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By ECFS

Marlene Dortch, Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: **Notice of Oral *Ex Parte* Presentation, WC Docket Nos. 11-42, 20-445**

Dear Ms. Dortch:

On Monday, October 4, 2021, the undersigned counsel on behalf of the National Lifeline Association (NaLA) met (via phone) with Trent Harkrader and Ramesh Nagarajan from the Office of Acting Chairwoman Rosenworcel to discuss the Lifeline Program and the Emergency Broadband Benefit (EBB) Program. Our discussion focused on the Lifeline minimum service standards (MSS), getting the Lifeline program ready for the end of the EBB and certain Lifeline and EBB process improvements that should be made by the Universal Service Administrative Company (USAC), consistent with the enclosed summary (Exhibit A).

The Commission Must Take Swift Action on the Lifeline MSS

First, we discussed the looming December 1, 2021 deadline for another dramatic increase in the mobile broadband MSS. In her dissent to the 2019 MSS Waiver Order, then Commissioner Rosenworcel called a pause at 2 GB a "smart approach" because another arbitrary increase would do "nothing to provide the certainty we need for this program."[1] She went on to correctly foresee that "without pausing for review, the FCC will simply be back in the same place, wrestling with the same issues, and more of the same scheduled service adjustments at this time next year."[2] She was right. Unfortunately, the Commission's majority did not listen to then Commissioner Rosenworcel and instead increased the mobile broadband MSS in 2019 to 3 GB, and then the Wireline Competition Bureau (Bureau) did the same thing in 2020 by increasing the MSS again to 4.5 GB.[3] Each year, Lifeline households and ETCs face a massive

[1] *Lifeline and Link Up Reform and Modernization et. al.*, WC Docket No. 11-42 et al., Order, FCC 19-116, Statement of Commissioner Jessica Rosenworcel Dissenting (2019) (2019 MSS Waiver Order).

[2] *Id*.

[3] *See Lifeline and Link Up Reform and Modernization et. al.*, WC Docket No. 11-42 et al., Order, DA 20-1358 (WCB 2020) (2020 MSS Waiver Order).

exponential increase in the MSS pursuant to the broken formula in the rules and each year the Commission (or the Bureau) has decided to impose a smaller increase with no analysis or determination that it was affordable for low-income consumers when the reimbursement amount has not increased since 2012. We are back in the same place again in 2021 with an increase in the mobile broadband MSS from 4.5 GB to 18 GB scheduled to take effect on December 1, 2021.[4] Acting Chairwoman Rosenworcel's view that pausing the mobile broadband MSS would be a "smart approach" is as true today as it was in 2019. However, the Commission also needs to address the petitions for reconsideration of the 2016 Lifeline Modernization Order's mobile broadband MSS formula that have been pending for five years.

Further, the Commission should waive the reimbursement reductions in Section 54.403(a)(2) of its rules to restore the Lifeline voice reimbursement to $9.25 per month for which many Lifeline providers will offer unlimited or the equivalent of unlimited voice minutes (e.g., 3,000) to eligible low-income households. The public interest in this instance is clear. The comments on the NASUCA Petition for Reconsideration refresh Public Notice were once again unanimous in favor of retaining Lifeline support for voice services for the same reasons that have been provided to the Commission since 2016.[5] The commenters on the State of the Lifeline Marketplace Public Notice earlier this year unanimously supported retaining or reinstating full Lifeline support for voice service and no stakeholder argued for its phase out.[6] Most importantly, approximately 625,000 Lifeline voice subscribers will lose their service as of December 1, 2021 if not before.[7] The Lifeline eligible telecommunications carriers (ETCs) serving those 625,000 Lifeline subscribers will be making decisions **this month** regarding the need to provide notices and terminate service in November, especially since it is not clear that those ETCs would receive reimbursement for Lifeline voice service provided in November with a December 1, 2021 snapshot date.[8]

The Commission could also address these MSS issues more permanently by taking action on the NaLA Petition for Rulemaking filed on April 19, 2021.[9] In the meeting, we urged that the Commission or

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[4] *See Wireline Competition Bureau Announces Updated Lifeline Minimum Service Standards and Indexed Budget Amount*, WC Docket No. 11-42, Public Notice, DA 21-930 (July 30, 2021).

[5] *See, e.g.*, Reply Comments of CTIA, WC Docket No. 11-42, 2 (Aug. 17, 2021) ("Commenters, including advocates for low-income consumers and industry representatives alike, stand united in urging the Commission to continue to provide Lifeline support for voice services, including mobile wireless voice services.").

[6] *See* Reply Comments of the National Lifeline Association, WC Docket No. 11-42, 14-16 (May 4, 2021).

[7] USAC reports that as of May 2021, 9 percent of Lifeline subscribers still received voice-only or bundled service with the reimbursement based on the voice service. At 6.95 million Lifeline subscribers, that is approximately 625,000 Lifeline voice subscribers that will lose support as of December 1, 2021.

[8] Section 54.403(a)(2)(iv) states "On December 1, 2021, standalone voice service, or voice service not bundled with broadband which meets the minimum standards set forth in 54.408, will not be eligible for Lifeline support unless the Commission has previously determined otherwise." 47 C.F.R. § 54.403(a)(2)(iv).

[9] *See* National Lifeline Association Petition for Rulemaking, RM-_____ (Apr. 19, 2021) (Petition for Rulemaking).

Bureau expeditiously release a Public Notice seeking comment on the Petition for Rulemaking so that others can comment on it and the Commission can build a record to take the necessary actions to transition the Lifeline program into a program that is post-EBB ready. We explained in the meeting that the Commission should not work in a linear fashion, but rather consider important improvements to the Lifeline program now so that those improvements can be in place when the EBB funding runs out.

In the meeting, we presented the results of **NaLA's Summer 2021 Mobile Voice and Broadband Retail Price Survey**, which shows that unlimited monthly data plans generally are priced between $40 and $65 or more, 18 GB monthly data plans are generally priced between $40 and $60 (carriers often have a 15 GB plan and then move to unlimited) and 4.5 GB monthly plans are generally priced between $25 and $35.[10] The survey also shows that unlimited voice is generally priced around $15 per month at retail.[11] Therefore, there is no justification for increasing the mobile broadband MSS without substantially increasing the Lifeline reimbursement amount. Further, if the Commission were to reinstate a reimbursement of $9.25 per month for voice, the reimbursement would still be well under the prevailing retail price for unlimited voice.

We also presented the results of the **Summer 2021 NaLA Lifeline and EBB Subscriber Survey**. That survey shows, among other things, that while Lifeline and EBB subscribers want 1,000 or more minutes of voice and 20 GB or more of data, they cannot afford to pay for it.[12] In response to the survey approximately 75 percent of respondents said they need 1,000 minutes or more each month[13] and 44 percent of respondents said they need 20 GB of data or more each month.[14] However, 68 percent said they could not afford to make monthly payments for Lifeline service,[15] nearly 60 percent do not have a checking or savings account[16] and more than half do not have a debit or credit card.[17] Therefore, the EBB and/or Lifeline program must provide reimbursements sufficient to keep robust voice and data services free for low-income households.

The Commission Should Focus on Lifeline and EBB Process Improvements

In the meeting, we also discussed NaLA's requests for Lifeline and EBB process improvements that will improve the enrollment experience and remove unnecessary barriers to EBB program participation for

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[10] *See* Exhibit B.

[11] *See id*.

[12] *See* Exhibit C.

[13] *See id*., Slide 4.

[14] *See id*., Slide 5. Many respondents were not sure how much data they needed, but the 20 GB or more response was by far the largest.

[15] *See id*., Slide 9.

[16] *See id*., Slide 10.

[17] *See id*., Slide 11.

eligible consumers. The Commission and USAC have already made progress on certain improvements, which is appreciated, but further improvements are necessary. First, Lifeline subscribers in the three National Lifeline Accountability Database (NLAD) opt-out states face unfair and prejudicial delay in being able to opt-in to the EBB. This is because the Bureau has refused to approve any Alternative Verification Process (AVP) that would allow Lifeline ETCs to rely on the opt-out state administrators' Lifeline eligibility approvals (with proof of those approvals sent as back-up to USAC in daily files) and USAC has declined to accept real-time API access to the California state administrator database of eligible LifeLine subscribers or daily transmission of the eligibility information directly from the opt-out state administrators. We explained that EBB providers and consumers appreciate that USAC is accepting state administrator eligibility information weekly as of last week, but this still leaves consumers in NLAD opt-out states waiting for up to 10 days to be able to opt-in to the EBB – something consumers in other states can do immediately upon enrollment in Lifeline. The Commission should direct USAC to accept real-time API access to state administrator Lifeline eligibility determinations to remove this artificial impediment to EBB enrollment facing low-income consumers in California, Oregon and Texas.

Second, we noted our appreciation for the Commission and USAC recently launching a service provider EBB application programming interface (API), but the EBBP Order also directed USAC to make available a National Verifier service provider portal with document transmission functionality.[18] The API with document transmission functionality will remove unnecessary barriers to program participation by eligible consumers currently enrolled in Lifeline who cannot be verified electronically through the National Verifier by allowing service providers to assist consumers with the identification and submission of valid documents. The Commission and USAC should prioritize this functionality and provide a transparent timeline for testing and completion.

Third, we urged that the Commission direct USAC to provide more transparency to service providers and the public regarding the EBB Program's performance. We have included several examples for additional data points that should be added to the EBB dashboard in the enclosed summary, including wait times for manual reviews and approved AVPs by provider. We also stated that we would list additional National Verifier and NLAD performance issues with this submission, which are included in the enclosed summary. We look forward to continuing to work cooperatively with the Commission and USAC to improve the Lifeline and EBB enrollment experience for low-income consumers.

The Commission and USAC Should Work With Providers to Resolve Apparent EBB Benefit Transfer Misuse

ACA Connects recently identified apparent misuse of the EBB benefit transfer process that some of its members' customers have experienced.[19] NaLA's members and their customers have experienced

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[18] *See Emergency Broadband Benefit Program*, WC Docket No. 20-445, Report and Order, FCC 21-29, ¶ 49 (rel. Feb. 26, 2021) (EBBP Order).

[19] *See* ACA Connects Notice of Ex Parte Presentation, WC Docket No. 20-445 (Sept. 27, 2021).

similar situations where customers appear to have been transferred to another EBB provider without the customer's knowledge. There may be some situations where a customer's Lifeline and/or EBB service is transferred pursuant to consent previously provided without any violation of the Commission's rules, but it also seems apparent that some Commission guidance would be useful. For example, the Commission could plainly state that a Lifeline or EBB applicant's consent for enrollment or a benefit transfer is for one-time use and cannot be "used" again to transfer the customer back after that customer has transferred his or her benefit to another provider. Because there may be contributing factors not known or understood, this benefit transfer controversy would also be an excellent topic for an EBB stakeholder roundtable discussion and could benefit from increased EBB program transparency (e.g., numbers of benefit transfers by provider). Moreover, while NaLA believes there is merit in ACA Connects' proposal to transition from a monthly snapshot to a weighted average reimbursement method, a much simpler and more practical solution would be a 30-day benefit transfer integrity check whereby Lifeline and EBB applicants would agree to remain with their chosen provider for no less than 30 days, subject to exceptions for moves outside of service area. At the end of 30 days, Lifeline and/or EBB subscribers would be free to transfer their benefit for any reason. A similar program integrity measure was incorporated into NLAD at its inception and later removed with little perceived benefit to consumers or service providers.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.[20]

Respectfully submitted,

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Enclosure

cc: Trent Harkrader
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[20] 47 C.F.R. § 1.1206(b).

EXHIBIT A

Lifeline Minimum Service Standards (MSS)

- **Pause and Reform the Mobile Broadband MSS**. The Commission's default policy of annually increasing the mobile broadband MSS by 50 percent by waiver with no affordability analysis should cease and give way to a more rational outcome of holding the MSS steady until it acts on the long-pending petitions for reconsideration and eliminates the mobile broadband MSS or revises the rule to take affordability into account.
    - On July 30, 2021, the WCB announced that **the mobile broadband MSS as of December 1, 2021 will be 18 GB**. The Commission and Lifeline stakeholders alike know that the mobile broadband **MSS formula is broken** and has been in need of reform since 2019, if not before. For the last two years, the Commission has waived the scheduled increases in favor of arbitrary smaller increases.
    - In her dissent to the 2019 Waiver Order, then Commissioner Rosenworcel called a **pause** at 2 GB a "smart approach" because another arbitrary increase would do "nothing to provide the certainty we need for this program." She went on to correctly foresee that "**without pausing for review, the FCC will simply be back in the same place, wrestling with the same issues, and more of the same scheduled service adjustments at this time next year**."
- **Reinstate Full Voice Support**. The Commission should waive the reimbursement reductions in Section 54.403(a)(2) of its rules to restore the Lifeline voice reimbursement to $9.25 per month for which many Lifeline providers will offer unlimited or the equivalent of unlimited voice minutes (e.g., 3,000) to eligible low-income households.
    - Acting Chairwoman Rosenworcel said it best – "We've become a nation that calls like never before…We are craving a human voice." Celia Kang, The Humble Phone Call Has Made a Comeback (April 9, 2020), https://www.nytimes.com/2020/04/09/technology/phone-calls-voice-virus.html.
    - USAC reports that as of May 2021, 9 percent of Lifeline subscribers still received voice-only or bundled service with the reimbursement based on the voice service. At 6.95 million Lifeline subscribers, that is **approximately 625,000 Lifeline voice subscribers that will lose support as of December 1, 2021**.
    - The comments on the NASUCA Petition for Reconsideration refresh Public Notice are once again unanimous in favor of retaining Lifeline support for voice services for the same reasons that have been provided to the Commission since 2016. The commenters on the State of the Lifeline Marketplace Public Notice earlier this year unanimously supported retaining or reinstating full Lifeline support for voice service and no stakeholder argued for its phase out.
    - In proceedings since 2016, the support for retaining Lifeline support for voice service has been nearly unanimous. The backers include AARP, NAACP, several major cities, the Oklahoma, Pennsylvania, Michigan, Minnesota, Missouri, Nebraska, Florida and California public service commissions, GVNW Consulting, NASUCA, NARUC, Sacred Wind, General Communication, Inc., NTCA and WTA, the Leadership Conference on Civil and Human Rights,

Q Link and TracFone, in addition to the Free State Foundation and the 2019 petitioners to pause the minimum service standards – CTIA, the National Consumer Law Center, National Hispanic Media Coalition, OCA –The Asian Pacific American Advocates, and United Church of Christ, OC, Inc.

Lifeline and EBB Process Improvements

The Commission and USAC have adopted the Emergency Broadband Benefit (EBB) Program rules and implemented the EBB Program in record time, in large part because of the ability to leverage the rules, processes and databases from the Lifeline Program, which serves the same low-income community. *The FCC and USAC now must take additional steps to improve the enrollment experience for eligible consumers and to remove unnecessary barriers to EBB program participation by eligible consumers.*

- **Connect Via API to NLAD State Opt-Out Administrators or Accept Lifeline Enrollment Information Daily.** Lifeline subscribers in the three NLAD opt-out states face unfair and prejudicial delay in being able to opt-in to the EBB. This is because the Bureau has refused to approve an Alternative Verification Process (AVP) that would allow ETCs to rely on the opt-out state administrators' Lifeline eligibility approvals (with proof of those approvals sent as back-up to USAC in daily files) and USAC has declined to accept daily transmission of the same information directly from the opt-out state administrators. In addition, the California TPA offered USAC real-time API access to its database of eligible LifeLine subscribers and USAC has declined that offer. As a result of this impasse, consumers in California, Oregon and Texas often have to wait weeks to opt-in to EBB. *The Bureau should instruct USAC to accept real-time API access to the state administrators, or accept daily files from either an ETC or the state administrator, or the Bureau should approve an AVP, so that this artificial impediment to EBB enrollment in California, Oregon and Texas can be removed.*
- **Improve the EBB National Verifier API for Service Providers by Providing API Document Transmission Functionality**. In the EBBP Order, the Commission directed USAC to make available a service provider portal for the National Verifier with a service provider API that features document transmission functionality. NaLA understands and appreciates that the Commission and USAC are working on that functionality, but six months after program launch it still is not available. The API with document transmission functionality will remove unnecessary barriers to program participation by eligible consumers currently enrolled in Lifeline who cannot be verified electronically through the National Verifier by allowing service providers to assist consumers with the identification and submission of valid documents. This should help with the manual review delays as well. *The Commission and USAC should prioritize this functionality and provide a transparent timeline for testing and completion.*
- **National Verifier and NLAD Performance Transparency.** Consumers and the tax paying public deserve to know how well the National Verifier and NLAD are performing and which service providers are serving EBB beneficiaries. The Dashboard should be updated to show:
    - current and average wait times for manual reviews;
    - percent of transactions requiring manual review;
    - percent of abandonment of manual review;
    - percent of successful electronic verification;
    - average time between an NLAD opt-out state administrator Lifeline eligibility determination and USAC updates to NLAD-EBB;

- percent of error messages on transactions;
- percent of false error messages on transactions;
- EBB enrollments by service provider in each state;
- WCB approved AVPs by provider;
- USAC approved EBB service plans by provider; and
- USAC approved EBB device offers by provider.

- **Correct Application Not Found Errors.** There appear to be consumer data matching problems between the NLAD and the National Verifier and with opt-out state administrators. EBB providers have received "application not found" errors for EBB applicants that they attempt to enroll within hours of National Verifier approval. They are also seeing the same error for subscribers that have been approved by the California TPA even after the Lifeline enrollment files have been sent to USAC and processed. *USAC should work to expeditiously resolve these errors when raised by EBB providers and work toward data matching improvements between the National Verifier, NLAD and state administrators.*
- **Correct False One Per Household (OPH) Errors.** EBB providers continue to see a significant number of OPH errors when adding EBB for an existing Lifeline subscriber during the NLAD EBB enrollment. The EBB OPH rule does not require an EBB OPH worksheet if there is a Lifeline subscriber at the address.
  - This issue was raised in a meeting on June 10, 2021 with TAPD; staff indicated it should not be happening. More than three months later, the problem remains unresolved. *USAC should resolve this problem expeditiously.*
  - **California OPH Errors**. In most states the NLAD knows if an OPH worksheet has been completed for service at an address, either for Lifeline or EBB, and the NLAD does not require another OPH worksheet for another subscriber at that address. However, in California, which has opted out of the NLAD, the NLAD does not see the OPH worksheets collected by the California TPA and therefore will unnecessarily request an OPH worksheet from the EBB applicant. The TPA has offered to provide this information to USAC, but USAC has declined to accept it because the document does not refer to the EBB. *USAC should accept this data field from the California TPA to avoid requiring unnecessary paperwork from EBB applicants and obstructing the application process.*

EXHIBIT B

NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
Affinity	$20	1 GB	1500 minutes talk, unlimited text	
	$25	1 GB	Unlimited	
	$28	2 GB	Unlimited	
	$30	3 GB	Unlimited	
	$35	5 GB	Unlimited	
	$50	15 GB	Unlimited	
	$60	Unlimited	Unlimited	
Altice Wireless	$24	1 GB	Unlimited	Mobile hotspot tethering at 600 Kbps; Optimum/ Suddenlink customers pay $10 less each month.
	$32	3 GB	Unlimited	Mobile hotspot tethering at 600 Kbps; Optimum/ Suddenlink customers pay $10 less each month
	$55	Unlimited	Unlimited	Mobile hotspot tethering at 600 Kbps; Optimum/ Suddenlink customers pay $10 less each month; unlimited plan data speeds will be reduced after 20 GB is used
AT&T	$30	5 GB	Unlimited	5 GB of high-speed data, then speeds reduced to 128 kbps
	$25	8 GB	Unlimited	$25/mo. when you pay $300 upfront Online offer, 12-month plan 8 GB of high-speed data, then speeds reduced to 128 kbps

* Information obtained from carrier websites between May 26, 2021 and June 22, 2021.
^ Unless otherwise noted, plans do not include a free handset.
[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
	$40	15 GB	Unlimited	5 GB of high-speed data, then speeds reduced to 128 kbps
	$65	Unlimited	Unlimited	$50/mo. with autopay Data speeds may be reduced to 2G speeds during network congestion
	$75	Unlimited	Unlimited	$50/mo. with autoPay and new line activation $60/mo. with autoPay in retail After 22 GB of use, speeds may be reduced to 2G speeds Includes 10 GB hotspot
Black Wireless	$20	Unlimited	Unlimited	Data 1 GB at 4G LTE 128 kbps speeds thereafter
	$30	Unlimited	Unlimited	Data 10 GB at 4G LTE 128 kbps speeds thereafter
	$40	Unlimited	Unlimited	Data 22 GB at 4G LTE 128 kbps speeds thereafter
Boost Mobile	$10	1 GB	Unlimited	Includes 1 GB Mobile Hotspot
	$15	2 GB	Unlimited	Includes Mobile Hotspot
	$25	5 GB	Unlimited	Includes Mobile Hotspot
	$35	10 GB	Unlimited	Includes Mobile Hotspot
	$50	35 GB	Unlimited	Data speeds may be reduced during network congestion Includes 12 GB hotspot

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NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
	$60	35 GB	Unlimited	Data speeds may be reduced during network congestion Includes 30 GB hotspot
Consumer Cellular	$30	3 GB	Unlimited	
	$40	10 GB	Unlimited	
	$50	15 GB	Unlimited	
	$60	Unlimited	Unlimited	After 35 GB of use, speeds may be reduced
Cricket	$30	2 GB	Unlimited	
	$40	10 GB	Unlimited	$35/mo. with autopay
	$55	Unlimited	Unlimited	$50/mo. with autopay Speeds may be reduced during network congestion
	$60	Unlimited (15 GB mobile hotspot)	Unlimited	$55/mo. with autopay Speeds may be reduced during network congestion Includes 15 GB mobile hotspot
H2O Wireless	$20	2 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps $2/mo. discount if autopay
	$30	6 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps $3/mo. discount if autopay
	$40	15 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps $4/mo. discount if autopay
	$50	Unlimited	Unlimited	After 24 GB is used, speeds reduced to 128 Kbps

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NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
				$5/mo. discount if autopay
	$60	Unlimited	Unlimited	After 30 GB is used, speeds reduced to 128 Kbps $6/mo. discount if autopay Includes hotspot (no separate data allotment)
Metro by T-Mobile	$30	2 GB	Unlimited	After monthly data allotment is used, speeds may be reduced
	$40	10 GB	Unlimited	After monthly data allotment is used, speeds may be reduced
	$50	Unlimited	Unlimited	After 35 GB of use, speeds may be reduced during network congestion Includes 5 GB hotspot and 100 GB Google one membership
	$60	Unlimited	Unlimited	After 35 GB of use, speeds may be reduced during network congestion Includes 15 GB hotspot and Amazon Prime, as well as 100 GB Google one membership
Mint Mobile	$15	4 GB	Unlimited	3 month plan – must purchase 3 months for pricing. 5G/4G LTE Data Free Mobile Hotspot

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NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
				Data speeds reduce after 4GB but data is unlimited
	$20	10 GB	Unlimited	3 month plan – must purchase 3 months for pricing. 5G/4G LTE Data Free Mobile Hotspot Data speeds reduce after 10 GB but data is unlimited
	$25	15 GB	Unlimited	3 month plan – must purchase 3 months for pricing. 5G/4G LTE Data Free Mobile Hotspot Data speeds reduce after 15 GB but data is unlimited
	$30	Unlimited	Unlimited	**3 month plan – must purchase 3 months for pricing**. 5G/4G LTE Data 5G Mobile Hotspot Data speeds reduce after 35 GB but data is unlimited
PureTalk USA	$20	2 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps
	$25	4 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps

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NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
	$30	6 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps
	$35	10 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps
	$45	20 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps
	$55	Unlimited	Unlimited	After 30 GB of use, speeds reduced
Republic Wireless	$20	1 GB	Unlimited	
	$25	2 GB	Unlimited	
	$50	7 GB	Unlimited	Build your own plan at $15 plus $5/GB Choose up to 15 GB of data per month
Simple Mobile	$25	3 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G $1.25/mo. discount if autopay
	$30	5 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G $1.50/mo. discount if autopay
	$40	15 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G $2.50/mo. discount if autopay Includes hotspot (no separate data allotment)

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[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
	$50	Unlimited	Unlimited	$5.00/mo. discount if autopay After 40 GB of use, speeds may be reduced Includes 5 GB hotspot
	$60	Unlimited	Unlimited	After 40 GB of use, speeds may be reduced $3/mo. discount if autopay Includes 15 GB hotspot
Straight Talk	$35	5 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G $1/mo. discount if autopay
	$45	25 GB	Unlimited	25 GB at high speed. After monthly data allotment is used, speeds reduced to 2G $1/mo. discount if autopay
	$55	Unlimited	Unlimited	No speed commitment. At 60 GB, they reserve the right to review account for usage in violation of Straight Talk's terms and conditions $5/mo. discount for 3 months if autopay Includes 10 GB hotspot
	$60	25 GB	Unlimited	First 25 GB at high speeds, then at 2G $1/mo. discount with autopay

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[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
	$65	Unlimited	Unlimited	Says HD video streaming Includes 20 GB hotspot At 60 GB, they reserve the right to review account for usage in violation of Straight Talk's terms and conditions $5/mo. discount with autopay
Total Wireless	$25	1 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G $1.30/mo. discount if autopay
	$35	5 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G $1.80/mo. discount if autopay Includes hotspot (no separate data allotment)
	$50	25 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G $2.50/mo. discount if autopay Includes 10 GB hotspot (counts against high-speed data allotment)
TracFone	$20	1 GB	Unlimited	$15/ mo. with auto-refill
	$25	2 GB	Unlimited	$20/mo. with auto-refill
	$30	3 GB	Unlimited	$25/mo. with auto-refill

* Information obtained from carrier websites between May 26, 2021 and June 22, 2021.

^ Unless otherwise noted, plans do not include a free handset.

[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
Ultra Mobile	$24	2 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps Includes mobile hotspot (no separate data allotment)
	$29	6 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps Includes mobile hotspot (no separate data allotment)
	$39	15 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps Includes mobile hotspot (no separate data allotment)
	$49	Unlimited	Unlimited	After 50 GB of use, speeds may be reduced
US Mobile	$12	1 GB	Unlimited	
	$15	5 GB	Unlimited	
	$20	12 GB	Unlimited	
	$25	18 GB	Unlimited	
	$30	30 GB	Unlimited	
	$45	Unlimited	Unlimited	"Unlimited All plans on GSM LTE come with 50 GB of high-speed data, and a tiny fraction of heavier data users may notice reduced speeds afterwards"
	$70	Unlimited	Unlimited	5G Nationwide 4G LTE data Disney+, discovery+, Apple Arcade, Google Play Pass, and Apple Music memberships included for 6 months

* Information obtained from carrier websites between May 26, 2021 and June 22, 2021.

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[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
Verizon	$80 (Play More Unlimited Plan)	Unlimited	Unlimited	5G total access 4G LTE data Unlimited mobile hotspot 15 GB of 5G nationwide/4G LTE data Disney+, Hulu, ESPN+, discovery+, Apple Arcade, Google Play Pass memberships included for 12 months, Apple Music for 6 months
	$80 (Do More Unlimited Plan)	Unlimited	Unlimited	5G total access 4G LTE data Unlimited mobile hotspot 15 GB of 5G nationwide/4G LTE data 600 GB of Verizon cloud storage 50% off Unlimited connected device plans Disney+, discovery+, Apple Arcade, Google Play Pass, and Apple Music memberships included for 6 months
	$90 (Get More Unlimited)	Unlimited	Unlimited	5G total access 4G LTE data

* Information obtained from carrier websites between May 26, 2021 and June 22, 2021.
^ Unless otherwise noted, plans do not include a free handset.
[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
				Unlimited mobile hotspot 30 GB of 5G nationwide/4G LTE data 600 GB of Verizon cloud storage 50% off Unlimited connected device plans Disney+, Hulu, ESPN+, and Apple Music memberships included Discovery+, Apple Arcade, and Google Play Pass memberships included for 12 months
Visible Wireless	$40	Unlimited	Unlimited	Visible only offers one plan $25/month if plan is bundled in a 'Party plan' or family plan by bringing a friend. Mobile hotspot with unlimited data at speeds up to 5 Mbps, limited to one device.
Walmart Family Mobile	$24.88	2 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G Includes mobile hotspot (no separate data allotment)
	$29.88	5 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G

* Information obtained from carrier websites between May 26, 2021 and June 22, 2021.
^ Unless otherwise noted, plans do not include a free handset.
[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
				Includes mobile hotspot (no separate data allotment)
	$39.88	14 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G Includes mobile hotspot (no separate data allotment)
	$49.88	Unlimited	Unlimited	After 40 GB of use, speeds may be reduced Includes 10 GB hotspot

* Information obtained from carrier websites between May 26, 2021 and June 22, 2021.
^ Unless otherwise noted, plans do not include a free handset.
[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Mobile Voice Retail Price Survey

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
Boost Mobile	$10	1 GB	Unlimited	Includes 1 GB Mobile Hotspot
	$15	2 GB	Unlimited	Includes Mobile Hotspot
H20 Wireless	$20	2 GB	Unlimited	After monthly data allotment is used, speeds reduced to 128 Kbps $2/mo. discount if autopay
Consumer Cellular	$25	500 MB	Unlimited	
Altice Wireless	$14	1 GB	Unlimited	Mobile hotspot tethering at 600 Kbps
Hello Mobile	$10	1 GB	Unlimited	4G LTE/5G Data Unlimited international calling to select countries 2nd month free
Metro by T-Mobile	$30	2 GB	Unlimited	After monthly data allotment is used, speeds may be reduced
Republic Wireless	$15	None	Unlimited	
StraightTalk	$30	100 MB	1500 minutes, unlimited texts	Additional 50 MB if autopay
Total Wireless	$25	1 GB	Unlimited	After monthly data allotment is used, speeds reduced to 2G $1.30/mo. discount if autopay
Ultra Mobile	$16	None	Unlimited	$2/mo. discount after the first month if autopay
Affinity	$20	1 GB	1500 minutes talk, unlimited text	
	$25	1 GB	Unlimited	

* Information obtained from carrier websites between May 26, 2021 and June 22, 2021.
^ Unless otherwise noted, plans do not include a free handset.
[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

NaLA | Summer 2021 Mobile Voice and Broadband Retail Price Survey*

Provider	**Plan(s)^**			
	Price/mo.[a]	**Data/mo.**	**Voice & Text/mo.**	**Conditions/Notes**
US Mobile	$10	None	Unlimited	
	$12	1 GB	Unlimited	
Verizon	$30.00	500 MB	Unlimited	Basic plan, talk and text only

* Information obtained from carrier websites between May 26, 2021 and June 22, 2021.
^ Unless otherwise noted, plans do not include a free handset.
[a] Unless otherwise noted, prices do not include taxes and fees, which can be substantial (e.g., $5 or more).

EXHIBIT C

National Lifeline Association

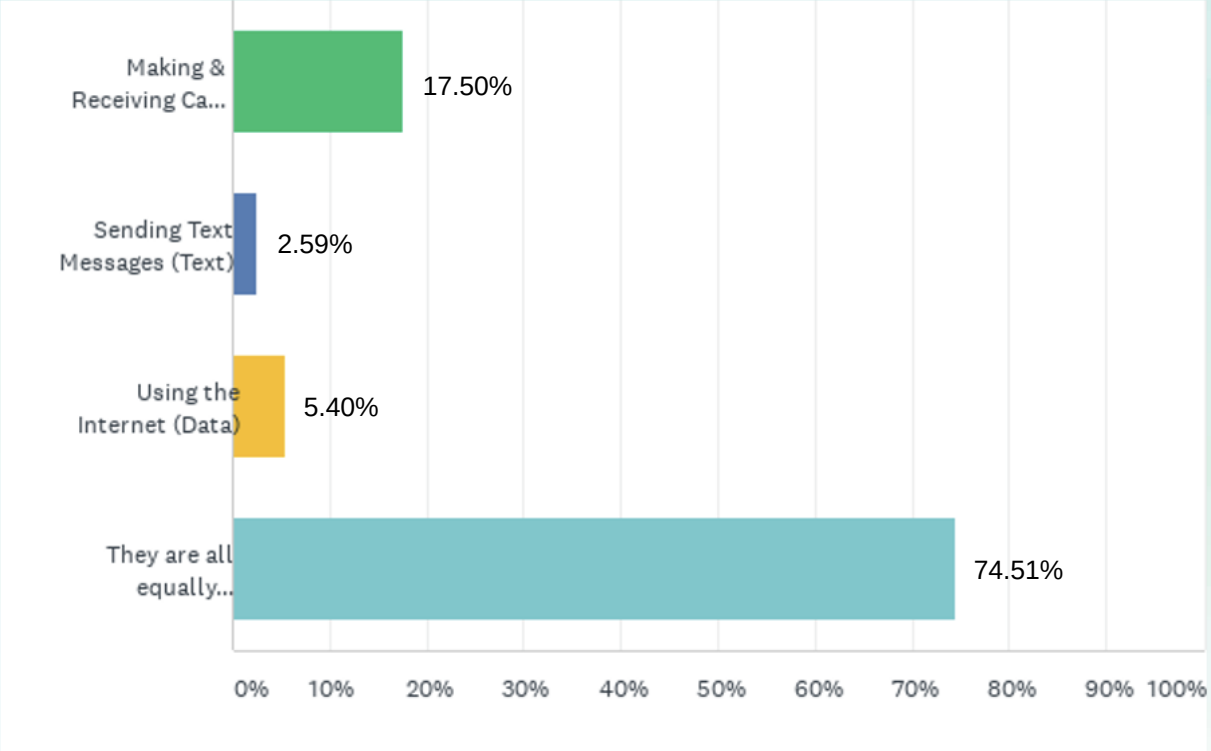
Summer 2021

NaLA Lifeline and EBB Subscriber Survey Results

National Lifeline Association

Lifeline Subscribers Prefer Bundles of Talk, Text and Data.

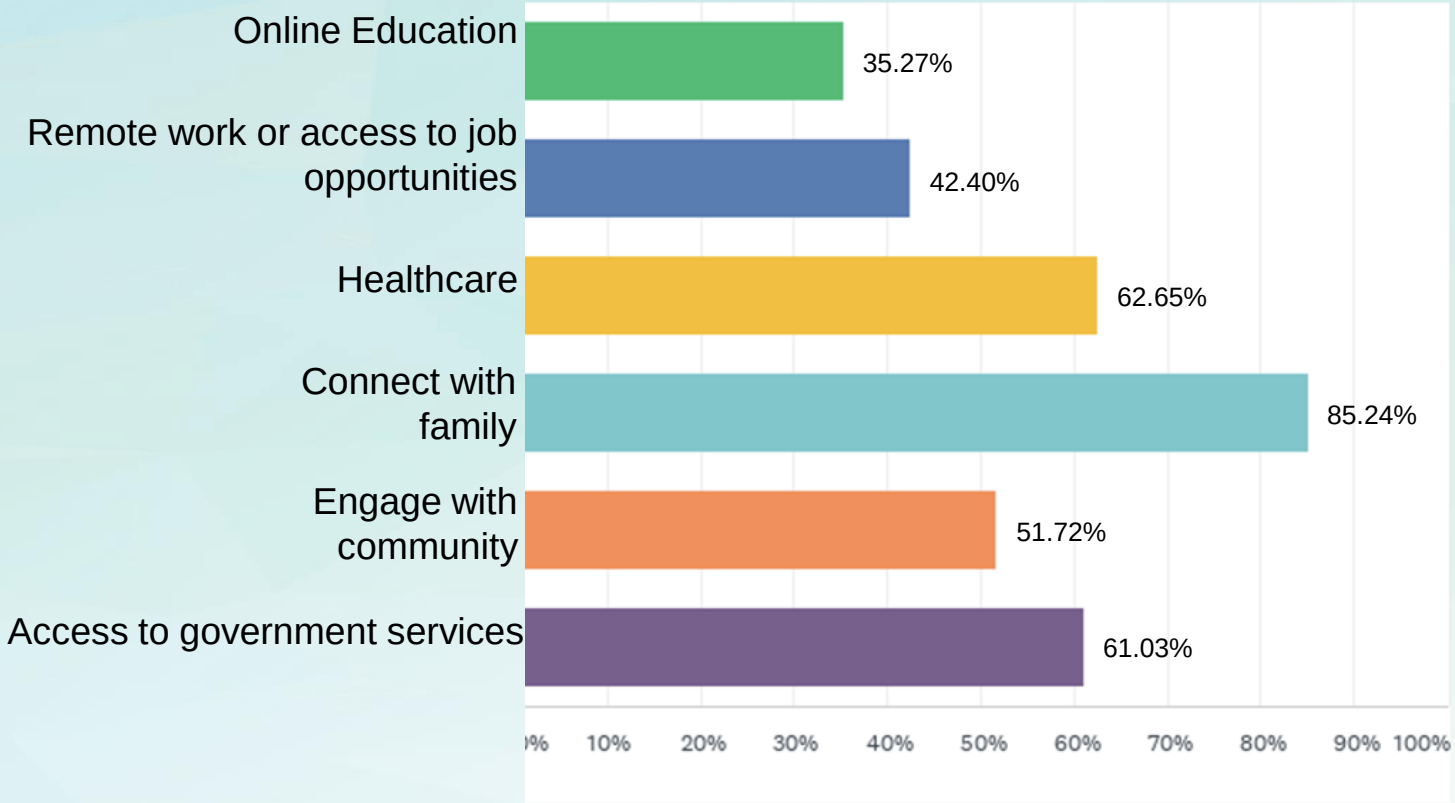
What is the single most important part of the Lifeline service you receive?



National Lifeline Association

Lifeline Subscribers Use their Service for the Expected Public Interest Purposes

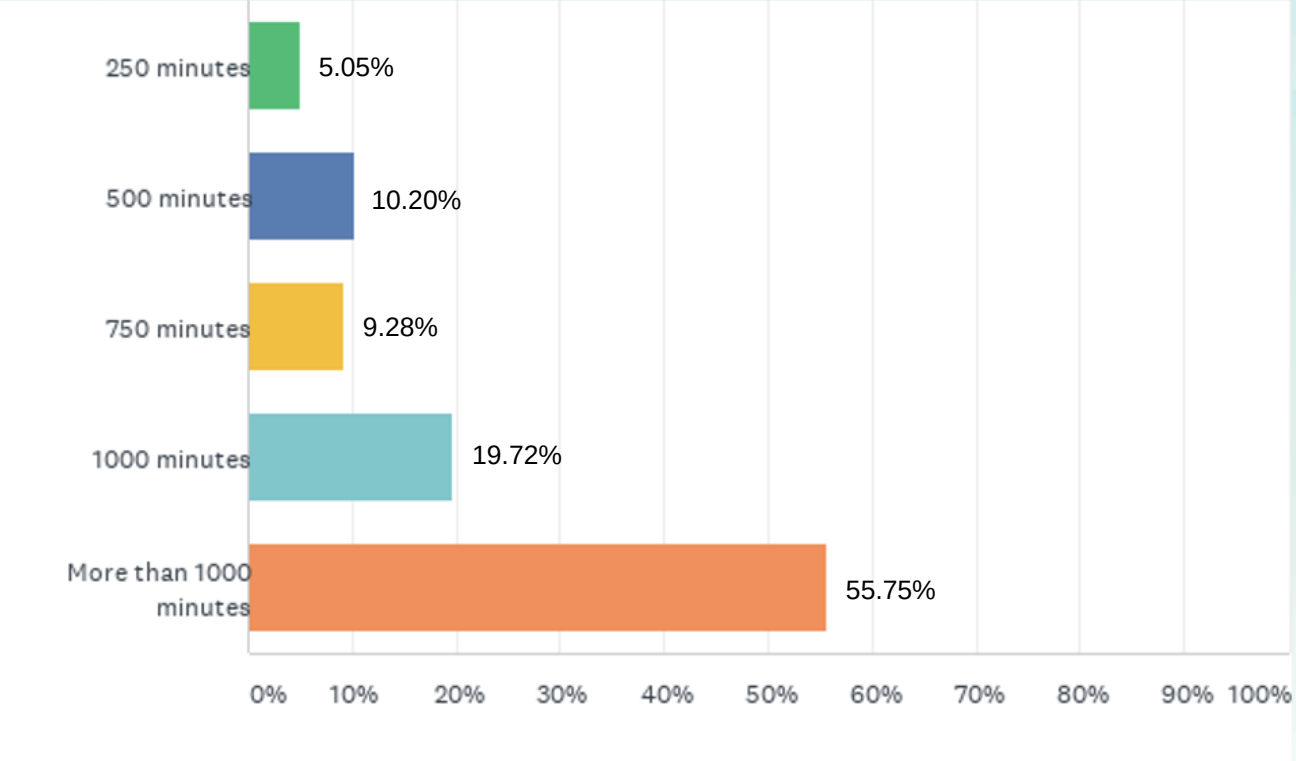
For what purposes do you and your family use your Lifeline Talk, Text, and Data services (check all that apply)?



National Lifeline Association

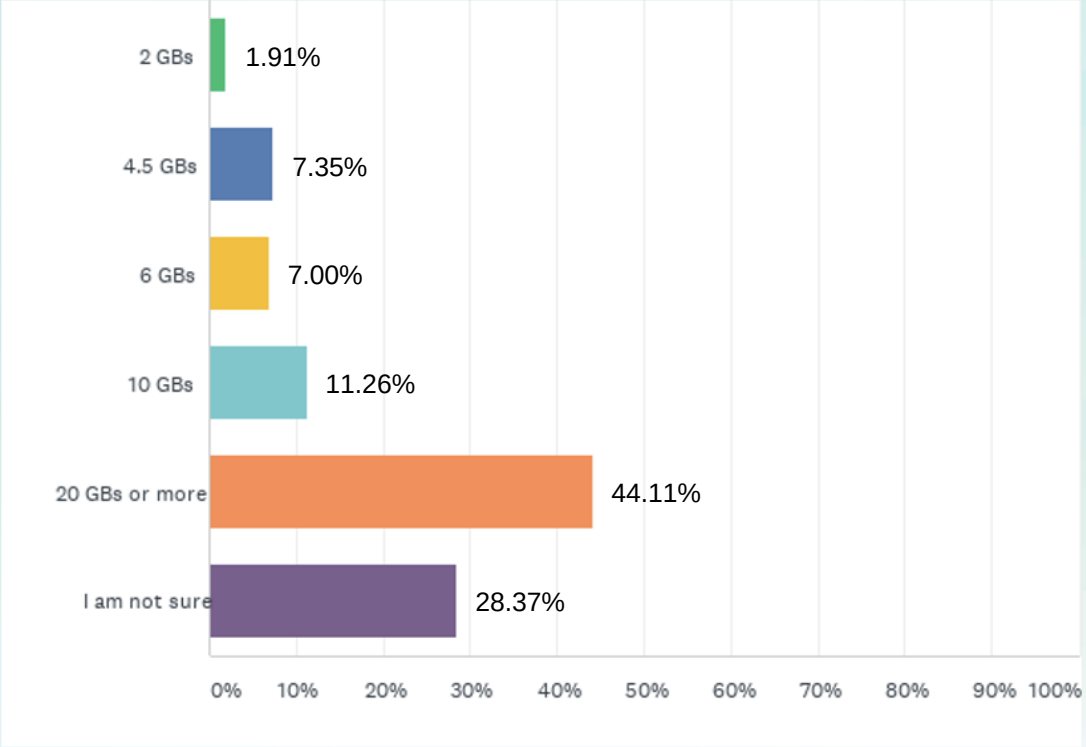
Lifeline Subscribers Say Their Families Need 1,000 Minutes or More Each Month

Which quantity of talk minutes for voice service is enough each month to ensure you and your family can make and receive calls as needed every month?



Lifeline Subscribers Say Their Families Need 20 GB of Data or More Each Month

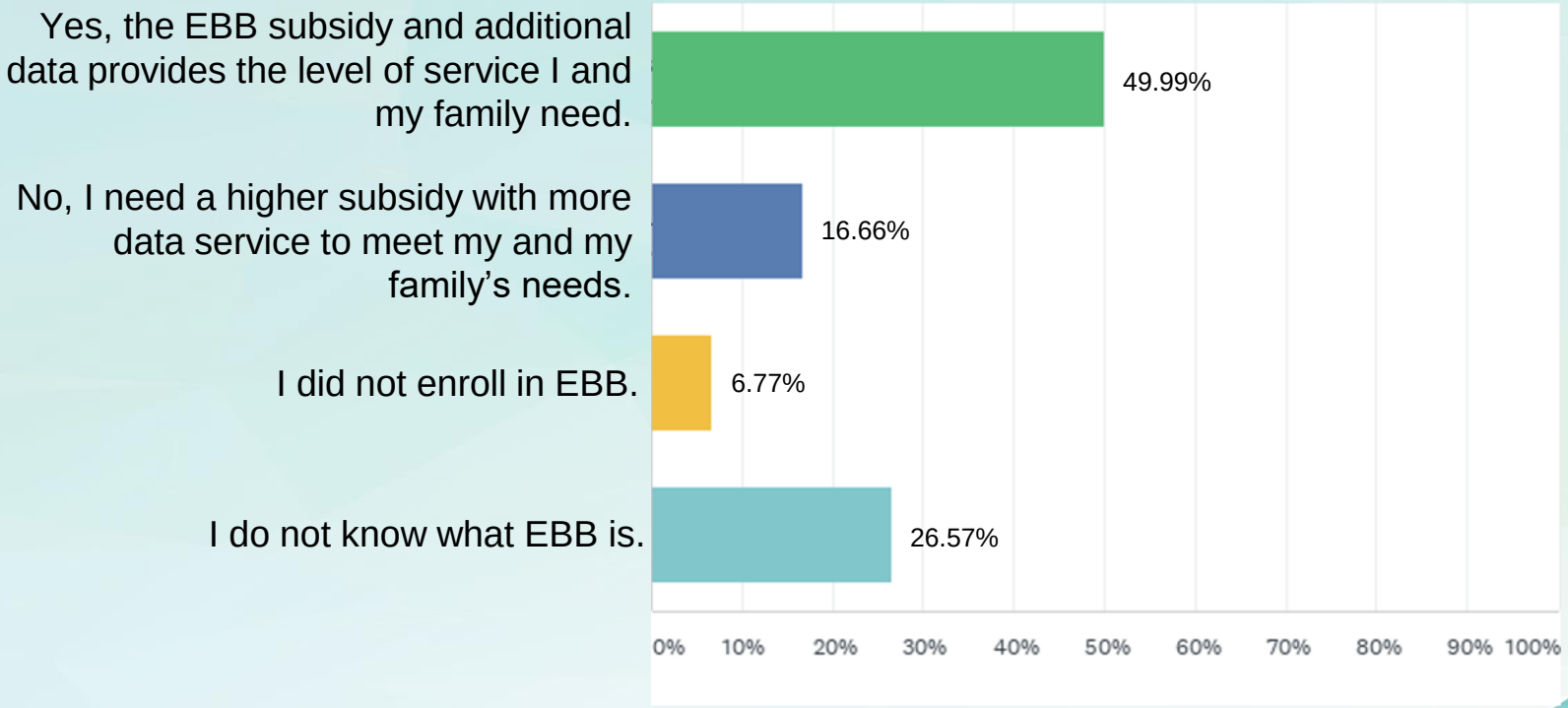
Which quantity of data for Internet service is enough each month to ensure you and your family can access online services as needed?



National Lifeline Association

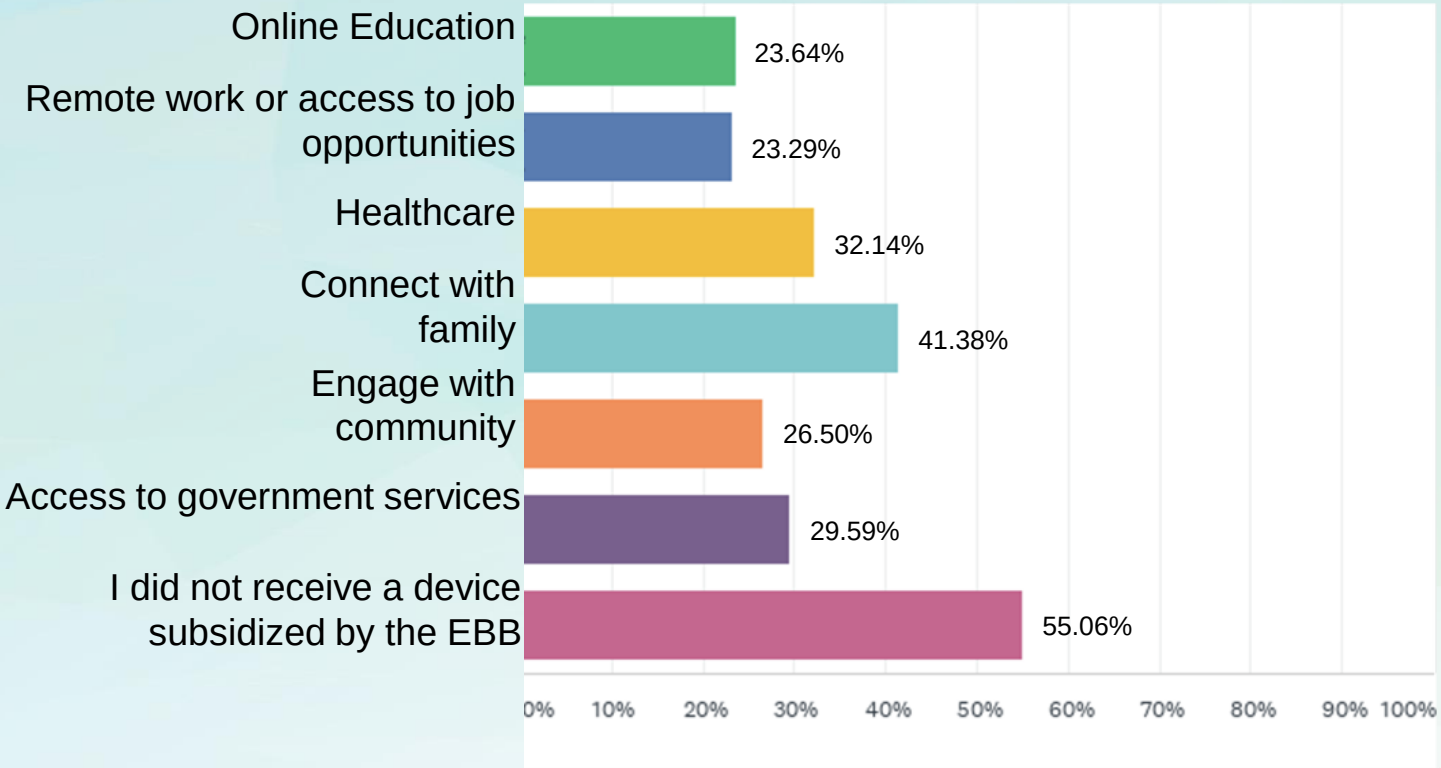
Half of EBB Subscribers Say Their EBB Service Meets Their Needs and 17% Say They Need More Data

Subscribers who enrolled in the Emergency Broadband Benefit (EBB) receive a higher subsidy, which typically allows them to access more data than what is available under their Lifeline plans.If you enrolled in the EBB, has the higher subsidy and greater amount of data provided a level of service to meet your and your family's needs?



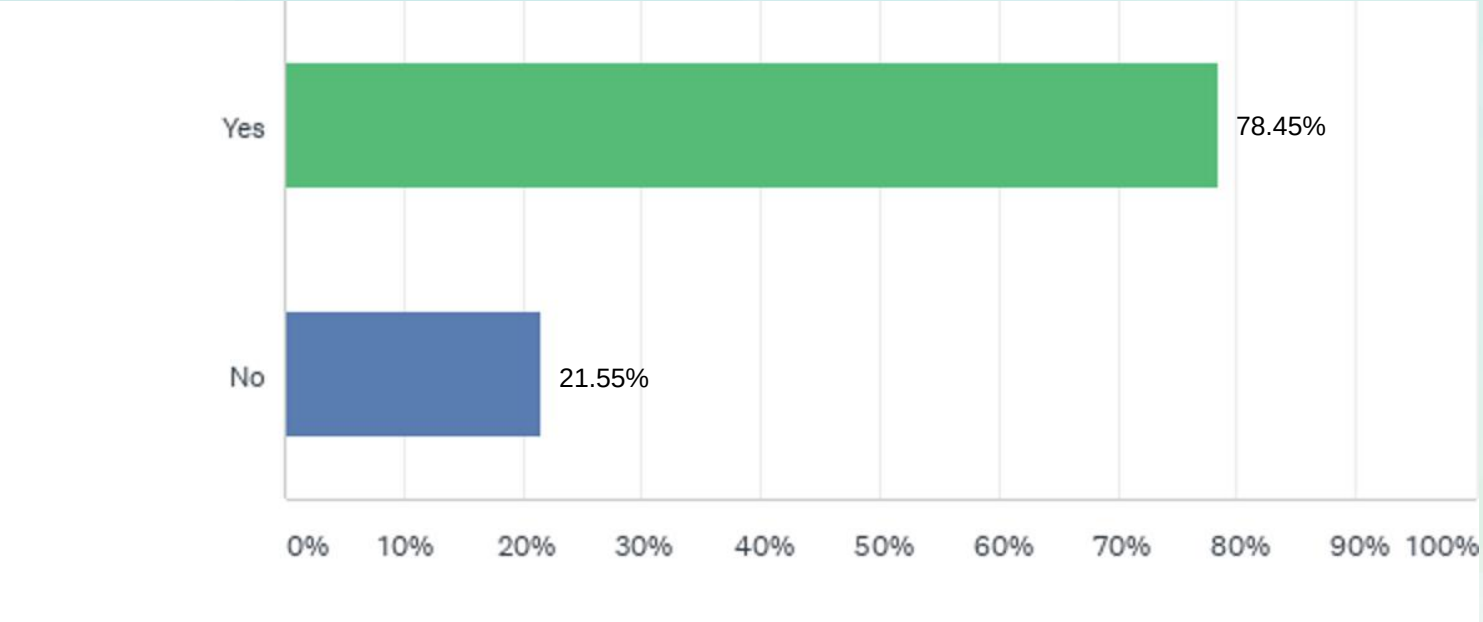
EBB Subscribers Use Their Subsidized Devices for the Expected Public Interest Purposes

If you received a device (like a tablet, laptop or similar device) subsidized by the Emergency Broadband Benefit, for what purposes did you use the device (check all that apply)?



The Vast Majority of Lifeline Subscribers Would Want an Affordable Family Plan

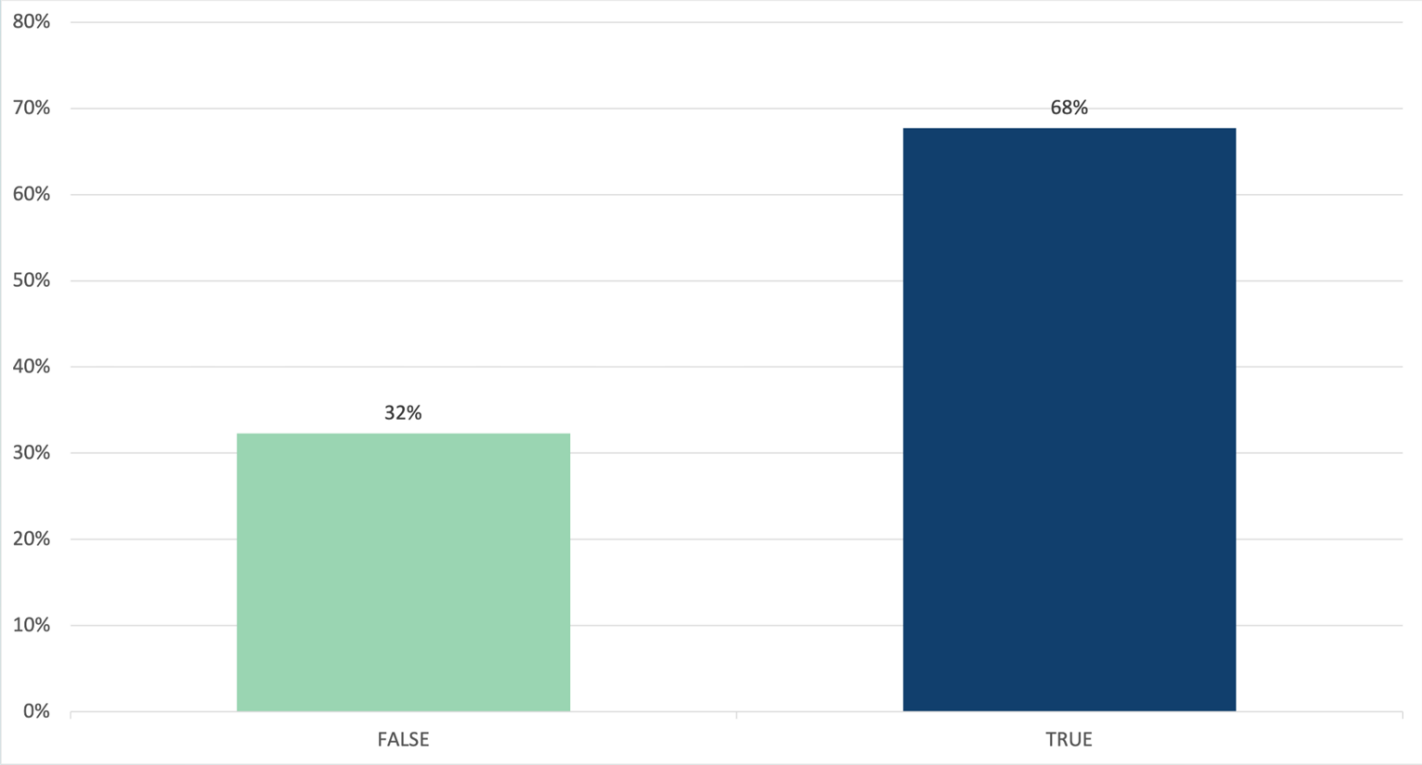
If a Lifeline family plan with more than one device were available and still affordable or free, would you seek to enroll your family in such a family plan?



National Lifeline Association

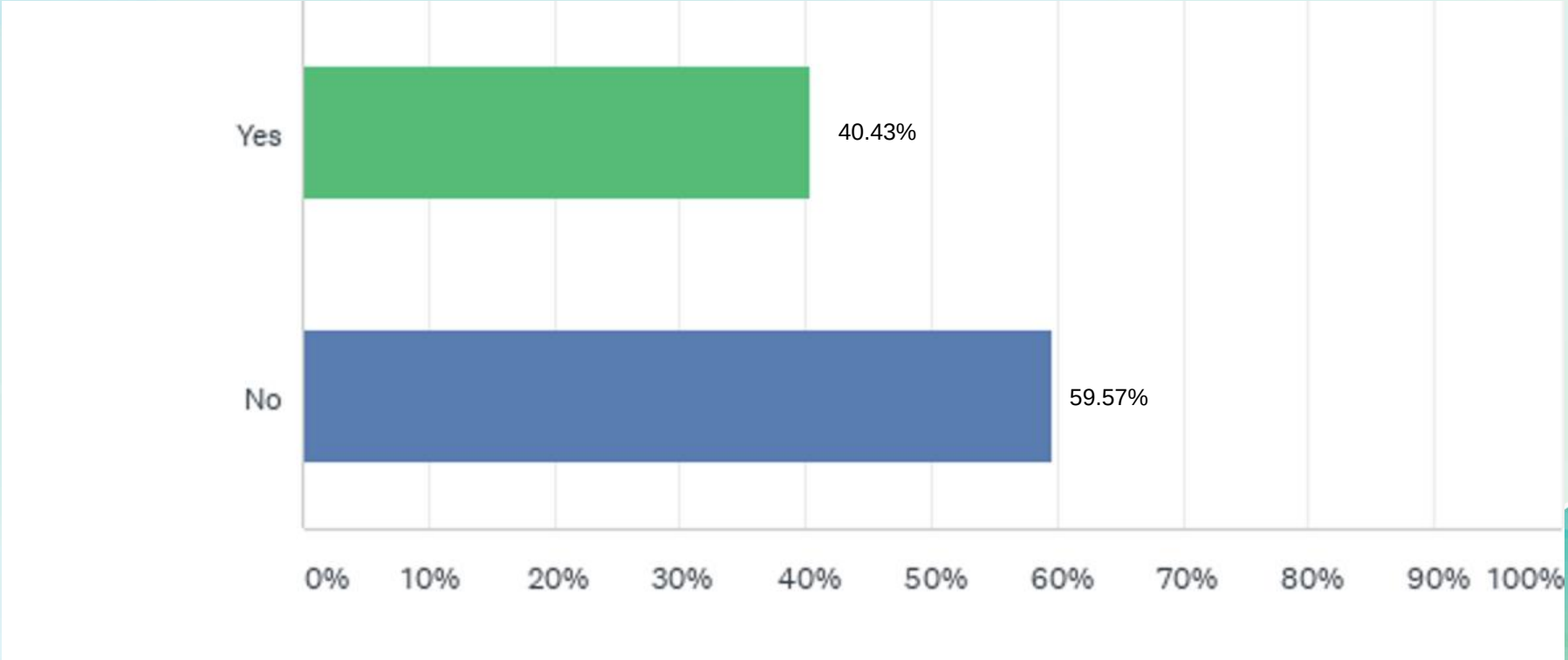
Two-Thirds of Lifeline Subscribers Are Not Able to Afford Any Monthly Payments

I am not able to afford any additional monthly payments toward my Lifeline service.



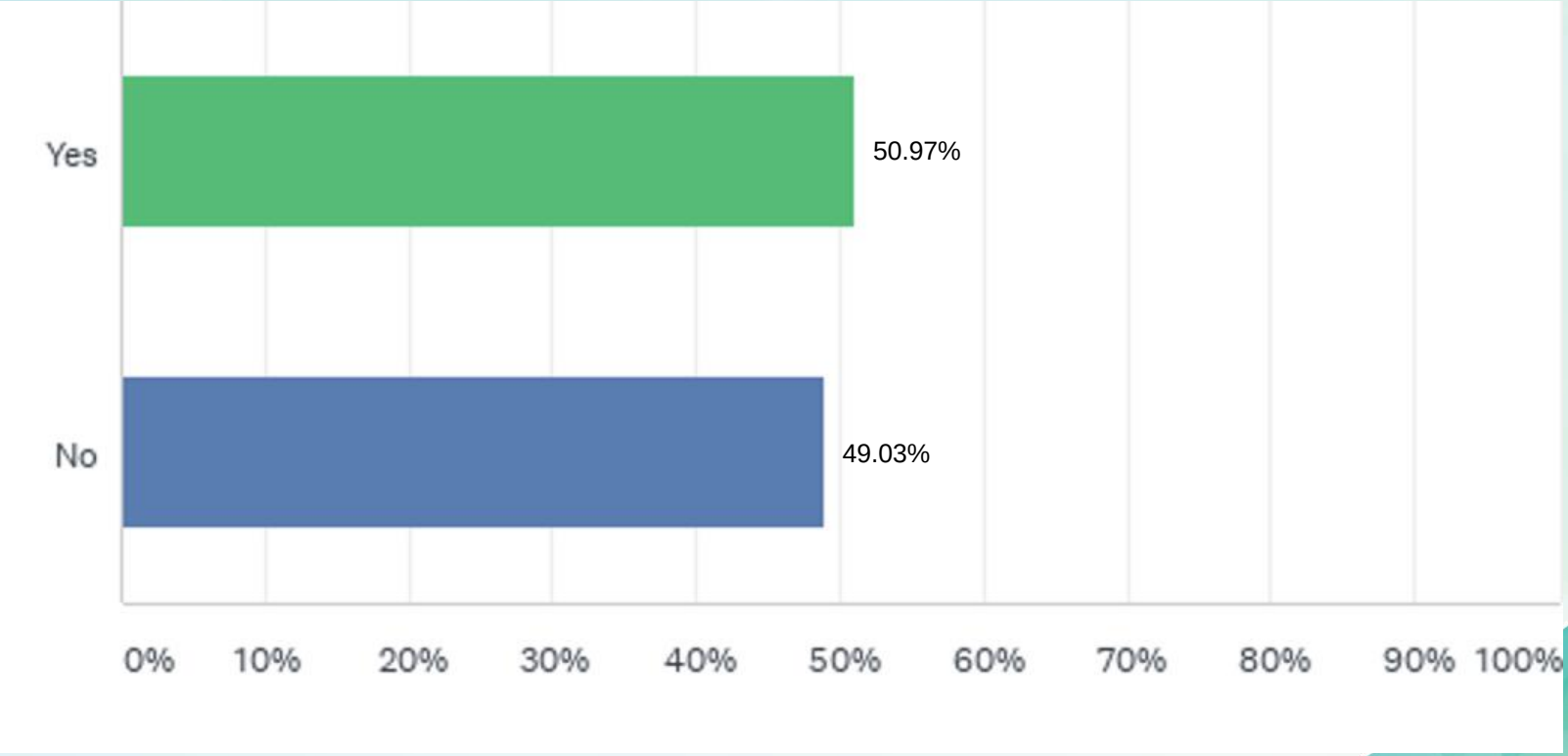
Most Lifeline Subscribers Do Not Have a Checking or Savings Account

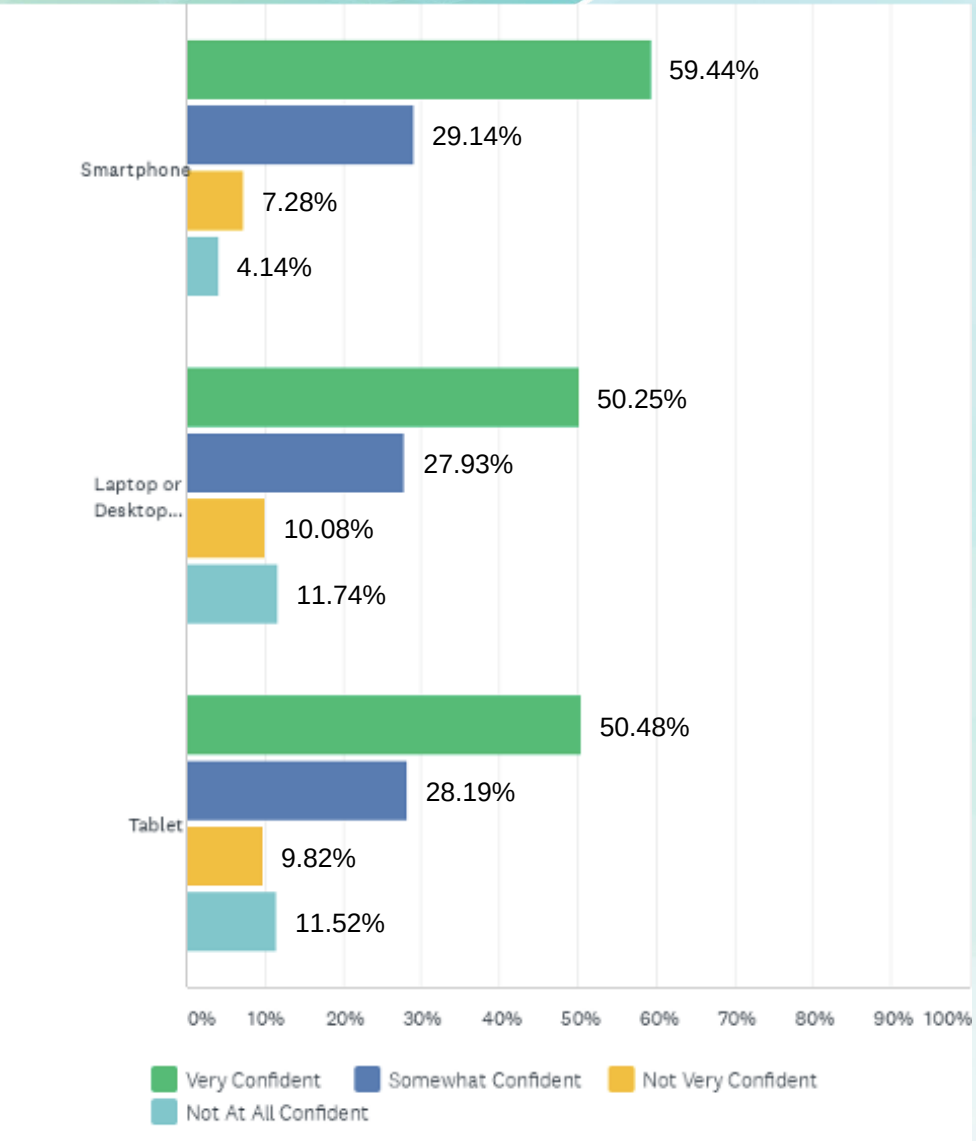
Do you currently have a checking or savings account?



Half of Lifeline Subscribers Do Not Have a Debit and/or Credit Card

Do you currently have a debit and/or credit card?





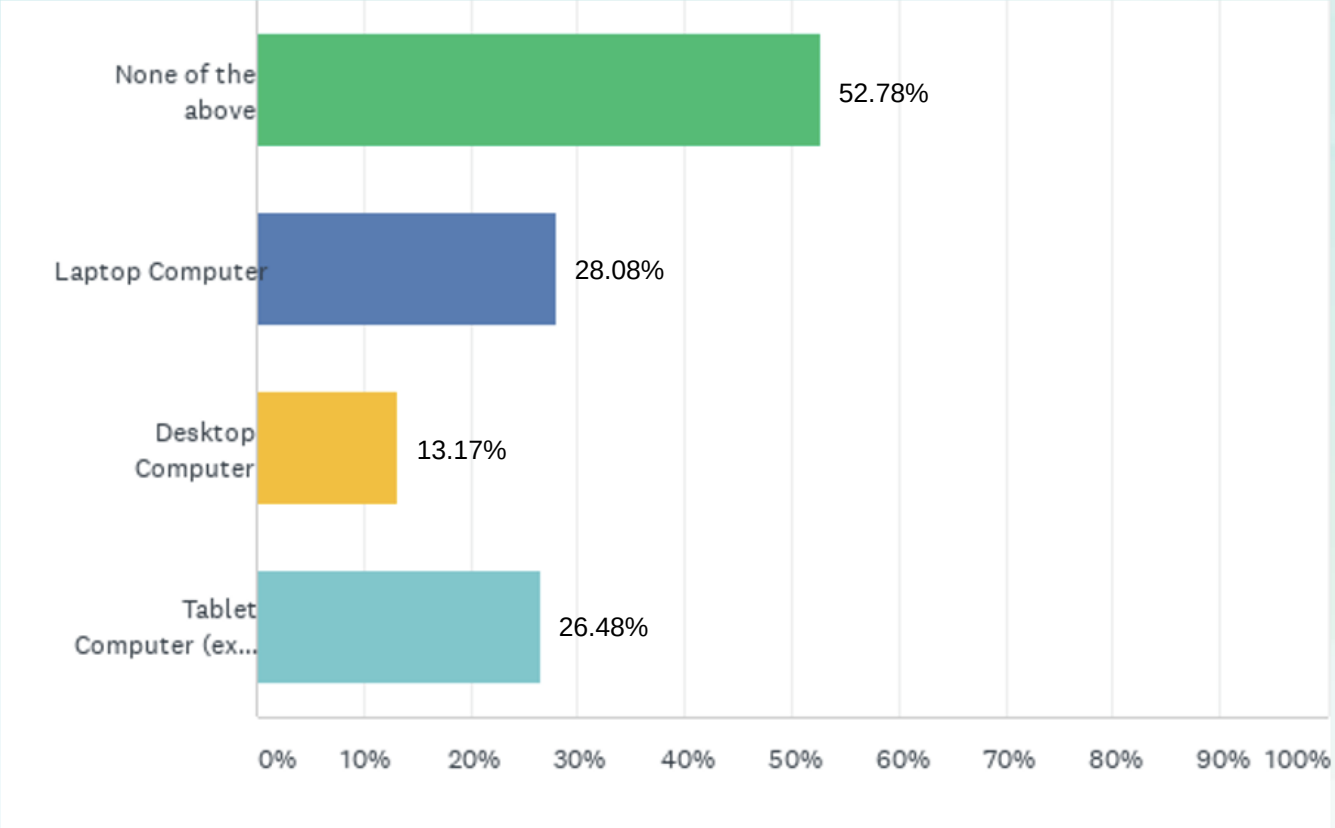
The Vast Majority of Lifeline Subscribers Are Confident in Their Ability to Use Smartphones, Computers and Tablets

How confident are you in your ability to use the following devices to access the internet and online services?

National Lifeline Association

Most Lifeline Households Do Not Own a Computer or Tablet

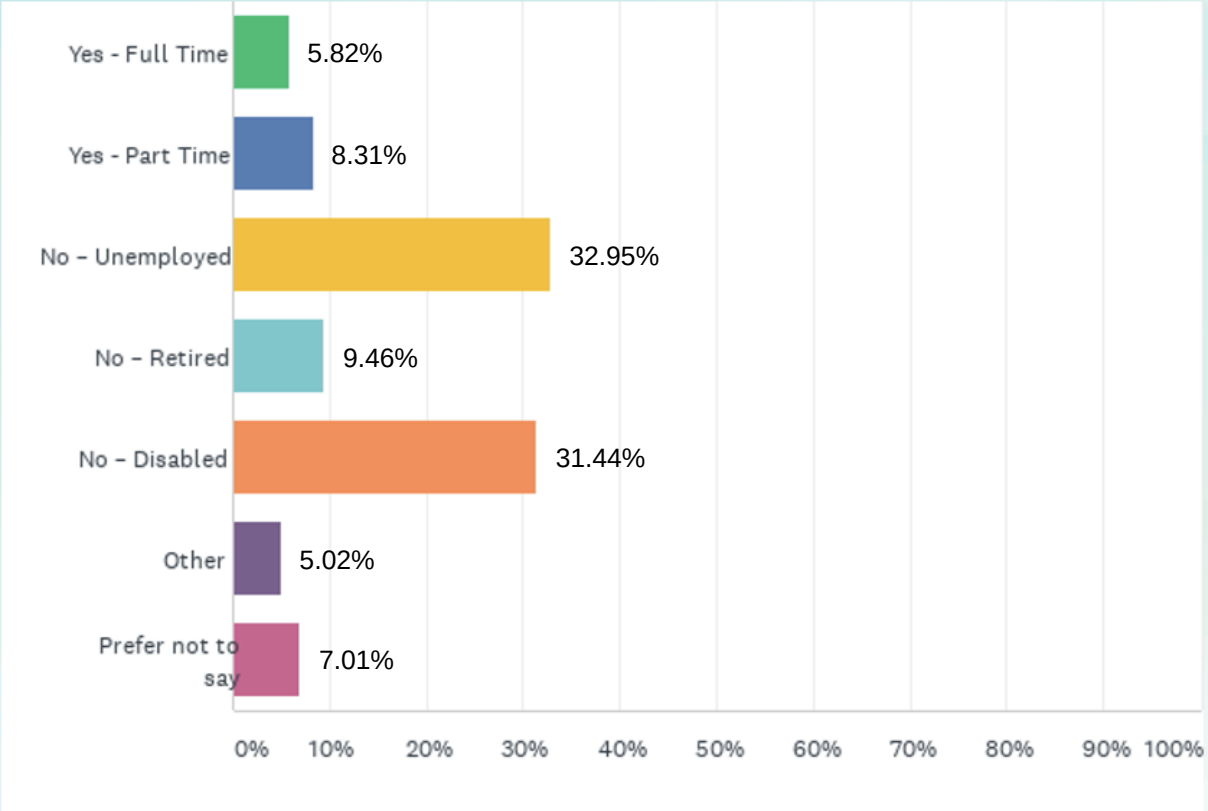
Do you or any member of your household own any of the following (check all that apply):



National Lifeline Association

Most Lifeline Subscribers Are Unemployed at This Time

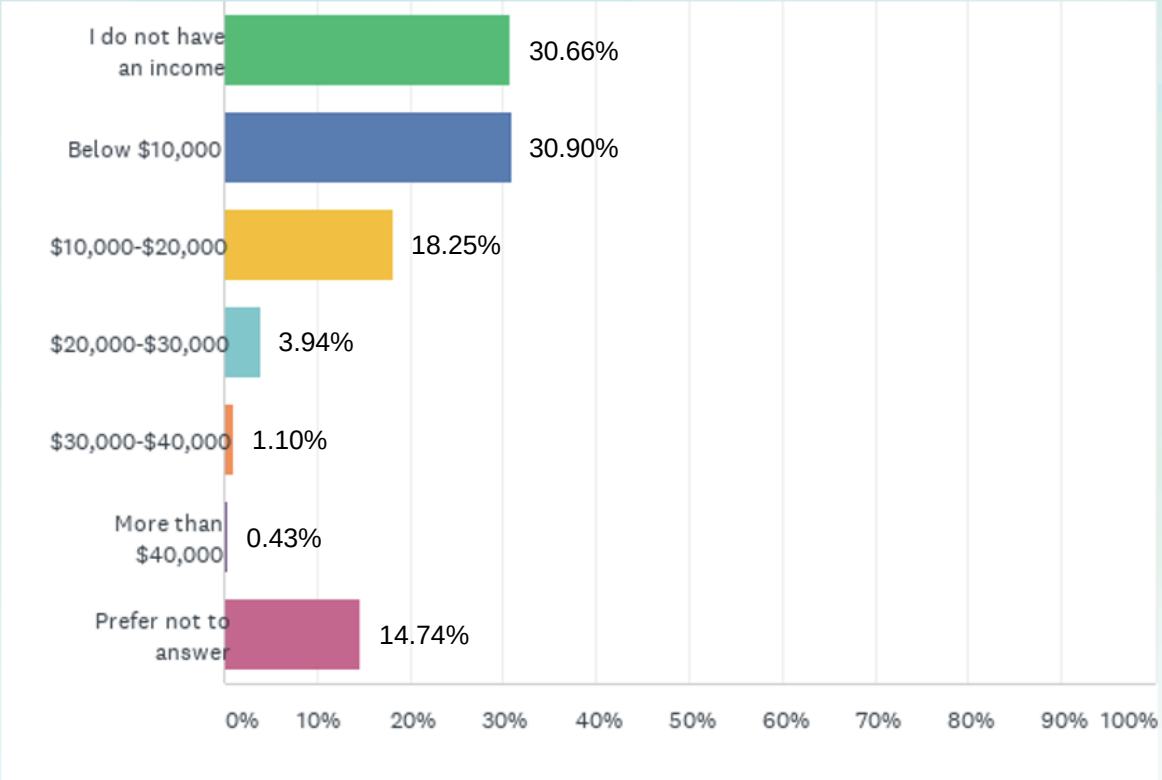
Are you currently employed?



National Lifeline Association

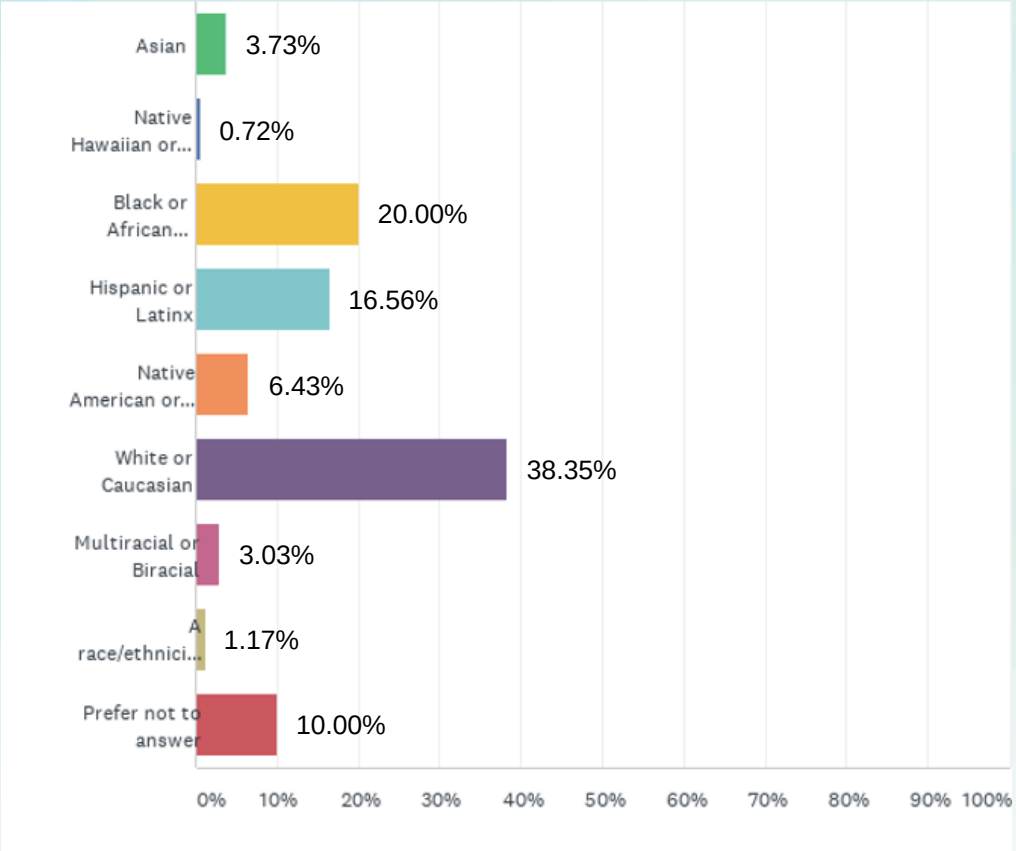
60% of Lifeline Households Have Income Below $10,000/Yr. and The Vast Majority Earn Less Than $20,000/Yr.

What is your approximate annual household income?



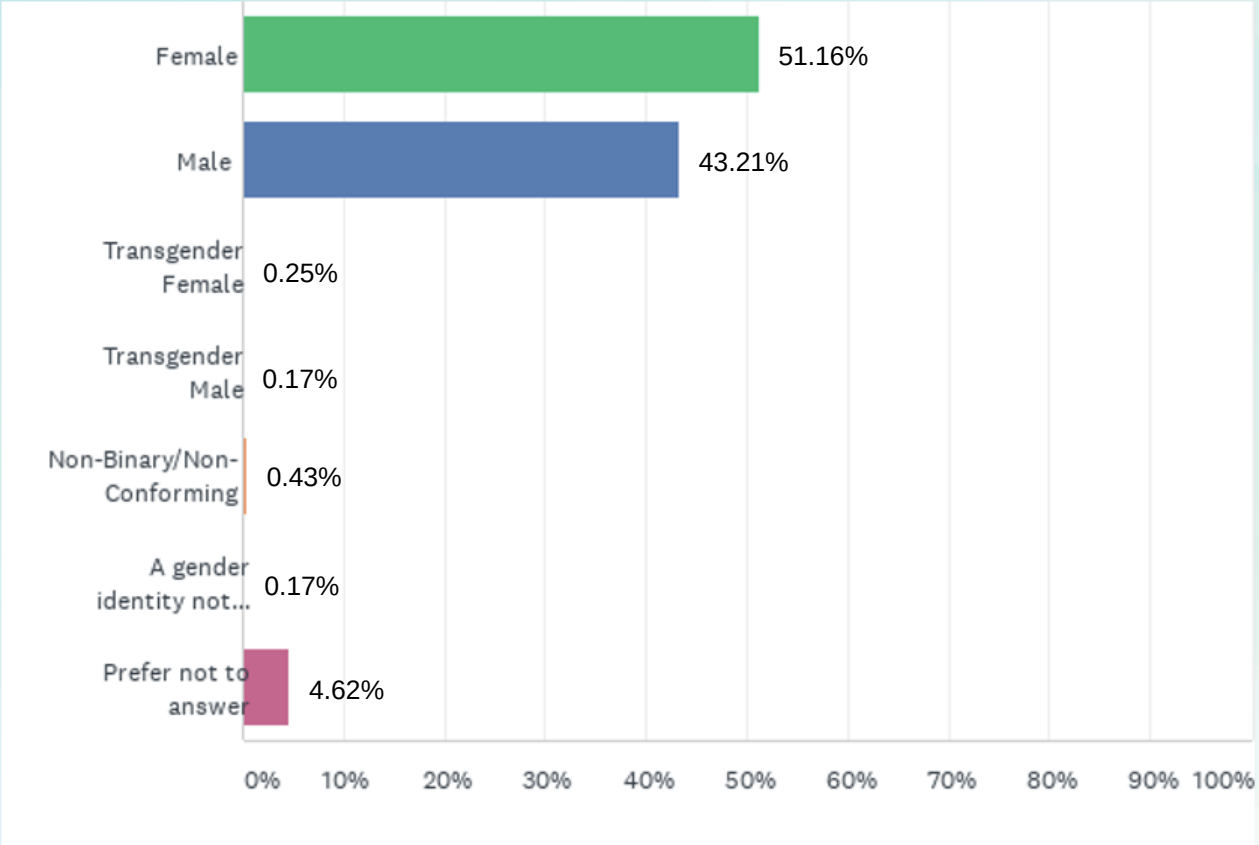
Lifeline Subscribership Includes Broad Racial Backgrounds

Which of the following best describes your race/ethnicity?



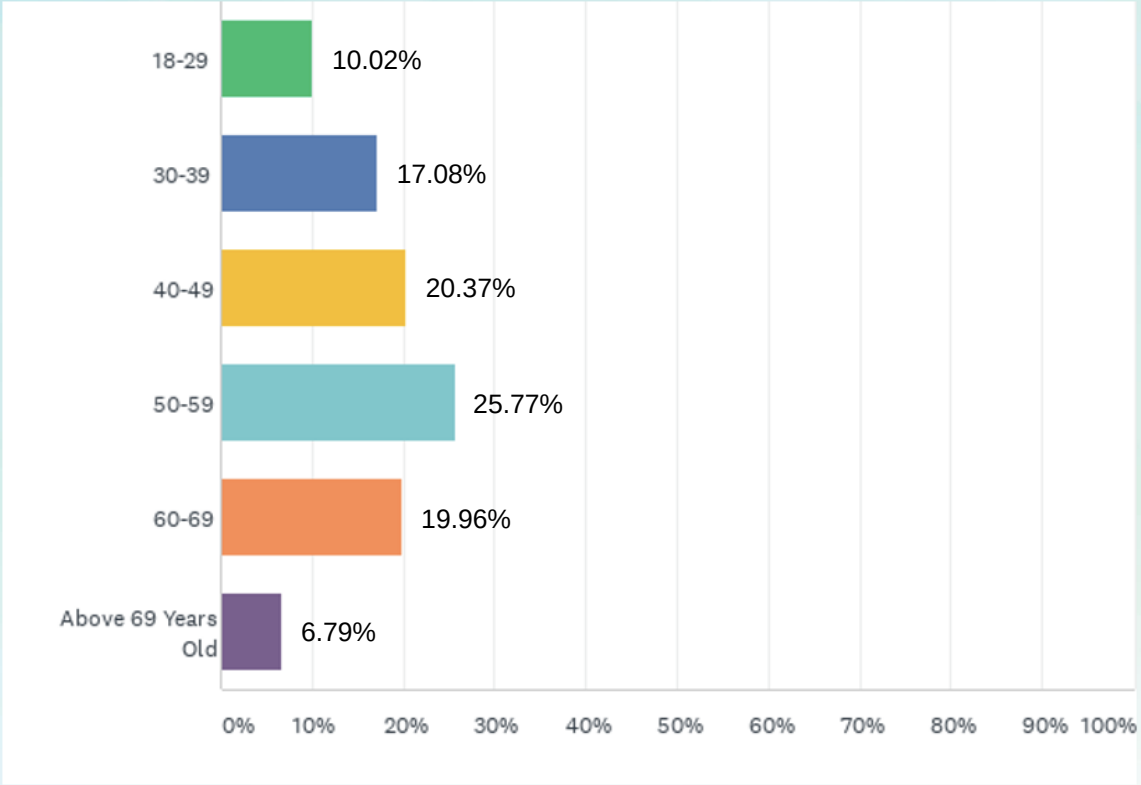
Lifeline Subscribership Is Split Fairly Evenly Between Genders

With which gender identity do you most identify?



Lifeline Subscribers Trend Middle-Aged to Older

What is your current age?



National Lifeline Association

Survey Statistics

- **All Lifeline and EBB subscribers were included in the survey**
  - California and Tribal Lifeline/EBB subscribers were included
- **43,169 active Lifeline and/or EBB subscribers responded to the survey**
- **Respondents reside in 52 states/territories**
  - Alaska is not served by the participating providers
- **9 wireless Lifeline and EBB providers participated:**
  - Airvoice, AmeriMex, Assist Wireless, Boomerang Wireless, Easy Wireless, i-wireless, Global Connection, Telrite and TruConnect
- **Survey conducted September 2 -16, 2021**
- Survey was conducted via **Survey Monkey** using a **link sent** to **active** Lifeline and EBB customers by **SMS/Text**