

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of a Repository Case in Which to )  
Gather Information About the Lifeline Program ) **File No. TW-2014-0012**  
And Evaluate the Purposes and Goals of the )  
Missouri Universal Service Fund )

**COMMENTS OF CRICKET COMMUNICATIONS, INC.**

Cricket Communications, Inc. (“Cricket”) respectfully submits the following comments in response to the Commission’s *Notice of Opportunity to Comment* of July 26, 2013. Specifically, Cricket is offering comments on items “h” through “k” of the list set out in the *Notice of Opportunity to Comment*.

h. Do you anticipate the FCC’s reforms, when fully implemented, will adequately address fraud, abuse and waste within the Lifeline program? Why or why not?

Cricket welcomes the implementation of the National Lifeline Accountability Database (NLAD) and believes it will curtail waste, fraud, and abuse in the Lifeline Program. NLAD will be the first duplicate check between and among carriers. This step alone will go a long way to combat fraud, waste and abuse. Additionally, NLAD will require carriers to validate identification and addresses.

i. What specific compliance efforts would be easy to implement to ensure companies and consumers comply with Lifeline program requirements?

Other states have implemented rules such as minimum minutes/minimum billing requirements and have issued guidelines on mobile marketing that have helped ensure compliance with the Lifeline program. Requiring carriers to provide Lifeline customers a minimum number of minutes per month or require a minimum charge per month can reduce the risk of duplicate support being provided through the Lifeline program.

Additionally, guidelines on mobile marketing – such as requiring easy-to-read signage, clearly identifying the names of the company and the employee, and requiring property manager approval to establish a phone distribution location – have all been successfully used by some states to promote compliance.

j. Should the State of Missouri strive to implement a data base to confirm Lifeline subscriber eligibility? If yes, how should it be funded?

A database alone is insufficient to confirm Lifeline subscriber eligibility and it may result in eligible subscribers being unable to receive the benefit. Unless the database has access to and can validate against every program or income requirement that a subscriber can use to confirm eligibility, it will be an incomplete source to determine Lifeline eligibility.

k. What other issues should be considered in this workshop proceeding?

The approval of an online or e-version of the Lifeline application would ensure thorough completion of an application prior to processing and greatly reduce clerical errors due to transcribing a paper application into an electronic database.

WHEREFORE, Cricket Communications, Inc. respectfully submits these comments for the Commission's consideration.

Respectfully submitted,

**/s/ William D. Steinmeier**

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