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Brian H. Lloyd
Executive Director



Rick Perry
Governor

Public Utility Commission of Texas

VIA ECFS

November 07, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street
Washington, D.C. 20554

Re: Lifeline and Link up Reform and Modernization, WC Docket No. 11-42; Lifeline and Linkup, WC Docket No. 03-109; Federal-State Joint Board on Universal Fund, WC Docket No. 96-45; Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 12-23

Comment of EX PARTE Presentation

Dear Ms. Dortch:

On September 13, 2013 Javier Rosado, TracFone Wireless, Inc. and Mitchell Brecher, counsel for TracFone Wireless Inc. met with Radhika Karmarkar, Deputy Chief, Telecommunications Access Policy Division, and with Jonathon Lechter and Christopher Cook, Attorney-Advisors, Telecommunications Access Policy Division, Wireline Competition Bureau about several issues including Lifeline program-based eligibility databases in various states. As part of that discussion a handout was given to the FCC "State Database Fact Sheet".

I would like to correct information on the "State Database Fact Sheet" as it relates to Texas. On the first slide under programs validated, TANF was excluded from the fact sheet. The second slide gives the impression that 88% of ETC's do not use the state database to verify program or income eligibility. That statement is not true, 100% of ETC's utilize the state database to validate eligibility. While it is true that 11 prepaid ETC's use the portal setup for their business model, **ALL** ETC's are run through our state database for matching eligibility in addition to **ALL** ETC's run through the duplicative process.

Respectfully submitted,

/s/

Jay Stone, Program Administrator

Public Utility Commission of Texas
1701 N. Congress Ave.
Austin, Texas 78711-3326
(512) 936-7000

September 13, 2013

VIA ELECTRONIC FILING

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

Re: WC Docket No. 11-42 - Lifeline and Link Up Reform and Modernization
WC Docket No. 03-109 – Lifeline and Link Up
CC Docket No. 96-45 – Federal-State Joint Board on Universal Service
NOTICE OF EX PARTE PRESENTATION

Dear Ms. Dortch:

On September 13, 2013, Javier Rosado, Senior Vice President, TracFone Wireless, Inc. (“TracFone”) and I met with Radhika Karmarkar, Deputy Chief, Telecommunications Access Policy Division, Wireline Competition Bureau, and with Jonathan Lechter and Christopher Cook, Attorney-Advisors, Telecommunications Access Policy Division, Wireline Competition Bureau.

During the meeting, we discussed several matters regarding the federal Lifeline program supported by the Universal Service Fund (“USF”). Specifically, we briefed the attendees on the status of TracFone’s efforts to obtain access to Lifeline program-based eligibility databases in various states. As part of that discussion, we provided the attendees with a State Database Factsheet which identifies on a state-specific basis the states where access to databases is available, when such access became available, access costs, and the Lifeline-qualifying programs included in each state’s database. We also provided a document which indicates how many Lifeline providers (Eligible Telecommunications Carriers or “ETCs”) use those state databases in the states where access to state databases is available. Copies of these documents are attached to this letter. In addition, we discussed the progress of TracFone’s efforts to obtain access to eligibility in other states.

We also discussed certain aspects of the plans for implementing the National Lifeline Accountability Database (NLAD) by the Universal Service Administrative Company (USAC). One problem we discussed involves the requirement that ETCs provide a telephone number to the database at the time of enrollment. This requirement presents difficulties for TracFone and, presumably, other ETCs. As a mobile virtual network operator, TracFone does not have available an inventory of North American Numbering Plan telephone numbers to assign to customers. Rather, when it activates a customer, it requests that the underlying carrier on whose network the customer is to be served assign a telephone number. This method has worked well and has prevented fraudulent use of assigned numbers. Moreover, assigning a telephone number and loading the number into the NLAD database at the time of enrollment but prior to activation

Ms. Marlene H. Dortch
September 13, 2013
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will do nothing to prevent waste, fraud and abuse of USF resources. We informed the staff that TracFone is working with USAC to attempt to find a workable resolution to this problem such as use of a single "dummy" number at the time of enrollment but that further involvement by the Commission may become necessary to rectify this problem. That dummy number would be replaced with a permanent telephone number once it was assigned. That permanent number would then be loaded into the NLAD.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If there are questions, please communicate directly with undersigned counsel for TracFone.

Sincerely,



Mitchell F. Brecher
Counsel for TracFone Wireless, Inc.

Cc: Ms. Radhika Karmarker
Mr. Jonathan Lechter
Mr. Christopher Cook

Attachments

Attachments

State Database Fact Sheet

#	State	Actively working since 8/2012	Launch Date	Days since initial approach/launch	Costs			Programs Validated
					Development Cost	Login / User ID Cost	Maintenance Fee (Annual)	
1	AR	8/8/2012	8/14/2013	371	\$3,400.00	\$95 per requested user ID	\$1,000.00	Medicaid, SNAP and TANF
2	FL		4/30/10		\$0	\$0	\$0	Medicaid, SNAP and TANF
3	IL	8/8/2012	5/15/2013	280	\$0	\$0	\$1,200	Medicaid, SNAP and TANF
4	MD		3/2/10		\$0	\$0	\$0	Medicaid, SNAP, TANF, Electrical Univ Svc, MD Energy Assis (EAP), Public Assis to Adults (PAA)
5	MI	7/1/2012	11/6/2012	128	\$20,000.00	\$0	1st yr \$4,000 + 5% annual increase	SNAP, TANF / Family Independence Program (FIP)
6	NY	8/8/2012	1/16/2013	161	\$0	\$0	\$0	Medicaid, SNAP, TANF, LIHEAP, SSI, Safety Net Assistance
7	OR	8/1/2012	1/21/2013	173	\$0	\$0	\$0	Medicaid, SNAP, TANF, SSI
8	SC	8/8/2012	11/6/2012	90	\$0	\$0	\$0	SNAP, TANF / Family Independence Program (FIP)
9	TX		8/14/2012		\$0	\$0	\$0	Medicaid, CHIP (Children's Medicaid), SNAP
10	WA		11/23/10		\$0	\$0	\$0	Medicaid, SNAP, TANF, SSI, State Fam Assis (SFA), Refugee Assistance, DSHS Chore Service, Disability Lifeline, Community Options Prog Entry System (COPEs)
11	WI		3/17/2011		\$0	\$500 per requested user ID	\$0	Medicaid, SNAP, TANF, SSI, Badger Care, LIHEAP, WisconsinWorks (W2)
12	TN	8/8/2012	10/15/2013	433				Medicaid, SNAP, TANF, SSI, LIHEAP
13	NC	8/8/2012			Estimated Cost \$57,655			Medicaid, SNAP, TANF, LIHEAP and Crisis Intervention Prog (CIP)

Notes:
Working with add'l 18 states AL, AZ, CT, DC, DE, GA, KY, LA, MA, ME, MS, NH, NV, OH, PA, TN, UT, VA - Avg time 380 days

Active DB Count	State	Wireless	Home	Total ETC's	ETC's utilizing database	% of ETC's NOT utilizing State databases to verify eligibility
1	Michigan	14	38	52	1	98%
2	Illinois	9	48	57	12	79%
3	New York	8	39	47	2	96%
4	South Carolina	13	33	46	1	98%
5	Oregon	7	32	39	7	82%
6	Florida	4	21	25	3	88%
7	Maryland*	20	4	24	1	96%
8	Wisconsin	22	74	96	35	64%
9	Washington	11	21	32	6	81%
10	Texas	21	68	89	11	88%
11	Arkansas	17	27	44	1	98%
		146	405	551	80	-85%

*State has not responded

FI - (TracFone, Assurance and I-Wireless)