

January 4, 2021

SUBMITTED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L St. NE
Washington, DC 20554

Re: *Emergency Broadband Benefit Program Docket No. 20-445*

Dear Ms. Dortch:

As millions of Americans continue to grapple with the economic fall-out of the COVID-19 crisis, Congress has entrusted the Federal Communications Commission (Commission) with the critical task of developing a multi-billion dollar program to provide emergency broadband benefits. Recognizing the importance of acting quickly to help those in need, Congress has provided 60 days for the Commission to stand-up the program. Time is of the essence.

USTelecom fully supports Congress's goal of ensuring that all Americans can afford broadband service—in fact, “Tackling Broadband Affordability” was a key recommendation we made for the incoming Administration and Congress in our “First 100 Days” broadband policy roadmap.¹ While USTelecom is optimistic that the legacy Lifeline model eventually will be transformed into a long-term, sustainable means of helping ensure connectivity for consumers who may not otherwise be able to afford broadband, this emergency program represents an important opportunity to quickly deliver the power of broadband to those in need right now. Further, this program could have substantial value as a pilot program for enhanced broadband support in the future.

In order to move quickly but also deliver a successful and efficient program, the Commission should make its decisions with the following principles in mind:

- **Use Existing Resources:** Over the past few years, the Commission has made significant changes to Lifeline to verify eligibility and this updated structure provides a solid springboard for this new program—look first to it. Verifying eligibility with the new criteria will be one of the most important parts of the new program. The Commission and USAC have already undertaken a significant amount of work to establish the Lifeline National Eligibility Verifier and National Lifeline Accountability Database. The Commission should use them as the primary federal tool for providers to verify participants in all states—a “one stop shop” for providers who choose to use this service to determine eligibility. While the statute permits providers the flexibility of using alternative methods for verifying eligibility, to encourage broad participation and minimize administrative roadblocks, the Commission

¹ Open Letter from Jonathan Spalter to President-Elect Biden and the 117th Congress, at 3 https://www.ustelecom.org/wp-content/uploads/2020/11/USTelecom_First-100-Days_Building-Our-Connected-Future.pdf.

should be clear that providers have the option of relying solely on the National Verifier for this purpose.

- **Keep it Simple:** USTelecom members are eager to do their part, but participating inevitably requires implementation work, from IT systems development to call center training. If the program becomes complex, the implementation timeline will grow, ultimately delaying when customers can take advantage of the broadband benefit. Complexity could also discourage broad participation by providers. Clear compliance guidelines that recognize the unique nature and circumstances of the program are also critical. The simpler the Commission can make the program to implement the more effective it will be.
- **Build Flexibility into Program Implementation:** Given the emergency nature of this program, broadband providers will also be doing the internal work required to participate concurrently, so they will require some level of flexibility and optionality to adapt it to their existing plans and systems. Providing that flexibility will maximize participation and help ensure consumers receive the benefits Congress intended.
- **Plan for Transitions from the Outset:** It is important to plan now for how providers will transition into and out of the program. As there is a finite amount of money that will last an indeterminate amount of time, it is important for customers and providers alike to understand their responsibilities once the appropriated funding is fully expended.

This is an important moment in our collective efforts to establish universal broadband service for all in America. Using the principles above as lodestars will help establish programs that will rise to the challenge of providing immediate broadband affordability for millions. USTelecom and its members look forward to working with you to further realize the power and potential of broadband nationwide.

Please contact me with any questions.

Sincerely,



Jonathan Spalter
President & CEO
USTelecom—The Broadband Association

Cc: Chairman Pai
Commissioner Carr
Commissioner Rosenworcel
Commissioner Starks
Commissioner Simington