



August 11, 2017

Via Electronic Submission

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

**Re: Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42
Connect America Fund, WC Docket No. 10-90**

Dear Ms. Dortch:

On August 10, 2017, Charles McKee, Grace Boehm (via telephone) and I of Sprint Corporation ("Sprint") met with Ryan Palmer, Jodie Griffin, and Rashann Duvall of the Wireline Competition Bureau to discuss a USAC proposal which would require the submission of eligibility documentation collected after July 2017 for Lifeline subscribers enrolled prior to July 1, 2017 and not found in an eligibility database when their enrollment was attempted in the National Verifier.

Sprint explained that the number of Lifeline subscribers not found in a database (and who therefore would be required under the USAC proposal to submit new eligibility documentation) is likely to be significant for several reasons:

- USAC may not be able to secure agreements to access all necessary state eligibility databases;
- It is unclear whether the eligibility databases to which USAC does obtain access will have information about participation in all Lifeline-qualifying programs (*e.g.*, a SNAP database probably would not have information on Medicaid enrollment);
- There is no database of which Sprint is aware that would have information about consumers who qualify for Lifeline based on their income level;
- Exact matches between database records and Lifeline subscriber records may not be found because of typographical errors or variations in names (*e.g.*, nicknames, initials, name changes due to changes in marital status).

Any proposal which requires affirmative action by a Lifeline subscriber will be confusing and/or burdensome to these consumers, and past experience has proven that such proposals will result in the de-enrollment of a significant percentage of otherwise eligible subscribers who simply do not respond to requests for action. Sprint advised that it had de-enrolled tens of thousands of Lifeline subscribers who did not respond to requests to submit the requisite annual recertification form. Sprint also advised that the percentage of customers who failed to respond increases dramatically when they are asked to submit specific documentation (citing Sprint's experience with the TPIV historic audit, and the recertification response rates in Missouri in years that documentation is required vs. years that no documentation is required).

The USAC proposal will also impose significant costs on Lifeline service providers. Sprint has estimated that the cost of contacting affected subscribers (direct mail, SMS messages, outbound calls) to request eligibility documentation, and of processing, reviewing and storing any documentation received, will be several dollars per affected subscriber.

Rather than requiring Lifeline subscribers to re-submit new eligibility documentation, Sprint urged the Commission to implement an industry proposal that eligibility be demonstrated by documentation already held by service providers as part of the enrollment process, or obtained through the annual recertification process.¹ This industry proposal is entirely consistent with FCC policy and rules governing the annual recertification process and eligibility audits, is far less burdensome than the USAC proposal, and will help protect eligible consumers from inadvertently losing their Lifeline benefit.

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

c: Ryan Palmer
Jodie Griffin
Rashann Duvall

¹See *ex parte* letter dated June 16, 2017, WCB Docket Nos. 09-197, 10-90 and 11-42, from J. Heitmann (Lifeline Connects Coalition and Boomerang Wireless); D. Frappier (True Wireless, TerraCom and YourTel American); N. Moy (Sprint), and N. Johnson (TruConnect Communications); see also *ex parte* letter dated June 12, 2017, WCB Docket Nos. 09-197, 10-90 and 11-42, from TracFone Wireless.