



March 25, 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:

On March 23, 2016, Charles McKee and I of Sprint Corporation (“Sprint”) met with Nick Degani of Commissioner Pai’s office to discuss reforms to the federal Lifeline program. Sprint expressed its deep concern that certain elements of the draft Order (as summarized in the Fact Sheet released on March 8¹) are contrary to established Commission policy, and would undermine the provision of the voice services that are the core of the current program upon which 14 million end users currently rely. Sprint explained why the proposal described in the Fact Sheet is not competitively neutral in the treatment of wireless and wireline Lifeline service providers; why the unlimited voice proposal is not economically feasible for wireless service providers such as Sprint; and described the administrative and customer service factors which make it impossible for Assurance Wireless to implement a system of end user co-payments or to convert its existing customer base to broadband-enabled handsets by December 1, 2016. Finally, Sprint noted that existing Lifeline rules such as the non-usage requirement would have to be amended to reflect a broadband-centric Lifeline program.

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

c: Nick Degani

¹ See <https://www.fcc.gov/document/fact-sheet-lifeline-modernization-proposal>.