

March 23, 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 a meeting that took place on March 22, 2016 between Paul Meyer, Voxiva Chairman and Co-CEO, Pamela Johnson, Voxiva Co-Founder and Chief Health Officer, and Patrick Halley of Wilkinson Barker Knauer, LLP, Voxiva’s regulatory counsel, with Commissioner Mignon Clyburn and Rebekah Goodheart, Wireline legal advisor to Commissioner Clyburn. During the meeting 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. 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. 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. There is now a rich body of evidence showing the impact of this model. For example a Medicaid health plan serving Indiana supported the distribution of 21,425 “Health Phones” (Lifeline service bundled with Voxiva health messaging services) to their Medicaid recipients. A review of health claims data demonstrated that there was a 57% increase in physical exam attendance compared to those that did not use a Health Phone and a 77% cost reduction for those visits.
4. Other health outcomes from text messaging programs delivered through mobile phones (including but not limited to Lifeline subscribers) service include:
  - A doubling of flu shot utilization by new mothers after receiving a text reminder.<sup>1</sup>
  - A tripling of annual wellness visit attendance.<sup>2</sup>

---

<sup>1</sup> Elizabeth T. Jordan et al., *Encouraging Influenza Vaccination Among Text4baby Pregnant Women and Mothers*, 49 AM. J. OF PREVENTIVE MED. 563 (2015).

- A reduction in reported alcohol consumption among pregnant women.<sup>3</sup>
  - Improvement in blood glucose levels amongst diabetics.<sup>4</sup>
  - Significantly higher levels of health knowledge.<sup>5</sup>
  - An eleven times increase on accessing telephone based health line services.<sup>6</sup>
5. For homeless Medicaid beneficiaries, a mobile phone is literally be their lifeline: they are far sicker and greater risk than the general population. A mobile phone is likely to be their sole point of contact and can facilitate their access to vital services and, of course, they have no home at which to install fixed broadband. In addition to the hundreds of thousands of homeless people who already qualify for Medicaid because they have children and/or disabilities, an additional estimated 1.2 million became eligible for Medicaid under the Affordable Care Act.<sup>7</sup>
  6. Voxiva wants to be sure that under the new rules, Medicaid can continue to leverage Lifeline wireless service.
  7. 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.
  8. If a co-pay is required, many of the most vulnerable Medicaid beneficiaries will not be able to benefit from Lifeline at all.
  9. Moreover, in many states Medicaid health plans are prohibited from promoting any services that involves a co-pay for their beneficiaries.
  10. 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.
  11. 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 to them with respect to minimum service standards. And, with the exception of Sprint, to date the national network operators have barely engaged in the provision of mobile wireless Lifeline services.

---

<sup>2</sup> See *More Than 3,500 Amerigroup Washington Members Improve Health Outcomes Through Voxiva's Connect4health Mobile Phone Messages*, BUSINESSWIRE (May 21, 2015, 10:00 AM), <http://www.businesswire.com/news/home/20150521005325/en/3500-Amerigroup-Washington-Members-ImproveHealth-Outcomes#.VddAkk1zPIV>; see also *Text Reminders Have Increased Members' Annual Physical Visits by Two Times in New York*, VOXIVA (May 21, 2015), <http://voxiva.com/index.php/about/news/121-over-36-000-healthplus-amerigroup-members-improve-health-outcomes-through-voxiva-s-connect4health-mobile-phone-messages-text-reminders-have-increased-members-annual-physical-visits-by-two-times-in-new-york>.

<sup>3</sup> William D. Evans et al., *Pilot Evaluation of the Text4baby Mobile Health Program*, 12 BMC PUB. HEALTH 1031 (2012).

<sup>4</sup> Shannon Grabosch et al., *151: Text4baby Improves Glycemic Control in Pregnant Women with Diabetes*, 210 AM. J. OF OBSTETRICS AND GYNECOLOGY S88 (2014).

<sup>5</sup> Evans et al., *supra* note 3.

<sup>6</sup> See *Text Reminders Have Increased Members' Annual Physical Visits by Two Times in New York*, *supra* note 2.

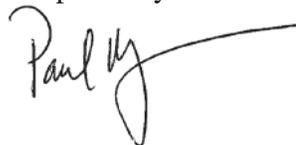
<sup>7</sup> See <http://content.healthaffairs.org/content/32/9/1552.abstract>.

12. 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 the 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.

If the Commission continues to believe that the imposition of minimum standards is necessary for mobile service because the program “hasn’t always provided robust levels of service,”<sup>8</sup> Voxiva encourages the Commission to establish a **minimum service bundle** that all wireless Lifeline service providers must meet to receive Lifeline support and to encourage robust competition above such a floor. Doing so would recognize the fact that consumers prefer a mix of voice, text and data. For example, the Commission could require that all providers of mobile Lifeline service must offer **unlimited text messages**, and a minimum of **300 units of voice or data** where **one unit equals 1 megabyte of data or 1 voice minute**. Unlimited text messages would still allow the consumer to communicate if he or she exceeds the minimum allowance and does not have the funds to pay for additional units. Text messages are also critical to enabling proven health interventions. In addition, the Commission could require that providers ensure that consumers can **access Wi-Fi networks** at hotspots. Requiring Wi-Fi access would ensure that the Lifeline program was supporting the smart phone access that consumers need and expect and moving away from voice-only service on feature phones. Further, the Commission should commit to reviewing the minimum service bundle required on an annual or biannual basis to determine if the requirements should be modified based on current market conditions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul Meyer", with a long horizontal flourish extending to the right.

Paul Meyer  
Voxiva Inc.

---

<sup>8</sup> See Jon Wilkins & Matt DelNero, *Lifeline: Striking the Right Balance*, FCC BLOG (Mar. 21, 2016, 1:45 PM), <https://www.fcc.gov/news-events/blog/2016/03/21/lifeline-striking-right-balance>.