



March 9, 2016

**VIA ECFS**

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

Re: *Notice of Ex Parte Presentations  
Lifeline and Link Up Reform and Modernization (WC Docket  
No. 11-42); Lifeline and Link Up, (WC Docket No. 03-109)*

Dear Ms. Dortch:

On March 7, 2016, CTIA met with staff of the Wireline Competition Bureau and the Office of Chairman Wheeler to discuss the Commission's effort to modernize the Lifeline program in the above referenced dockets. CTIA met separately with Stephanie Weiner, Gigi Sohn, and Eric Feigenbaum of the Office of Chairman Wheeler, and Trent Harkrader, Ryan Palmer, and Charles Eberle of the Wireline Competition Bureau. CTIA was represented by Matthew Gerst, Director, Regulatory Affairs, Krista Witanowski, Assistant Vice President, Regulatory Affairs, and L. Charles Keller of Wilkinson Barker Knauer, LLP. Scott Bergmann, Vice President, Regulatory Affairs, also joined the meeting with the Chairman's Office.

In the meetings, CTIA expressed its support for the Commission's efforts to reform the Lifeline program to support mobile wireless broadband services and to improve the administration of the Lifeline program. CTIA highlighted the contribution that mobile wireless providers have made to the Lifeline program, including significantly increasing the utility and value of the program for millions of low-income consumers.

With regard to minimum Lifeline service standards, CTIA stated that affordability for low-income consumers should be the primary basis for determining the minimum offerings for Lifeline-supported services. Using today's mobile wireless service offerings as a starting point, Lifeline minimum service



standards should be set at levels that will place 21<sup>st</sup> Century mobile wireless services within reach for low-income consumers.<sup>1</sup>

We noted that minimum service standards established at levels that do not reflect market realities for mobile wireless voice or broadband offerings will raise significant barriers to participation for millions of low-income consumers. CTIA urged the Commission to ensure that the potential reforms to the program do not cause significant disruption to current base of Lifeline customers who rely on mobile wireless voice services for their economic, educational and public safety needs.

This letter is filed consistent with the Commission's ex parte rules. Please direct any questions regarding this filing to the undersigned.

Sincerely,

*/s/ Matthew Gerst*

Matthew Gerst  
Director  
Regulatory Affairs

cc: Gigi Sohn  
Stephanie Wiener  
Eric Feigenbaum  
Trent Harkrader  
Ryan Palmer  
Charles Eberle

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<sup>1</sup> See, e.g., Letter from Norina T. Moy, Sprint, to Marlene H. Dortch, FCC, WC Docket Nos 11-42 *et al.* (filed March 2, 2016); Letter from Mitchell F. Bretcher, counsel to TracFone, WC Docket No. 11-42 (filed March 2, 2016).