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IN THE MATTER OF ADOPTING EXPANDED ELIGIBILITY CRITERIA FOR LIFELINE AND LINK-UP AND CERTIFICATION, VERIFICATION AND RECORDKEEPING REQUIREMENTS	Docket No. T-00000A-05-0380

NOTICE OF FILING

Attached is the Report and Recommendations of the Arizona Eligible Telecommunications Carriers ("ETCs") on Lifeline and Link-Up. In Decision No. 67941, the Arizona Corporation Commission ("Commission") ordered all Arizona ETCs to meet with the Department of Economic Security ("DES") within 30 days of the Decision's effective date and to docket a report to the Commission within 6 months containing a report and recommendations on the following issues: 1) whether the development of an electronic interface for Lifeline verification and certification would be beneficial in Arizona; 2) how other states' on-line electronic interfaces operate; 3) whether such interfaces have had an impact on subscribership rates in these other states; 4) cost recovery options to cover the costs of an on-line interface of this nature; 5) whether centralized administration by DES of all ETC end-user assistance programs would be beneficial; and 6) outreach programs that should be implemented to increase subscribership in Arizona.

RESPECTFULLY SUBMITTED THIS 21st day of December, 2005

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Report and Recommendations of the Arizona Eligible Telecommunications Carriers on Lifeline and Link-Up Issues

On April 29, 2004, the Federal Communications Commission ("FCC") issued its "Report and Order and Further Notice of Proposed Rulemaking." FCC 04-87 ("FCC Lifeline Order"). The FCC Lifeline Order expanded the federal default eligibility criteria for the Lifeline and Link-Up telephone assistance programs to include the Temporary Assistance to Needy Families program ("TANF") and the National School Lunch program ("NSL"). Additionally, the FCC expanded the eligibility criteria to include households whose size and income level was at or below 135% of the Federal Poverty Guidelines. The FCC Lifeline Order also introduced new requirements for certification and annual verification of qualification on the part of all states and emphasized the continued need for outreach to individuals likely to qualify for the Lifeline and Link-Up programs. The FCC based its Lifeline Order upon recommendations in the April 2, 2003 decision of the Federal-State Joint Board on Universal Service.

On June 21, 2005, the Arizona Corporation Commission ("Commission") adopted the FCC's expansion of Lifeline and Link-Up eligibility criteria in Decision No. 67941 ("Decision"). The Decision required all Eligible Telecommunications Carriers ("ETCs") to meet with the Arizona Department of Economic Security ("DES") within 30 days of the Decision's effective date and to docket within six months a report to the Commission with recommendations on the following: (1) whether the development of an electronic interface for Lifeline verification and certification would be beneficial in Arizona; (2) how other states' on-line electronic interfaces operate; (3) whether such interfaces have had an impact on subscribership rates in these other states; (4) cost recovery options to cover the costs of an on-line interface of this nature; (5) whether centralized administration by DES of all ETC end-user assistance programs would be beneficial; and (6) outreach programs that should be implemented to increase subscribership in Arizona.[1]

[1] The Decision also required that ETCs should (1) amend the Lifeline and Link-Up provisions in their tariff to reflect compliance with the Lifeline Order; (2) docket updated tariff pages within 60 days from the effective date of the Decision for review and approval by the Utilities Division; and (3) docket a report with the Commission within 12 months from the effective date of the Decision which discusses the

To comply with the requirements of the Decision, a team of Arizona ETCs (the "Team") met regularly from mid-July through mid-December. Representatives from Arizona DES-Community Services Administration ("DES-CSA") and Arizona DES-Family Assistance Administration ("DES-FAA") also participated in those meetings. In addition, representatives from the Commission Staff and the Arizona Community Action Association ("ACAA") met with the Team to answer questions and to offer suggestions. (See Exhibit A for a list of Team members, participants, and meeting dates.)

The Team determined their overall objective was to develop a plan to increase enrollment of qualified individuals in the Arizona Lifeline program. Approximately 60,000 households currently receive Lifeline discounts through the ETCs represented on the Team, of these, roughly 50,000 receive Enhanced Lifeline[2] discounts. Although the Team agrees that automatic enrollment appears to be the single most effective means to accomplish its objective, the Decision's new eligibility criteria, centralized agencies, and electronic interfaces should also contribute to the Team's objective to increase Lifeline enrollment.

The Team proposes the following two-phase Lifeline enrollment program. Additionally, a report on the six areas of interest identified by the Decision is summarized below.

A. The Two-Phase Lifeline Enrollment Program

The proposed hybrid program incorporates automatic enrollment, where feasible, with traditional self-certification enrollment for those individuals qualifying for Lifeline based on participation in programs that are not currently administered by a centralized agency.

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carriers' outreach programs utilizing the new FCC guidelines and their impact on subscribership levels. These additional requirements, however, are outside the scope of this report.

[2] Enhanced Lifeline (sometimes called Tribal Lifeline or Tier Four Support) provides qualifying residents of Native American Indian and Alaska Native tribal communities additional support under the Lifeline Assistance Program and Link-Up America. Lifeline provides discounts on monthly service for qualified telephone subscribers ranging from $8.25 to $10.00 per month, depending upon the applicable state provisions. Link-Up helps qualified low-income consumers pay the initial costs for commencing service by offsetting one-half of the initial hook-up fee, up to $30.00. Enhanced Lifeline supplies further assistance up to an additional $25.00 in monthly Lifeline support and up to an additional $70.00 in Link-Up support.

Phase I: *Engage DES-FAA to automatically enroll individuals in Arizona Lifeline, as well as Tribal Lifeline,[3] and have ETCs participate in cooperative outreach programs that target ACAA offices.*

DES-FAA currently administers three Lifeline and Link-Up qualifying programs: Food Stamps, TANF, and Arizona Health Care Cost Containment System (Title 19 Medicaid) ("AHCCCS").[4] DES-FAA estimates that there is an unduplicated caseload of 432,559 households enrolled in these three programs, which is approximately 77% of Arizonans who qualify for Arizona Lifeline. Since DES-FAA is already working with the majority of those who qualify for Lifeline, DES-FAA is in the best position to automatically enroll these individuals into Lifeline.

It is the Team's understanding that DES-FAA can modify its current application for Food Stamps, TANF, and AHCCCS to include a specific question about Arizona Lifeline. The application would ask applicants to indicate: (1) if they would like to enroll in Lifeline, (2) to identify their current ETC, and (3) to authorize the release of their information to their chosen ETC. Information from these new enrollees would be captured by DES-FAA caseworkers and then electronically transmitted to the ETC identified by the applicant on a weekly basis. It is anticipated that through this process as many as 400,000 new households could be enrolled in Arizona Lifeline over the course of a year, a substantial increase in today's enrollment. It could result in an increase of over $38 million dollars in federal funding coming into the state ($8.00 per month x 12 months x 400,000 households).

Although this represents a significant increase in the number of households currently enrolled in Arizona Lifeline, the 2000 Decennial Census reports a total of 1,189,431 persons at

[3] There are several tribal-owned ETCs, not under the jurisdiction of the ACC, who provide Lifeline and Link-Up assistance. These ETCs should also benefit from the implementation of Phase I.

[4] Different agencies of federal and state government administer the other qualifying programs. For example, the Department of Education administers the NSL program, the Social Security Administration administers Supplemental Security Income ("SSI"), the Department of Housing and Urban Development administers Federal Public Housing, the Arizona Community Action Network administers Low-Income Home Energy Assistance Program ("LIHEAP"), and AHCCCS determines eligibility for Title 21 Medicaid ("KidsCare").

or below 150% of the poverty level in Arizona.[5] An additional 491,445 may be eligible based on the KidsCare program, which qualifies individuals at 200% of the poverty level. These statistics increase the number of potentially qualified persons up to 1,680,876. Assuming an average household size of three persons per household, this translates to a potential increase of 560,292 qualified households in Arizona. Taking into consideration the unduplicated caseload of 432,559 via automatic enrollment with DES-FAA, this still leaves approximately 127,733 (23%) of qualified households who need another way of enrolling in Arizona Lifeline.

The remaining 23% would continue to self-certify for Arizona Lifeline using a paper application just as they do today. To address the gap by automatic enrollment, all ETCs will participate in cooperative outreach programs to reach and enroll the remaining 23%. The cooperative outreach programs will target ACAA offices where individuals apply for LIHEAP, as well as any other public offices identified as locations where those who qualify for Lifeline might be reached and made aware of the application process.

Engaging DES-FAA to automatically enroll approximately 77% of Arizonans into Lifeline is a relatively straightforward process that can be accomplished in the very near term, provided that funding for administrative costs is made available to do so. (See Report below at issue 4 for funding options.)

Assuming that the Commission proceeds with Phase I and appropriate funding is available, the Team recommends the Commission appoint a standing subgroup to work through the programming and implementation details associated with the DES-FAA automatic enrollment program and the cooperative outreach plan. The subgroup should be responsible for evaluating the success of Phase I and report the results to the Commission with recommendations before Phase II is implemented.

<u>Phase II</u>: *Identify and implement additional outreach programs and engage the Arizona Department of Revenue to include Arizona Lifeline Certification when sending the tax returns of qualifying individuals.*

[5] Decision No. 675941 established the Arizona income-level criteria at 150% of the federal poverty level instead of the FCC's 135%.

After evaluation of outcomes realized in Phase I, new and innovative outreach strategies and materials should be developed to reach individuals not enrolled during Phase I. Working with the ACAA will be necessary to identify new ways to outreach.

In addition to developing new outreach strategies, the Team recommends partnering with the Arizona Department of Revenue to identify qualifying households based on their annual Arizona Income Tax filing. Using tax records, it might be possible for the Arizona Department of Revenue to identify Arizona households whose size (number of dependents) and household income is at or below 150% of the Federal Poverty Guidelines. The Arizona Department of Revenue could then mail these individuals an "Arizona Lifeline Certification form," which they could then forward to the ETC providing their phone service.[6] (See Exhibit B for a similar form used by North Dakota for Lifeline enrollment.) These efforts, combined with the automatic enrollment implemented in Phase I, could significantly improve Lifeline enrollment in Arizona.

B. <u>Discussion on Six Areas of Interest</u>

Pursuant to the Decision, the Team submits the following report addressing the six issues of interest set forth in the Decision, which supports the Team's recommendations above.

(1) Whether the development of an electronic interface for Lifeline verification and certification would be beneficial in Arizona.

The Team believes that an electronic interface between DES-FAA and the various ETCs is necessary to facilitate enrolling the large number of households qualifying for Arizona Lifeline each month. Although specific details to implement the program have yet to be worked out, information on qualified applicants could be electronically transferred from DES-FAA to the applicant's current ETC, thereby facilitating automatic enrollment in Lifeline.[7] DES-FAA has provided a high-level estimate for the development and maintenance of such an enrollment program (see Exhibit C). Based on the Team's high-level discussion of system requirements,

[6] It should be noted that Phase II of the team's recommendation has not been discussed with any representatives of the Arizona Department of Revenue and would require further exploration and negotiation between the appropriate parties.

[7] Applicants without current telephone service would not be automatically enrolled but would be provided information on Lifeline and Link-Up programs.

DES-FAA has estimated an initial programming cost of $27,558 and an annual cost of $325,300 to determine eligibility status. The foregoing estimate of ongoing costs is based on a monthly application rate of 90,000, which may vary, and assumes that DES-FAA would only handle notification of eligibility status. Cost recovery options are addressed later in this report.

Although an electronic and online application for individual consumer enrollment was discussed, the Team believes that such an application would not have a significant impact on increasing enrollment because Lifeline benefits low-income consumers who may be less likely to have easy access to online resources. However, this premise should be re-examined after the completion of Phase I.

The Team also considered an electronic interface with a centralized database containing all qualified applicants in the state. An electronic interface such as this would allow individual ETCs to easily verify customer enrollment in Lifeline. The Team, however, decided that a single database containing all qualified individuals in the state was cost prohibitive.

(2) How other states' on-line electronic interfaces operate.

The Team examined automatic enrollment programs for Lifeline and Link-Up currently operating in four of the six states identified in the FCC Lifeline Order. The investigation found that each of the four state's automatic enrollment systems operates differently, including the interface, electronic or otherwise, between the telecommunications companies and the relevant state welfare agencies. Below is a short summary of four states' automatic enrollment systems and interfaces. For a more detailed discussion on each state's system, see Exhibit D.

In Massachusetts, the Department of Transitional Assistance modified its public assistance application to include a box that the applicant can check to receive Lifeline and Link-Up discounts and to release the applicant's information to the telephone companies for enrollment purposes. Once checked, the agency electronically sends the applicant's information to the telephone companies. The telephone companies then compare this information against their own customer records and enroll only their customers found on the information list.

In Nevada, the State Welfare Department electronically sends a report twice a year with names and addresses of those persons who are enrolled in public assistance programs to the telephone companies. This information is e-mailed to the appropriate ETCs based on zip code and telephone number. The companies review the report for two purposes: (1) to enroll customers who have become eligible for these discounts; and (2) to verify that their current Lifeline and Link-Up customers remain eligible.

In New York, the Office of Temporary and Disability Assistance ("OTDA") electronically sends a list of individuals who are eligible for Lifeline to the telephone companies in July and December of each year. These individuals are current OTDA clients receiving public assistance. The telephone companies then compare the OTDA client list with their own customer base. The telephone companies notify their eligible customers by letter stating that they will begin to receive the Lifeline discount unless the customer objects within 30 days.

When Texas first adopted an automatic enrollment program, it was similar to the current programs in Massachusetts and Nevada. In 2003, the Texas Commission created a third-party administrator, the Low Income Discount Administrator ("LIDA"). Each month, the Texas Human and Health Services Department sends LIDA its database of consumer names that are enrolled in public assistance programs and the telephone companies also send their customer database. LIDA then compares these two databases against each other to determine who is eligible to receive Lifeline and Link-Up discounts (but not currently enrolled) and who has become ineligible to receive these discounts. LIDA creates a list of these eligible or ineligible customers and sends it to each telephone company through secured electronic mail.

The Team believes that a combination of the methods above would best serve Arizona consumers immediately. This includes: (1) modifying DES' application to include Lifeline and Link-Up enrollment; (2) having DES compile the list of qualified applicants and continue to verify the eligibility of the applicants; and (3) having DES electronically send the list to the ETCs on a weekly basis.

(3) Whether such interfaces have had an impact on subscribership rates in these other states.

Although the answer to this question seems intuitive, it is difficult to isolate a single factor, such as electronic interfaces, to credit having an impact on subscribership rates. Multiple factors work together to increase subscribership rates, including the number of eligibility programs and criteria, automatic enrollment, electronic interfaces, third-party administrators, outreach efforts, and so on.

For example, automatic enrollment and electronic interfaces have made a significant impact on enrollment in Texas and New York. In Texas, telephone companies are required to file annual reports quantifying how many customers receive Lifeline and Link-Up discounts. After informally analyzing enrollment rates, a Texas Commission staff attorney concluded that enrollment increased approximately 30-35% in 2000 when Texas implemented automatic enrollment with an electronic interface. In 2004, Texas formed a third-party administrator and that same year Lifeline enrollment increased another 35% and Link-Up increased 43%.

In New York, penetration rates increased 35-40% with the introduction of automatic enrollment and electronic interfaces. However, while penetration among low-income households initially increased with the introduction of these factors, it subsequently fell as fewer families qualified. (See Exhibit E, testimony of Dr. Trudi J. Renwick, Ph.D. for the Public Utility Law Project). Dr. Renwick recommended that the number of qualifying programs must be increased to expand Lifeline and Link-Up enrollment even further. The Commission has already added several qualifying programs, such as TANF, NSL, KidsCare, and income level, as new eligibility criteria for Arizona Lifeline.

(4) Cost recovery options to cover the costs of an on-line interface of this nature.

DES-FAA's participation in the Team's meetings has been very instrumental and it is willing to implement measures that will bring Lifeline and Link-Up services to more Arizona residents. However, as may be expected, there are costs associated with implementation and the on-going administration. The initial start-up costs for Phase I are expected to be approximately

$27,558. The ongoing administrative costs of automatic enrollment for all ETCs are estimated to be at least $325,300 per year (see Exhibit C for more detailed cost analysis). The costs associated with Phase II are undetermined at this juncture and will require further analysis.

The Team considered several options for defraying the administrative costs of Phase I and concluded that funding from the Arizona Universal Service Fund ("AUSF") should be considered. The AUSF mechanism could be utilized to reimburse DES and/or the ETCs for administrative costs incurred in administering Phase I. This mechanism includes prescribed surcharges for obtaining the necessary funds and a fund administrator to oversee collection and disbursement. At present, the fund administrator is the National Exchange Carrier Association ("NECA"). In its current form, the Commission's AUSF rule prescribes three types of surcharges. Local telephone companies are assessed a flat monthly fee per access line, and toll providers are assessed a percentage of intrastate revenues. Both kinds of providers may, in turn, pass through their assessments to their subscribers. Similarly, a flat monthly charge is levied against wireless carriers' interconnecting trunks.

The three AUSF surcharges provide a fair and economical way of covering the administrative costs of Phase I. First, both wireline and wireless telephone subscribers benefit by adding more customers to the public switched network and keeping existing customers on the network. A larger network benefits all subscribers because they are able to reach and be reached by a larger number of persons. Second, the surcharges are broad-based. Because the surcharges are broadly applied to all classes of telephone users, there are few opportunities for users to escape paying the surcharges by subscribing to substitute services that are not assessed. Third, financing Phase I administrative costs using the AUSF surcharges will add little to NECA's current costs to administer the fund. DES and the ETCs would be able to submit to NECA proof of the costs they have incurred, and after reviewing those submissions, NECA could factor the associated costs into the size of the fund.

The Team considered and rejected several alternatives to using the current AUSF mechanism as a means of financing Phase I expenditures. One undesirable alternative is to subsume Phase I costs into the ETCs overall cost of doing business in Arizona. This alternative hides Phase I costs from consumers. Absorbing Phase I costs will force ETCs to attempt recovery throughout the full array of their products and services, and the ETCs' subscribers will be unaware of the extent to which their individual purchases are burdened by Phase I costs. Should an ETC be unable to obtain complete recovery throughout its price schedules and tariffs, then its shareholders and owners will unfairly bear a disproportionate burden of Phase I costs.

Another option the Team rejected is to finance Phase I costs by levying a surcharge on customers' bills separate and apart from the current AUSF surcharge. This approach has at least two disadvantages as compared to relying upon the existing AUSF mechanism. First, if adopted, it will further complicate consumers' bills by adding yet another surcharge. As is widely acknowledged, consumers frequently complain their telephone bills are already too complicated for them to understand. Second, ETCs would incur additional administrative costs associated with setting up, billing, collecting and keeping track of another surcharge, and the Commission would have to dedicate resources to review the reasonableness and monitoring the application of a new surcharge.

The Team also considered seeking legislation to finance the Phase I costs shouldered by DES. Such legislation, however, might introduce a new tax or it might require DES to get special budgetary authority to obtain funding through general tax revenues. Introducing a new tax has many of the same objections as establishing a new telephone surcharge, if not more. Giving some kind of special budgetary preference to funding DES' Lifeline and Link-Up activities may jeopardize DES' other vital functions. Moreover, the legislative approach is full of uncertainties and opportunities for delay. This method of financing was, therefore, rejected by the Team.

In the end, the significant advantage in using the AUSF mechanism is that the Commission has the authority to issue an order allowing immediate recovery through the AUSF. The rules governing AUSF funding are broad in nature. (A.A.C. R14-2-1201 *et seq.*) For example, A.A.C. R14-2-1203 broadly states that requests for AUSF funding should include a "statement describing the need for such funding." Allowing immediate cost recovery through the AUSF avoids the delay and uncertainty associated with seeking legislation and eliminates the need for a new and separate surcharge or retention of another fund administrator. Furthermore, Arizona would not be the first state to finance the cost of administering telephone assistance plans using a state universal service fund. As noted in Exhibit D, the Texas Universal Service Fund finances both the Lifeline and Link-Up discounts and the administrative costs of a third-party administrator.

(5) Whether centralized administration by DES of all ETC end-user assistance programs would be beneficial.

While centralized administration of all end-user programs is ideal, no agency in the State of Arizona is currently in a position to solely fulfill that role. As discussed earlier in this report, DES-FAA is in a position to handle centralized administration of programs, which serve approximately 77% of those qualifying for Arizona Lifeline. DES-FAA is in the best position of existing agencies to incorporate automatic enrollment—the single most effective tool for increasing participation in the Arizona Lifeline program.

(6) Outreach programs that should be implemented to increase subscribership in Arizona.

Implementing automatic enrollment for participants in AHCCCS, TANF, and Food Stamps provides automatic and immediate outreach to the estimated 77% of households qualifying for Arizona Lifeline.

In order to provide effective outreach to the additional 23% of qualifying households, the Team recommends a cooperative outreach campaign that targets the low-income community, including ACAA offices where individuals apply for LIHEAP as well as other locations. The Team suggests that bi-lingual posters and Lifeline brochures be developed to explain the Arizona Lifeline program, list participating ETCs, and include a generic Arizona Lifeline application form acceptable by all ETCs. This information could be displayed in the 37 ACAA offices located throughout the state, as well as additional offices which are under contract to the ACAA (see Exhibit F). This information, as well as the generic Lifeline application, could also be posted on websites such as www.arizonaselfhelp.org and www.azcaa.org. It is envisioned that the various ETCs could help fund this cooperative outreach effort, proportionate to the number of residential customers they serve in the state.

In addition to this cooperative program, each ETC will continue its own outreach efforts, in addition to what is currently being done. Implementation of the Team's Phase II program could further improve outreach efforts in Arizona.

The Team requests that the Commission expeditiously adopt and implement the recommendations in this report. The Team recommends April 30, 2006 as the target date for implementation of Phase I to enable the ETCs to improve Lifeline enrollment in Arizona in the near term.

CONCLUSION

The Arizona Lifeline Team has developed what it believes is a viable plan for expanding the Arizona Lifeline and Link-Up programs to reach more eligible consumers and to facilitate the use of over $38 million in annual federal aid for the benefit of low-income consumers. Engaging DES-FAA to act as a centralized agency to enroll over 400,000 households in the program is a key component to the overall recommendation. Implementing this recommendation requires a cost recovery mechanism to ensure that all of the ETCs and their customers benefit from DES-FAA's efforts. The Team recommends that the Commission issue an order allowing for the recovery of Phase I administrative costs through the AUSF.

Once a source of funding has been determined, the Team recommends that the Commission appoint a standing subgroup to work through all of the programming and implementation details associated with the DES-FAA automatic enrollment recommendation and the cooperative outreach plan in Phase I.

Wherefore, the following Eligible Telecommunications Carriers support the recommendations in this Lifeline Report:

Accipiter Communications Incorporated
Arizona Telephone Company
Century Telephone of the Southwest, Inc.
Citizens Telecommunications Company of the White Mountains
Citizens Utilities Rural Company, Inc.
Copper Valley Telephone
Midvale Telephone Exchange, Incorporated
Navajo Communications Co., Inc.
Qwest Corporation
Rio Virgin Telephone Company
South Central Utah Telephone Association
Southwestern Telephone Company
Table Top Telephone Company
Valley Telephone Cooperative, Inc.
Verizon California, Inc.
Smith Bagley, Inc.
Sprint Spectrum Limited Partnership
Telscape Communications, Inc.

SIGNATURE PAGE

WHEREFORE, the undersigned agents for the following Eligible Telecommunications Carriers support the recommendations in this Lifeline Report.

ACCIPITER COMMUNICATIONS INCORPORATED, a Nevada corporation

By: Charles Gowder
Name: Charles Gowder
Title: President/CEO
Date: 12/16/05

Comments:

ARIZONA TELEPHONE COMPANY, an Arizona company

By:______________________________
Name:____________________________
Title:_____________________________
Date:_____________________________

Comments:

CENTURY TELEPHONE OF THE SOUTHWEST, INC, a New Mexico corporation

By:______________________________
Name:____________________________
Title:_____________________________
Date:_____________________________

Comments:

SIGNATURE PAGE

WHEREFORE, the undersigned agents for the following Eligible Telecommunications Carriers support the recommendations in this Lifeline Report.

ACCIPITER COMMUNICATIONS INCORPORATED, a Nevada corporation

By:__________________________________
Name:_______________________________
Title:________________________________
Date:________________________________

Comments:

ARIZONA TELEPHONE COMPANY, an Arizona company

By: John Zeiler
Name: John Zeiler
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Date: 12/21/05

Comments:

CENTURY TELEPHONE OF THE SOUTHWEST, INC, a New Mexico corporation

By:__________________________________
Name:_______________________________
Title:________________________________
Date:________________________________

Comments:

SIGNATURE PAGE

WHEREFORE, the undersigned agents for the following Eligible Telecommunications Carriers support the recommendations in this Lifeline Report.

ACCIPITER COMMUNICATIONS INCORPORATED, a Nevada corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

ARIZONA TELEPHONE COMPANY, an Arizona company

By:____________________
Name:____________________
Title:____________________
Date:____________________

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Date: 12/19/05

Comments:

COPPER VALLEY TELEPHONE, an Arizona corporation

By:__________
Name:__________
Title:__________
Date:__________

Comments:

MIDVALE TELEPHONE EXCHANGE, INCORPORATED, an IDAHO corporation

By:__________
Name:__________
Title:__________
Date:__________

Comments:

CITIZENS TELECOMMUNICATIONS COMPANY OF THE WHITE MOUNTAINS, a Delaware company

By:__________________________________
Name:________________________________
Title:_________________________________
Date:_________________________________

Comments:

CITIZENS UTILITIES RURAL COMPANY, INC., a Delaware corporation

By:__________________________________
Name:________________________________
Title:_________________________________
Date:_________________________________

Comments:

COPPER VALLEY TELEPHONE, an Arizona corporation

By: [signature]
Name: Kimberly A. Grouse
Title: Attorney for Copper Valley Telephone
Date: 12/21/05

Comments:

MIDVALE TELEPHONE EXCHANGE, INCORPORATED, an IDAHO corporation

By:__________________________________
Name:________________________________
Title:_________________________________
Date:_________________________________

Comments:

CITIZENS TELECOMMUNICATIONS COMPANY OF THE WHITE MOUNTAINS, a Delaware company

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

CITIZENS UTILITIES RURAL COMPANY, INC., a Delaware corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

COPPER VALLEY TELEPHONE, an Arizona corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

MIDVALE TELEPHONE EXCHANGE, INCORPORATED, an IDAHO corporation

By: K Ellison
Name: Karen J. Ellison
Title: C.E.O.
Date: December 16, 2005

Comments:

NAVAJO COMMUNICATIONS CO., INC., a New Mexico corporation

By: Curt Huttsell
Name: Curt Huttsell
Title: Mgr. - Gov't. & External Affairs
Date: 12/19/05

Comments:

QWEST CORPORATION, a Colorado corporation

By:___
Name:___
Title:___
Date:___

Comments:

RIO VIRGIN TELEPHONE COMPANY, a Nevada company

By:___
Name:___
Title:___
Date:___

Comments:

SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, a Utah non-profit *association*

By:___
Name:___
Title:___
Date:___

Comments:

NAVAJO COMMUNICATIONS CO., INC., a New Mexico corporation

By:______________________________
Name:____________________________
Title:_____________________________
Date:_____________________________

Comments:

QWEST CORPORATION, a Colorado corporation

By: Carol Rohrkemper
Name: CAROL ROHRKEMPER
Title: MANAGER - TELEPHONE ASST. PLANS
Date: 12-19-2005

Comments:

RIO VIRGIN TELEPHONE COMPANY, a Nevada company

By:______________________________
Name:____________________________
Title:_____________________________
Date:_____________________________

Comments:

SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, a Utah non-profit association

By:______________________________
Name:____________________________
Title:_____________________________
Date:_____________________________

Comments:

NAVAJO COMMUNICATIONS CO., INC., a New Mexico corporation

By:____________________________
Name:__________________________
Title:___________________________
Date:___________________________

Comments:

QWEST CORPORATION, a Colorado corporation

By:____________________________
Name:__________________________
Title:___________________________
Date:___________________________

Comments:

RIO VIRGIN TELEPHONE COMPANY, a Nevada company

By: [signature]
Name: HAROLD OSTER
Title: AREA MANAGER
Date: 12-20-05

Comments:

SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, a Utah non-profit association

By:____________________________
Name:__________________________
Title:___________________________
Date:___________________________

Comments:

NAVAJO COMMUNICATIONS CO., INC., a New Mexico corporation

By:________________________________
Name:______________________________
Title:_______________________________
Date:_______________________________

Comments:

QWEST CORPORATION, a Colorado corporation

By:________________________________
Name:______________________________
Title:_______________________________
Date:_______________________________

Comments:

RIO VIRGIN TELEPHONE COMPANY, a Nevada company

By:________________________________
Name:______________________________
Title:_______________________________
Date:_______________________________

Comments:

SOUTH CENTRAL UTAH TELEPHONE ASSOCIATION, a Utah non-profit association

By: [signature]
Name: BRANT BARTON
Title: CEO / General Manager
Date: 12-20-05

Comments:

SOUTHWESTERN TELEPHONE COMPANY, an Arizona company

By: John Zeiler
Name: John Zeiler
Title: Mgr - External Relations
Date: 12/21/05

Comments:

TABLE TOP TELEPHONE COMPANY, a Nevada corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

VALLEY TELEPHONE COOPERATIVE, INC., an Arizona non-profit corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

VERIZON CALIFORNIA, INC., a California corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

SOUTHWESTERN TELEPHONE COMPANY, an Arizona company

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

TABLE TOP TELEPHONE COMPANY, a Nevada corporation

By: W J Hayes
Name: W. J. HAYES
Title: General Manager
Date: Dec 20 2005

Comments:

VALLEY TELEPHONE COOPERATIVE, INC., an Arizona non-profit corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

VERIZON CALIFORNIA, INC., a California corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

SOUTHWESTERN TELEPHONE COMPANY, an Arizona company

By:____________________________
Name:__________________________
Title:___________________________
Date:___________________________

Comments:

TABLE TOP TELEPHONE COMPANY, a Nevada corporation

By:____________________________
Name:__________________________
Title:___________________________
Date:___________________________

Comments:

VALLEY TELEPHONE COOPERATIVE, INC., an Arizona non-profit corporation

By: [signature]
Name: Kimberly A Grouse
Title: Attorney for Valley Telephone Cooperative
Date: 12/21/05

Comments:

VERIZON CALIFORNIA, INC., a California corporation

By:____________________________
Name:__________________________
Title:___________________________
Date:___________________________

Comments: Verizon California, Inc. reserves its rights to further comment on the development, implementation, and evaluation of any program adopted to increase Lifeline and Link-Up enrollment in Arizona.

SOUTHWESTERN TELEPHONE COMPANY, an Arizona company

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

TABLE TOP TELEPHONE COMPANY, a Nevada corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

VALLEY TELEPHONE COOPERATIVE, INC., an Arizona non-profit corporation

By:____________________
Name:____________________
Title:____________________
Date:____________________

Comments:

VERIZON CALIFORNIA, INC., a California corporation

By: Donald Eachus
Name: DONALD EACHUS
Title: SENIOR STAFF CONSULTANT
Date: December 20, 2005

Comments: Verizon California, Inc. reserves its rights to further comment on the development, implementation, and evaluation of any program adopted to increase Lifeline and Link-Up enrollment in Arizona.

Donald Eachus

SMITH BAGLEY, INC., a District of Columbia corporation

By: Carl J. Wibel
Name:
Title:
Date:

Comments:

SPRINT SPECTRUM LIMITED PARTNERSHIP, a Delaware limited partnership

By:
Name:
Title:
Date:

Comments:

TELSCAPE COMMUNICATIONS, INC., a Delaware corporation

By:
Name:
Title:
Date:

Comments:

SMITH BAGLEY, INC., a District of Columbia corporation

By:__________________________________
Name:________________________________
Title:_________________________________
Date:_________________________________

Comments:

SPRINT SPECTRUM LIMITED PARTNERSHIP, a Delaware limited partnership

By: Mark D. Koval
Name: MARK D. KOVAL
Title: REGULATORY AFFAIRS MANAGER
Date: DECEMBER 19, 2005

Comments:

TELSCAPE COMMUNICATIONS, INC., a Delaware corporation

By:__________________________________
Name:________________________________
Title:_________________________________
Date:_________________________________

Comments:

SMITH BAGLEY, INC., a District of Columbia corporation

By:____________________________
Name:__________________________
Title:___________________________
Date:___________________________

Comments:

SPRINT SPECTRUM LIMITED PARTNERSHIP, a Delaware limited partnership

By:____________________________
Name:__________________________
Title:___________________________
Date:___________________________

Comments:

TELSCAPE COMMUNICATIONS, INC., a Delaware corporation

By: [signature]
Name: Diana Aguirre
Title: Regulatory Administrator
Date: 12-16-05

Comments:

EXHIBIT A

EXHIBIT A: Arizona Lifeline Team Membership, Participants, and Meeting Dates

I. Team Members: Arizona Eligible Telecommunications Carriers

a. ILECs

- Accipiter Communications
  - Charles Gowder, President/CEO
- Arizona Telephone Company
  - John Zeiler, Manager – External Relations
- Century Telephone of the Southwest
  - Edie Ortega, Director of Government Relations
- Citizens Telecommunications Company of the White Mountains
  - Curt Huttsell, Manager – Government & External Affairs
- Citizens Utilities Rural Company
  - Curt Huttsell, Manager – Government & External Affairs
- Copper Valley Telephone
  - Steve Metts, CEO
  - ALECA member, represented by Karen Ellison
- Midvale Telephone Exchange
  - Karen J. Ellison – CEO & President of ALECA
- Navajo Communications
  - Curt Huttsell, Manager – Government & External Affairs
- Qwest Corporation
  - Carol Rohrkemper, Manager – Telephone Assistance Plans (Arizona Lifeline Team Chairperson)
  - Monica Luckritz, Staff Advocate – Public Policy
  - Norm Cutright - Counsel
- Rio Virgin Telephone Company
  - Harold Oster, General Manager
- South Central Utah Telephone Association
  - Brant Barton, CEO / General Manager

- Southwestern Telephone Company
    - John Zeiler, Manager - External Relations

- Table Top Telephone Co., Inc.
    - Lisa Rossi, Customer Service & Marketing Manager

- Valley Telephone Cooperative
    - Steve Metts, CEO
    - ALECA member, represented by Karen Ellison

- Verizon California, Inc.
    - Lorraine Kocen, Specialist – Regulatory Policy & Planning

b. CLECs and Wireless

- Smith Bagley Inc., d/b/a Cellular One of NE AZ
    - Carl Wibel, Project Coordinator - Network Development

- Sprint Spectrum L.P
    - Lil Taylor, Regulatory Affairs Manager

- Telscape Communications, Inc.
    - Diana Aguirre, Regulatory Administrator

II. Participants

a. Arizona DES – Community Services Administration
    - Mary Ellen Kane
    - Sandra Mendez

b. Arizona DES – Family Assistance Administration
    - Rick Anderson, DBME Systems Administrator
    - Kathy Montano, Executive Staff Assistant to the Assistant Director

c. ACC Staff
    - Richard Boyles, Utilities Engineer
    - Brad Morton, Public Utilities Consumer Analyst II
    - Maureen Scott, Attorney

d. Arizona Community Action Association
    - Cynthia Zwick, Executive Director

e. Snell & Wilmer L.L.P.
    - Kimberly A. Grouse
    - Marcie Montgomery

III. Schedule of Team Meetings

July 15, 2005

August 10, 2005

August 24, 2005

September 15, 2005

October 4, 2005

October 19, 2005

November 1, 2005

November 7, 2005

November 15, 2005

December 8, 2005

EXHIBIT B

CASE NUMBER:

MAILED DATE:

N D DEPARTMENT OF HUMAN SERVICES

02

HOME TELEPHONE ASSISTANCE CERTIFICATE

Dear

You have received this certificate because you are eligible to participate in the Link Up and Telephone Assistance programs. The Link Up program assists with initial telephone hook up costs. The Telephone Assistance program will pay a part of your monthly local telephone service (not long distance calls or service).

To access the Link Up and Telephone Assistance programs, complete this certificate and mail or deliver it to your local telephone company. In the spaces below, enter your telephone number (if you have one), the name of the individual responsible for the bill, your signature, and the date. If you do not have a telephone, please provide your name, signature and the date.

Case Name:
Telephone number: ________ Billing name ______

Eligible applicant's signature ________ Date ______

Your local telephone company will verify your continued eligibility once per year.

If your local telephone service is provided by Qwest Communications, mail this certificate to PO BOX 2738, Omaha NE 68103-2738. Otherwise, send or deliver this completed certificate to your local telephone company.

Most telephone companies in North Dakota participate in the Telephone Assistance program. If you have questions about Link Up or Telephone Assistance, contact your telephone company. The North Dakota Public Service Commission can also answer your questions at 701-328-2400.

KGHTS TO A HEARING

If you believe the decision contained in this notice is incorrect, you may request a hearing before the North Dakota Department of Human Services. Contact your county social service office for instructions on how to request a hearing. You must request a hearing in writing within 30 days from the date of this notice for Medicaid. For Food Stamps, a request for hearing must be made orally or in writing within 90 days from the date of this notice.

If your request for a hearing is made within 10 days (five days in the event of probable fraud in Medicaid), the action described on the reverse side of this notice will not be taken pending the hearing decision unless:

(1) notice is not required,
(2) you withdraw your request for the hearing,
(3) you fail to apper at a scheduled hearing, or
(4) it is decided that the only issue in the appeal is one of federal or state law or policy.

You are advised, however, that if the hearing decision by the Department of Human Services is not in your favor, the total additional amount paid to you or on your behalf will be considered an overpayment subject to recovery.

You can have an attorney, relative, friend or any other person assist you in your hearing. If you would like an attorney to help, but do not have the money to pay an attorney, you can contact one of the free legal service organizations in your area to see if they can assist you. If you would like one of these organizations to represent you at your hearing, it is advisable that you contact them as soon as possible. The North Dakota Department of Human Services makes this listing of Legal Aid organizations available for your use.

NONDISCRIMINATION

In accordance with Federal law, U.S. Department of Agriculture (USDA) policy and U.S. Department of Health and Human Services (HHS) policy, this institution is prohibited from discriminating of the basis of race, color, national orgin, sex, age, disability, religion or political beliefs. To file a complaint of discrimination, contact the USDA or HHS. Write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (202) 720-5964 (voice and TDD). Write HHS Director, Office for Civil Rights, Room 506-F, 200 Independence Avenue, S.W., Washington D.C. 20201 or call (202) 619-0403 (voice) or (202) 619-3257 (TDD). USDA and HHS are equal opportunity providers and employers.

RESPONSIBILITY TO REPORT CHANGES

UNDER PENALTY OF LAW, IT IS THE APPLICANT'S/RECIPIENT'S RESPONSIBILITY TO REPORT TO THE COUNTY SOCIAL SERVICES OFFICE ANY CHANGE IN INCOME, ASSETS, ADDRESS, LIVING ARRANGEMENT, THE NUMBER OF PERSONS LIVING IN THE HOME, THE RETURN HOME OF A HUSBAND/WIFE, A CHILD'S DROPPING OUT OF SCHOOL, ETC.

- CHANGES MUST BE REPORTED WITHIN TEN DAYS by contacting the county social services office to verbally report a change, by writing to the county social service office, or by completing the Change Report Form.

EXHIBIT C

EXHIBIT C: DES-FAA Cost Estimates Associated with Automatic Enrollment

DES/FAA was asked to estimate the automation and implementation effort necessary for the categorically eligible referrals to the ETC's. The following narrative describes how the FAA arrived at the estimates:

Automation

To send changes from one ETC to another, one new data element needs to be added to an existing data base file. This requires efforts from the application side for both the technical and user teams as well as efforts from the Data Base Administration and the Technical Support areas in the form of re-organizing files to allow for the additional data element. Application programming and user testing have the lion's share of the automation effort to select the correct records for transmission, and to install necessary cross relational editing to ensure data integrity. The total automation effort has been estimated at 1,043 person hours at a total cost of $27,557.97.

Policy and field staff notification/training effort

The policy effort of eight person hours consists of adding a question to the application for assistance, developing the policy and procedure, and drafting the field notifications for implementation. The policy unit cost has been estimated at $250.86.

Eligibility Costs

The interface design that has been discussed calls for a Lifeline eligibility determination each time an application for assistance is received. This means the Eligibility Interviewer ("EI") would need to examine the potential Lifeline eligibility for both initial applications and all re-determinations (for new phone service, changes or terminations). We have estimated this activity at approximately one minute per application received. This activity would consist of discussing the Lifeline program with the client, determining if the client is with an ETC (or may be known to multiple ETC's) and correctly updating the data in the eligibility system. One minute of an EI's salary is worth $.30 times 90,361 applications received per month (or 1,084,332 apps received per year) for an annual cost of $325,300.00.

One Time Cost Estimate for DES-FAA:	$27,808.83
On-going, Annual Cost Estimate for DES-FAA:	$325,300.00*

* On-going Annual Cost Estimate does not include costs associated with handling customer calls associated with their Lifeline enrollment and status. Whether or not DES would be responsible for handling customer inquiries has yet to be determined.

EXHIBIT D

EXHIBIT D

The task force group examined automatic enrollment programs for Lifeline and Linkup currently operating in four states. This task force group looked into how these automatic enrollment programs function. Below is a summary of our research highlighting four automatic enrollment states: Massachusetts, Nevada, New York, and Texas.

1. Massachusetts

The Massachusetts Department of Transitional Assistance modified its public assistance application to include a privacy waiver to release customer eligibility information and enroll into Lifeline and Linkup. Applicants have to check a box on the application to release their information and enroll. Once checked, the agency releases the applicant's information to the telephone companies. The telephone companies then compare this information against their own customer records and enroll only their customers found on the information list. Telephone companies have signed confidentiality agreements limiting the use of customer information.

The Massachusetts Department of Telecommunications and Energy ("MDTE") is currently working with telephone companies to establish an automated program of matching customer records like the program used by electric and gas companies. Electric and gas companies were ordered by MDTE to electronically transfer customer account information on a quarterly basis to the Executive Office of Health and Human Services ("EOHHS"). Then, EOHHS matches the customer account information with information in its database of recipients of public benefits programs in order to identify customers who are eligible for Lifeline and Linkup. EOHHS returns a list of eligible customers to the electric and gas companies and these companies enroll the customers.

2. Nevada

The Nevada State Legislature passed a law allowing the Nevada State Welfare Department ("Welfare Department") to release information to telephone companies. The Welfare Department issues a report twice year with names and addresses of those persons who are enrolled for assistance programs. Social security numbers are not used.

The telephone companies then review the report for their customer names to verify that current Lifeline and Linkup customers remain eligible to receive the discounts and to enroll customers who have become eligible. For those who are eligible but are not currently enrolled in Lifeline and Linkup, the telephone companies may contact those individuals on the report whether or not they are a current customer.

Individuals who are not currently receiving public assistance but still qualify for Lifeline or Linkup may contact the telephone company directly to sign up for Lifeline and Linkup.

3. New York

The New York Public Service Commission, the New York Department of Family Assistance ("NYDFA"), and NYNEX (now Verizon) helped create an automatic enrollment database. The Office of Temporary and Disability Assistance ("OTDA"), one of two offices within NYDFA, is charged with transferring customer confidential information to the telephone companies for Lifeline enrollment. In July and December of each year, OTDA sends a report to the telephone companies listing individuals who are eligible for Lifeline. These individuals are current OFTDA clients receiving public assistance. The telephone companies have entered into confidentiality agreements with NYDFA stating that the telephone companies will only use the OTDA list for Lifeline purposes.

The telephone companies then compare the OTDA list with their own customer base. The telephone companies notify their eligible customers by letter stating that they will begin to receive Lifeline discount unless the customer objects within 30 days.

4. Texas

In Texas, the Texas State Legislature promulgated two statutes, Sections 55.015 and 56.021, ordering the Texas Commission to implement rules for automatic enrollment of Lifeline and Linkup. Specifically, Section 55.015 calls for the Texas Commission to adopt rules providing for automatic enrollment of Lifeline service for eligible customers. Section 56.021 empowers the Texas Commission to adopt and enforce rules requiring local exchange companies to establish a universal service fund to reimburse telephone companies providing Lifeline service.

With this authority, the Texas Commission worked with the Texas Human and Health Services Department ("THHSD") to establish an automatic enrollment program. At first, the idea was to have the telephone companies use THHSD's database to determine who needs to be enrolled in Lifeline and Linkup. Before this could happen, THHSD had to get permission to release the information in that database from the federal agency over them. To get this permission, THHSD had to enter into confidentiality agreements with the telephone companies indicating that the use of the database information was only for Lifeline and Linkup programs. In addition, the Texas State Legislature was concerned about the use of social security numbers, so only names and other identification indicators are used in the database.

In 2003, the Texas Commission amended Section 26.412 – the rules relating to Lifeline and Link Up service programs – to improve the automatic enrollment program. The 2003 amendments created a third-party administrator, the Low Income Discount Administrator ("LIDA").[1]

a. *LIDA: General Overview*

LIDA's primary role is to collect the names of customers from the telephone companies who are enrolled in Lifeline and Linkup and compare them to the names listed in the THHSD database. LIDA also entered into a confidentiality agreement regarding the proper uses of the database. The amendments to Section 26.412 states that the functions of LIDA will be established in more detail in the "Low-Income Discount Procedural Guide." Although a draft of this Guide was created, it never became official. Regardless, the telecommunication companies' IT administrators worked out the details with LIDA and established the necessary procedure.

[1] Project No. 28056, Order Adopting Amendments to §26.412 As Approved at the December 30, 2003 Open Meeting (Dec. 2003).

b. *LIDA's Relationship with the Texas Commission*

LIDA contracts with the Texas Commission. Every few years the contract changes and is updated. Companies bid for the contract making it a competitive process. National Exchange Carriers Association ("NECA") received the most recent contract from the Texas Commission. NECA also administers the Texas Universal Fund Services ("TUSF").

c. *Funding for LIDA*

The Lifeline and Linkup discounts as well as the administration costs of LIDA are funded through TUSF.

d. *How LIDA Operates*

THHSD sends LIDA its database of consumer names that are enrolled in public assistance programs. The telephone companies also send their customer database to LIDA. This is done on a monthly basis. LIDA then compares these two databases against each other to determine who is eligible to receive Lifeline and Linkup discounts (and not currently enrolled) and who has become ineligible to receive these discounts. LIDA creates a list of these eligible or ineligible customers and sends it to each telephone company. This customer list does not include names of those who are currently enrolled in Lifeline and Linkup and remain eligible for these discounts. Once the companies receive the LIDA list, they can adjust the billing rates for their customers identified on the list.

For customers who no longer qualify to receive the discounts, LIDA follows certain procedures before the customer can be dropped from the discount programs. LIDA first determines that the customer is not eligible to continue to receive the discounts by comparing databases as described above. Next, LIDA sends a letter to the customer explaining its position and allows the customer to submit documentation to prove that he/she should continue to receive the discount. The letter includes a 1-800 number that the customer can call to ask about the qualifications to receive the discounts. Notably, LIDA – not the telephone companies – handles correspondence with customers regarding Lifeline and Linkup. LIDA then requires the customer to submit self-service forms and provide verification that shows continuing eligibility. If the customer cannot provide any verification, the customer's name is removed from the LIDA database after 60 days from the date of notification. LIDA then advises the telephone companies that the customer is no longer eligible to receive the discount. At that point, telephone companies can remove the discount from the customer's account.

e. *Linkup Customers*

Consumers who do not have phone lines or who are not in LIDA's database can still receive the benefits of Lifeline and Linkup if they qualify. Usually these consumers are not enrolled in any public assistance program but are 150% below the poverty line. These consumers must call LIDA using the 1-800 number to request a self-service form. The consumer then fills out and returns the form with supporting documentation. If LIDA determines that the consumer is qualified, LIDA enters the consumer's name into its database. Within 60 days, the consumer should be enrolled in Lifeline and Linkup.

The majority of Linkup customers are not new customers, but rather are current Lifeline customers who move and need service established at their new residence. Only 10-15% of Linkup customers are brand new telephone customers.

f. *Penetration Rate*

Automatic enrollment has made a very significant impact on Texas' state enrollment. Telephone companies are required to file annual reports that quantify how many customers receive the discounts. Texas Commission staff attorney, Janice Irvine informally reviewed all company reports and analyzed penetration rates for the last few years. According to Ms. Irvine, Lifeline and Linkup enrollment significantly increased approximately 30-35% once Texas implemented automatic enrollment with an electronic interface in 2000. In 2004, Lifeline enrollment increased another 35% and Linkup increased 43%. Both increases are credited to having LIDA administer the program instead of the telephone companies.

Consumer groups have pointed out at least one "downfall" with LIDA. LIDA removes customers faster from these discount programs than in the past. LIDA usually removes customers who are no longer eligible within 60 days. When companies administered the program, companies removed customers much slower. The Texas Commission expects that enrollment statistics will flatten since more customers are already enrolled in the programs and LIDA can remove ineligible customers quicker.

EXHIBIT E

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Proceeding on Motion of the Commission To Consider Cost Recovery by Verizon and to Investigate the Future Regulatory Framework	Case 00-C-1945

Testimony of Dr. Trudi J. Renwick, Ph.D.

for the

Public Utility Law Project

February 14, 2002

Case 00-C-1945
Testimony of Trudi J. Renwick
February 14, 2002
for the Public Utility Law Project

Q. Please identify yourself?

A. My name is Trudi J. Renwick.

Q. By whom are you employed?

A. I am employed by the Fiscal Policy Institute as a Senior Economist.

Q. What is your educational background and experience?

A. Attached to this testimony as Exhibit A is a copy of my <u>curriculum vitae.</u>

Q. Are you familiar with the Telephone Lifeline program?

A. Yes, in New York for Verizon customers, the current tariff provides basic residential service at a significant discount to qualifying low-income customers. The funds to supply this discount come first from the federal government through the universal service surcharge collected from all telephone customers and, at the State level, through the Targeted Assistance Fund that is also supported by telephone customers.

Q. What is the purpose of the telephone Lifeline program?

A. The purpose of the Lifeline program is to raise the penetration of telephone usage by reducing by a significant degree the economic barriers to telephone subscribership for low-income customers. The benefits from this increased subscribership flow to the customers who are able to participate as well as to other customers who then have the ability to reach additional customers over the switched network and to society in general because of the benefits and increased functionality for households that are able to maintain telephone service.

Q. How is eligibility for assistance from the Telephone Lifeline program determined?

A. Customers are eligible for Lifeline benefits if they qualify for one of eight government assistance programs. Several of these programs are identified by the federal government in its design for the minimum program that states must implement to qualify for federal universal service support. After states meet this minimum requirement, a state may choose to add additional programs to qualify additional low-income customers for Lifeline benefits. New York already has exercised its option to utilize an expanded list of programs to establish eligibility.

Q. What programs currently qualify a household or individual for Telephone Lifeline assistance in New York?

A. In New York, the programs are:

- Family Assistance
- Food Stamps
- Home Energy Assistance Program (HEAP)
- Medicaid
- Safety Net Assistance
- Supplemental Security Income (SSI)
- Veteran's Disability Pension (non-service related)
- Veteran's Surviving Spouse Pension (non-service related)

Q. Which of these programs are not required by the federal regulations?

A. Family Assistance, Safety Net Assistance, Veteran's Disability Pension, and Veteran's Surviving Spouse Pension.

Q. Is the qualification for these programs income based?

A. Yes.

Q. What are the income limits for the HEAP program in New York?

A. The income limits for the HEAP program in New York are $2,510 per month for a family of three and $2,988 per month for a family of four.

Q. What are the income limits for the Family Assistance program in New York?

A. The income limits for the Family Assistance program are based on the New York State standard of need which varies by county, family size and type of heating fuel. For a family of three in New York City with heat included in their rent, the Family Assistance income limit is $577 per month.

Q. What are the income limits for the Food Stamp program in New York?

A. The income limits for the food stamp program in New York are $1,585 per month for a three-person family and $1,912 for a four-person family.

Q. What are the income limits for the Medicaid program in New York?

A. The income eligibility limits for Medicaid in New York vary by family and applicant type, e.g. adults, pregnant women and children. As of January 1, 2001, the income eligibility limits for pregnant women and children were $909 per month for a three-person family and $917 per month for a four-person family. Adult income eligibility limits for the Medicaid program vary by county.

Q. What are the income limits for the Safety Net Assistance program in New York?

A. The income limits for the Safety Net Assistance program in New York are the same as the income limits for the Family Assistance program.

Q. What are the income limits for the SSI disability program in New York?

A. The monthly income limits for the SSI disability program in New York were $549 for an individual and $873 for a couple in 2000. For 2002, the income limits for the SSI disability program in New York were $632 per month for individuals and $921 per month for couples living independently.

Q. What are the income limits for the Veteran's Disability Pension program and the Veteran's Surviving Spouse Pension program in New York?

A. The income limits for the Veteran's Disability Pension program are $1,178 per month for a three-person family and $1,315 per month for a four-person family. The income limits for the Veteran's Surviving Spouse Pension program in New York are $835 per month for a three-person family and $971 per month for a four-person family.

Q. What is the enrollment history for the Telephone Lifeline program in New York?

A. After the introduction of automatic enrollment, New York greatly expanded the enrollment of low-income customers in the Lifeline program. The most recent data from the Federal Communications Commission reports the percentage of households in March 2000 having telephone service for individual states and for the nation. According to this data, 92% of New Yorkers with annual household incomes less than $16, 676 had telephone service, while for the nation as a whole only 87.5% of this population had service. For those with incomes less than $33,352, which includes most of those often characterized as the "working poor", the percentage with telephone service was 96.9% in New York compared with 93.3% in the nation. <u>See</u>, "Telephone Penetration by Income by State (Data Through 2000)", Alexander Belinfante, Industry Analysis Division, Common Carrier Bureau, Federal Communications Commission (July 2001).

Q. Don't these statistics demonstrate that the Verizon Lifeline program has been very successful?

A. These statistics show that the program has succeeded in accomplishing its goal of increased telephone subscribership among low-income households and has been more successful in this effort than other states. Other data indicates, however, that the New York program has lost a substantial portion of its effectiveness and has not adapted to the changing public assistance environment since its inception.

Q. When and at what level did enrollment for the Telephone Lifeline program peak?

A. I understand from Verizon's response to PULP's information requests that Verizon's Lifeline subscribership was more than 720,000 customers in December 1996. In comments filed with the Federal Communications Commission, the Universal Service Company reported that Lifeline enrollment in New York in the fourth quarter of 2001 had fallen to 586,000. I understand from the Verizon responses that enrollment has declined further and, as of December 2001, stood at 452,000 customers. Assuming that Lifeline subscribership was never higher than 720,000 customers and has declined no further since December 2001, this is a 37% decline in Lifeline participation over this period.

Q. Is this data the reason you conclude that the performance of the Lifeline program in New York has degraded in recent years?

A. Yes. The loss of over 274,000 customers from the program is a very substantial decline in effectiveness. Some of these customers undoubtedly lost service altogether. Others maintained service by paying the regular residential rate. For flat rate customers, this increased their bills by $9.11 per month. For measured rate customers, the increase was $10.11 per month.

Q. Can you estimate the additional revenue that Verizon received because of the migration of customers from Lifeline to basic residential service?

A. Not precisely, but I believe it is unlikely that Verizon received any additional revenue. This is because, from Verizon's point of view, the difference between the charges for Lifeline and non-Lifeline service is made up from the federal Universal Service Fund and from the State Targeted Assistance Fund. Any revenue gain from a transfer of a customer from Lifeline to non-Lifeline basic service would be offset by revenue losses from reduced federal or State support money.

Q. How much federal support is lost when a customer switches from Lifeline to non-Lifeline service?

A. For measured rate customers, the loss to the State is $7.87 per month, for flat rate customers, the loss is $7.54 per month. To provide a rough estimate, if we assume that the 250,000 customers who lost Lifeline service were evenly divided between flat rate and measured rate service, the annual loss in federal revenue was $1,926,500 per month or $23,115,000 per year.

Q. Do you perceive a trend or pattern to this enrollment decline?

A. Yes, enrollment in the Verizon Lifeline program has been declining steadily.

Q. Do you attribute this loss in enrollment to actions that Verizon has taken?

A. No. I assume that Verizon has administered the program in the same way throughout this period, and I have no information to suggest that Verizon's administrative practices or procedures are responsible for this precipitous decline in enrollment.

Q. To what do you attribute the significant decline in Lifeline enrollment in New York?

A. In New York, customers qualify for Lifeline because of their participation in one or more of several programs providing assistance for low-income households. These programs each have another programmatic purpose, i.e., they are administered to provide some assistance other than inexpensive telephone service. These programs are used, however, to identify the low-income households that the Lifeline program is designed to assist, and the significant advantage of using existing programs to do this is in the avoidance of separate means determinations for each prospective Lifeline customer. In this way, very large numbers of Lifeline eligible customers can be identified and helped with very low administrative costs. In recent years, however, several of the programs that are being used for this purpose have changed.

Q. In what way have these programs changed?

A. The enactment of the Personal Responsibility and Work Opportunity Reconciliation act of 1996 (PRWORA) marked an extraordinary turning point in U.S. social policy. The legislation is probably best known for having repealed the Aid to Families with Dependent Children Program and having provided states with block grants to design work-focused, time-limited welfare programs. The law reduced federal requirements and protections for individuals while expanding state discretion and flexibility in numerous aspects of social policy. The law also made major changes affecting child support enforcement, childcare, the Food Stamp Program, disability benefits for children, and the eligibility of immigrants for federal, state and local benefits.

Q. Has this resulted in changes in the enrollment for the Lifeline qualifying programs?

A. In New York, as in other states, enrollment in several of these programs has fallen significantly. Family Assistance caseloads in New York State have fallen from 393,424 in January 1997 to 207,259 in September 2001. Safety Net Assistance cases have declined from 200,309 to 99,516 over the same period. The number of households receiving food stamps has fallen from 918,966 in January 1998 to 654,138 in September 2001.

Q. Has this affected the enrollment of customers in the telephone Lifeline program?

A. I believe that the decline in families receiving public assistance and food stamps has been a major factor in reducing the number of recipients of telephone Lifeline in New York.

Q. Are the incomes of most of the families that no longer receive food stamps and public assistance in excess of the income guidelines for the existing eight Telephone Lifeline assistance programs?

A. No, the studies that have been completed on those that have left public assistance in New York report that the vast majority continue to have incomes below the federal poverty guidelines. A study by the Rockefeller Institute of Government used administrative data to track families who left welfare in the first quarter of 1997. This study found that only 40% of these families had an adult employed in at least one day in each quarter in the year after they left welfare and that outside New York City, the median annual earnings of families with an adult employed in all four quarters were only $12,611 ($1051 per month), far below the $16,660 poverty line for a family of four in 1998. Even in New York City, the median earnings were only a meager $17,431 ($1453 per month). Researchers working with the New York City Human Resources Administration conducted phone interviews in May 1998 with families who left public assistance in November 1997. These researchers were only able to find 211 of 596 randomly selected families and were able to complete interviews with only 126 of these families. Of these families, only

25 percent had incomes above the federal poverty guidelines and less than a third said they were better off financially after leaving public assistance.

Q. Are less New Yorkers meeting the income thresholds today than was true in earlier years?

A. Yes. While most of the benefits of the economic expansion of the 1990s have been skewed toward the upper end of the income distribution, there has been some indication of rising living standards over this period. The number of families in New York with incomes below the official poverty line has decreased from 650,000 in 1998 to 504,000 in 2000, the most recent year for which data from the U.S. Bureau of the Census is available. Despite this decline, one in five families in New York, (980,365) had incomes below 175% of the federal poverty guidelines in 2000. Under the HEAP program, assistance is available (and therefore Telephone Lifeline assistance is available) to families (with seven or fewer members) with incomes less than approximately 180% of the federal poverty guidelines.

Q. How could the Telephone Lifeline Program's design be supplemented to enhance its ability to reach the existing low-income population?

A. There most efficient method of enhancing the Telephone Lifeline Program's ability to reach its target population is by adding to the list of programs, which will qualify a customer for Telephone Lifeline benefits.

Q. Are there other income tested assistance programs for which these low-income New Yorkers are qualified which could be used as a supplemental test for eligibility for participation in the Telephone Lifeline Program?

A. Yes. The three best examples of such programs are: the National School Lunch Program, the State Child Health Plus Program, and the State Earned Income Tax Credit Program. Each of these programs makes an excellent addition to the programs that create Telephone Lifeline Eligibility because each reaches the low-income population through means different from the existing Lifeline qualifying programs. In other words, while the same social service agencies often administer Family Assistance and Food Stamps, they are unlikely to be responsible for the School Lunch program. Similarly, households that qualify for the State Earned Income Tax Credit receive this benefit by filing for it on a State tax return, and not through application or other mechanism of interaction with the local social services infrastructure. Also in the case of each of these programs, there is a high likelihood that participation in these programs will not be significantly affected by the developing changes in the assistance programs occasioned by welfare reform. Accordingly, each program is likely to continue accurately to identify low-income households independently of changes that may be occurring in the other programs now used to establish Telephone Lifeline eligibility.

Q. Aren't most of the families who would be eligible for these supplemental programs already income eligible for the programs that are currently used to certify Telephone Lifeline eligibility?

A. While the income guidelines for these programs often overlap, each program has a series of other eligibility requirements so a household may be eligible for one program but not another. For example, residents living in subsidized housing are not eligible for the HEAP program even if their incomes fall below the guidelines (unless they pay heating costs separately from their heat), but may have been Food Stamp eligible and, before welfare reform, would have received Telephone Lifeline benefits. When their participation in the Food Stamp Program ended, they may have lost the Lifeline benefit. This family, however, is likely to have children participating in Child Health Plus or the Free or Reduced Price National School Lunch Program or to have claimed a State Earned Income Tax Credit, and could retain their Lifeline participation, if these were added to the list of programs used to establish Lifeline eligibility.

Q. What is the National School Lunch program and what are its income eligibility criteria?

A. The National School Lunch program is the federal program by which school age children from low-income households qualify to receive free or reduced price lunch (and in some cases, breakfast) at school. Eligibility for the program is based on family income and the income thresholds are established by federal statute (42 U.S.C. § 1758 (b)(1)(A)), for free lunches, as "130 percent of the applicable family size income levels contained in the nonfarm income poverty guidelines prescribed by the Office of Management and Budget … " and, for reduced price lunch, as "185 percent of the applicable family size income levels contained in the nonfarm income poverty guidelines prescribed by the Office of Management and Budget … ."

Q. Has the National School Lunch Program been used in other jurisdictions as a program to qualify households for Telephone Lifeline assistance?

A. Yes, the FCC recently addressed its concern that telephone subscription was low on Indian and tribal land by expanding the list of programs which could qualify customers for Telephone Lifeline assistance. Among the added programs was the National School Lunch program. The FCC recognized the National School Lunch program to be one of four "more suitable income proxies" for the low-income population that was the subject of its concern. Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, Federal Communications Commission, CC

Docket No. 96-45, FCC 00-208 (adopted June 8, 2000, released June 30, 2000) at ¶ 69.

Q. What is the State Earned Income Tax Credit (EITC) program and what are its income eligibility criteria?

A. The State EITC is administered through the State income tax program. It is modeled on the federal EITC and is targeted on low-income households and, in particular, households of the "working poor" which may not qualify for other assistance programs but which are likely to have significant needs. Under the State EITC, the taxpayer identifies himself or herself on the State tax return as a recipient of the federal EITC and claims the additional State tax credit on the State return. Because of its design, the State EITC adds no additional eligibility criteria to those established for the federal EITC. Under the federal EITC, eligibility is provided for households with two or more children and incomes below $32,121, for households with one child and incomes below $28, 250, and for households with no children and incomes below $10,700.

Q. What is the State Child Health Plus program and what are its income eligibility criteria?

A. The State Child Health Plus program is a health insurance program for children in low-income households that do not qualify for Medicaid. Eligibility is open to all, without regard to income, but family contributions to the premium costs depend upon family income. Children from families with incomes below the Federal Poverty Line (FPL) are generally enrolled in Medicaid rather than Child Health Plus. Children from families with incomes above 192% of the FPL may enroll in Child Health Plus but the family is required to pay the entire cost of the premium. It is therefore reasonable to assume that most Child Health Plus families have incomes between 100% and 200% of the FPL.

Q. Does this conclude your testimony?

A. Yes.

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Inter-American Development Bank — *Washington, DC*

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Families U.S.A. (formerly the Villers Foundation) — *Washington, DC*

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Antioch School of Law — *Washington, DC*

PROJECT DIRECTOR — 1977-1980
National Association of Farmworker Organizations — *Washington, DC*

PUBLICATIONS

Poverty and Single Parent Families: A Study of Minimal Subsistence Household Budgets (New York: Garland Publishing) 1998.

Basic Needs Budgets Revisited: Does the Consumer Price Index Overestimate the Changes in the Cost of Living for Low-Income Families? *Journal of Feminist Economics*, Winter 1998.

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Committee on the Future Role of Regulated Utilities; New York State Public Service Commission, Case 00-M-0504: *Energy Competition: Next Steps*

Self-Sufficiency Standard for New York State Steering Committee

Economic Policy Institute Family Budgets Advisory Committee

Economic Policy Institute Living Wage Campaigns Research Advisory Group

New York State Energy Research and Development Authority System Benefits Charge Advisory Group

New York State Energy Research and Development Authority Residential Energy Affordability Program Low-Income Program Review Group

TESTIMONY AND COMMENTS

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Comments before the New York Public Service Commission on the Staff Report on Nuclear Generation In the Matter of Competitive Opportunities Regarding Electric Service Case 94-E-0952, October 14, 1997.

Testimony before the State of New York Public Service Commission Petition of New York State Electric & Gas Corporation for Approval of a Second-stage Electric and Gas Rate Filing as agreed to in Paragraph 11-f of the Settlement Agreement, which was approved by the Commission's Order issued on August 31, 1993, filed in Cases 92-E-1084, 92-E-1085 and 92-G-1086 Case 94-M-0349, June 1995 and March 1996.

Testimony before the State of New York Public Service Commission In the Matter of Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of the National Fuel Gas Corporation Case 94-G-0885, March 1995.

Testimony on behalf of United Tenants of Albany before the State of New York Public Service Commission In the Matter of Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of `the Niagara Mohawk Power Corporation Case 94-E-0098 et al., August 31, 1994.

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Comments on the Staff Report and Oral On-the-Record Presentation before the State of New York Public Service Commission In the Matter of Proceeding on Motion of the Commission to Address Issues Associated with the Restructuring of the Emerging Competitive Natural Gas Market Case 93-G-0932, May 1994.

Testimony before the State of New York Public Service Commission In the Matter of Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of the Brooklyn Union Gas Company for Gas Service Case 93-G-0941, February 1994.

EXHIBIT F

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3454 N 51st Ave
Phoenix AZ 85031
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ROSTER OF CAA AGENCIES
FOR FISCAL YEAR 2005-06
FUNDED BY THE COMMUNITY SERVICES BLOCK GRANT

Arivaca Coordinating Council Human Resources Group

P.O. Box 93
Physical Address: 17252 W. 5th Street
Arivaca, AZ 85601

President: James Johnson
Contact: Donna Sala
Phone: 398-2771
Fax: 398-9788

Provides congregate/home delivered meals and food boxes to low-income residents in the Arivaca area.

The Brewster Center Domestic Violence Services

2425 N. Haskell Drive, Building #4
Tucson, AZ 85716

Executive Director: Michele Schubert
Contact: Michele Schubert
Phone: 320-7556
Fax: 323-0122

Provides shelter services, support services, and education through Casa Amparo to women and children who are victims of domestic violence.

Catholic Community Services of Southern Arizona

5009 E. 29th Street
Tucson, AZ 85711

Executive Director: Marguerite Harmon
Contact: Linda Hutchings
Phone: 624-1562
Fax: 519-1303

Maintain and operate a food bank in the Robles Junction/Three Points area. Services will be provided one day a week (Tuesdays 3-6 p.m.).

Community Home Repair Projects of Arizona (CHRPA)

P.O. Box 26215
Tucson, AZ 85726

Executive Director: Scott Coverdale
Contact: Scott Coverdale
Phone: 745-2055
Fax: 745-2359

Provides minor home repair services to low-income residents of Pima County.

Community Food Bank

3003 S. Country Club Road
Tucson, AZ 85726-2767

Executive Director: Barbara Joy Tucker
Contact: Varga Garland
Phone: 622-0525
Fax: 624-6349

Provide nutrition education and assisting low-income residents of Pima County in establishing a garden at their homes to increase their food security.

El Rio Santa Cruz Neighborhood Health Center

839 W. Congress Street
Tucson, Arizona 85745

Executive Director: Kathy Byrne
Contact: Linda Lopez
Phone: 670-3918
Fax: 670-3814

Provides prescription medication and medical supplies to patients who are low-income and registered with El Rio Health Center.

Family Counseling Agency

209 S. Tucson Blvd., Suite 1
Tucson, AZ 85716

Executive Director:	Frank Williams
Contact:	Lana Baldwin
Phone:	327-4583
Fax:	795-7604

Provide shelter services and other support services to pregnant youth who are homeless or at risk of becoming homeless in the Marana, Picture Rocks, Avra Valley and other areas in the northwest side of town.

Greater Littletown Human Resources Group

6465 S. Craycroft (Location Site)
6816 S. Van Buren (Mail)
Tucson, AZ 85706

President:	W.L. (Roy) Smalley
Contact:	Phyllis McKenzie or Dolly Hurley
Phone:	574-2263
Fax:	574-2273

Provides emergency food boxes and limited financial emergency assistance to low-income residents of Pima County.

Pima County Cooperative Extension

4210 N. Campbell Avenue
Tucson, AZ 85719

Executive Director:	Cynthia Flynn
Contract:	Linda Block
Phone:	626-5161
Fax:	626-5849

Provides information (Resource Manual) to grandparents raising grandchildren, support groups, and support services to help maintain family stability.

St. Elizabeth of Hungary Clinic

140 W. Speedway, Suite 100
Tucson, AZ 85705-7698

Executive Director: Nancy Metzger
Contact: Maria Elena Acuna
Phone: 628-7871
Fax: 205-8461

Provides medications and/or medical supplies to low-income residents of Pima County.

San Ignacio Yaqui Council

785 W. Sahuaro
Tucson, AZ 85705

President: Arcadio Gastellum
Contact: Emilio Caiz
Phone: 884-8527
Fax: 792-1650

Provides emergency assistance, including but not limited to, rent/mortgage assistance, clothing, food vouchers, bus passes, non-prescription medications to low-income residents of Pima County.

Wingspan

425 E. 7th Street
Tucson, AZ 85705-8513

Executive Director: Kent Burbank
Contact: J.C. Olsen
Phone: 624-1779
Fax: 624-0364

Provides a drop-in center, weekly support groups, leadership and skill-building for LGBT youth.

Youth on Their Own

1443 W. Prince Road
Tucson, AZ 85705

Executive Director:
Contact:
Phone:
Fax:

Provides monthly stipends to homeless youth ages 8-22 who are attending school. Other services include food, a clothing bank, tutoring, counseling, medical/dental care, personal hygiene items, and scholarship opportunities.

Emergency Services Network
Roster of Agencies
(Revised August 8, 2005)

Chicanos Por La Causa
Attn: Cristine Abeyta
200 N. Stone
Tucson, AZ 85701
(520) 882-0018
Fax: 882-4191

Project PPEP
Attn: Danny Dyas
806 E. 46th Street
Tucson, AZ 85713
(520) 622-3553
Fax: 622-1480

Interfaith Community Services
Attn: Terri Smith/Bonnie Kampa
2820 W. Ina Road
Tucson, AZ 85741
(520) 297-6049
Fax: 797-3029

Tucson Urban League
Attn: Shani Stewart
2305 S. Park Avenue
Tucson, AZ 85713
(520) 791-9522
Fax: 623-9364

Traveler's Aid
Attn: Paula Block
40 W. Veterans Blvd.
Tucson, AZ 85713
(520) 622-8900
Fax: 622-2964

Tucson Indian Center
Attn: Jacob Bernal
97 E. Congress
Tucson, AZ 85701
(520) 884-7131
Fax: 884-0240

Salvation Army
Attn: John Barnes
3525 E. 2nd Street, #1
Tucson, AZ 85716
(520) 323-6080
Fax: 546-5968

Az. Hsg. & Prev. Svs.
P.O. Box 13122
Tucson, AZ 85711
(520) 498-4613 (VP)
Fax: 795-1727

Ajo Community Svs.
Attn: Mary Garcia
120 Estrella
Ajo, AZ 85321
1-520-387-5611
Fax: 1-520-387-5596

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PIMA COUNTY LIHEAP AFFILIATES

Greater Littletown HRG
Attn: Phyllis McKenzie
~~6816 S. Van Buren~~ P.O. Box 22648
Tucson, AZ ~~85706~~ 85734
(520) 574-2263
Fax: 574-2273

Arivaca Coord. Council HRG
Attn: Donna Sala
P.O. Box 93
Arivaca, AZ 85601
(520) 398-2771
Fax: 398-9788

San Ignacio Yaqui Council
Attn: Jackie Lopez
785 W. Sahuaro
Tucson, AZ 85705
(520) 884-8527
Fax: 792-1650

Catalina Area
14380 N. Oracle
Tucson, AZ 85737
(520) 825-8288 or 825-9611

Picture Rocks Community Ctr.
Attn: Billie Donahue
5615 N. Sanders Road
Tucson, AZ 85743
(520) 682-7166
Fax: 682-7026

Marana Food Bank
Attn: Dolores Escobedo
11734 W. Grier Road
Marana, AZ 85653
(520) 682-3001
Fax: 682-4136

Az. Hsg. & Prevention Svs.
P.O. Box 13122
Tucson, AZ 85711
(520) 498-4613 (VP)
Fax: 795-1727

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