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July 12, 2018

By ECFS

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

Re: **National Lifeline Association Written *Ex Parte* Presentation, WC
Docket Nos. 17-287, 11-42 and 09-197**

Dear Ms. Dortch:

On July 5, 2018, Q Link Wireless, LLC (Q Link) filed an Emergency Petition for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier.¹ Q Link correctly explained the problems with failing to include an application programming interface (API) for service providers to communicate with the National Verifier as they currently do with the National Lifeline Accountability Database (NLAD) and the detrimental impacts particularly on rural consumers and those seeking to enroll in the Lifeline program online. The National Lifeline Association (NaLA)² supports the Q Link Petition because the Commission's and USAC's failure to include a service provide API in the National Verifier would have a severely negative impact on all

¹ See Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier, WC Docket Nos. 17-287, 11-42, 09-197 (filed July 5, 2018) (Q Link Petition).

² NaLA is the only industry trade group specifically focused on the Lifeline segment of the communications marketplace. It supports eligible telecommunications carriers (ETCs), distributors, and Lifeline supporters and engages with regulators to improve the program through education, cooperation and advocacy. Its members include several of the largest wireless ETCs, including Q Link.

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Lifeline service provider business models (including in-person enrollments)³ and eligible low-income Americans.

NaLA and its members that constituted the Lifeline Connects Coalition, in concert with nearly all Lifeline service providers, have long advocated for a service provider API in the National Verifier.⁴ A service provider API enhances the efficiency of the National Verifier and is essential to providing a secure and efficient means of assisting millions of eligible consumers regardless of their geographic location with Lifeline enrollment whether online or in-person. The Commission must promptly restore a service provider API to the National Verifier Plan so that it is available upon hard launch of the National Verifier.

With respect to the management of the Lifeline program as currently constituted, nearly all stakeholders agree that there is nothing more important than the implementation of a successful and efficient National Verifier. In addition to supporting broadband services, the National Verifier was the primary reform to the Lifeline program adopted in the 2016 Lifeline Modernization Order and supported by all five commissioners. Unfortunately, by reversing course and removing a service provider API from the National Verifier Plan, USAC and the Commission have set the National Verifier, and therefore, the Lifeline program, up for failure.

Failure to provide an API would impose unnecessary burdens on consumers, service providers and the National Verifier administration. Without a service provider API, consumers will be forced to go to an online portal to demonstrate eligibility, and then separately go to a Lifeline service provider to enroll for Lifeline service. This more difficult two-step process will disconnect millions of Americans from the enrollment process and expose others to data security risks, including phishing scams as described in the Q Link Petition.⁵ In addition, the National Verifier would unnecessarily take on tens of millions of dollars in applicant screening and associated transaction costs that are currently shouldered by the service providers when they screen applicants as part of the intake process. That process includes things like getting readable

³ Implementation of a service provider API should apply for all enrollments whether online, over the phone/IVR or in-person.

⁴ See e.g., Comments of the National Lifeline Association, WC Docket Nos. 17-287, 11-42, 09-197 at 77-79 (filed Feb. 21, 2018); Reply Comments of the National Lifeline Association, WC Docket Nos. 17-287, 11-42, 09-197 at 27 (filed Mar. 23, 2018); Lifeline Connects Coalition Notice of Oral *Ex Parte* Presentation; WC Docket Nos. 11-42, 09-197, 10-90 at 4-7 (filed Sept. 11, 2017) (Lifeline Connects API *Ex Parte*).

⁵ Q Link Petition at 20-21.

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and appropriate documentation. The National Verifier cannot effectively and efficiently serve consumers and the Lifeline program without a service provider API.

As discussed in the Q Link Petition, the NLAD has operated since 2014 with a service provider API so that service providers can screen applications, obtain proper documentation and assist consumers to efficiently submit Lifeline enrollments. Likewise, the 2016 Lifeline Modernization Order contemplated a service provider API for the National Verifier⁶ and therefore the original USAC National Verifier Plan included a service provider API.⁷ However, by August 2017, it appears that USAC was directed to remove the service provider API from an updated National Verifier plan.⁸ This decision came with no reasoned explanation, no transparency and no accountability. Despite multiple meetings, *ex parte* letters and inquiries to Commission and USAC staff by NaLA, Q Link, TracFone and others, to date still no reasoned explanation has been provided for the decision to reverse course and remove the service provider API from the National Verifier plan.

Fortunately, it is not too late for the Commission to implement this common-sense solution to facilitate an efficient National Verifier enrollment process. A service provider API is simple, secure and cost effective. A service provider API does not introduce any new security risks or Federal Information Security Management Act (FISMA) compliance concerns because the NLAD, which has been used by service providers for more than four years and will be integrated with the National Verifier, already includes service provider APIs. Finally, utilizing the existing applicant screening processes will likely reduce USAC transactions and associated costs (including customer service inquiries) by more than 50 percent. Therefore, the Commission and USAC should be transparent about their concerns and work with Lifeline service providers to implement a successful, effective and efficient National Verifier.

⁶ See Lifeline Connects API *Ex Parte* at 4 (citing *Lifeline and Link Up Reform and Modernization et al.*, WC Docket Nos. 1-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-38, ¶ 138, n. 390 (2016)).

⁷ See Lifeline Connects API *Ex Parte* at 5 (citing Lifeline National Verifier Plan at 31, 33, 51, 52, 67 and 110 (Jan. 2017)).

⁸ See Lifeline National Verifier Plan at 34, 36, 37 (July 2017).

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Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



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