Alan Buzacott
Executive Director
Federal Regulatory Affairs

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1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2595
Fax 202 336-7922
alan.buzacott@verizon.com

Ex Parte

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

Re: Lifeline and Link-Up Reform and Modernization, WC Docket No. 11-42

Dear Ms. Dortch:

On November 18, 2015, David Haga and Alan Buzacott of Verizon met with Ryan Palmer, Trent Harkrader, Jay Schwarz, and Chas Eberle of the Wireline Competition Bureau; Jon Chambers of the Office of Strategic Planning and Policy Analysis; and Eric Feigenbaum of the Office of Media Relations to discuss the *Second Further Notice of Proposed Rulemaking* (*FNPRM)* in the above-captioned proceeding.

In the meeting, we discussed the benefits of an optional national verifier to process eligibility paperwork and to qualify beneficiaries. We explained that an optional national verifier would reduce the burden on customers and carriers alike, and improve the efficiency of the program.

We also explained that, if the Commission moves forward with Lifeline funding for broadband, it should begin by giving carriers the option of providing a Lifeline discount on standalone broadband service. If the Commission requires carriers to offer a Lifeline discount on broadband, the Commission should make clear that the carrier can meet its obligation by offering Lifeline on an existing broadband service, and need not offer Lifeline on all existing broadband offerings. We further explained that carriers should be permitted to follow the same credit policies, including service deposit policies, for Lifeline customers as for other customers.

The Commission should limit the impact of any changes in the program on fund size by adopting its tentative conclusion to keep the federal benefit amount at $9.25 per household per month. The Commission should also put in place a tool that would allow it to track changes in the fund size and take action if the fund size increases significantly.

Finally, we pointed out that several proposals in the *FNPRM* would only add complexity and cost to the program. In particular, we explained that the proposal to require all company employees interfacing with consumers to provide a training verification would apparently cover several thousand Verizon employees. We also explained that the proposal to mandate 24-hour call center access would be both costly and unnecessary, given that carriers that provide Lifeline service on a post-paid basis already provide several means for customers to contact the carrier. Similarly, the proposal to require applicants to provide photo ID does not serve any purpose for carriers that process applications submitted by mail.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's rules. Please contact me if you have any questions.

Sincerely,

cc: Ryan Palmer
Jon Chambers
Trent Harkrader
Chas Eberle
Jay Schwarz
Eric Feigenbaum