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NOTICE OF EX PARTE

June 10, 2015

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

Re: *In the Matter of Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On June 9, 2015, Tiffany Smink, Jeb Benedict and Melissa Newman of CenturyLink met in separate meetings with Dan Alvarez of the office of Chairman Tom Wheeler, with Amy Bender of the office of Commissioner Michael O'Rielly, with Nick Degani of the office of Commissioner Ajit Pai, with Rebekah Goodheart of the office of Commissioner Mignon Clyburn, and with Travis Litman of the office of Commissioner Jessica Rosenworcel, to discuss the above-captioned proceedings. Trey O'Callaghan, an FCC intern, also attended the meeting with Nick Degani.

In each of these meetings, 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 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

Ms. Marlene H. Dortch
June 10, 2015

Page 2 of 2

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 some major carriers.

CenturyLink has previously advocated that 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 SNAP benefits by the Department of Agriculture.

CenturyLink has previously 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.

Also, CenturyLink has previously discussed whether and how the Lifeline program might be updated to support broadband Internet access service. CenturyLink supported 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.

Sincerely,

/s/ Melissa Newman

Copy via email to:
Dan Alvarez
Amy Bender
Nick Degani
Rebekah Goodheart
Travis Litman
Trey O'Callaghan