

VENTURE COMMUNICATIONS COOPERATIVE

IN THE MATTER OF THE REVIEW OF
IMPLEMENTATION OF FCC REQUIREMENTS
FOR LIFELINE AND LINK-UP PROGRAMS
AND THE DEVELOPMENT OF ADDITIONAL
OUTREACH EFFORTS

RECEIVED
MAY 20 2005
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Re: Docket TC05-058

To comply with the new eligibility requirements, we have updated our Lifeline/Linkup applications to reflect the changes:

1. We have added a section relating to the new eligibility criteria of allowing consumers to qualify for this program if their income is at or below 135% of the Federal Poverty Guidelines. This section also indicates that documentation is required to qualify under this criteria. The last portion of the application requires that a consumer attempting to qualify under this criteria must self-certify, under penalty of perjury, the number of individuals in the household and that the documentation accurately represents the consumer's annual household income.
2. We added the eligibility criteria of Temporary Assistance to Needy Families (TANF) to the regular Lifeline/Linkup application. This criteria was already on the Enhanced Lifeline/Linkup application.
3. We added the eligibility criteria of participation in the National School Lunch free lunch program to the regular Lifeline/Linkup application. This criteria was already on the Enhanced Lifeline/Linkup application.

The new income-based eligibility criterion requires that the consumer must provide documentation of income eligibility at enrollment. An officer of Venture must certify annually that we have procedures in place to review income documentation and that, to the best of the officer's knowledge, Venture was provided with documentation that the consumer's household income is at or below 135% of the Federal Poverty Guidelines.

The office manager is to review all applications for consumers wishing to qualify under these guidelines and will ensure that the applicant has self-certified, under penalty of perjury, their income levels and number of individuals in the household. In addition, the office manager will review documentation provided by the consumer in support of this application. We are requesting a copy of the most current tax return as a preferred documentation but will also accept copies of pay stubs showing three months of income, Social Security statements, unemployment statements, etc.

We are working to comply with the verification procedures in a couple of ways. We are going to utilize the sample approach for verifying a sub-set of our current Lifeline subscribers by the June 22, 2005 deadline. However, we are also working to verify all of our existing Lifeline subscribers over the next several months since many of them have

been on this program since its inception. This is a very time-consuming and labor-intensive process as it is not easy to get information from state agencies and, while we have received documentation from many of our subscribers, we have many more subscribers who have not yet responded.

We are evaluating the possibility of out-sourcing the Lifeline program (implementation and verification) to NECA Services. We are also hoping that various state agencies will help us establish a method to assist with the verification process so that it is more invisible to our customer base. A significant portion of our Lifeline subscribers have been greatly aggravated with the verification requirement.

Venture Communications has been working on advertising our Lifeline/Linkup program for several years now. We have advertised this program in our area newspapers and in our company newsletter. We have also placed particular emphasis on promoting the enhanced Lifeline/Linkup program in our tribal areas by working with the tribal offices to make people living on tribal lands aware of this program. For example, in the Sisseton area, we have had community meetings and "sign-up drives".

Janette Jessen
Office Manager