



C O M M U N I C A T I O N S

415 Fourth St. • P.O. Box 588  
Brookings, S.D. 57006


605.692.6211 • Fax 605.697.8250

RECEIVED

JUN 14 2005

SOUTH DAKOTA PUBLIC  
UTILITIES COMMISSION

June 13, 2005

TO: South Dakota Public Utilities Commission  
FROM: Laura Julius, Director of Finance   
RE: In the Matter of the Review of Implementation of FCC Requirements for Lifeline and Link-Up Programs and the Development of Additional Outreach Efforts  
TC 05-058

To implement Lifeline / Link-Up discount program changes we have done, or will be taking, the following steps:

1. **Modify Application Form:**

The existing application form for the discounts has been modified with the additional qualifying options. We will start using it June 20, 2005.

2. **Letter to Sample of Existing Lifeline Customers:**

We sent a letter to our active-service customers who applied for the Lifeline discount in 1998 (the first year), 1999 or 2000; this totals approximately 1/3 of our Lifeline customers. The letter asked them to complete a new application form and provide documentation to verify their participation in the qualifying assistance program. Non-respondents will lose their discount. This step fulfills our requirement of confirming that at least a sample of our existing Lifeline customers continue to qualify.

We plan to begin a cycle of contacting each Lifeline customer every 3-4 years to confirm their qualification. In 2006, we will contact another 1/3 of the active Lifeline customers; those who applied for the discount in 2001, 2002 or 2003. In 2007 we will reevaluate our numbers and contact about 1/3 of the active Lifeline customers. We expect this will cover those customers who applied in 2004, 2005 or 2006.

3. **Outreach Guidelines:**

We will continue to display information about the Lifeline / Link-Up discount programs at each customer service representative's desk; this prominently-placed item provides clear basic information about the option to all new customers applying for service. By no longer having the CSR's specifically describe the option, we have avoided some new customers taking offense by thinking that we judged them as qualifying based on their appearance.

Annual bill-messages will also continue. Customers receiving the Lifeline monthly discount get a message stating that the discount is active on their account, outlining the qualifications, and reminding them to inform us if they no longer qualify. Customers not currently receiving the discount get a message stating the discount is available and outlining the ways to qualify.

Lifeline / Link-Up brochures will be added to our new-customer information packets. We will also explore printing this in our telephone directory information pages again. And, newspaper advertisements will be published annually.

We will contact the local administrative offices of the qualifying assistance programs and other low-income general assistance offices. We will ask if we can provide them with wall signs and/or Lifeline/LinkUp brochures to display for their clients. The signs and brochures will list the qualifying programs and give information on how to contact our customer service office to apply.

4. **FCC-Mandated Recordkeeping:**

The new record-keeping rules will be followed.

5. **Carrier Self-Certification:**

USAC will receive the required certifications signed by an officer of the company.

6. **Train Employees:**

Employees will be trained on the changes and new requirements.



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## LIFELINE AND LINK-UP DISCOUNT APPLICATION

(Please Print)

NAME \_\_\_\_\_ Social Security # \_\_\_\_\_  
(First) (M. I.) (Last)

ADDRESS \_\_\_\_\_ Brookings, SD 57006

SWIFTEL TELEPHONE NUMBER (\_\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

1. I am applying for the following on the primary telephone line, in my name, at my residence:  
     \_\_\_\_\_ LIFELINE monthly service discount      \_\_\_\_\_ LINK-UP connection charge discount
2. I am stating that I qualify for the requested discount because:
  - A. I participate in the program(s) checked below; I agree to furnish proof of my participation to Swiftel Communications:  
     \_\_\_\_\_ Medicaid (not the same as Medicare)  
     \_\_\_\_\_ Food Stamps  
     \_\_\_\_\_ Supplemental Security Income (SSI)  
     \_\_\_\_\_ Federal Public Housing Assistance  
     \_\_\_\_\_ Low-Income Home Energy Assistance  
     \_\_\_\_\_ Temporary Assistance for Needy Families (TANF)  
     \_\_\_\_\_ National School Lunch (NSL) free lunches
  - B. \_\_\_\_\_ My household income is at or below 135% of the Federal Poverty Guidelines (see information on the back of this sheet) based on a family size of \_\_\_\_\_.

I agree to notify Swiftel Communications when I no longer qualify based on the criteria indicated above.

I CERTIFY UNDER PENALTY OF PERJURY THAT THE ABOVE INFORMATION IS TRUE. I have read the information above and understand how I must qualify to receive the Lifeline or Link-Up assistance discount on my primary residential telephone line. I also hereby authorize the administrative office for any program indicated above to verify my participation to Swiftel Communications.

Signature \_\_\_\_\_

Date \_\_\_\_\_

## HOUSEHOLD INCOME GUIDELINES

Use the chart below to determine income eligibility of applicants for the Lifeline or Link-Up discounts.

Applicants are required to provide certification indicating the number of individuals in their household and documentation accurately representing the consumer's total annual household income. "Income" means all income actually received by all members of the household. It includes:

- salary before deducted taxes
- public assistance benefits
- Social Security payments
- retirement/pension fund payments
- veteran's benefits
- unemployment compensation
- worker's compensation benefits
- inheritances
- alimony
- child support payments
- gifts
- lottery winnings
- The only exceptions are student financial aid, military housing and cost-of-living allowances, and irregular income from occasional small jobs such as baby-sitting or lawn mowing.

Acceptable income documentation includes:

- prior year federal/tribal tax return,
- current income statement/paycheck stub from an employer for three consecutive months during the previous six months
- Statement of Benefits from any of the following for three consecutive months during the previous six months:
  - Social Security Administration
  - Retirement/Pension Fund
  - Unemployment/Worker's Comp Admin
  - Veterans Administration
- Federal/Tribal notice or letter of General Assistance participation
- Court Order: Divorce decree (alimony), Child Support statement, or Probate (inheritance)

2005 Est. Income Requirements for a Household At or Below 135% of the Federal Poverty Guidelines:

Size of Family Unit	Estimated Income in the 48 Contiguous States
1	\$12,920
2	\$17,321
3	\$21,722
4	\$26,123
5	\$30,524
6	\$34,925
7	\$39,326
8	\$43,727
For each additional person, add...	\$ 4,401



C O M M U N I C A T I O N S

415 Fourth St. • P.O. Box 588  
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605.692.6211 • Fax 605.697.8250

April 8, 2005

Dear Swiftel Customer:

You are receiving this letter because you currently participate in Swiftel Communications' Lifeline assistance program. Changes in Federal Communications Commission (FCC) guidelines for the Lifeline program now require telephone companies like ours to annually verify some of our Lifeline customers' continued eligibility.

The Lifeline assistance program has been available since 1998 to participants in one or more of the following programs:

- Medicaid
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance
- Low Income Housing Energy Assistance

Participation in either of these programs has now been added:

- Temporary Aid to Needy Families (TANF)
- National School Lunch (NSL) free lunch program

In addition, there are now income guidelines that determine eligibility:

- Households with total income at or below 135% of the Federal Poverty Guidelines, regardless of participation in other assistance programs, are now also eligible for Lifeline assistance.

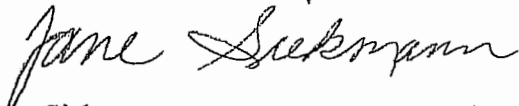
To continue receiving the Lifeline discount, Swiftel needs an updated application from you. ***If you are still eligible for Lifeline assistance, please complete the enclosed application and return it to our office with documentation of your participation in the program(s) indicated. To continue receiving the discount, we need to receive the form by June 8, 2005.*** If it is not received by that date, we are required to remove the credit from your account.

Documentation of your participation could include a letter from the office administering the program, a copy of a card issued for the program, a current statement of benefits for the program, or a similar document, in writing, that verifies your current participation in at least one of the qualifying assistance programs listed above. You may deliver the application and documentation to our office in person, or mail them back in the return envelope provided.

If you qualify based on household income, you need to bring the necessary documentation to our office at 415 Fourth Street, Brookings. We are required to personally view the documents supporting your income-based eligibility; however, we do not keep copies of the documents. Please see the back of the application form for a description of the Household Income Guidelines.

Please feel free to call me at 692-6211 or 692-6325 with any questions you may have regarding the application or the Lifeline program.

Sincerely,

A handwritten signature in cursive script that reads "Jane Siekmann".

Jane Siekmann  
Customer Care Supervisor

Enclosure



C O M M U N I C A T I O N S

415 Fourth St. • P.O. Box 588  
Brookings, S.D. 57006

605.692.6211 • Fax 605.697.8250

### LIFELINE DISCOUNT APPLICATION

(Please Print)

NAME \_\_\_\_\_ Social Security # \_\_\_\_\_  
(First) (M. I.) (Last)

ADDRESS \_\_\_\_\_ Brookings, SD 57006

SWIFTEL TELEPHONE NUMBER ( \_\_\_\_\_ ) \_\_\_\_\_ - \_\_\_\_\_

1. I am applying for the Lifeline discount on the primary telephone line, in my name, at my residence. If I move and incur connection charges, the Link-Up discount will be applied.
2. I am stating that I qualify for the requested discount because:
  - A. I participate in the program(s) checked below; I agree to furnish proof of my participation to Swiftel Communications:
    - Medicaid (not the same as Medicare)
    - Food Stamps
    - Supplemental Security Income (SSI)
    - Federal Public Housing Assistance
    - Low-Income Home Energy Assistance
    - Temporary Assistance for Needy Families (TANF)
    - National School Lunch (NSL) free lunches
  - B.  My household income is at or below 135% of the Federal Poverty Guidelines (see information on the back of this sheet) based on a family size of \_\_\_\_\_.

I agree to notify Swiftel Communications when I no longer qualify based on the criteria indicated above.

I CERTIFY UNDER PENALTY OF PERJURY THAT THE ABOVE INFORMATION IS TRUE. I have read the information above and understand how I must qualify to receive the Lifeline or Link-Up assistance discount on my primary residential telephone line. I also hereby authorize the administrative office for any program indicated above to verify my participation to Swiftel Communications.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Return completed form to Swiftel. Discounts begin on the billing cycle after application is approved.

## HOUSEHOLD INCOME GUIDELINES

Use the chart below to determine income eligibility of applicants for the Lifeline or Link-Up discounts.

Applicants are required to provide certification indicating the number of individuals in their household and documentation accurately representing the consumer's total annual household income.

"Income" means all income actually received by all members of the household. It includes:

- salary before deducted taxes
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- retirement/pension fund payments
- veteran's benefits
- unemployment compensation
- worker's compensation benefits
- inheritances
- alimony
- child support payments
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- The only exceptions are student financial aid, military housing and cost-of-living allowances, and irregular income from occasional small jobs such as baby-sitting or lawn mowing.

Acceptable income documentation includes:

- prior year federal/tribal tax return,
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7	\$39,326
8	\$43,727
For each additional person, add...	\$ 4,401





415 4<sup>th</sup> St - Brookings, SD 57006

**Don't Delay...** In early April, we sent you a letter telling you about changes in the Lifeline telephone discount program.

We requested two things in this letter:

1. An updated Lifeline application
2. Documentation of your eligibility

The letter we sent gives the details needed and includes the current application form. If you have lost or misplaced these, call 692-6211 or 692-6325 and request copies of them.

Swiftel Communications must receive a new application and documentation from you by June 8<sup>th</sup> in order to keep the Lifeline credit on your account. If not, we are required to remove the credit; this will increase your monthly telephone charges due by \$8.25.



## PLEASE NOTE:

The Lifeline discount of an \$8.25 credit on your monthly bill has been removed. We are required to remove it because we did not receive confirmation that you continue to qualify for the discount. Please refer to the letter dated April 8, 2005 and the follow-up notice sent on May 16, 2005 for details, or call our business office at 605/692-6211.

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## Outreach guidelines for Lifeline/LinkUp programs

List of places we will ask to display Lifeline/LinkUp posters and brochures (not all-inclusive):

- Women's shelter
- Nursing homes
- Harvest Table (Methodist Church)
- Food Pantry
- Sr. Housing/Assisted Living facilities
- Sr. Center
- SD Social Services office
- Federal Housing office
- Apartment-rental offices
- County Welfare office
- Advance office and apartments (disabled persons assistance org)

Ideas on other methods of sharing this information:

- Include in back-to-school, and new-student, packets (public schools)
- Request an item in public school newsletters
- Have Public Service Announcements on/in:
  - radio/TV
  - Register (local newspaper)
  - Collegian (SDSU campus newspaper)
- On SD State University campus:
  - Fall registration freebie-bags
  - Student Union
  - Financial Aid office
  - One-Stop Career Center

Kelli will have poster and brochure drafts made by Joyce. She will eventually contact the offices/places given above and request placement of our materials.

# Assistance for Basic Home Telephone Service

**Lifeline** provides a monthly discount to eligible subscribers on basic home telephone service.

Lifeline subscribers may also receive long distance blocking on their telephone free of charge.

**Link-up** provides eligible subscribers with a 50% reduction (up to \$30) for connection of basic home telephone services.

Lifeline  
LINK-UP



Contact Swiftel Communications at 692-6211 for details.

**Swiftel**

COMMUNICATIONS CORPORATION

## Qualifications

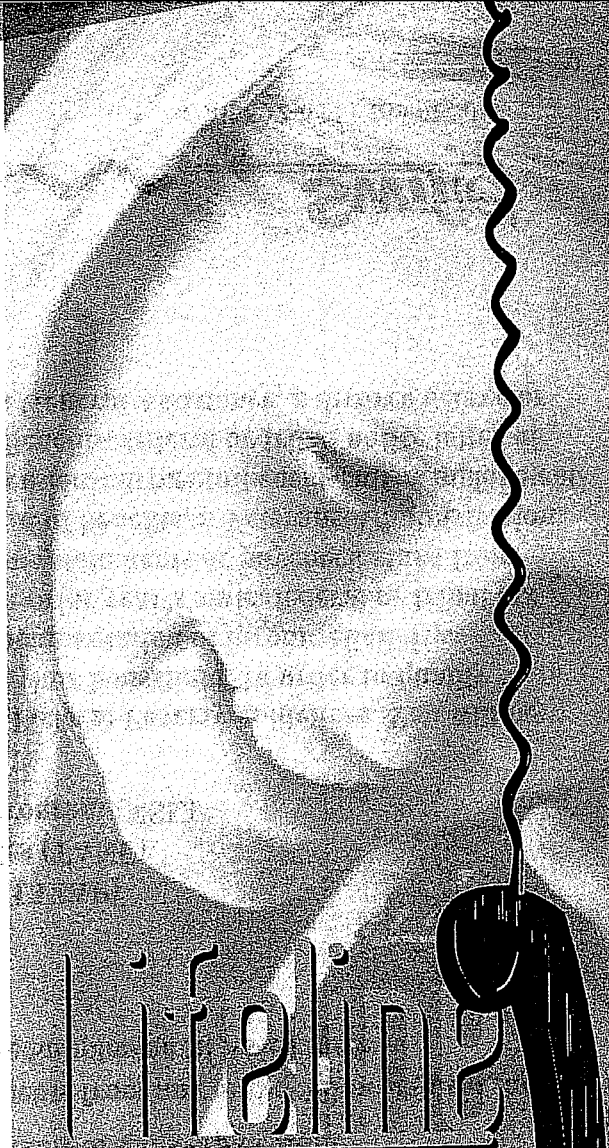
People currently participating in at least one of the programs listed below qualify for Lifeline and Link-up. You also qualify if your income is at or below 135% of the Federal Poverty Guidelines

- Medicaid (eg. Title XIX/Medical, State Supplement Assistance)
- Food Stamps
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance
- Low Income Energy Assistance (LIEAP)
- Temporary Assistance to Needy Families (TANF)
- National School Lunch Free Program (NSL)

## TO APPLY

Contact Swiftel at 692-6211 for details.

**Swiftel** 605-692-6211  
COMMUNICATIONS 415 4th St Brookings SD



Lifeline

LINK-UP

Assistance for Basic  
Home Telephone Service

**Swiftel** 605-692-6211  
COMMUNICATIONS 415 4th St Brookings SD

# Lifeline Program

Lifeline provides a monthly discount to eligible subscribers on basic home telephone services.

Lifeline subscribers may also receive long distance blocking on their telephone free of charge.

# Link-up Program

Link-up provides eligible subscribers with a 50% reduction (up to \$30) for connection of basic home telephone services.

## Do you qualify for Lifeline and/or Link-up Assistance?

Listed below are some questions you may need to answer:

1. Which program are you applying for? Lifeline or Link-up or Both
2. Are you currently receiving assistance benefits from any of the following programs?
  - Medicaid (e.g., Title XIX/Medical, State Supplemental Assistance)
  - Food Stamps
  - Supplement Security Income (SSI)
  - Federal Public Housing Assistance
  - Low-Income Home Energy Assistance (LIEAP)
  - Temporary Assistance to Needy Families (TANF)
  - National School Lunch's Free Lunch Program (NSL)

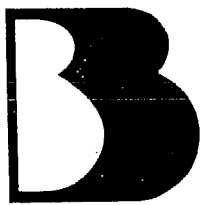
3. Do you qualify under the income criteria?

Income must be at or below 135% of the Federal Poverty guidelines. You will be asked to list the number of individuals in your household. In order to qualify under this criterion, you must provide documentation of income eligibility. Documentation may consist of a copy of a prior year's state, federal or tribal tax return, three consecutive months of income statements or paycheck stubs from your employer, a Social Security statement of benefits, a Veterans Administration statement of benefits, a retirement/pension statement of benefits, an Unemployment/Workmen's Compensation statement of benefits, federal or tribal notice letter of participation in Bureau of Indian Affairs General Assistance, a divorce decree or child support document.



**Swift**

COMMUNICATIONS  
Call 692-6211 for details.



# BROOKINGS municipal utilities

525 Western Ave. • P.O. Box 588  
Brookings, S.D. 57006  
(605) 692-6325

## Verification of Consumers' Continued Eligibility for Lifeline

Date: June 13, 2005

To: Vice President – High Cost and Low Income Division  
Universal Service Administrative Company  
2000 L Street, NW, Suite 200  
Washington, DC 20036

This letter is to certify that City of Brookings Municipal Telephone Department has procedures in place to verify the continued eligibility of a statistically valid random sample of its Lifeline customers. The results are provided in the chart below.

To the extent any Lifeline customers qualify based on their income, I certify that my company has income verification procedures in place and that, to the best of my knowledge, the company was presented with corroborating income documentation.

I am an officer of the company named above. I am authorized to make this certification for the Study Area(s) listed below.

Company name	Company SAC	State	Number of Lifeline customers surveyed	Number of Lifeline customers found to be ineligible	Number of Lifeline customers who did not respond to survey*
City of Brookings Municipal Telephone Department	391650	SD	156	3	49

\*Note: Per the FCC's direction in Public Notice DA 05-1406 (rel. May 18, 2005), companies should update their filing upon completing the survey.

Signed,

Steve Meyer  
Asst. General Manager/Finance & Acctg. Manager  
PO Box 588, 525 Western Ave.  
Brookings, SD 57006  
605-692-6325