



July 8, 2015

Ex Parte Notice

Ms. Marlene 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); Telecommunications Carriers Eligible for Universal Service Support (WC Docket No. 09-197); Connect America Fund (WC Docket No. 10-90)

On Monday, July 6, 2015 the undersigned on behalf of GVNW Consulting, Inc.¹ along with Jeff Smith of GVNW and Brian Ford of NTCA–The Rural Broadband Association² met with Rebekah Goodheart, Legal Advisor from the office of Commissioner Mignon Clyburn. The parties discussed proposals contained in the Federal Communications Commission’s (“Commission”) Second Further Notice of Proposed Rulemaking (“FNPRM”) that addressed reform of universal service Lifeline Support.³

The discussion focused on how to operationalize Commissioner Clyburn’s second principle for reforming Lifeline support⁴ -- “providers should no longer be responsible for determining

¹GVNW Consulting, Inc. is a management consulting firm that provides a wide variety of consulting services, including regulatory and advocacy support on issues such as universal service, intercarrier compensation reform, and strategic planning for communications carriers in rural America.

²NTCA represents nearly 900 rural rate-of-return regulated telecommunications providers (“RLECs”) providing service in 46 states. All of NTCA’s RLEC members are full service local exchange carriers and broadband providers, and many of its members provide wireless, cable, satellite, and long distance and other competitive services to their communities.

³ *In the Matter of Lifeline and Link Up Reform and Modernization* (WC Docket No. 11-42, Telecommunications Carriers Eligible for Universal Service Support (WC Docket no. 09-197, Connect America Fund (WC Docket No. 10-90), (rel. June 22, 2015).

⁴ See speech of Commissioner Mignon Clyburn “Reforming Lifeline for the Broadband Era” at the American Enterprise Institute at page 5, Nov. 12, 2014.

customer eligibility” in the context of the various proposals in the FNPRM to determine eligibility and perform verification of continued eligibility. We also discussed standards for broadband service that would be eligible for Lifeline support and how support would be allocated to voice and broadband services, whether offered separately or bundled.

Sincerely,

/s/ David B. Cohen

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