



February 11, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **Ex Parte Presentation**, Bridging the Digital Divide for Low-Income Consumers, WC Docket No. 17-287, Lifeline and Link Up Reform and Modernization WC Docket No. 11-42

Dear Ms. Dortch,

On February 7, 2019, Matthew Gerst of CTIA and outside counsel L. Charles Keller of Wilkinson Barker Knauer LLP along with representatives from CTIA's member companies Sprint and Tracfone met with staff from the Commission's Wireline Competition Bureau and the Universal Service Administrative Company (USAC) to discuss the implementation of the National Lifeline Eligibility Verifier (NLEV). A complete list of attendees is attached as an appendix to this letter.

During the meeting, CTIA expressed support for the Commission's goal of closing the digital divide, particularly through the use of mobile wireless technologies. In pursuit of this goal, CTIA reiterated a commitment to working with the Commission and the Universal Service Administrative Company (USAC) to strengthen the administration of the Lifeline program, which makes these essential communications services more affordable for millions of low-income consumers.

As long-time supporters of the NLEV, CTIA discussed its implementation, including opportunities for deployment of an Application Program Interface (API) that can both enable efficient verification for eligible low-income consumers and safeguard program integrity. Specifically, CTIA and its member companies discussed the benefits of incorporating APIs



between the NLEV and Lifeline providers' websites in order to minimize duplicative burdens on eligible low-income consumers.¹ CTIA's member companies also encouraged the Commission and USAC to seek technical feedback from Lifeline providers on the implementation of an NLEV API to ensure this capability can both enable efficient verification for eligible low-income consumers and safeguard program integrity.

CTIA also discussed concerns that have been raised about new documentation requirements for verifying the eligibility of low-income consumers to participate in Lifeline, consistent with its comments filed in response to the recent petitions from Lifeline providers.² Further, CTIA encouraged the Commission to act on its Petition for Reconsideration of the *2016 Lifeline Third Report and Order* by adopting a more economically justifiable long-term minimum service standard for mobile broadband data usage allowances before the new standards take effect in December 2019.³

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and provided to the Commission participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Matthew Gerst

Matthew Gerst
Vice President, Regulatory Affairs

cc: FCC & USAC attendees (see appendix)

¹ See, e.g., Comments of CTIA, WC Docket Nos. 17-287, 11-42, and 09-197 (filed Dec. 18, 2018).

² *Id.* at 2-4.

³ Petition for Reconsideration of CTIA, WC Docket Nos. 11-42, 09-197, 10-90 (filed June 23, 2016); see also, *Petitions for Reconsideration of Action in Lifeline Rulemaking Proceeding*, Public Notice, WC Docket Nos. 11-42, 09-197, 10-90, Report No. 3046 (rel. June 30, 2016).



Appendix
Meeting Attendees
February 7, 2018

Trent Harkrader	FCC/WCB
Ryan Palmer	FCC/WCB
Jodie Griffin	FCC/WCB
Allison Baker	FCC/WCB
Christine Caliosa	FCC/IT
Kumar Chandran	FCC/IT
Michelle Garber	USAC
Joseph Ho	USAC
Davon Nasir	USAC
Matthew Gerst	CTIA
L. Charles Keller	Wilkinson Barker Knauer LLP
Norina Moy	Sprint
Grace Boehm	Sprint/Assurance Wireless
Mark Rubin	TracFone Wireless
Gina Jasman	TracFone Wireless (via teleconference)
David Avila	TracFone Wireless (via teleconference)
Steven Athanson	TracFone Wireless (via teleconference)