



October 30, 2014

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

Re: *Ex Parte* disclosure pursuant to 47 CFR § 1.1206(b) in CC Docket No. 96-45, WC Docket No. 03-109; MB Docket Nos. 09-182, 07-294, 14-50

Dear Ms. Dortch:

On October 28, 2014, the following individuals met with Commissioner Mignon Clyburn, and her staff Rebekah Goodheart, Adonis Hoffman, and Ben Friedman: Cheryl Leanza, Task Force Co-Chair, United Church of Christ, OC Inc.; Gabe Rottman, Task Force Co-Chair, American Civil Liberties Union; Corrine Yu, Managing Policy Director, The Leadership Conference on Civil and Human Rights; Carl Hum, Asian Americans Advancing Justice | AAJC; Zane Farr, Communications Workers of America; Carol Kaplan, NAACP; Olivia Wein, National Consumer Law Center; Irasema Garza, National Council of La Raza; and Michael Scurato, National Hispanic Media Coalition.

We thanked the Commissioner for her leadership on many issues of importance to the civil rights community, including the two topics of discussion today. We discussed the importance of expanding Lifeline to broadband considering the large number of people in the U.S. who do not subscribe at home. We encouraged the Commissioner to consider a variety of creative win-win solutions, some of which we have previously suggested in this docket (see attached filings), including:

- Strong acknowledgement of the agency of its success in cracking down on fraud and abuse in the program;
- A portable electronic benefit;
- Incentive grants to states who pursue joint enrollment and create verification databases for carriers;
- Fines and incentive payments to carriers that violate rules or achieve certain desirable benchmarks;
- Joint efforts with other federal agencies, such as the USDA, HUD, and HHS, whose federal benefit programs benefit from constituent use of Lifeline phones;
- Focus on increasing participation in the program;
- Developing a mechanism to enable Lifeline beneficiaries to use toll-free numbers airtime free so that they do not use up their limited supply of Lifeline minutes on hold with federal and state agencies;
- Adopting minimum standards for Lifeline products.

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In addition we discussed the importance of FCC improvements to data so that the media ownership Quadrennial Review can be completed with a full understanding of the impact of these rules (and proposed changes) on women and people of color.

If you would like to follow up on any of the above issues or other issues of interest to The Leadership Conference, please contact Corrine Yu, Leadership Conference Managing Policy Director at 202-466-5670 or [yu@civilrights.org](mailto:yu@civilrights.org), Gabriel Rottman at [grottman@aclu.org](mailto:grottman@aclu.org) or (202) 675-2325 or Cheryl Leanza at [cleanza@alhmail.com](mailto:cleanza@alhmail.com) or 202-904-2168.

Sincerely,

Cheryl A. Leanza  
Policy Advisor, United Church of Christ, OC Inc.  
Co-Chair, Leadership Conference on Civil and Human Rights,  
Media and Telecommunications Task Force