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March 7, 2013

VIA ECFS

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

Re: Notice of Oral Ex Parte Presentation - WC Docket Nos. 11-42, 09-197

Dear Ms. Dortch:

On Tuesday, March 5, 2013, Brian Lisle and William Curry of Telrite Corporation/Life Wireless, along with Kevin Joseph of The Joseph Group, LLC and the undersigned counsel met with Priscilla Delgado Argeris of Commissioner Rosenworcel's office to introduce Telrite and to discuss its Life Wireless branded Lifeline program.

During the meeting, we commended the Commission for its successful and effective reforms of the Lifeline program and explained the many ways in which Telrite has demonstrated its commitment to be a trusted partner in and good steward of the program. From thousands of broadcast airings of PSAs designed to inform the public of the rules and benefits of the program, to industry-leading compliance practices designed to eliminate waste, fraud and abuse, Telrite has backed its mission statement with actions. Telrite's mission statement is included in the attached presentation, which was distributed at the meeting.

Telrite also encouraged the Commission to move quickly toward completion of the most meaningful reform of all – the National Duplicates Database (“NLAD”). While the Commission's 60-day non-usage rule, annual recertification rules and many of Telrite's self-imposed controls (e.g., it is the only one of the big four wireless ETCs to seed and dip a pooled intercompany database to screen for duplicates) have been tremendously effective, no reform will be more effective than the NLAD. Telrite also reiterated its position in favor of allowing ETCs to retain the proof of eligibility they accept to support enrollment.

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Telrite also rebutted anticompetitive attacks on its business model made previously by a competitor that unconvincingly submits that its model of mailing phones to people it never sees face-to-face is somehow more effective at combatting waste, fraud and abuse than Telrite's model of in-person enrollment supported by photo-identification and live pre-enrollment database dips designed to eliminate fraudulent enrollment attempts. Real-time in-person handset distribution and enrollment can be among the best ways to reduce fraudulent enrollments. That said, Telrite also expressed its belief that the Commission should not pick winners and losers among business models and competitors.

The Commission also should not deny citizens of states for which the Commission designates wireless ETCs the benefits of additional competition. Telrite urged the Commission to grant its pending application for designation as a wireless ETC in ten "federal jurisdiction" states.

Finally, Telrite reiterated its support for the Commission's Lifeline Reform Order decision to reject imposition of a minimum charge for wireless ETC Lifeline services noting that all of the reasons relied on by the Commission in support of its decision remain valid today. Telrite also asserted that recent calls for eligible low-income consumers to have "skin in the game" are at best unsupported attempts to achieve what the NLAD easily will achieve and at worst are thinly veiled attempts to deny eligible low-income consumers the vital benefits of mobility and connectivity made possible by the Lifeline program.

In accordance with the Commission's rules, this letter 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

cc: Priscilla Delgado Argeris
Kimberly Scardino
Alexander Minard
Jonathan Lechter



Talk. Text. Live.

Telrite Corporation

FCC Meetings / March 2013



Telrite

Who we are

- Reggie McFarland, Founder & CEO
 - Over 35 years in executive/ownership roles in telecommunications industry
- Brian Lisle, President of Telrite
- Will Curry, President of Life Wireless (the Lifeline division of Telrite)

Telrite Corporation

Covington, GA

- Facilities-Based, Global Inter-Exchange Carrier
 - Local/LD Residential and Business Markets
- Wireless MVNO Access
 - AT&T Nationwide GSM Coverage

Life Wireless

Covington, GA



Life Wireless

What we do

- 4th largest wireless ETC
- Currently serving over 600,000 Lifeline customers
- ETC designated and operating in 17 jurisdictions
- FCC Compliance Plan approved December 26, 2012

How we got here

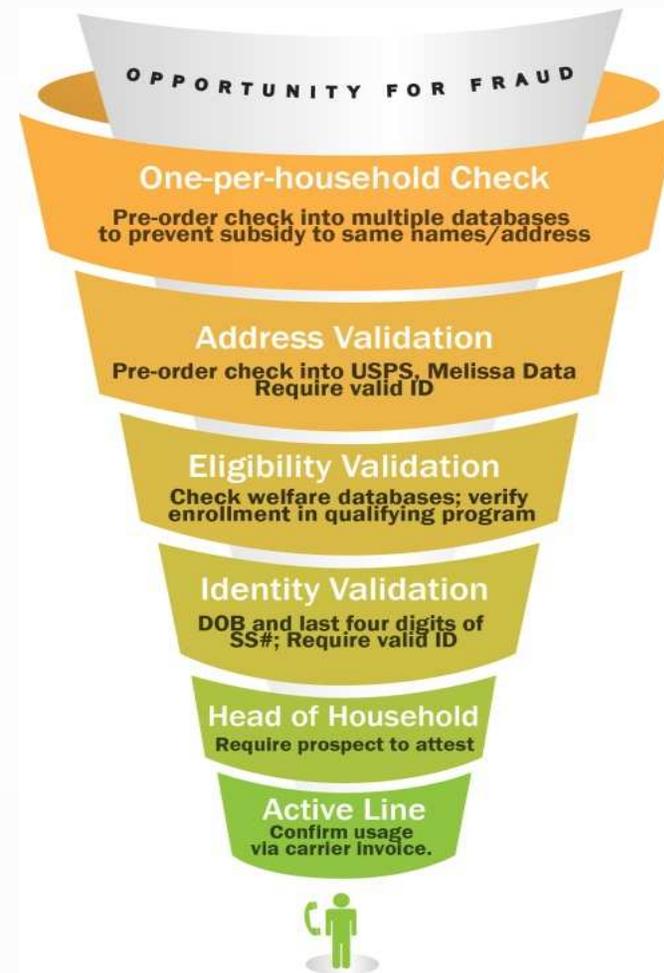
- Life Wireless launched in early 2010
- Our “feet on the street” business model differentiates us from the two market leaders
- Established direct sales network:
 - Local charities, outreach organizations and churches
 - Community centers, libraries, food banks, section 8 housing, etc.
 - Locally owned businesses: primarily retail locations
- Built top-notch compliance, fulfillment & field operations infrastructure



Mission Statement

Telrite's mission is to drive awareness and availability of the Lifeline program to underserved markets across the United States.

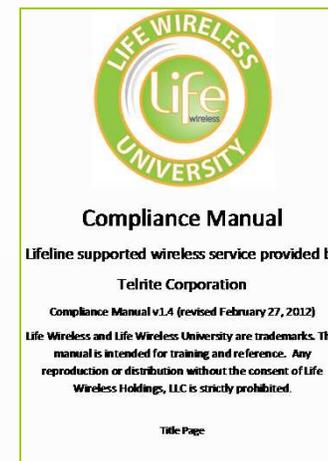
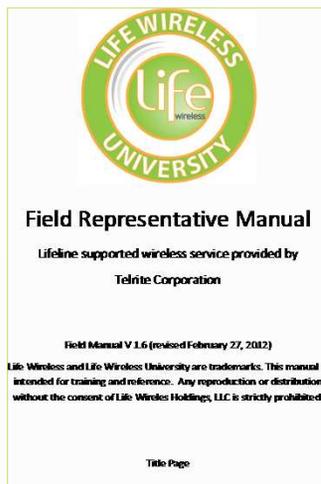
We are committed to being the industry-standard for compliance, and will continue to strive to prevent, detect and eliminate waste, fraud, and abuse.





Mission in Action

- Hundreds of PSAs aired in Life Wireless markets across the country
- Active and professional public relations team
- Industry leading compliance-driven processes and procedures
 - Program management: compliance management, field operations, auditing and support
 - On-boarding process: identification, verification, agreement, training and credentialing of all Life Wireless representatives





Outstanding Issues

Federal ETC designation

- Telrite filed its federal wireless ETC application on April 4, 2012

Real-time in-person handset distribution

- This distribution method, when properly used, is the most effective way of eliminating waste, fraud and abuse

Retention of proof

- We support changing the rule so that retention of proof is required

Minimum charges

- The FCC soundly rejected calls for “skin in the game” and a minimum charge in the Lifeline Reform Order; there is no reason to change course: mobility is a reality and wireless handsets are not a luxury

National duplicates database

- As soon as possible...nothing could do more to bolster the integrity of the Lifeline program