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June 21, 2018

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VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: ***Ex Parte* Presentation: Bridging the Digital Divide for Low-Income Consumers**, WC Docket No. 17-287

Dear Ms. Dortch:

On June 19, 2018, Mark Rubin, Stephen Athanson, and David Avila of TracFone Wireless, and I, on behalf of TracFone Wireless, met with Allison Jones, Rashann Duvall, Nathan Eagan, Michelle Schaefer, Allison Baker, Jessica Campbell, and Trent Harkrader of the Wireline Competition Bureau regarding the above-captioned proceeding. TracFone representatives discussed the roadmap that was outlined in TracFone's reply comments¹ to the most recent Lifeline reform Notice of Proposed Rulemaking (NPRM).² The roadmap laid out the steps TracFone believes the Commission should undertake to strengthen Lifeline's program integrity while enabling it to meet the telecommunications needs of low-income Americans. Specifically, TracFone highlighted its proposal for a "conduct-based standard" in lieu of the Commission's proposal to exclude wireless resellers. The proposed standard utilizes the results of the Universal Service Administrative Company's (USAC) existing Payment Quality Assurance (PAQ) Program, the Beneficiary and Contributor Audit Program (BCAP), and the In-Depth Data Validation (IDV) mechanism to construct a set of objective, technology and business-model neutral criteria to root out waste, fraud, and abuse in the program. Rather than excluding Lifeline resellers from the program due to its non-facilities-

¹ Reply Comments of TracFone Wireless, Inc., WC Docket No. 17-287, et. al., at 22-23 (filed Mar. 23, 2018).

² *Bridging the Digital Divide for Low-Income Consumers*, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 17-155, 2017 WL 6015800 (Dec. 1, 2017).



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based status, the Commission should instead focus on the actual conduct of Lifeline carriers and target those that have performed poorly under the various audit and evaluation mechanisms intended to safeguard the Lifeline program.

Furthermore, while TracFone is pleased that the soft launch of the National Verifier had finally commenced earlier this week, it remains concerned about the lack of any application programming interface (API) for the National Verifier that would enable carriers and its social services and health care partners to assist consumers with navigating the National Verifier eligibility verification and application processes in ways other than through an in-person agent. While consumers will have the ability to access an online portal for eligibility verification, carriers do not have access to the necessary API to construct its own portals to assist the consumer throughout the application and eligibility verification processes. Without such tools, Lifeline carriers will also be disincentivized to market Lifeline products and services and educate consumers about the availability of such services, thus depressing overall Lifeline participation.

Finally, TracFone expressed its concerns about how the length of the actual Lifeline application – now stands at 8 pages long – could create additional burden on consumers seeking to apply for and receive Lifeline services, thus depressing enrollment.

Please contact me if you have any additional questions or concerns.



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Respectfully Submitted,

/s/ Shawn H. Chang

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Counsel to TracFone Wireless, Inc.

Cc: Allison Jones
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