

March 16, 2016

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

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

Dear Ms. Dortch:

Voxiva, Inc. (“Voxiva”) hereby provides a summary of meetings that took place on March 15, 2016 between Paul Meyer, Voxiva Chairman and Co-CEO, Justin Sims, Voxiva President and Co-CEO, Patrick Halley of Wilkinson Barker Knauer, LLP, Voxiva’s regulatory counsel, and FCC staff. FCC participants in the first meeting were Gigi Sohn, Stephanie Weiner, Jamile Kadre, and Anthony Jones of Chairman Wheeler’s office and Trent Harkrader of the Wireline Competition Bureau. Separately, we met with Travis Litman of Commissioner Rosenworcel’s office.

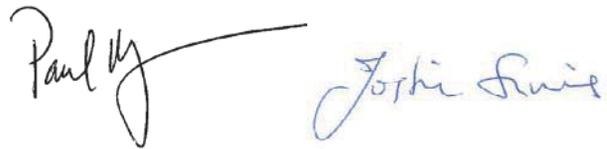
During both meetings the following points were made:

1. Lifeline mobile service has become a critical tool for the nation’s Medicaid program to reach and engage Medicaid beneficiaries and improve health outcomes.
2. With a mobile phone, Medicaid beneficiaries can talk to their health care providers, case managers, and health plans. They can access the digital health services delivered via text and apps that have been proven to improve health outcomes.
3. Whereas mobile phone delivered text messages are clinically proven to improve health outcomes, home broadband service alone does not help the Medicaid program achieve its goals.
4. Medicaid populations are very transient and hundreds of thousands are homeless. Homeless beneficiaries are among the sickest, neediest and costliest beneficiaries to serve and they have no home at which to install fixed broadband.
5. Voxiva wants to be sure that under the new rules, Medicaid can continue to leverage Lifeline wireless service.
6. Voxiva is concerned that the imposition of minimum requirements for unlimited voice and significant broadband minimum service requirements will make it uneconomical for Lifeline carriers to offer any mobile service bundles without a co-pay.
7. If a co-pay is required, many of the most vulnerable Medicaid beneficiaries will not be able to benefit from Lifeline at all.

8. Moreover, in many states Medicaid health plans are legally prohibited from promoting any services that involves a co-pay for their beneficiaries.
9. If the Medicaid program cannot leverage Lifeline service to help achieve its goals, there is no incentive for Medicaid to help promote the availability of Lifeline or support the Commission's third party eligibility verifier process.
10. We are also concerned that many if not all of the MVNOs that offer Lifeline service may be driven from the Lifeline market entirely. MVNOs that have to purchase voice and data from the national network operators are at a disadvantage with respect to minimum service standards. And, with the exception of Sprint, to date the national network operators have not expressed interest in offering mobile wireless Lifeline services.
11. Since the MVNOs marginal costs for unlimited voice may drive them out of the market, and since most of the national network operators are only peripherally involved in wireless Lifeline, we fear that the wireless Lifeline market may become significantly less competitive.

To ensure that wireless Lifeline continues to serve as a critical tool for improving health in the Medicaid population we concluded by encouraging the FCC to reconsider imposing minimum standards that are likely to reduce the wireless options available to low-income consumers, many of whom will only participate if they have access to a no-cost wireless option. Instead, the Commission should allow the market to work by allowing consumers to choose the options that work best for them, including a marketplace that would offer consumers data-enabled handsets with a bundle of voice, text and data with no co-pay.

Respectfully submitted,

The image shows two handwritten signatures in blue ink. The signature on the left is 'Paul Meyer' and the signature on the right is 'Justin Sims'.

Paul Meyer  
Justin Sims  
Voxiva Inc.