



July 31, 2012

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Portals II, Room TW-A325  
Washington, DC 20552

**RE: 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; and Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 12-23**

Dear Ms. Dortch:

This letter is filed pursuant to paragraph 4 of the Waiver Order released by the Wireline Competition Bureau on May 31, 2012,<sup>1</sup> which conditions the grant of relief requested by USTelecom in its Petition filed April 25, 2012 in the above referenced proceedings upon USTelecom providing an update to the Bureau by August 1, 2012, on the states' progress to come into compliance with the Commission's rules. USTelecom hereby provides the requested update.

ETCs require continuation of the waiver in the following states, as these states, to the best of our knowledge, have not yet brought their procedures into compliance with Commission rule 54.410(e) which requires the states to provide a copy of Lifeline subscriber eligibility certification forms to ETCs. It thus continues to be impossible for ETCs to comply with sections 54.410(b)(2) and (c)(2) of the Commission's rules which require ETCs to obtain from the state a signed certification from a subscriber prior to seeking reimbursement for that subscriber.

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<sup>1</sup> See Waiver Order, 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; and Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 12-23 (released May 31, 2012).

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California  
Colorado  
District of Columbia  
Florida  
Idaho  
Nebraska

Oregon  
Tennessee  
U.S. Virgin Islands  
Washington  
Utah  
Vermont

USTelecom and its members look forward to working with the Bureau to most efficiently implement the requirements of the Lifeline Order.

Sincerely yours,



David B. Cohen  
Vice President, Policy  
United States Telecom Association

cc: Kimberly Scardino  
Jonathan Lechter