



December 17, 2015

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of ex parte presentations – Universal Service Reform, Mobility Fund Phase II, CAF Phase II, and Lifeline Reform (WC Docket Nos. 10-90, 11-42, and 10-208)

Dear Ms. Dortch:

On December 15-16, 2015, CTIA® met with the various Commission offices regarding universal service reform issues including Connect America Fund ("CAF") Phase II, Mobility Fund Phase II, and Lifeline, in the above-referenced proceedings. A complete list of meeting participants is attached.

In the meetings, CTIA discussed the wireless industry's support for universal service goals and policies through an efficient and effectively managed federal universal service program ("USF"). CTIA believes USF support, particularly in the high-cost and low-income programs, should be directed towards the services that reflect consumer demand. In most cases, consumers are migrating towards mobile wireless services to meet communication, educational and occupational needs.

CTIA also noted that, as the largest industry contributor to the federal USF (estimated at over \$1 billion next quarter), the wireless industry is committed to supporting universal service programs that make efficient use of scarce public resources. For this reason, CTIA believes that the Commission should prioritize funding for the most effective and efficient solutions, such as mobile wireless services.

With regard to reforms to the specific universal service programs, CTIA made the following arguments:

CAF Phase II Competitive Bidding

CTIA argued that the Commission should adopt technologically and competitively neutral service standards and criteria for bidder participation, and ensure that the



process encourages the use of efficient technologies to serve high-cost areas. A narrow focus on fiber technologies would most likely result in inefficient distribution of high-cost support.

Specifically, CTIA advocated for a competitive and technology neutral CAF II program that will be more likely to meet rural consumer demand, especially as consumers are increasingly adopting wireless communications to meet their diverse needs. For the same reason, CTIA argued that the Commission should adopt service standards and bidding criteria that recognize both the efficiency of wireless networks in certain locations, as well as consumer demand for wireless services. For example, if the Commission establishes the service standards too high, then the Commission will limit the ability of rural consumers to receive the most efficient and effective services.

Mobility Fund Phase II

CTIA encouraged the Commission to move ahead with implementation of Mobility Fund Phase II to bring rural Americans access to wireless services who currently lack such access. CTIA urged the Commission to retain its commitment to provide at least \$500 million per year in Mobility Fund support, given that rural consumers should have opportunities to benefit from wireless technologies where they live, work and travel.

Lifeline

CTIA asserted that wireless is essential to the success of the Lifeline program, and noted that low-income consumers overwhelmingly choose wireless services. Wireless providers want an efficient and effective Lifeline program through improved eligibility and enrollment administration. CTIA noted that eligible low income consumers should have choice and control over the mobile wireless services that meet their needs, rather than the Commission choosing for them.

This letter is submitted consistent with the Commission's ex parte rules.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann
Vice President
Regulatory Affairs

cc: Amy Bender
Brendan Carr
Nicholas Degani
Rebekah Goodheart
Travis Litman



Erin McGrath
Louis Peraertz
Edward "Smitty" Smith
Stephanie Weiner



Attachment

December 15-16, 2015 Meeting Participants

CTIA®

Scott Bergmann, Vice President, Regulatory Affairs*
Krista Witanowski, Assistant Vice President, Regulatory Affairs
Matthew Gerst, Director, Regulatory Affairs
Charles Keller, Partner of Wilkinson Barker Knauer, LLP (on behalf of CTIA)

Office of Commissioner Rosenworcel:

Travis Litman, Senior Legal Advisor

Office of Commissioner O’Rielly:

Amy Bender, Legal Advisor, Wireline
Erin McGrath, Legal Advisor, Wireless, Public Safety and International

Office of Commissioner Pai:

Brendan Carr, Legal Advisor, Wireless, Public Safety, and International
Nicholas Degani, Legal Advisor, Wireline

Office of Commissioner Clyburn:

Louis Peraertz, Senior Legal Advisor, Wireless, International, and Public Safety
Rebekah Goodheart, Legal Advisor, Wireline

Office of Chairman Wheeler:

Edward “Smitty” Smith, Legal Advisor, Wireless, Engineering and Technology, Consumer Affairs, and Incentive Auction
Stephanie Weiner, Senior Legal Advisor, Wireline

*Only attended meetings in the Offices of Chairman Wheeler, Commissioner Clyburn and Commissioner Rosenworcel.