

October 19, 2011

VIA ELECTRONIC FILING

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

Re: WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization
CC Docket No. 96-45 - Federal-State Joint Board on Universal Service
WC Docket No. 03-109 - Lifeline and Link Up
NOTICE OF EX PARTE PRESENTATION

Dear Ms. Dortch:

On October 18, 2011, Javier Rosado - Senior Vice President - Lifeline Services, TracFone Wireless, Inc. and undersigned counsel on behalf of TracFone, had a telephonic discussion with Kimberly Scardino, Jamie Susskind, and Jonathan Lechter, each of the Wireline Competition Bureau Telecommunications Access Policy Division. During this telephonic meeting, we discussed TracFone's proposals for preventing waste, fraud and abuse of Universal Service Fund resources. Specifically, we discussed the bases for TracFone's calculations that its proposals could reduce low income support payments by \$760 million per year as set forth in undersigned counsel's October 17, 2011 ex parte letter filed in this proceeding.

We explained that the estimated savings resulting from requiring all Eligible Telecommunications Carriers to obtain from applicants for Lifeline enrollment customer date of birth and Social Security number (last 4 digits) (\$192 million), from requiring ETCs to require all Lifeline customers to self-certify their continuing Lifeline eligibility annually (\$270 million) and from disconnecting from Lifeline service customers who do not use the service for 60 days or who do not pay for their bills for 60 days (\$230 million) were based on the percentages of applicants which TracFone does not enroll in its Lifeline program (400,000 for every 2.0 million), the percentage of customers which it de-enrolls for failure to self-certify continuing Lifeline eligibility (26%), and the percentage of customers which it de-enrolls pursuant to its 60 day non-usage policy (24%). TracFone then applied the verification and non usage percentages to the estimated entire base of Lifeline customers served by all ETCs, excluding TracFone customers and projected the potential disqualified customers from customer date of birth and Social Security number (last 4 digits) to the estimated future Lifeline enrollments for the next 12 month period.

We also discussed how and whether compliance plans of TracFone and other ETCs who received forbearance from the Commission should be modified or waived if the Commission promulgates rules governing Lifeline eligibility certification and verification which supersede forbearance conditions.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. Please direct any questions regarding this letter to the undersigned.

Sincerely,



Mitchell F. Brecher

cc: Ms. Kimberly Scardino
Ms. Jamie Susskind
Mr. Jonathan Lechter