



March 23, 2016

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20554

Re: Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch:

Sprint Corporation (“Sprint”) remains concerned that the proposed sudden and dramatic shift in the Commission’s Lifeline policy threatens to undermine the ability of 14 million Lifeline consumers to remain connected. The proposed phase-in plan outlined in the Fact Sheet released on March 8 will be impossible for carriers to implement within the timeframes proposed or in a manner that would not result in a widespread disruption of service for our Nation’s most vulnerable households.

Sprint understands and supports the Commission’s goal of transforming the Lifeline program to support broadband services. To accomplish this goal, however, the Commission must adopt a timeline for transformation that is realistic in its expectations for the evolution and availability of technology, cost of service, associated provider costs, and consumer demand, as well as pragmatic in its implementation, recognizing the need for carriers to develop new systems and sales channels for a vastly revised program. Whatever glide path the Commission establishes should be subject to review and potential revision at least annually based on evolving market conditions.

In order to assist the Commission in reaching its goal of creating a broadband plan, while allowing a realistic transition, Sprint submits this more detailed proposal as an alternative to the phase-in plan detailed in the Fact Sheet:

The subsidy for new subscribers of voice-only Lifeline services gradually will be eliminated for both wireless and wireline service providers over a three year transition period.¹ During this transition period, existing voice-only subscribers would continue to be eligible for the current \$9.25 subsidy, but carriers will be required to convert these

¹ The Commission has no rational basis for eliminating support for wireless voice service while continuing to provide full subsidies for wireline services which provide less functionality (all distance calling, mobility).

existing subscribers to either a bundled voice and data plan, or stand-alone data plan, by December 1, 2018.²

On December 1, 2016, carriers may begin offering either (1) a stand-alone broadband service offering as described in the Fact Sheet, or (2) a bundled voice and data service package that meets the following standards: 350 voice minutes and 500 Mb of data as of December 1, 2016; 350 voice minutes and 750 Mb of data on December 1, 2017; and 350 minutes and 1 Gb of data on December 1, 2018. Carriers who offer either a stand-alone broadband service or a bundled voice and data offering would be eligible for the \$9.25 subsidy.

On December 1, 2016, carriers offering a bundled plan would begin to include smartphones that are WiFi enabled as a part of their Lifeline handset portfolio.³ Consumers will continue to have a choice of devices and existing customers would not be prohibited from continuing to take service using their current device.

This proposed offering builds upon the proposals set forth in Sprint's March 16 *ex parte* letter, effectively combining Sprint's existing Assurance Wireless voice service offering of 350 minutes per month and Sprint's broadband-only proposal. The current proposal ensures that existing Lifeline customers who rely on mobile voice service will continue to receive mobile voice minutes throughout the transition period while making available to Lifeline customers increasing data allotments as these customers are encouraged to adopt broadband service.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433-4503.

Sincerely,

/s/ Norina T. Moy

Norina T. Moy
Director, Government Affairs

² If the Commission determines a minimum level of service is required for mobile voice, that minimum should be set at 500 minutes. An immediate conversion to unlimited voice calling would not be economically sustainable.

³ These would not necessarily be "free" devices but will likely require some consumer payment.