

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter(s) of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 17 - 287
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible For Universal Service Support)	WC Docket No. 09-197

**REPLY COMMENTS OF THE
NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS**

The National Association of Regulatory Utility Commissioners (“NARUC”), respectfully submits these comments to respond to comments filed pursuant to the Federal Communications Commission’s (“FCC” or “Commission”) July 11, 2018 Notice¹ seeking comment on the *Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier*.² NARUC agrees with the other comments filed and urges the Commission to grant the Petition to assure an efficient and cost-effective Lifeline enrollment process for consumers and Lifeline service providers.

¹ *Wireline Competition Bureau Seeks Comment on Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier*, FCC Notice DA 18-718, WC Docket Nos. 17-297, 11-42, 09-197 (Released July 11, 2018) (“Notice”).

² See *Emergency Petition of Q-Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier*, WC Docket Nos. 17-287, 11-42, 09-197 (filed July 5, 2018) (“Q Link Petition” or “Petition”).

DISCUSSION

The Commission should immediately issue an order requiring USAC to implement Application Programming Interfaces (APIs) for the National Verifier in the manner specified in the Q Link Petition. As explained in [NARUC's](#) comments³ and outlined in NARUC's July 2018 Summer Policy Summit *Resolution to Implement Expeditiously a Properly Functioning and Consumer-Friendly Federal Lifeline National Eligibility Verifier*, incorporating APIs into the National Verifier is a simple programmatic change that will yield numerous benefits for Lifeline consumers and providers.

[Sage Telecom Communications, LLC](#), [TracFone Wireless, Inc](#), [the National Lifeline Association](#), and [Sprint](#) filed comments that agree with NARUC.⁴ In addition, New America's Open Technology Institute, Access Humboldt, Benton Foundation, Center for Rural Strategies, Common Cause, Consumers Union, Electronic Frontier Foundation, Free Press, NAACP, the National Consumers League, National Digital Inclusion Alliance, National Hispanic Media Coalition, Native Public Media, Public Knowledge, The Greenlining Institute, and the United Church of Christ (Joint Commenters) submitted [a joint letter](#) on the Q-Link

³ See [Comments of the National Association of Regulatory Utility Commissioners](#), filed August 10, 2018; *In the Matters of Lifeline Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197.

⁴ See the separate [Comments of Sage Telecom Communications, LLC d/b/a/TruConnect in support of Q Link Wireless LLC's Emergency Petition](#), [Comments of TracFone Wireless, Inc, National Lifeline Association Comments on Emergency Petition of A Link Wire3less, LC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier](#), and [Comments of Sprint Corporation](#), all filed August 10, 2018; *In the Matters of Lifeline Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197.

Petition.⁵ The Joint Commenters,⁶ “support an interface that will clearly and easily direct consumers to the USAC eligibility verifier and easily redirect consumers back to the provider of their choice once their eligibility has been verified.” They also, like NARUC and others, question why the FCC removed the carrier-national verifier API without explanation.

No other comments were filed.

In its comments, Sprint Corporation accurately points out that provision of an API “will result in a more user-friendly experience” for consumers and “will significantly reduce the administrative and customer service burdens” on both the National Verifier and the Universal Service Administration Company.⁷ NARUC agrees that use of APIs will in no way compromise the National Verifier’s ability to make eligibility determinations, nor will it allow a provider to impermissibly insert itself into the eligibility determination process. Use of APIs will, however, make the application process easier and more understandable for the end user.⁸

⁵ See [Letter to FCC Chairman Pia from New America’s Open Technology Institute, Access Humboldt, Benton Foundation, Center for Rural Strategies, Common Cause, Consumers Union, Electronic Frontier Foundation, Free Press, NAACP, the National Consumers League, National Digital Inclusion Alliance, National Hispanic Media Coalition, Native Public Media, Public Knowledge, The Greenlining Institute, and the United Church of Christ](#), filed August 10, 2018; *In the Matters of Lifeline Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197.

⁶ Id. at 2.

⁷ [Comments of Sprint Corporation](#), at 2, filed August 10, 2018; *In the Matters of Lifeline Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197.

⁸ Id. at 3.

Lifeline provider employees are able to assist consumers that apply with the carrier in-person with navigating USAC’s eligibility verification process via a specialized web portal. That option is not available for the homebound. As Sage Telecom Communications, LLC correctly concludes, the absence of carrier APIs discriminates unfairly against the homebound elderly or disabled Americans who are unable to be part of an in-person enrollment process.⁹ Like Sprint, they detail the obvious economic efficiencies APIs will necessarily bring to the National Verifier rollout.¹⁰ Sage also explains how incorporation of a carrier API will assure that providers will retain the financial incentive to provide services to qualifying consumers in low density areas.¹¹

⁹ [Comments of Sage Telecom Communications, LLC d/b/a/TruConnect in support of Q Link Wireless LLC’s Emergency Petition](#), at 2 -3, filed August 10, 2018; *In the Matters of Lifeline Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197.

¹⁰ *Id.* at 5-6 (“Without Carrier APIs, Program Costs and Burdens of the USF Will Increase.”)

¹¹ *Id.* at 4-5 (“Without Carrier APIs, ETS will Face Greater Difficulty in Expanding Lifeline to Rural Areas.”)

[TracFone Wireless, Inc](#)¹² and [the National Lifeline Association](#)¹³ make similar arguments.

CONCLUSION

The facts and the record presented for FCC action on the Q Link Petition are clear. As the NLAD experience has demonstrated, carrier-assisted online enrollment has emerged as a critical tool for expanding wireless Lifeline service to rural, disabled, and homebound Americans. It has been the crucial bridge allowing carriers to reach hundreds of thousands of rural low-income consumers nationwide.

The absence of a carrier API from the National Verifier, however, will make it extremely difficult for these Americans to get the help they need to navigate the eligibility verification process, even though their urban counterparts would benefit from in-person assistance provided through a dedicated National Verifier sales agent

¹² [Comments of TracFone Wireless, Inc](#), at 2 -9, filed August 10, 2018; *In the Matters of Lifeline Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197 , arguing that (i) without APIs, Lifeline enrollment will be unnecessarily difficult and burdensome for qualified Americans, the cumbersome enrollment process will undermine partnerships between service providers and third-party organizations focused on facilitating enrollment for qualified Americans, and (iii) the eligibility verification process will be financially and administratively burdensome and vulnerable to abuse.

¹³ [National Lifeline Association Comments on Emergency Petition of A Link Wire3less, LC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier](#), at 2, filed August 10, 2018; *In the Matters of Lifeline Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, WC Docket Nos. 17-287, 11-42, and 09-197. (“NaLA supports the Q Link Petition because the Commission’s and USAC’s failure to include a service provider API in the National Verifier would have a severely negative impact on all Lifeline service provider business models (including in-person enrollments) and eligible low-income Americans.”).

portal. Significantly, APIs will also significantly reduce the annual operating costs for the National Verifier (and the American taxpayer).

The Commission should direct USAC to restore carrier APIs prior to the National Verifier's hard launch, which would harmonize USAC's implementation with its initial plans, and with the Commission's Order establishing the National Verifier.

Respectfully submitted,

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