

December 5, 2014

VIA ELECTRONIC FILING

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

Re: WC Docket No. 11-42 – In the Matter of Lifeline and Link Up Reform and Modernization

NOTICE OF EX PARTE PRESENTATION

Dear Ms. Dortch:

On December 4, 2014, Javier Rosado, Senior Vice President, Alternative Businesses, TracFone Wireless, Inc. (TracFone), Mark Rubin, Senior Executive, Government Relations, TracFone, Stephen Athanson, Regulatory Counsel, TracFone, and undersigned counsel, met with several members of the Wireline Competition Bureau's Telecommunications Access Division. Attending from the Bureau were Jonathan Lechter, Acting Deputy Division Chief, Christopher Cook, Attorney-Advisor, and Melanie Tiano, Attorney-Advisor.

During the meeting, we discussed concerns regarding the Universal Service Administrative Company's recently-developed and implemented Lifeline Household Worksheet (also referred to as the Independent Economic Household worksheet) used in situations where multiple persons residing at the same address receive Lifeline-supported services from different providers. These concerns were raised by TracFone previously during a September 17, 2014 meeting with members of the Telecommunications Access Policy Division staff and in a September 24, 2014 ex parte letter memorializing that meeting. Specifically, we expressed a concern that the worksheet would not prevent members of the same household from receiving multiple Lifeline-supported services if the household members provided incorrect responses since there would be no means by which Lifeline providers or USAC would be able to verify whether those responses were correct. During the December 4 meeting, we notified the Telecommunications Access Policy Division that the company's concerns about increased use of the form and increased intercompany duplicate enrollment situations have been borne out by experience. Since the advent of the Lifeline Household Worksheet, TracFone has experienced an increase in the number of households required to complete the worksheet.

We discussed the need for there to be further refinements of the Commission's rules to remove the incentives and the opportunities for members of the same household to obtain multiple Lifeline services simply by providing false responses to the USAC form with no means for either Lifeline providers or for USAC to verify the accuracy of those responses. We explained that prior to the worksheet, TracFone's standard practice was to only allow one

Lifeline service per residential address. Situations in which multiple persons with the same address were claiming to be separate households were escalated and subject to further scrutiny. No specific solution to the problems following introduction of the worksheet was offered. However, we recommended that the Commission commence a further rulemaking proceeding and invite comment on various rule changes which would address the shortcomings with the USAC Household Worksheet as it is currently being used.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If there are questions, please communicate directly with undersigned counsel for TracFone.

Sincerely,



Mitchell F. Brecher

Cc: Mr. Jonathan Lechter
Mr. Christopher Cook
Ms. Melanie Tiano