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September 2, 2014

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

**Re: *Ex Parte* Notification
Lifeline Reform: Independent Audit Requirement
WCB Docket No. 11-42**

Dear Ms. Dortch:

On behalf of Smith Bagley, Inc. (“SBI”), David A. LaFuria and Robert S. Koppel met on August 27, 2014 with Jonathan Lechter, Anita Patanker-Stoll, and Michelle Schaefer of the Wireline Competition Bureau. At the meeting, we discussed SBI’s Petition for Partial Waiver (“Petition”) of the FCC’s biennial audit rules. SBI is the only Lifeline provider subject to the biennial audit requirement that operates in exactly three states, and as a result, would be the only multi-state operator to be required to have 100% of its operations audited. Because of the disproportionately large burden this represents for SBI as a small business, the Petition requested a limited waiver such that the independent auditor would be instructed to select one of SBI’s two largest states in terms of Lifeline and Link Up reimbursements.

Please contact the undersigned if you have any questions.

Respectfully submitted,



David A. LaFuria
Robert S. Koppel
Steven M. Chernoff

Counsel for Smith Bagley, Inc.

cc (via e-mail):

Jonathan Lechter
Anita Patanker-Stoll
Michelle Schaefer