

**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 SPRINT CORPORATION

Sprint Corporation (“Sprint”), pursuant to the Public Notice released on December 4, 2018 (DA 18-1229), hereby respectfully submits its comments on the “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” filed on November 30, 2018 (“TracFone Emergency Petition”). Sprint agrees that technical and operational changes to the National Verifier system will improve its effectiveness and efficiency, including its ability to reduce potential waste, fraud and abuse in the federal Lifeline program.

Background and Introduction

In its petition, TracFone has requested that the FCC direct USAC to implement a list of actions ranging from clarification that the instruction and legal disclosure pages not be required to be included in the application package turned in to USAC,¹ to

¹ TracFone Emergency Petition, p. 2, item 6.

implementation of APIs.² As discussed briefly below, Sprint agrees that many of the items on TracFone's list will improve the efficiency of the National Verifier system, making the process more user-friendly while not compromising the goals of preventing waste, fraud and abuse. Sprint also proposes several additional refinements to the processes of determining Lifeline eligibility and then enrolling eligible Lifeline end users with their preferred service provider. Many of the changes proposed by TracFone and Sprint can be implemented quickly and at minimal expense. All of the changes discussed below will generate benefits to end users, to USAC/the National Verifier, and to Lifeline service providers, which far exceed their cost.

Deployment of APIs

TracFone's "highest priority request" is for the FCC to direct USAC to deploy APIs as part of the National Verifier system.³ The need for and advantages of APIs have been extensively discussed in the record below, and Sprint once again expresses its firm support for use of APIs with the National Verifier.⁴ There can be no dispute that APIs will make the National Verifier system more efficient and effective; the widespread use of APIs in telecommunications and other industries is proof that there are few, if any, technical barriers to deployment of APIs with the National Verifier. Sprint is committed to working with the Commission, USAC, and other industry members to address any concerns that APIs might be manipulated by bad actors intent on engaging in waste, fraud or abuse.

² *Id.*, pp. 2-3, items 9, 10 and 11.

³ *Id.*, p. 21.

⁴ *See, e.g.*, Sprint's August 10, 2018 comments on Emergency Petition of Q Link Wireless in WC Docket Nos. 17-287, 11-42 and 09-197.

SNAP and Medicaid Cards

According to TracFone, USAC is now requiring that SNAP and other program cards will be accepted as proof of participation only if the card has an “issued on date” or an expiration date, and that this new requirement applies in all states for both new Lifeline applicants and for re-verification of current Lifeline participants.⁵ If TracFone’s interpretation is correct, then Sprint agrees that USAC’s revised standard is unduly burdensome and should not go into effect. As TracFone correctly noted (*id.*), current and potential Lifeline customers may not have ready access to the type of supplemental information requested by USAC to confirm their participation in SNAP, Medicaid, or other eligible programs (*e.g.*, the letter that the end user originally received from SNAP approving his or her program participation), even as they have the actual, current and effective program card in their wallets.

Certainly, the optimal solution is for the National Verifier to have automated, real-time access to the relevant program databases for purposes of confirming end user participation, and it is Sprint’s understanding that USAC is actively pursuing this capability. However, pending such automated access, the National Verifier should continue to accept SNAP, Medicaid, and other qualifying program cards as issued by the relevant governmental agency, program administrator, or managed care organization, regardless of whether or not the cards have a date on them, and these cards should be accepted for both initial eligibility determinations and reverifications.

⁵ TracFone Emergency Petition, pp. 8-9.

Identifying the Selected Service Provider on Application Forms

TracFone has recommended (*id.*, p. 15) that the paper application be simplified and modified to allow the end user to select a service provider for enrollment purposes once the National Verifier has ascertained the subscriber's eligibility. Sprint agrees that allowing the end user to select a Lifeline service provider as part of the eligibility process with the National Verifier (not only on paper applications, but on the consumer and service provider portals as well), and requiring the National Verifier to transmit this information to the selected service provider, will streamline the process and facilitate communications between the end user and the service provider. As TracFone correctly noted (p. 16), communication of the customer's selection of service provider from the National Verifier to the service provider via an API is efficient, encourages consumer participation, and will reduce the cost and time to activate an eligible consumer's Lifeline benefit.

If, contrary to service provider recommendations, the Commission and USAC implement the National Verifier without an API, TracFone's proposal to allow end users to pre-select a service provider should be refined as follows:

- USAC revises the National Verifier paper and Web applications to allow the consumer to pre-select a service provider during the application process.
- USAC publishes a daily report for service providers that identifies the end users who pre-selected the service provider during the application process. These reports could be included with the NLAD reports that are currently published.
- Service providers use these reports to enroll consumers in NLAD and establish their individual Lifeline accounts.

This process allows USAC to retain full control over the eligibility determination process while improving the overall consumer experience and facilitating the service provider account installation process.

Submission of Instruction and Legal Disclosure Pages

TracFone has asked that the FCC direct USAC not to require submission of the separate instruction and legal disclosure pages of an application form in order for USAC to deem the application complete.⁶ While it was Sprint's understanding that USAC had previously made this clarification, formal memorialization to this effect will ensure that all parties are aware of USAC's guidance in this regard.

Sprint's Additional Refinements

The National Verifier system is a significant change to the way Lifeline program applications have been handled and eligibility determinations made, and as the TracFone Emergency Petition has made clear, the lack of coordination relating to the roll-out of the National Verifier has had serious negative consequences. To improve the implementation of the National Verifier system, Sprint recommends the following additional refinements:

- Improve communication with service providers about deployment schedules. The launch of the National Verifier in the first three sets of states/territories has been made on very short notice; for example, industry members were given only four days' notice that the National Verifier would be soft launched in Guam, Hawaii, Idaho, New Hampshire, North Dakota and South Dakota.⁷

Greater advance notice of National Verifier soft and hard launch dates, and notice of anticipated launch dates for the remaining states, is critical to service provider planning needs. For example, Sprint needs sufficient advance notice to make the following operational changes prior to cut-over to the National Verifier in a given state:

- change our mobile application process for the specific state to follow the National Verifier flow;
- change our Web application process for the specific state to follow the National Verifier flow;

⁶ *Id.*, p. iii.

⁷ "Wireline Competition Bureau Announces the Launch of the National Lifeline Eligibility Verifier in Five Additional States and One Territory" on October 15, 2018, Public Notice released October 11, 2018, DA 18-1042.

- change any paper applications to be consistent with the National Verifier version of the application (including printing the National Verifier address);
 - train/refresh the training of outreach agents and Care representatives about the National Verifier process;
 - halt eligibility review by our third party agent of applications that will instead be reviewed by the National Verifier;
 - ensure that our third party agent has completed its eligibility review of any applications received prior to the National Verifier cut-over date in a given state;
 - ensure that end users whose “old” (pre-National Verifier) applications are pending support documents or IEH worksheets are sent a new National Verifier application after the cut-over date.
- Switch steps 2 and 3 of the processing flow in states that do not offer real-time access to their databases (“batch states”). In batch states (currently, North Carolina, Missouri and Tennessee), the National Verifier processing flow is as follows: (1) check Federal HUD database for the Lifeline applicant; (2) check state database for the Lifeline applicant (can take 1-3 days); and (3) applicant uploads his or her documentation which is then reviewed by the National Verifier if the applicant was not found in the state database. Since the majority of applicants qualify based on their participation in SNAP or Medicaid, most applicants will not be found in the Federal HUD database and will have to go through the state batch process. The processing delay means that near real-time eligibility decisions cannot be rendered. Sprint recommends that the National Verifier switch steps 2 and 3 – accept document uploads for review, and finally do the state database batch review if necessary. This change will increase the percentage of near real-time eligibility determinations by the National Verifier, and enable end users who are being assisted by a live agent to establish service and (where applicable) receive a handset in an uninterrupted process flow.
 - Increase consumer education and outreach by the FCC and USAC. Sprint urges the Commission and USAC to engage in greater outreach to educate consumers about the deployment of the National Verifier in their state, and about the new processes involved in applying for Lifeline, getting an eligibility determination, and subsequently enrolling as a customer with their chosen Lifeline service provider. More aggressive customer outreach by the Commission and USAC will help to ensure that accurate information is disseminated by a neutral official entity.
 - Allow submission of eligibility documentation via an “app.” In National Verifier states, USAC should allow end user eligibility documentation to be uploaded through the service provider portal via an app rather than via a photo taken by the service provider agent.⁸ Uploading via an app helps to ensure the security and

⁸ Today, requests for eligibility determinations submitted through the service provider portal requires that the service provider agent take a picture of the support documents and then upload the picture to the portal.

proper use of an end user's eligibility documents, particularly because such documents are not stored on the agent's tablet or other device. Such apps currently exist, and Sprint believes that implementation of such apps would be relatively easy and inexpensive.

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To help ensure the successful implementation of the National Verifier system, Sprint supports the refinements discussed above. The recommended changes will increase the efficiency and effectiveness of the National Verifier, and the resulting benefits outweigh the costs and promote the public interest.

Respectfully submitted,

SPRINT CORPORATION

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December 18, 2018