



May 21, 2015

***Ex Parte Notice***

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

**RE: WC Docket No. 11-42, Federal-State Joint Board on Universal Service Lifeline and Link Up Reform and Modernization**

Dear Ms. Dortch:

On Tuesday, May 19, 2015, the undersigned and David Hoover on behalf of NTCA–The Rural Broadband Association (“NTCA”) met with Jonathan Lechter, Acting Deputy Division Chief of the Wireline Competition Bureau’s Telecommunications Policy Access Division, Radhika Karmarkar, Deputy Division Chief of the Wireline Competition Bureau’s Telecommunications Policy Access Division, and Christopher Cook of the Wireline Competition Bureau. The parties discussed potential reforms of the Universal Service Fund (“USF”) Lifeline program.

NTCA expressed its support for proposals that would remove Eligible Telecommunications Carriers (“ETCs”) from the administration of the program, in particular the process of confirming consumers’ eligibility for the Lifeline discount. NTCA noted that this process is extremely burdensome for NTCA members that typically employ approximately 25 total staff members. The FCC staff reviewed various approaches undertaken by states under which a centralized database is used to perform the eligibility determination. NTCA noted that it is reviewing the various state approaches but agreed that each is worthy of examination in considering how to improve the administration of the program for both consumers and service providers.

NTCA also provided thoughts on potential short-term measures that might require Lifeline service providers to retain confidential eligibility documentation obtained from consumers. Specifically, NTCA urged the Commission to consider such proposals carefully due to the potential consumer privacy implications and the increased administrative burdens they could impose on smaller providers.

Marlene H. Dortch  
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Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS.

Sincerely,  
/s/ Brian J. Ford  
Brian J. Ford  
Regulatory Counsel

cc: Jonathan Lechter  
Radhika Karmarkar  
Christopher Cook