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September 27, 2012

VIA ECFS

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

Re: ABC Telcom, Inc. Compliance Plan; Notice of Ex Parte Meeting; WC
Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On Tuesday, September 25, 2012, Frank Mumfrey of ABC Telcom, Inc. dba homefone ("ABC Telcom") and John Heitmann and Joshua Guyan of Kelley Drye & Warren, LLP met with Kimberly Scardino, Divya Shenoy and Michelle Schaefer of the Wireline Competition Bureau ("Bureau") to discuss ABC Telcom's Compliance Plan filed on June 28, 2012 and revised and re-filed on September 11, 2012 in the above referenced dockets.

At the meeting, ABC Telcom provided the Bureau staff with the enclosed presentation introducing the company and its management, the company's Lifeline product offerings and its approach to compliance with the requirements of the *Lifeline Reform Order*.¹ ABC Telcom will be submitting a revised Compliance Plan shortly.

¹ See *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*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012).

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This letter and presentation is being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to ABC Telcom, Inc.

cc: Kimberly Scardino
Divya Shenoy
Michelle Schaefer

ABC Telcom, Inc.
FCC Compliance Plan Meeting



September 25, 2012

Agenda

- Introduction of Company
- Company Lifeline Product Offerings
- Marketing/ Advertising Compliance
- End User Enrollment
- Annual Certification
- Procedures Addressing Waste, Fraud and Abuse
- Questions

ABC Telcom, Inc. dba Homefone

- Homefone was founded in 2000 and began providing landline Lifeline service through resale of AT&T in 2008; in 2009, Homefone was designated as a landline ETC in Louisiana
- In 2011, received wireless ETC designation in Louisiana and started offering wireless Lifeline service
- Currently provides landline/ wireless service to over 10,000 Lifeline subscribers
- Current Retail Offerings
 - www.abctelcom.com

Homefone Lifeline Product Offerings

Plan Description	Monthly Minutes
Price to Lifeline Subscriber	FREE
Number of Free Minutes	250
Rollover	N
Text Messaging	1:1

All plans include. . .

- Call Waiting
- Caller ID
- Voice Mail

Homefone Lifeline Product Offerings

- Public Safety and 911/ E911 Access:
 - Homefone will ensure that all handsets used in connection with its Lifeline service are E911-compliant
 - Homefone will provide its Lifeline customers with access to 911 and E911 services:
 - Through its underlying carrier Sprint
 - At the time of Lifeline service initiation
 - Regardless of activation status and minute availability

Marketing & Advertising Compliance

- In compliance with the marketing and disclosure requirements, all of Homefone's marketing materials will
 - Disclose the name of the ETC
 - Explain in clear, easily understood language the following:
 - The service is a Lifeline service
 - Lifeline is a government assistance program
 - Only eligible consumers may enroll in the program
 - What documentation is necessary for enrollment
 - The program is limited to one benefit per household, consisting of either wireline or wireless service
 - Lifeline service is non-transferable
- Homefone's application form will state that Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program

Marketing & Advertising Compliance

- Direct Sales – Electronic: Typically a face-to-face enrollment transaction occurring in retail store or at an event; all documentation can be witnessed in real-time and end user walks away with phone
- Direct Sales – Paper: Face-to-face enrollment in which enroller does not have access to real-time electronic validation; as such, phone must be shipped to end user after the Quality Assurance department performs validation

End User Enrollment

- Company's Enrollment Process requires confirmation of the following items:
 1. Confirms applicant's identity (see government issued picture ID)
 2. Confirm program or income eligibility (see proof of participation or annual household income)
 3. Confirm valid residential address and whether the address is permanent/temporary or multi-household (validates address via Melissa data)
 4. Confirms address is in ETC service area
 5. Confirms applicant is not currently receiving a subsidy from another carrier
 - Applicant certifies under penalty of perjury
 - Specifically mentions other providers in certification
 - Company performs duplicate check into an internal and pooled external database
 6. Confirm applicant receives handset and personally activates the phone (by placing a call) prior to seeking reimbursement from Universal Service Fund

Annual Recertification

- Homefone will recertify the eligibility of all of its Lifeline customers as of June 1, 2012, which will be concluded by the end of the year, and the results sent to USAC by January 31, 2013
- Homefone will continue to re-certify each Lifeline end user annually
- All customers who fail to respond to recertification attempts within 30 days will be given a written notice that they have 30 days to confirm their eligibility or be de-enrolled from the Lifeline program

Procedures Addressing Waste, Fraud, and Abuse

- Homefone strives for compliance in all policies & procedures surrounding its Lifeline program
 - Marketing/ advertising
 - End user initial enrollment & annual certification
 - Training of employees
 - Customer non-usage & de-enrollment
- Subscriber Usage
 - 60 day non-usage policy
- Duplicate Detection:
 - Internal database
 - CGM IDD database
 - National database (when operational)

QUESTIONS?

Thank You