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June 15, 2011

VIA ELECTRONIC FILING

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

Re: *Lifeline and Link Up Reform and Modernization; Federal-State Joint Board on Universal Service; Lifeline and Link Up*; WC Docket Nos. 11-42 and 03-109; CC Docket No. 96-45; Notice of Ex Parte Presentation

Dear Ms. Dortch:

On June 13, 2011, the undersigned counsel for Cricket Communications, Inc. (“Cricket”) participated in the Low Income Database Discussions convened by the Commission in the above-referenced proceedings. In addition, the Discussions were attended by the Commission staff copied below and the industry representatives listed in Exhibit A.

The Discussions focused on the development of a database solution that could be used by eligible telecommunications carriers (“ETCs”) to (i) identify instances in which existing or prospective low-income customers are receiving or would receive duplicative Lifeline support and (ii) establish whether an existing or prospective low-income customer is otherwise eligible to receive such support. Consistent with its comments in this proceeding, Cricket fully supports the creation of a database of this type. At the same time, Cricket urges the Commission to exercise care in designing and implementing any such database to ensure that it reduces, rather than exacerbates, the costs and complications that ETCs face in administering the Lifeline program.

For example, the Commission should not require ETCs to rely on any Lifeline database that contains only a subset of relevant eligibility data in a given state. As Cricket noted during the Discussions, some states (*e.g.*, Maryland) currently aggregate data that reflects resident participation in only a subset of qualifying need-based programs. Other states are likely to populate the relevant Lifeline database in stages. To the extent that ETCs (as opposed to a third-party administrator) remain responsible for determining the eligibility of Lifeline customers, any requirement for ETCs to employ a variety of different online and offline mechanisms to determine program participation would likely multiply compliance burdens and introduce errors, contrary to the intended purposes of a database solution. It would make more sense to transition to a database solution for verifying eligibility only when a state has made all relevant program data available or if a third-party administrator takes on the function of accessing the various state databases.

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In addition, the Commission should not require ETCs to upload subscriber information to any Lifeline database in real time. Any such mandate would impose substantial development costs on ETCs. In particular, Cricket does not have any means of electronically bonding with the databases maintained by third-party administrators in real time (such as Solix, in California), and developing such capabilities—particularly for multiple databases/administrators—would entail considerable investment in new IT systems. Forcing ETCs (which rely on a variety of different billing systems) to bear such expenses would curtail their ability to participate in the Lifeline program. Cricket believes that ETCs should be permitted to rely on batch processing to update the relevant database(s) on a regular basis. Cricket relies on such file-transfer procedures in California today, and, while they require significant manual processing, they are far more cost-effective than developing customized electronic interfaces. Once ETCs serve a large number of Lifeline customers in a state, they may have incentives to develop electronic interfaces, but the Commission should not mandate real-time updates where they would be cost-prohibitive.

Please contact the undersigned should you have any questions.

Respectfully submitted,

/s/ Matthew A. Brill

Matthew A. Brill

Jarrett S. Taubman

Counsel to Cricket Communications, Inc.

cc: Zachary Katz
Kimberly Scardino
Jonathan Lechter
Cindy Spiers

Exhibit A

Name	Affiliation
Michael Quinn	Solix
Eric Sequin	Solix
Stuart Waldrom	Solix
Norina Moy	Sprint
Mitchell Brecher	Greenberg Traurig (Tracfone)
Javier Rosado	Tracfone
John Nakahata	Wittshire Gramis (GCI)
Donald Kratt	3PV
David Brinkman	3PV
Cathy Carpino	AT&T
Mike Tam	AT&T
Mary Henze	AT&T
Jerry James	COMPTEL
Barrett Sheridan	NASUCA
Frank Delcol	TAG Wireless
Chuck Schneider	dPi Teleconnect
Mary Albert	COMPTEL
Andrew Karl	Sage Telecom
Terri Kruse	ATMS
Matt Connolly	Yourtel America
Thomas Cohen	Emerios (Kelley, Drye)
Jesse Crowe	Emerios
Joe Cox	Emerios
Ron Renjilian	Emerios
Alan Buzacott	Verizon
Karen Majcher	USAC
Pamela Gallant	USAC
Ken Eisner	One Economy
Chuck Campbel	CGM, LLC
Kevin Murphy	CGM, LLC
Eric Robeson	West
Danielle Frappier	DWT/Nexus
Scott Bergmann	CTIA
Jamie Tan	AT&T