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October 3, 2011

VIA ECFS

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

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

Dear Ms. Dortch:

The Link Up for America Coalition (“Coalition”), through its attorneys, hereby submits the enclosed Code of Conduct and voluntary Interim De-Duping Process self-regulatory initiatives designed to produce a significant near-term reduction in waste, fraud and abuse in the Commission’s Lifeline and Link Up programs.

On September 14, 2011, the Coalition informed the Commission that it was developing a voluntary Code of Conduct aimed at ensuring that reasonable and adequate controls are implemented to eliminate duplicates before requests for Link Up reimbursement are submitted.¹ The Coalition is pleased to inform the Commission that it has finalized its Code of Conduct. The code was based largely on the conditions that the Commission has imposed on other ETCs in the context of forbearance petitions to address duplicate benefits. Each member of the Coalition, as well as two additional CETCs, have signed-on to voluntarily participate and comply with the requirements of the code of conduct as of October 1, 2011.² Together, these CETCs represent a majority of new monthly Link Up-supported Lifeline customers.³

¹ See *Ex Parte* Presentation of the Link Up for America Coalition, WC Docket No. 11-42 et al. at 1 (Sept. 14, 2011) (“Coalition September 14th *Ex Parte*”).

² Coalition members now include Assist Wireless, Global Connections of America, Midwestern Telecommunications (MTI), NewPhone, Ready Wireless, Tag Mobile, Telrite (Life Wireless), Absolute Home Phones and Affordable Phone. In addition,

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The Coalition also confirmed in its September 14th *Ex Parte* that it was working to develop a voluntary, independent, Interim De-Duping Process modeled on the Commission's long-term proposed database solution.⁴ The Coalition, working with CGM, LLC has developed such an interim process. Each of the participants is already undertaking the processes defined in sections a-e of the attached process document and the pooled, pre-sale, dupe-check database discussed in section f is scheduled to become available by November 1, 2011. This Interim De-Duping Process is already in BETA testing.

These new self-regulatory initiatives will significantly reduce incidents of duplication in the Lifeline and Link Up programs – and the full effect of the associated costs savings should be realized starting November 1, 2011. This year Coalition members have received nearly half of the total Link Up dollars disbursed and the Coalition's percentage of Link Up and Lifeline funding is increasing every month.⁵ That means that these voluntary self-regulatory efforts undertaken by the Coalition, as well as other CETCs, can significantly reduce incidents of duplication and waste, fraud and abuse in the Commission's low-income programs.

According to an analysis from CGM, LLC, these voluntary efforts will save the Link Up program almost \$900,000 in the first month, and the savings will increase by an average of almost \$430,000 each month thereafter.⁶ Therefore, the savings in the second month are expected to be over \$1,200,000; the third month over \$1,600,000; the fourth month nearly \$2,100,000; and the fifth month over \$2,600,000, and so on.⁷

The Coalition is pleased to be able to offer these self-regulatory solutions to the Commission as it grapples with the challenges of reforming the historically successful and increasingly less underutilized Link Up and Lifeline programs. Through these actions, Coalition members have demonstrated a commitment to work hand-in-hand with the Commission and other interested parties to address the challenge of putting low-income funding to good use and with maximum effect. The Coalition welcomes other CETCs to sign-on to its Code of Conduct and to join in the voluntary interim de-duping initiative or by creating one like it. We look forward to working with the Commission to ensure that Link Up remains essential and to ensure that adequate controls are in place to eliminate waste fraud and abuse.

TerraCom and YourTel have signed-on and are committed to abide by the Code of Conduct.

³ See Declaration of Chuck Campbell enclosed at 1.

⁴ See *id.*

⁵ See Declaration of Chuck Campbell at 1.

⁶ See *id.* at 2.

⁷ *Id.*

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In accordance with the Commission's rules, this letter is being filed electronically for inclusion in the public record of the above-referenced proceedings.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John J. Heitmann". The signature is written in a cursive style with a large initial "J" and "H".

John J. Heitmann
Joshua T. Guyan

Enclosures

cc: Kim Scardino

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 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

DECLARATION OF CHUCK CAMPBELL

1. My name is Chuck Campbell and I am Principal of CGM, LLC (“CGM”), which is a Lifeline editing and data processing service bureau based in Roswell, Georgia. I submit this Declaration in support of the Link Up for America Coalition (“Coalition”) *ex parte* in the above-captioned proceeding.

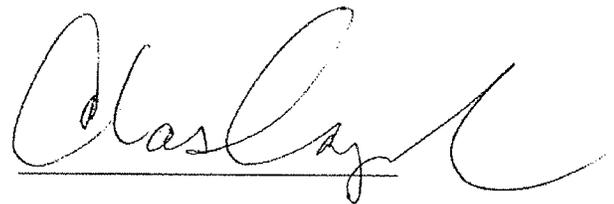
2. CGM works with the members of the Coalition to provide monthly edits to ensure that its clients’ data remains in compliance with the Commission’s low income fund requirements. According to CGM’s analysis of Lifeline and Link Up disbursements, together the members of the Coalition represent nearly half of new monthly Link Up-supported Lifeline customers. In July, 2011, the latest month for which analysis was completed, the Coalition members signed up 86,485 of the 190,905 new Link Up customers (45%).

3. CGM’s analysis shows that, in 2011, Coalition members have received nearly half of the total Link Up dollars disbursed to wireless service providers. For example, in July, the latest month for which analysis was completed, the Coalition members received \$2,583,399 in Link Up out of the total \$5,702,867 disbursed, which is 45%.

4. Based on CGM’s analysis, the Code of Conduct and voluntary Interim De-Duping Process enclosed with the Coalition *ex parte* will save the Link Up program a total of \$8,465,607 between November 1, 2011 and March, 2012. Monthly savings are based on preventing an estimated 20% duplicate-rate on prospective lifeline customers over each of the next five months – the time we estimate it will take to implement the first phase of a National Duplicate Database. The monthly savings breakdown is as follows: \$893,389 in November, 2011; \$1,241,210 in December, 2011; \$1,637,592 in January, 2012; \$2,089,314 in February, 2012; \$2,604,102 in March, 2012.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my information and belief.

Executed on October 3, 2011



Chuck Campbell

LINK UP FOR AMERICA COALITION VOLUNTARY LIFELINE AND LINK UP CODE OF CONDUCT

The members of the Link Up for America Coalition¹ have agreed to voluntarily comply as of October 1, 2011 with the following principles designed to protect against waste, fraud and abuse of the Lifeline and Link Up programs,² specifically to combat duplication of benefits.

First, member marketing materials clearly state that the service is Lifeline-supported.

Second, members explain in clear and plain language to new customers that they may not receive more than one Lifeline supported service.

Third, members require all Lifeline applicants to provide information for an internal name and address duplicate cross-check.

Fourth, members require all Lifeline applicants to confirm on the application form that he or she is not receiving Lifeline supported service from any other Lifeline provider.

Fifth, members require all Lifeline applicants to self-certify that they receive Lifeline services only from the member.

Sixth, members make the ultimate decision regarding certification and verification to enroll a subscriber for Lifeline service.

Seventh, members fully cooperate with the Commission, USAC and state public utility commissions to detect and resolve duplicate Lifeline claims.

Eighth, members make available subscriber data to USAC and state public utility commissions upon request to protect against duplication.

Ninth, if a member discovers that a customer is receiving duplicate service, it will inform the customer that it must choose one service provider.

Tenth, members de-enroll Lifeline subscribers that the member knows are no longer eligible or that do not use their Lifeline service for more than 60 days after notice and a 30 day grace period, or as otherwise required by a state public utility commission.

¹ Current Coalition members are Assist Wireless, Global Connections of America, Midwestern Telecommunications (MTI), NewPhone, Ready Wireless, Tag Mobile and Telrite (Life Wireless). The Coalition welcomes other Lifeline and/or Link Up recipients to voluntarily comply with these principles. Additional ETCs voluntarily committing to comply with these principles include: TerraCom and YourTel.

² References to Lifeline are inclusive of the Link Up program.

LINK UP FOR AMERICA COALITION
VOLUNTARY LIFELINE AND LINK UP PROCESS TO ADDRESS DUPLICATE PROVISION
OF LIFELINE AND LINK UP

CGM, LLC, is a Lifeline editing and data processing service bureau based in Roswell, Georgia. CGM provides the following monthly services to ensure that its clients' data remains compliant with the Commission's non-duplication Lifeline requirements.

a. Valid Address Confirmation: Subscriber addresses are checked against USPS and MELISSA databases to confirm their existence and normalize text.

b. Wireline Double-Dip Edit: Each month, prior to calculating the total of subsidy reimbursements to be requested via the federal 497 form, CGM's systems compare the list of subsidies given by a client to the detail of the client's underlying wireline carrier invoice. This edit identifies any and all lines for which the client has received a Lifeline discount/subsidy from the underlying carrier. All such lines are then edited out of the file that will be used to complete the federal 497 form. This edit insures that clients will never request a subsidy for the same line, in the same month, from both an underlying carrier and USAC.

c. Same-Month Lifeline Edit: CGM's systems also edit for duplicate Lifeline subsidies given to the same address in a single month, across an ETC's entire platform (wireline and wireless). This ensures that an ETC client will never request two Lifeline subsidies for the same address in the same month.

d. Duplicate Historical Link-up Edit: CGM builds a unique historical data file for each of its clients. This file contains name and address detail of every Link Up subsidy ever requested by this client. All current-month Link Up reimbursement data is processed through this data file prior to inclusion on a federal 497 form. All historical duplicates are edited out. This ensures that the client will only provide a single Link Up subsidy to a name/address combination, at any time.

e. Active Line Edit: Each month, CGM confirms that all lines for which federal reimbursement is to be requested are active lines on the client's/underlying carrier's network. As such, a client will never request reimbursement for lines that have been terminated in previous months.

f. Pooled, Pre-Sale, Dupe-Check Database: Effective November 1, 2011, CGM will provide ETCs access to a front-end, duplicate check database containing pooled Lifeline subscriber data from CGM customers that choose to participate in this program. Participating ETCs will query this database in real-time, prior to provisioning new service, to prevent duplicate subsidies from being extended to existing Lifeline subscribers. No customer proprietary network information will be passed; rather, dipping-ETCs will receive positive or negative confirmation about the existence of an active name/address combination.