

555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004-1304
Tel: +1.202.637.2200 Fax: +1.202.637.2201
www.lw.com

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February 8, 2013

VIA ECFS

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

Re: Notice of Ex Parte Presentation, *Lifeline and Link Up Reform and Modernization*,
WC Docket No. 11-42; *Lifeline and Link Up*, WC Docket No. 03-109

Dear Ms. Dortch:

On February 6, 2013, Patrick Shipley, Julie Buechler, and Susan Chandler of Cricket Communications, Inc. (“Cricket”), together with the undersigned, met with Kimberly Scardino, Garnet Hanly, Michelle Schaefer, and Jonathan Lechter (by telephone) of the Wireline Competition Bureau to discuss Cricket’s experience as a participant in the Commission’s Lifeline program.

We provided background information on Cricket’s Lifeline offerings, which are now available in 28 states. We discussed how Lifeline discounts have benefitted low-income consumers, including by increasing their ability to remain connected to the public switched telephone network (“PSTN”)—as reflected in reduced disconnection levels compared to non-Lifeline subscribers—and by enabling them to obtain broadband access to the Internet through Cricket’s bundled service offerings.

We also discussed Cricket’s experience with the annual Lifeline recertification process. Cricket employed a variety of measures to reach Lifeline subscribers (including mailed notifications, text messages, in-store communications, and telephone calls) and to recertify their eligibility (including an interactive voice response system and a web-based interface). Through such efforts, Cricket was able to recertify the eligibility of a substantial majority of Lifeline subscribers, but many customers did not respond and accordingly were disenrolled from the Lifeline program. Based on Cricket’s experience, we advised that requiring annual recertification of all subscribers as of a fixed date (as opposed to a rolling recertification process) is more workable and efficient.

We further discussed the Commission's efforts to combat waste, fraud, and abuse, including the measures that appear to have worked well and the areas where more stringent enforcement and additional rule changes may be required. In particular, we noted that many small prepaid wireless providers that offer very limited allotments of included minutes distribute phones from tents and vehicles and, in too many instances, appear to be violating the Commission's verification requirements. We suggested that, while more aggressive enforcement action would help address such abuses, the Commission also should consider requiring all Lifeline providers to offer a minimum allotment of minutes for voice usage. We explained that Cricket's customers on average use approximately 1,500 minutes per month for voice calling, and, more broadly, industry groups have reported that the average mobile phone customer consumes more than 600 minutes per month for voice usage.¹

Finally, we urged the Commission to move forward expeditiously with its deployment of the planned "duplicates" database, and to ensure that the contractor it selects will work closely with carriers to ensure efficient interfaces and to minimize compliance burdens.

Please contact the undersigned with any questions regarding this notice.

Sincerely,

/s/ Matthew A. Brill

Matthew A. Brill
Counsel to Cricket Communications, Inc.

cc: Kimberly Scardino
Garnet Hanly
Michelle Schaefer
Jonathan Lechter

¹ *CTIA Semi-Annual Wireless Industry Survey*, at 5,7 (showing 2.321 trillion minutes of voice usage annually and 321.7 million total connections, resulting in a monthly average of 601 minutes), available at http://files.ctia.org/pdf/CTIA_Survey_MY_2012_Graphics_final.pdf.