February 4, 2016

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20554

Re: Telecommunications Carriers Eligible for Universal Service Support; Petition of Boost Mobile for Limited Designation As An Eligible Telecommunications Carrier in Alabama, Connecticut, Delaware, Florida, Maine, New Hampshire, North Carolina, New York, Tennessee, Texas, Virginia, and the District of Columbia, WC Docket No. 09-197
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42
Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

On February 2, 2016, Elaine Divelbliss and I of Sprint Corporation met with Stephanie Weiner of Chairman Wheeler's office, and Jay Schwarz of the Wireline Competition Bureau, to discuss two aspects of Lifeline service. First, we requested that the Commission grant a petition filed by Sprint's affiliate Boost Mobile for designation as an Eligible Telecommunications Carrier for the limited purpose of providing Lifeline service in Alabama, Connecticut, Delaware, Florida, Maine, New Hampshire, North Carolina, New York, Tennessee, Texas, Virginia, and the District of Columbia. We explained that Boost is seeking to offer the Lifeline benefit to its eligible prepaid subscribers; that Boost is a facilities-based carrier which offers extremely competitive voice and data calling plans; and that Boost is very familiar with the federal requirements associated with the provision of Lifeline service.

Second, we discussed three proposals that have been raised in the Lifeline Reform proceedings. Sprint's comments on each of these proposals were consistent with its previous filings in these dockets:[1]

- Voucher proposal: We explained that the so-called "voucher" system for providing the Lifeline benefit directly to end users was likely to be extremely burdensome to Lifeline subscribers; could increase the incidence of waste, fraud and abuse; and would involve significant administrative expense.
- SNAP-only proposal: We explained that limiting Lifeline eligibility only to participation in SNAP could potentially disqualify approximately one-third of currently eligible subscribers and would thus be contrary to the public interest.
- Minimum broadband standards: If the Lifeline program is expanded to include broadband service, we noted that the Commission could and should rely upon market forces to determine the parameters of such service. We expressed concern that excessive

[1] *See, e.g.*, Sprint's comments filed August 31, 2015 and reply comments filed Sept. 30, 2015 in the above-referenced proceedings.

performance standards will necessitate an end user out-of-pocket co-pay, which could have a direct adverse effect upon consumer and carrier participation.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433-4503.

Sincerely,

/s/ Norina T. Moy

Norina T. Moy
Director, Government Affairs

c: Stephanie Weiner
Jay Schwarz