

May 8, 2015

VIA ELECTRONIC FILING

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

**Re: WC Docket No. 11-42 Lifeline and Link Up Reform and Modernization
NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch:

On May 7, 2015, Javier Rosado, Senior Vice President, TracFone Wireless, Inc. (TracFone), Mark Rubin, Senior Executive, Government Relations, TracFone, and undersigned counsel for TracFone, met with several members of the Commission staff. Attending this meeting from the Commission were Trent Harkrader, Associate Chief, Wireline Competition Bureau, Ryan Palmer, Chief, Radhika Karmarkar, Deputy Chief, Jonathan Lechter, Deputy Chief, all of the Telecommunications Access Policy Division, Wireline Competition Bureau, Jonathan Chambers, Chief, Office of Strategic Planning and Policy Analysis, Anita Patankar-Stoll, of the Office of the Managing Director, and Garnet Hanly, of the Wireless Telecommunications Bureau.

During the meeting we exchanged ideas for reforming the Lifeline program supported by the federal Universal Service Fund. Among the ideas discussed were several previously-presented TracFone proposals, including mandatory retention by Lifeline providers of Lifeline eligibility documentation, prohibiting real time in-person handset distribution, and allowing texting to be considered as usage for purposes of the Commission's rule requiring de-enrollment of Lifeline customers for 60 days' non-usage. In addition, we discussed several other Lifeline reform ideas. Those included:

- promulgating specific rules as to what constitutes sufficient personal identification information during the Lifeline enrollment process;
- utilization of systems such as the U.S. Postal Service's Coding Accuracy Support System to validate address information provided by Lifeline service applicants;
- revisions to the Universal Service Administrative Company Household Worksheet and implementation of a one-per-residential address enrollment limit subject to an appropriate individual case basis escalation process to address situations where multiple households reside at the same address;
- prohibiting agents, including independent retail vendors from having authority to make applicant eligibility/enrollment determinations;

- Ensuring greater access to federal and state databases of enrollment in Lifeline qualifying programs (a list of states where Lifeline providers have access to state eligibility databases was provided to the Commission staff. A copy of that list is enclosed herewith).

We also discussed several Lifeline reform proposals put forth by Commissioner Mignon Clyburn. These include minimum service standards, having eligibility determinations made by entities other than Lifeline providers, appropriate entry barriers and limitations, coordinated enrollment with other assistance programs, and creation of public-private partnerships to promote the availability of Lifeline service.

TracFone also wishes to bring to the Commission's attention the results of a survey recently commissioned by Keeping Americans Connected to Opportunity and conducted by ORC International. That survey, which was reported in the May 7, 2015 issue of TR Daily (p. 20), found that 67 percent of Americans 60 and older believed that older Americans are entitled to wireless Lifeline programs to which they are qualified. More importantly, 53 percent of those surveyed indicated that they would be less likely to have or use a mobile phone if they had to pay a mandatory \$5 fee to use the service.

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. Trent Harkrader
Mr. Ryan Palmer
Ms. Radhika Karmarkar
Mr. Jonathan Lechter
Mr. Jonathan Chambers
Ms. Anita Patankar-Stoll
Ms. Garnet Hanly

Enclosure

Enclosure

State Databases in use:

1. **Florida – Launch date 4/30/10 (Real time Interface)**
 - Medicaid
 - Supplemental Nutrition Asst Prog (SNAP)
 - Temp Assist to Needy Families (TANF)
2. **Maryland – Launch date 3/02/10 (White List)**
 - Medicaid (Medical Assistance)
 - Supplemental Nutrition Asst Prog (SNAP)
 - Electrical Universal Service Program
 - Temporary Cash Assistance (TANF)
 - Maryland Energy Assistance Program (EAP)
 - Public Assistance to Adults (PAA)
3. **Washington – Launch date 11/23/10 (Manual Web Service)**

MANDATORY

 - Medicaid
 - Supplemental Nutrition Asst Prog (SNAP)
 - Temp Assist to Needy Families (TANF)
 - Supplemental Security Income (SSI)
4. **Wisconsin – Launch date 3/17/11 (Manual Web Service)**

MANDATORY

 - Badger Care
 - Supplemental Nutrition Asst Prog (SNAP)
 - Low Income Home Energy Assist (LIHEAP)
 - Medicaid (Medical Assistance)
 - Supplemental Security Income (SSI)
 - WisconsinWorks (W2)
 - Temp Assist to Needy Families (TANF)
5. **Texas – Launch date 8/14/12 (API Process)**
 - Children's Health Ins Plan (CHIP)
 - Medicaid
 - Supplemental Nutrition Asst Prog (SNAP)
 - Temp Assist to Needy Families (TANF)
6. **Michigan – Launch date 11/06/12 (Batch Process)**
 - Supplemental Nutrition Asst Prog (SNAP)
 - Temp Assist to Needy Families (TANF) or Family Independence Program
7. **New York – Launch date 1/16/13 (Realtime Interface)**
 - Medicaid
 - Supplemental Nutrition Asst Prog (SNAP)
 - Low Income Home Energy Assist (LIHEAP)
 - Supplemental Security Income (SSI)
 - Temp Assist to Needy Families (TANF) or Family Assistance
 - Safety Net Assistance
8. **Oregon – Launch date 1/21/13 (Manually validated by state)**
 - Medicaid (certain Medicaid programs)
 - Supplemental Nutrition Asst Prog (SNAP)
 - Supplemental Security Income (SSI)
 - Temp Assist to Needy Families (TANF)
9. **Illinois – Launch date 5/15/13 (Manual Web Service)**
 - Medicaid (certain Medicaid programs)
 - Supplemental Nutrition Asst Prog (SNAP)
 - Temp Assist to Needy Families (TANF)
10. **Arkansas – Launch date 8/14/13 (Manual Web Service)**
 - Medicaid
 - Supplemental Nutrition Asst Prog (SNAP)
 - Temp Assist to Needy Families (TANF)
11. **Tennessee – Launch date 10/29/13 (Batch Service)**
 - Medicaid (TennCare)
 - Supplemental Nutrition Asst Prog (SNAP)
 - Temp Assist to Needy Families (TANF)
12. **West Virginia – Launch date 12/18/13 (Validated by state)**
 - Medicaid
 - Supplemental Nutrition Asst Prog (SNAP)
 - Temp Assist to Needy Families (TANF)
 - Low Income Home Energy Assist (LIHEAP)
13. **North Carolina – Launch 5/27/14 (Batch Service)**
 - Food and Nutrition Services (FNS)
 - Temp Assist to Needy Families (TANF)
 - Low Income Home Energy Assist (LIHEAP)

14. Massachusetts – Launch date 6/10/14 (Batch Service)

Service suspended 6/24 – 8/11 / Restored 8/22/14

- Supplemental Nutrition Asst Prog (SNAP)
- Temp Assist to Needy Families (TANF)

15. Maine – Launch date 11/11/14 (Batch Service)

- Medicaid
- Supplemental Nutrition Asst Prog (SNAP)
- Temp Assist to Needy Families (TANF)
- Low Income Home Energy Assist (LIHEAP)
- SSI
- National School Lunch (NSL)

16. Georgia – Launch date 1/07/15 (Batch Service)

- Medicaid
- Supplemental Nutrition Asst Prog (SNAP)
- Temp Assist to Needy Families (TANF)

17. New Jersey – Launch date 3/19/15 (Real time interface)

MANDATORY

- Medicaid
- Supplemental Nutrition Asst Prog (SNAP)
- Temp Assist to Needy Families (TANF)
- Low Income Home Energy Assist (LIHEAP)
- SSI

* *Nevada – Back to FULL Certification on 3/15/15*

Launched 10/29/13