

December 9, 2015

VIA ECFS

EX PARTE NOTICE

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

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

Dear Ms. Dortch,

On December 7, 2015, Angie Kronenberg and the undersigned counsel from INCOMPAS met with Gigi Sohn of the Office of the Chairman, Jonathan Chambers of the Office of Strategic Planning & Policy Analysis, and Trent Harkrader, Jay Schwarz, Garnet Hanly, Charles Eberle, Nathan Eagan, Jodie Griffin and Christian Hoefly of the Wireline Competition Bureau, to discuss the Second Further Notice of Proposed Rulemaking in the above-referenced docket.

During the meeting, we commended the Commission's proposal to include broadband service in the Lifeline program. We also advocated for Lifeline reforms that increase consumer choice and service provider participation. Specifically, we urged the Commission to refrain from setting mandatory minimum service standards in favor of reforms that allow customers to choose an optimal mix of voice, broadband, or bundled services based on their own understanding of their individual or household needs. The application of minimum standards, either for voice or broadband service, could have the unintended effect of limiting consumer choice among affordable options and/or discouraging providers from participating in the program, and as we discussed in our Comments, competition in the Lifeline program has improved service options for participating consumers. In fact, competitive forces have led Lifeline carriers to nearly triple the number of minutes provided from 90 minutes to 250 minutes and to add a wide variety of service packages and features, such as nationwide calling and rollover of unused minutes.¹

We also expressed support for the Commission's proposal to transfer responsibility for determining subscriber eligibility from eligible telecommunications carriers ("ETCs") to a national Lifeline eligibility verifier ("national verifier"). Lifeline providers are already providing

¹ See COMPTTEL Comments in WC Docket No. 11-42, *et al.*, at 8 (Aug. 31, 2015).

real-time eligibility verification in a single transaction, and the Commission should ensure that a national verifier retains this capacity when processing applications. To that end, the Commission should consider reducing the number of state and federal programs it relies on to determine eligibility to existing state Lifeline databases, SNAP, SSI, Medicaid and Tribal programs.

Finally, INCOMPAS encouraged the Commission to streamline the ETC designation process in order to encourage provider participation in Lifeline. The Commission should work with states to develop straightforward and nationally-acceptable standards for obtaining ETC designation that are based solely on the statutory criteria in 47 U.S.C. § 214(e)(1) and eliminate any extraneous requirements that might otherwise deter entry into the program. Furthermore, in order to increase competition and participation in the program, the Wireline Competition Bureau should resume approvals of pending ETC compliance plans without awaiting a final order in this proceeding.

Please do not hesitate to contact me if you have questions about this submission.

Respectfully submitted,

/s/ Christopher L. Shipley

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