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March 25, 2016

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

**Re: Notice of Lifeline Connects Coalition Oral Ex Parte Presentation;
WC Docket Nos. 11-42, 09-197, 10-90**

Dear Ms. Dortch:

On March 23, 2016, the undersigned of Kelley Drye & Warren LLP, on behalf of the Lifeline Connects Coalition (Coalition),¹ had a phone conversation with Travis Litman, Legal Advisor to Commissioner Jessica Rosenworcel, to discuss the Lifeline program and the Second Further Notice of Proposed Rulemaking (FNPRM).²

During the conversation, I expressed the Coalition's view that the Lifeline program should support affordable mobile services, including broadband accessed through smartphones that can serve as effective tools for addressing, at least in part, homework gap challenges faced by low-income households. In particular, I expressed the view that adoption of broadband services most likely would be spurred through the bundling of voice and broadband service offerings and articulated the need to ensure that any "minimum service standards" for bundles should strike a balance between voice-only and broadband-only minimums and should not be based exclusively on meeting one or the other standard (or a more stringent standard). Further, I suggested that the

¹ The members of the Lifeline Connects Coalition are i-wireless, LLC, Telrite Corporation, Blue Jay Wireless, LLC, and American Broadband & Telecommunications Company.

² See *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 11-42, 09-197, 10-90, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. June 22, 2015) (Second FNPRM).

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Coalition's proposal for minimum standards for bundles strikes the right balance with modest but meaningful growth in broadband access over time.

I also noted the importance of providing ETCs with more regulatory certainty, which is necessary to support the expansion of smartphone-based Lifeline service offerings, and emphasized that extending the current National Lifeline Accountability Database (NLAD)-based automatic benefit transfer eligibility window from two to twelve months is likely the most effective action the Commission can take at this time to incentivize ETCs to make investments in smartphone-based Lifeline service offerings, including devices with Wi-Fi and hotspot capability. With respect to such smartphone based offerings, I expressed the Coalition's desire and willingness to increase the availability of Wi-Fi and hotspot-capable smartphones for Lifeline subscribers. With device purchasing practices and costs varying widely among ETCs, I explained that any device requirements should grandfather both devices in service and devices purchased or subject to purchase commitments.³ I further explained that any such requirements should be phased-in over time, as Wi-Fi and hotspot capability are often separate specifications with added costs.⁴

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



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cc: Travis Litman

³ Some ETCs purchase devices in bulk quantities a few times a year, while others purchase every couple of months.

⁴ The additional cost of adding hot-spot capability can vary significantly depending on the Lifeline provider and the source of devices. Our limited survey showed costs ranging from less than \$1 to as high as \$12.