



**Competitive Carriers Association**  
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June 10, 2015

**Via ECFS**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RE: EX PARTE NOTICE**

**WC Docket No. 11-42:** *Lifeline and Link Up Reform and Modernization*  
**WC Docket No. 10-90:** *Connect America Fund*  
**WT Docket No. 10-208:** *Mobility Fund*

Dear Ms. Dortch:

On Monday, June 8, 2015, Steven K. Berry, C. Sean Spivey and I, on behalf of Competitive Carriers Association (CCA), met with Daniel Alvarez, Legal Advisor to Chairman Wheeler, Trent Harkrader, Associate Bureau Chief of the Wireline Competition Bureau, and Ryan Palmer, Division Chief of the Telecommunications Access Policy Division of the Wireline Competition Bureau, to discuss the Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order related to proposed Lifeline reforms.

Specifically, the participants discussed the purpose of the Commission's Lifeline program and its overriding objectives.<sup>1</sup> Several CCA members offer service to low-income Americans through the Lifeline program. CCA and its members support efforts to restructure the Lifeline program to meet today's most pressing communications needs, including providing low-income consumers affordable access to broadband, as long as the Commission does not abandon support for voice services—especially in rural areas—and these changes are not made at the expense of other USF programs.

Relatedly, CCA members that serve rural communities continue to be concerned about uncertainty regarding available high-cost universal service support for operating, upgrading, and expanding wireless networks in rural areas.<sup>2</sup> USF support for mobile wireless service is critical to facilitating investment, which promotes competition and broadens the number of providers who can

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<sup>1</sup> See 47 U.S.C. § 254(b)(1), (3) (requiring the Commission to adopt universal service policies based on the principles that services be available at “affordable rates” and that “consumers in all regions of the nation, including low-income consumers and those in rural, insular, and high cost areas, should have access to telecommunications and information services . . .”).

<sup>2</sup> See, e.g., *Ex Parte* Letter from Steven K. Berry, President & CEO, CCA to Marlene H. Dortch, Secretary, FCC, GN Docket No. 14-28 (filed Feb. 5, 2015).

offer services through the Lifeline program. CCA opined that any changes to the Lifeline program should not negatively impact the Commission's mechanisms that today provide critical support to our nation's rural areas, schools, libraries, and health care providers, or its ability to offer robust support for Phase II of the high-cost Mobility Fund.

CCA also expressed support to increase carrier participation in this program, and to promote competition in the service offerings carriers provide to Lifeline subscribers. If the FCC establishes minimum service standards for both voice and broadband Lifeline programs to accomplish these goals, CCA cautioned the FCC to take into account technology, geography and other differentiating factors. CCA looks forward to working with the Commission as it continues to modernize and reform this vital universal service program.

This *ex parte* notification is being filed electronically with your office pursuant to Section 1.1206 of the Commission's Rules.

Sincerely,

*/s/ Rebecca Murphy Thompson*

Rebecca Murphy Thompson  
General Counsel

cc: Daniel Alvarez  
Trent Harkrader  
Ryan Palmer  
Louis Peraertz  
Priscilla Delgado Argeris  
Brendan Carr  
Erin McGrath