

January 22, 2016

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

Re: *Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42*
Telecommunications Carriers Eligible for Universal Service Support, WC Docket
No. 09-197
Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On January 20, 2016, Elaine Divelbliss and Norina Moy of Sprint Corporation (“Sprint”), along with Traci Biswese and the undersigned of this firm, met with Trent Harkrader, Jay Schwartz and Charles Eberle of the Federal Communications Commission’s (“Commission” or “FCC”) Wireline Competition Bureau (“WCB”) to discuss the above-captioned proceedings.

The attendees discussed the proposals by AT&T to adopt a Lifeline voucher system and to limit eligibility to participation in the SNAP program. Sprint expressed its concerns with these proposals, explaining to the WCB staff that direct transfers of Lifeline benefits to consumers would unnecessarily shift substantial administrative burdens from providers to Lifeline consumers. For many Lifeline beneficiaries, this additional burden could make it very difficult to maintain continuous wireless service; would have the effect of denying them meaningful access to their Lifeline benefit; and could impose a financial burden if the end users are charged fees by third parties for transactions using SNAP-like debit cards (those fees, even if low, could easily offset much of the \$9.25 monthly Lifeline benefit). Sprint also noted that the voucher approach could increase waste, fraud and abuse in the Lifeline program, and would result in significant costs by whatever entity is made responsible for administering a voucher program. Finally, Sprint noted that limiting Lifeline eligibility only to SNAP participants could lock out very large numbers of end users who qualify under other criteria.

Sprint explained that it supports adoption of a third party verifier and encouraged staff to build in a degree of flexibility to allow carriers to continue to perform certain functions, such as recertification, where carriers have established customer-friendly and customer-familiar processes. Sprint also encouraged staff to adopt a timeframe for any transition to a third party verifier that includes ample time for testing before final implementation.

Finally, Sprint urged the Commission to avoid adopting minimum service standards. In Sprint’s view, the better course is to continue to encourage robust competition, as market forces will cause providers to offer Lifeline customers more minutes, data, and text in order to compete for their business. By contrast, minimum service standards may cause Lifeline carriers to pass

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increased charges to end users, which could make the service unaffordable to highly cost-sensitive Lifeline customers.

If you have any questions, please do not hesitate to contact me at (202) 730-1346, or bstrandberg@hwglaw.com.

Respectfully submitted,

/s/ Brita D. Strandberg

Brita D. Strandberg
Counsel to Sprint Corporation

Cc: Charles Eberle
Trent Harkrader
Jay Schwartz