

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
Promoting Broadband Internet Access Service for	)	WC Docket No. 18-275
Veterans	)	
	)	
	)	

**COMMENTS OF VERIZON<sup>1</sup>**

Verizon is committed to helping veterans fully participate in the digital world. Verizon supports veterans both as an employer and as a service provider, and also supports policies that promote veterans' access to broadband services, including next-generation services such as 5G.

Verizon employs over 11,000 veterans, who apply their high-quality training and leadership skills to install, maintain, and manage Verizon's wireline and wireless broadband networks.<sup>2</sup> Verizon actively recruits veterans from every military branch; in 2017 alone, Verizon attended over 170 recruiting events for veterans. To help veterans make the transition from the military to the Verizon workforce, Verizon has established a Veterans Advisory Board – made up of veterans and active duty reservists – that offers ongoing support, recognition, and development of Verizon's veteran employees.

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<sup>1</sup> The Verizon companies participating in this filing are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

<sup>2</sup> See <https://www.verizon.com/about/careers/military>.

As a service provider, Verizon helps veterans obtain access to broadband by providing veterans with discounts on Verizon’s wireline and wireless services.<sup>3</sup> For example, Verizon provides veterans with a \$35 per month discount on an unlimited wireless plan with two lines.

The RAY BAUM’s Act of 2018 requires the Commission to report to Congress on how to promote broadband Internet access for veterans, particularly low income veterans and those living in rural areas.<sup>4</sup> Access to broadband is critical for veterans because broadband allows veterans to obtain health care services, employment opportunities, veterans’ benefits, and education and training. Veterans may take advantage of telehealth services,<sup>5</sup> including videoconferencing and connected care services such as remote monitoring of key patient data.<sup>6</sup>

The Commission has already taken important steps to foster the deployment of broadband networks for all Americans, including veterans. There are, however, significant opportunities to further promote veterans’ access to broadband through targeted policy changes and greater collaboration between the Commission and other federal agencies, including the Department of Veterans Affairs (VA).

In its report to Congress, the Commission should emphasize that policies that foster the deployment of rural broadband are of particular importance for veterans. Not only are veterans more likely than non-veterans to live in rural areas,<sup>7</sup> but the benefits of broadband access are

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<sup>3</sup> See <https://www.verizonwireless.com/support/military-veterans-faqs/>.

<sup>4</sup> Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, Div. P—RAY BAUM’S Act of 2018, §§ 501-512, 132 Stat. 348, 1879 (2018) (“RAY BAUM’S Act of 2018”).

<sup>5</sup> U.S. Department of Health and Human Services, *E-health and Telemedicine*, at 11 (August 12, 2016), <https://aspe.hhs.gov/system/files/pdf/206751/TelemedicineE-HealthReport.pdf>.

<sup>6</sup> *Id.*

<sup>7</sup> National Telecommunications and Information Administration, *Fact Sheet: Veterans’ Computer and Internet Use* (November 8, 2017), <https://www.ntia.doc.gov/other-publication/2017/fact-sheet-veterans-computer-and-internet-use>.

heightened for rural veterans. Rural veterans account for a disproportionate share of the VA's patient population; are significantly older than non-rural veterans (and are therefore more likely to be diagnosed with chronic conditions); and are more likely to live far from medical facilities or specialists.<sup>8</sup>

With the Connect America Fund (CAF), the Commission is already helping to provide veterans in unserved rural areas with access to fixed broadband networks. The Commission should move forward with other USF initiatives that will further support the deployment of broadband networks in unserved rural areas. In particular, the Commission should (1) advance the deployment of 4G LTE services in unserved areas by holding the Mobility Fund auction as soon as possible; (2) finish developing the rules for the Remote Areas Fund, which will support the deployment of broadband in areas that remain unserved after the CAF Phase II auction;<sup>9</sup> and (3) implement its proposed Connected Care Pilot Program, which will provide \$100 million to assess whether the universal service fund could promote the provision of connected care services to low-income patients, including rural veterans.<sup>10</sup>

When designing universal service programs to support rural broadband deployment, the Commission should work closely with the VA to ensure that its universal service programs are meeting the needs of veterans. For example, the Commission could coordinate with the VA to assess whether future USF programs such as the Remote Areas Fund should prioritize or increase

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<sup>8</sup> U.S. Department of Veterans Affairs, Office of Rural Health, *Rural Veterans* (last visited October 12, 2018), <https://www.ruralhealth.va.gov/aboutus/ruralvets.asp>.

<sup>9</sup> See *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949, ¶¶ 196, 204 (2016).

<sup>10</sup> *Promoting Telehealth for Low-Income Consumers*, Notice of Inquiry, WC Docket No. 18-213, FCC 18-112 (rel. August 3, 2018).

broadband deployment subsidies for areas with high concentrations of medically-underserved veterans.

The Commission should also coordinate with the VA to ensure that broadband services are affordable for all veterans in both urban and rural areas. In the *2016 Lifeline Modernization Order*, the Commission took an important step towards ensuring that veterans have affordable access to broadband by adding the Veterans Pension to the list of Lifeline-qualifying programs.<sup>11</sup> The Commission should work with the VA to assess whether additional changes to the Lifeline program could help promote low-income veterans' access to broadband. For example, the Commission has previously sought comment on adding the Veterans Affairs Supportive Housing (VASH) program, which provides benefits for homeless veterans and their families, to the list of Lifeline-qualifying programs.<sup>12</sup> The Commission and VA should also determine whether there are opportunities for coordinated enrollment of VA beneficiaries in the Lifeline program, and assess whether eligible veterans are receiving information about Lifeline services and benefits.

Although the Commission's universal service programs will play an important role in expanding veterans' access to broadband, other federal agencies should contribute as well. For example, the VA could provide direct support for broadband services that patients need for telehealth, or conduct pilot projects to demonstrate the effectiveness of broadband-enabled services. Similarly, Congress could direct that any broadband deployment loans and grants

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<sup>11</sup> *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, ¶¶ 173-176 (2016) ("*2016 Lifeline Modernization Order*").

<sup>12</sup> *Lifeline and Link Up Reform and Modernization et al.*, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, 30 FCC Rcd 7818, ¶ 102 (2015).

distributed by the Rural Utilities Service or other agencies take into account the needs of veterans.

Finally, the Commission should explain in its report to Congress that policies designed to foster the deployment of 5G networks will provide significant benefits for veterans. Not only will 5G networks enable a dramatic increase in the number of connected medical devices and sensors, but 5G networks will also enable new connected care services that take advantage of immersive virtual reality, high-quality video streaming, and the near-instantaneous transmission of medical images. For example, virtual reality developers have demonstrated that 5G networks could be used to allow physical therapists to work remotely with patients anywhere in the world.<sup>13</sup>

For that reason, the Commission should emphasize the importance of policies that accelerate the deployment of 5G networks. Policymakers should continue their efforts to expedite small cell and fiber deployment for 4G and 5G networks by removing roadblocks to the installation of necessary equipment and facilities. And the Commission should continue to make available spectrum for 5G, especially mid-band spectrum that will help expand the reach of 5G networks. As Verizon has previously explained, the United States “is facing a mid-band spectrum deficit that could ultimately slow 5G deployment, particularly beyond dense urban areas.”<sup>14</sup> The Commission should move quickly to permit commercial mobile use of the 3.7-4.2 GHz band.

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<sup>13</sup> See <https://www.verizon.com/about/news/5g-lab-simulating-interaction-between-physical-therapist-and-patient>

<sup>14</sup> Comments of Verizon, *Report on the Feasibility of Allowing Commercial Wireless Services, Licensed or Unlicensed, To Use or Share Use of the Frequencies Between 3.7-4.2 GHz*, GN Docket No. 18-122 (filed May 31, 2018).

In order to ensure that veterans have access to broadband, the Commission and other agencies should continue to promote the deployment of broadband networks; coordinate with the VA in order to ensure that the specific needs of veterans are being addressed; and adopt targeted measures to deliver broadband to veterans.

Respectfully submitted,

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