Alexicon *insider*

SPECIAL BULLETIN

Lifeline
Rolling Recertification

In the FCC's 2016 Lifeline Reform Order, a new annual Lifeline Customer recertification process was adopted: rolling recertification. The new rules were effective January 1, 2017 but there was a phase-in of the requirement in 2017 so that no rolling recertifications are required for customers with anniversary dates that fall between January 1 and June 30, 2017. **However, given the time necessary to perform Lifeline customer recertifications, the time is now to begin the process for customers with July anniversary dates.**

Recall that rolling recertification means that each customer must be checked annually, with the process being complete on or before their anniversary date. Thus, a customer who first received a Lifeline credit from the ETC in July 2016 must have their recertification process complete by July 2017. Conversely, a Lifeline customer with a March 2015 initiation date will not be recertified in 2017 at all.

According to FCC Lifeline customer recertification rules, the minimum amount of time the process can take is approximately 65 days: (1) Send recertification letter, (2) allow 60 days for response, (3) de-enroll non-responsive customers or those who failed the recertification criteria within 5 days. Also, the process for recertification cannot be initiated before 150 days prior to the customer's anniversary date. Finally, the rolling recertification can be performed in batches (i.e., handle all July customer anniversaries in one mailing/process).

USAC has posted a substantial amount of information here. We recommend all ETCs review this prior to beginning the rolling Lifeline customer recertification process. Of particular importance are the sample recertification schedules and the FAQs posted.

If you have any questions, please let us know.

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