****

Dear Ms. Dortch:

On October 4, Phil Anderson of Navigators Global and I met with Nick Degani and Nirali Patel.  We discussed three topics:

1. The importance of the Wireline Competition Bureau granting the CTIA Petition on Minimum Services Standards.  WC Docket No. 11-42 et al. (filed June 27, 2019)(Joint Petition). ​TracFone highlighted (consistent with prior advocacy) how untenable providing more than 2GB of data at the current $9.25 per month subsidy level would be for TracFone if a no-cost Lifeline offering is to be maintained, how TracFone customers will not pay a fee to offset the costs of meeting the new minimum service standard because few, if any, Lifeline-eligible customers will remain in the program if a co-pay is imposed; and how, as a result, TracFone will be forced to discontinue its no charge Lifeline broadband services on December 1, 2019, affecting the vast majority of existing customers. All commenters representing the broadest coalition possible – without dissent – have supported the “pause and study” approach espoused in the Joint Petition. To avoid unnecessary costs and consumer confusion regarding plan changes, TracFone respectfully requests action on the CTIA Petition, as soon as possible, but not later than October 31, 2019.

We did not discuss, but in light of the recent D.C. Circuit of Appeals decision, *Mozilla et al vs. the FCC,* (to uphold the repeal of net neutrality rules but remanding to the FCC the question of whether it retains the authority to subsidize broadband services as an information service through the Lifeline program), TracFone urges the Commission not to implement the subsidy reduction for voice-only Lifeline support from $9.25 to $7.25 on December 1, 2019. If the Commission embarks on the path of eliminating Lifeline support for voice-only services, and the court eventually finds that the Lifeline program can no longer subsidize broadband as an information service, then the Commission will have effectively eliminated the entire no charge Lifeline program. TracFone therefore urges the Commission to preserve the status quo by suspending the phased elimination of voice-only Lifeline subsidies scheduled to commence on December 1st, 2019, unless and until the Commission’s legal authority in the broadband reclassification context has been fully resolved.

1. TracFone discussed the importance of the FCC/USAC National Verifier being connected to as many state SNAP data bases as possible prior to hard launches of the Verifier.  We acknowledged the importance of the recent connection to the CMS Data Base but TracFone also warned about the large number of otherwise eligible subscribers being deemed ineligible if the verifier does not have access to the state's SNAP databases. We encouraged the consideration of not hard launching in those states where connections to the SNAP data base have not been made.
2. We sought a status update on TracFone's Tribal Lifeline petition. TracFone Wireless, Inc.’s Second Amendment to Petition to Expand Eligible Telecommunications Carrier Designation to Include Tribal Lands and Motion for Expedited Action, WC Docket No. 09-197, (filed Feb. 28, 2019), [https://www.fcc.gov/ecfs/filing/10228830200523.](https://www.fcc.gov/ecfs/filing/10228830200523)  ​

Sincerely,

/s/

Mark Rubin

Senior Executive for Government Affairs

TracFone Wireless

202-591-5981

