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January 23, 2012

Via ECFS

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

Re: Notice of ex parte presentation
Lifeline and Link Up Reform – WC Docket Nos. 03-109, 11-42

Dear Ms. Dortch:

This is to provide notice, pursuant to the Commission's ex parte rules, that T-Mobile met with Commission staff regarding Lifeline and Link Up reform in the above-referenced dockets. On January 19, 2012, T-Mobile met separately with Christine Kurth, policy director and wireline counsel to Commissioner Robert McDowell, and Angela Kronenberg, legal advisor to Commissioner Mignon Clyburn. On January 20, 2012, T-Mobile met with Zachary Katz, chief counsel and senior legal advisor to Chairman Julius Genachowski, and Sharon Gillett, Carol Matthey, and Kimberly Scardino of the Wireline Competition Bureau. In all three meetings, T-Mobile was represented by Kathleen O'Brien Ham and Luisa Lancetti of T-Mobile and outside counsel L. Charles Keller of Wilkinson Barker Knauer, LLP.

The discussion in the meetings followed the attached presentation, which was distributed to the meeting attendees.

As noted in the presentation, T-Mobile argued that the Commission should establish more stringent standards for the designation of Lifeline ETCs, to ensure that Lifeline is provided by carriers with sufficient incentives to comply with the Commission's rules. In this regard, T-Mobile proposes that Lifeline ETC applicants should be required to make showings of financial and technical capability to provide the supported services (including consideration of whether the carrier offers services in addition to Lifeline service) in order to be designated as Lifeline ETCs. Carriers holding spectrum licenses obtained at auction or in secondary markets, and using those licenses to operate wireless systems, should be presumed to have made the requisite showing.¹

¹ If it wished, the Commission could establish a similar presumption for wireline carriers – for example, for any carrier holding a certificate of public convenience and necessity from a state public utilities commission and utilizing its own facilities to provide local exchange service.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/

Luisa L. Lancetti

Enclosure

cc (email): Zachary Katz
Christine Kurth
Angela Kronenberg
Sharon Gillett
Carol Matthey
Kimberly Scardino