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SPECIAL BULLETIN

Lifeline Rules Effective Date

The Wireline Competition Bureau recently released a [Public Notice](#) concerning the effective date of various rules adopted in the June 2015 [Order](#) on Reconsideration, Second Report and Order, and Memorandum Opinion and Order (see July 7, 2015 Special Bulletin). According to the Notice, the OMB will announce approval of the rules via the Federal Register on February 4, 2016, making the rules effective on that date.

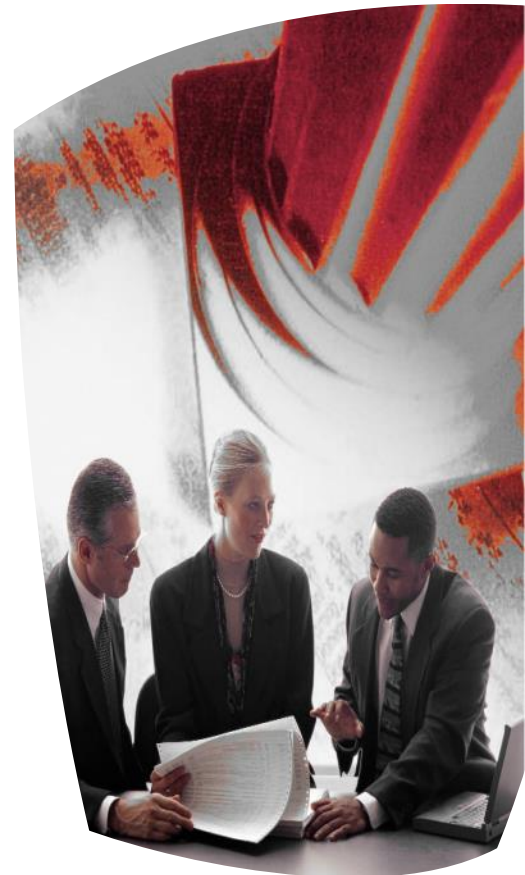
For most ETCs, the two most important rule revisions are:

- (1) *Document retention.* All ETCs are now required to retain documentation from Lifeline customers, for three years, demonstrating the subscriber's eligibility under the program and income-based criteria. Previously, ETCs were precluded from retaining such information. **All ETCs providing Lifeline service should begin retaining this documentation (for prospective customers) on February 4, 2016.**
- (2) *Uniform Snapshot Date.* The FCC adopted a uniform "snapshot" date for all ETCs to use when reporting Lifeline customer counts on the monthly Form 497s (the first of the month). This rule is also effective on February 4, 2016, but because the FCC's original decision provided for a transition of 180 days from the effective date of the order (which is February 9, 2016, and is after the February Form 497 is due), ETCs should begin using the uniform snapshot date on March 1. **Therefore, the March 2016 Form 497 should reflect Lifeline customer counts as of March 1, 2016, and the first of each month should be used going forward.**

⇒ It should be noted that a [Petition for Reconsideration](#) is pending that asks the FCC to revise the uniform snapshot rule. One of the issues raised is that most ETCs bill in advance and generate bills prior to the first of the month (e.g., on the 24th or 25th). If a Lifeline customer discontinues service or is de-enrolled between the bill date and the first of the month, then the ETC could provide service (and the Lifeline discount) to a customer and not receive reimbursement.

All other rule revisions adopted in the June 2015 Order(s) are effective February 4, 2016.

Please let us know if you have any questions.



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Questions? Comments?
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