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November 18, 2019

By ECFS

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

Re: **National Lifeline Association and Q Link Wireless LLC Joint Notice
of Oral *Ex Parte* Presentation, WC Docket Nos. 17-287, 11-42, 09-197
and 10-90**

Dear Ms. Dortch:

On Thursday, November 14, 2019, John Heitmann and Joshua Guyan of Kelley Drye & Warren LLP spoke by phone on behalf of the National Lifeline Association (NaLA) and Q Link Wireless LLC (Q Link) with Nicholas Degani, Senior Counsel to Chairman Ajit Pai. The same day and on Friday, November 15, 2019, Mr. Heitmann spoke by phone separately with Dr. Alisa Valentin, Special Advisor to Commissioner Geoffrey Starks and Travis Litman, Chief of Staff and Senior Legal Advisor, Wireline and Public Safety to Commissioner Jessica Rosenworcel. We continued to urge the Commission to grant the pending Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study filed by CTIA, the National Consumer Law Center, National Hispanic Media Coalition, OCA – The Asian Pacific American Advocates, and United Church of Christ, OC, Inc.¹ **as filed** for the reasons detailed in NaLA's recent *ex parte* letters and comments filed on the Joint Petition,² and Q Link's *ex parte* letter and comments filed on the Joint Petition.³

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 to Pause Implementation).

² See National Lifeline Association Notice of Oral *Ex Parte* Presentations, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 at 10 (filed Aug. 29, 22 and 16, 2019); National Lifeline Association Comments on 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 (filed July 31, 2019).

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Alternatively, we argued that the Commission should support three minimum service options as of December 1, 2019 to avoid imposing a price increase on existing Lifeline subscribers and to ensure the availability of affordable service offerings for all Lifeline-eligible consumers in all states. Our advocacy was consistent with prior *ex partes*.⁴ In addition, we expressed support for retaining full support for voice services.⁵

³ See Q Link Wireless LLC Notice of Oral *Ex Parte* Presentation, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 (filed Aug. 29 and 22, 2019); Q Link Wireless Comments on 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 (filed July 31, 2019).

⁴ See National Lifeline Association and Q Link Wireless LLC Notice of Oral *Ex Parte* Presentation, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 (filed Nov. 1, 6, 13 and 15, 2019).

⁵ In a recent *ex parte* letter, the public interest, consumer and civil rights organizations that filed the Joint Petition to Pause Implementation with CTIA stated “[w]e collectively continue to be concerned with any decrease in voice-only services or in voice-only subsidy support” and “we reject any proposal that reduces the level of voice-only support without a proper survey of the marketplace” and NaLA and Q Link do not oppose that position. National Consumer Law Center, National Hispanic Media Coalition, OCA – The Asian Pacific American Advocates, and United Church of Christ, OC, Inc. *Ex Parte* Presentation, WC Docket Nos. 17-287, 11-42, 09-197 and 10-90 at 1 (filed Nov. 13, 2019). We believe the 3,000 minutes for \$9.25 proposal from Prepaid Wireless Group and Global Connection offers consumers that only want voice service a good alternative option. See Prepaid Wireless Group and Global Connection Inc. *Ex Parte*, WC Docket Nos. 17-287, 11-42, 09-197, 10-90 (filed Nov. 8, 2019).

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Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.



Respectfully submitted,

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cc: Nicholas Degani
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