



1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000

www.wileyrein.com

November 10, 2015

Shawn H. Chang
(202)719-4456
schang@wileyrein.com

VIA ELECTRONIC FILING

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

**Re: WC Docket No. 11-42 Lifeline and Link Up Reform and Modernization
NOTICE OF EX PARTE PRESENTATION**

Dear Ms. Dortch:

On November 9, 2015, F.J. Pollak, President and Chief Executive Officer, TracFone Wireless, Inc. (TracFone), Javier Rosado, Senior Vice President, Alternative Businesses, TracFone, Mark Rubin, Senior Executive, Government Relations, TracFone, and undersigned counsel met with Commissioner Mignon Clyburn and with Rebekah Goodheart, Legal Advisor – Wireline.

During the meeting, we discussed various issues before the Commission in the pending notice of proposed rulemaking in the above-captioned proceeding. We explained TracFone's desire to be a partner of the Commission as it considers various proposals to reform and modernize the program. We reiterated TracFone's support of the Commission's goals of increasing participation, promoting competition, and safeguarding the program from waste, fraud, and abuse. Specific issues discussed included the following:

- TracFone's proposal to make broadband available to Lifeline households by requiring wireless Lifeline providers to offer at no charge to qualified consumers Wi-Fi-enabled smartphones that could utilize free Wi-Fi hotspots provided through public facilities;
- TracFone's support for a third party eligibility verifier;
- The reasons why implementation of a direct benefit transfer ("voucher") system along the form of a Supplemental Nutrition Assistance Program ("SNAP") debit card for Lifeline would discourage Lifeline participation by unduly burdening consumers through the need for monthly transactions in-person or over the phone; why qualified Lifeline customers cannot all be

Ms. Marlene H. Dortch

November 10, 2015

Page 2

expected to have access to the Internet and conduct those transactions online; why an automated electronic debit system in the form of vouchers defeats the stated goals of using vouchers to increase portability and encourage consumer choice while imposing additional transactional costs; and how TracFone has proposed an “enhanced” National Lifeline Accountability Database (NLAD) solution that would eliminate the need for Lifeline customers to de-enroll then re-enroll in the program when switching providers, thus advancing the goal of increasing the portability of Lifeline benefit for consumers;

- Why Lifeline eligibility should not be limited to a single qualifying program such as the SNAP and how states should be incentivized to create their own databases that would encompass, at a minimum, participant data for verification purposes from SNAP, Medicaid, SSI, and Temporary Assistance for Needy Family (TANF) programs ;
- Why proposals to require minimum quantities of voice telephony usage for wireless Lifeline services could eliminate no charge Lifeline services which have proven popular with millions of low-income households and would make Lifeline unaffordable to many currently-enrolled low-income households; and
- How any requirement changes to the existing process designating an entity as an eligible telecommunications carrier (ETC) for the purpose of receiving support from the Universal Service Fund for providing Lifeline service must be applied equally and uniformly between new entrants and existing ETCs.

Pursuant to Section 1.1206(b) of the Commission’s rules, this letter is being filed electronically. If there are questions, please communicate directly with undersigned counsel for TracFone.

Sincerely,



Shawn H. Chang*



Ms. Marlene H. Dortch
November 10, 2015
Page 3

Cc: Hon. Mignon Clyburn
Ms. Rebekah Goodheart

*Admitted in Maryland, District of Columbia application pending