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May 20, 2015

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

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

Dear Ms. Dortch:

On May 18, 2015, John Heitmann and Joshua Guyan of Kelley Drye & Warren LLP, on behalf of multiple clients listed below, met with Ryan Palmer of the Wireline Competition Bureau (“Bureau”).

In the meeting, we discussed: (1) the upcoming Lifeline item to include a Further Notice of Proposed Rulemaking regarding further reforming the Lifeline program and transitioning the program to support broadband services; (2) support for treating texting and data services as “usage” of the Lifeline-supported service; (3) Lifeline document retention, including retention of proof of eligibility and the retention period; (4) compliance plans that have been pending with the Bureau since 2012; (5) federal ETC petitions that have been pending with the Bureau since 2010, 2011, 2012 and 2013; (6) compliance plan modifications and Lifeline industry consolidation under the Bureau’s July Public Notice;<sup>1</sup> and (7) troubling recent state actions imposing 911 fees on Lifeline services.

<sup>1</sup> 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).

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Our positions on these topics were consistent with previous filings made by us on behalf of our clients in this docket.<sup>2</sup>

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

Respectfully submitted,



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cc: Ryan Palmer

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<sup>2</sup> See, e.g., Notice of Oral Ex Parte Presentation on Behalf of Multiple Clients, WC Docket Nos. 11-42, 09-197 (Dec. 9, 2014); Notice of Oral Ex Parte Presentation of Lifeline Connects Coalition, WC Docket Nos. 11-42, 09-197 (May 1, 2015); Notice of Oral Ex Parte Presentation of Lifeline Connects Coalition, WC Docket Nos. 11-42, 09-197 (May 4, 2015); Reply Comments of the Lifeline Reform 2.0 Coalition on TracFone Emergency Petition for Declaratory Ruling, WC Docket No. 11-42 (Dec. 23, 2014) (supporting TracFone's petition regarding state 911 fees imposed on Lifeline services).