

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 31, 2012

VIA ECFS

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

Re: California Public Utilities Commission's Notice of Ex Parte Communications, *In the Matter of Lifeline and Link Up Reform and Modernization; Lifeline and Link Up; Federal-State Joint Board on Universal Service; Advancing Broadband Availability Through Digital Literacy Training (Lifeline Reform Order)*; WC Docket Nos. 03-109, 12-23 and 11-42; CC Docket No. 96-45

Ms. Dortch:

On August 29, 2012, representatives of California Public Utilities Commission (CPUC) and AT&T spoke by phone for about 45 minutes with Kimberly Scardino and Jonathan Lechter of the Federal Communication Commission's (FCC) Wireline Competition Bureau. The purpose of the call was to discuss the certification form requirements of the *Lifeline Reform Order*. The CPUC's representatives on the call were Jonathan Lakritz, Cherrie Conner, Michaela Pangilinan, Benjamin Schein and Sindy Yun. AT&T's representatives on the call were Jeffrey Mondon, Mike Tan, Ramiz Rafeedie, Cathy Carpino and Mary Jo Peed.

The CPUC and AT&T asked the FCC staff to clarify the requirements of Section 54.407 and 54.410 relating to certification forms. These sections require the CPUC's third-party LifeLine administrator to provide a copy of the certification and re-certification forms to Eligible Telecommunications Carriers (ETC) and for ETCs to have a copy of these forms in order to receive universal service support reimbursement. The CPUC described California's current certification process and explained to the FCC staff that it plans to amend that process by December of this year in order to make the certification forms available to ETCs in compliance with the FCC's rules. The CPUC, in its Petition for Waiver filed with the FCC on April 26, 2012, requested a permanent waiver from the obligation to provide certification forms to ETCs. The FCC denied the CPUC's request, but granted additional time, until December 1, 2012, to comply with the requirements.

Ms. Marlene H. Dortch, Secretary

August 31, 2012

Page 2

AT&T also shared with the FCC that it is not opposed to the FCC eliminating the certification form requirements in states where the eligibility determinations are made by the state's lifeline administrator. The CPUC and AT&T understand that the certification form requirements are currently being reconsidered by the FCC.

If you have any questions regarding this notice, please contact the undersigned at (415) 703-1999 or sjy@cpuc.ca.gov.

Respectfully submitted,

/s/ Sindy J. Yun

Sindy J. Yun
Staff Counsel

cc: Jonathan Lechter – FCC (Jonathan.Lechter@fcc.gov)
 Kimberly Scardino – FCC – (Kimberly.Scardino@fcc.gov)