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July 8, 2011

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

**Re: TAG Mobile, LLC and dPi Teleconnect, LLC Ex Parte Letter
WC Docket Nos. 11-42, 03-109**

Dear Ms. Dortch:

TAG Mobile, LLC f/k/a dPi Mobile, Inc. (“TAG”) and dPi Teleconnect, LLC (“dPi”) support the Federal Communications Commission’s (“FCC” or “Commission”) proposals to reform the Lifeline and Link Up programs. TAG and dPi applaud the Commission’s recent adoption of the interim order designed to reduce waste, fraud and abuse in these programs by establishing procedures to reduce duplicate supports.

TAG and dPi also support the Commission’s proposal to establish a centralized Lifeline eligibility and fraud management platform that would allow for online certification and verification of new customers and thereby reduce the vast majority of duplicate payments and all types of waste, fraud and abuse.¹ Specifically, TAG and dPi recommend the adoption of a national program that uses third-party database verification procedures. Currently, carriers already can utilize a third-party database from the U.S. Postal Service, which allows them to verify the name and address of prospective customers.

A single Lifeline management platform that employs eligibility data and duplicate-checking data would eliminate the need for self-certification by individuals and would prevent duplicate payments caused by intentional or unintentional falsification of self-certification forms.

Furthermore, until a national automated eligibility verification platform is implemented, TAG and dPi urge the Commission to adopt electronic signature procedures AND third party verification procedures as viable alternatives for paper self-certification forms.

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. 1142 and 03-109 and CC Docket No. 96-45, FCC 11-32 at ¶ 205 (rel. March 4, 2011).

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The use of e-signatures and third party verifications would significantly streamline the procedure to sign up customers. We believe the third party verification process would actually provide more protection against fraud in the interim period prior to the implementation of an eligibility verification and duplicate-check platform, in that end-users would be less likely to request a duplicate or invalid subsidy if they were being recorded while answering a number of validating questions. This process worked well in managing fraud in the long distance/PIC change arena.

E-signature and third party verification would also allow carriers to more efficiently allocate limited resources. Specifically, adoption of e-signature procedures would reduce carriers' dependence on agents to sign up customers and thereby allow them to reallocate these resources to services for customers. As the Commission has acknowledged, federal law provides that electronic signatures and third party verifications have the same full force and effect as written signatures,² and the Commission has already adopted rules regarding the uses of e-signatures.³ Those rules could easily be adopted and applied to these services.

TAG and dPi look forward to the Commission's further action in this proceeding and urges the adoption of a national online eligibility verification and duplicate-check platform, as well as e-signature and third party verification procedures for certifying Lifeline and Link Up end users.

Sincerely,

/s/ Douglas D. Orvis II

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Kimberly A. Lacey

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² *Id.* at ¶ 224.

³ *See e.g.*, 47 C.F.R. §§ 64.1130(i) and 64.1120(c)(3).