



February 21, 2018

Chairman Ajit V. Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

CLOSE THE DIGITAL DIVIDE, PROTECT THE LIFELINE PROGRAM
WC Docket Nos. 17-287, 11-42, 09-197

Dear Chairman Pai:

On behalf of The Leadership Conference on Civil and Human Rights and the 200 undersigned organizations that work directly with and advocate for low-income people, people of color, seniors, families struggling to find housing, people with disabilities, residents of rural areas, veterans, victims of domestic violence, health care providers, educators, and students, we urge you to reject the Federal Communications Commission's (FCC's) new proposals that will debilitate the Lifeline program, the only federal program targeted at assisting low-income households with the cost of broadband and telephone service. Each of our organizations knows broadband Internet access is a vital tool that remains elusive for our diverse communities. Telephone access is similarly essential and costly. We urge you, as a chairman who asserts his highest priority is closing the digital divide, to make good on that promise and bolster, not undermine, the Lifeline program.

The Lifeline program is a public-private partnership created in 1985 during the Reagan administration to help defray the cost of communications for low-income households. Lifeline leverages competition to permit consumers to choose among participating carriers and to select among approved voice-only service plans, broadband-only service plans, or bundled voice and data service plans from wireline or wireless companies. As of last year, Lifeline assisted more than 12 million participants, at least 6.5 million of whom are receiving broadband after the FCC modernized the program to include broadband. As such, the Lifeline program is targeted to assist low-income people with the most significant barrier to connectivity – cost.

The proposals issued by the Federal Communications Commission would gut this critical program by taking steps to:

- eliminate service for approximately 70 percent of current participants, particularly mobile services;
- restrict voice service support to only low-income households in rural areas; and
- overlay existing means-testing and program integrity measures with ineffective and administratively complex budgetary limits and mandatory co-pays, which will hurt our country's most economically fragile households.

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Asian Americans Advancing Justice |
AAJC

Policy and Enforcement
Committee Chair
Michael Lieberman
Anti-Defamation League
President & CEO
Vanita Gupta



We urge the Commission to heed these four points:

- 1. Keep the focus of Lifeline on people, not networks.** The proposal to eliminate carriers following particular business models (such as resellers) will result in cutting off approximately 70 percent of all current Lifeline participants. Other carriers that are not resellers have been exiting the Lifeline program and have shown no ability or interest in stepping in to serve low-income families. The FCC erroneously justifies these proposals by arguing they are needed to promote broadband infrastructure in rural areas, ignoring its own \$4.5 billion rural program targeted for this goal. These programs are complementary: one aims to spur deployment to rural areas, while the Lifeline program ensures low-income people in rural and urban areas can afford service. Redirecting Lifeline to support infrastructure will leave low-income households with no support.
- 2. Protect Lifeline voice service for all consumers.** The FCC is proposing to support subsidized voice services in rural areas, but not in urban areas. All low-income households should be free to choose voice services. Most current Lifeline consumers have a voice/data bundle. Voice service is critical for access to 911 emergency services. An entire community benefits when everyone can report criminal activity, fires, or other emergency conditions.
- 3. Rationing Lifeline hurts the poor and hurts the country.** The FCC proposes to cap the size of the Lifeline program and contemplates a complex administrative process to prioritize eligible households. The Commission has also raised the possibility of placing a lifetime cap on an individual Lifeline recipient's support. Neither of these proposals address program integrity, and both create unpredictability for low-income people who might languish on wait-lists to receive connectivity at a time of urgent need, or as senior citizens and others use up their Lifeline benefit and are forced to purchase at market rates. Moreover, unable to ascertain whether they will continue to receive predictable revenue, the few remaining carriers will likely exit. Such a proposal is cruel and administratively burdensome to no purpose – the Lifeline program is available only to eligible low-income households and in 2015 the FCC adopted augmented program integrity measures, which are being implemented right now. A better means to ensure efficient use of Lifeline dollars would be to continue the 2016 reforms that maximized the number of companies participating in Lifeline.
- 4. Mandating a co-pay for Lifeline will eliminate the most popular Lifeline service that helps some of the most vulnerable low-income consumers.** The current Lifeline program is technology-neutral and companies can develop new Lifeline service packages as long as they meet FCC-imposed minimum standards. The new FCC proposal would use a heavy hand to eliminate the Lifeline services that are the most popular in the marketplace, such as products that offer a price point identical to the federal subsidy and thus do not require payment by the consumer. These products are ideal for the most economically fragile subscribers because they do not require a deposit, a credit check, late fees, or a checking account or some other means to make a monthly payment. If these proposals are adopted, homeless veterans, domestic violence victims, victims of natural disasters, and many others would be left without assistance.



We strongly oppose the proposed changes, which would exacerbate the digital divide and devastate families enrolled in Lifeline. Each of our organizations has seen the positive impact of fixed and mobile telephone service and broadband connections. Access to broadband and telephone enables access to education and job opportunities, invaluable health information, and social services. Broadband is essential for any child or adult who goes to school or seeks to further enhance their skills. We urge you to reject the FCC's new proposals on Lifeline and stand by the low-income people of this country.

Sincerely,

The Leadership Conference on Civil and Human Rights
18MillionRising.org
2-1-1 Humboldt, Eureka, CA
Access Humboldt, Humboldt County, CA
Addiction Connections Resource, Havre De Grace, MD
Alliance of Information and Referral Systems (AIRS)
American Civil Liberties Union
American Library Association
Anti-Hunger & Nutrition Coalition, Seattle, WA
Anti-Poverty Network of New Jersey
Appalachian Independence Center, Inc., Abingdon, VA
Appalshop, Inc., Whitesburg, KY
Arise for Social Justice, Springfield, MA
Asian Americans Advancing Justice - AAJC
Asian Law Alliance, San Jose, CA
Asian Pacific American Labor Alliance, AFL-CIO
Association of Assistive Technology Act Programs (ATAP), Springfield, IL
Association of Programs for Rural Independent Living
Autistic Self Advocacy Network
Benedictine Sisters of Baltimore, Lutherville, MD
Benton Foundation
BioLogistics LLC, Ames, IA
Blue Ridge Independent Living Center, Roanoke, VA
Bucks County Housing Development Corporation, Fallsington, PA
Bucks County Women's Advocacy Coalition, Doylestown, PA
California Center for Rural Policy
California Educational Technology Professionals Association (CETPA), Sacramento, CA
Center for Family Services, Clementon, NJ
Center for Independence of the Disabled, New York, NY
Center for Media Justice
Center for Rural Strategies, Inc.
Children's Advocacy Institute
The Children's Agenda, Rochester, NY
The Children's Partnership

Citizens Action Coalition of Indiana
Coalition on Human Needs
Common Cause
Common Frequency
Common Sense Kids Action
Communications Workers of America
Communities Actively Living Independent & Free, Los Angeles, CA
Community of Vermont Elders
Community Technology Network, San Francisco, CA
Computer Reach, Pittsburgh, PA
Congregation of Our Lady of Charity of the Good Shepherd, US Provinces
Connect Your Community, Cleveland, OH
Connected Insights, Cleveland, OH
Creative Interventions, Los Angeles, CA
CreaTV San Jose, San Jose, CA
CREDO
CUE, Inc., Coarsegold, CA
Daily Kos
DANEnet, Madison, WI
Dayle McIntosh Center, Anaheim, CA
Demand Progress
Demos
DigitalC, Cleveland, OH
Dignity and Power Now, Los Angeles, CA
Disability Law Center, Salt Lake City, UT
Disability Law Colorado
Disability Rights California, Sacramento, CA
Disability Rights South Dakota
Disability Rights Vermont, Montpelier, VT
Disabled In Action of Metro NY
Eastern Shore Center for Independent Living, Inc., Accomack, VA
El Centro de la Raza, Seattle, WA
Ella Baker Center for Human Rights
Embarras River Basin Agency, Inc., Greenup, IL
Empower Missouri
Equal Justice Society, Oakland, CA
Farmworker Association of Florida
First District Supervisor - County of Humboldt
FL Alliance of Community Development Corporations, Inc.
Focus: HOPE, Detroit, MI
Food Bank of the Southern Tier, Elmira, NY
Food for People, the Food Bank for Humboldt County, Eureka, CA
Franciscan Action Network

Franciscans for Justice, Sacramento, CA
Free Press
FREE! Families Rally for Emancipation and Empowerment
Future of Music Coalition
Generation Justice, Albuquerque, NM
Global Action Project, New York, NY
Greater Edgemont Community Coalition of Dayton, OH
Greater Hartford Legal Aid, Hartford, CT
Greater New York Labor Religion Coalition, New York, NY
The Greenlining Institute
Holy Spirit Missionary Sisters, USA-JPIC
Hope Community, Minneapolis, MN
human-I-T, Los Angeles, CA
IBSA, Inc., Topeka, KS
Immigrant Family Support Network, Wichita, KS
Impact Fund
Institute for Local Self-Reliance
Instituto de Educacion Popular del Sur de California (IDEPSCA), Los Angeles, CA
Integrated Refugee & Immigrant Services, Connecticut
Islamic Society of North America
The John Leary Organization, Philadelphia, PA
Just Us Women Productions, LLC
Justice in Aging
Kansas Action for Children
Kansas Appleseed
Kansas Center for Economic Growth
Kentucky Coalition Against Domestic Violence
League of Women Voters of St. Lawrence County, Canton, NY
Line Break Media, Minneapolis, MN
Los Angeles LGBT Center, Los Angeles, CA
Martinez Street Women's Center, San Antonio, TX
Media Alliance, San Francisco Bay Area
Media Mobilizing Project, Philadelphia, PA
Middle Way House Inc., Bloomington, IN
Mississippi Center for Cultural Production, Utica, MS
Mobile Citizen
Mobilization for Justice, New York, NY
NAACP
National Advocacy Center of the Sisters of the Good Shepherd
National Association of Nutrition and Aging Services Programs (NANASP)
National Coalition for the Homeless
National Consumer Law Center, on behalf of its low-income clients
National Consumers League

National Council of Churches
National Council of Jewish Women / Maine, Portland, ME
National Digital Inclusion Alliance
National Disability Rights Network
National Hispanic Media Coalition
National LGBTQ Task Force
National Organization for Women
National Urban League
Native Public Media
Nevada Disability Advocacy & Law Center
New America's Open Technology Institute
New Jersey SHARES, Inc., Ewing, NJ
New Jersey State Industrial Union Council
New Sanctuary Coalition, New York, NY
Next Century Cities
North Carolina Council of Churches
North Dakota Protection & Advocacy Project
Northstar Digital Literacy Project
The Oak Hill Collaborative, Youngstown, Ohio
OCA - Asian Pacific American Advocates
Older Adults Technology Services, Inc. (OATS), New York, NY
Open Access Connections
OpenMedia
OVEC-Ohio Valley Environmental Coalition, Huntington, WV
Pacific Northwest Conference of the United Church of Christ, Seattle, WA
Parent Voices California
Partner Cafe-Bridging the Gap Across Sectors, University Place, WA
Partners Bridging the Digital Divide
Partnership for America's Children
PathWays PA, Folsom, PA
Pennsylvania Coalition Against Domestic Violence
Pennsylvania Council of Churches
People Organized for Our Rights, Inc. (P.O.O.R.), Hamilton Beach, New York
PhillyCAM, Philadelphia, PA
Progressive Technology Project
Project Appleseed
Project IRENE, Chicago, IL
Prometheus Radio Project
Protection and Advocacy for People with Disabilities, Inc.
Provincial Council Clerics of St. Viator
Public Health, New York, NY
Public Justice Center, Baltimore, MD
Public Knowledge



Public Utility Law Project of New York, Albany, NY
Queen Anne Helpline, Seattle, WA
Queens Action Council, Queens, NY
R.A.A. - Ready, Aim, Advocate, Saint Louis, MO
RESULTS Greater Boston
Right Here, Right Now Project, Pittsboro, NC
Rolling Start Inc. Disability Advocacy, Resources and Training, San Bernardino, CA
SafeNet, Domestic Violence Safety Net, Erie, PA
Saint Patrick Church, Kankakee, IL
Sargent Shriver National Center on Poverty Law
Schenectady Community Action Program, Schenectady, NY
Schenectady Inner City Ministry, Schenectady, NY
Schools, Health & Libraries Broadband (SHLB) Coalition
Silicon Harlem, New York, NY
Sisters of Charity of Nazareth Congregational Leadership
Sisters of Charity of Nazareth Western Province Leadership
Sisters of Mercy NH Justice Committee, Manchester, NH
Sisters of Mercy South Central Community
Sisters of the Most Precious Blood of O'Fallon, MO
Sisters of the Presentation of the Blessed Virgin Mary, New Windsor, NY
SocioEnergetics Foundation
South Carolina Appleseed Legal Justice Center
SouthWest Organizing Project, Albuquerque, NM
St. Paul Neighborhood Network, St. Paul, MN
Step Up Savannah, Savannah, GA
The Arc of the United States
Three Square Food Bank, Las Vegas, NV
UltraViolet
United Church of Christ Disabilities Ministries
United Church of Christ, Justice and Witness Ministries
United Church of Christ, OC Inc.
United for Peace and Justice
Urbana-Champaign Independent Media Center, Urbana, IL
The Utility Reform Network (TURN)
Vermont Coalition for Disability Rights
West Side Campaign Against Hunger, New York, NY
WinstonNet, Winston-Salem, NC
Women and Girls Foundation, Pittsburgh, PA

cc: Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel