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**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
12<sup>th</sup> Street Lobby – TW A325  
Washington, DC 20554

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

Dear Ms. Dortch:

On February 26, 2016, Hank Hultquist, Mary Henze, and the undersigned of AT&T Services, Inc. met with Richard Mallen, Linda Oliver, Marcus Maher of the Office of the General Counsel, Jon Wilkins of the Office of Managing Director, Stephanie Weiner of the Office of the Chairman, and Jodie Griffin and Matt DelNero of the Wireline Competition Bureau to discuss the Second Further Notice of Proposed Rulemaking (FNPRM) in the above referenced docket.

The purpose of the meeting was to discuss proposals to further reform and modernize the Lifeline program. We discussed the legal support for replacement or modification of the current ETC designation process for Lifeline providers, both for broadband and existing voice services. In particular, we noted that to the extent that 47 U.S.C. 254(e) even applies to USF funds other than high cost funds, 254(h) and (j) call out two different affordability programs – E-rate and Lifeline – that provide an exemption from any requirement that USF funds be distributed only to ETCs.

The Commission has administered a Lifeline program since 1985 pursuant to its general authority under sections 1, 4(i), 201, and 205 of the Act, and under Section 254(j), it retains the ability to distribute funds for Lifeline irrespective of the other subsections of section 254.

We urged the Commission to implement reforms to its Lifeline program in order to attract broader participation by service providers. We observed that the Commission could do so without pre-empting state authority to designate ETCs for the receipt of support for the provision, maintenance, and upgrading of facilities and services. We recommended that the Commission instead adopt the following reforms: (1) establish uniform, nationwide standards and requirements for participation by service providers in Lifeline; (2) make participation

voluntary by ETCs in any expanded Lifeline program that allows eligible customers to purchase broadband services at a discount; and (3) open up participation in any such expanded Lifeline program on a voluntary basis to non-ETCs to the extent that they meet the same uniform, nationwide standards and requirements.

In accordance with section 1.1206(b) (2) of the Commission's rules, this letter is being filed electronically with your office. Please feel free to contact me if you have any questions.

Respectfully submitted,

/s/ Linda Hood

Vice President and Associate General Counsel  
AT&T Services, Inc.

CC: Richard Mallen  
Linda Oliver  
Marcus Maher  
Jon Wilkins  
Stephanie Weiner  
Jodie Griffin  
Matt DelNero