

June 1, 2015

**VIA ELECTRONIC FILING**

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

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

Dear Ms. Dortch:

On June 1, 2015, Mark Rubin, Senior Executive – Government Affairs, TracFone Wireless, Inc., and undersigned counsel met with Nicholas Degani, Legal Advisor to Commission Ajit Pai and with Trey O’Callaghan, a legal intern in Commissioner Pai’s office. During the meeting we discussed the Lifeline program supported by the federal Universal Service Fund, including certain matters addressed in Commissioner Pai’s May 12, 2015 testimony before the Senate Appropriations Committee Subcommittee on Financial Service and General Government. Specifically, we noted that the Commissioner’s stated concerns about growth in the Lifeline program since 2008 failed to acknowledge the fact that the program had been historically utilized prior to the advent of wireless Lifeline services and that much of the growth in the program merely brought Lifeline participation closer to that of other federal support programs. We also discussed the lack of any evidentiary correlation between mandatory minimum charges for Lifeline service and fraudulent enrollment.

In addition, we discussed some of the ideas which may be raised in the forthcoming Lifeline reform proceeding soon to be commenced, including minimum service standards, use of third parties for Lifeline enrollment and eligibility verification, allowing entities to participate in the program without being designated as Eligible Telecommunications Carriers, and whether/how to expand the Lifeline program to provide support for broadband services.

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 Wireless, Inc.

Sincerely,

  
Mitchell F. Brecher

Cc: Mr. Nicholas Degani  
Mr. Trey O’Callaghan