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March 26, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Attn: Wireline Competition Bureau
Kris Monteith, Chief

Re: Lifeline National Verifier
WC Docket No. 11-42

Madam Secretary:

On behalf of Smith Bagley, Inc. ("SBI"), we write to urge the Commission to delay the launch of the Lifeline National Verifier in Arizona until the Commission has secured access to the Supplemental Nutrition Assistance Program ("SNAP") and Medicaid program databases, two programs essential to verifying Tribal Lifeline consumers.

SBI is a mobile wireless provider and eligible telecommunications carrier ("ETC") that participates in the federal Connect America Fund, Low-Income, and Schools and Libraries universal service programs in Arizona, New Mexico and Utah. SBI is the leading facilities-based provider of wireless Lifeline in Tribal areas, serving more than 60,000 low-income households on the Navajo, Hopi, White Mountain Apache, Zuni, and Ramah Navajo Tribal lands.

Most Lifeline-eligible residents in these Tribal areas live in very challenging circumstances. These areas are sparsely populated, with vast stretches of land having fewer than five people per square mile. On the Navajo Nation, which SBI serves in its entirety, approximately 40 percent of residents are below the poverty line, the overall unemployment rate is over 19 percent, and for workers under 35 it is far higher.¹ Many areas lack road

¹ See U.S. Census Bureau, 2017 American Community Survey Estimate, Table DP03, enclosed as Exhibit A.

infrastructure,² while some lack running water and electricity.³ Tribal residents often must travel more than 50 miles to reach an SBI store. With no standard postal addressing system in place, many of SBI's customers on Tribal lands must travel significant distances to pick up their mail.⁴

Until 2012, residents of Tribal lands could self-certify as to their total household income or program participation in order to qualify for Tribal Lifeline benefits. Since 2012, ETCs have been required to confirm applicant eligibility for Lifeline by reviewing documents proving the applicant's household income or participation in a qualifying program. The two most popular qualifying programs are SNAP and Medicaid. Approximately 80% of SBI's Lifeline customers, or about 50,000, qualify by providing documents demonstrating participation in either SNAP or Medicaid.

Today, the Lifeline program is transitioning toward centralized eligibility determinations. In 2016, the Commission ordered the Wireline Competition Bureau and the Universal Service Administrative Company ("USAC") to create the National Verifier, a system that will take over the role of verifying consumer eligibility. In rolling out the National Verifier, the Commission has "soft launched" groups of states, to enable program participants to get acquainted with the systems. Once the system is running properly, the Commission does a "hard launch," after which all verifications are required to go through the National Verifier. Thus far, the National Verifier has hard-launched in 16 U.S. states and territories, including New Mexico and Utah, and has soft-launched in eleven more.⁵ The Commission set an expectation that the National Verifier would be fully launched nationwide by the end of 2019.⁶ No launch date has been announced for Arizona.

The soft launch of the National Verifier in a state is accompanied by "reverification," a process for reconfirming the eligibility of all current Lifeline customers. Under this process,

² "In Navajo Nation, Bad Roads Can Mean Life or Death," GOVERNING THE STATES AND LOCALITIES (July 2017), available at <http://www.governing.com/topics/transportation-infrastructure/gov-navajo-utah-roads-infrastructure.html>.

³ Alysa Landry, "Not Alone in the Dark: Navajo Nation's Lack of Electricity Problem," INDIAN COUNTRY TODAY (Feb. 11, 2015), accessed at <https://indiancountrymedianetwork.com/news/native-news/not-alone-in-the-dark-navajo-nations-lack-of-electricity-problem/>.

⁴ "Home addresses on Navajo Nation Are Rare, Officials Working to Change That," KJZZ (Oct. 8, 2015), available at <https://kjzz.org/content/202564/home-addresses-navajo-nation-are-rare-officials-working-change>.

⁵ See <https://www.usac.org/li/tools/national-verifier/launches/default.aspx>.

⁶ See *Lifeline and Link Up Reform and Modernization*, 31 FCC Rcd. 3962, 4020 (¶ 164) (2016).

USAC checks available databases (e.g., SNAP or Medicaid) to see if the customer participates in a qualifying program. If a customer does not appear in one of the available databases, reverification is done manually, based on a review of eligibility documents, such as a SNAP card, or proof of income as set forth in 47 C.F.R. §§ 54.410(b)(1)(i)(B) and 54.410(c)(1)(i)(B). For the more recently enrolled customers (based on customer groupings established by USAC for each launch wave), ETCs may provide documents they already have on file; however, those documents must meet USAC's acceptable documentation standards,⁷ which were substantially updated effective December 4, 2018.⁸

For longstanding customers, and for recent enrollees whose existing documents are deemed to be insufficient, the customer must reverify by producing fresh eligibility documents. USAC reaches out to customers for this purpose unless the ETC elects to handle outreach. Because of the challenging circumstances described above, SBI has opted to conduct the outreach process to minimize the chances of customers losing service due to, (i) an inability to promptly respond, (ii) not understanding the process, or (iii) a longstanding distrust of communications initiated by the United States federal government.

In order for the National Verifier to work, USAC must establish data-sharing agreements with the agencies administering benefit programs. For example, in New Mexico and Utah, USAC has established agreements with the states' agencies administering Medicaid and SNAP, in addition to the U.S. Department of Housing and Urban Development ("HUD"), which maintains the federal housing subsidy database. These agreements enable USAC to electronically "dip" into these databases when a customer applies for Lifeline benefits.

In 16 of the 27 states where the National Verifier has soft-launched, USAC has established access to only the HUD database.⁹ By far the most common qualifying programs are SNAP, Medicaid and Supplemental Security Income ("SSI"); only 0.6% qualify through HUD's federal housing subsidies.¹⁰ Another 7% qualify via household income.¹¹ Thus, having access to only HUD's database means that over 99% of all eligible consumers must produce documentation to qualify for, or remain in, the Lifeline program.

⁷ See <https://www.usac.org/li/tools/national-verifier/migration.aspx>.

⁸ See USAC email bulletin titled "National Verifier Update" (Nov. 28, 2018).

⁹ See <https://www.usac.org/li/tools/national-verifier/launches/default.aspx>.

¹⁰ See National Verifier Plan (January 2019) at slide #13, accessed at <https://www.usac.org/res/documents/li/pdf/nv/2019-January-National-Verifier-Plan.pdf>.

¹¹ See *id.*

Producing documentation is a significant burden on citizens and ETCs, and on Tribal lands it is a major barrier to obtaining Lifeline service. For many who live in outlying areas and only make weekly or monthly trips into town, providing documents means having to travel long distances to a store. Once the customer is in the store, it can take an hour or more of company staff time to review program documentation; match the documents against the customer's identification documents if there are TPIV issues; perform a separate Quality Control review to find and resolve errors; perform any necessary follow-up due to, for example, missing signatures or invalid documents; and then scan, merge, save, and complete the upload process to the National Verifier. If follow-up is needed, then it can be several more weeks before the customer can return to provide the necessary documents. Depending on the specifics of each case, SBI estimates that this process costs the company up to \$30 per customer, while the cost to eligible citizens can sometimes be days or weeks without phone service, as well as countless hours of delay and frustration.

To illustrate the importance of database access, when the National Verifier launched in 2018 in New Mexico and Utah, USAC verified approximately 75% of SBI's customers via the Medicaid, SNAP, and HUD databases. Accordingly, out of approximately 27,000 customers, approximately 7,000 had to be manually verified through documents. For a company with a very small local call center and one person leading SBI's compliance efforts, manually verifying 7,000 people represented an enormous undertaking, requiring the company to hire three full-time temporary workers to execute this manual process for seven months.

According to the updated National Verifier Plan released in January 2019, USAC is working to secure access to one or more databases in Arizona.¹² As of this date, it is unclear which databases USAC will be able to access in that state. If HUD is the only database that will be made available, a hard launch would be catastrophic for SBI and the vast majority of its Tribal Lifeline customers – people that SBI knows with certainty to be eligible for Lifeline benefits. Among SBI's existing Lifeline customer base of approximately 39,600 in Arizona, only one percent (1%) have qualified through participation in HUD-administered programs, while over 80% qualified under SNAP or Medicaid. Thus, if the HUD database is the sole available database, approximately 39,000 SBI customers will have to be reverified manually. Based on SBI's per-customer cost estimate above, the resulting document-gathering process could cost the company as much as \$1,200,000.

Without access to at least the SNAP and Medicaid databases, the shift to the National Verifier will present extraordinary burdens for SBI and its Lifeline customers in Arizona. When

¹² See *id.* at slide #10.

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customers are told their documents are in some way insufficient to verify their eligibility, some have difficulty affording the fuel it takes to drive long distances to return to an SBI store. Customers must sometimes go to a government office to obtain new documents. In SBI's recent experience, customers in these situations sometimes become irate and verbally abusive. They are frustrated with the number of times SBI has been required to ask them to produce proof of their eligibility, with each ask representing a significant burden to maintaining basic telephone connectivity.

For many, the burden is becoming a barrier to accessing affordable service. For the people least able to navigate this program, having SNAP and Medicaid databases available must be a prerequisite to launching the National Verifier in Arizona so that Lifeline-eligible citizens can be reverified electronically. Accordingly, SBI respectfully requests the Commission to take appropriate steps to ensure that USAC will have access to, at a minimum, the SNAP and Medicaid databases before soft-launching the National Verifier in Arizona, or commencing the reverification process for that state. If this minimum level of database access cannot be established, the National Verifier launch in Arizona must be delayed until it is.

Should you have any questions, please contact undersigned counsel directly.

Sincerely,



David A. LaFuria
Steven M. Chernoff
Counsel for Smith Bagley, Inc.

Enclosure

cc: Hon. Ajit Pai
Hon. Michael O'Rielly
Hon. Brendan Carr
Hon. Jessica Rosenworcel
Hon. Geoffrey Starks
Ryan Palmer, Esq.
Jodie Griffin, Esq.
Allison Jones, Esq.



ARIZON

NEW MEXICO

OKLAHOMA

ARKANSAS

TENNESSEE

NORTH CAROLINA

SOUTH CAROLINA

DP03

SELECTED ECONOMIC CHARACTERISTICS

2017 American Community Survey 1-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Technical Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities, and towns and estimates of housing units for states and counties.

Subject	Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT			
	Estimate	Margin of Error	Percent	Percent Margin of Error
EMPLOYMENT STATUS				
Population 16 years and over	133,023	+/-4,699	133,023	(X)
In labor force	59,688	+/-2,945	44.9%	+/-1.4
Civilian labor force	59,656	+/-2,947	44.8%	+/-1.4
Employed	50,076	+/-2,513	37.6%	+/-1.4
Unemployed	9,580	+/-1,190	7.2%	+/-0.8
Armed Forces	32	+/-45	0.0%	+/-0.1
Not in labor force	73,335	+/-3,050	55.1%	+/-1.4
Civilian labor force	59,656	+/-2,947	59,656	(X)
Unemployment Rate	(X)	(X)	16.1%	+/-1.7
Females 16 years and over				
Population 16 years and over	70,010	+/-2,656	70,010	(X)
In labor force	31,635	+/-1,755	45.2%	+/-1.8
Civilian labor force	31,635	+/-1,755	45.2%	+/-1.8
Employed	27,894	+/-1,652	39.8%	+/-1.9
Own children of the householder under 6 years				
Population	12,862	+/-1,318	12,862	(X)
All parents in family in labor force	6,947	+/-1,094	54.0%	+/-5.9
Own children of the householder 6 to 17 years				
Population	31,675	+/-2,182	31,675	(X)
All parents in family in labor force	18,293	+/-1,996	57.8%	+/-4.1
COMMUTING TO WORK				
Workers 16 years and over	49,271	+/-2,448	49,271	(X)
Car, truck, or van -- drove alone	37,757	+/-2,126	76.6%	+/-2.2
Car, truck, or van -- carpooled	4,329	+/-815	8.8%	+/-1.5
Public transportation (excluding taxicab)	319	+/-212	0.6%	+/-0.4
Walked	2,277	+/-667	4.6%	+/-1.3
Other means	1,456	+/-457	3.0%	+/-0.9
Worked at home	3,133	+/-530	6.4%	+/-1.1
Mean travel time to work (minutes)	31.8	+/-1.4	(X)	(X)

Subject	Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT			
	Estimate	Margin of Error	Percent	Percent Margin of Error
OCCUPATION				
Civilian employed population 16 years and over	50,076	+/-2,513	50,076	(X)
Management, business, science, and arts occupations	13,113	+/-1,378	26.2%	+/-2.4
Service occupations	13,663	+/-1,045	27.3%	+/-1.9
Sales and office occupations	9,673	+/-1,233	19.3%	+/-2.1
Natural resources, construction, and maintenance occupations	6,940	+/-911	13.9%	+/-1.6
Production, transportation, and material moving occupations	6,687	+/-829	13.4%	+/-1.5
INDUSTRY				
Civilian employed population 16 years and over	50,076	+/-2,513	50,076	(X)
Agriculture, forestry, fishing and hunting, and mining	1,332	+/-345	2.7%	+/-0.7
Construction	4,546	+/-728	9.1%	+/-1.2
Manufacturing	1,753	+/-438	3.5%	+/-0.9
Wholesale trade	554	+/-228	1.1%	+/-0.5
Retail trade	4,510	+/-739	9.0%	+/-1.4
Transportation and warehousing, and utilities	3,111	+/-583	6.2%	+/-1.1
Information	163	+/-131	0.3%	+/-0.3
Finance and insurance, and real estate and rental and leasing	1,017	+/-332	2.0%	+/-0.6
Professional, scientific, and management, and administrative and waste management services	1,677	+/-388	3.3%	+/-0.7
Educational services, and health care and social assistance	19,394	+/-1,596	38.7%	+/-2.6
Arts, entertainment, and recreation, and accommodation and food services	5,788	+/-896	11.6%	+/-1.8
Other services, except public administration	1,603	+/-439	3.2%	+/-0.9
Public administration	4,628	+/-656	9.2%	+/-1.3
CLASS OF WORKER				
Civilian employed population 16 years and over	50,076	+/-2,513	50,076	(X)
Private wage and salary workers	29,815	+/-2,085	59.5%	+/-2.5
Government workers	18,431	+/-1,452	36.8%	+/-2.4
Self-employed in own not incorporated business workers	1,785	+/-421	3.6%	+/-0.8
Unpaid family workers	45	+/-78	0.1%	+/-0.2
INCOME AND BENEFITS (IN 2017 INFLATION-ADJUSTED DOLLARS)				
Total households	49,038	+/-1,809	49,038	(X)
Less than \$10,000	11,666	+/-896	23.8%	+/-1.5
\$10,000 to \$14,999	4,177	+/-560	8.5%	+/-1.1
\$15,000 to \$24,999	7,456	+/-813	15.2%	+/-1.5
\$25,000 to \$34,999	5,579	+/-667	11.4%	+/-1.3
\$35,000 to \$49,999	6,543	+/-628	13.3%	+/-1.2
\$50,000 to \$74,999	6,387	+/-729	13.0%	+/-1.5
\$75,000 to \$99,999	3,480	+/-530	7.1%	+/-1.0
\$100,000 to \$149,999	2,413	+/-449	4.9%	+/-0.9
\$150,000 to \$199,999	747	+/-224	1.5%	+/-0.5
\$200,000 or more	590	+/-340	1.2%	+/-0.7
Median household income (dollars)	26,693	+/-1,417	(X)	(X)
Mean household income (dollars)	39,465	+/-1,952	(X)	(X)
With earnings				
Mean earnings (dollars)	48,746	+/-2,753	(X)	(X)
With Social Security				
Mean Social Security income (dollars)	13,125	+/-589	(X)	(X)
With retirement income				
Mean retirement income (dollars)	17,025	+/-1,695	(X)	(X)

Subject	Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT			
	Estimate	Margin of Error	Percent	Percent Margin of Error
With Supplemental Security Income	8,820	+/-838	18.0%	+/-1.7
Mean Supplemental Security Income (dollars)	8,467	+/-396	(X)	(X)
With cash public assistance income	1,635	+/-432	3.3%	+/-0.9
Mean cash public assistance income (dollars)	3,452	+/-594	(X)	(X)
With Food Stamp/SNAP benefits in the past 12 months	15,294	+/-1,147	31.2%	+/-2.0
Families	33,587	+/-1,424	33,587	(X)
Less than \$10,000	5,099	+/-604	15.2%	+/-1.5
\$10,000 to \$14,999	2,484	+/-433	7.4%	+/-1.2
\$15,000 to \$24,999	5,468	+/-580	16.3%	+/-1.6
\$25,000 to \$34,999	4,134	+/-526	12.3%	+/-1.5
\$35,000 to \$49,999	5,135	+/-550	15.3%	+/-1.5
\$50,000 to \$74,999	4,929	+/-553	14.7%	+/-1.6
\$75,000 to \$99,999	2,963	+/-464	8.8%	+/-1.3
\$100,000 to \$149,999	2,107	+/-439	6.3%	+/-1.3
\$150,000 to \$199,999	738	+/-223	2.2%	+/-0.7
\$200,000 or more	530	+/-332	1.6%	+/-1.0
Median family income (dollars)	33,663	+/-2,378	(X)	(X)
Mean family income (dollars)	46,297	+/-2,476	(X)	(X)
Per capita income (dollars)	12,805	+/-626	(X)	(X)
Nonfamily households	15,451	+/-1,056	15,451	(X)
Median nonfamily income (dollars)	11,165	+/-1,212	(X)	(X)
Mean nonfamily income (dollars)	20,819	+/-1,850	(X)	(X)
Median earnings for workers (dollars)	24,107	+/-1,306	(X)	(X)
Median earnings for male full-time, year-round workers (dollars)	34,609	+/-2,436	(X)	(X)
Median earnings for female full-time, year-round workers (dollars)	30,968	+/-1,309	(X)	(X)
HEALTH INSURANCE COVERAGE				
Civilian noninstitutionalized population	176,183	+/-6,262	176,183	(X)
With health insurance coverage	137,183	+/-5,365	77.9%	+/-1.5
With private health insurance	41,897	+/-3,245	23.8%	+/-1.7
With public coverage	102,138	+/-5,037	58.0%	+/-1.9
No health insurance coverage	39,000	+/-3,049	22.1%	+/-1.5
Civilian noninstitutionalized population under 19 years	52,989	+/-3,066	52,989	(X)
No health insurance coverage	9,030	+/-1,392	17.0%	+/-2.3
Civilian noninstitutionalized population 19 to 64 years	101,396	+/-4,003	101,396	(X)
In labor force:	56,775	+/-2,894	56,775	(X)
Employed:	47,518	+/-2,499	47,518	(X)
With health insurance coverage	34,732	+/-2,041	73.1%	+/-2.4
With private health insurance	22,069	+/-1,751	46.4%	+/-2.6
With public coverage	13,874	+/-1,311	29.2%	+/-2.6
No health insurance coverage	12,786	+/-1,384	26.9%	+/-2.4
Unemployed:	9,257	+/-1,172	9,257	(X)
With health insurance coverage	6,269	+/-840	67.7%	+/-5.0
With private health insurance	839	+/-338	9.1%	+/-3.4
With public coverage	5,567	+/-777	60.1%	+/-5.5
No health insurance coverage	2,988	+/-648	32.3%	+/-5.0
Not in labor force:	44,621	+/-2,509	44,621	(X)
With health insurance coverage	31,293	+/-2,068	70.1%	+/-2.5
With private health insurance	4,942	+/-912	11.1%	+/-1.9

Subject	Navajo Nation Reservation and Off-Reservation Trust Land, AZ--NM--UT			
	Estimate	Margin of Error	Percent	Percent Margin of Error
With public coverage	27,329	+/-1,859	61.2%	+/-2.6
No health insurance coverage	13,328	+/-1,357	29.9%	+/-2.5
PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL				
All families	(X)	(X)	33.2%	+/-2.0
With related children of the householder under 18 years	(X)	(X)	42.4%	+/-3.2
With related children of the householder under 5 years only	(X)	(X)	35.5%	+/-11.4
Married couple families	(X)	(X)	23.7%	+/-2.7
With related children of the householder under 18 years	(X)	(X)	31.2%	+/-4.9
With related children of the householder under 5 years only	(X)	(X)	29.5%	+/-16.8
Families with female householder, no husband present	(X)	(X)	41.9%	+/-2.8
With related children of the householder under 18 years	(X)	(X)	52.3%	+/-4.0
With related children of the householder under 5 years only	(X)	(X)	39.1%	+/-16.3
All people	(X)	(X)	38.6%	+/-2.0
Under 18 years	(X)	(X)	47.3%	+/-3.7
Related children of the householder under 18 years	(X)	(X)	47.2%	+/-3.8
Related children of the householder under 5 years	(X)	(X)	49.8%	+/-5.1
Related children of the householder 5 to 17 years	(X)	(X)	46.4%	+/-3.9
18 years and over	(X)	(X)	35.2%	+/-1.8
18 to 64 years	(X)	(X)	36.1%	+/-2.1
65 years and over	(X)	(X)	30.5%	+/-2.7
People in families	(X)	(X)	36.0%	+/-2.3
Unrelated individuals 15 years and over	(X)	(X)	56.6%	+/-3.0

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Employment and unemployment estimates may vary from the official labor force data released by the Bureau of Labor Statistics because of differences in survey design and data collection. For guidance on differences in employment and unemployment estimates from different sources go to Labor Force Guidance.

Workers include members of the Armed Forces and civilians who were at work last week.

Industry codes are 4-digit codes and are based on the North American Industry Classification System 2012. The Industry categories adhere to the guidelines issued in Clarification Memorandum No. 2, "NAICS Alternate Aggregation Structure for Use By U.S. Statistical Agencies," issued by the Office of Management and Budget.

Occupation codes are 4-digit codes and are based on Standard Occupational Classification 2010.

Logical coverage edits applying a rules-based assignment of Medicaid, Medicare and military health coverage were added as of 2009 -- please see https://www.census.gov/library/working-papers/2010/demo/coverage_edits_final.html for more details. The 2008 data table in American FactFinder does not incorporate these edits. Therefore, the estimates that appear in these tables are not comparable to the estimates in the 2009 and later tables. Select geographies of 2008 data comparable to the 2009 and later tables are available at <https://www.census.gov/data/tables/time-series/acs/1-year-re-run-health-insurance.html>. The health insurance coverage category names were modified in 2010. See https://www.census.gov/topics/health/health-insurance/about/glossary.html#par_textimage_18 for a list of the insurance type definitions.

Beginning in 2017, selected variable categories were updated, including age-categories, income-to-poverty ratio (IPR) categories, and

the age universe for certain employment and education variables. See user note entitled "Health Insurance Table Updates" for further details.

While the 2017 American Community Survey (ACS) data generally reflect the July 2015 Office of Management and Budget (OMB) delineations of metropolitan and micropolitan statistical areas, in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB delineations due to differences in the effective dates of the geographic entities.

Estimates of urban and rural populations, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates

Explanation of Symbols:

1. An '***' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '****' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.