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February 11, 2014

VIA ECFS

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

Re: Notice of *Ex Parte* Presentation; WC Docket Nos. 11-42, 03-109

Dear Ms. Dortch:

On Friday, February 7, 2014, Alex Rodriguez of CGM, LLC on behalf of Global Connection Inc. of America; i-wireless LLC; Telrite Corporation; Boomerang Wireless, LLC; and Blue Jay Wireless, LLC, each members of the Lifeline Connects Coalition (“Coalition”), participated in a teleconference with Anita Patankar-Stoll of the Wireline Competition Bureau and Jean Yeung, James Lee and Stephan Mitchev of the Universal Service Administrative Company (“USAC”) to discuss several outstanding questions related to the implementation of the National Lifeline Accountability Database (“NLAD”).

Missing Functionality from the “Verify” Process

It is important that the NLAD “verify” process incorporate the same feedback from NLAD as is provided in the “enroll” process. The NLAD will allow ETCs to verify that a potential applicant is not a duplicate and that the information collected will be processed by the NLAD using the “verify” process. Once that process is cleared, the ETC will receive additional information from the applicant, provide further disclosures, obtain certifications, assign a telephone number and activate a handset (“burn” a SIM card for GSM-based providers) to be distributed to the applicant once the “enroll” process is completed.

1. Benefit Porting Eligibility (60-Days) During “Verify” Process. On the call, Mr. Rodriguez discussed the need for the NLAD “verify” process to indicate if a potential applicant (identified as Track 1 duplicate) is eligible for a benefit port (outside the 60-day enrollment “freeze” window). If an applicant is identified as a Track 1 duplicate (i.e., that person

Marlene H. Dortch, Secretary
February 11, 2014
Page Two

already has a Lifeline benefit), then the applicant cannot enroll in Lifeline service with the ETC unless the applicant states that he or she wants to port his or her benefit from the current ETC to a new ETC. An ETC must know whether the applicant is eligible to port his or her benefit or is subject to the 60-day enrollment freeze before they complete all of the enrollment steps, including assigning a telephone number and activating a handset, for example by burning a SIM card.¹ At this time, NLAD only identifies if a subscriber is eligible for a benefit port as part of the “enroll” API process, after a telephone number has been assigned.² If the “enroll” process indicates that the applicant cannot port her benefit because of the freeze, the ETC has to cancel the enrollment and re-assign the telephone number. A SIM card cannot be re-burned, so it is wasted. Mr. Rodriguez proposed that the NLAD either report the benefit port status in the “verify” process or allow use of a temporary number for enrollment submissions to NLAD.³

In the interim, ETCs will most likely notify any applicants that show as Track 1 duplicates at the “verify” process to discontinue service with their current provider and re-apply because the difficulty and risks associated with attempting to enroll those applicants is too great. This process is not as efficient as it relies on the de-enrollment process of the ETC that the applicant chooses to leave and the timing of the de-enrollment with NLAD.

The parties discussed including the benefit port status as part of the “verify” process in a future release. Mr. Rodriguez stressed that this is the ETCs’ highest priority for the NLAD and the importance of having this included as soon as possible, so that the new 60-day benefit port freeze feature can be fully implemented.

2. Third Party Identity Verification (“TPIV”) Failure Resolution ID During “Verify” Process. In the event that an applicant fails the TPIV check, ETCs have the opportunity to automatically submit a resolution request to the NLAD, to override the failure. In order to submit this request, a Resolution ID is required from NLAD. NLAD provides the Resolution ID in the “enroll” process, but is not currently providing one in the “verify” process. Mr. Rodriguez explained that ETCs would prefer to receive the Resolution ID at the “verify” process so that they can receive a response regarding the exception to the TPIV prior to

¹ The customer will later “activate” the service by placing a phone call.

² NLAD requires that ETCs provide an assigned telephone number to enroll an applicant.

³ See Telrite Corporation; i-wireless LLC; Boomerang Wireless, LLC; Global Connection Inc. of America and Blue Jay Wireless, LLC Written Ex Parte Presentation; WC Docket No. 11-42 (Dec. 23, 2014) (supporting TracFone position and stating that the Commission should either not require ETCs to provide an assigned telephone number at the time an ETC submits an applicant to the NLAD or permit the submission of a “dummy” number).

Marlene H. Dortch, Secretary
February 11, 2014
Page Three

proceeding to an enroll process. However, if the process remains unchanged, ETCs will likely still submit a resolution request as part of the enroll process.

We also discussed the anticipated interval for responding to a resolution request based on a TPIV check failure from Lexis Nexis. USAC indicated that they expect response intervals to be within 24 to 48 hours of a resolution request.

In short, the NLAD should incorporate the same feedback in the “verify” process as will be provided in the “enroll” process.

New SACs in Post-NLAD World

USAC advised that they will add new Study Area Codes (“SACs”) to NLAD once the appropriate state designation and SAC request form has been reviewed by USAC. This process will no longer depend on an FCC Form 497 filing. The parties discussed historical time intervals for SAC requests and issuance. USAC indicated that it expects that future SAC requests will be processed within two weeks of receipt of a correctly completed SAC request. Further, the new SAC will be loaded to NLAD within this same window such that an ETC should be able to provide service in a new state two weeks after submitting a correctly completed SAC Request Form.

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,



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cc: Anita Patankar-Stoll, WCB
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