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March 8, 2012

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW  
Washington, DC 20554

**Re: *Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link Up, WC Docket No. 03-109***

Dear Ms. Dortch:

On March 1 and 8, I spoke to Kim Scardino of the Wireline Competition Bureau about the Commission's recent *Lifeline Modernization Order*, FCC 12-11. I suggested several topics for consideration in the event that the Commission decides to issue a *sua sponte* order on reconsideration/clarification. The topics included:

- A delay of the effective date of the new flat rate discount amount to account for state tariffing/customer notification requirements and billing changes;
- A delay of the effective date of the elimination of the Link-Up discount in those states where Link-Up is tariffed;
- Clarifying that new rule 54.422 applies only to federally designated Lifeline-only ETCs;
- Clarifying that ETCs must deny Lifeline service to any customer that fails to provide his/her date of birth or last four digits of his/her social security number, and if a state prohibits ETCs from obtaining this information from customers, the Commission is preempting that state;
- Clarifying that it is permissible for an ETC to continue to use P.O. boxes for existing Lifeline subscribers until the ETC obtains that subscriber's residential address via the annual recertification process;
- Clarifying that ETCs do not need to follow up with a subscriber at a "temporary address" if the ETC is issuing a monthly bill to that customer at that address and the customer is making monthly payments;
- Clarifying that in those states where the state or its designee performs annual recertification functions on behalf of the ETCs in that state, the state or its designee should maintain copies of the forms and provide the results directly to USAC and the Commission (versus providing copies of the forms to the ETCs);
- Clarifying whether ETCs should obtain just the last four digits of a subscriber's "Tribal government identification card number";
- Clarifying that new rule 54.407(d) does not prevent an ETC currently operating in an automatic enrollment state from certifying that it is compliance with the Commission's

Lifeline rules notwithstanding the fact that it has not obtained customer certification forms from each of the subscribers for whom it is seeking reimbursement;

- Clarifying that ETCs do not have to obtain service initiation dates and the basis for the customer's eligibility (e.g., Medicaid, income) for existing Lifeline subscribers;
- Clarifying that the Commission is preempting states that do not permit ETCs from offering Lifeline customers bundled service offerings that include voice telephony service; and
- Clarifying that an ETC that provides a Lifeline customer with a bundle needs to inform its customer just once that partial payments will be applied toward voice services versus providing this notification on every bill, which could serve as a disincentive to providers.

Please do not hesitate to contact me with any questions,

Sincerely,

/s/ Cathy Carpino  
Cathy Carpino

cc: Kim Scardino (via e-mail)