



RON L. TRULLINGER

April 23, 2015

Oregon Public Utility Commission
Attention: Filing Center
P.O. Box 1088
3930 Fairview Industrial Dr SE
Salem, Oregon 97308-1088

RE: CenturyLink's Lifeline Audit Report Filing Pursuant to 47 C.F.R. §54.420

Dear Commission:

Pursuant to 47 C.F.R. §54.420 of the Federal Communications Commission's ("FCC") rules, CenturyLink hereby provides a copy of its Lifeline Biennial Audit Report as issued and filed with the FCC on April 2, 2015. This report covers the audit period of January 1, 2014 through December 31, 2014.

Please contact me at (503) 242-5089 if you have any questions regarding this filing.

Sincerely,

A handwritten signature in blue ink that reads "Ron L. Trullinger".

Ron Trullinger
State Regulatory Affairs Director

Attachment

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Portland, OR 97205
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John E. Benedict
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Via ECFS

April 2, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW-A325
445 12th Street, S.W.
Washington, DC 20554

RE: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

In connection with the above-referenced proceeding and pursuant to the Public Notices of April 2, 2014 and September 19, 2014,¹ CenturyLink encloses its final Lifeline Program Biennial Audit Report to the FCC. This Report covers the audit period of January 1, 2014 through December 31, 2014.

A copy of the CenturyLink report is also being submitted today under separate cover to Karen Majcher of USAC.

Please contact me if you have any questions concerning this matter.

Sincerely,

/s/ John E. Benedict

Enclosure

¹ *Wireline Competition Bureau Announces Release of Final Lifeline Biennial Audit Plan*, WC Docket No. 11-42, Public Notice, 29 FCC Rcd 3568 (Apr. 2, 2014); *Erratum*, Public Notice, 29 FCC Rcd 11297 (Sept. 19, 2014). The requirement to annually file a Lifeline Biennial Audit Plan was adopted by the FCC in the *Lifeline Reform Order*, 27 FCC Rcd 6656, released on February 6, 2012.

Marlene H. Dortch

April 2, 2015

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Copies to:

Anita Patankar-Stoll (anita.patankar-stoll@fcc.gov)

Charles Tyler (charles.tyler@fcc.gov)

Thomas Buckley (thomas.buckley@fcc.gov)



KPMG LLP
Suite 800
1225 17th Street
Denver, CO 80202-5598

Independent Accountants' Report on Applying Agreed-Upon Procedures

To the Managements of CenturyLink, Inc. ("CenturyLink" or "the Company"),
the Universal Service Administrative Company ("USAC"); and
the Federal Communications Commission ("FCC" or "Commission"):

We have performed the procedures enumerated in Attachment A, 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,¹ solely to assist you in evaluating CenturyLink's 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 year ended December 31, 2013. CenturyLink's management is responsible for compliance with the Rules. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and by Generally Accepted Government Auditing Standards ("GAGAS") issued by the Government Accountability Office (2011 Revision).² The sufficiency of these procedures is solely the responsibility of the specified parties. Consequently, we make no representation regarding the sufficiency of the procedures described in Attachment A 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 A 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.³

We were not engaged to, and did not, conduct an examination, the objective of which would be the expression of an opinion on CenturyLink'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.

¹ See *Wireline Competition Bureau Announces Release of Final Lifeline Biennial Audit Plan*, WC Docket No. 11-42, Public Notice, DA 14-450 (rel. Apr. 2, 2014).

² See U.S. Government Accountability Office, *Government Auditing Standards*, GAO 12-331G (rev. Dec. 2011).

³ See 18 U.S.C. § 1028(d)(7) (definition of means of identification) and 47 U.S.C. § 222(h)(1) (definition of customer proprietary network information).



This report is intended solely for the information and use of CenturyLink, 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.

KPMG LLP

April 1, 2015

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

Objective 1: Carrier Obligation to Offer Lifeline.

Procedure 1

KPMG inquired of CenturyLink’s management on September 16, 2014 and obtained the Company’s policies and procedures for offering Lifeline service to qualifying low-income consumers.

KPMG examined CenturyLink’s policies and procedures, and compared those policies and procedures, as well as management’s responses to our inquiries, to the Commission’s Lifeline Rules set forth in 47 C.F.R. Section 54.405, noting no exceptions.

Procedure 2

KPMG inspected 10 examples of CenturyLink’s marketing materials describing the Lifeline service (i.e., print, audio, video and web materials used to describe or enable subscribers to enroll in the Lifeline service offering, including standard scripts used when enrolling new subscribers, and application and certification forms).

KPMG noted the marketing materials contained the required information below:

- The service is a Lifeline service, which is a government assistance program;
- The service is non-transferable;
- Only eligible subscribers may enroll;
- Only one Lifeline discount is allowed per household; and
- CenturyLink’s name is used to market the service

Procedure 3

KPMG requested 50 recorded customer service calls from the year ended December 31, 2013 for Lifeline subscribers. KPMG was able to review a sample of recorded calls from August 2014, however, due to CenturyLink data retention limitations, KPMG was unable to review a sample of recorded calls from the year ended December 31, 2013 and noted an exception.

Management Response:

CenturyLink did not interpret that the customer service calls component of the audit required recorded calls from the specified audit period. In the FCC’s draft Audit plan released in September 2013, the customer service call requirement was for the auditor to listen to live, and thus, by definition, current calls that were not within the specified audit period. Subsequently, on April 2, 2014 the requirement was changed to a sampling of recorded calls after commenters, including CenturyLink, noted they do not have customer service representatives dedicated to Lifeline customers and as such requiring an auditor to wait for a certain number of Lifeline-specific calls to come through was inefficient. Based on this change, CenturyLink understood the customer service call requirement would use reasonably contemporaneous Lifeline-specific recorded calls that would effectively substitute for live calls.

Lifeline providers did not receive notice prior to the audit period that retention of customer service calls regarding Lifeline service is necessary to demonstrate compliance with Lifeline program requirements. The obligation to produce recorded customer service calls is a new requirement of the final biennial audit plan released on April 2, 2014. However, while the obligation to produce, and thus retain, such calls did not exist until April 2, 2014, this audit is requiring production of such calls for a time period prior to that date.

CenturyLink agrees that going forward, if the requirement is for Lifeline-specific recorded calls during the specified audit period, the company will retain 50 Lifeline-specific recorded calls on a biannual basis for Lifeline biennial audit purposes. As a practical matter, CenturyLink cannot retain recordings of all its incoming customer service calls for three years. The company submits that the more effective implementation of this audit requirement would be to use more contemporaneous Lifeline-specific recorded calls retained within a Lifeline provider's normal course of business.

Procedure 4

KPMG inquired of CenturyLink's management on September 16, 2014 and obtained the Company's policies and procedures for de-enrollment from the Lifeline program, including when the Eligible Telecommunications Carrier ("ETC") will de-enroll subscribers based on lack of eligibility, duplicative support, non-usage and failure to recertify.

KPMG examined CenturyLink's policies and procedures, and compared those policies and procedures, as well as management's responses to our inquiries, to the Commission's Lifeline Rules set forth in 47 C.F.R. Section 54.405, noting no exceptions.

KPMG obtained and reviewed the templates for notification of pending de-enrollment due to subscriber's failure to re-certify during the annual re-certification process. KPMG attached 2 templates provided by CenturyLink to the end of this report.

Objective 2: Consumer Qualification for Lifeline.

Procedure 1

KPMG inquired of CenturyLink's management on September 16, 2014 and obtained the Company's policies and procedures for limiting Lifeline support to a single subscription per household.

KPMG examined CenturyLink's policies and procedures, and compared those policies and procedures, as well as management's responses to our inquiries, to the Commission's Lifeline Rules set forth in 47 C.F.R. Section 54.409.

KPMG noted the following regarding CenturyLink's policies and procedures, management's responses to our inquiries, and the Commission's Lifeline Rules:

- CenturyLink's current Lifeline policy does not request or require Household Worksheets for 'known' multi-dwelling units, such as Nursing Homes.

Management Response:

As prescribed by the Lifeline Reform Order in 2013, CenturyLink checked all addresses of new Lifeline applicants to determine if Lifeline was already being given at that address by CenturyLink. If there was Lifeline at the address, CenturyLink required the customer to complete an Independent Economic Household ("IEH") form in order to obtain the Lifeline discount. When a customer service location was identified as a specific

address, such as apt, room, suite, etc. CenturyLink considered it to be a separate household and did not require additional IEH information.

Procedure 2

KPMG inquired of CenturyLink’s management on September 16, 2014 to discuss the procedures in place to ensure it has accurately completed the FCC Form 497. KPMG reviewed the Company’s procedures, and management’s responses to our inquiries, and compared the results to the Commission’s Lifeline rules set forth in 47 C.F.R. Section 54.409, noting no exceptions.

Procedure 3

KPMG obtained CenturyLink’s subscriber list and FCC Form 497 for each study area in the selected states (Minnesota, North Dakota and Wisconsin) for March 2013. KPMG compared the number of subscribers reported on the Form 497s to the number of subscribers contained on the Subscriber List for each study area, noting no exceptions.

Procedure 4

KPMG conducted computer-assisted audit techniques and examined the Subscriber List obtained in Procedure 3 above for duplicate addresses with different subscribers receiving Lifeline support. KPMG noted eight sets of duplicate addresses where different subscribers (two subscribers per address) received Lifeline support.

KPMG noted a monetary finding which totaled \$74.00 for duplicative support claimed on the March 2013 FCC Form 497s filed in the selected states of Minnesota and Wisconsin.

Management Response:

Of the 24,658 customer records tested, only 8 duplicate service addresses were identified, which means .0324% of the customers reviewed were duplicates. Today, the National Lifeline Accountability Database (“NLAD”) performs the required duplicates checks and CenturyLink participates in utilizing the NLAD. Additionally, as of 11/24/2014, all 8 duplicates identified have been corrected, either by removing the discount or by service disconnects.

Procedure 5

KPMG compiled a list of all duplicate addresses with different subscribers noted in Procedure 4 above and requested copies of the one-per-household certification form for each of the 58 subscribers identified. KPMG inspected the certification forms to determine whether the selected subscribers certified to only receiving one Lifeline-supported service in his/her household using the one-per household worksheet.

KPMG noted that Household Worksheets and related certifications were missing for nineteen of the 58 subscribers. KPMG noted the Household Worksheets for the remaining 39 subscribers included the subscriber certification confirming that the customer only received one Lifeline-supported service in his/her household.

Management Response:

CenturyLink agrees that it should have completed Household Worksheets from customers when two or more customers are receiving Lifeline service at the same address. Most of the missing Household Worksheets here were for situations where both customers were CenturyLink customers prior to the Lifeline Reform Order (“Order”). CenturyLink did not undertake an examination of its existing base of customers that were on Lifeline prior to the Order for possible duplicate addresses. Instead, as prescribed by the Order, during calendar year

2013, CenturyLink checked all addresses of new Lifeline applicants to determine if Lifeline was already being given at that address by CenturyLink. If there was Lifeline at the address, CenturyLink required the customer to complete an IEH form in order to obtain the Lifeline discount. When a customer service location was identified as a specific address, such as apt, room, suite, etc. CenturyLink considered it to be a separate household and did not require additional IEH information.

Objective 3: Subscriber Eligibility Determination and Certification.

Procedure 1

KPMG inquired of CenturyLink’s management on September 15, 2014 and obtained the Company’s policies and procedures for ensuring that its Lifeline subscribers are eligible to receive Lifeline services.

KPMG examined CenturyLink’s policies and procedures, and compared those policies and procedures, as well as management’s responses to our inquiries, to the Commission’s Lifeline rules set forth in 47 C.F.R. Section 54.410.

KPMG noted no exceptions between the Company’s policies and procedures, management’s responses to the inquiries, and the Commission’s Lifeline Rules. KPMG noted that CenturyLink does not retain copies of subscribers’ proof of income or program-based eligibility. KPMG also noted CenturyLink’s policies require eligibility verification of each low-income customer prior to providing Lifeline service to that customer.

Procedure 2

KPMG inquired of CenturyLink management on September 15, 2014 and obtained the Company’s policies and procedures for training employees and agents for ensuring that the ETC’s subscribers are eligible to receive Lifeline services.

KPMG examined the CenturyLink’s policies and procedures, and compared those policies and procedures, as well as management’s responses to our inquiries, to the Commission’s Lifeline Rules set forth in 47 C.F.R. Section 54.410, noting no exceptions.

KPMG noted all employees responsible for evaluating subscriber eligibility are required to complete Lifeline specific training as part of their CenturyLink employee on-boarding process. All training is conducted on-site at CenturyLink’s support center, which includes a two week “shadow” period of senior or experienced staff. Any additional training or updated information specific to Lifeline is communicated to the assigned employees and managed through the employee welcome screen. The trainings or updates are conducted online and the results are monitored by the employee’s manager and the operations team. Additionally, KPMG noted the NLAD was not implemented during the period (January 1 to December 31, 2013) and any test procedures regarding NLAD are not applicable.

Procedure 3

KPMG obtained the Subscriber List for each study area in the selected states (states selected for review were: Minnesota, North Dakota and Wisconsin) for March 2013. KPMG randomly selected 100 subscribers from the Subscriber List that were enrolled in the program after June 1, 2012.

KPMG inspected the subscriber’s certification and recertification forms (where applicable) and compared the forms to verify they contained the information required by the Commission’s Lifeline Rules set forth in 47 C.F.R. Section 54.410. KPMG compared the Company’s subscriber eligibility criteria on the certification and recertification forms to the federal eligibility criteria set forth in the Commission’s Lifeline Rules. KPMG

verified the subscribers completed all required elements as required by the Commission's Lifeline Rules and initialed or signed where applicable. KPMG inspected the forms to validate the initial certification form was dated prior to or on the same day as the Lifeline start date per the Subscriber List. KPMG verified that CenturyLink's forms require subscribers to certify to residing on tribal lands, as applicable. Additionally, KPMG reviewed the list of data sources or documentation the Company reviewed to confirm the subscriber's eligibility to verify the data sources were eligible per the Commission's Lifeline Rules set forth in 47 C.F.R. Section 54.417.

KPMG noted the following related to CenturyLink's certification and recertification forms, subscriber eligibility criteria, and the list of data sources or documentation reviewed to the Commission's Lifeline Rules:

- CenturyLink was unable to provide initial certification forms for two of the selected subscribers.
- CenturyLink was unable to provide the data source or documentation reviewed to determine subscriber eligibility for the Lifeline program for 11 subscribers.

KPMG also noted the following related to subscriber certification to the required elements as required by the Commission's Lifeline Rules:

- Thirteen subscribers did not either initial or sign (where applicable) to certify to all of the required elements on the certification or recertification forms as required by the Commission's Lifeline Rules.

KPMG noted no exceptions in comparing the initial certification forms and the Lifeline start date per the Subscriber List. Additionally, the sample of subscribers did not contain Tribal residents and as such, the procedure related to certification to residing on Tribal lands was not applicable.

Management Response:

For the 2 instances of missing applications, CenturyLink does not add Lifeline to an account until the customer completes an application form and provides documentation that they are eligible. Applications are stored electronically by telephone number. It is possible that when the 2 missing forms were filed, an incorrect telephone number was entered, thus making it very difficult to locate the forms.

In response to the 11 instances lacking the data documentation source, CenturyLink process documents include examples of acceptable notes that should be entered on each account to identify the source eligibility documentation relied upon to approve the customer for Lifeline. Going forward, CenturyLink will spot check approvals to confirm that reps are consistently using these guidelines.

Finally, in response to 13 instances of incomplete certifications, there are at least 9 certifications on the application form that applicants must checkmark or initial. In each of the 13 incomplete certifications found in this audit, there was only one line on the form that the applicant failed to check or initial, but in each case the application form was signed by the applicant. CenturyLink process documents include the requirement to check that the application form has been completed in full, but since the review process is manual, it is possible for a rep to overlook a line on the form that was not initialed. CenturyLink will continue to regularly train Lifeline reps on the Lifeline application process requirements as well as spot check certifications for completion. Of these 13 applicants, 6 were recertified with completed Interactive Voice Response ("IVR") or recertification forms in 2014, 4 failed 2014 recertification and were removed from the program and 3 disconnected their service with CenturyLink prior to 2014 recertification.

Objective 4: Annual Certification and Recordkeeping by Eligible Telecommunications Carriers.

Procedure 1

KPMG inquired of CenturyLink management on September 17, 2014 and obtained the Company's policies and procedures for ensuring that the Company has obtained and submitted the annual certifications required under the Commission's Lifeline Rules set forth in 47 C.F.R. Section 54.416.

KPMG examined CenturyLink's policies and procedures, and compared those policies and procedures, as well as management's responses to our inquiries, to the Commission's Lifeline Rules, noting no exceptions.

Procedure 2

KPMG requested CenturyLink's FCC Form 555 that was filed in January 2014 for the study areas within the selected states of Minnesota, North Dakota and Wisconsin, which represented the subscribers recertified during the calendar year 2013.

KPMG examined the FCC Form 555 filed for the study areas in the selected states (Minnesota, North Dakota and Wisconsin) and reviewed the certifications completed by an officer of the Company, noting no exceptions.

KPMG noted an officer of CenturyLink made all certifications on the FCC Form 555s as required by the Commission's Lifeline Rules. KPMG noted in instances where CenturyLink confirmed consumer eligibility by relying on income or eligibility databases, the Company attested as to what specific data source they used to confirm eligibility.

Procedure 3

KPMG requested the Company's organizational chart. KPMG reviewed CenturyLink's organizational chart and verified that the certifying officer on the FCC Form 555s for the study areas within the selected states (Minnesota, North Dakota and Wisconsin) is an officer of the Company per the organizational chart.

Procedure 4

KPMG obtained the FCC Form 555 filed in January 2014 for the selected states (Minnesota, North Dakota and Wisconsin) and the respective Form 497s filed in February 2013.

KPMG verified the subscriber count per the FCC Form 555 agreed with the total subscriber count per the February Form 497 for the selected states of Minnesota, North Dakota and Wisconsin, noting no exceptions.

Procedure 5

KPMG requested the recertification records for the states of Minnesota, North Dakota and Wisconsin to verify the recertification results agreed to the data reported on the Form 555, in response to Item 9 of Appendix A.

KPMG reviewed the recertification results of the individual subscribers reported on the FCC Form 555 filed in January 2014 for the selected states (Minnesota, North Dakota and Wisconsin). KPMG verified that the data reported on the FCC Form 555 for the selected states agreed with the detailed recertification results, with the exception of the following:

- The number of subscribers reported in FCC Form 555 Column I "Subscribers who de-enrolled prior to direct contact to recertify eligibility" was over-reported in the following states:
 - o Minnesota- Over-reported 37 subscribers.

- North Dakota- Over-reported 8 subscribers.
- The number of subscribers reported in FCC Form 555 Column B “Number of Lines claimed on February Form 497 provided to Wireline Resellers” was over-reported in the following state:
 - Minnesota- Over-reported 1 subscriber.

Management Response:

This was a limited issue to one block (“I”) of the Form 555, and was strictly a reporting issue. CenturyLink extracted currently active Lifeline accounts from the subscriber “Snapshot” list to develop our mailing lists for the recertifications. After developing the mailing lists, we (CenturyLink) realized that in some cases the mailing lists contained some accounts/subscribers more than once. So, we removed any multiple identical listings from the mailing list. However, we failed to account for those multiple account listings in the snapshot file. We calculated Block I by taking the difference between the count of customers on the snapshot and the count of customers on the mailing list, assuming that anyone not on the mailing list was no longer on Lifeline. Since the snapshot had not been modified to account for the multiple listings, in some cases we overstated Block I on the form.

Procedure 6

KPMG noted that CenturyLink is not subject to the non-usage rules, as required by the Commission’s Lifeline Rules set forth in C.F.R. Section 54.407.

KPMG verified CenturyLink is not required to track or report non-usage for subscribers as required by the Commission’s Lifeline Rules as they collect a monthly fee from all Lifeline subscribers. As such, this procedure is not applicable.

Procedure 7

KPMG inquired of CenturyLink to determine if the Company is required to complete the annual ETC certification and report relevant information.

KPMG noted that CenturyLink is required to complete the annual ETC certifications and made all the certifications required by 47 C.F.R. §54.422(a).

Procedure 8

KPMG requested of CenturyLink copies of the supporting schedules from CenturyLink related to the annual ETC certifications for the selected states (Minnesota, North Dakota and Wisconsin).

KPMG reviewed the supporting schedules related to the selected states’ annual ETC certifications and verified that the data reported on the certifications agrees with the supporting schedules as required by 47 C.F.R. §54.422(a).

Procedure 9

KPMG inquired of CenturyLink’s management on September 17, 2014 and obtained the Company’s policies and procedures for maintaining records that document compliance with the Commission’s Lifeline Program Rules.

KPMG examined the Company’s policies and procedures, and compared those policies and procedures, as well as management’s responses to our inquiries, to the Commission’s Lifeline rules set forth in 47 C.F.R.

Agreed-Upon Procedures Report – Attachment A
CenturyLink, Inc.

Section 54.417, and verified that CenturyLink maintains records that document compliance with the Commission's Lifeline Program Rules, but noted the following:

- CenturyLink does not retain the Lifeline recorded customer calls to document compliance with the Commission's Lifeline rules. *Please note this finding is also discussed above at Objective 1, Procedure 3.*

Management Response:

See Beneficiary Response to the exception noted at Objective 1, Procedure 3.

May 03, 2013



John Q. Sample
123 Anystreet
Anytown, US 12345-6789

ACT NOW TO KEEP YOUR LIFELINE DISCOUNT

Ref 123456789

Dear CenturyLink Lifeline Customer:

In accordance with the Federal Communications Commission's rules, all Lifeline providers are required to annually verify consumer's eligibility for Lifeline assistance. Thus, CenturyLink, your local telecommunications company, must verify that customers who receive Lifeline discounts are still eligible to receive this assistance.

In order for your Lifeline assistance to remain in effect, you must certify your Lifeline eligibility based on your income or benefits you receive from a qualifying federal or state aid program. A list of the qualifying aid programs is shown on the enclosed Lifeline recertification form. As a reminder, only one Lifeline discount is allowed per household¹. This applies to all phones in the household, including landline and wireless phones. Also, Lifeline is a federal benefit, and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.

If you qualify for Lifeline assistance under the Federal eligibility criteria listed on the first page of the attached recertification form, you need to either 1) complete this form entirely and return it to CenturyLink in the enclosed envelope or 2) call 866-609-3712 to complete the Recertification Survey over the phone. Please note that the phone option will require the Recertification PIN number located in the upper left corner of the application. The phone option will guide you through the process and allow you to correct errors. If your state has state specific programs and you qualify for Lifeline assistance under one of the state specific eligibility criteria listed on the third page please respond by completing, signing and returning the form to CenturyLink at the address shown on the form.

If the account information on the form is not correct, please contact us immediately at the toll free number located on the back of the recertification form so that we can make the necessary changes to your account. If you do not complete and return your paper form or complete the telephone survey as instructed, you will lose your lifeline benefit and be required to re-apply for Lifeline.

CenturyLink must receive your completed and signed recertification form or your completed response via the telephone survey by June 03, 2013 to continue to provide your Lifeline discount. If the form or completed telephone survey is not received by June 03, 2013 or your returned form is incorrect or incomplete, your Lifeline discounts will expire and be removed from your account. This will result in an increase in the amount you need to pay for your monthly phone bill.

If you have questions, please call us toll-free at the number listed on the recertification form.

Sincerely

CenturyLink Customer Service



Recertification Checklist – Please provide the following:

1. Signed and completed Lifeline Assistance Program – Recertification Form.
2. Make sure you have filled in the boxes and circles for the last four digits of the account holders Social Security number and Date of Birth.
3. Be sure to indicate the programs which program you currently participate by placing a check in the corresponding box. (Either Federal or State specific programs)

¹ A household is defined, for the purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.

SAMPLE

LIFELINE ASSISTANCE PROGRAM – RECERTIFICATION FORM

Please Read All Instructions Carefully Before Completing

Please respond completely. Inaccurate or incomplete responses may cause your Lifeline benefits to be terminated. The information on this application will only be used to assess your continued eligibility for Lifeline Assistance.

If the account information on the form is not correct or the account holder identified below is deceased, please contact us immediately at the toll free number located on the back of this form so that we can correct your account.

The name on the account must be the same as the name on this lifeline recertification form. Please make necessary changes to the information, complete and return the form to the address listed on the back of this form.

Telephone Number 123-456-789	First Name John	Last Name Sample		
Service Address 123 Anystreet		City Anytown	State US	Zip code 12345
<small>We classify this as your permanent address in our records. Check if you disagree <input type="checkbox"/></small>				

Fill in each area completely with either blue or black ink.

Write the last 4 digits of your social security number or Tribal ID.

X X X - X X - [] [] [] []

Please check if this is your Tribal ID:

Write your birth date. Single digit days and months are preceded with a zero. For example a birth date of May 1st 1950 is shown as 05 01 1950.

M M / D D / Y Y Y Y
[] [] / [] [] / [] [] [] []

PLEASE CHECK programs in which you or your household currently participates. (Additional State-specific programs in which you may be participating are listed on the last page):

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

If you are receiving Lifeline assistance because a member of your household besides you participates in one of these programs, provide his/her name and certify that he/she is a member of your household here:

Name of Participant (please print) _____

_____ (Please Initial) I certify that this program participant is a member of my household.

INCOME GUIDELINES (Documentation Required): If you do not participate in any of the programs above, but are receiving Lifeline Assistance because your annual household income is at or below the amounts shown below depending on the size of your household, PLEASE CHECK the corresponding box of your income-based eligibility. Please indicate the number of household members.

Check the box next to the Number of members in the household	All States Not Listed to the Right	KS, NM, Owyhee, NV & Mountain City, NV FL, MI, NJ (seniors 65 and older), OH, and TX	NV: All other Areas (excluding Owyhee & Mountain City)	
	Number in the Household	135% of Federal Poverty Level	150% of Federal Poverty Level	175% of Federal Poverty Level
1 <input type="checkbox"/> 8 <input type="checkbox"/> 15 <input type="checkbox"/>	1	\$ 0 - \$15,512	\$0 - \$17,235	\$0 - \$20,108
2 <input type="checkbox"/> 9 <input type="checkbox"/> 16 <input type="checkbox"/>	2	\$15,513 - \$20,939	\$17,235 - \$23,295	\$20,109 - \$27,143
3 <input type="checkbox"/> 10 <input type="checkbox"/> 17 <input type="checkbox"/>	3	\$20,940 - \$26,366	\$23,296 - \$29,295	\$27,143 - \$34,178
4 <input type="checkbox"/> 11 <input type="checkbox"/> 18 <input type="checkbox"/>	4	\$26,367 - \$31,793	\$29,296 - \$35,325	\$34,179 - \$41,213
5 <input type="checkbox"/> 12 <input type="checkbox"/> 19 <input type="checkbox"/>	5	\$31,794 - \$37,220	\$35,326 - \$41,355	\$41,214 - \$48,248
6 <input type="checkbox"/> 13 <input type="checkbox"/> 20 <input type="checkbox"/>	For each additional household member add	\$5,427	\$6,030	\$7,035
7 <input type="checkbox"/> 14 <input type="checkbox"/> 20 <input type="checkbox"/>				

PLEASE READ THE FOLLOWING IMPORTANT INFORMATION ABOUT THE LIFELINE PROGRAM BEFORE YOU SIGN BELOW:

- Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household. A household is defined for the purposes of the Lifeline program as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline assistance from multiple telephone service providers. This includes both wireless and wireline providers.
- Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in the subscriber's de-enrollment from the program and potentially prosecution by the US government;
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

EACH OF THE FOLLOWING CERTIFICATIONS MUST BE CHECK-MARKED IN ORDER TO RECEIVE LIFELINE. FAILURE TO CHECK ALL OF THE BOXES BELOW WILL RESULT IN REJECTION OF YOUR APPLICATION FORM.

I certify under penalty of perjury, that:

EACH LINE MUST BE CHECKMARKED

- I understand and consent to CenturyLink providing my Lifeline service account information, including but not limited to, my name, residential address, phone number, date of birth; the last 4 digits of my social security number; the date on which my Lifeline service was initiated/terminated, the amount of Lifeline support provided, and the means through which I qualified for Lifeline, to the Universal Service Administrative Company (USAC), USAC's agents and/or the National Lifeline Accountability Database to ensure the proper administration of the Lifeline program. I understand that if I fail to provide this consent, CenturyLink will deny me Lifeline service.
- I understand that if I am identified as receiving more than one Lifeline benefit, all telephone service providers involved may be notified so that I may select one service and be de-enrolled from the other(s).
- My household meets the program-based or income-based eligibility criteria indicated above.
- I must notify CenturyLink within 30 days if for any reason my household no longer satisfies the criteria for receiving Lifeline assistance. This includes if I no longer meet the income-based or program-based criteria for receiving Lifeline support, if I am receiving more than one Lifeline benefit, if another member of my household is receiving a Lifeline benefit, or for any other reason, my household no longer satisfies the criteria for receiving Lifeline support. Failure to notify CenturyLink may result in penalties and de-enrollment from the program.
- I must notify CenturyLink within 30 days if I move to a new address.
- Only one Lifeline service benefit is available per household. To the best of my knowledge, my household is only receiving one Lifeline service.
- I understand that my CenturyLink Lifeline service is not transferable. I may not transfer my service to any individual, including another eligible low-income consumer.
- I understand that providing false or fraudulent information to receive Lifeline assistance is punishable by law.
- I understand that I may be required to re-certify my household's eligibility for Lifeline assistance at any time, and if I fail to re-certify as to my continued eligibility, it will result in de-enrollment and the termination of my household's Lifeline assistance.
- The information contained in this form is true and correct to the best of my knowledge.

Date: _____

Lifeline Assistance Recipient Signature

(Must be the same name as on page one)

Please mail this completed recertification form to:
CenturyLink Lifeline Recertification
PO Box 211069
Denver, CO 80221

If you have questions call:
Call 866-771-0776

CenturyLink must receive your recertification by: June 03, 2013

If you live in one of the states listed below you may qualify for Lifeline assistance via one of the following state programs. Please completely fill in the circle next to the program(s).

<p>CA</p> <p><input type="checkbox"/> Medi-Cal</p> <p><input type="checkbox"/> CalWORKS</p> <p><input type="checkbox"/> StanWORKS</p> <p><input type="checkbox"/> WTW</p> <p><input type="checkbox"/> GAIN</p> <p><input type="checkbox"/> Healthy Families Category A</p> <p><input type="checkbox"/> Women, Infants & Children (WIC)</p>	<p>OH</p> <p><input type="checkbox"/> Ohio Energy Credit Program (OECF)</p> <p><input type="checkbox"/> SSDI</p> <p><input type="checkbox"/> Medical Assistance, including state programs that might supplant Medicaid</p> <p><input type="checkbox"/> Ohio Works First</p> <p><input type="checkbox"/> General Assistance including Disability Assistance (DA)</p> <p><input type="checkbox"/> HEAP and E-HEAP</p>
<p>FL</p> <p><input type="checkbox"/> Temporary Cash Assistance</p>	<p>WI</p> <p><input type="checkbox"/> WI Works</p> <p><input type="checkbox"/> Medical Assistance</p> <p><input type="checkbox"/> WI Homestead Tax Credit</p> <p><input type="checkbox"/> Badger Care</p>
<p>GA</p> <p><input type="checkbox"/> Senior Citizen Low-Income Discount Plan Offered by Local Gas or Power Company</p>	
<p>KS</p> <p><input type="checkbox"/> General Assistance</p> <p><input type="checkbox"/> Food Distribution Program</p>	
<p>MN</p> <p><input type="checkbox"/> Minnesota Family Investment Program (MFIP)</p>	<p>WY</p> <p><input type="checkbox"/> Child Care Assistance</p> <p><input type="checkbox"/> Personal Opportunities with Employment Responsibilities (POWER)</p> <p><input type="checkbox"/> Prescription Drug Assistance (formerly Minimum Medical Program)</p>
<p>MO</p> <p><input type="checkbox"/> MOHealthNet (f/k/a Medicaid)</p>	
<p>NJ</p> <p><input type="checkbox"/> Work First New Jersey</p> <p><input type="checkbox"/> General Assistance</p> <p><input type="checkbox"/> Pharmaceutical Assistance to the Aged and Disabled</p> <p><input type="checkbox"/> Lifeline Utility Credit / Tenants Lifeline Assistance</p>	



Postcard sent prior to 30 day Recertification Period

IMPORTANT INFORMATION FROM CENTURYLINK REGARDING YOUR LIFELINE ELIGIBILITY

The FCC Lifeline rules require annual verification of customer eligibility. Within the next two weeks, you will be receiving a request to confirm your continued eligibility. Please read the letter you receive completely and follow all instructions in order to maintain your current lifeline discounts.

You will be happy to know that in 2013 CenturyLink has made it easier to recertify your Lifeline discounts. You now have two options by which to recertify:

1. You can fill out and send back the paper form you will receive soon or
2. You can use the same form to guide you through an interactive telephone response system.

Please look for the Lifeline Recertification letter to be delivered soon. This letter will contain complete information and instructions on how to keep your monthly Lifeline discounts. The form will include the date by which CenturyLink must receive your response. This date will be 30 days from the date on the letter included with the lifeline form. If you do not respond by mail or by the telephone response system before the received by date on the form, your lifeline discounts will be discontinued.

For questions regarding your Lifeline discounts, please call the customer service number located on your monthly CenturyLink bill.

Thank you for choosing CenturyLink for your communication needs—we value you as a customer.

Postcard sent during 30 day Recertification Period

IMPORTANT INFORMATION FROM CENTURYLINK REGARDING YOUR LIFELINE ELIGIBILITY

CenturyLink recently mailed out your 2013 lifeline recertification form. It is important that you complete the recertification process by the date indicated on the letter.

In 2013 CenturyLink has made it easier to recertify your Lifeline discounts. You now have two options by which to recertify:

1. You can fill out and send back the paper form you will receive soon or
2. You can use the same form to guide you through an interactive telephone response system.

If you have questions on how to fill out the recertification form, you can find answers to frequently asked questions at www.centurylink.com/lifeline or you may call CenturyLink at the toll free number listed on the back of your form.

Thank you for choosing CenturyLink for your communication needs—we value you as a customer.

May 03, 2013



John Q. Sample
123 Anystreet
Anytown, US 12345-6789

ACT NOW TO KEEP YOUR LIFELINE DISCOUNT

Ref 123456789

Dear CenturyLink Lifeline Customer:

In accordance with the Federal Communications Commission's rules, all Lifeline providers are required to annually verify consumer's eligibility for Lifeline assistance. Thus, CenturyLink, your local telecommunications company, must verify that customers who receive Lifeline discounts are still eligible to receive this assistance.

In order for your Lifeline assistance to remain in effect, you must certify your Lifeline eligibility based on your income or benefits you receive from a qualifying federal or state aid program. A list of the qualifying aid programs is shown on the enclosed Lifeline recertification form. As a reminder, only one Lifeline discount is allowed per household¹. This applies to all phones in the household, including landline and wireless phones. Also, Lifeline is a federal benefit, and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.

If you qualify for Lifeline assistance under the Federal eligibility criteria listed on the first page of the attached recertification form, you need to either 1) complete this form entirely and return it to CenturyLink in the enclosed envelope or 2) call 866-609-3712 to complete the Recertification Survey over the phone. Please note that the phone option will require the Recertification PIN number located in the upper left corner of the application. The phone option will guide you through the process and allow you to correct errors. If your state has state specific programs and you qualify for Lifeline assistance under one of the state specific eligibility criteria listed on the third page please respond by completing, signing and returning the form to CenturyLink at the address shown on the form.

If the account information on the form is not correct, please contact us immediately at the toll free number located on the back of the recertification form so that we can make the necessary changes to your account. If you do not complete and return your paper form or complete the telephone survey as instructed, you will lose your lifeline benefit and be required to re-apply for Lifeline.

CenturyLink must receive your completed and signed recertification form or your completed response via the telephone survey by June 03, 2013 to continue to provide your Lifeline discount. If the form or completed telephone survey is not received by June 03, 2013 or your returned form is incorrect or incomplete, your Lifeline discounts will expire and be removed from your account. This will result in an increase in the amount you need to pay for your monthly phone bill.

If you have questions, please call us toll-free at the number listed on the recertification form.

Sincerely

CenturyLink Customer Service



Recertification Checklist – Please provide the following:

1. Signed and completed Lifeline Assistance Program – Recertification Form.
2. Make sure you have filled in the boxes and circles for the last four digits of the account holders Social Security number and Date of Birth.
3. Be sure to indicate the programs which program you currently participate by placing a check in the corresponding box. (Either Federal or State specific programs)

¹ A household is defined, for the purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses.

SAMPLE

LIFELINE ASSISTANCE PROGRAM – RECERTIFICATION FORM

Please Read All Instructions Carefully Before Completing

Please respond completely. Inaccurate or incomplete responses may cause your Lifeline benefits to be terminated. The information on this application will only be used to assess your continued eligibility for Lifeline Assistance.

If the account information on the form is not correct or the account holder identified below is deceased, please contact us immediately at the toll free number located on the back of this form so that we can correct your account.

The name on the account must be the same as the name on this lifeline recertification form. Please make necessary changes to the information, complete and return the form to the address listed on the back of this form.

Telephone Number 123-456-789	First Name John	Last Name Sample		
Service Address 123 Anystreet	City Anytown	State US	Zip code 12345	
<small>We classify this as your permanent address in our records. Check if you disagree <input type="checkbox"/></small>				

Fill in each area completely with either blue or black ink.

Write the last 4 digits of your social security number or Tribal ID.

X X X - X X - [] [] [] []

Please check if this is your Tribal ID:

Write your birth date. Single digit days and months are preceded with a zero. For example a birth date of May 1st 1950 is shown as 05 01 1950.

M M / D D / Y Y Y Y
[] [] / [] [] / [] [] [] []

PLEASE CHECK programs in which you or your household currently participates. (Additional State-specific programs in which you may be participating are listed on the last page):

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

If you are receiving Lifeline assistance because a member of your household besides you participates in one of these programs, provide his/her name and certify that he/she is a member of your household here:

Name of Participant (please print) _____

_____ (Please Initial) I certify that this program participant is a member of my household.

INCOME GUIDELINES (Documentation Required): If you do not participate in any of the programs above, but are receiving Lifeline Assistance because your annual household income is at or below the amounts shown below depending on the size of your household, PLEASE CHECK the corresponding box of your income-based eligibility. Please indicate the number of household members.

Check the box next to the Number of members in the household	All States Not Listed to the Right	KS, NM, Owyhee, NV & Mountain City, NV FL, MI, NJ (seniors 65 and older), OH, and TX	NV: All other Areas (excluding Owyhee & Mountain City)	
	Number in the Household	135% of Federal Poverty Level	150% of Federal Poverty Level	175% of Federal Poverty Level
1 <input type="checkbox"/> 8 <input type="checkbox"/> 15 <input type="checkbox"/>	1	\$ 0 - \$15,512	\$0 - \$17,235	\$0 - \$20,108
2 <input type="checkbox"/> 9 <input type="checkbox"/> 16 <input type="checkbox"/>	2	\$15,513 - \$20,939	\$17,235 - \$23,295	\$20,109 - \$27,143
3 <input type="checkbox"/> 10 <input type="checkbox"/> 17 <input type="checkbox"/>	3	\$20,940 - \$26,366	\$23,296 - \$29,295	\$27,143 - \$34,178
4 <input type="checkbox"/> 11 <input type="checkbox"/> 18 <input type="checkbox"/>	4	\$26,367 - \$31,793	\$29,296 - \$35,325	\$34,179 - \$41,213
5 <input type="checkbox"/> 12 <input type="checkbox"/> 19 <input type="checkbox"/>	5	\$31,794 - \$37,220	\$35,326 - \$41,355	\$41,214 - \$48,248
6 <input type="checkbox"/> 13 <input type="checkbox"/> 20 <input type="checkbox"/>	For each additional household member add	\$5,427	\$6,030	\$7,035
7 <input type="checkbox"/> 14 <input type="checkbox"/> 20 <input type="checkbox"/>				

PLEASE READ THE FOLLOWING IMPORTANT INFORMATION ABOUT THE LIFELINE PROGRAM BEFORE YOU SIGN BELOW:

- Lifeline is a federal benefit and willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program.
- Only one Lifeline service is available per household. A household is defined for the purposes of the Lifeline program as any individual or group of individuals who live together at the same address and share income and expenses.
- A household is not permitted to receive Lifeline assistance from multiple telephone service providers. This includes both wireless and wireline providers.
- Violation of the one-per-household limitation constitutes a violation of the Federal Communications Commission's rules and will result in the subscriber's de-enrollment from the program and potentially prosecution by the US government;
- Lifeline is a non-transferable benefit and the subscriber may not transfer his or her benefit to any other person.

EACH OF THE FOLLOWING CERTIFICATIONS MUST BE CHECK-MARKED IN ORDER TO RECEIVE LIFELINE. FAILURE TO CHECK ALL OF THE BOXES BELOW WILL RESULT IN REJECTION OF YOUR APPLICATION FORM.

I certify under penalty of perjury, that:

EACH LINE MUST BE CHECKMARKED

- I understand and consent to CenturyLink providing my Lifeline service account information, including but not limited to, my name, residential address, phone number, date of birth; the last 4 digits of my social security number; the date on which my Lifeline service was initiated/terminated, the amount of Lifeline support provided, and the means through which I qualified for Lifeline, to the Universal Service Administrative Company (USAC), USAC's agents and/or the National Lifeline Accountability Database to ensure the proper administration of the Lifeline program. I understand that if I fail to provide this consent, CenturyLink will deny me Lifeline service.
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- The information contained in this form is true and correct to the best of my knowledge.

Date: _____

Lifeline Assistance Recipient Signature

(Must be the same name as on page one)

Please mail this completed recertification form to:

CenturyLink Lifeline Recertification

PO Box 211069

Denver, CO 80221

If you have questions call:

Call 866-771-0776

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<p>MO</p> <p><input type="checkbox"/> MOHealthNet (f/k/a Medicaid)</p>	
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Postcard sent prior to 30 day Recertification Period

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