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March 23, 2012

**EX PARTE**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, 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:

Attached to this letter is a chart identifying tariff filing and customer notification requirements in Verizon ILEC states triggered by recent changes in the federal Lifeline program. These changes include the new \$9.25 flat-rate monthly reimbursement amount, and elimination of the federal Link Up program on non-tribal lands. Commission staff requested that companies seeking an extension of time to implement the new federal reimbursement rate provide this data. We note, however, that the time it takes to implement tariff changes, where required, is not the sole reason ETCs such as Verizon are seeking a short extension. Even where tariff changes are not required, or such changes can technically be implemented on short notice, ETCs such as Verizon must still first work with state commissions to determine the impact of the new federal rules on state Lifeline programs. Once those determinations are made, carriers must then modify their billing systems, which requires IT work to code for new methods for applying discounts and new rates and then test the systems to ensure that we bill Lifeline beneficiaries correctly.

Verizon supports Lifeline reforms and believes that over the long-term, the Commission's recent changes to Lifeline will significantly improve the program. Should you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Maggie McCreedy".

Attachment

cc: Kim Scardino  
Garnet Hanly  
Jonathan Lechter

<b>Verizon State</b>	<b>Tariff Filing Necessary for Lifeline Changes?</b>	<b>Tariff Filing Timeline</b>	<b>Notice Requirement</b>
<b>CA</b>	Yes. File to change Lifeline subsidy amount, Lifeline service rate, and modify language related to federal Link-Up.	1 Day	30 Days (to both PUC and customers)
<b>CT</b>	Yes. File to change Lifeline subsidy amount, Lifeline service rate, and modify language related to federal Link-Up.	21 Days	30 Days
<b>DC</b>	Yes. Rate change not required, but must remove language related to federal Link-Up.	1 Day, although PSC will likely suspend to seek comments	N/A
<b>DE</b>	Yes. File to change Lifeline subsidy amount, Lifeline service rate, and modify language related to federal Link-Up.	Up to 60 Days	Up to 60 Days
<b>FL</b>	No. Must change product guides.	N/A	N/A
<b>MA</b>	Yes. File to change Lifeline subsidy amount and modify language related to federal Link-Up.	30 Days	30 Days
<b>MD</b>	Yes. Rate change not required, but must remove language related to federal Link-Up and change language regarding the eligibility/certification process.	30 Days	N/A
<b>NJ</b>	Yes. File to change Lifeline subsidy amount, Lifeline service rate, and modify language related to federal Link-Up.	30 Days	30 Days
<b>NY</b>	Yes. File to change Lifeline subsidy amount, Lifeline service rate, and remove language related to federal Link-Up and change language regarding the eligibility/certification process.	30 Days for general tariff provisions; rate changes require Board approval	Notice requirements for rate change based on Board schedule reviewing rate change
<b>PA</b>	Yes. File to change Lifeline subsidy amount, Lifeline service rate, and modify language related to federal Link-Up.	30 Days	30 Days
<b>RI</b>	Yes. File to change Lifeline subsidy amount and modify language related to federal Link-Up.	30 Days	30 Days
<b>TX</b>	Yes. File to change Lifeline subsidy amount, Lifeline service rate, and modify language related to federal Link-Up.	1 Day	30 Days
<b>VA</b>	Yes. File to change Lifeline subsidy amount, Lifeline service rate, and modify language related to federal Link-Up.	3 Days for any changes that result in a price decrease; 7 Days for any increases	30 Days