



August 30, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

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

Dear Ms. Dortch,

On August 28, 2019, Scott Bergmann and Matthew Gerst of CTIA met with Nirali Patel of FCC Chairman Ajit Pai's office to discuss issues related to Lifeline, including the joint petition to pause the December 1, 2019 minimum service standards pending further study in the Wireline Competition Bureau's *State of the Lifeline Marketplace Report*.¹

During the meeting, CTIA expressed support for the Commission's goal of closing the digital divide, particularly through the use of mobile wireless technologies. In pursuit of this goal, CTIA reiterated a commitment to working with the Commission and the Universal Service Administrative Company (USAC) to strengthen the administration of the Lifeline program, which makes these essential communications services more accessible to millions of low-income consumers.

CTIA noted that comments in response to the Petition demonstrate that a broad group of stakeholders with diverse ideologies unanimously support grant of the Petition. Absent action on the

¹ National Consumer Law Center, on behalf of its low-income clients, National Hispanic Media Coalition, OCA – Asian Pacific American Advocates, United Church of Christ, OC, Inc.; and CTIA, Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, and 10-90 (filed June 27, 2019) (Petition). See also *Wireline Competition Bureau Seeks Comment on Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study*, Public Notice, DA 19-617 (WCB rel. July 1, 2019).



Petition, the record confirms that the December 1, 2019 minimum service standards will result in: (1) an unanticipated nearly five-fold increase in the minimum required broadband data usage allowance², and (2) the phase-down in support for voice services, which are still relied upon by over 40 percent of current Lifeline subscribers. As these changes were not contemplated in the Commission's *2016 Lifeline Reform Order*, the record demonstrates that allowing the flash-jump to the new minimum service standards and phase-down in voice support without accounting for the market realities of 2019 would restrict eligible low-income consumers' access to Lifeline broadband and voice service offerings, particularly among low-income consumers who would not otherwise purchase voice or broadband services. Thus, CTIA encouraged the Commission to grant the Petition to maintain eligible low-income consumers' ability to choose from Lifeline service plans that meet the current minimum standards of 2 GB per month of mobile wireless broadband data and 1,000 minutes of use per month of mobile voice services, pending the *State of the Lifeline Marketplace Report* that the Commission directed the Bureau to complete by June 30, 2021.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed in ECFS and provided to the Commission participants. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Matthew Gerst

Matthew Gerst
Vice President, Regulatory Affairs

cc: Nirali Patel

² See, FCC, Wireline Competition Bureau Announces Updated Lifeline Minimum Service Standards and Indexed Budget Amount, rel. July 25, 2019 (announcing that the Lifeline minimum service standard for mobile broadband data usage will increase to 8.75 GB per month beginning Dec. 1, 2019); see also, Petition at 4, n. 12 (estimating a minimum service standard for mobile broadband data usage of 9.5 GB per month).