



December 3, 2018

Via Electronic Mail

Ms. Michelle Garber
Vice President, Lifeline Program
USAC
700 12th Street, NW, Suite 900
Washington, DC 20005

**Re: Submission of Reverification Information for Lifeline Subscribers Not Found
in National Verifier States
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42**

Dear Ms. Garber:

On behalf of Sprint's Assurance Wireless affiliate, I am writing to request a revision to USAC's deadlines for submission of reverification information for certain customers affected by the launch of the National Verifier ("NV") in Colorado, Mississippi, Montana, New Mexico, Utah and Wyoming. USAC's original schedule (issued October 2, 2018) must be revised to reflect the fact that service providers were not advised of the availability of the final report listing the subscribers for whom updated documentation was required, and the type of additional documentation being requested, until November 16, 2018. An updated schedule will ensure that end users and their service providers have the entire allotted time to respond, increase the likelihood that eligible end users will remain enrolled in the Lifeline program, and ensure compliance with the FCC rule governing the recertification notice period.

Background

As you are aware, customers in the initial NV states were divided into 4 groups based upon their service enrollment dates. USAC undertook automated eligibility and validation checks of all Lifeline subscribers in the initial NV states; USAC was then to provide a report to Lifeline service providers detailing which subscribers "passed" and which needed additional documentation. In July 2018, USAC stated that ETCs would be required to provide valid documentation for any subscribers not found by USAC in its automated review according to the following schedule:¹

Group 1	Report date + 20 days
Group 2	Report date + 90 days
Group 3	Report date + 120 days
Group 4	Report date + 20 days

On October 2, 2018, USAC issued a bulletin specifying the following dates by which ETCs were to submit any requisite reverification information:

¹ USAC webinar material presented on July 10, 2018, p. 12.

Group 1	October 22, 2018 (20 days from bulletin)
Group 2	January 2, 2019 (90 days from bulletin)
Group 3	January 30, 2019 (120 days from bulletin)
Group 4	To be determined

45 days later, on November 16, 2018, USAC issued a bulletin notifying ETCs of the availability of the final report.² USAC had explicitly directed ETCs not to conduct outreach to affected subscribers until it had notified ETCs of the availability of this report, to ensure that USAC had completed its analysis.³ No adjustment to the due dates for the submission of additional reverification information (as specified in the October 2 bulletin) was made to reflect the much later release of the final report.

Because an initial list of Group 1 subscribers had been released in August, Assurance Wireless was able to provide the requisite additional information for these subscribers to USAC by October 22. (No similar preliminary report was issued for Groups 2-4 in August.) Assurance Wireless is currently engaged in outreach to Group 2 and 3 customers to obtain the requisite documentation, and it is these subscribers for whom we are requesting a revised submission schedule.

Revised Schedule

Assurance Wireless is committed to doing all it can to provide USAC with valid documentation proving that its subscribers are eligible to continue to receive the Lifeline benefit. Due to the far later than expected release of the report listing subscribers for whom additional information was needed, we are deeply concerned that the originally scheduled response due dates for Group 2 and 3 customers do not leave enough time to accomplish this objective and that tens of thousands of otherwise eligible end users will be de-enrolled from the Lifeline program. If Group 2 responses remain due by January 2, 2019, end users will have only 47 days (as opposed to the originally anticipated 90 days); if the Group 3 response due date remains January 30, 2019, end users will have only 75 (rather than 120) days to respond. Significantly, these timeframes fall during one of the busiest times of the year (and include 3 or 4 federal holidays), when end users are distracted by the holidays, including higher than average volumes of mail such that Lifeline outreach correspondence may go unnoticed, and many service provider employees are on holiday leave. Moreover, the abbreviated deadline for Group 2 subscribers is inconsistent with Section 54.405(e)(4) of the FCC's rules, which requires that "[a] subscriber must be given 60 days to respond to recertification efforts."

To ensure compliance with the FCC's explicit rule, and to incorporate the notice schedules published by USAC last July, Assurance Wireless urges USAC to extend and clarify the due dates for submission of any requisite reverification information as follows:

² We would note that on November 1, Sprint's vendor, Solix, emailed USAC asking when the report would be available; USAC's response was that "There has not been an announced date yet. USAC will be making an announcement to notify service providers at a later date."

³ USAC webinar material presented July 10, 2018, p. 16.

	Revised Due Date
Group 2	February 14, 2019
Group 3	March 16, 2019

	Clarification of Due Date
Group 4	Report release date + 20

USAC's prompt attention to this matter would be greatly appreciated. Assurance Wireless remains committed to working closely with USAC, and other members of the industry, to help ensure the smooth implementation of the NV and to improve the flow of critical information.

If you have any questions, please feel free to contact me at (703) 433-4503.

Sincerely,

/s/ Norina T. Moy

Norina T. Moy
Director, Government Affairs

Cc: Ryan Palmer, FCC
Trent Harkrader, FCC