May 24, 2012

Marlene Dortch
Secretary
Federal Communications Commission
445 12th 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 April 25, 2012, USTelecom filed a Petition for Waiver[1] (Petition) of section 54.407(d) and sections 54.410(b)(2) and (c)(2) of the Commission's rules with respect to certain eligible telecommunications carrier (ETC) compliance obligations in particular states identified in Appendix 1 of the Petition. Specifically, beginning June 1, 2012, ETCs are required to obtain a subscriber's certification form, which complies with section 54.410(d), before the ETC may seek reimbursement for providing Lifeline to that new Lifeline subscriber. In those states where a state entity performs the Lifeline eligibility determination for some or all subscribers on behalf of some or all of the ETCs in that state, those ETCs must obtain a copy of the subscriber's certification form from the state before the ETC may seek reimbursement for that new Lifeline customer. The waiver request applies only to those ETCs that are required to enroll customers for whom the state has determined the Lifeline customers' eligibility, but where the state does not provide subscriber certifications to the ETC, and will not by June 1, 2012.

USTelecom respectfully withdraws Ohio and Texas from Appendix 1 of the Petition. Based on an order of the Ohio Public Utilities Commission issued yesterday, May 23rd, and a

[1] *See* USTelecom Petition for Waiver, WC Docket Nos. 12-23, 11-42, 03-109; CC Docket No. 96-45 (filed April 25, 2012).

workshop conducted with staff of the Texas Public Utility Commission Tuesday, May 22nd, USTelecom believes that those states will be in compliance with the Commission's rules by the June 1, 2012 deadline.[2]

Please do not hesitate to contact me with any questions,

Sincerely,

David B. Cohen

cc: Kimberly Scardino
Jonathan Lechter

[2] USTelecom continues to request waiver of the rules for ETCs in California, Colorado, the District of Columbia, Florida, Idaho, Montana, Nebraska, Nevada, Oregon, U.S. Virgin Islands, Utah, Vermont and Washington.