required to return any Lifeline benefits received prior to the determination that the account is ineligible. Moreover, the Lifeline ETC would not be subject to any potential fines or penalties for having enrolled the subscriber or having requested reimbursement for the subscriber prior to the USAC or FCC determination. As with the safe harbor for wholesale providers in the USF contributions process, compliance with the safe harbor procedures would be sufficient to discharge the Lifeline ETC's duties to check for duplicate enrollments.

CONCLUSION

For the reasons explained above, Assist Wireless requests that the Commission vacate the December 2013 IDV findings regarding intra-company duplicates. In so doing, Assist Wireless requests that the Commission further clarify that under existing policy, only accounts with exact matching information in all required fields may be deemed to be duplicates based on available subscriber information. Finally, Assist Wireless requests that the Commission establish a safe harbor for Lifeline providers to follow in the future when checking for duplicate enrollments.

These actions will protect and promote the efficient administration of the Lifeline program. Commission action to clarify its duplicates policy, correct the erroneous USAC findings and to establish a safe harbor for duplicate detection can restore balance to the program. By taking the actions above, the Commission will increase compliance with the Lifeline program's requirements, will promote responsible Lifeline practices and will further the policy goals of the program.

Respectfully submitted,

ASSIST WIRELESS, LLC

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CONFIDENTIAL EXHIBIT 1
(REDACTED)