



Lifeline Program

Lifeline eligible telecommunications carriers (“ETCs”) turn to DWT for our extensive and in-depth experience handling market entry and compliance issues at both the federal and state levels. DWT has a dedicated Lifeline team that lives and breathes the Lifeline program every day. We represent top-10 Lifeline ETCs as well as much smaller firms. We are highly experienced in ETC legal issues, but more importantly, we understand how the legal issues affect your business.

Dedicated lawyers with experience and perspective.

In January 2012, the FCC adopted a comprehensive overhaul of the Lifeline program, including a proposal to require “Lifeline resellers” to obtain formal certification as ETCs. The FCC’s action presents compliance and operational challenges—but also real business opportunities—for Lifeline providers. We can help you succeed in this new environment. Our services include:

ETC designation and FCC compliance plans

Under the FCC’s new rules, scale is critical. We can help you grow by obtaining ETC designations in the markets you wish to serve. DWT acts as national counsel for Lifeline providers and seamlessly coordinates with a network of local firms, as needed. In addition, entities without their own complete telecommunications network must have a compliance plan approved by the FCC. We prepare compliance plans targeted to our clients’ actual business practices and operations—not “cookie cutter” compliance plans that may not suit your needs.

Audits and regulatory inquiries

Audits and inquiries from regulators are a fact of life for Lifeline providers—they are a matter of “when,” not “if.” We have extensive experience responding to regulatory inquiries and audits, including those originating from the administrator of the Lifeline program (USAC). When your business is audited, DWT attorneys will stand by your side throughout the process.

Regulatory compliance

The FCC's new Lifeline order affects all aspects of a Lifeline provider's business: marketing and advertising, service plans, customer eligibility and enrollment, service terms and conditions, customer service, handset distribution, and more. We can guide your business through the maze of new rules and keep you in compliance to ensure full Lifeline payments from USAC and to avoid penalties.

Obtaining Lifeline universal service funding

We regularly assist clients with implementing best practices regarding filing forms (497s) needed to receive Lifeline funding on a timely basis and compiling documentation necessary to back up those funding claims in the event of an audit.

Advocacy

DWT attorneys have established relationships with key Lifeline decision-makers at the FCC, state commissions and USAC. We can help you shape the direction of federal or state Lifeline rules by preparing comments or by meeting directly with key officials.

If your company is a Lifeline provider or if you are interested in learning more about the program, contact us.

LIFELINE PROGRAM PRACTICE



DANIELLE FRAPPIER | Partner, Washington, DC
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Danielle Frappier counsels communications entities regarding legal and regulatory matters, including compliance, market entry, licensing, and regulatory fees, with a particular focus on universal service matters, including contribu-

tion, and the Lifeline, E-rate, and High Cost/CAF programs. Danielle leads the firm's Lifeline program team, and is deeply involved in policy, legal and business matters for her clients at both the federal and state levels. She represents multiple top-10 ETCs. Danielle is the "go to" lawyer for USAC audits of Lifeline, E-rate and High Cost disbursements, as well as audits of universal service contributions (USF fees and FCC Form 499 reporting).



JAMES M. SMITH | Of Counsel, Washington, DC
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Jim Smith centers his practice in telecommunications and government relations. A telecommunications industry veteran, Jim has over 30 years of experience as an attorney, industry association leader and communications

company executive. He not only advises clients on complex regulatory issues, but has developed policies and influenced laws and regulations impacting the industry.



ADAM SHOEMAKER | Associate, Washington, DC
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Adam Shoemaker focuses on the legal and regulatory needs of communications clients, particularly ETCs before the FCC and state public utility commissions. He has drafted and filed designation petitions and advocacy

comments throughout the country for wireless ETCs seeking to participate in the Lifeline program, which helps provide telephone service to low-income Americans. As a part of the firm's Lifeline program team, Adam has wide experience in assisting ETC clients navigate the complex rules and practical realities associated with the Lifeline program at the state and federal levels.



JAMES W. TOMLINSON | Associate, Washington, DC
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Jim Tomlinson draws on more than 25 years of experience in the communications industry to help clients with a wide range of telecommunications and cable issues, including federal, state, and local regulatory matters, program-

ming network issues, and contract negotiation and enforcement. Jim's clients include wireless carriers, VoIP providers, competitive local exchange carriers (CLECs), cable and broadband providers, and cable programming networks. Jim regularly assists top-10 ETCs and smaller carriers obtain state and federal ETC designations; respond to audits and regulatory inquiries, maintain regulatory compliance and advocate their positions with key Lifeline decision-makers at the FCC.