

**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
)	
Verizon Emergency Petition for Waiver of 2012 Lifeline Eligibility Recertification Deadlines due to Hurricane Sandy)	

COMMENTS OF SPRINT NEXTEL CORPORATION

Sprint Nextel Corporation (“Sprint”), on behalf of its Assurance Wireless affiliate, respectfully submits its comments on Verizon’s “Emergency Petition for Waiver of 2012 Lifeline Eligibility Recertification Deadlines due to Hurricane Sandy” (“Verizon Petition”), filed on November 20, 2012 in the above-referenced proceedings. As discussed briefly below, Sprint urges the Commission to grant Verizon’s petition and to extend the same relief to Assurance Wireless.

In its Petition, Verizon has explained that Hurricane Sandy disrupted mail and telephone service to tens of thousands of customers in New York and New Jersey, negatively impacting its efforts to re-certify its Lifeline customers in those states pursuant to Section 54.410(f) and 54.416(b) of the Commission’s Rules. It has thus requested a 3-

month extension, until March 31, 2013, to recertify its Lifeline customers in New York and New Jersey, and a corresponding 30-day extension in the deadline to report its recertification results to the Commission and USAC, until April 30, 2013. Verizon also has requested a waiver of Section 54.405(e)(4) so that during this extended time period, it would not be required to de-enroll Lifeline customers who have not yet recertified their on-going eligibility.

As was true for Verizon, the devastation wrought by Hurricane Sandy, particularly in New York and New Jersey, also has negatively impacted Assurance Wireless' customers and its recertification efforts. Assurance Wireless' review of recertifications received from customers in the parts of New York and New Jersey most directly impacted by the storm showed response rates for the period immediately following Sandy (October 30-November 17) that were measurably lower than the response rates in other states for the same time period. Because New York and New Jersey are among the largest Lifeline markets in the country, even a moderate reduction in response rates could equate to thousands of Lifeline subscribers. Assurance Wireless has no way of determining exactly how many or whose forms and completed responses were lost or destroyed,¹ and it would be unfair and unfortunate to de-enroll Lifeline customers who may have submitted the requisite recertification, or who were in the process of doing so, but whose forms were not processed due to the hurricane.

Assurance Wireless is also concerned that some reminder messages sent to its Lifeline customers were not timely received (*e.g.*, customers who did not receive reminder text messages because they were unable to recharge their phones due to power

¹ Hurricane Sandy damaged or destroyed not only Lifeline subscribers' homes and U.S.P.S. postal facilities, but also the New Jersey offices of the company which processes recertification forms on behalf of Assurance Wireless.

outages), or were ignored because the customers were coping with more dire concerns. Therefore, Assurance Wireless plans to send additional reminders and, depending upon whether/how much additional time may be granted, to re-send recertification forms to New York and New Jersey Lifeline customers from whom we have not yet received a response. A 3-month extension of time to engage in such recertification efforts, as has been requested in the instant waiver proceeding, will help to ensure that customers affected by Hurricane Sandy – especially those who have been displaced from their homes -- have a reasonable opportunity to submit the requisite recertification information.

Respectfully submitted,

SPRINT NEXTEL CORPORATION

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