



January 26, 2012

**Ex Parte Notice – Exempt from Sunshine Prohibition Pursuant to 47 CFR § 1.1203(a)(1), 1.1204(a)(10)**

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

Re: *Lifeline and Link-Up*, WC Docket No. 03-109; *Lifeline and Link Up Reform and Modernization*, WC Docket 11-42

Dear Ms. Dortch:

On January 26, 2012, at approximately 3 pm, on behalf of General Communication, Inc., I spoke with Angela Kronenberg, Wireline Legal Advisor to Commission Clyburn, at her request. I stated that GCI believed that it was unnecessary for the Commission to mandate that carriers reverify the address of subscribers with temporary addresses. As stated in my ex parte letter of January 24, 2012, it would be very rare for an individual with a temporary address, such as a homeless shelter, be moving into a permanent residence with another Lifeline subscriber with whom they then merged into a single economic unit with shared income and expenses. Moreover, to the extent the Commission seeks to prevent a single individual from obtaining multiple Lifeline subscriptions, that would be much more efficiently accomplished by collecting other identifying information, such as the last four digits of the Social Security Number or date-of-birth, and using that information to identify potential duplicate subscribers for further follow-up.

Indeed, to the extent that the Commission is also mandating the collection of the last four digits of the Social Security Number and/or date-of-birth, it would violate the Paperwork Reduction Act to mandate reverification of address of individuals with a temporary address prior to using other identifying information to determine whether it is likely that the individual is a person with duplicate Lifeline subscriptions, notwithstanding different addresses. The Paperwork Reduction Act requires the Commission to use information that it has or is already collecting, if adequate for the purpose, prior to sponsoring an additional collection. Here, if SSN

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or date-of-birth are being collected, they provide a means of checking duplicate individuals that is superior to simple name and address matching.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata". The signature is fluid and cursive, with a long horizontal stroke at the end.

John T. Nakahata

*Counsel to General Communication, Inc.*

cc: Angela Kronenberg