

November 16, 2011

***Via Electronic Filing***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: *Ex Parte* Presentation, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45**

Dear Ms. Dortch:

On November 14, 2011, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, and Scott Bergmann, Assistant Vice President, Regulatory Affairs, both of CTIA – The Wireless Association® (“CTIA”), met with Kim Scardino, Jonathan Lechter, Jamie Susskind, and Garnet Hanly of the Wireline Competition Bureau. CTIA’s members, as providers of Lifeline/Link Up benefits to millions of consumers, share the Commission’s desire to modernize the low income universal service program to meet changing consumer needs in a cost-effective and responsible manner. During the meeting, CTIA discussed critical elements of the effort to modernize the low income universal service program, consistent with CTIA’s past comments in this proceeding.<sup>1</sup>

In particular, CTIA expressed support for the development of a national database for tracking consumer eligibility for low-income Lifeline support. A national consumer eligibility database is among the most effective ways to improve administration of the Lifeline/Link Up programs because it would assign program functions to parties who are best able to perform them. We also discussed the benefits of a framework under which states, through designated entities, would be responsible for determining whether a particular consumer is eligible for Lifeline support.

CTIA also urged the Commission to adopt proposals that are administratively feasible and consistent across providers on a competitively-neutral basis. CTIA encouraged the Commission to retain its one-per-qualifying-individual rule while it develops a national eligibility database, and to adopt a uniform, rationalized Lifeline discount amount that is not tied to the incumbent local exchange carrier’s (“LEC”) subscriber line charge (“SLC”). CTIA also encouraged the Commission not to adopt overly burdensome annual verification requirements, or to impose mandatory minimum charges for Lifeline service that would harm low-income consumers. In addition, CTIA

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<sup>1</sup> See Comments of CTIA-The Wireless Association® (“CTIA”), WC Docket No. 11-42, filed on April 21, 2011 (“CTIA NPRM Comments”); Reply Comments of CTIA, WC Docket No. 11-42, filed on May 10, 2011 (“CTIA NPRM Reply Comments”); Reply Comments of CTIA, WC Docket No. 11-42, filed on September 2, 2011 (“CTIA Further Notice Reply Comments”).

urged the Commission to focus on strengthening its management of the program through the reforms described above, before making determinations about the appropriate level of support for the program.

Finally, CTIA reiterated its support for the creation of time-limited and optional pilot programs to explore bringing broadband into the Lifeline Program. As CTIA has previously noted, any broadband pilot program must be competitively and technologically neutral, and should empower consumers to choose the broadband service that best suits their needs.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

*/s/ Scott K. Bergmann*

Scott K. Bergmann

cc: Kim Scardino  
Jonathan Lechter  
Jamie Susskind  
Garnet Hanly