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Via Electronic Delivery

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**RE: In the Matter of Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;
Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197;
and Connect America Fund, WC Docket No. 10-90.**

Dear Ms. Dortch:

Michigan Bell Telephone Company d/b/a AT&T Michigan ("AT&T Michigan")¹ submits this letter in support of the November 30, 2017, request filed by the Michigan Public Service Commission ("MPSC") for an extension of its Lifeline waiver. AT&T Michigan's support assumes that the Michigan Legislature, the MPSC and interested parties will take prompt action to align federal and state Lifeline eligibility criteria in 2018, so that the waiver extension will be as limited in duration as is possible under the circumstances.

On December 31, 2016, the Commission granted the MPSC a partial waiver of its Lifeline eligibility rules until December 31, 2017, or until Michigan aligned its eligibility criteria with the FCC's eligibility rules and updated its eligibility databases accordingly, whichever occurred first. The MPSC's subsequent November 30, 2017 request for an extension of its Lifeline waiver states that it needs additional time to work with the Michigan Legislature and other interested parties to make the necessary changes to the Michigan Telecommunications Act to align state and federal eligibility criteria for Lifeline eligibility.

AT&T Michigan agrees that the Michigan Telecommunications Act establishes state eligibility criteria that are different from federal eligibility criteria, and that changes to state law are needed to bring the state criteria in line with the new federal eligibility criteria. AT&T Michigan also agrees that this will require a substantial effort that will include, among other things, preparing of draft legislation, gaining support from interested parties, and winning passage through the Michigan Legislature. AT&T would support the passage of legislation in 2018 to align the Michigan Lifeline eligibility criteria with the federal criteria. A further extension to allow passage of legislation in 2018 would also help avoid the confusion that would inevitably result among ETCs and their customers if eligibility criteria were not aligned by December 31, 2017 and ETCs were therefore required to develop and administer separate state and federal Lifeline programs, with different eligibility criteria.

Given all these considerations, an additional waiver extension in these circumstances is reasonable.

Sincerely,

/s/ Anisa A. Latif
Anisa A. Latif

¹ AT&T Michigan is an incumbent local exchange provider and is the principal provider of traditional landline POTS service in the state of Michigan.