

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

|                                 |   |                     |
|---------------------------------|---|---------------------|
| In the Matter of                | ) |                     |
|                                 | ) |                     |
| Lifeline and Link Up Reform and | ) | WC Docket No. 11-42 |
| Modernization                   | ) |                     |

**REPLY COMMENTS  
OF  
SPRINT CORPORATION**

Sprint Corporation (“Sprint”), on behalf of its Assurance Wireless affiliate, hereby respectfully replies to comments on Sprint’s petition for reconsideration of a provision included in the *California Waiver Extension Order*<sup>1</sup> which holds ETCs responsible for eligibility determinations of California Lifeline applicants and for recertification of Lifeline subscribers in the event that the California PUC is unable to comply with federal eligibility rules by April 30, 2018. Comments in support of Sprint’s petition for reconsideration were filed by a coalition of Lifeline service providers which included Telrite, i-wireless, Boomerang Wireless, AmeriMex Communications and TruConnect Communications (collectively, “the Lifeline Coalition”), on January 8, 2018.

The Lifeline Coalition agreed with Sprint that ETCs should not be responsible for making eligibility determinations for California Lifeline applicants if California is not prepared to do so by April 30.<sup>2</sup> Like Sprint, Lifeline Coalition members would be forced to invest considerable time and resources to cobble together a system to perform the

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<sup>1</sup> *Lifeline and Link Up Reform and Modernization, Order* released October 25, 2017 (DA 17-1047) in WC Docket No. 11-42. Significantly, the FCC included this same requirement in orders addressing waiver requests filed by New York and Michigan.

<sup>2</sup> Lifeline Coalition Comments, p. 1.

eligibility determinations currently made by the California Lifeline Administrator – investments which may turn out to be wasted if California is able to come into compliance with Federal requirements by April 30, but which ETCs cannot put off if they are to be in compliance with FCC requirements in the event that California in fact misses the April 30 deadline.<sup>3</sup>

Rather than having these functions performed by the National Verifier, as Sprint had suggested, the Lifeline Coalition instead recommended that the Commission continue to work closely with California and “grant additional short-term waivers” if necessary.<sup>4</sup> Sprint agrees that this is a simpler, more cost-effective approach. Commission grant of some additional time, if good cause exists, is sound policy. Sprint does not believe that this approach would be viewed by any party as *carte blanche* for open-ended delay, and it is our understanding that California is proceeding in good faith to meet its regulatory obligations.

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<sup>3</sup> *Id.*, pp. 3-4.

<sup>4</sup> *Id.*, p. 2.

Respectfully submitted,

**SPRINT CORPORATION**

*/s/ Charles W. McKee*

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