

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
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
)	
Advancing Broadband Availability Through Digital Literacy Training)	WC Docket No. 12-23

COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation (“Sprint”), pursuant to the Public Notice released on October 23, 2012 (DA 12-1699), hereby respectfully submits its comments on GCI’s Petition for Clarification of the Annual Recertification Rule (filed October 1, 2012) in the above-captioned proceedings. In its petition, GCI urges that Section 54.410(f) of the Commission’s rules be interpreted as allowing Lifeline service providers to recertify each of their Lifeline customers once per calendar year, rather than within 12 months of a subscriber’s most recent certification or recertification. While Sprint would not object to allowing some flexibility in timing of the recertification effort, the Commission should accept as a safe harbor standard any recertification performed within 12 months from either the Lifeline subscriber’s anniversary date, or the date of his or her last eligibility certification.

Allowing recertification based on a safe harbor anniversary date offers several advantages over a Commission-prescribed due date:

- Minimizes customer confusion. It is easier for the subscriber to understand and accommodate requests for recertification that occur at regular, logical intervals, rather than at a Commission-prescribed date certain. As evidenced by multiple requests for waiver, the annual certifications scheduled to be completed by December 31, 2012 (of the Lifeline customer base as of June 1, 2012) resulted in a situation in which some subscribers were subject to recertification twice in one calendar year. Allowing recertifications based on anniversary dates would avoid this situation (particularly for new subscribers, who would have had to provide proof of eligibility in order to establish Lifeline service).
- Evens out the work load and the impact of de-enrollments over the entire year. By linking recertification to the subscriber's anniversary date, ETCs can staff for constant effort over the entire year, rather than ramping up heavily to meet a single prescribed date for the entire customer base, and subsequently downsizing as the project is completed for the year. Similarly, USAC staff would face a steady flow of recertification activities over the course of the year, rather than intense activity in a condensed time period.
- Promotes operational efficiencies when combined with other activities associated with Lifeline anniversary dates. Some Lifeline service providers may perform other account activities based upon the customer's anniversary date (*e.g.*, re-evaluation of credit worthiness as reflected by payment record, or eligibility for handset upgrades) and including eligibility recertification would be a logical addition to regularly scheduled account reviews.

Further, allowing recertification based on a safe harbor anniversary date does not compromise efforts to reduce waste, fraud and abuse in the Lifeline program. All Lifeline subscribers would continue to be subject to eligibility recertification, and would be de-enrolled if they fail to provide the required information.

Sprint recognizes that not all Lifeline service providers may be willing or able to track their customers' anniversary dates (at least for recertification purposes) without significant effort, and therefore does not object to allowing such ETCs reasonable flexibility in devising an alternative recertification program that meets the intent of Section 54.410(f). However, for ease of administration, Sprint recommends that the

Commission establish a safe harbor standard for recertification based on the Lifeline customer's anniversary date.

Respectfully submitted,

SPRINT NEXTEL CORPORATION

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