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MAY 08 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 8, 2000

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: San Carlos Apache Telecommunications Utility, Inc.
Ex Parte Presentation
CC Docket No. 96-45
WT Docket No. 99-266

Dear Ms. Salas:

On May 8, 2000, an original and two copies of the attached material were submitted to the Commission in response to FCC staff inquiry regarding Lifeline/Link-up eligibility criteria.

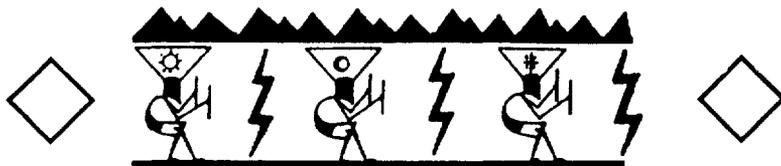
Should there be any questions, please contact me at the number listed above.

Very truly yours,


Sylvia Lesse

Attachments

cc: Eric Jensen, Deputy Director, OCBO
Helen Hillegass, Attorney-Adviser, OCBO
Mr. Genaro Fullano, OCBO



P.O. Box 158
San Carlos, Arizona 85550
Phone (520) 475-2433
FAX (520) 475-9946

Vernon James
President

San Carlos Apache Telecommunications Utility, Inc.

Brent A. Kennedy
General Manager

May 4, 2000

Ms. Helen Hillegass
Office of Communication Business Opportunities
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Ms. Hillegass:

In response to your request for a more detailed response to Staff questions regarding Lifeline/Link-up eligibility criteria which arose during general conversations among Messrs Eric Jensen, Genaro Fullano and Ms. Helen G. Hillegass and representatives of San Carlos Apache Telecommunications Utility, Inc. ("San Carlos"), Messrs, Vernon James (Board President) and Brent A. Kennedy (General Manager), along with their attorney, Sylvia Lesse, San Carlos provides the following:

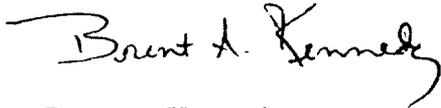
Eligibility criteria for federal programs which are based on an individual's financial circumstances raise generic privacy concerns among participants. Nonetheless, a large number of potential Lifeline/Link-up program participants have demonstrated their willingness to provide requested information to evidence qualification for other needs-based benefit programs run by the federal government and the Tribe. Unfortunately, the attractiveness of participation in such programs appears to diminish with the frequency that such personal financial information is solicited. In addition, the frustration of potential participants increases when each program has different criteria. Consequently, participation in such programs may be artificially low.

These problems and frustrations are highlighted in the context of Lifeline/Link-up eligibility criteria. As an operating local exchange carrier, San Carlos recognizes that its administrative burden is minimized by the relatively short list of programs against which to judge eligibility for Lifeline/Link-up programs. San Carlos also submits, however, that this relatively short list presents a hurdle to many Native Americans who, while eligible for the currently-specified programs, instead participate in other federal programs, including programs more narrowly targeted to tribal communities. Accordingly, many Native Americans do not currently receive the federal telecommunications assistance for which they qualify.

San Carlos advocates expansion of the list of programs which would qualify subscribers for Lifeline/Link-up participation, and suggests that Native American needs-based programs should be included among that list. Certainly, the addition of Head Start, Low Income Home Energy Assistance Program ("LIHEAD"), Aid to Families with Dependent Children ("AFDC"), and Two Parents Employment Program ("T-PEP") should be included, but the more focused tribal programs, such as the Tribal Work Experience Program ("TWEP") and General Assistance ("GA") should also be included. Given the focus on extending service to as many households and individuals as possible, providing such assistance to those who have already demonstrated a need for assistance in other areas, without redundant and burdensome qualifying procedures, is appropriate and in the public interest.

We would be pleased to discuss this matter further at your convenience.

Respectfully submitted,

A handwritten signature in black ink that reads "Brent A. Kennedy". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Brent A. Kennedy
General Manager

BAK/nc