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June 10, 2015

Ex Parte

Ms. 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 June 8, 2015, David Haga and Alan Buzacott of Verizon met separately with Daniel Alvarez of Chairman Wheeler's office, Amy Bender and Trip Nistico of Commissioner O'Rielly's office, and Matthew Berry and Trey O'Callaghan of Commissioner Pai's office. Alan Buzacott of Verizon also met with Travis Litman of Commissioner Rosenworcel's office.

In the meetings, we discussed a provision in the Lifeline order under consideration that would require carriers to retain copies of eligibility documentation presented by Lifeline applicants. We explained that implementing the eligibility document retention requirement would take Verizon several months and impose information technology and training costs. We asked that if the Commission intends to go forward with the document retention proposal it consider implementing any new requirement in connection with other changes under consideration in the companion Notice of Proposed Rulemaking (NPRM) that seeks comment on larger changes to the eligibility verification process. In the NPRM the Commission should consider all options for eligibility verification, including a hybrid system that would allow carriers to elect whether to rely on a third-party to make eligibility determinations or perform this function themselves under appropriate circumstances.

Sincerely,

/s/ Alan Buzacott

cc: Daniel Alvarez
Amy Bender
Trip Nistico
Matthew Berry
Trey O'Callaghan
Travis Litman