

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Bridging the Digital Divide for Low-Income Consumers)	WC Docket No. 17-287
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No 11-42
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	

COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”), pursuant to the Public Notice released on July 11, 2018 (DA 19-718), hereby respectfully submits its comments in support of the petition filed by Q Link Wireless in the above-captioned proceedings.¹ The Commission should grant Q Link’s petition and issue an order directing USAC to implement machine-to-machine interfaces (application programming interfaces, or “APIs”) for the National Verifier (“NV”). Implementation of APIs will make the NV more efficient and effective, and thus will improve the Lifeline program.

Sprint has long supported the deployment of a neutral third party NV to determine end users’ Lifeline eligibility, and believes that the NV will help minimize waste, fraud and abuse in the Lifeline program as well as reduce service provider liability for incorrect eligibility determinations in the application process. Incorporation of appropriate APIs in

¹ “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,” filed July 5, 2018.

the NV will result in a more user-friendly experience for end users attempting to enroll in the Lifeline program, and will significantly reduce the administrative and customer service burden on the NV and USAC.

1. APIs Are Critical for On-Line Enrollment By All End Users

In its petition (p. 2), Q Link asserts that APIs are critically important to rural consumers and others who apply for Lifeline service primarily on-line, because applying in-store or via live agents is often not an option. The current lack of APIs means that on-line consumers “cannot come to the ETC first, apply to the ETC for service, and, as part of that application procedure, enlist the assistance of an ETC as they navigate USAC’s process to confirm consumer eligibility.”²

Sprint believes that APIs are critical for on-line enrollment by all end users – rural, suburban and urban – whether the end user is applying entirely on his own, or with the assistance of a live agent, on a website or through a mobile application. As Q Link correctly notes (fn. 34), the lack of carrier APIs “...prevents ETCs that use on-site personnel from creating an efficient and integrated process for the consumer.” Without an API, a live agent cannot forward personal information provided by the consumer to the service provider to the NV, or receive information provided by the consumer to the NV; thus, the end user must enter his personal information twice (once to the NV for purposes of determining his Lifeline eligibility, and once to the ETC for purposes of applying for that ETC’s Lifeline service). This is not a user-friendly process and could discourage eligible low-income Americans from undertaking or completing the process for applying for Lifeline service.

² Petition, p. 3.

Use of APIs will in no way compromise the NV's ability to make eligibility determinations, nor will it allow the ETC 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.

2. APIs Will Reduce USAC/NV's Administrative Costs

By enabling machine-to-machine exchange of information, APIs will allow service providers to assist potential Lifeline customers in real time, including answering ETC-specific questions that USAC or other NV representatives cannot answer, and helping customers to submit a complete and legible application package. This will result in substantial savings in administrative and customer care expenses for the NV/USAC.

Q Link states that in the current environment, it collects on average 4.5 documents for every successful enrollment; that it handles 1.7 million customer support calls, 12 million emails, and 15,000 social media interactions per month to support on-line enrollment; and that it received about 34 million inquiries in a year, which were "whittled down" to 855,000 applications actually sent to NLAD.³

Like Q Link, Sprint also works extensively with Lifeline applicants and potential applicants to answer questions about Assurance Wireless' Lifeline offer (coverage, service plan features and options, what devices are available and compatible on the Sprint network, etc.), to help ensure that the application is properly filled out, and to help ensure that the proper (and legible) eligibility documentation is provided. Assurance Wireless denies as many as 75% of applications received (depending on the sales channel) because

³ Petition, pp. 19 and 24.

they were incomplete or because the information provided indicated that the applicant is likely ineligible for Lifeline service.

If Assurance Wireless, Q Link, and the dozens of other ETCs are divorced from the initial screening process because of lack of APIs, the NV/USAC likely will be flooded with millions of consumer inquiries and incomplete or unacceptable applications.⁴ While USAC doubtless is planning for an increased work load in the NV environment, it is not clear to Sprint that USAC has accurately anticipated the likely volume of calls, emails, and incomplete applications. Use of APIs will allow ETCs to continue to field many of the consumer inquiries, thereby reducing USAC's costs of administering the Lifeline program and speeding up the eligibility determinations.

The administrative savings to the NV/USAC will almost assuredly exceed the costs to deploy API functionality.⁵ APIs have been routinely deployed for decades with numerous software applications (including APIs that allow ETCs to interact with NLAD), and there is no reason to expect that integration of APIs into the NV system would require extraordinary or highly specialized programming. Because APIs will make the NV more efficient, effective, and user-friendly, the Commission should direct USAC to integrate appropriate APIs in the NV system before the hard launch date.

⁴ Because Lifeline service cannot be established until the NV determines that the end user applicant is eligible, the first step in the process will be for the end user to seek an eligibility ruling from the NV. Many end users will seek answers to all of their Lifeline questions from the first point of contact, *i.e.*, the NV/USAC.

⁵ See Petition, p. 5 (“it would take only 20 additional person hours to develop and implement the necessary APIs”).

Respectfully submitted,

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