

September 25, 2019

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St. SW
Washington, D.C. 20554

Re: USTelecom *Ex Parte* Notice, WC Docket Nos. 17-287, 11-42, 09-197

Dear Ms. Dortch:

On September 23, 2019, the undersigned, along with Anisa Latif and Terri Hoskins of AT&T, Job Benedict and Tiffany Smink of CenturyLink, Ann Morrison and Julie Poon of Consolidated, Chris Burke of Frontier, and Alan Buzacott of Verizon met with Nirali Patel, Wireline Advisor to Chairman Pai, and Victoria Randazzo, legal intern, to discuss (1) the Lifeline item circulated on August 19, 2019;¹ (2) pending petitions regarding the Lifeline minimum service standards;² and (3) the announcement of the most recent launch of the National Verifier.³ This same group, along Thomas Whitehead and Tim Loken of Windstream but absent Ms. Smink, also met separately with Ryan Palmer, Trent Harkrader, Jodie Griffin, Allison Jones, Micah Caldwell, and Nicholas Page of the Wireline Competition Bureau to discuss the same three issues listed above.⁴

The USTelecom representatives discussed press reports indicating that the item on circulation addresses the Lifeline Representative Accountability Database (RAD).⁵ To the extent that those reports are correct, USTelecom reiterated its concerns about requiring individual employees of USTelecom's members to provide personally identifiable information (PII) to the RAD if they interact with the National Verifier (NV) database or the National Lifeline Accountability Database (NLAD) and/or are involved in Lifeline subscriber enrollment.⁶ When considering mandatory procedures for the RAD, USTelecom encouraged the Commission to

¹ *FCC Items on Circulation*, <https://www.fcc.gov/items-on-circulation> (last visited Sept. 24, 2019).

² *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); *Wireline Competition Bureau Seeks Comment on NTCA Petition for Waiver*, DA 19-722, Public Notice (rel. July 30, 2019).

³ *Wireline Competition Bureau Announces the Launch of the National Lifeline Eligibility Verifier for All New Enrollments in Eleven States*, WC Docket No. 11-42, Public Notice, DA 19-936 (WCB Sept. 23, 2019).

⁴ Ms. Smink, Ms. Morrison, Ms. Poon, Ms. Burke, Mr. Whitehead, and Mr. Loken participated by teleconference.

⁵ Letter from Mike Saperstein, Vice President, USTelecom, to Marlene Dortch, Secretary, FCC (July 3, 2019).

⁶ See, e.g., Monica Hogan, *FCC Circulates Proposed Order and FNPRM to Curb Lifeline Waste, Fraud and Abuse*, Comm. Daily, (Aug. 20, 2019); Monica Hogan, *Refocus Efforts on Stabilizing Lifeline, FCC Asked Amid Other Actions*, Comm. Daily, (Sept. 16, 2019).

Ms. Marlene Dortch
September 25, 2019
Page 2

factor in the significant differences between employees of USTelecom's members and those of other Lifeline eligible telecommunications carriers (ETCs) that may be using sales agents.

The USTelecom representatives also discussed the petitions currently pending before the Commission that advocate delaying implementation or more robust minimum service standards, or grandfathering the current minimum service standards. USTelecom members are actively working to prepare for the minimum service standard changes set for December 1, 2019. To the extent the Commission is considering postponing the implementation date, USTelecom emphasized the importance of knowing this as soon as possible to prevent customer confusion and avoid administrative difficulties with carriers' IT systems. Finally, the USTelecom representatives discussed continued expansion of the National Verifier program, including the recent announcement of hard launch rollout to eleven additional states.

USTelecom continues to support the Commission's efforts to end waste, fraud, and abuse in the Universal Service Fund program, including Lifeline.

Please contact me with any questions.

Sincerely,

_____/s/_____

Kristine Hackman
Vice President, Policy & Advocacy

cc: Nirali Patel
Victoria Randazzo
Ryan Palmer
Trent Harkrader
Jodie Griffin
Allison Jones
Micah Caldwell
Nicholas Page