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June 14, 2011

Via ECFS

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

Re: Emerios Notice of Ex Parte Presentation – WC Docket No. 11-42, CC Docket No. 96-45, and WC Docket No. 03-109

Dear Ms. Dortch:

On June 13 and 14, 2011, Jesse Crowe, CEO, Joe Cox, Senior Vice President, and Ron Renjilian, Director Government Affairs, Emerios, and the undersigned from Kelley Drye & Warren LLP participated in the Commission's Workshop on Low Income Database Issues, which followed on the Commission's Notice of Proposed Rulemaking in the above-referenced dockets and addressed issues concerning the construction and operation of a database for the Lifeline and Link Up programs.¹ The workshop was led by Kimberly Scardino, Cindy Spiers, and Jonathan Lechter of the Wireline Competition Bureau. Also in attendance on June 13, 2011 were Zachary Katz, Legal Advisor for Wireline Communications, International and Internet Issues to Chairman Genachowski, Sharon Gillett, Chief, Wireline Competition Bureau, and Trent Harkrader, Division Chief, Telecommunications Access Policy Division. On June 14, 2011, Carol Matthey, Deputy Bureau Chief, Wireline Competition Division attended. In addition to the above-named individuals, many other participants attended the workshop, and they are listed in attachments to this letter. To facilitate discussion of the establishment of a national database to address concerns about duplicate benefits and eligibility, Emerios used the attached presentation entitled, "FCC Lifeline Reform Workshop,

¹ *In the Matter of Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42, CC Docket No. 96-45, and WC Docket No. 03-109, Notice of Proposed Rulemaking (rel. Mar. 4, 2011).

KELLEY DRYE & WARREN LLP

Marlene H. Dortch
June 14, 2011
Page Two

Duplicate Elimination and Eligibility Platform.” This presentation and Emerios’ comments at the Workshop are consistent with its comments and reply comments filed in above-referenced dockets.²

This letter is being filed electronically pursuant to section 1.1206 of the Commission’s rules.

Sincerely,



Thomas Cohen
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Washington, DC 20007
202-342-8518
tcohen@kelleydrye.com
Counsel for Emerios

Attachments: (1) List of Attendees at the FCC Workshop, June 13, 2011
(2) List of Attendees at the FCC Workshop, June 14, 2011
(3) Emerios Presentation: FCC Lifeline Reform Workshop, Duplicate Elimination and Eligibility Platform

cc: Zachary Katz
Sharon Gillett
Carol Matthey
Trent Harkrader
Kimberly Scardino
Cindy Spiers
Jonathan Lechter

² Comments of Emerios, WC Docket No. 11-42, CC Docket No. 96-45, and WC Docket No. 03-109, Apr. 21, 2011, and Reply Comments of Emerios, WC Docket No. 11-42, CC Docket No. 96-45, and WC Docket No. 03-109, May 10, 2011.

ATTACHMENT
PRIVATE SECTOR ATTENDEES AT FCC LIFELINE LINK UP WORKSHOP
June 13, 2011

| | |
|-------------------|-------------------------------|
| Michael Quinn | Solix |
| Eric Sequin | Solix |
| Stuart Waldron | Solix |
| Norina Moy | Sprint |
| Mitchell Brecher | Greenberg Traurig (TracFone) |
| Javier Rosado | TracFone |
| John Nakahata | Wiltshire & Grannis (GCI) |
| Donald Kratt | 3PV |
| David Brinkman | 3PV |
| Cathy Carpino | AT&T |
| Mike Tan | AT&T |
| Mary Henze | AT&T |
| Jerry James | Comptel |
| Mary Albert | Comptel |
| Barrett Sheridan | NASUCA |
| Frank Delcol | Tag Wireless |
| Chuck Schneider | dPi Teleconnect |
| Andrew Karl | Sage Telecom |
| Terri Kruse | ATMS |
| Matt Connolly | Yourtel America |
| Alan Buzacott | Verizon |
| Karen Majcher | USAC |
| Pamela Gallant | USAC |
| Ken Eisner | One Economy |
| Chuck Campbell | CGM |
| Kevin Murphy | CGM |
| Eric Robeson | West |
| Matthew Brill | Latham & Watkins (Cricket) |
| Jarrett Taubman | Latham & Watkins (Cricket) |
| Danielle Frappier | Davis Wright Tremaine (Nexus) |
| Scott Bergmann | CTIA |

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| Jerry James | Comptel |
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| Alan Buzacott | Verizon |
| Ken Eisner | One Economy |
| Chuck Campbell | CGM |
| Kevin Murphy | CGM |
| Eric Robeson | West |
| Danielle Frappier | Davis Wright Tremaine (Nexus) |

FCC Lifeline Reform Workshop

Duplication Elimination and Eligibility Platform (DEEP)

June 13, 2011



EMERIOS

Overview

- Introduction to Emerios
- The DEEP Solution
- System Requirement Overview
- Workflow Diagram and System Response
- APPENDIX
 - Detailed System Requirements
 - Glossary of Terms

Emerios Qualifications

- Founded in 1997, privately held minority owned business with over 400 employees and contractors. Emerios is not owned by any ETCs.
- The Emerios platform has enrolled over 5.0 million lifeline consumers in the past three years
- The Emerios platform has completed successful annual verifications for over 2.0 million Lifeline Consumers
- Emerios platform is easily configured for multiple tenants and is currently adding new ETC clients

Emerios' DEEP Solution:

A Phased Approach

Phase 1

1-3
months

Deploy The Duplicate Elimination System (DES)

- Single Benefit/Household
- Right Party ID Checking
- Carrier Preference Mgmt
- Real Time Response
- National Database
- Escalation Procedure

Phase 2

3 months
– 2 years

Deploy Eligibility and Verification System (EVS)

- Connect to State Eligibility Databases
- Integrate with 3rd Party eligibility services
- Integration with other eligibility databases



Lifeline Modernization and Reform:

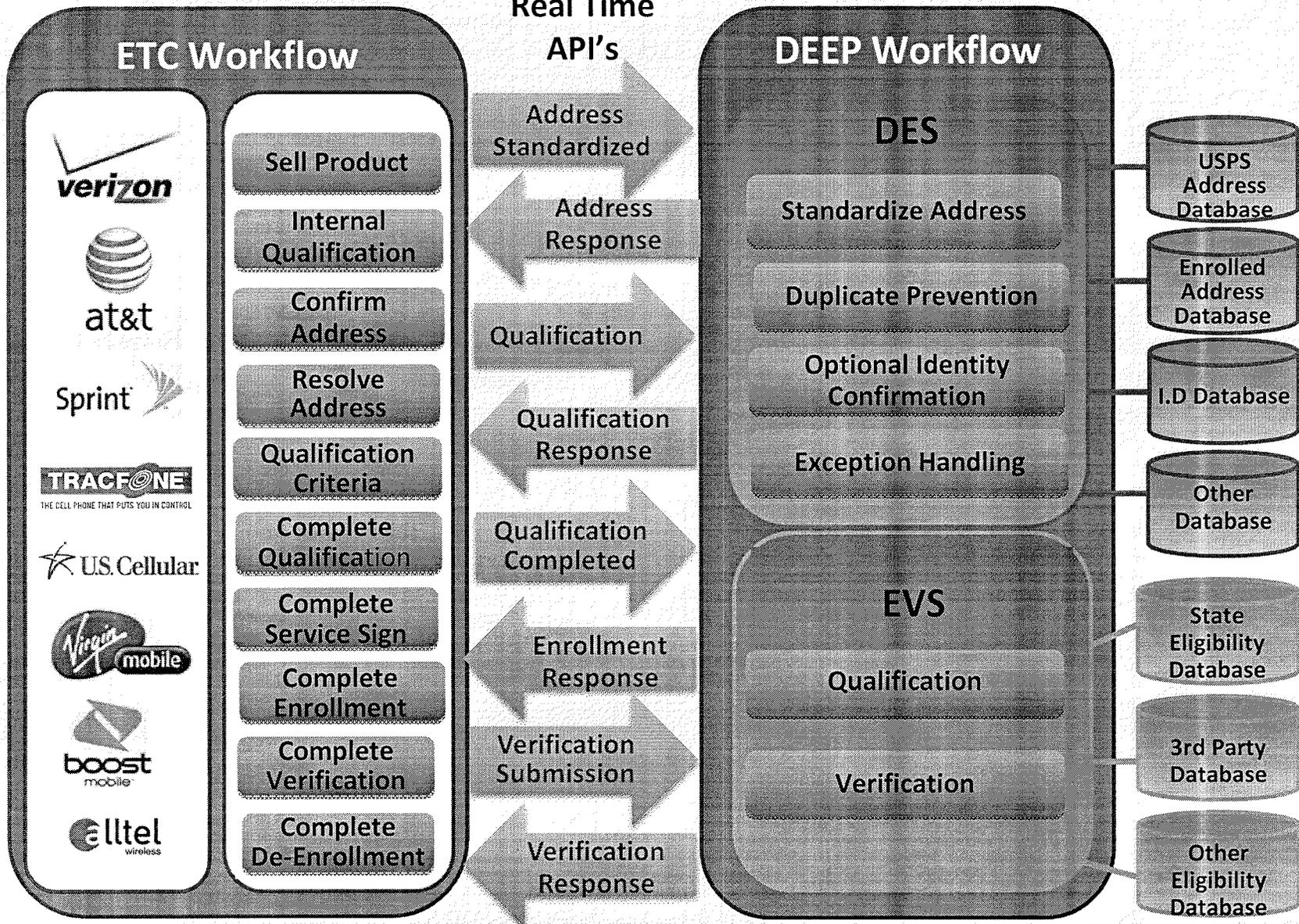
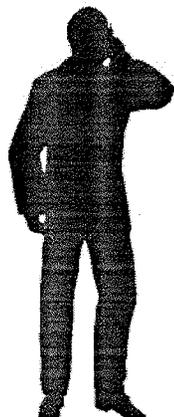
Overview of System Requirements

- Must support ETC's multiple channels for enrollment and response within their own workflow without the need to hand off the consumer to a third party.
- Existing Workflow Enablement – should allow for 1,900+ ETCs to continue their existing processes whereby a consumer is presented options and credit qualifications are handled.
- Real Time API Actionable Response – ETCs need to be able to resolve consumer related qualification issues in real time to enable competition and improve customer service.
- Real Time Carrier Choice – system API should support the process for a consumer to change carriers while interacting via the phone, web or other approved channel

Lifeline Modernization and Reform:

Overview of System Requirements

- Must contain a Dynamic Rules Engine that configures process rules which allow for and respond to different rules on a State by State basis
- Is built with a Dynamic Data Exchange that allows for communication of data either through a batch or real time process between the DEEP Solution and outside systems
- System must reduce waste, fraud and abuse by eliminating duplication, ensuring right party contact and automating or streamlining eligibility and annual verification procedures
- Should be able to deploy quickly and at low cost in order to realize immediate savings for the USF.



Appendix

- Terms
- Web Service Application Programming Interface
- Reporting Requirements
- Security and Infrastructure Requirements

Terms

- Duplicate Elimination System (DES): is the national, real-time module which contains all of the components necessary for an ETC through a real time API to facilitate the pre-qualification of Lifeline beneficiaries; single household benefit, right party verification, carrier preference handling and escalation procedures.
- Eligibility and Verification System (EVS): is the automated, real-time module which contains all of the components necessary for an ETC through a real time API to confirm eligibility of a consumer for the purpose of qualifying and continuation of lifeline benefits through an automated annual verifications for Lifeline beneficiaries within those states that enable real time access to their qualification databases.

Terms

- Duplicate Elimination and Eligibility Platform (DEEP): contains both the DES and EVS modules which will streamline and automate the eligibility and verification requirements set forth in the Lifeline Reform Recommendations
- Web Service or Application Programming Interface (API): is a particular set of rules and specifications that software programs can follow to communicate with each other. For this solution, an API will be utilized for communication between the ETCs customer facing solution and the DEEP solution.

Deep Web Service Real-Time API

- Enables ETCs to Enhance Existing Workflows
 - Supports Multi-Channels, Web, IVR, CSR, etc.
 - Multiple Inquiry Points – address confirmation, ID Verification, qualification confirmation, enroll, de-enroll.
 - Does not require ETCs to hand over workflow to third party.
- Reduces Costs to ETCs
 - Enable one contact qualification and enrollment
 - Reduce need for mailings
 - Enable ETC agents to resolve in real time.
- Improves Experience for Consumers
 - Enables immediate issue resolution.
 - Enables more competitive offerings.

DEEP External APIs – Technical Aspects

- Real-Time API
 - Secure Http REST based Web Services.
 - Authentication support for user/password and certificates.
 - API KEY Design Pattern http://en.wikipedia.org/wiki/API_key
- Batch API
 - Implemented as file transfers.
 - Using secure channels (SFTP, FTPS, SSL, etc.)
 - Process always uses two files (request/response)
 - Batch identification with reprocessing capabilities.
 - Common file formats supported (csv, tsv, xml, etc)

DEEP Real-Time API Functionality

- ADDRESS VERIFY
 - Receives and conveys standardized address.
 - Runs the duplicate detection process.
- QUALIFY
 - Confirms qualification or returns codes.
- ENROLL+/-
 - Submits new enrollments or flags existing Enrollment to be De-Enrolled.
- VERIFICATION
 - Updates verification status.
- QUERY
 - Return information about existing persons or transactions.
- UPDATE



DEEP Monitoring API

- **GETSTATUS:** returns information about the platform or a particular module
 - Core Operational status: UP, Maintenance, Performance Issues, Down.
 - List of additional or optional modules Operational Status
- Status Web Page
 - Displays the information provided by the API for human consumption on an application basis through the reporting module.

Reporting Requirements

- Online reports should provide a summary of information on behalf of ETCs all pertinent regulatory agencies.
- ETCs must have access to summary and detail on their account representing monthly activity and individual application detail.
- Vendor should assure that proper and accurate information is developed and prepared in a manner that enables easy audit completion
- The information should be retained as long as required by each regulatory agency

Infrastructure & Security Requirements

- System must have high availability and able to handle peak loads of 500,000 plus inquiries a day.
- System must have dedicated servers and redundancy
- System must have high fault tolerance levels
- Vendor must deliver SLA's of at least 99.9% to ensure program delivery and effectiveness.
- Entity must be FISMA compliant with 1 year of contract