



June 4, 2018

**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 June 1, 2018, Charles McKee and I of Sprint Corporation ("Sprint") met with Trent Harkrader, Jodie Griffin, Ryan Palmer, Jessica Campbell, Allison Baker, Rashann Duvall, Allison Jones, Nathan Eagan and Michelle Schaeffer (via telephone) of the Wireline Competition Bureau regarding the Lifeline reform proposals pending before the Commission in the above-captioned proceedings.

The discussion focused primarily on the proposal to restrict program participation to facilities-based service providers, and its impact on low income Lifeline subscribers; on Sprint (as a retail Lifeline service provider as well as a network service provider to MVNOs); on non-facilities based Lifeline service providers; and on NLAD's operations. Sprint emphasized that if the Commission were to adopt the proposal to require that Lifeline providers be facilities-based, the Commission must carefully define "facilities based" (use of backhaul, access, roaming, or intermediate provider services does not disqualify a service provider from being facilities-based), and must include a reasonable transition period.

Sprint also explained why the Lifeline benefit should not be contingent upon network deployment; why a minimum monthly usage fee on Lifeline customers is harmful to these low income Americans; and why a self-enforcing cap on the Lifeline program is contrary to the public interest. Finally, Sprint and the Bureau discussed the timing of the release by USAC of the maps and data to be used to help determine eligibility for enhanced support on Tribal lands. All positions expressed by Sprint were consistent with its advocacy in its prior written filings.

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.

Ms. Marlene H. Dortch, Secretary  
June 4, 2018  
Page 2

Sincerely,

*/s/ Norina T. Moy*

Norina T. Moy  
Director, Government Affairs

c: Trent Harkrader  
Jodie Griffin  
Ryan Palmer  
Jessica Campbell  
Allison Baker  
Rashann Duvall  
Allison Jones  
Nathan Eagan  
Michelle Schaeffer