



November 5, 2019

VIA ELECTRONIC FILING

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

Re: ***Ex Parte Letter**, 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:

CTIA and its member companies have long supported a robust Lifeline program that can help millions of eligible low-income consumers utilize mobile wireless services to meet their basic communications needs, while also supporting the Commission's efforts to eliminate waste, fraud and abuse from the Lifeline program. As described in the pending Joint Petition¹, CTIA remains concerned that the impending four-fold increase in minimum service standards for mobile wireless data from 2 GB to 8.75 GB on December 1, 2019, as well as the phase-down in support for voice services, will severely hinder eligible low-income consumer's ability to choose Lifeline supported mobile wireless services. To address these concerns, the Joint Petition asked the Commission to pause—pending further study—the minimum service standards for mobile wireless data and the phase-down in Lifeline support for voice services that would otherwise take effect on December 1, 2019.

Recently, TracFone proposed a reasonable alternative to meaningfully increase the minimum service standards for mobile wireless data services, while mitigating the negative impact to low-income consumers that would be caused by the minimum service standards that the Commission has directed to take effect on December 1, 2019.² Specifically, TracFone suggests that the Commission increase the minimum service standard for mobile wireless data to 3 GB per month until the Commission has an opportunity to evaluate 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) (Joint Petition).

² See, Letter from Joshua S. Turner, Counsel to TracFone to Marlene H. Dortch, FCC, WC Docket Nos. 11-42, 09-197, 10-90 (filed Oct. 30, 2019) (TracFone Letter).



appropriate level of the minimum service standard in the *State of the Lifeline Marketplace Report*, which it suggests the FCC place on an accelerated timeline for completion.³ TracFone's proposal provides a rational means for the Commission to continue to increase the minimum service standards while taking care to avoid unintended consequences for millions of Lifeline eligible low-income consumers.

For these reasons, CTIA encourages the Commission to grant the Joint Petition consistent with the modifications suggested by TracFone.

Sincerely,

/s/ Matthew Gerst

Matthew Gerst
Vice President, Regulatory Affairs

cc: Nirali Patel
Arielle Roth
Joseph Calascione
Travis Litman
William Davenport
Kris Monteith
Trent Harkrader
Ryan Palmer
Jodie Griffin

³ TracFone Letter at 2.