

March 1, 2016

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Ajit Pai
Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization

Dear Chairman Wheeler and Commissioners Clyburn, O’Rielly, Pai, and Rosenworcel:

The undersigned parties – broadband Internet access providers and consumer and public interest organizations – share the Commission’s goal of modernizing the Universal Service Lifeline program to help ensure that all Americans have access to modern communications services. We all agree that it is time that Lifeline eligible consumers have the opportunity to use their benefit to reduce the cost of subscribing to broadband Internet access service.

In order for the addition of broadband Internet access to have the desired impact, however, we also believe that the Commission must make other critical changes to the program. First, eligibility and recertification functions currently performed by service providers must be promptly and completely handed over to a third-party verifier/administrator. This step will both strengthen the program and reduce the costs to providers of serving the Lifeline market. Second, the Commission should encourage broad provider participation in the new broadband Lifeline program. To do so, the Commission should centralize and streamline the process of authorizing providers to offer Lifeline-supported broadband Internet access service. The Commission has the legal authority to make this change and the policy rationale for doing so is compelling. All Lifeline-eligible consumers deserve broadband, and without widespread provider participation, eligible consumers may not have access to Lifeline-supported broadband Internet access service.

To fulfill the vital purpose of bringing broadband to those who otherwise cannot afford it, we want both the broadest participation possible and the flexibility to create innovative solutions. This requires a uniform national policy that, while preventing fraud and abuse, encourages maximum participation and encourages innovative ways to provide affordable broadband. Unfortunately, creating such a broadband Lifeline program is incompatible with the current process of approving authorized providers.

We look forward to continuing to work with the Commission on updating the Lifeline program and the creation of a new Lifeline program targeting broadband for the needs of today's consumers.

Sincerely,

Access Humboldt
American Library Association
AT&T
Benton Foundation¹
Center for Media Justice
Center for Rural Strategies
CenturyLink
Comcast
Common Cause
Common Sense Kids Action
Connected Nation, Inc.
Cox Communications
EveryoneOn
Frontier Communications
Media Mobilizing Project
Multicultural Media, Telecom and Internet Council
National Digital Inclusion Alliance
National Hispanic Media Coalition
OCA – Asian Pacific American Advocates
Public Knowledge
Schools, Health & Libraries Broadband Coalition
The Greenlining Institute
Verizon

¹ The Benton Foundation is a nonprofit organization dedicated to promoting communication in the public interest. These comments reflect the institutional view of the Foundation and, unless obvious from the text, are not intended to reflect the views of individual Foundation officers, directors, or advisors.