



December 12, 2011

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

Re: *Ex Parte* disclosure pursuant to 47 CFR § 1.1206(b) in WC Docket No. 11-42; WC Docket No. 03-109;  
CC Docket No. 96-45

Dear Ms. Dortch:

On Thursday, December 8 I held a brief telephone conversation with Angie Kronenberg of Commissioner Clyburn's office about the above-captioned docket. I reviewed with Ms. Kronenberg some of the comments the United Church of Christ has made as part of the Leadership Conference on Civil and Human Rights filings in this docket.

In particular, I emphasized we believe that no-cost wireless phones fulfill an important need in the low-income community, but that the Commission should take steps to ensure that scarce public resources are being directed to adequate offerings. I encouraged Commissioner Clyburn's office to support a minimum number of minutes for wireless, no-cost Lifeline offerings. I also explained that the most important element of attacking fraud and abuse is to ensure that the individuals employed to market the phones receive direct incentives from their employers to ensure that all Lifeline recipients are eligible.

I also explained that we believe the Commission should expand Lifeline to broadband services to keep pace with the expansion already made for rural and high cost areas earlier this year. I expressed concern on behalf of the UCC that low income people could be required to continue using old technology while the rest of the world moves to high speed Internet. I encouraged the Commission to make ample use of its existing legal authority to expand the Lifeline program and to move ahead as quickly as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl A. Leanza', written in a cursive style.

Cheryl A. Leanza  
Policy Advisor  
United Church of Christ, OC Inc.