

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

To: The Federal Communications Commission

**REPLY COMMENTS OF
CTIA–THE WIRELESS ASSOCIATION®**

Michael F. Altschul
Senior Vice President & General Counsel

Christopher Guttman-McCabe
Vice President, Regulatory Affairs

Scott K. Bergmann
Assistant Vice President, Regulatory Affairs

CTIA–The Wireless Association®
1400 16th Street, NW, Suite 600
Washington, DC 20036
(202) 785-0081

May 10, 2011

TABLE OF CONTENTS

I. INTRODUCTION & SUMMARY.....	1
II. THE RECORD DEMONSTRATES BROAD SUPPORT FOR A CENTRALIZED NATIONAL ELIGIBILITY DATABASE.....	2
III. COMMENTERS RAISE SIGNIFICANT QUESTIONS ABOUT THE PROPOSED “ONE-PER-RESIDENCE” RULE	6
A. Commenters Correctly Identify Significant Administrative Problems with the Proposed One-Per-Residential-Address Rule	6
B. The One-Per-Residential Address Rule Is Inconsistent With Technological and Marketplace Trends	8
C. Any New Eligibility Rules May Only Apply Prospectively.....	11
IV. ESTABLISHING MINIMUM CHARGES WOULD HARM LOW-INCOME CONSUMERS, AS THE RECORD DEMONSTRATES	12
V. THE RECORD DEMONSTRATES THAT MANDATORY PRO-RATA REPORTING WOULD BE BURDENSOME AND INEFFECTIVE.....	13
VI. CONCLUSION.....	15

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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

To: The Commission

**REPLY COMMENTS OF
CTIA–THE WIRELESS ASSOCIATION®**

I. INTRODUCTION & SUMMARY

CTIA–The Wireless Association® (“CTIA”) submits these reply comments on the Commission’s Notice of Proposed Rulemaking for reforming Lifeline and Link Up (together, “Lifeline/Link Up” or “the programs”) universal service low-income programs and applauds the Commission’s initiative to reform the Lifeline/Link Up programs.¹ As discussed in more detail below, the initial comments show strong support for a centralized national eligibility database to prevent duplicate claims for support, but reveal significant questions about the proposed “one-per-residential-address” rule. The record also shows that imposing minimum charges for Lifeline service would harm low-income consumers, and that requiring pro-rata reporting of partial-month Lifeline subscribers is burdensome for carriers and unnecessary to achieve the Commission’s goals.

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

II. THE RECORD DEMONSTRATES BROAD SUPPORT FOR A CENTRALIZED NATIONAL ELIGIBILITY DATABASE

In its opening comments, CTIA argued that creation of a national database would be the best way to verify customer eligibility, track verification, and check for duplicate support – and that, indeed, there could be no effective resolution of the latter problem without a database.² As CTIA emphasized, the current system is plagued by numerous problems: it requires each Eligible Telecommunications Carrier (“ETC”) to act as an independent verification agency, assuming responsibilities well beyond core carrier functions; requires private entities to handle users’ sensitive financial information; and precludes effective review of whether a particular consumer is receiving support for another service.³ Creation of a database would be “among the most effective ways to improve administration of the Lifeline/Link Up programs because it would assign program functions to parties who are best able to perform them, allow carriers to focus on their areas of competency, and better protect consumer privacy.”⁴ As detailed below, the record reveals nearly unanimous support for the creation of a Lifeline database. Service providers, regulators, and public advocates all emphasize the benefits that would flow from such a database, and agree that the database should be (1) national in scope and (2) administered by a neutral third party, rather than by an ETC.

First, a centralized national eligibility database is the only definitive way to address duplicate claims. Absent a database, providers have no way of knowing if another ETC is providing Lifeline service to a given subscriber. Providers of all types highlight this important outcome: Cox urges the Commission “to pursue a national database as the correct solution to

² CTIA Comments at 4-7.

³ *See id.* at 5-6.

⁴ *Id.* at 5.

duplicate claims.”⁵ Cricket “agrees that the use of a database would facilitate the efforts of ETCs, USAC, and the Commission to guard against duplicative funding.”⁶ Nexus Communications states that a database would quickly apprise an ETC as to whether a subscriber is eligible for funding and whether the customer already received low-income support.⁷ And COMPTTEL emphasizes that “duplicate claims could be substantially reduced, if not eliminated, if ETCs had the ability to verify up front whether a customer was already receiving subsidized service.”⁸

State regulators also express support for a database’s potential to mitigate duplicative funding. The Florida PSC states that creation of a database is “[t]he only way to prevent one person from receiving two wireless Lifeline credits from two different providers,”⁹ while the PUCO staff argues that a database would “provide[] a good start to ensure a single line per residence to help prevent waste, fraud and abuse of the low-income fund.”¹⁰

Second, commenters agree that a centralized national eligibility database would reduce burdens on consumers, ETCs, states, and USAC. Sprint explains that “a national Lifeline

⁵ Cox Comments at 3.

⁶ Leap Comments at 7.

⁷ Nexus Comments at 22-23.

⁸ COMPTTEL Comments at 21-22. *See also id.* at 21 (“COMPTTEL wholeheartedly supports the development and implementation of a national database to verify consumer eligibility for Lifeline/Link Up assistance, track verification and check for duplicate claims.”); GCI Comments at 51.

⁹ Florida PSC Comments at 10.

¹⁰ PUCO Staff Comments at 4. *See also* IURC Comments at 11-12. Even those regulators expressing skepticism regarding costs or other issues relating to the creation of a database deem the concept “good” and even “noble.” *See* Missouri PUC Comments at 17-18; Michigan PSC Comments at 9.

database has the potential to streamline operation of the Lifeline program and to reduce waste, fraud and abuse.”¹¹ Cox agrees that a database “could substantially reduce burdens on consumers, ETCs, States, and the Universal Service Administrative Company; eliminate the need to certify eligibility on a state-by-state basis; and help identify program violations.”¹² Numerous other providers agree.¹³ This position is shared by the Minority Media and Telecommunications Council, which emphasizes that “[t]he efficiencies and cost savings gained through consistent coordinated enrollment and self-certification, in combination with a database of eligible participants will help offset concerns over waste, fraud, and abuse and allow the Commission to focus on ensuring that eligible consumers are aware of the program and can get connected to life changing technology.”¹⁴

Third, a broad collection of commenters agree that the database should not be administered by ETCs themselves, but rather by a neutral third party; for example, by USAC or the states or their designees. Nexus Communications states simply that “the database administrator must be a neutral third party with no ownership or financial affiliation with any ETC.”¹⁵ The Florida PSC argues that “[w]hether USAC or a third-party administrator is used,

¹¹ Sprint Comments at 3.

¹² Cox Comments at 3.

¹³ *See, e.g.*, CenturyLink Comments at 21 (database should “help to streamline enrollment by simplifying eligibility verification, [and] help to reduce, if not eliminate, the need for annual verification processes”); Nexus Comments at 23 (a centralized database “would increase efficiency and would reduce waste, fraud and abuse by eliminating duplicate claims and lowering the administrative burdens associated with the current payer-based system”); GCI Comments at 51 (“The creation of a national Lifeline database or a national interconnected system of state databases would result in sweeping efficiency gains for the FC and for ETCs....”).

¹⁴ Minority Media and Telecommunications Council Comments at 6.

¹⁵ Nexus Comments at 24.

any national database ... would have to be maintained by an independent administrator under strict confidentiality provisions to protect the Lifeline subscriber's/applicant's personal identifying information.”¹⁶ And the Minority Media and Telecommunications Council states that, “to guard against actual or potential misuse and prevent eligible telecommunications participants from being denied service, the Commission should assign the creation of a database to an independent third party and periodically require audits of the database.”¹⁷ Other commenters agree.¹⁸

For example, AT&T proposes a framework under which states “(through [their] designated state entity or other state-approved entities, such as social services agencies) should be responsible for determining whether a particular consumer is eligible for Lifeline support (based on either participation in a certain public assistance program or household income).”¹⁹ Based on a state entity's determination of eligibility, the national database would be updated to reflect a qualifying consumer's status. CTIA believes that this approach would reasonably align the functions associated with determining Lifeline eligibility among the various participants in the process.

The initial comments demonstrate virtually universal support for a central eligibility database. The Commission should proceed without delay to implement this important tool to improve the low-income universal service program.

¹⁶ Florida PSC Comments at 24.

¹⁷ MMTC Comments at 7.

¹⁸ *See, e.g.*, COMPTTEL Comments at 21 (urging that USAC administer the database); PUCO Staff Comments at 20 (same).

¹⁹ AT&T Comments at 11.

III. COMMENTERS RAISE SIGNIFICANT QUESTIONS ABOUT THE PROPOSED “ONE-PER-RESIDENCE” RULE

A. Commenters Correctly Identify Significant Administrative Problems with the Proposed One-Per-Residential-Address Rule

The Commission proposed the one-per-residential-address rule to “provide[] a bright line that is easy for USAC and ETCs to administer.”²⁰ However, the record reflects that this “bright line” rule will require numerous complex exceptions, and ETCs will face significant difficulty in administering the proposed rule because of its complexity and its reliance on information ETCs are not best suited to collect or evaluate.

First, even a perfectly clear-cut clear rule that absolutely limits each U.S. Postal Address to a single Lifeline-supported service will not reduce duplicate claims absent a centralized database that allows carriers to determine if a given address is already receiving service.²¹ Additionally, as the Benton Foundation points out, accurately administering even this strict version of the proposed rule would be “very burdensome” because the U.S. population is quite mobile, changing addresses relatively frequently, and therefore a shared address in a social program does not conclusively demonstrate that two individuals actually are living together.²² Low income users typically are even more transitory than the general population.

Moreover, as the NPRM itself acknowledges and commenters emphasize, a one-per-residential-address rule would not provide a bright line for ETCs or USAC. In order to avoid undermining the purposes of the low-income program, a wide range of exceptions or conditions

²⁰ NPRM ¶ 106.

²¹ *See supra* Section II.

²² Benton Foundation *et al.* Comments at 4.

would be necessary,²³ imposing an impossible level of administrative complexity. As Consumer Cellular aptly comments, “[t]he ‘bright line’ rule will require plenty of exceptions, because as consumers become eligible for Lifeline service, many will try to share the costs of their largest expenses, such as shelter.”²⁴ The NPRM itself observes that a one-per-residential-address rule will not work for residents of Tribal lands, group living facilities, and residents of commercially zoned buildings.²⁵ As commenters point out, the most desperately poor individuals - who most need support to remain connected - typically share a residence or have no residence at all.²⁶

Even if an administrable rule could be devised to address all of the necessary exceptions, ETCs are ill-equipped to gather and verify the unique household information that would be necessary to evaluate the eligibility of any given living situation. ETCs do not routinely track their subscribers’ living arrangements or the other members of a subscriber’s household.²⁷ Similarly, ETCs are in no position to accurately determine whether people living together are related. And, even if they are related, should two independent but related adults be limited in their access to support? The Commission has already noted such determinations may not be

²³ See, e.g., Massachusetts Dept. of Telecomm. and Cable Comments at 5-7 (“MDTC strongly urges the FCC to adopt much need exceptions to the one-per-residence rule.”) Verizon and Verizon Wireless Comments at 9 (“[N]umerous exceptions to the one-per-residence rule are necessary to avoid the unintended consequence of excluding eligible Lifeline subscribers.”); Leap Wireless International, Inc. Comments at 8-9; CenturyLink Comments at ii, 13-14 (“There should be some appropriate exceptions to the one-line-per-residence rule...”)

²⁴ Consumer Cellular, Inc. Comments at 17.

²⁵ NPRM ¶ 108.

²⁶ Consumer Cellular, Inc. Comments at 17 (“The poorest, the most elderly, and the least healthy Americans that would otherwise qualify for Lifeline will often not have a choice as to whether to share the cost of shelter.”); National Consumer Law Center Comments at 1-2; New York State Public Service Commission Comments at 8.

²⁷ See, e.g., AT&T Comments at 9; TracFone Wireless, Inc. Comments at 15; Verizon and Verizon Wireless Comments at 9.

administratively feasible.²⁸ Even if such facts could be collected and validated, requiring ETCs to do so would raise privacy concerns,²⁹ and any self-certifications would remain unverifiable.³⁰

Therefore, as the record demonstrates, a one-per-residential-address rule would be anything but an easy-to-administer bright line rule. Such a rule would remain vulnerable to fraud while imposing a large number of expensive or infeasible requirements on ETCs.

B. The One-Per-Residential Address Rule Is Inconsistent With Technological and Marketplace Trends

As the NPRM acknowledges, the Lifeline and Link Up programs were originally adopted in the era of landline telephone services, and technology and the marketplace have shifted radically in the years since.³¹ Many commenters note that low-income consumers, like all consumers today, rely heavily on mobile services, particularly voice services.³² “[L]ow-income individuals, including members of communities of color, disproportionately rely on mobile connections to fulfill their communications needs.”³³ Indeed, low-income households are more likely than other groups to “cut the cord” and rely entirely on mobile wireless communications.³⁴

²⁸ NPRM ¶ 111 (“[residence-based limitations] may be more administratively feasible than other options for defining who is eligible for support, such as family-based definitions that require an accurate determination of whether people living together are independent or related.”)

²⁹ AT&T Comments at 18; Indiana Utility Regulatory Commission Comments at 3; New Jersey Division of Rate Counsel Comments at 13; NASUCA Comments at 25; Rainbow Push Coalition Comments at 1.

³⁰ AT&T Comments at 18 n.33. *See also* New Jersey Division of Rate Counsel Comments at 13; NASUCA Comments at 25; Rainbow Push Coalition Comments at 1.

³¹ NPRM ¶ 17.

³² *See, e.g.*, COMPTTEL Comments at 14; Media Action Grassroots Network Comments at 3, 16-17; New York State Public Service Commission Comments at 4.

³³ Media Access Grassroots Network Comments at 9.

³⁴ New Jersey Division of Rate Counsel Comments at 17.

Precisely because of mobility, mobile communications services tend to be associated with a *person* rather than a *location*.³⁵ An individual can bring a mobile phone with them in the car, to work, to job interviews, to medical appointments, and more. Conversely, a mobile phone could be left in a residence, but doing so eliminates the fundamental benefit of its mobility.³⁶

To better fit today's communications marketplace, several commenters propose that Lifeline eligibility be determined on an individual basis, without reference to residence or living situation.³⁷ Establishing an eligibility rule associated with the person rather than the location of their residence would ensure that the Commission's Lifeline rules do not undermine low-income consumers' reasonably comparable access to the benefits of mobility.³⁸ This "one-per-qualifying-individual" approach, as proposed by AT&T, would better fit the technological and marketplace trend toward mobile services. Additionally, determining an applicant's eligibility

³⁵ NPRM ¶ 105; New Jersey Division of Rate Council Comments at 17 ("The Commission appropriately recognizes the differences in the two types of service, noting that wireless 'is used on an individual basis' and wireline is shared by the household..."); Cincinnati Bell Inc. Comments at 3 ("[T]he very nature of wireless service uncouples it from the residence.").

³⁶ As the New York State Public Service Commission notes, "[t]he limitation of one phone per household may not recognize the changes in the marketplace and subscriber demands. Access to emergency services may require multiple wireless phones for family members, so that when one individual leaves the home, the other members of the household have access to their own wireless phones to contact emergency services or to maintain their own important family communications during an emergency." New York State Public Service Commission Comments at 5.

³⁷ New York State Public Service Commission Comments at 4 ("NYPSC recommends that the FCC adapt the Program's discounts to the needs of the low income population receiving the service, including consideration of the provision of a mobile phone to eligible adults."); Media Action Grassroots Network Comments at 17 ("The Commission should ... limit assistance to one supported service per eligible adult."); AT&T Comments at 19 ("The Commission should adopt a 'one-per-qualifying-individual' rule."); COMPTTEL Comments at 15 ("[A] single line per qualifying eligible adult rule would better promote ... affordable access to telecommunications services."); Consumer Cellular, Inc. Comments at 17-18.

³⁸ See 47 U.S.C. § 254(b)(3).

under such an approach would be far simpler than under the one-per-residential-address or one-per-household approaches. Rather than evaluating the particulars of an applicant’s living situation, the party determining eligibility would need only consider the applicant’s financial status.

Because Lifeline eligibility is often program-based, a one-per-qualifying-individual rule would be easier for consumers to understand and might have little impact on the size of the low-income fund.³⁹ Federal and state benefit programs such as SNAP, LIHEAP, and Medicare provide benefits on a “household” or “family” basis as defined under the specific program rules. For states that base Lifeline eligibility on participation in these or other similar programs, only one individual per household is likely to qualify for Lifeline in any event.⁴⁰

However, if the Commission chooses to reject individual eligibility for Lifeline and Link Up, CTIA urges the Commission to consider adopting a “one-per-household” approach instead of the proposed one-per-residential-address approach. As noted immediately above, the benefit programs that form the basis for Lifeline and Link Up eligibility are generally provided on a one-per-household basis. Adopting a parallel eligibility structure would simplify eligibility determinations.

Under a one-per-household regime, a centralized eligibility database and independent eligibility evaluator would remain crucial. As discussed above, ETCs are not well suited to evaluate relationships or living arrangements. An independent third party would be far more appropriate to collect and evaluate such information. Indeed, as some commenters note, several

³⁹ See AT&T Comments at 19.

⁴⁰ See AT&T Comments at 19.

states already rely on independent evaluators and centralized databases to determine applicant eligibility.⁴¹

If the Commission for some reason decides to impose one-per-residential address or one-per-household requirements without creating a national database and an independent evaluator, the Commission must be extremely explicit in defining all relevant rules, exceptions, and definitions. For example, the Commission should explicitly detail all the various living arrangements that constitute a “residence” or a “household.”

C. Any New Eligibility Rules May Only Apply Prospectively

As CTIA noted in its comments, to the extent the Commission modifies its eligibility rules, all changes will be prospective only, with no retroactive effect.⁴² The proposed changes are clearly new legislative rules, as even one supporter of the one per-residential-address rule concedes,⁴³ and as such must be adopted through a full notice-and-comment rulemaking. Furthermore, applying such rules to past practices would violate basic principles of law and policy.⁴⁴

⁴¹ *See generally*, Solix, Inc. Comments (Solix is the administrator of centralized Lifeline programs in Texas and California); *see also* Verizon and Verizon Wireless Comments at 7.

⁴² CTIA-The Wireless Association® Comments at 13-15.

⁴³ *See, e.g.*, United States Telecom Assoc. Comments at 19.

⁴⁴ *See* CTIA-The Wireless Association® Comments at 14-15; *Celtronix Telemetry, Inc. v. FCC*, 272 F.3d 585, 588 (D.C. Cir. 2001) (“a retroactive rule forbidden by the APA is one which ‘alters the past legal consequences of past actions’ ”)(quoting *Bowen v. Georgetown Univ. Hosp.*, 488 U.S. 204, 219 (1988) (Scalia, J., concurring)); *id.* (citing *Bergerco Canada v. U.S. Treasury Dep’t*, 129 F.3d 189, 192-93 (D.C. Cir. 1997)(treating Justice Scalia’s concurring opinion as “substantially authoritative”)).

Accordingly, the Commission and USAC should immediately suspend any pending investigations, audits, and PQAs (or portions thereof) involving duplicate issues, and any funds “reclaimed” based on duplicate issues should be returned.⁴⁵

IV. ESTABLISHING MINIMUM CHARGES WOULD HARM LOW-INCOME CONSUMERS, AS THE RECORD DEMONSTRATES

The record shows nearly universal opposition to the proposal to impose minimum charges on Lifeline customers, with many commenters raising serious concerns about the impact that minimum charges would have on low-income consumers. Dozens of state and local government officials and social service agencies – many of whom do not typically participate in FCC proceedings – took time to submit filings observing that minimum charges would impede low-income consumers’ ability to afford service, contrary to the program’s goals.⁴⁶ As the Florida Public Service Commission notes, minimum charges may create “unnecessary obstacles for low-income households to obtaining vital communication services, and may create an unreasonable barrier to enrollment for households that need support but can’t afford to pay the fee.”⁴⁷

The risk of harm to low-income consumers is particularly difficult to justify given that, as AARP points out, there is “no indication that such a fee would prevent waste and fraud in the

⁴⁵ See, e.g., Sprint Nextel Corporation Comments at 4-8; Consumer Cellular, Inc. Comments at 11 (“Consumer Cellular would advise the Commission to limit the exercise of this power to situations where an individual, or an ETC, appears to have acted with intent to defraud the Fund, or with reckless disregard for the integrity of the Fund.”).

⁴⁶ See, e.g., AARP Comments at 5; Ala. Rep. Demetrius Wilson Comments at 1; Florida PSC Comments at 13-14; Las Vegas Urban League Comments at 1-2; N.H. Coalition Against Domestic & Sexual Violence Comments at 1; Ohio Sen. Joseph Wilson Comments at 1; Texas House Democratic Caucus Comments at 2.

⁴⁷ Florida PSC Comments at 13.

fund.”⁴⁸ No commenter presented any evidence that requiring a minimum charge would have an impact on reducing waste, fraud, or abuse in the program. Further, there is no question that the proposal would impose significant burdens on providers as well as customers.⁴⁹

The NPRM contains a number of concrete proposals that will demonstrably improve the administration of the program without harming low-income consumers. The Commission should focus on those proposals, and abandon minimum charge requirements for Lifeline consumers.

V. THE RECORD DEMONSTRATES THAT MANDATORY PRO-RATA REPORTING WOULD BE BURDENSOME AND INEFFECTIVE

As commenters point out, there is currently no requirement for ETCs to report pro-rata subscriber counts for Lifeline customers that subscribe for only part of the month.⁵⁰ The record in this proceeding does not support adopting one. The initial comments leave no doubt that pro-rata reporting is costly and burdensome.⁵¹ Some carriers point out that their billing systems are not currently capable of tracking partial-month Lifeline subscribers, such that they would be required to implement costly system updates to comply with the proposed rule.⁵² Even

⁴⁸ AARP Comments at 5.

⁴⁹ *See, e.g.*, Florida PSC Comments at 5 (“charging a minimum monthly charge ... would not be cost-effective. Sending a bill to collect such a small amount would be burdensome not only on the ETC but also the Lifeline subscriber.”) Even the Nebraska PSC, which supports a minimum charge, acknowledges that the charge would have to be \$2 or \$3 per month in order to recover carriers’ billing costs. Nebraska PSC Comments at 8.

⁵⁰ *See, e.g.*, AT&T Comments at 24-27; GCI Comments at 28-29; Verizon Comments at 11.

⁵¹ *See, e.g.*, AT&T Comments at 27; Conexions Comments at 7; Cox Comments at 8; GCI Comments at 29; Verizon Comments at 11-12.

⁵² *See, e.g.*, AT&T Comments at 27.

commenters that favor partial-month reporting under certain circumstances acknowledge that its application should be limited.⁵³

Commenters also observe that there is no evidence that the current rules, which allow optional pro-rata reporting, contribute to waste, fraud, or abuse. Indeed, there is evidence that the existing system results in carriers' receiving less support than they would receive if they filed pro-rated line counts.⁵⁴ Also, subscribers being dropped mid-month are likely to be balanced by subscribers being added mid-month.

In any event, this issue is likely to be mooted if the Commission adopts CTIA's proposal to create a central eligibility database to avoid duplicate claims. In order to respond accurately in real time to queries from ETCs, the database necessarily will have to track whether qualifying customers are receiving Lifeline service. Thus, the database may contain granular data about which subscribers are obtaining service from which carriers, allowing the tracking of partial-month subscribers.⁵⁵

In sum, there is no current requirement that ETCs report pro-rata line counts for partial-month Lifeline subscribers, and the record does not support adopting one.

⁵³ *See, e.g.*, TracFone Comments at 35-36 (only carriers that pro-rate service within the month should be required to report pro-rata subscriber counts).

⁵⁴ *See, e.g.*, AT&T Comments at 27; Cox Comments at 8.

⁵⁵ *See, e.g.*, AT&T Comments at 24.

VI. CONCLUSION

CTIA urges the Commission to reform the Lifeline and Link Up programs consistent with its filings in this proceeding.

Respectfully submitted,

CTIA–THE WIRELESS ASSOCIATION®

/s/ Scott K. Bergmann
Scott K. Bergmann
Assistant Vice President, Regulatory Affairs

Michael F. Altschul
Senior Vice President & General Counsel

Christopher Guttman-McCabe
Vice President, Regulatory Affairs

CTIA–The Wireless Association®
1400 16th Street, NW, Suite 600
Washington, DC 20036
(202) 785-0081

May 10, 2011