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December 6, 2018

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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

**Notice of Oral and In-Person Ex Parte Communications**

Dear Ms. Dortch:

On December 4, 2018, Geoffrey Why, Counsel for TracFone Wireless, Inc. (“TracFone”) met by telephone with Ryan Palmer, Division Chief of the Wireline Competition Bureau’s Telecommunications Access Policy Division. Mr. Why and Mr. Palmer discussed the National Verifier program and the launch of the National Verifier. Their discussion included topics set forth in TracFone November 30, 2018 “Emergency Petition of TracFone Wireless, Inc. for an Order Directing USAC to Alter the Implementation of the National Verifier and a Waiver of 47 C.F.R. § 54.410(d)(3) and Petition for Rulemaking” (“Emergency Petition”). For example, they discussed TracFone’s concerns relating to the requirement to mandate an issued or expiration date on the acceptable eligibility documentation and its impact on current proofs of eligibility, such as a benefit card used for the SNAP program or a Medicaid card that does not have an issued or expiration date.

On December 4, 2018 Hap Rigby, Senior Policy Advisor, Wiley Rein, LLP, representing TracFone, met by telephone with Nicholas Degani of the Commission’s Chairman’s Office. Mr. Rigby and Mr. Degani discussed topics set forth in the Emergency Petition, including the requirement to mandate an issued or expiration date on the acceptable eligibility documentation and its impact on current proofs of eligibility.

On December 6, 2018, TracFone representatives met in person and on the phone with representatives of the Wireline Competition Bureau and its Telecommunications Access Policy Division. The attendees included the following:

From the Commission’s Wireline Competition Bureau (in person)

- Trent Harkrader - Deputy Bureau Chief of the Wireline Competition Bureau
- Ryan Palmer - Division Chief, Telecommunications Access Policy Division
- Jodie Griffin - Deputy Division Chief, Telecommunications Access Policy Division
- Allison Baker - Telecommunications Access Policy Division
- Allison Jones - Telecommunications Access Policy Division

From TracFone (in person):

- Mark Rubin - Senior Executive for Government Affairs
- Geoff Why - Verrill Dana, LLP Counsel for TracFone
- Shawn Chang - Wiley Rein, LLP Counsel for TracFone

From TracFone (by telephone):

- Javier Rosado, Senior Officer, Business Development and Government Services
- Gina Jasman, Senior Director, Lifeline Services, Lifeline Support
- Elizabeth Simonhoff Perez, Senior Manager, Healthcare, Lifeline Support
- Stephen Athanson, Senior Attorney, Regulatory, Legal and Carrier Relations

Discussions focused on TracFone's Emergency Petition as well as developing and implementing a collaborative process to address issues associated with National Verifier and its launch going forward. The attendees discussed the requirement to mandate an issued or expiration date on the acceptable eligibility documentation and its impact on current proofs of eligibility. Staff indicated that Staff was aware of USAC's rollout of this requirement and Staff approved it. Further, the attendees discussed the Lifeline Eligibility Database, and the implementation of Application Program Interfaces. The attendees also discussed the need for a national eligibility database pursuant to the Commission's 2016 Lifeline Order and how USAC and the Commission are continuously working to ensure that they have access to the federal Medicaid database from Centers for Medicare & Medicaid Services. The attendees discussed the need for Application Program Interfaces to reduce the burden associated with a two-step application process and the progress the Commission is making in resolving that issue.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is filed in ECFS. Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Geoffrey G. Why  
Geoffrey G. Why