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Via ECFS

March 22, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Lifeline and Link Up*, WC Docket No. 03-109; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 12-23

Dear Ms. Dortch:

On March 21, 2016, Melissa Newman and Jeb Benedict of CenturyLink met, in separate meetings, first with Stephanie Weiner, Legal Counsel, and Gigi Sohn, Counsel, both of Chairman Wheeler's office, and Eric Feigenbaum of the Office of Media Relations, and then with Rebekah Goodheart, Legal Advisor to Commissioner Mignon Clyburn. The meetings discussed the FCC's proposal to reform the Lifeline program to support broadband service.

CenturyLink explained that the current Lifeline program warrants reform. It is overly complex for consumers and providers. For consumers, this complexity has caused confusion and a high level of frustration over the bureaucratic nature of the program. For providers, it has made administration unreasonably and needlessly burdensome, requiring processes and imposing regulatory costs and risks that have made participation undesirable.

If the program is to be modernized to support broadband, its administration should be meaningfully streamlined for all providers – not merely new broadband participants – especially by promptly shifting eligibility verification to a third party and by not requiring offering of all Lifeline broadband options in all areas. The company also cautioned against making participation mandatory for any providers or applying a rigid 10/1 Mbps minimum service level for wireline Lifeline broadband service, as it would limit options for consumers who may prefer less expensive options or who live in rural areas where only lower download and/or upload speeds are currently available.

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Pursuant to section 1.1206(b)(2) of the Commission's rules, this notice letter is being submitted to these dockets.

Sincerely,

/s/ Melissa E. Newman

Copy via email to:
Eric Feigenbaum
Rebekah Goodheart
Gigi Sohn
Stephanie Weiner