

January 24, 2012

***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 January 23, 2012, Christopher Guttman-McCabe, Vice President, Regulatory Affairs, CTIA – The Wireless Association® (“CTIA”) spoke with Angela Kronenberg, Legal Advisor to Commissioner Mignon Clyburn and left a telephone voice message for Zac Katz, Chief of Staff to Chairman Julius Genachowski regarding reform of the Commission’s Low Income Universal Service support mechanisms. In addition, Scott Bergmann, Assistant Vice President, Regulatory Affairs, CTIA left a telephone voice message for Christine Kurth, Legal Advisor to Commissioner Robert McDowell, regarding the same. During these conversations, CTIA encouraged the Commission to reform the low income programs in a manner that preserves wireless options for low income consumers and updates program rules in an administratively feasible manner.

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. Consistent with past comments in this proceeding, CTIA expressed support for the development of a national database for tracking consumer eligibility for low-income Lifeline support.<sup>1</sup> 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. Alternatively, the Commission could adopt a framework empowering states, through designated entities, to be responsible for determining whether a particular consumer is eligible for Lifeline support.

CTIA noted that it would be preferable for the Commission to adopt an eligibility database, or to encourage states to adopt their own eligibility databases, rather than imposing costly verification obligations on carriers. To the extent, however, that the

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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”).

Commission does not adopt a database approach to guide eligibility decisions, CTIA encourages the Commission to provide a sufficient implementation period to allow eligible telecommunications carriers to revise their practices and for interested states to develop their own eligibility databases.

CTIA urges the Commission to adopt proposals that are administratively feasible and consistent across providers on a competitively-neutral basis. CTIA also encourages the Commission not to adopt overly burdensome annual re-verification requirements, or to impose mandatory minimum charges for Lifeline service that would harm low-income consumers. In addition, CTIA has 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.

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: Zac Katz  
Angela Kronenberg  
Christine Kurth