



November 9, 2018

**VIA ELECTRONIC FILING**

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

**Re:           Ex Parte Presentation,** Bridging the Digital Divide for Low-Income Consumers, WC Docket No. 17-287, Lifeline and Link Up Reform and Modernization WC Docket No. 11-42, and Telecommunications Carriers Eligible for Universal Service Support WC Docket No. 09-197

Dear Ms. Dortch,

On November 7, 2018, Matthew Gerst of CTIA and outside counsel L. Charles Keller of Wilkinson Barker Knauer LLP met with Trent Harkrader, Ryan Palmer, Jodie Griffin, and Allison Baker from the Wireline Competition Bureau to discuss issues related to the Lifeline program in the above-referenced dockets.

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 affordable for millions of low-income consumers.

As long-time supporters of the National Lifeline Eligibility Verifier, CTIA discussed its implementation, including opportunities for deployment of an Application Program Interface that can both enable efficient verification for eligible low-income consumers and safeguard program integrity. CTIA reiterated a commitment to collaborating with the Commission and USAC to close the digital divide through the Lifeline program and strengthening the program's



integrity by supporting the technical and procedural solutions that will ensure the success of the National Lifeline Eligibility Verifier.

CTIA also discussed its views on a number of proposed reforms to strengthen the integrity of the Lifeline program, consistent with its comments filed in response to the Commission's *Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry*.<sup>1</sup> Further, CTIA encouraged the Commission to act on its Petition for Reconsideration of the *2016 Lifeline Third Report and Order* by adopting a more economically justifiable long-term minimum service standard for mobile broadband data usage allowances.<sup>2</sup>

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  
Assistant Vice President, Regulatory Affairs

cc: Trent Harkrader  
Ryan Palmer  
Jodie Griffin  
Allison Baker

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<sup>1</sup> Comments of CTIA, WC Docket Nos. 17-287, 11-42, 09-197 (filed Feb. 21, 2018).

<sup>2</sup> Petition for Reconsideration of CTIA, WC Docket Nos. 11-42, 09-197, 10-90 (filed June 23, 2016); see also, *Petitions for Reconsideration of Action in Lifeline Rulemaking Proceeding*, Public Notice, WC Docket Nos. 11-42, 09-197, 10-90, Report No. 3046 (rel. June 30, 2016).