



WASHINGTON, DC

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November 13, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: 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; Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197; Connect America Fund, WC Docket 10-90; Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

Paul Greene, CEO of Prepaid Wireless Group (“PWG”), and Eric Schimpf, COO of Global Connection Inc. of America dba StandUp Wireless (“StandUp”), together with the undersigned, spoke by conference call (1) on November 12, 2019 with Dr. Alisa Valentin, Special Advisor to Commissioner Starks, (2) on November 12, 2019 with Travis Litman, Chief of Staff and Senior Legal Advisor, Wireline and Public Safety, to Commissioner Rosenworcel, (3) on November 13, 2019 with Joseph Calascione, Legal Advisor, Wireline, to Commissioner Carr, and (4) on November 13, 2019 with Joel Miller, Chief of Staff to Commissioner O’Rielly. The purpose of the calls was to discuss the Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study pending before the Commission.¹

In each call, Mr. Greene and Mr. Schimpf explained that PWG and StandUp provide voice-centric services to low-income customers with the greatest need. They agree with TracFone Wireless, Inc. and CTIA that decreasing the \$9.25 per month subsidy for voice compliant services on December 1, 2019 will immediately restrict the availability of voice-only

¹ See Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (June 27, 2019) (“Joint Petition”).



services to low income Americans, and ultimately result in services being withdrawn.² They also explained that neither the deployment of robust VoLTE technology nor the adoption of over-the-top voice applications by low-income customers has progressed as quickly as the Commission had expected when it adopted the voice sunset in 2016. Accordingly, large numbers of voice-centric customers are neither ready nor able to transition to broadband-only service, should voice service no longer be supported.

They thus urged the Commission to grant the Joint Petition, or, in the alternative, to adopt TracFone's proposal to retain the \$9.25 per month subsidy for voice-compliant services and to increase the minimum service standard for mobile broadband to 3 GB per month pending the outcome of the Commission's planned State of the Lifeline Marketplace Report ("Marketplace Report"). PWG and StandUp also support the proposal of the National Lifeline Association ("NaLA") and Q Link Wireless LLC ("Q Link") to provide full support for bundled service offerings of 3,000 units with a specified allocation of 2 GB of mobile broadband plus 1,000 minutes of voice per month.³ Additionally, and consistent with the structure of the TracFone and NaLA/Q Link proposals, PWG and StandUp proposed that if the Commission intended to decrease the subsidy for 1,000 minutes of voice service to \$7.25 per month on December 1, ETCs should be allowed the option of continuing to receive a subsidy of \$9.25 per month in exchange for providing 3,000 minutes of voice service. This option would give ETCs the flexibility to retain a necessary subsidy for voice-centric consumers while the Marketplace Report is pending, provided they were willing to offer more voice service to the low-income customers who rely on it.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-referenced proceeding.

Respectfully submitted,

/s/ Jeffrey Carlisle

Jeffrey Carlisle

Counsel to Prepaid Wireless Group and
StandUp Wireless

² See Letter from Joshua S. Turner, Counsel to TracFone, to Marlene H. Dortch, FCC Secretary, WC Docket Nos. 11-42, 09-197 and 10-90 (filed Oct. 30, 2019) at 7; Letter from Matthew Gerst, CTIA, to Marlene H. Dortch, FCC Secretary, WC Docket Nos. 11-42, 09-197 and 10-90 (filed Nov. 5, 2019) at 1.

³ See Letter from John J. Heitmann, Counsel to NaLA and Q Link, to Marlene H. Dortch, FCC Secretary, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 (filed Nov. 6, 2019) at 2.



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cc: Dr. Alisa Valentin
Travis Litman
Joseph Calascione
Joel Miller
Kris Monteith
Trent Harkrader
Ryan Palmer
Jodie Griffin
Nathan Eagan