**Before the**
**Federal Communications Commission**
**Washington, D.C. 20554**

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| In the Matter of | **)** | |
| Bridging the Digital Divide for Low- | **)** | WC Docket No. 17-287 |
| Income Consumers, Lifeline and Link Up | **)** | |
| Reform and Modernization | **)** | |
| | **)** | |
| Lifeline and Link Up Reform and | **)** | WC Docket No. 11-42 |
| Modernization | **)** | |
| | **)** | |
| Telecommunications Carriers | **)** | WC Docket No. 09-197 |
| Eligible for Universal Service | **)** | |
| Support | **)** | |
| | **)** | |

**NATIONAL LIFELINE ASSOCIATION COMMENTS ON 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**

The National Lifeline Association[1] (NaLA) respectfully submits these comments in response

to the 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 (Q

Link Petition) filed on July 5, 2018.[2]  Q Link correctly explained the problems with failing to

include an application programming interface (API) for service providers to communicate with the

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[1]  NaLA is the only industry trade group specifically focused on the Lifeline segment of the communications marketplace.  It supports eligible telecommunications carriers (ETCs), distributors, Lifeline supporters and participants and partners with regulators to improve the program through education, cooperation and advocacy.  *See* https://www.nalalifeline.org/.

[2]  *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); *Wireline Competition Bureau Seeks Comment on 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, Public Notice, DA 18-718 (rel. July 11, 2018) (Public Notice).  NaLA previously expressed its support for the Q Link Petition in an *ex parte* letter filed with the Commission on July 12, 2018.  *See* Letter from John J. Heitmann, Counsel to the National Lifeline Association, to Marlene Dortch, Secretary, FCC, WC Docket Nos. 17-287, 11-42, 09-197 (filed July 12, 2018).

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.  NaLA supports the Q Link Petition because the Commission's and USAC's failure to include a service provider API in the National Verifier would have a severely negative impact on all Lifeline service provider business models (including in-person enrollments)[3] and eligible low-income Americans.  For the reasons explained herein, the Commission should promptly grant the Q Link Petition.

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

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[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*).

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 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 Verifier[6] 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

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[5] Q Link Petition at 20-21.

[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)).

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 that includes a service provider API.

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[8]  *See* Lifeline National Verifier Plan at 34, 36, 37 (July 2017).  The most recent version of the National Verifier plan, released in July 2018, expressly states "there is no API available associated with the NV Web Portal."  Lifeline National Verifier Plan at 72 (July 2018).

NaLA respectfully urges the Commission to grant the Q Link Petition and direct USAC to implement a service provider API into the National Verifier.

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Respectfully submitted,

By: _____
John J. Heitmann
Joshua Guyan
Jennifer Wainwright
**KELLEY DRYE & WARREN LLP**
3050 K Street NW, Suite 400
Washington, D.C. 20007
(202) 342-8400 (voice)
(202) 342-8451 (facsimile)
jheitmann@kelleydrye.com

*Counsel for the National Lifeline Association*

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