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NOTICE OF EX PARTE

May 19, 2015

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

Re: *Lifeline and Link Up Reform and Modernization*
WC Docket No. 11-42

Dear Ms Dortch:

On Friday, May 15, 2015, Tiffany Smink and I (in person) and Caryl Gilstrap, Tom Nehls, and Al Lubeck (by telephone) met on behalf of CenturyLink with Jonathan Lechter and Greg Kwan (in person) and Garnet Hanly (by telephone) from the Wireline Competition Bureau to discuss potential changes to the Lifeline Program. The group discussed a variety of issues, including document retention requirements, modernizing Lifeline administration, and updating the Lifeline program potentially to include support for broadband internet access service.

CenturyLink encouraged the Commission to improve Lifeline administration by removing service providers from the role of determining consumers' eligibility. Moving to a centralized eligibility administrator would be more economically efficient and more convenient for Lifeline consumers, as there would be just one process for determining Lifeline eligibility and a single independent entity determining their eligibility and (to the extent necessary) retaining documentation.

CenturyLink also suggested the Commission consider adopting a more efficient and consumer-oriented voucher or debit system, which would allow discounted service from the Lifeline service provider of the consumer's choosing. Such an approach would give consumers more mobility between providers, promoting more competition among Lifeline providers, while reducing legitimate consumer worries about providing their confidential information to multiple parties. The program also could be simplified by coordinating Lifeline with administration of Supplemental Nutrition Assistance Program (SNAP) benefits by the Department of Agriculture.

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CenturyLink expressed concern about potential change to document retention rules. Under current rules, eligibility documentation is reviewed and appropriately destroyed. Requiring all Lifeline service providers to retain eligibility documentation would increase security concerns for consumers and administrative costs for providers. Proof of eligibility includes highly sensitive consumer information such as tax returns, Medicaid ID cards, SNAP cards and personal identification such as drivers' licenses and social security cards. Although CenturyLink takes all appropriate steps to safeguard consumer information, it believes the Commission should not increase risks of identity theft and consumer fraud by having the hundreds of Lifeline providers collecting and storing consumer eligibility documentation. Rather, the Commission should maintain the current documentation rules and move as quickly as possible to a third party administrator for determining eligibility. Additionally, CenturyLink emphasized that a ten-year document retention requirement is excessive and unnecessary to protect the integrity of any universal service program. The costs of administration already have made provision of Lifeline service increasingly uneconomic for many service providers.

CenturyLink encouraged the Commission to implement its previously stated policy that providers subject to the biennial audit process that had no significant findings could appropriately be relieved of the next biennial audit. CenturyLink also described how a state eligibility database is not necessarily "accessible" for a Lifeline provider if there are unreasonable upfront and/or ongoing costs to the provider to access or interface with the database.

The group also discussed whether and how the Lifeline program might be updated to support broadband Internet access service. CenturyLink supports policies to encourage broadband adoption, shared some observations about its Internet Basics broadband adoption program, and encouraged the Commission to seek public comment on whether to modernize the Lifeline program to cover broadband service, including funding issues, discount levels, and minimum service requirements if the Lifeline program were extended to broadband service.

Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this notice is being filed in the appropriate docket.

Sincerely,

/s/ John E. Benedict

Copy via email to:

Gregory Kwan
Jonathan Lechter
Garnet Hanly