

June 29, 2012

VIA ELECTRONIC FILING

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

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

Dear Ms. Dortch:

On May 30, 2012, I filed with the Commission on behalf of my client, TracFone Wireless, Inc. ("TracFone") a Supplement to Petition for Reconsideration and Emergency Petition to Require Retention of Program-Based Eligibility Documentation. That petition requests that the Commission require Eligible Telecommunications Carriers ("ETCs") who view consumer-provided documentation of program-based eligibility for Lifeline enrollment pursuant to Section 54.410(c)(1)(i)(B) of the Commission's rules to retain copies of such documentation for not less than three years. As explained in that supplement to petition, merely requiring ETCs to retain their own compiled notes of the documentation they have viewed is wholly insufficient to prevent waste, fraud and abuse of Universal Service Fund resources.

The supplement to petition also asked the Commission to postpone the June 1, 2012 full certification effective date until such a document retention requirement has been established. With the passage of the June 1 effective date, that one aspect of the supplement to petition has been rendered moot. However, the important substantive issue raised in the supplement to petition -- whether merely requiring ETCs to retain their own notes of the documentation they have viewed is sufficient to prevent waste, fraud, and abuse -- remains unresolved. For that reason, TracFone respectfully requests that the Commission promptly consider that issue and the relief requested, and that it take such steps as necessary and appropriate to compile a full record on the request, including inviting public comment if the Commission deems public comment necessary and beneficial to its efforts to properly address this issue based on a complete record.

Sincerely,



Mitchell F. Brecher
Counsel for TracFone Wireless, Inc.

Cc: Mr. Trent Harkrader
Ms. Kimberly Scardino
Mr. Jonathan Lechter