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October 13, 2015

VIA ECFS

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

Re: Notice of *Ex Parte* Presentation, TruConnect
Lifeline and Link Up Reform and Modernization, et al.
WC Docket Nos. 11-42, 09-197 and 10-90

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, the undersigned counsel hereby provides notice of the following presentations by TruConnect ("TruConnect")¹ concerning the Second Further Notice of Proposed Rulemaking seeking comment on proposals to modernize and restructure the Lifeline program.² On Wednesday, October 7, 2015, TruConnect met with Travis Litman, Senior Legal Advisor to Commissioner Jessica Rosenworcel. In attendance on behalf of TruConnect were Steven A. Augustino of Kelley Drye & Warren LLP and Robert Yap, Chief Legal Officer of TruConnect.

During the meeting, TruConnect discussed its support for expanding the Lifeline program to include broadband services. TruConnect also discussed its history of providing

¹ TruConnect is the common brand name used by affiliated companies Telscape Communications, Inc., Sage Telecom Communications, LLC and TruConnect Mobile, Inc.

² See *In the Matter of Lifeline and Link Up Reform and Modernization, et al.*, WC Docket 11-42, et al., Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. June 22, 2015) ("Second FNPRM").

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broadband services to lower-income consumers, and discussed the broadband services that are provided to Lifeline wireless subscribers in California because of the additional state subsidy. TruConnect also described its Internet-On-The-Go prepaid personal hotspot offered at WalMart stores, which could be offered as an option to Lifeline subscribers if the Lifeline program is expanded to cover broadband services. TruConnect indicated, however, that it will not be possible to offer a significant amount of broadband in addition to voice/text service at the current support level of \$9.25 per month. As such, low-income consumers are likely to face a choice between a handset that is primarily used for voice/text or a hotspot device that provides monthly data but not voice. TruConnect recommended that the FCC provide additional subsidies and/or greater predictability in a customer's initial term of service in order to promote more robust broadband offerings to Lifeline consumers.

In addition, TruConnect discussed the long-pending petition it filed (under Sage Telecom Communications) for designation as an ETC in the federal default states. TruConnect asked the Commission to give prompt consideration to that petition in order to promote additional competition in the applicable states. Finally, TruConnect asked the Commission to provide further guidance on the process and timing for obtaining approval for transactions involving Lifeline ETCs. TruConnect expressed its view that consolidation would benefit consumers and the program by enabling more ETCs to gain the scale that will facilitate compliance with program rules and can enable more robust service plans.

The attached handout providing background on TruConnect was distributed at the meeting.

Sincerely,



Steven A. Augustino

Counsel for TruConnect

cc: T. Litman