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April 21, 2015

Ms. Natella Dietrich, Director Operations Division  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street, Suite 500  
Jefferson City, MO 65102

Re: Independent Accountants' Report over the Lifeline Biennial Audit Plan for  
Windstream

Please find the attached independent accountant's report on applying agreed-upon procedures over the lifeline biennial audit plan for the year ended December 31, 2013 for Windstream Communications, Inc.

Please note the report is being provided to you as required by the FCC Public Notice (DA14-450 released April 2, 2014) and that no action is needed on your part.

Sincerely,

A handwritten signature in cursive script that reads "Tim Loken".

Tim Loken  
Director of Regulatory Reporting

**WINDSTREAM COMMUNICATIONS, INC.**

*Independent Accountants' Report on Applying  
Agreed-Upon Procedures over the Lifeline  
Biennial Audit Plan for the year ended December 31, 2013*

**WINDSTREAM COMMUNICATIONS, INC.**

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## **INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED-UPON PROCEDURES**

**To the Management of Windstream Communications, Inc.; the Universal Service Administrative Company (USAC); and the Federal Communications Commission (FCC or Commission):**

We have performed the procedures enumerated in Attachment I to this report, which were agreed to by the FCC's Wireline Competition Bureau ("Bureau") and Office of Managing Director ("OMD") in the Lifeline Biennial Audit Plan or as otherwise directed by the Bureau, solely to assist you in evaluating Windstream Communications, Inc.'s ("Windstream" or "Carrier") compliance with certain regulations and orders governing the Low Income Support Mechanism (also known as the Lifeline Program) of the Universal Service Fund, set forth in 47 C.F.R. Part 54, as well as other program requirements, including any state-mandated Lifeline requirements (collectively, the Rules) detailed in the Lifeline Biennial Audit Plan for the calendar year ended December 31, 2013. Windstream's management is responsible for compliance with the Rules. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the Generally Accepted Government Auditing Standards ("GAGAS") issued by the Government Accountability Office (2011 Revision). The sufficiency of these procedures is solely the responsibility of the Bureau and OMD. Consequently, we make no representation regarding the sufficiency of the procedures described in Attachment I to this report either for the purpose for which this report has been requested or for any other purpose.

Specific procedures and related results are enumerated in Attachment I to this report. In compliance with the Lifeline Biennial Audit Plan, this report does not contain any personally identifiable information or individually identifiable customer proprietary network information.

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on Windstream's compliance with the Rules. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the management of Windstream, USAC, and the FCC, and is not intended to be and should not be used by anyone other than these specified parties. This report becomes a matter of the public record upon filing of the final report with the FCC. The final report is not confidential.

*JPMS Cox, PLLC*

March 30, 2015

## ATTACHMENT I:

Attachment 1 enumerates the agreed-upon procedures for Windstream, the associated results, and any management responses obtained in relation to the exceptions identified.

**Objective 1: Carrier Obligation to Offer Lifeline. To determine if the ETC has procedures in place to make Lifeline services available to qualifying low-income consumers with mandated disclosures regarding requirements to participate in the Lifeline program, and procedures for de-enrolling subscribers when they are no longer eligible to receive Lifeline services.**

### *Procedure 1*

JPMS Cox, PLLC inquired of management on October 27, 2014, and obtained the Carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for offering Lifeline service to qualifying low-income consumers.

JPMS Cox, PLLC examined the Carrier's policies and procedures, and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Rules set forth in Appendix F of the Lifeline Biennial Audit Plan.

JPMS Cox, PLLC noted no discrepancies between the Carrier's policies and procedures, management's responses to the inquiries, and the Commission's Rules.

No exceptions noted.

### *Procedure 2*

JPMS Cox, PLLC inspected a sample of 10 of the Carrier's marketing materials describing the Lifeline service (i.e., print, audio, video and web materials used to describe or enroll in the Lifeline service offering, including standard scripts used when enrolling new subscribers, application and certification forms), as provided in response to Items 4, 6, and 7 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan.

### **Finding #2013-1:**

JPMS Cox, PLLC noted the inspected marketing materials contained the required information, with the exception of the following:

- All of the inspected marketing materials (including the website and nine print advertisements) omitted the disclosure that the service is non-transferable.

There is no monetary effect associated with this finding.

### *Beneficiary Response:*

This was identified in a USAC audit during the same period and has been corrected going forward.

***Procedure 3***

JPMS Cox, PLLC randomly selected 10 recorded calls servicing the Carrier's Lifeline subscribers, as provided in response to Item 8 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan.

JPMS Cox, PLLC reviewed the 10 recorded calls, noting that the telephone number utilized for these calls involved the use of interactive voice response system.

JPMS Cox, PLLC reviewed the 10 recorded calls, noting a live customer care operator was available.

JPMS Cox, PLLC reviewed the 10 recorded calls, noting the time spent using the customer care telephone service, which ranged from 1:21 to 8:39. For two of the recorded calls the recording appeared to stop before the call was completed. JPMS Cox, PLLC inquired of Windstream, who also noticed that the recording stopped prior to the end of the call. Although two of the recordings ended early, we noted no exceptions based on the reviewed criteria of the calls provided.

JPMS Cox, PLLC reviewed the 10 recorded calls, noting whether the customer care telephone number could be used by subscribers to notify the Carrier of the subscriber's intent to cancel service or give notification that the subscriber is no longer eligible to receive service. JPMS Cox, PLLC was unable to verify this based on the calls reviewed. No evidence was noted that the number could not be used by subscribers for these purposes, but none of the calls reviewed were for these purposes.

JPMS Cox, PLLC reviewed the 10 recorded calls, noting whether any statements by a Carrier representative in the recorded calls misled the subscriber or conflicted with the Rules per 47 C.F.R. Section 54, Subpart E. JPMS Cox, PLLC noted no such statements. The training materials provided by USAC during the training conducted from October 6 to October 9, 2014 for the Lifeline Biennial Audit Plan stated the calls should be reviewed for these statements; however, JPMS Cox, PLLC noted this step was not included in the Lifeline Biennial Audit Plan. Therefore, JPMS Cox, PLLC reported this to USAC. (**USAC Reporting Item #2013-1**)

No exceptions noted.

***Procedure 4a***

JPMS Cox, PLLC obtained the Carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for de-enrollment where the Carrier has information indicating that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer under 47 C.F.R. § 54.409.

JPMS Cox, PLLC inspected the Carrier's policies and procedures, noting they detailed the process for communications between the subscriber and Carrier regarding de-enrollment, including, but not limited to: (1) notifying subscribers of impending termination of service; (2) allowing subscriber to demonstrate continued eligibility; and (3) termination of service for failure to demonstrate eligibility.

JPMS Cox, PLLC noted no areas that are not in compliance with section 54.405(e)(1) of the Commission's Rules.

No exceptions noted.

***Procedure 4b***

JPMS Cox, PLLC requested the Carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for de-enrolling subscribers that are receiving Lifeline service from another carrier or where more than one member of a subscriber's household is receiving Lifeline service (duplicative support).

JPMS Cox, PLLC noted Windstream's policies required appropriate de-enrollment if duplicate support from accounts with Windstream was noted within a household. The identification of duplicate support from another carrier was not available during 2013 as USAC did not begin giving such notifications to carriers until the National Lifeline Accountability Database ("NLAD") went live, which was not until 2014. Therefore, since JPMS Cox, PLLC would not expect these policies and procedures to be in place during 2013, no exception noted related to verifying the policy and procedures for de-enroll subscribers within five business days of receiving notification from USAC program management that a subscriber or a subscriber's household is receiving duplicative Lifeline support, as required by section 54.405(e)(2) of the Commission's Rules.

No exceptions noted.

***Procedure 4c***

JPMS Cox, PLLC noted that this procedure, related to de-enrolling subscribers for non-usage, was not applicable to Windstream because Windstream assesses and collects a monthly fee from Lifeline Program subscribers, consistent with the regulations in 47 C.F.R. § 54.405.

No exceptions noted.

***Procedure 4d***

JPMS Cox, PLLC obtained the Carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for de-enrolling a Lifeline subscriber that does not respond to the Carrier's attempts to obtain recertification, as part of the annual eligibility recertification process.

JPMS Cox, PLLC randomly selected 30 subscribers who responded to direct contact, as provided in response to Items 9.i and Items 9.j of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan.

JPMS Cox, PLLC obtained copies of the notice of impending de-enrollment letters and all other communications sent to the 30 subscribers involving recertification. JPMS Cox, PLLC noted that Windstream retains templates of the recertification requests, not the recertification requests sent to each individual subscriber.

JPMS Cox, PLLC inspected the templates of the recertification requests, noting that they explained that the subscriber has 30 days following the date of the notice of impending de-enrollment letter to demonstrate continued eligibility or the Carrier will terminate the subscriber's Lifeline service.

JPMS Cox, PLLC reviewed the templates of the recertification requests and the Carrier's responses to the background questionnaire and verified through observation that the templates of the recertification requests appeared to be stand-alone documents. There was no indication that these templates would have been sent with the subscriber's bill.

JPMS Cox, PLLC reviewed the templates of the recertification requests, noting whether the communications were in clear, easily understood language. JPMS Cox, PLLC noted no exceptions. The training materials provided by USAC during the training conducted from October 6 to October 9, 2014 for the Lifeline Biennial Audit Plan stated the templates should be reviewed to ensure communications were in a clear, easily understood language; however, JPMS Cox, PLLC noted this step was not included in the Lifeline Biennial Audit Plan. Therefore, JPMS Cox, PLLC reported this to USAC. (USAC Reporting Item #2013-2)

JPMS Cox, PLLC attached the three templates of the recertification requests used in this procedure. See Attachment II.

No exceptions noted.

**Objective 2: Consumer Qualification for Lifeline. To determine if the ETC has procedures in place to limit Lifeline service to qualifying low-income consumers and ensure that Lifeline service is limited to a single subscription per household.**

***Procedure 1***

JPMS Cox, PLLC inquired of management on October 27, 2014, and obtained the Carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for limiting Lifeline support to a single subscription per household.

JPMS Cox, PLLC examined the Carrier's policies and procedures, and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Rules set forth in 54.409(c) of Appendix F of the Lifeline Biennial Audit Plan.

JPMS Cox, PLLC noted no discrepancies between the Carrier's policies and procedures, management's responses to the inquiries, and the Commission's Rules.

No exceptions noted.

***Procedure 2***

JPMS Cox, PLLC reviewed the procedures the Carrier has in place to ensure it has accurately completed the FCC Form 497.

JPMS Cox, PLLC noted the procedures included the required information, with the exception of the process for completing the Tribal Link Up portions of the FCC Form 497, which was not applicable to Windstream for the states selected.

No exceptions noted.

***Procedure 3***

JPMS Cox, PLLC obtained the Subscriber List for the states selected, in accordance with the procedures of the Lifeline Biennial Audit Plan, of Florida, Minnesota, and Kentucky during our randomly selected month of July 2013 ("Subscriber List") in response to Item 1 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan, and the Carrier's FCC Forms 497 for each study area in the selected states (Florida, Minnesota, and Kentucky) for the selected month (July 2013).

JPMS Cox, PLLC examined the number of subscribers claimed on the Forms 497.

JPMS Cox, PLLC compared the number of subscribers reported on the Forms 497 to the number of subscribers contained on the Subscriber List for each study area.

JPMS Cox, PLLC noted no discrepancies in the number of subscribers.

No exceptions noted.

***Procedure 4***

JPMS Cox, PLLC used computer-assisted audit techniques to examine the Subscriber List and identify any duplicate addresses with different subscribers.

JPMS Cox, PLLC created a list reflecting these results.

No exceptions noted.

***Procedure 5***

JPMS Cox, PLLC randomly selected 30 subscribers from the list created in Procedure 4 above and requested copies from the Carrier of the one-per-household certification form for each of the selected subscribers. JPMS Cox, PLLC noted that Windstream relies on the subscriber's recertification form in lieu of a one-per-household worksheet.

**Finding #2013-2:**

JPMS Cox, PLLC noted that Windstream was unable to provide the recertification form for 7 of the 30 subscribers selected; therefore, we were unable to complete the associated procedures for these 7 subscribers.

If these 7 subscribers improperly received Lifeline credits from January 1, 2013 to December 31, 2013, the total monetary effect associated with this finding would be \$777.

***Beneficiary Response:***

The one per household form was not established until after the implementation of the NLAD database. Windstream started utilizing this form in 2014 and is now in compliance with this rule.

***Procedure 5 (continued)***

JPMS Cox, PLLC verified that the selected subscribers certified to only receiving one Lifeline-supported service in his/her household on the recertification form.

JPMS Cox, PLLC examined the 23 recertification forms provided, noting whether they contained 2 of the 4 specific elements required by the Lifeline Reform Order, paragraph 78. The other 2 items, related to a space for the applicant to certify that s/he shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income and the penalty for a subscriber's failure to make the required one-per-household certification, were not considered applicable for the recertification forms tested. JPMS Cox, PLLC would expect these items to be included on the one-per-household certification form, which would only be required to be completed if a subscriber had checked the box that they live in a multi-household. None of the selected subscribers checked this box; therefore, none of them completed a one-per-household certification, as expected.

JPMS Cox, PLLC performed the testing described above based on the training materials provided by USAC during the training conducted from October 6 to October 9, 2014; however, the Lifeline Biennial Audit Plan only required the auditor to note the number of missing or incomplete certifications and not the testing of the specified element required by Lifeline Reform Order, paragraph 78. Therefore, JPMS Cox, PLLC reported this to USAC. (**USAC Reporting Item #2013-3**)

No exceptions noted.

**Objective 3: Subscriber Eligibility Determination and Certification. To determine if the ETC implemented policies and procedures for ensuring that their Lifeline subscribers are eligible to receive Lifeline services.**

***Procedure 1***

JPMS Cox, PLLC inquired of management on October 27, 2014, and obtained the Carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for ensuring that its Lifeline subscribers are eligible to receive Lifeline services.

JPMS Cox, PLLC examined the Carrier's policies and procedures, and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Rules set forth in section 54.410 of Appendix F of the Lifeline Biennial Audit Plan.

JPMS Cox, PLLC noted no discrepancies between the Carrier's policies and procedures, management's responses to the inquiries, and the Commission's Rules.

**Finding #2013-3:**

JPMS Cox, PLLC inspected the Carrier's policies, noting it included a policy that the Carrier does not retain copies of subscribers' proof of income- or program-based eligibility. However, during JPMS Cox, PLLC's testing of subscribers, JPMS Cox, PLLC noted one subscriber whose application included proof of participation in a qualifying program.

There is no monetary effect associated with this finding.

***Beneficiary Response:***

There was an error in what was retained for the given customer. Policies are now in place clarifying the material that should be retained vs. destroyed.

***Procedure 1 (continued)***

JPMS Cox, PLLC inspected the Carrier's policies, noting it included a policy that the Carrier must fully verify the eligibility of each low-income consumer prior to providing Lifeline service to that consumer. The policies did not include a policy that the Carrier or its agents may not provide the consumer with an activated device intended to enable access to Lifeline service until that consumer's eligibility is fully verified and all other necessary enrollment steps have been completed since this is not applicable to Windstream due to Windstream not providing activating devices. Windstream provides landline services only under this program.

JPMS Cox, PLLC summarized below the process for ensuring the Carrier and its representatives review, but do not retain, copies of subscribers' proof of income- or program-based eligibility and the process for ensuring the Carrier and its representatives fully verify the eligibility of each subscriber prior to providing Lifeline service to that subscriber. Since it was not applicable to Windstream, we did not summarize the process for ensuring the Carrier and its representatives do not provide a subscriber with an activated Lifeline Program-supported device until the subscriber has completed all enrollment steps and the Carrier and its representatives have fully verified the eligibility of the subscriber. The training materials provided by USAC during the training conducted from October 6 to October 9, 2014 for the Lifeline Biennial Audit Plan stated the process must be summarized as described above; however, JPMS Cox, PLLC noted that this step in the Lifeline Biennial Audit Plan only required us to note in the report if a policy is not included related to these items. Therefore, JPMS Cox, PLLC reported this to USAC. (USAC Reporting Item #2013-4)

The Windstream Support agent reviews the customer's proof of eligibility and compares it to the Lifeline form completed by the customer. After the proof has been verified, the agent makes a note on the bottom of the customer's Lifeline form with the proof received. The proof is then destroyed. The customer then begins receiving Lifeline credits.

No exceptions noted.

### ***Procedure 2***

JPMS Cox, PLLC inquired of management on October 27, 2014, and obtained the Carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for training employees and agents for ensuring that the Carrier's Lifeline subscribers are eligible to receive Lifeline services, including any policies regarding how the company ensures employees and agents have completed the training.

JPMS Cox, PLLC summarized below the training requirements and Carrier policies for ensuring employees and agents are trained on the rules for ensuring subscribers are eligible to receive Lifeline services and have completed all forms necessary to receive service. JPMS Cox also included in the summary information provided regarding the timing, frequency and evidence of completion of the initial and any subsequent Lifeline subscriber eligibility and certification trainings required of the Carrier's employees. JPMS Cox, PLLC did not summarize the process for limiting access to the NLAD to select individuals or the process for training employees/agents on the use and interaction with NLAD because NLAD was not in use during 2013. However, management represented that NLAD access is properly restricted now that it is in use during 2014.

See summary at ***Procedure 1*** above related to the process for ensuring subscribers are eligible to receive Lifeline service and the process for ensuring subscribers complete all forms necessary to receive Lifeline service.

Windstream offers training on the Lifeline procedures documented on an internal website. There was a training session held when all the new Lifeline regulations were issued and when NLAD was created. In these cases, all support services staff was retrained. A training agenda was kept to document this training, and a record was kept of the attendees. The agents also participate in

maintenance training, which consists of ongoing huddles that pertain to updates and/or changes with the Lifeline program. Records are not maintained for the maintenance training, which is ongoing.

No exceptions noted.

### ***Procedure 3***

JPMS Cox, PLLC randomly selected 100 subscribers from the Subscriber List and performed the tests described in this procedure for each of the first 50 subscriber's certification and recertification forms, with the exception of the following:

- Procedure 3.a.viii.3, related to eligibility based on living on Tribal lands, was not applicable to Windstream for the states selected.
- Procedure 3.a.xii, related to subscribers receiving Tribal Lifeline support, was not applicable to Windstream for the states selected.

JPMS Cox, PLLC determined whether the certification and recertification forms tested contained all the elements required per 47 C.F.R. Section 54.410. JPMS Cox, PLLC noted the following was a required element per review of this section; however, this step was not included in the Lifeline Biennial Audit Plan. Therefore, JPMS Cox, PLLC reported this to USAC. (**USAC Reporting Item #2013-5**)

- If the subscriber provided a temporary residential address to the Carrier, he or she will be required to verify his or her temporary residential address every 90 days.

### **Finding #2013-4:**

JPMS Cox, PLLC noted Lifeline start dates in 2014 for the 100 selected subscribers despite the fact that the Subscriber Listings provided were for July 2013 claims. JPMS Cox, PLLC also noted there were no Lifeline start dates prior to 2013 for the first 50 selections, but the initial certification forms provided by Windstream were from time periods dating back to 2002. JPMS Cox, PLLC inquired of Windstream, who represented that Windstream's billing system will update the customer's start date if they move; therefore, the Lifeline start dates used in our testing may not be accurate in representing the original date the customer started participating in the Lifeline program. Windstream represented they were not able to provide additional information to remove these subscribers who actually enrolled in the program prior to June 1, 2012 from the population; therefore, JPMS Cox, PLLC kept these selections, but did not test the original certifications forms against the criteria in the Lifeline Biennial Audit Plan, as the current Commission's Rules were not in place at the time of the initial certification. Thirty-four of our first 50 selections and 30 of our second 50 selections were not tested per the above reason. Recertifications for these selections, however, were subject to testing in accordance with the Lifeline Biennial Audit Plan as they are done annually.

This finding does not address whether the selections were eligible or not eligible for Lifeline credits; therefore, no monetary effect is associated with this finding.

*Beneficiary Response:*

Due to billing system limitations, Windstream is not able to differentiate a change in a Lifeline account from the establishment of a Lifeline account in mass. However, we are able to look into individual accounts and determine when service was established. A request has been submitted to the information technology department at Windstream to add this feature.

**Finding #2013-5:**

Of the 16 selections available for testing of initial certifications of the initial 50 sample, as described in Finding #2013-3 above, JPMS Cox, PLLC noted that Windstream was unable to provide the initial certification forms for 5 subscribers selected for testing; therefore, we were unable to complete the associated procedures for these 5 subscribers.

If these 5 subscribers improperly received Lifeline credits from the Lifeline start date of June 1, 2012 to December 31, 2013, the total monetary effect associated with this finding would be \$878.75.

*Beneficiary Response:*

Windstream was not able to locate a number of certifications as they could not be found in the multitude of certifications stored. Windstream implemented an enhancement in the certification retention process in February 2015 to be able to pull up a certification based on the customer name and account number. This process enhancement should mitigate this error in the future.

**Finding #2013-6:**

JPMS Cox, PLLC noted that Windstream was unable to provide the recertification forms for 3 of the first 50 subscribers selected for testing; therefore, we were unable to complete the associated procedures for these 3 subscribers.

If these 3 subscribers improperly received Lifeline credits from January 1, 2013 to December 31, 2013, the total monetary effect associated with this finding would be \$333.

*Beneficiary Response:*

Windstream was not able to locate a number of recertification forms as they could not be found in the multitude of certifications stored. Windstream implemented an enhancement in the recertification retention process in February 2015 to be able to pull up a recertification form based on the customer name and account number. This process enhancement should mitigate this error in the future.

**Finding #2013-7:**

JPMS Cox, PLLC noted the exceptions detailed below in the testing procedures of the initial certification forms of the initial 50 subscriber sample. The sample subject to testing was 11 subscribers after excluding those with original certification forms prior to June 1, 2012 (as detailed in Finding #2013-3) and excluding those for which original certification forms were not provided as described in Finding #2013-4.

See below for the number of errors related to each procedure.

Section of Procedure 3 in the Lifeline Biennial Audit Plan:	Number of Selections Missing the Required Information per the listed Section:
3.a.v	11
3.a.viii.7	11
3.a.viii.8	11
3.b	1*

\*We were unable to test this item due to the reviewer not making a note on the form of the method reviewed when verifying eligibility.

If the 1 subscriber noted in section 3.b was improperly receiving Lifeline credits from January 1, 2013 to December 31, 2013, the total monetary effect associated with this finding would be \$111. The remaining exceptions noted above relate to statements that should be included by carrier on the certification forms and not directly related to qualification; therefore, no monetary effect is associated with these exceptions.

*Beneficiary Response:*

Windstream drafted Lifeline certification and recertification forms, provided them to the FCC for feedback, received suggested changes from the Wireline Competition Bureau legal group on May 16, 2012, subsequently revised the forms based on the suggested changes, and sent the revisions to the FCC for additional feedback. Windstream has made additional changes to the certification forms based on this agreed-upon procedures engagement and will utilize these revised forms going forward.

**Finding #2013-8:**

JPMS Cox, PLLC noted the exceptions detailed below in the testing procedures of the recertification forms for the initial sample of 50 subscribers. The sample subject to testing was 45 subscribers after excluding those for which recertification forms were not provided (Finding #2013-5) and excluding two subscribers whose enrollment date was in 2013 and therefore a recertification was not required in 2013. See below for the number of errors related to each procedure.

Section of Procedure 3 in the Lifeline Biennial Audit Plan:	Number of Selections Missing the Required Information per the listed Section:
3.a.v	45
3.a.viii.7	45
3.a.viii.8	45
3.a.x	1
3.b	10*

\* We were unable to test this item due to the reviewer not making a note on the form of the method reviewed when verifying eligibility.

If these 45 subscribers improperly received Lifeline credits from January 1, 2013 to December 31, 2013, the total monetary effect associated with this finding would be \$4,995.

*Beneficiary Response:*

Windstream drafted Lifeline certification and recertification forms, provided them to the FCC for feedback, received suggested changes from the Wireline Competition Bureau legal group on May 16, 2012, subsequently revised the forms based on the suggested changes, and sent the revisions to the FCC for additional feedback. Windstream has made additional changes to the recertification forms based on this agreed-upon procedures engagement and will utilize these revised forms going forward.

JPMS Cox, PLLC noted after performing the tests described above that the error rate was higher than 5%; therefore, JPMS Cox, PLLC performed the tests described in this procedure for each of the second 50 subscriber's certification and recertification forms, with the exception of the following:

- Procedure 3.a.viii.3, related to eligibility based on living on Tribal lands, was not applicable to Windstream for the states selected.
- Procedure 3.a.xii, related to subscribers receiving Tribal Lifeline support, was not applicable to Windstream for the states selected.

**Finding #2013-9:**

Of the 20 selections available for testing of initial certifications of the second 50 subscriber sample, as described in Finding #2013-3 above, JPMS Cox, PLLC noted that Windstream was unable to provide the initial certification forms for 12 subscribers selected for testing; therefore, we were unable to complete the associated procedures for these 12 subscribers.

If these 12 subscribers improperly received Lifeline credits from the Lifeline start date of June 1, 2012 to December 31, 2013, the total monetary effect associated with this finding would be \$2,109.

*Beneficiary Response:*

Of the 12 subscribers where the initial certification could not be found, eight were from Florida where Windstream receives an Excel spreadsheet from the state agency indicating the customers that should be provided Lifeline discounts, so a certification form would not be available in these instances. Of the remaining certifications, Windstream was not able to locate a number of certification forms as they could not be found in the multitude of certifications stored. Windstream implemented an enhancement in the certification retention process in February 2015 to be able to pull up a certification form based on the customer name and account number. This process enhancement should mitigate this error in the future.

**Finding #2013-10:**

JPMS Cox, PLLC noted that Windstream was unable to provide the recertification forms for 23 of the second 50 subscribers selected for testing; therefore, we were unable to complete the associated procedures for these 23 subscribers.

If these 23 subscribers improperly received Lifeline credits from January 1, 2013 to December 31, 2013, the total monetary effect associated with this finding would be \$2,553.

*Beneficiary Response:*

Of the 23 subscribers where the initial recertification could not be found, 11 were turned off in 2013 since the customer did not provide the recertification form as required and three recertification forms were subsequently found. Of the remaining recertifications, Windstream was not able to locate these certifications as they could not be found in the multitude of recertifications stored. Windstream implemented an enhancement in the recertification retention process in February 2015 to be able to pull up a recertification based on the customer name and account number. This process enhancement should mitigate this error in the future.

**Finding #2013-11:**

JPMS Cox, PLLC noted the exceptions detailed below in the testing procedures of the initial certification forms for the second sample of 50 subscribers. The sample subject to testing was 8 subscribers after excluding those with original certification forms prior to June 1, 2012 (as detailed in Finding #2013-3) and excluding those for which original certification forms were not provided as described in Finding #2013-8. See below for the number of errors related to each procedure.

Section of Procedure 3 in the Lifeline Biennial Audit Plan:	Number of Selections Missing the Required Information per the listed Section:
3.a.i	2
3.a.ii	1
3.a.iii	1
3.a.iv	2
3.a.v	7
3.a.vi	2
3.a.vii.3	2
3.a.vii.4	1
3.a.vii.5	2
3.a.vii.6	2
3.a.vii.7	1
3.a.vii.8	2
3.a.viii.1	1
3.a.viii.2	2
3.a.viii.4	2
3.a.viii.5	2
3.a.viii.6	2
3.a.viii.7	8
3.a.viii.8	8
3.a.ix	2
3.b	1*

\* We were unable to test this item due to the reviewer not making a note on the form of the method reviewed when verifying eligibility.

If these 8 subscribers improperly received Lifeline credits from January 1, 2013 to December 31, 2013, the total monetary effect associated with this finding would be \$888.

*Beneficiary Response:*

Windstream drafted Lifeline certification and recertification forms, provided them to the FCC for feedback, received suggested changes from the Wireline Competition Bureau legal group on May 16, 2012, subsequently revised the forms based on the suggested changes, and sent the revisions to the FCC for additional feedback. Windstream has made additional changes to the certification forms based on this agreed-upon procedures engagement and will utilize these revised forms going forward.

**Finding #2013-12:**

JPMS Cox, PLLC noted the exceptions detailed below in the testing procedures of the recertification forms on the second sample of 50 subscribers. The sample subject to testing was 26 subscribers after excluding those for which recertification forms were not provided (as described in Finding #2013-9) and excluding one subscriber whose enrollment date was in 2013 and therefore a recertification was not required in 2013. See below for the number of errors related to each procedure.

Section of Procedure 3 in the Lifeline Biennial Audit Plan:	Number of Selections Missing the Required Information per the listed Section:
3.a.v	26
N/A (USAC Reporting Item #2013-5)	2
3.a.viii.7	26
3.a.viii.8	26
3.a.x	6
3.b	6*

\*We were unable to test this item due to the reviewer not noting the method reviewed when verifying eligibility.

If these 26 subscribers improperly received Lifeline credits from January 1, 2013 to December 31, 2013, the total monetary effect associated with this finding would be \$2,886.

*Beneficiary Response:*

Windstream drafted Lifeline certification and recertification forms, provided them to the FCC for feedback, received suggested changes from the Wireline Competition Bureau legal group on May 16, 2012, subsequently revised the forms based on the suggested changes, and sent the revisions to the FCC for additional feedback. Windstream has made additional changes to the recertification forms based on this agreed-upon procedures engagement and will utilize these revised forms going forward.

**Objective 4: Annual Certifications and Recordkeeping by Eligible Telecommunications Carriers. To determine if ETCs have made and submitted to the Universal Service Administrative Company the required annual certifications, under penalty of perjury, relating to the Lifeline program by an officer of the company and maintained recordkeeping requirements.**

***Procedure 1***

JPMS Cox, PLLC inquired of management on October 27, 2014, and obtained the Carrier's policies and procedures in response to Item 12 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for ensuring that the Carrier has made and submitted the annual certifications required under sections 54.416 and 54.422 of the Commission's Rules.

JPMS Cox, PLLC examined the Carrier's policies and procedures, and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Rules set forth in sections 54.416 and 54.422 of Appendix F of the Lifeline Biennial Audit Plan.

JPMS Cox, PLLC noted no discrepancies between the Carrier's policies and procedures, management's responses to the inquiries, and the Commission's Rules.

No exceptions noted.

***Procedure 2***

JPMS Cox, PLLC examined the Carrier's FCC Form 555 that was filed the January following the audit period. JPMS Cox, PLLC verified that an officer of the Carrier made all the required certifications, with the exception of the following:

- Procedure 2, related to certification by an officer of the Carrier that s/he understands the Commission's Rules and requirements. (**Finding #2013-13**)
- Procedure 2.c, related to instances where a Carrier confirms consumer eligibility by relying on income or eligibility databases, which was not applicable to Windstream.

There is no monetary effect associated with this finding.

***Beneficiary Response:***

Windstream completed the Form 555 as prescribed by USAC and does not have any control over the wording of the Form. The Form 555 needs to be modified to include a statement that "s/he understands the Commission's Rules and Requirements" in order to satisfy this requirement.

***Procedure 3***

JPMS Cox, PLLC examined the Carrier's organizational chart provided in response to Item 5 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan. JPMS Cox, PLLC verified that the FCC Form 555 was certified by an officer of Windstream per the organizational chart or other publicly available documents.

No exceptions noted.

***Procedure 4***

**Finding #2013-14:**

JPMS Cox, PLLC verified that the subscriber count per the FCC Form 555 agreed with the total subscriber count per the February Form 497, with the exception of the following:

- The subscriber count per the FCC Form 555 for Florida (4,766) did not agree to the total subscriber count per the February Form 497 for study area 210336 (4,771).

As this finding was related to whether reporting was consistent among Form 555 and Form 497, no monetary effect is associated with this finding.

*Beneficiary Response:*

Windstream will revise its process to ensure that the Form 555 total in column “A” includes lines provided to Wireline Resellers (included in column “B”) to ensure the Form 555 ties to the Form 497 going forward.

***Procedure 5***

JPMS Cox, PLLC randomly selected three states (Florida, Minnesota, and Kentucky) to comprise the Recertification Sample.

JPMS Cox, PLLC reviewed the Carrier’s recertification results of the individual subscribers reported on the FCC Form 555 filed the January following the audit period for those three randomly selected states, as provided in Item 9 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan.

**Finding #2013-15:**

JPMS Cox verified whether the data reported on the FCC Form 555 for those states agreed with the detailed recertification results, with the following exception:

- JPMS Cox, PLLC was unable to test whether the number of subscribers per the FCC Forms 555 agreed to the corresponding recertification results for FCC Form 555 Column A, Number of Subscribers Claimed on February FCC Form(s) 497 of current Form 555 calendar year. This field was not included on the suggested template; therefore, it was not included in the recertification results provided by Windstream. However, we did test whether the number of subscribers per the FCC Forms 555 agreed to the number of subscribers per the FCC Forms 497 in Procedure 4 above.

There is no monetary effect associated with this finding.

*Beneficiary Response:*

As stated above, Windstream will revise its process to include any lines provided to Wireline Resellers in the total number of subscribers claimed in column “A” of Form 555 and not just include them in column “B”.

**Finding #2013-16:**

JPMS Cox, PLLC noted differences between the number of subscribers per the FCC Forms 555 and the corresponding recertification results for the following items:

- For Florida, the number of subscribers per the FCC Form 555 Column B (5) did not agree to the number of subscribers per the recertification results (0).
- For Florida, the number of subscribers per the FCC Form 555 Column D (5,211) did not agree to the number of subscribers per the recertification results (5,209).
- For Florida, the number of subscribers per the FCC Form 555 Column F (1,785) did not agree to the number of subscribers per the recertification results (1,783).
- For Florida, the number of subscribers per the FCC Form 555 Column H (1,785) did not agree to the number of subscribers per the recertification results (1,783).
- For Minnesota, the number of subscribers per the FCC Form 555 Column I (1) did not agree to the number of subscribers per the recertification results (0).

There were no differences noted for Kentucky between the number of subscribers per the FCC Form 555 and the corresponding recertification results.

As this finding was related to whether reporting was consistent among recertification results provided by the carrier and the presentation on Form 555, no monetary effect is associated with this finding.

*Beneficiary Response:*

Windstream will revise its process to ensure that the Form 555 ties to the Form 497 going forward.

***Procedure 6***

JPMS Cox, PLLC noted that this procedure, related to the non-usage rule, was not applicable to Windstream, consistent with the regulations in 47 C.F.R. § 54.405, because Windstream assesses and collects a monthly fee from Lifeline Program subscribers.

No exceptions noted.

***Procedure 7***

JPMS Cox, PLLC reviewed the Carrier's annual ETC certification, as provided in Item 13 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan. JPMS Cox, PLLC verified that the Carrier reported all the information and made all the certifications required by 47 C.F.R. § 54.422(a)(b).

No exceptions noted.

***Procedure 8***

JPMS Cox, PLLC reviewed the supporting schedules related to the Carrier's annual ETC certification, as provided in Item 13 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan. JPMS Cox, PLLC verified that the data reported on the annual ETC certification agreed with the supporting schedules, with the exception of the following:

**Finding #2013-17:**

- JPMS Cox, PLLC noted discrepancies between the data reported on the annual ETC certification and the supporting schedules related to the number of complaints for each of the six study areas. See discrepancies detailed below.

Study Area	Number of Complaints per 1,000 customers per the FCC Form 481:	Number of Complaints per 1,000 customers Calculated per the Detailed Schedule:
210336	2.4	27.7
260402	2.8	26.0
269690	3.4	28.6
269691	2.6	30.4
361414	1.4	8.8
361482	1.1	13.4

There is no monetary effect associated with this finding.

*Beneficiary Response:*

There was an error in the formula used for the FCC Form 481 filing to calculate the number of complaints per 1,000 customers. This has been corrected going forward.

***Procedure 9***

JPMS Cox, PLLC inquired of management on October 27, 2014, and obtained the Carrier's policies and procedures in response to Item 4 of Appendix A (Requested Documents) of the Lifeline Biennial Audit Plan for maintaining records that document compliance with the Lifeline program rules.

JPMS Cox, PLLC examined the Carrier's policies and procedures, and compared those policies and procedures, as well as management's responses to the inquiries, to the Commission's Rules set forth in 47 C.F.R. § 54.417.

JPMS Cox, PLLC noted no discrepancies between the Carrier's policies and procedures, management's responses to the inquiries, and the Commission's Rules.

No exceptions noted.

## Florida Lifeline Program Re-Certification

Lifeline is a federal program that helps qualified individuals pay for telephone service. It helps customers who have incomes at or below 150 percent of the federal poverty guidelines or receive help from any of the participating programs below.

The Lifeline program helps reduce the cost of basic monthly phone service for one telephone line. Customers who receive Lifeline assistance may also purchase optional services such as High Speed Internet or Caller ID at the normal cost.

- INSTRUCTIONS:**
1. Complete Section A. (required)
  2. If you are applying based on Program Participation, complete Section B. (if applicable)
  3. If you are applying based on Household Income, complete Sections C.
  4. Complete Section D. (required)

<b>A. Applicant Information</b>		
<b>The applicant must NOT be a dependent for federal income tax purposes unless he or she is 60 years of age or older.</b>		
Name: Last	First	M.I.
Current Home Telephone Number:		
Residence Street Address (No P.O. Box, Must be your principal address):		Apt/Floor/Other
City	State	Zip
This address is <input type="checkbox"/> Permanent <input type="checkbox"/> Temporary <input type="checkbox"/> Multi-Household at same address (complete Household Worksheet.)		
Billing Address: (if different from street address)		
Date of Birth:	Social Security Number (last 4 digits only)	
<b>How many people reside in your household?</b> _____		<b>No. of Dependents (including self)</b> _____

### Complete Section B or Section C

#### B. Eligibility Based on Program Participation

If you participate in one of the following programs, you are eligible for Lifeline – please put an “X” by the program(s) that apply to you. (If you select a program proceed to Section D).

- |   |   |
|---|---|
| <input type="checkbox"/> Federal Public Housing Assistance/Section 8<br><input type="checkbox"/> Supplemental Security Income (SSI)<br><input type="checkbox"/> Medicaid<br><input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP), formerly Food Stamps | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)<br><input type="checkbox"/> Low-Income Home Energy Assistance Program (LIHEAP)<br><input type="checkbox"/> National School Free Lunch Program |
|---|---|

#### C. Eligibility Based on Household Income

- I certify that my household income is at or below 150% of the Federal Poverty Guidelines (FGP).  
There are \_\_\_\_\_ individuals in my household.

(Continued on back)

**D. PLEASE READ THE FOLLOWING PROGRAM RULES AND SIGN**

Windstream is required by the Federal Communications Commission, or FCC, to verify your eligibility to participate in the Lifeline discount program and to advise you that willfully making false statements can result in fines, imprisonment, de-enrollment or being barred from the program. Each household is not permitted to receive Lifeline benefits from multiple providers.

Only one Lifeline discount is allowed per household. A household is defined as any individual or group of individuals who are living together at the same address as one economic unit. An economic unit consists of all adult individuals contributing to and sharing in the income and expense of a household.

**To qualify for the Lifeline discount program you must certify the following statements are true and agree to abide by the program's rules. You must indicate your acknowledgement of each statement by a checkmark.**

- I certify that the household in which I reside is not currently receiving a Lifeline discount from any other providers.

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- I agree that the Lifeline service is a nontransferable benefit and may not be transferred to anyone, including another eligible low-income consumer.

---

- I agree to notify Windstream within 30 calendar days if I move to another address and provide the new address.

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- I agree to notify Windstream within 30 calendar days if I am no longer, for any reason, receiving benefits from the federal or state program which qualified me for the Lifeline discount program, if my household income exceeds 150% of the Federal Poverty Guidelines, if I am receiving more than one Lifeline service, or if I no longer satisfy the criteria for receiving Lifeline support and I am subject to penalties if I fail to do so.

---

- I agree to participate in the certification of my continued eligibility in the Lifeline discount program on an annual basis.

---

- I agree to allow Windstream to provide the subscribers name, telephone number, and address to Universal Service Administrative Co (USAC) to verify my eligibility to participate in the Lifeline discount program.

I hereby certify under penalty of perjury that the information provided on this application is true and correct and reflects my current status of program participation or an accurate statement of HOUSEHOLD Income.

\_\_\_\_\_  
Signature of Applicant

\_\_\_\_\_  
Date

<p><b>Return Completed Application and Proof Documents to:</b>                  Windstream Communications                  ATTN: Support Services-Lifeline                  1720 Galleria Boulevard                  Charlotte, North Carolina 28270                  FAX: (704) 849-7000                  OR Email to <a href="mailto:WCLife.Line.Charlotte@windstream.com">WCLife.Line.Charlotte@windstream.com</a>                  Any questions, please contact Windstream at 1-800-347-1991</p>	<p style="text-align: center;"><b><u>For Official Use Only</u></b></p> <p>Eligibility Form Reviewed: _____</p> <p>Reviewed By: _____</p> <p>Representative Signature: _____</p> <p>Date: _____</p>
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## Minnesota Lifeline Program Re-Certification

Lifeline is a federal program that helps qualified individuals pay for telephone service. It helps customers who have incomes at or below 135 percent of the federal poverty guidelines or receive help from any of the participating programs below.

The Lifeline program helps reduce the cost of basic monthly phone service for one telephone line. Customers who receive Lifeline assistance may also purchase optional services such as High Speed Internet or Caller ID at the normal cost.

- INSTRUCTIONS:**
1. Complete Section A. (required)
  2. If you are applying based on Program Participation, complete Section B. (if applicable)
  3. If you are applying based on Household Income, complete Sections C.
  4. Complete Section D. (required)

<b>A. Applicant Information</b>		
<b>The applicant must NOT be a dependent for federal income tax purposes unless he or she is 60 years of age or older.</b>		
Name: Last	First	M.I.
Current Telephone Number:		
Residence Street Address (No P.O. Box, Must be your principal address):		Apt/Floor/Other
City	State	Zip
This address is <input type="checkbox"/> Permanent <input type="checkbox"/> Temporary <input type="checkbox"/> Multi-Household at same address (complete Household Worksheet.)		
Billing Address: (if different from street address)		
Date of Birth:	Social Security Number (last 4 digits only)	
<b>How many people reside in your household?</b> _____		<b>No. of Dependents (including self)</b> _____

**Complete Section B or Section C**

**B. Eligibility Based on Program Participation**

If you participate in one of the following programs, you are eligible for Lifeline – please put an “X” by the program(s) that apply to you. (If you select a program proceed to Section D).

- |   |  |
|---|--|
| <input type="checkbox"/> Federal Public Housing Assistance/Section 8<br><input type="checkbox"/> Supplemental Security Income (SSI)<br><input type="checkbox"/> Medicaid<br><input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP), formerly Food Stamps | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF)<br><input type="checkbox"/> Low-Income Home Energy Assistance Program (LIHEAP)<br><input type="checkbox"/> National School Free Lunch Program<br><input type="checkbox"/> Minnesota Family Investment Program (MFIP) |
|---|--|

**C. Eligibility Based on Household Income**

- I certify that my household income is at or below 135% of the Federal Poverty Guidelines (FGP).  
There are \_\_\_\_\_ individuals in my household.

**D. PLEASE READ THE FOLLOWING PROGRAM RULES AND SIGN**

Windstream is required by the Federal Communications Commission, or FCC, to verify your eligibility to participate in the Lifeline discount program and to advise you that willfully making false statements can result in fines, imprisonment, de-enrollment or being barred from the program. Each household is not permitted to receive Lifeline benefits from multiple providers.

Only one Lifeline discount is allowed per household. A household is defined as any individual or group of individuals who are living together at the same address as one economic unit. An economic unit consists of all adult individuals contributing to and sharing in the income and expense of a household.

**To qualify for the Lifeline discount program you must certify the following statements are true and agree to abide by the program’s rules. You must indicate your acknowledgement of each statement by a checkmark.**

- I certify that the household in which I reside is not currently receiving a Lifeline discount from any other providers.

---

- I agree that the Lifeline service is a nontransferable benefit and may not be transferred to anyone, including another eligible low-income consumer.

---

- I agree to notify Windstream within 30 calendar days if I move to another address and provide the new address.

---

- I agree to notify Windstream within 30 calendar days if I am no longer, for any reason, receiving benefits from the federal or state program which qualified me for the Lifeline discount program, if my household income exceeds 135% of the Federal Poverty Guidelines, if I am receiving more than one Lifeline service, or if I no longer satisfy the criteria for receiving Lifeline support and I am subject to penalties if I fail to do so.

---

- I agree to participate in the certification of my continued eligibility in the Lifeline discount program on an annual basis.

---

- I agree to allow Windstream to provide the subscribers name, telephone number, and address to Universal Service Administrative Co (USAC) to verify my eligibility to participate in the Lifeline discount program.

I hereby certify under penalty of perjury that the information provided on this application is true and correct and reflects my current status of program participation or an accurate statement of HOUSEHOLD Income.

\_\_\_\_\_  
Signature of Applicant

\_\_\_\_\_  
Date

<p><b>Return Completed Application and Proof Documents to:</b>  Windstream Communications  ATTN: Support Services-Lifeline  1720 Galleria Boulevard  Charlotte, North Carolina 28270  FAX: (704) 849-7000  OR Email to <a href="mailto:WCLife.Line.Charlotte@windstream.com">WCLife.Line.Charlotte@windstream.com</a>  Any questions, please contact Windstream at 1-800-347-1991</p>	<p style="text-align: center;"><b><u>For Official Use Only</u></b></p> Eligibility Form Reviewed: _____ Reviewed By: _____ Representative Signature: _____ Date: _____
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## Lifeline Program Re-Certification

**Alabama, Arkansas, Iowa, Kentucky, Mississippi, Missouri, N. Carolina, and S. Carolina**

Lifeline is a federal program that helps qualified individuals pay for telephone service. It helps customers who have incomes at or below 135 percent of the federal poverty guidelines or receive help from any of the participating programs below.

The Lifeline program helps reduce the cost of basic monthly phone service for one telephone line. Customers who receive Lifeline assistance may also purchase optional services such as High Speed Internet or Caller ID at the normal cost.

- INSTRUCTIONS:**
1. Complete Section A. (required)
  2. If you are applying based on Program Participation, complete Section B. (if applicable)
  3. If you are applying based on Household Income, complete Sections C.
  4. Complete Section D. (required)

<b>A. Applicant Information</b>		
<b>The applicant must NOT be a dependent for federal income tax purposes unless he or she is 60 years of age or older.</b>		
Name: Last	First	M.I.
Current Home Telephone Number:		
Residence Street Address (No P.O. Box, Must be your principal address):		Apt/Floor/Other
City	State	Zip
This address is <input type="checkbox"/> Permanent <input type="checkbox"/> Temporary <input type="checkbox"/> Multi-Household at same address (complete Household Worksheet.)		
Billing Address: (if different from street address)		
Date of Birth:		Social Security Number (last 4 digits only)
<b>How many people reside in your household?</b> _____		<b>No. of Dependents (including self)</b> _____

**Complete Section B or Section C**

**B. Eligibility Based on Program Participation**

If you participate in one of the following programs, you are eligible for Lifeline – please put an “X” by the program(s) that apply to you. (If you select a program proceed to Section D).

- |  |   |
|--|---|
| <p>___ Federal Public Housing Assistance/Section 8</p> <p>___ Supplemental Security Income (SSI)</p> <p>___ Medicaid</p> <p>___ Supplemental Nutrition Assistance Program (SNAP), formerly Food Stamps</p> | <p>___ Temporary Assistance for Needy Families (TANF)</p> <p>___ Low-Income Home Energy Assistance Program (LIHEAP)</p> <p>___ National School Free Lunch Program</p> |
|--|---|

**C. Eligibility Based on Household Income**

- I certify that my household income is at or below 135% of the Federal Poverty Guidelines (FGP).  
There are \_\_\_\_\_ individuals in my household.

(Continued on back)

**D. PLEASE READ THE FOLLOWING PROGRAM RULES AND SIGN**

Windstream is required by the Federal Communications Commission, or FCC, to verify your eligibility to participate in the Lifeline discount program and to advise you that willfully making false statements can result in fines, imprisonment, de-enrollment or being barred from the program. Each household is not permitted to receive Lifeline benefits from multiple providers.

Only one Lifeline discount is allowed per household. A household is defined as any individual or group of individuals who are living together at the same address as one economic unit. An economic unit consists of all adult individuals contributing to and sharing in the income and expense of a household.

**To qualify for the Lifeline discount program you must certify the following statements are true and agree to abide by the program’s rules. You must indicate your acknowledgement of each statement by a checkmark.**

- I certify that the household in which I reside is not currently receiving a Lifeline discount from any other providers.

---

- I agree that the Lifeline service is a nontransferable benefit and may not be transferred to anyone, including another eligible low-income consumer.

---

- I agree to notify Windstream within 30 calendar days if I move to another address and provide the new address.

---

- I agree to notify Windstream within 30 calendar days if I am no longer, for any reason, receiving benefits from the federal or state program which qualified me for the Lifeline discount program, if my household income exceeds 135% of the Federal Poverty Guidelines, if I am receiving more than one Lifeline service, or if I no longer satisfy the criteria for receiving Lifeline support and I am subject to penalties if I fail to do so.

---

- I agree to participate in the certification of my continued eligibility in the Lifeline discount program on an annual basis.

---

- I agree to allow Windstream to provide the subscribers name, telephone number, and address to Universal Service Administrative Co (USAC) to verify my eligibility to participate in the Lifeline discount program.

I hereby certify under penalty of perjury that the information provided on this application is true and correct and reflects my current status of program participation or an accurate statement of HOUSEHOLD Income.

\_\_\_\_\_  
Signature of Applicant

\_\_\_\_\_  
Date

<p><b>Return Completed Application and Proof Documents to:</b>  Windstream Communications  ATTN: Support Services-Lifeline  1720 Galleria Boulevard  Charlotte, North Carolina 28270  FAX: (704) 849-7000  OR Email to <a href="mailto:WCLife.Line.Charlotte@windstream.com">WCLife.Line.Charlotte@windstream.com</a>  Any questions, please contact Windstream at 1-800-347-1991</p>	<p style="text-align: center;"><b><u>For Official Use Only</u></b></p> Eligibility Form Reviewed: _____ Reviewed By: _____ Representative Signature: _____ Date: _____
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Do not print



Act Now to Keep Your Telephone Service Discounts

[DATE]

Customer Name  
Customer Address  
City, State Zip

Dear Lifeline Customer:

You are currently enrolled in the Federal Lifeline Program (Lifeline) which provides financial assistance to low-income customers. To continue receiving discounts on your telephone service Federal law requires that you verify your eligibility.

To keep your Lifeline discounts

1. Complete and sign the enclosed Re-Cerification form.
2. Return Complete Form to:

Windstream Communications  
ATTN: Support Services – Lifeline  
1720 Galleria Boulevard  
Charlotte, North Carolina 28270

or FAX: (704) 849-7000

Or Email to: [WCI.Life.Line.Charlotte@windstream.com](mailto:WCI.Life.Line.Charlotte@windstream.com)

If you do not return a completed and signed form with required documentation by [date], you will no longer receive discounts. The amount you pay for telephone service will increase.

If you have any questions, please contact Windstream at 1-800-347-1991.

Thank you for taking the time to complete the re-certification process.

Sincerely,

Windstream Communications