

June 8, 2011

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

Re: *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

Dear Ms. Dortch:

On behalf of General Communication, Inc. ("GCI"), on June 6, 2011, I spoke with Kim Scardino of the Telecommunications Access Policy Division, Wireline Competition Bureau. I stated that under the CTIA/USTA et al. proposed duplicates resolution process, carriers need to have the flexibility to address the consequences of Lifeline de-enrollment, including the ability immediately to suspend a customer's service. It is important to remember that in the context of the duplicates resolution process, the customer will be retaining one Lifeline service, and thus will not be losing telephone service altogether. Carriers should not be required to accumulate bad debt.

A copy of this letter is being filed in the above-referenced dockets.

Sincerely,



John T. Nakahata
Counsel to General Communication, Inc.

cc: Kim Scardino