

Alan Buzacott
Executive Director
Federal Regulatory Affairs



1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2595
Fax 202 336-7922
alan.buzacott@verizon.com

December 14, 2010

Ex Parte

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

**Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45;
Lifeline and Link Up, WC Docket No. 03-109**

Dear Ms. Dortch:

On December 13, 2010, Chris Miller and the undersigned of Verizon met with Trent Harkrader, Kim Scardino, and Cindy Spiers of the Wireline Competition Bureau to discuss the Federal-State Joint Board on Universal Service's recent Recommended Decision in the above-captioned dockets. We explained that the Commission should, consistent with the Recommended Decision, seek further comment on a centralized administrator and database to manage functions associated with the enrollment, certification, and verification of Lifeline customers. We pointed out that two of the largest states – California and Texas – already have state-contracted Lifeline administrators, and thus have demonstrated the feasibility of using a centralized administrator to manage Lifeline enrollment.

We also discussed the Joint Board's recommendation that the Commission adopt mandatory outreach requirements for ETCs. The telephone penetration rate has now reached an all-time high of 96 percent, and there is no evidence that imposing a mandatory outreach requirement on ETCs would further increase subscribership. State social service agencies and community-based organizations – not ETCs – are best positioned to reach any low-income individuals who may want telephone service but do not have it today. Rather than impose mandatory outreach requirements on ETCs, the Commission should assign state social service agencies a more active role in consumer outreach and in qualifying eligible end-users, as recommended by the National Broadband Plan.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Alan Buzacott".

cc: Trent Harkrader
Kim Scardino
Cindy Spiers