

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, DC 20007

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

JOHN J. HEITMANN

EMAIL: jheitmann@kelleydrye.com

NEW YORK, NY
LOS ANGELES, CA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICE
MUMBAI, INDIA

January 21, 2015

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

Re: Notice of Oral Ex Parte Presentation; WC Docket Nos. 11-42, 09-197

Dear Ms. Dortch:

On January 16, 2015, John Heitmann and Joshua Guyan of Kelley Drye & Warren LLP, on behalf of multiple clients, met with Ryan Palmer and Jonathan Lechter (by phone) of the Wireline Competition Bureau (“Bureau”).

In the meeting, we discussed: (1) compliance plan modifications and Lifeline industry consolidation under the Bureau’s July Public Notice;¹ (2) facilitation of ETC acquisitions or customer acquisitions in the National Lifeline Accountability Database; (3) compliance plans that have been pending with the Bureau since 2012; and (4) federal ETC petitions that have been pending with the Bureau since 2010, 2011, 2012 and 2013. With respect to compliance plan modifications and Lifeline industry consolidation, we discussed possible changes that would be considered “material” and bringing individual situations and proposals to Bureau staff.

¹ See *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Lifeline Universal Service Support*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 14-1052 (rel. July 24, 2014).

KELLEY DRYE & WARREN LLP

Marlene Dortch, Secretary
January 21, 2015
Page Two

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



John J. Heitmann
Joshua Guyan
Kelley Drye & Warren LLP
3050 K Street, NW
Suite 400
Washington, DC 20007
(202) 342-8400

Counsel for Absolute Home Phones, Inc.; Aegis Telecom, Inc.; Affordable Phone Services, Inc.; Assist Wireless, LLC; Assurance Home Phone Services, Inc.; Boomerang Wireless, LLC; Blue Jay Wireless, LLC; Boomerang Wireless, LLC; Easy Telephone Services Company; Global Connection Inc. of America; Gulf Coast Home Phone Service, Inc.; Head Start Telecom, Inc.; i-wireless LLC; LTS Rocky Mount; NewPhone Wireless, L.L.C.; Pinnacle Telecommunications Group, LLC; TAG Mobile, LLC; Telrite Corporation; and TX Mobile, LLC

cc: Ryan Palmer
Jonathan Lechter