

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23
)	

**REPLY TO COMMENTS ON PETITION FOR RECONSIDERATION
OF
SPRINT NEXTEL CORPORATION**

Sprint Nextel Corporation (“Sprint”), on behalf of its affiliate Virgin Mobile USA, L.P., which offers Lifeline service under the brand name Assurance Wireless Brought To You By Virgin Mobile (“Assurance Wireless”), submits its reply to comments on Sprint’s petition for reconsideration of the *Lifeline Reform Order*.¹ Sprint had requested reconsideration of two aspects of this order: the rules requiring carriers to contact their Lifeline customers who indicate they are residing at a temporary address every 90 days, and to de-enroll those customers who do not respond to the 90-day address verification requests; and the rule which requires that carriers provide a 30-day notification period to subscribers who voluntarily request de-enrollment from the Lifeline

¹ *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Lifeline and Link Up*, WC Docket No. 03-109; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 12-23; *Report and Order and Further Notice of Proposed Rulemaking*, FCC 12-11, released Feb. 6, 2012 (“*Lifeline Reform Order*”).

program or who self-report their ineligibility. Several parties support Sprint's temporary address petition, and no party commented on Sprint's petition relating to voluntary de-enrollments. Accordingly, Sprint's petition for reconsideration should be granted in full.

Four parties – Sprint, GCI, TracFone, and US Telecom – filed petitions for reconsideration of the temporary address rules. All of the parties who commented on these petitions agree that the temporary address rules are unnecessary (redundant given other safeguards such as the initial verification and annual re-verification processes and the rule requiring customers to inform the ETC of a change of address) and burdensome to both Lifeline subscribers and service providers.² It is likely that a significant percentage of Lifeline customers at a temporary address (a term which has yet to be defined) will not respond to the ETC's 90-day address verification requests, and under the rules, will lose a benefit to which they are otherwise entitled to receive and of which they may be in desperate need. Moreover, as Sprint pointed out,³ the temporary address rules were adopted without adequate notice, and it appears that the Office of Management and Budget may also have had some concerns about whether these rules met Paperwork Reduction Act standards.⁴ No commenting party identified any unique benefits associated with the temporary address rules.

It is clear that any putative benefits associated with the temporary address rules are far outweighed by the costs to both Lifeline subscribers and service providers.

² See, e.g., CTIA, p. 2; NTCA, p. 5; Joint Comments of United States Cellular Corp., C Spire Wireless, Smith Bagley, Inc., Budget PrePay, Inc., PR Wireless, Inc., N.E. Colorado Cellular Inc., and Carolina West Wireless, p. 3.

³ Sprint Petition, p. 4.

⁴ See Notice of Office of Management and Budget Action dated April 13, 2012, ICR Reference Number 201203-3060-002 (noting under "Terms of Clearance" that the temporary address confirmation and recertification rules had been removed from the FCC's information collection request).

Accordingly, the Commission should rescind its temporary address policy and delete Sections 54.410(g), 54.410(d)(2)(iii) and 54.410(d)(3)(iv) from the Rules.

Respectfully submitted,

SPRINT NEXTEL CORPORATION

/s/ Charles W. McKee

Charles W. McKee
Vice President, Government Affairs
Federal and State Regulatory

Norina T. Moy
Director, Government Affairs

900 Seventh St. NW, Suite 700
Washington, DC 20001
(703) 433-4503

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing “Reply to Comments on Petitions for Reconsideration” of Sprint Nextel Corporation was filed electronically or via US Mail on this 15th day of May, 2012 to the parties listed below.

/s/ Norina T. Moy

Norina T. Moy

Charles Tyler
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
Charles.Tyler@fcc.gov

Jonathan Lechter
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
Jonathan.Lechter@fcc.gov

Best Copy and Printing, Inc.
Portals II
445 12th St., SW, Room CY-B402
Washington, DC 20554
fcc@bcpiweb.com