

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of)	
)	
Lifeline and Link Up Reform and)	WC Docket No. 11-42
Modernization)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link Up)	WC Docket No. 03-109
_____)	

REPLY COMMENTS OF AMVENSYS TELECOM HOLDINGS, LLC

Introduction

Amvensys Telecom Holdings, LLC (“Amvensys”), through its undersigned counsel, hereby submits its reply comments in the above-referenced proceeding.¹ Amvensys provides low-cost telephone services through its subsidiaries, dPi Mobile, LLC (“dPi Mobile”) and dPi Teleconnect, LLC (“dPi Teleconnect”) and, as explained in its comments, supports the Commission’s proposals for reform of the Lifeline and Link Up programs, but cautions the FCC that it must ensure that reforms do not harm low income customers or unduly burden carriers. In response to the comments filed in the proceeding, Amvensys hereby provides its support for the April 15, 2011 proposal for interim procedures filed by a coalition of eligible telecommunications carriers (“ETC”), and urges the Commission to adopt a “one-per-person” rule.

¹ *In the Matter of Lifeline and Link Up Reform and Modernization, Federal-State Joint Board on Universal Service, Lifeline and Link Up*, WC Docket No. 11-42 and 03-109 and CC Docket No. 96-45, FCC 11-32 (rel. March 4, 2011) (“Lifeline and Link Up NPRM”).

I. Amvensys Supports ETC Coalition Proposal

Amvensys supports the April 15, 2011 proposal filed by a coalition of ETCs in this proceeding.² At the request of the FCC, the ETC Coalition developed several recommendations to immediately reduce waste, fraud and abuse of the funds while the FCC develops long term rules. Specifically, the interim rule proposal focuses on potentially reducing the instances of duplicate support provided to Lifeline recipients through the use of a Lifeline Duplicate Resolution Process.

Amvensys strongly agrees with the ETC Coalition and the FCC that waste, fraud and abuse, including duplicate support, in the Lifeline and Link Up programs must be reduced. As demonstrated by the work of the ETC Coalition, Amvensys believes that an industry-based approach, adopted as voluntary guidelines by the Commission, is the best way to address concerns about duplicate support prior to the adoption of final rules. In addition, the FCC should remain open to alternative proposals from other industry groups and Lifeline providers. For instance, carriers could work together to identify and eliminate double collection by some customers. This objective could be achieved through an industry-created central database, a sharing of information among providers, or a combination thereof.

Amvensys also urges the Commission to proceed cautiously with the adoption of any interim procedures. Any orders by the Commission on these issues prior to a final order based upon the full record should be measured and should be adopted only as voluntary guidelines. Any mandatory and enforceable rules imposed on the ETCs prior to a complete vetting of the record would be premature and potentially harmful.

² See Ex Parte Letter to Marlene Dortch, Secretary, Federal Communications Commission from United States Telecom Assoc., CTIA, AT&T, CenturyLink, Cox Communications, Inc., General Communications, Inc., Nexus Communications, Inc., Sprint Nextel Corp., Tracfone Wireless, Inc., and Verizon Communications, Inc. filed in Lifeline and Link Up Reform and Modernization, WC Docket 11-42 (filed April 15, 2011) (“ETC Coalition”).

II. The Commission Must Adopt the One-Per-Person Rule

Amvensys reiterates its support of the Joint Board's recommendation that Lifeline-funded wireless services should be available to every qualified adult instead of being limited to only one person per residential address. This "one-per-person" rule most accurately reflects the current use of wireless services and would be the most equitable use of these funds. As the Commission knows, there has been a significant migration from traditional landline service to mobile voice services, and the Commission should modify the support rules to reflect the real way in which these services are used in order to provide the most practical support to low income individuals. In addition, for economic reasons, rules allowing each eligible adult to obtain supported wireless service, instead of only one person per address, would avoid unduly penalizing low income individuals who share a residence due to economic difficulties. Furthermore, access to a wireless service is essential and often provides the only reliable method for recipients to remain in contact with important social and economic services such as unemployment agencies. Low income individuals frequently change residences at a higher rate than other members of the community and mobile telephone service will help them keep in contact with these important assistance organizations.

Conclusion

For the foregoing reasons, Amvensys supports the ETC Coalition proposal, but urges the Commission to proceed cautiously and to adopt interim procedures only on a voluntary basis. Amvensys also supports the adoption of the "one-per-person" rules for supported wireless or

wireline services as the best method for ensuring equitable and reasonable support to low income recipients.

Respectfully submitted,

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