

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Bridging the Digital Divide for Low-)	WC Docket No. 17-287
Income Consumers, Lifeline and Link Up)	
Reform and Modernization)	
)	
Lifeline and Link Up Reform and)	WC Docket No. 11-42
Modernization)	
)	
Telecommunications Carriers)	WC Docket No. 09-197
Eligible for Universal Service)	
Support)	

**NATIONAL LIFELINE ASSOCIATION COMMENTS 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**

The National Lifeline Association¹ (NaLA) respectfully submits these comments in support of the Petition of Q Link Wireless, LLC for Limited Waiver to Permit Alternative Transmission of Lifeline Eligibility Information and Customer Certifications to the National Verifier (Q Link Waiver Petition) filed on November 1, 2018.² Q Links seeks a limited waiver to provide proof of eligibility in bulk transfers to the National Verifier because the Universal Service Administrative Company (USAC) has thus far failed to implement a service provider application programming interface (API) in the National Verifier for the efficient exchange of Lifeline application data.

¹ NaLA is the only industry trade group specifically focused on the Lifeline segment of the communications marketplace. It supports eligible telecommunications carriers (ETCs), distributors, Lifeline supporters and participants and partners with regulators to improve the program through education, cooperation and advocacy. See <https://www.nalalifeline.org/>.

² See Petition of Q Link Wireless, LLC for Limited Waiver to Permit Alternative Transmission of Lifeline Eligibility Information and Customer Certifications to the National Verifier, WC Docket Nos. 17-287, 11-42, 09-197 (filed Nov. 1, 2018); *Wireline Competition Bureau Seeks Comment on Petition of Q Link Wireless, LLC for Limited Waiver to Permit Alternative Transmission of Lifeline Eligibility Information and Customer Certifications to the National Verifier*, WC Docket Nos. 17-287, 11-42, 09-197, Public Notice, DA 18-1152 (rel. Nov. 9, 2018)(Public Notice).

NaLA has long supported including a service provider API in the National Verifier³ and supports Q Link's request for a limited waiver as an interim solution that should be granted for all Lifeline eligible telecommunications carriers (ETCs) until the service provider API is implemented.

The Q Link Waiver Petition seeks a waiver to permit Q Link "in 'hard launch' states to submit eligibility documentation to the National Verifier via bulk transfer to facilitate its review of consumer eligibility."⁴ Specifically, for program-based applications where state databases are available, Q Link would dip the state database and provide proof of the dip to the National Verifier, along with the associated application and applicant identification information.⁵ For program or income-based applications where state databases are not available, Q Link would provide proof of program-based or income-based eligibility to the National Verifier, along with the associated other application information.⁶ This solution can be used by all ETCs and would allow the National Verifier to continue to make all eligibility determinations in "hard launch" states.

The Q Link Waiver Petition is "limited to the interim period until the Commission acts on Q Link's Emergency API Petition and/or otherwise takes action to implement APIs in the National Verifier to support the data exchange necessary for carrier-assisted online enrollment."⁷ NaLA supports Q Link's waiver solution for all ETCs only as an interim solution and emphasizes that the

³ NaLA and its members that constituted the Lifeline Connects Coalition, in concert with nearly all Lifeline service providers, have long advocated for a service provider API in the National Verifier. *See e.g.*, Comments of the National Lifeline Association, WC Docket Nos. 17-287, 11-42, 09-197 at 77-79 (filed Feb. 21, 2018); Reply Comments of the National Lifeline Association, WC Docket Nos. 17-287, 11-42, 09-197 at 27 (filed Mar. 23, 2018); Letter from John J. Heitmann, Counsel to the Lifeline Connects Coalition, to Marlene Dortch, Secretary, FCC, WC Docket Nos. 11-42, 09-197, 10-90 at 4-7 (filed Sept. 11, 2017) (Lifeline Connects API *Ex Parte*).

⁴ Q Link Waiver Petition at 1.

⁵ *See id.* at 11. The National Verifier would not be bound by the ETC's dip of the state database and could perform its own database dip. *See id.* at 2.

⁶ *See id.* at 11.

⁷ *Id.*

Commission and USAC must promptly move to implement a service provider API in the National Verifier to facilitate an efficient and effective enrollment process that serves consumers while safeguarding the Lifeline program through an independent determination of eligibility.

To that end, NaLA also supported the 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 (Q Link Petition) filed on July 5, 2018.⁸ Q Link correctly explained the problems with failing to include an API for service providers to communicate with the National Verifier as they currently do with the National Lifeline Accountability Database (NLAD) and the detrimental impacts particularly on rural consumers and those seeking to enroll in the Lifeline program online. NaLA supported the Q Link Petition because the Commission's and USAC's failure to include a service provider API in the National Verifier would have a severely negative impact on all Lifeline service provider business models (including in-person enrollments)⁹ and eligible low-income Americans. The Commission should grant the Q Link Petition and direct USAC to implement a service provider API into the National Verifier as soon as technically possible.

⁸ See 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, WC Docket Nos. 17-287, 11-42, 09-197 (filed July 5, 2018); *Wireline Competition Bureau Seeks Comment on 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*, WC Docket Nos. 17-287, 11-42, 09-197, Public Notice, DA 18-718 (rel. July 11, 2018) (Public Notice); NaLA Comments on 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, WC Docket Nos. 17-287, 11-42, 09-197 (filed Aug. 10, 2018). NaLA previously expressed its support for the Q Link Petition in an *ex parte* letter filed with the Commission on July 12, 2018. See Letter from John J. Heitmann, Counsel to the National Lifeline Association, to Marlene Dortch, Secretary, FCC, WC Docket Nos. 17-287, 11-42, 09-197 (filed July 12, 2018).

⁹ Implementation of a service provider API should apply for all enrollments whether online, over the phone/IVR or in-person.

NaLA respectfully urges the Commission to allow all ETCs to submit proof of eligibility documentation to the National Verifier in bulk as described in the Q Link Waiver Petition until USAC can implement a service provider API into the National Verifier.

Respectfully submitted,

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November 23, 2018