

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
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
)	

**COMMENTS OF TRACFONE WIRELESS, INC. IN SUPPORT
OF Q LINK WIRELESS, LLC PETITION FOR LIMITED WAIVER**

TracFone Wireless, Inc. (“TracFone”), by its attorneys, comments in support of the November 1, 2018 petition of Q Link Wireless, LLC (“Q Link”) for a limited waiver to permit alternative transmission of Lifeline eligibility information and customer certification to the National Verifier. By public notice issued November 9, 2018, the Commission has invited comment on the Q Link petition.¹

Q Link has long been a strong proponent of the importance of the National Verifier including an application programming interface (“API”) which would enable eligible telecommunications carriers to access the National Verifier on a machine-to-machine basis to verify Lifeline applicants’ eligibility for enrollment in the Lifeline program. TracFone also has long advocated the importance of API as an essential component of the National Verifier. Other Lifeline providers including, for example, Telscape Communications, Inc. d/b/a TruConnect,

¹ Public Notice – Wireline Competition Bureau Seeks Comment on Petition of Q Link Wireless, LLC for a Limited Waiver to Permit Alternative Transmission of Lifeline Eligibility Information and Customer Certifications to the National Verifier, DA 18-1152, released November 9, 2018.

Telrite Corporation,² those Lifeline providers who are members of the National Lifeline Association,³ and CTIA⁴ on behalf of its members, all have commented in these proceedings on the importance of API, from a consumer convenience perspective, from a fraud prevention perspective, and from an operational efficiency perspective. Significantly, those parties have explained how inclusion of API as part of the National Verifier will enhance the efficiency of the National Verifier and will result in cost savings to the Universal Service Administrative Company – costs which are borne by telecommunications carriers through their Universal Service Fund contributions and which are ultimately borne by millions of consumers who pay for those carrier contributions through assessed Universal Service Fund surcharges. Conspicuously absent from the record of these proceedings is any factual information which refutes those claims regarding the benefits of API, including those operational efficiency benefits.

Q Link has asked the Commission for a waiver to allow it to submit Lifeline eligibility documentation to the National Verifier via bulk transfer. This waiver, if granted, would be applicable in all “hard launch” states (*i.e.*, states where use of the National Verifier is now mandatory). The requested waiver would remain in effect pending resolution of Q Link’s emergency petition filed July 3, 2018.

TracFone’s views on the importance of API to the effective implementation of the National Verifier have been stated in multiple submissions in these proceedings and are a matter of record

² Letter from Judson H. Hill, Esq., advisor to Telscape Communications, Inc. d/b/a TruConnect and Sage Telecom Communications, LLC. and Telrite Corporation, filed November 12, 2018.

³ Letter from John J. Heitman and Joshua Guyan on behalf of the National Lifeline Association, filed November 9, 2018.

⁴ Letter from Matthew Gerst, Assistant Vice President, Regulatory Affairs, CTIA, filed November 9, 2018.

before the Commission.⁵ TracFone supports Q Link's waiver petition and respectfully urges the Commission to grant the requested waiver. However, that waiver, if granted, should be applicable to all Lifeline providers, including TracFone. Given the record before the Commission which overwhelmingly favors mandatory inclusion of API as part of the National Verifier, TracFone remains hopeful that the Commission will soon act favorably on that proposal. Until that occurs, all Lifeline providers should be allowed to submit Lifeline enrollment eligibility information to the National Verifier via bulk transfers as requested by the Q Link waiver petition.

Respectfully submitted,

TRACFONE WIRELESS, INC.



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November 21, 2018

⁵ See, e.g., Comments of TracFone Wireless, Inc. Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier, filed August 10, 2018.