

*Helping Keep Americans Connected*

The USAC Connection High Cost & Low Income monthly newsletter will give you information about upcoming program deadlines, tips to help you ensure timely and proper filings, and other timely information.

## High Cost Program

### IAS Annual Self-Certifications due July 2, 2007

Each price-cap carrier, and CETCs serving lines in the service area of a price-cap carrier, must file an annual self-certification **by July 2, 2007** in order to receive Interstate Access Support (IAS) for the upcoming program year (July 1, 2007 to June 30, 2008). This self-certification must be filed with USAC and the FCC, and must state that all IAS provided will be used **ONLY** for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

An IAS self-certification sample letter can be found on [USAC's High Cost Forms page](#) and may be filed by an authorized representative for the carrier. Be sure to reference CC Docket No. 96-45 and file the self-certification with USAC and the FCC. After you file, go to the [Certifications Page](#) to see if your self-certification has been received. If your self-certification is filed late, absent a waiver from the FCC, you will be eligible for IAS as follows:

By **9/30/07**, eligible for 4Q07, 1Q08, 2Q08.

By **12/31/07**, eligible for 1Q08, 2Q08.

By **3/31/08**, eligible for 2Q08.

See [File Certifications for IAS](#) for more information or call our Customer Service Center at 877-877-4925.

## Low Income Program

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### FCC Seeks Updated Comments in Proceeding for Promoting Deployment and Subscribership in Underserved Areas, Including "Near Reservation" Areas

The FCC's Wireline Competition Bureau is seeking to refresh the record in a proceeding related to what constitutes a "near reservation" area for federal Lifeline and Link Up support purposes with any new information or arguments they believe to be relevant to deciding the issues still pending. The refreshed record will enable the FCC to undertake appropriate consideration of the issue of how best to provide support through Lifeline and Link Up to "near reservation" areas.

In [FCC 00-208](#), issued June 30, 2000, the FCC adopted a definition of "tribal lands" that included "reservation" and "near reservation" areas, as defined by the Bureau of Indian Affairs (BIA) regulations. BIA has subsequently modified its definition of both reservation and near reservation areas. The FCC became aware that the term "near reservation" included wide geographic areas, extending substantially beyond the boundaries of reservations that did not possess the same characteristics that warranted the targeting of support to reservations. As a result, the FCC issued [FCC 00-332](#) August 31, 2000, staying implementation of the enhanced Lifeline and Link Up rules to qualifying low-income consumers located on "near reservation" areas.

In the Further Notice accompanying FCC 00-332, the FCC sought additional comment on how to extend the

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enhanced Lifeline and Link Up measures to qualifying low-income consumers living in areas or communities that are “near reservations.” Specifically, the FCC asked how to define geographic areas that are adjacent to the reservations or are otherwise a part of the reservation’s community of interest, in a manner that is consistent with its goal of targeting enhanced Lifeline and Link Up support to the most underserved segments of the Nation.

On May 21, 2003, the FCC again sought comment in [FCC 03-115](#) on potential modifications to its rules regarding availability of enhanced Federal Lifeline and Link Up assistance to qualifying low-income consumers living “near reservations” because few commenters had filed responses previously.

The Bureau seeks more detailed information on proposals contained in the current record, as well as additional proposals that may be more consistent with the FCC’s goal of targeting enhanced Lifeline and Link Up support to only the most underserved areas and that may impose fewer administrative burdens. The FCC seeks comment on outstanding issues from the 2003 Further Notice (paragraphs 34-38).

View the bureau’s public notice, [DA 07-1239](#), for information on how to file comments in this proceeding.

### FCC Seeks to Refresh Docket on Lifeline and Link Up Issues

The Federal Communications Commission (FCC) is seeking to refresh the record on issues related to the Lifeline and Link Up components of the Low Income Program. In April 2004, the FCC asked whether the income-based criterion in the federal default eligibility criteria should be increased to 150% of the federal poverty guidelines (FPG) to make phone service affordable to more low-income individuals and families.

Currently, federal default criteria specify that a consumer is eligible for Lifeline/Link Up support when the consumer’s income is at or below 135% of the FPG, or if the consumer participates in one of several federal assistance programs, such as Temporary Assistance for Needy Families (TANF) or the National School Lunch’s free lunch program (NSL).

The FCC had conducted an analysis that estimated that broadening the income-based criterion to 150% of the FPG may only have a minimal impact on national telephone penetration rates, but could add many new Lifeline subscribers potentially resulting in an additional \$200 million increase in Lifeline expenditures over the levels predicted for implementation of a 135% standard. The FCC seeks comment on its analysis.

The FCC also asked whether adoption of rules governing the advertisement of the Lifeline/Link Up program, as opposed to guidelines, would strengthen the operation of these programs. For example, the FCC asked whether it should require eligible telecommunications carriers to print and distribute posters, flyers, or other print media advertising Lifeline and Link Up to state, federal, or tribal public assistance agencies in their service areas.

The refreshed record will enable the FCC to undertake appropriate consideration of the issue of how best to provide support through the Lifeline and Link Up programs to more low-income individuals and families.

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USAC appreciates feedback on this newsletter. For any questions or comments, please contact Ed Rovetto, Program Manager, External Relations, at [erovetto@usac.org](mailto:erovetto@usac.org).

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# High Cost Program

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## ICLS Annual Self-Certifications due July 2, 2007

Each rate-of-return carrier, and CETCs serving lines in the service area of a rate-of-return carrier, must file an annual self-certification **by July 2, 2007** in order to receive Interstate Common Line Support (ICLS) for the upcoming program year (July 1, 2007 to June 30, 2008). This self-certification must be filed with USAC and the FCC, and must state that all ICLS provided will be used **ONLY** for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

An ICLS self-certification sample letter can be found on [USAC's High Cost Forms page](#) and may be filed by an authorized representative for the carrier. Be sure to reference CC Docket No. 96-45 and file the self-certification with both USAC and the FCC. After you file, go to the [Certifications Page](#) to see if your self-certification has been received. If your self-certification is filed late, absent a waiver from the FCC, you will be eligible for ICLS as follows:

By **9/30/07**, eligible for 1Q08, 2Q08.

By **12/31/07**, eligible for 2Q08.

After **12/31/07**, not eligible for ICLS support.

### Addresses for Filing IAS and ICLS Self-Certifications

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See [File Certifications for ICLS](#) for more info or call our Customer Service Center at 877-877-4925.

## Price-Cap Carriers and CETCs Receiving IAS Must File Quarterly Line Counts by June 29, 2007

All price-cap carriers and CETCs serving lines in the service area of a price-cap carrier, or their agents, are required to file line counts for IAS with USAC **by June 29, 2007** for the number of lines served as of March 31, 2007. CETCs must use the new [Form 525](#). Lines must be reported by UNE zone and customer class.

An officer or authorized employee must complete the reporting carrier certification page of Form 525. If an agent files on behalf of the company, the company must complete the top portion of the agent certification page and the agent is responsible for completing the bottom portion.

If the Form 525 is filed electronically (e.g., by fax or e-mail), the signed certifications of the authorized persons still must be received by USAC by the due date. If filings, including certifications, are not received by the due date, you will need to seek a waiver from the FCC. USAC cannot waive the filing deadline. Only an FCC waiver will permit USAC to use your filings to calculate IAS. CETCs can send Form 525 to:

Universal Service Administrative Company  
444 Hoes Lane  
Piscataway, NJ 08854  
By Fax: (866) 873-4666  
By E-mail: [hcfilings@hcli.universalservice.org](mailto:hcfilings@hcli.universalservice.org)

For questions about IAS line counts, call our Customer Service Center at (877) 877-4925.