

June 25, 2013

Ex Parte

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

Re: *Telecommunications Carriers Eligible To Receive Universal Service Support, WC Docket No. 09-197; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42*

Dear Ms. Dortch:

On Friday, June 21, 2013, Thomas O’Roark, COO of SafeTel, LLC (“SafeTel”) and I, on behalf of SafeTel, spoke via telephone with Radhika Karmarkar, Deputy Division Chief of the Telecommunications Access Policy Division. We discussed the points raised in the PowerPoint presentation that was distributed at the meeting with Rebekah Goodheart on June 12, 2013, incorporated via reference herein.¹ The delay in approval of SafeTel’s compliance plan, which appears to be unrelated to the substance of SafeTel’s plan, is threatening SafeTel’s existence, because, without a wireless product to provide to its agents, SafeTel’s agents can and are being recruited by other wireless Lifeline providers in Oklahoma, some of whom have already entered into Lifeline-related consent decrees. Delay effectively protects those competitors and punishes SafeTel unjustly. This destroys SafeTel’s key asset, which is its network of “brick-and-mortar” agents in small towns throughout Oklahoma, many of whom have expressed a strong preference for dealing with SafeTel.

In order to stop this ongoing competitive harm, SafeTel needs a reasonable date by which it can begin providing wireless Lifeline service. Without that, agents are likely to continue to be enticed to other providers, investors will not be able to justify continued investment, and SafeTel will not be able to survive. SafeTel begs the Commission to give SafeTel the ability to survive. To assure the Commission that approval of SafeTel’s compliance plan will not significantly increase demand for Lifeline support or expose the Fund to significant waste, fraud, and abuse, SafeTel would commit (and would accept as a condition of compliance plan approval) to serving no more than 5,000 wireless lines until after the National Lifeline Accountability Database is

¹ See Ex Parte Notice, John Nakahata, Counsel, SafeTel, LLC, to Marlene Dortch, Secretary, Federal Communications Commission, Attachment at 3-5, WC Docket Nos. 09-197, 11-42 (filed June 14, 2013).

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fully operational for Oklahoma, which is the only state in which SafeTel is planning on operating at this time.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata".

John T. Nakahata
Counsel to SafeTel, LLC

cc: Radhika Karmarkar
Kim Scardino
Michelle Schaefer