Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
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Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Bridging the Digital Divide for Low-Income Consumers	)	WC Docket No. 17-287
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
Affordable Connectivity Program	)	WC Docket No. 21-450
	)	
Emergency Broadband Benefit Program	)	WC Docket No. 20-445

REPLY COMMENTS OF
PUBLIC KNOWLEDGE AND NATIONAL DIGITAL INCLUSION ALLIANCE

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TABLE OF CONTENTS

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	)	
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	)	
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I. Introduction and Summary

Public Knowledge and the National Digital Inclusion Alliance ("Joint Commenters") submit these reply comments to the Federal Communications Commission ("FCC" or "Commission") in response to the Notice of Proposed Rulemaking ("NPRM") in the above-referenced proceedings. The Commission is tasked with the statutory goal of ensuring that "all the people of the United States, without discrimination on the basis of race, color, religion, national origin, or sex" are able to access "adequate facilities at reasonable charges."[1] Unfortunately, the Commission's current proposals concerning the Lifeline program fail to acknowledge the reality that so many people in the United States face, which is the struggle to consistently afford access to reliable communications services. Instead of spending time

[1] 47 U.S.C. § 151.

conducting a deep analysis about why the Lifeline program remains undersubscribed and identifying ways to improve outreach and enrollment in an era of inflation and deepening income inequality, the Commission is focused on whittling away program participation by weaponizing the narrative of "waste, fraud, and abuse" and increasing surveillance. If approved, the proposals before the Commission will create even more dire connectivity circumstances for low-income consumers.

As advocates for digital inclusion, we cannot ignore the disproportionate harm being experienced by certain communities in this nation currently, including low-income communities, immigrant communities, and communities of color, and we certainly cannot dismiss the political forces that are fueling said harm. This proceeding appears to be, as the Joint Commenters previously stated, an attempt to "get points on an invisible scoreboard."[2] If successful, this effort would harm not only eligible Lifeline participants but also all users of broadband networks, as it would weaken network effects due to less people being online, and it would decrease the economic and societal benefits that can result from widespread broadband adoption.

II. The Lifeline Benefit Must be Properly Modernized to Meet Modern-Day Affordability Needs

The Commission is charged with ensuring communications services are available to every person in the United States. Unfortunately, the current structure of the Lifeline program is failing to meet this mandate. The record clearly demonstrates that the $9.25 monthly discount does not align with the cost of connectivity and the rising cost of living. To properly address this moment, the Commission must work *in good faith* with Congress to strengthen a modernized

[2] Comments of Public Knowledge, National Digital Inclusion Alliance, National Hispanic Media Coalition, Open Technology Institute at New America, Multicultural Media, Telecom and Internet Council, American Civil Liberties Union, Asian Americans Advancing Justice|AAJC, Everyone On, Massachusetts Digital Equity Coalition, and NTEN in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page 14.

Lifeline program to ensure that no household is left behind in the digital age. A recent report published by Public Knowledge, UnidosUS, and the National Digital Inclusion Alliance, *The Blueprint for Equitable Digital Participation*, outlines how affordability consistently emerged as a significant and ongoing challenge to broadband adoption across all communities where focus groups took place, including Colorado, Georgia, New Mexico, and Ohio.[3] Additionally, the survey results in this report found that when participants were asked about "difficulty affording high-speed internet over the past six months, 55% of respondents indicated challenges 'sometimes' or 'very often,' with those living in poverty experiencing significantly greater hardship." [4]

The Joint Commenters agree with the Benton Institute for Broadband & Society, which argues that, "the Commission should reevaluate whether the $9.25 monthly discount for broadband that meets minimum standards is sufficient, especially for fixed broadband service."[5] A communications benefit created more than forty years ago, in a different market landscape that has never been adjusted for inflation, cannot be expected to deliver meaningful access today, particularly as broadband becomes even more critical to every part of our lives. The internet is the great opportunity-maker of our time because it reduces barriers that are typically created by time and distance, which makes it easier for people to access educational opportunities, engage in civic life, connect to healthcare services, pursue new economic opportunities, and maintain relationships with their family and friends. And yet, with just one monthly benefit option at $9.25, households must choose between mobile and fixed broadband, and do not have the opportunity to realize the full benefits the internet offers. It is because of this, that the Joint

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[3]Alisa Valentin and Claudia Ruiz, (May 2026), *The Blueprint for Equitable Digital Participation*, Public Knowledge, UnidosUS, National Digital Inclusion Alliance, https://publicknowledge.org/policy/the-blueprint-for-equitable-digital-participation/.

[4] *Id* at page 52.

[5] Comments of the Benton Institute for Broadband & Society in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page 16.

Commenters agree with NCLC's position that low-income consumers should have access to robust, affordable, and *competitive* broadband internet services.[6]

The experience with the Affordable Connectivity Program (ACP) supports a long-held hypothesis among advocates: the subsidy amount directly impacts the program's efficiency and efficacy. The Joint Commenters agree with the National Urban League and civil rights organizations who noted that the ACP's higher benefit, which is more aligned with actual market prices, "significantly increased adoption and participation."[7] This demonstrates that providing adequate financial support, rather than imposing additional verification requirements, is the most effective way to drive connectivity. In other words, when the government acknowledges an actual problem and responds with a proper and proportionate intervention, such as a meaningful connectivity subsidy that effectively offsets costs alongside low barriers to entry, low-income households are more likely to connect, and providers are more likely to participate.

Affordable broadband access also advances consumer welfare and economic growth for families and the nation. As CTIA noted, "Lifeline boosts demand for high-speed broadband infrastructure and advances the goal of looking out for the American worker, including those that are in periods of transition."[8] The Joint Commenters agree with CTIA in their assessment of the necessity of the Lifeline program and its role in helping workers in the United States get and stay connected.

[6] Comments of National Consumer Law Center, Common Sense Media, Communications Workers of America, Leadership Conference on Civil and Human Rights, MediaJustice, UnidosUS, United Church of Christ Media Justice Ministry in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page 12.
[7] Comments of National Urban League, National Council of Negro Women, Multicultural Media, Telecom, and Internet Council, Leadership Conference on Civil and Human Rights, OCA- Asian Pacific American Advocates, Media Access Project, in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page 12.
[8] Comments of CTIA in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page 3.

III. Expanded Verification Requirements Will Increase Provider and Agency Costs and Reduce Consumer Participation

The Commission's proposals regarding citizenship verification and collection of full nine-digit Social Security numbers risks increasing costs for providers, applicants, and the agency itself, which can undermine the Commission's stated goal of reducing waste, fraud, and abuse. The record clearly demonstrates that the Commission is unlikely to achieve improved program integrity if it takes these steps. Unfortunately, this Commission appears less concerned with evidence-based policy implementation and more focused on advancing a political agenda that treats low-income households as targets of suspicion, rather than people deserving of critical public investments. This is not government efficiency. This is a proposal to create administrative burdens that will harm tax-paying vulnerable populations, while offering little to no benefit to program integrity.

We specifically urge the Commission to give thorough and deliberate consideration to the impacts on vulnerable groups, including older adults. As AARP plainly states, "efforts to strengthen program integrity must not compromise the privacy of eligible customers or create barriers to access – particularly for older adults."[9] Similarly, the National Urban League et al. states, "Data breaches involving SSNs have affected millions of Americans in recent years, with severe consequences for low-income individuals and seniors who often lack the resources to mitigate identity theft."[10] We also agree with Free Press' statement that the Commission "completely ignored, and failed to seek comment on, the potential costs of collecting this information – especially costs to applicants whose lives could be ruined by now all-too-common

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[9] Comments of AARP in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page 4.

[10] Comments of National Urban League in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page. 6.

hacks and breaches of centralized databases."[11] In 2024 alone, adults in America lost $47 billion to identify fraud and scams.[12] This type of data makes consumers rightfully skeptical about sensitive information they are willing to provide, including to the government. As Free Press outlines, this nine-digit SSN collection proposal also "stands in stark contrast to the clear bipartisan intent of Congress to have government agencies reduce their flippant and unnecessary over-collection of PII."[13] As they detailed, from the 2007 Bush Administration to 2017 congressional hearings, Republicans in particular have been vocal about the urgent need to both eliminate unnecessary collection and use of Social Security numbers. [14]

To be clear, the costs are not just experienced by eligible Lifeline consumers, costs will also extend to providers and the federal government. As WTA-The Rural Broadband Advocates explained, requiring Lifeline providers to collect full Social Security numbers would impose significant compliance and security costs to secure and retain highly sensitive personal information.[15] Similarly, the proposal to incorporate citizenship verification through the Department of Homeland Security SAVE system would be a costly layer of bureaucracy and likely inaccurate.[16] As NCLC notes, citizenship determinations are already made through other federal benefits programs.[17] It is also wasteful to "[add] the use of the SAVE system as an additional step would also add unnecessary expense," as NCLC highlights.[18] More specifically, "the cost per transaction in FY 2026 is $3.10 per verification for federal agencies and a $25.00

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[11] Comments of Free Press in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page 8.
[12] Javelin Strategy & Research, (March 2025), "2025 Identity Fraud Study: Breaking Barriers to Innovation," https://javelinstrategy.com/research/2025-identity-fraud-study-breaking-barriers-innovation.
[13] Comments of Free Press (May 4, 2026) at page 8.
[14] Comments of Free Press (May 4, 2026) page 8.
[15] Comments of WTA-Advocates for Rural Broadband in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page 2.
[16] Comments of National Consumer Law Center, et al. (May 4, 2026) at page 7.
[17] *Id* at page 8.
[18] *Id* at page 8.

monthly service charge for each month an agency submits at least one SAVE case."[19] This would be an additional cost per applicant the Commission would be forced to incur that it does not currently expend, which would force the Commission to expend limited funds on administration instead of ensuring universal connectivity.

Additionally, we agree with Free Press' view that "formally confirming that PRWORA applies to Lifeline – would not alter the status quo outcome, but it would frustrate the process that is needed to faithfully implement the law and achieve the Commission's and Congress's communications policy goal."[20] In short, these proposals are wasteful and this misguided approach will deliberately increase administrative burdens, discourage participation, and take resources away from the core mission of the Lifeline program.

IV. The Commission Must Act in Good Faith to Reduce Barriers to Enrollment

Like many safety-net programs, Lifeline has enrollment barriers that discourage eligible households with limited time and resources from applying and benefiting from these life transforming services. The record clearly demonstrates that applications are abandoned due to complex and time consuming processes. To ensure communication services reach every resident, the Joint Commenters urge the Commission to simplify the Lifeline enrollment process, and ensure applicants are not exposed to privacy or data risks. By decreasing administrative hurdles, the Commission can streamline the process for applicants and boost program engagement.

The Joint Commenters agree with the National Urban League et al.'s assertion that "the Commission itself has recognized that overly burdensome processes can deter participation and reduce program effectiveness,' and "proposals that require additional documentation, increase verification steps, or restrict eligibility criteria are likely to exacerbate existing participation

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[19] *Id* at page 8.
[20] Comments of Free Press (May 4, 2026) at page 10.

gaps, especially among populations that already face barriers to access."[21] As the Joint Commenters previously stated, the Commission's proposed changes, such as expanded identity verification, risk making the process even more burdensome for low-income households who already face a "time tax" of due administrative burden.[22]

The Joint Commenters support AARP in urging the Commission to "ensure that any verification process is understandable for consumers and does not expose them to unnecessary privacy or data security risks" when considering stronger safeguards, and to "prioritize approaches that clearly communicate the process and the information requested."[23] The National Consumer Law Center argues against imposing more administrative work on the part of the Lifeline consumer and the Lifeline program overall. As they argue, "a rule change that would require Lifeline subscribers to de-enroll and re-apply in order to transfer their Lifeline benefit to a new provider" would intensify the administrative load.[24]

Another barrier to completing the Lifeline enrollment process is reliable and consistent access to the internet, connected devices, and the digital skills to know how to complete each step in the Lifeline enrollment process. The secondary verification requirement incorrectly presumes that applicants possess necessary digital skills and have access to digital technologies, which ignores the fact that many Lifeline applicants are accessing the program because they need a phone or internet service, and may not have access to a device or have foundational digital skills. As the Benton Institute for Broadband and Society states, "Lifeline exists precisely to help people afford phone and internet service, yet the verification requirement assumes applicants already have a working phone number or email address. The people most likely to lack both at

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[21] Comments of National Urban League (May 4, 2026) at page 4.
[22] Comments of Public Knowledge, National Digital Inclusion Alliance, National Hispanic Media Coalition, et. al (May 4, 2026) page 21.
[23] Comments of AARP (May 4, 2026) at page 4.
[24] Comments of National Consumer Law Center, et al. (May 4, 2026) at page 12.

the moment of application are exactly the people most in need of being enrolled in the program."[25] The Joint Commenters also agree with National Consumer Law Center in their assessment that a secondary verification risks delaying, stalling, or terminating the enrollment in the Lifeline program because "at initial enrollment households may not have immediate access to a handset or a computer or digital skills to use email to perform the secondary verification. This additional process could delay access to Lifeline service."[26]

V. The Commission Should Implement Consumer Protections and Address Provider Misconduct

The Joint Commenters reiterate their previous statements that fraud and abuse narratives often place blame on consumers, even though enforcement actions show that providers are the primary entities engaging in such practices.[27] Recent enforcement actions and whistleblower complaints have shown instances of provider misconduct that have harmed Lifeline consumers both directly and indirectly, while also shaping a narrative about the program through media coverage that influences reactionary policy responses for political ends. NDIA affiliates have identified problematic activities that some Lifeline representatives have engaged in while signing up qualified individuals for Lifeline. Some Lifeline agents entice low-income customers with free cell phones as part of an introductory offer, and then fail to fully disclose and make understandable the new or increased monthly fees that Lifeline applicants may not fully understand or expect.[28] The Commission should account for these challenges and implement protections to ensure that qualified Lifeline applicants are well-informed, have choices, and can easily enroll in the program. As such, we restate our call for stricter enforcement of rules

[25] Comments of Benton Institute for Broadband and Society (May 4, 2026) at page 33.
[26] Comments of National Consumer Law Center, et al, (May 4, 2026) at page 9.
[27] Comments of Public Knowledge, National Digital Inclusion Alliance, National Hispanic Media Coalition, et al. (May 4,2026) at pages 6-9.
[28] Letter from Alisa Valentin to Marlene H. Dortch (May 21, 2026) in WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445, CG Docket No. 22-2, GN Docket No. 25-13, at page 3.

regarding provider enrollment representatives and commission-based compensation. Lastly, the Joint Commenters agree with the National Consumer Law Center et al. in their assessment that "the Bureau should seek public comment on compliance plans, particularly from state utility commissions and members of the National Association of State Utility Consumer Advocates," regarding specific modifications to the provider's compliance plans.[29]

VI. The Commission Must Preserve Voice-Only Services and Be More Responsive to Needs of Low-Income Households

To communicate in 2026, a person needs the ability to voice, text, and message via various digital platforms including but not limited to email on their mobile and digital devices thus requiring voice, data, SMS, and data services. As such, the Commission must preserve voice services in the Lifeline program. Forcing a household to choose between voice and data is a burden the household should not have to bear, as both are necessary. NTCA and NRECA state that "the pattern of repeated waivers demonstrates that the Commission should codify continued voice-only support rather than perpetuating regulatory uncertainty through annual extensions," and that " eliminating voice-only support would leave some of the nation's most vulnerable rural consumers with no Lifeline option at all in areas where no provider offers broadband service meeting the program's minimum service standards."[30]

As it relates to data, Benton Institute for Broadband & Society cautions against setting a "new static standard at or near the current 4.5 GB—which its waiver history suggests is the likely outcome" because "the standard will continue to fall further behind actual monthly data usage per smartphone subscriber, which was 15.5 GB in 2023. Average mobile data consumption in the United States has been growing at roughly 30-40 percent per year." The Joint Commenters

[29] Comments from National Consumer Law Center, et al (May 4, 2026) pages 15-17.

[30] Comments from NTCA-The Rural Broadband Association and the National Rural Electric Cooperative Association in WC Docket No. 11-42, WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445 (May 4, 2026) at page 7.

agree with the Benton Institute for Broadband & Society that the standard must meet the needs of the users and that "a static 4.5 GB standard that was already modest in 2020 becomes increasingly inadequate as a meaningful internet access standard over time, potentially making Lifeline service so limited relative to actual needs that subscribers choose to go without rather than maintain enrollment for a benefit that no longer covers their basic usage."[31]

Lastly, there is broad agreement in the record of the potential risks associated with changes from one-per-household to one-per-residence. As the Joint Commenters previously stated, "we urge the Commission to refrain from adopting the one-per-residence proposal because it will likely impact multigenerational households and individuals relying on shelters and other social service groups for stable housing and support."[32] This is yet another "structurally significant change that could disproportionately affect the most vulnerable Lifeline subscribers."[33] Moreover, the Joint Commenters agree with Benton's argument that this proposed change is not in line with Administrative Procedure Act, which requires agencies to provide a reasoned basis for proposed rules and "[this] rule change that could displace tens or hundreds of thousands of eligible subscribers without a prior enrollment impact analysis is a meaningful procedural gap."[34]

VII. Conclusion

As outlined in these replies and our initial comments, Public Knowledge and the National Digital Inclusion Alliance strongly urge the Commission to center the needs of low-income consumers who rely on Lifeline to get and remain connected to communications services. The

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[31] Comments of Benton Institute for Broadband & Society, page 39.
[32] Letter from Alisa Valentin to Marlene H. Dortch (May 21, 2026) in WC Docket No. 17-287, WC Docket No. 09-197, WC Docket No. 21-450, WC Docket No. 20-445, CG Docket No. 22-2, GN Docket No. 25-13, at page 3.
[33] *Id* at page 7.
[34] *Id* at page 7.

Commission should not move forward with proposals that will create additional and far more expensive barriers to participation in the digital age.

Respectfully Submitted,

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