January 18, 2012

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20554

Re: Ex Parte Communication
WC Docket No. 11-42

Dear Ms. Dortch:

Yesterday, Charles McKee and I of Sprint Nextel Corp. met with Christine Kurth of Commissioner McDowell's office to discuss the Lifeline USF program. Consistent with its filings in the above-captioned proceeding,[1] Sprint raised the following points:

First, Sprint urged that the Low Income fund not be capped, because such action would be contrary to the goal of ensuring universal service to the most economically vulnerable Americans, and because enforced rationing of this benefit would present serious implementation problems. Sprint also suggested that the recent growth in the Lifeline fund might be slowed by implementation of a national duplicates database and other reforms to address program inefficiencies.

Second, Sprint expressed its opposition to proposals to require Lifeline subscribers to pay some dollar amount each month towards their Lifeline service, since such a requirement could constitute a substantial burden on this market segment (a large percentage of which does not have a checking account, debit card, credit card, or other payment vehicle, and for whom a payment of even a few dollars a month could be a genuine hardship). This proposal also would impose an administrative and financial burden on prepaid wireless Lifeline service providers which do not send out monthly invoices.

Third, if the Commission were to adopt a rule requiring proof of eligibility from potential Lifeline subscribers, Sprint recommended collection of such documentation during the application process, with self-certification of on-going eligibility during the annual verification process. Sprint noted that eligibility documentation could include highly personal and confidential information and that it would be inappropriate to require the ETC to retain such information. Further, Sprint urged that any eligibility documentation be required only of prospective, not existing, Lifeline customers.

[1] *See, e.g.*, Sprint's comments filed April 21, 2011; reply comments filed May 10, 2011; and ex parte letter dated November 18, 2011, in WC Docket No. 11-42.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced docket. If you have any questions, please feel free to contact me at (703) 433-4503.

Sincerely,

/s/ Norina T. Moy

Norina T. Moy
Director, Government Affairs

c: Christine Kurth