

September 18, 2015

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

**Re: *Ex Parte* Notification
WC Docket No. 11-42**

Dear Ms. Dortch:

On behalf of Smith Bagley, Inc. (“SBI”), undersigned counsel held a conference call on September 16, 2015 with Jay Schwarz, Deputy Division Chief of the Telecommunications Access Policy Division, Jodie Griffin, Attorney Advisor, and Christian Hoefly and Nathan Eagan, Law Clerk Trainees at the Wireline Competition Bureau.

During the call, counsel discussed the recently adopted rule – currently undergoing Paperwork Reduction Act review – that will require Lifeline providers to retain copies of customer eligibility and identity verification documents and to implement specific privacy and data protection measures. We emphasized that the new requirements will require SBI to make substantial equipment purchases and system upgrades, as well as overhaul company procedures and employee training.

Because this represents a significant time commitment, particularly for a small business, we requested that the FCC provide a transition period whereby carriers would be required to comply with the new rule 180 days after publication of OMB approval in the Federal Register. We noted that this is the same transition period that is being provided for the uniform snapshot date for reporting customers on Form 497, and that the new document retention and data security requirements are no less burdensome or time-intensive.

Hon. Marlene H. Dortch
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Please contact the undersigned if you have any questions.

Sincerely,



David A. LaFuria
Steven M. Chernoff

Counsel for Smith Bagley, Inc.

cc (via e-mail):

Jay Schwarz
Jodie Griffin
Christian Hoefly
Nathan Egan