



February 21, 2020

Filed Via ECFS

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

RE: Bridging the Digital Divide for Low-Income Consumers, WC Docket No. 17-287; Federal-State Joint Board on Universal Service – Lifeline and Link-Up Reform and Modernization, WC Docket No. 11-42; Telecommunications Carriers Eligible to Receive Universal Service Support, WC Docket No. 09-197

Dear Ms. Dortch:

On Wednesday, February 19, 2020, Gerry Duffy, and the undersigned representing WTA – Advocates for Rural Broadband (“WTA”) met with Nicholas Page, Jodie Griffin, Ryan Palmer, and Trent Harkrader of the Wireline Competition Bureau.

WTA gave an overview of its recently filed Petition for Reconsideration that requested the Commission reconsider placing the same Universal Service Administrative Company (“USAC”) Lifeline Representative Accountability Database (“RAD”) registration requirements on Lifeline enrollment representatives directly employed by facilities-based eligible telecommunications carriers (“ETCs”) as the sales agents and enrollment representatives employed by wireless resellers with Lifeline-only ETC designations.¹ Specifically, WTA asserted that there is a lack of a documented history of Lifeline waste, fraud, and abuse committed by enrollment representatives directly employed by facilities-based ETCs that would warrant using the same requirements for both groups.

As it pertains to rural local exchange carriers (“RLECs”), WTA noted that the employees tasked with Lifeline enrollment are general customer service representatives that handle a multitude of tasks related to the general customer base such as ordering of new services, service malfunctions, and billing and payment questions. If a customer is identified as potentially eligible for the Lifeline program, customer service representatives simply submit the required documentation to USAC via the National Verifier or manually if need be. Therefore, their exposure to the Lifeline program, as well as any opportunity to commit waste, fraud, and abuse, is limited.

Indeed, while WTA members offer and advertise Lifeline service as part of their ETC obligations, WTA asserted that they do not view the program as a profit center. WTA members do not task their customer service representatives with finding new Lifeline subscribers, and they do not use enrollment quotas or pay sales commissions that would encourage their customer service representatives to engage in waste, fraud, and abuse.

¹ Petition for Reconsideration of WTA – Advocates for Rural Broadband, WC Docket Nos. 17-287, 11-42, 09-197, filed on January 27, 2020.

WTA noted that this disposition is dissimilar from wireless resellers with Lifeline-only ETC designations. Lifeline-only ETCs are more likely to view the program as a profit center and utilize business practices that increase the potential for abusing the program. For example, paying sales commissions for enrolling Lifeline subscribers encourages agents to commit the types of fraud that were alleged in the Inspector General's memorandum, which detailed how sales agents inappropriately seek approval of multiple Lifeline benefits by submitting variations of a single Lifeline customer's enrollment information.² WTA argued that considering this and the documented history of waste, fraud, and abuse by wireless resellers, it is logical for the Commission to require their sales agents and enrollment representatives to register with a USAC database using personal information including their personal address and the last 4 digits of their social security number. However, it makes little sense to place the same registration requirements on RLECs and other facilities-based carriers that do not have such a documented history of waste, fraud, and abuse.

WTA proposed that USAC should collect less intrusive information from enrollment representatives directly employed by facilities-based ETCs such as the employee's name or worker ID number, work telephone, work email, and work mailing address, which would still allow USAC to trace any waste, fraud, and abuse back to an individual ETC employee in the rare instances it occurs. Should fraud occur by a facilities-based ETC, WTA voiced its support for placing stricter RAD requirements on the ETC and its enrollment representatives. WTA also supports placing stricter RAD registration requirements on any sales agents employed by facilities-based ETCs.

Pursuant to Section 1.1206(b) of the Commission's Rules, this submission is being filed for inclusion in the public record of the referenced proceeding.

Respectfully submitted,
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cc:
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Jodie Griffin
Ryan Palmer
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² Memorandum, Advisory Regarding Fraud in the Lifeline Program, Federal Communications Commission: Office of the Inspector General, published on April 16, 2019.