



March 25, 2019

Via Electronic Submission

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

Re: 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; Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197

Dear Ms. Dortch:

On March 22, 2019, Charles McKee, Grace Boehm, and I of Sprint met with Trent Harkrader, Jodie Griffin, Allison Jones, and Allison Baker of the Wireline Competition Bureau regarding proposals to increase the reverification rate of subscribers during the National Lifeline Eligibility Verifier ("NV") deployment process.

Sprint discussed five proposals designed to increase reverification rates:

- Defer de-enrollments and maintain soft launch status for the NV until USAC has automated access to SNAP and Medicaid databases. The vast majority of end users demonstrate Lifeline eligibility based on their participation in SNAP or Medicaid, and automated reverification is substantially more effective than manual reverification which requires affirmative action on the part of the subscriber;
- Refine database search criteria – in checking program databases to determine eligibility, the initial search should be based on subscriber's date of birth and last 4 digits of Social Security number, subsequently using "fuzzy logic" to match names to the extent necessary;
- Provision of reverification failure cause reports by USAC to service providers to enable service providers to improve reverification outreach efforts;
- Apply eligibility criteria consistently and transparently – criteria used to determine eligibility should be announced publicly, with any changes announced with reasonable advance notice so that their impact can be evaluated and accommodated; new criteria cannot be applied retroactively;
- The Commission should consider temporarily suspending annual recertification in the remaining states in which the NV has not yet been deployed, since Lifeline customers in those states will be subject to reverification only weeks or months later.

Each of these proposals was discussed in greater detail in an *ex parte* letter filed by Sprint on March 18, 2019, in the above-referenced dockets.

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Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433-4503.

Sincerely,

/s/ Norina T. Moy

Norina T. Moy
Director, Government Affairs

Cc: Trent Harkrader
Jodie Griffin
Allison Jones
Allison Baker