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Ex Parte (via ECFS)

Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42;

Dear Ms. Dortch:

On Thursday, September 19, the following AT&T personnel met with Jonathan Lechter and Anita Patankar-Stoll of the Wireline Competition Bureau: Ernie Bond, Dewey Alexander, III, Anita Senecal, Ann Bornholdt, Ira Nicholas, Bill Lentz, Steve Libera, and the undersigned. Ernie, Dewey, and I met with staff and the other AT&T employees participated via conference call. The purpose of our meeting was to discuss several issues involving the National Lifeline Accountability Database (NLAD).

According to information on USAC's website, the NLAD will be in production by "4Q2013" in five states (Arkansas, Louisiana, Maryland, Oklahoma, and Washington), with the remaining states in production by "1Q2014."¹ That means Lifeline providers in those five states will begin submitting Lifeline subscriber information as early as November and, by the end of the year, will use the NLAD for duplicate identification.² AT&T expressed concerns about delays in obtaining answers to technical and process questions that it had posed to USAC last month. AT&T explained that in order to interface with the NLAD, it will have to undertake significant and time-consuming information technology (IT) programming work. That work cannot be completed until we understand fully all of the NLAD's requirements and, given the late date, we explained that it will be very difficult for AT&T to meet USAC's and the Commission's "4Q2013" timeline for the three states where AT&T provides wireline Lifeline service (Arkansas, Louisiana, and Oklahoma).

¹ See National Lifeline Accountability Database Webinar Training at 11 (dated June 19, 2013), available at <http://www.usac.org/res/flash/li/online-learning/nlad/player.html?e=644963&s=1&k=41DD00111C8EF954F92B8C45CE3F3853>.

² See National Lifeline Accountability Database, Connectivity Workshop Presentation at 11 (dated August 27, 2013), available at http://www.usac.org/res/documents/li/training/2013/AugustNLADWorkshop_PresentationMaster.pdf.

We also shared with staff the sheer volume of activity associated with our wireline Lifeline accounts – over 75,000 transactions/month just for customers adding Lifeline service, de-enrolling from AT&T’s Lifeline service, or disconnecting service altogether. We explained that these numbers do not include other changes to Lifeline customers’ accounts (e.g., change in address). Given these volumes, it is not feasible for AT&T’s wireline affiliates that provide Lifeline service to interact with the NLAD on some manual basis for those three states while the IT work, which is necessary to interact with the NLAD on a mechanized basis, is being completed. AT&T recommended that the Commission and USAC trial the NLAD with just one state in 2013. Doing so will enable Lifeline providers additional time to make the necessary IT modifications and, given the lower volumes associated with just one state, could allow Lifeline providers in that state to interact with the NLAD on a manual or semi-manual basis, if necessary.

AT&T also expressed concerns about the proposed benefit transfer process, in which USAC will notify a Lifeline provider to de-enroll a subscriber because that subscriber has opted to obtain Lifeline service from another provider. AT&T explained that, as proposed, the losing carrier will have little information to share with its customer if/when the customer calls to inquire about why he is no longer receiving Lifeline-discounted service from that carrier. AT&T suggested that when USAC notifies both Lifeline providers about a successful benefit transfer, it also send the affected customer a letter informing the customer that Carrier A will now be the customer’s Lifeline provider and Carrier B has been instructed to de-enroll the customer. With such a letter, affected customers would be equipped with adequate information to follow-up with one or both carriers, as appropriate, in a timely manner.

Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Cathy Carpino
Cathy Carpino

cc: Jonathan Lechter
Anita Patankar-Stoll