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VIA ECFS

EX PARTE

February 14, 2014

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*

Dear Ms. Dortch:

On February 12, 2014, Tim Loken, David Murdock, Jody Williams, and the undersigned, of Windstream Corporation (“Windstream”), met with Anita Patankar-Stoll of the Wireline Competition Bureau to discuss Windstream’s experiences with the National Lifeline Accountability Database (“NLAD”) migration and to recommend some actions the Bureau could take to ease the migration process for all parties involved.

Windstream stated that it has done the initial input in the NLAD for nearly all of its Lifeline customers but that more than 25 percent—approximately 15,000—have not been accepted. The vast majority of the rejections cite problems with the addresses, but the error messages frequently do not guide Windstream to the actual reason for the rejection. In many cases, the addresses come up as valid when input into the United States Postal Service database at usps.com, but are failing the address matching system in the NLAD. Windstream is working to resolve address issues through re-review of customer applications, individual keying of variations of the addresses on usps.com and/or contacting each customer individually to clarify address information. If Windstream is not able to resolve the issue on its own, it may pursue a resolution process with USAC where the address appears valid on usps.com, but USAC has informed Windstream that records resolved in this manner will not be included in the initial NLAD duplicate check.

Windstream has resolved most of the address issues in Group 1 states, but has not had and will not have as much time to resolve issues for the states in Groups 2 through 6 under the current migration schedule. Moreover, Windstream’s personnel working on the migration are also those tasked with addressing USAC audits and PQAs, which have seven-day turnarounds and continue to be issued during the migration process.

Thus, Windstream requested that the Bureau delay the deadline for migration of Group 2 until one month after Group 1 is due, so companies have time to begin address reconciliation for Groups 2 through 6. Windstream also asked the Bureau to work with USAC to develop more specific and accurate error messages for the NLAD, and to delay Lifeline audits and PQAs until after the migration process is complete. Finally, Windstream asked the FCC to direct USAC to conduct its address resolution process before doing the initial duplicate check in the NLAD.

Please feel free contact me if you have any questions.

Sincerely yours,

/s/ Malena F. Barzilai

Malena F. Barzilai

cc: Anita Patankar-Stoll