



Jessica Rosenworcel  
Acting Federal Communications Commission Chair  
45 L Street NE  
Washington, DC 20554

January 25, 2021

Regarding: WC Docket No. 20-445

Dear Acting Chair Rosenworcel,

The American Association of People with Disabilities (AAPD) is a convener, connector, and catalyst for change, increasing the political and economic power of people with disabilities. As a national cross-disability rights organization, AAPD advocates for full civil rights for the over 60 million Americans with disabilities by promoting equal opportunity, economic power, independent living, and political participation. AAPD is grateful for the opportunity to respond to the Wireline Competition Bureau's request for comments regarding the Emergency Broadband Connectivity Fund Assistance.

During the coronavirus pandemic, access to broadband internet has become essential to everything from employment to education, healthcare to food security, community living, and more. Prior to the pandemic, people with disabilities were three times less likely to go online and less likely to own multiple devices that enable them to go online.<sup>1</sup> These disparities are due in part to the high rates of poverty experienced by disabled people, as people with disabilities experience greater poverty and unemployment than those without disabilities.<sup>2</sup> This lack of connectivity also occurs because of the significant access barriers that the disability community experience when using the internet and connected devices. As it has with many other aspects of American life, the coronavirus pandemic has only widened and deepened disparities experienced by people with disabilities, particularly those experiencing poverty. While many Americans have experienced isolation during the pandemic, the lack of connectivity experienced by disabled people has caused extreme isolation. We are deeply appreciative of the new \$3.2 billion emergency broadband benefit program to assist consumers with broadband internet costs during the current COVID-19 emergency created by Congress and to the FCC for administering this program.

We strongly encourage the FCC to increase the number of supported devices eligible households can receive through the emergency broadband benefit program. People with disabilities must often purchase assistive devices and software that allows them to use the internet independently

---

<sup>1</sup> Pew Research Center. Disabled Americans are less likely to use technology. April 7, 2017.  
<https://www.pewresearch.org/fact-tank/2017/04/07/disabled-americans-are-less-likely-to-use-technology/>

<sup>2</sup> Lauer, E.A., Boege, S.L., & Houtenville, A.J. 2020. Annual Disability Statistics Compendium: 2019. Durham, NH: University of New Hampshire, Institute on Disability.



in addition to purchasing a connected device. The emergency broadband benefit will only be helpful to those who have previously experienced the greatest disconnection during the pandemic if they can receive the full complement of devices that will allow them to use the internet. Further, Ensuring that eligible households can apply the benefit to the services and devices that they choose, consistent with the statute. Relatedly, assistive technologies can often be cost prohibitive and require an individual with a disability to take on significant out-of-pocket costs because these technologies are not considered medical devices and are not covered by health insurance nor other federal assistance programs.<sup>3</sup> Because of this reality, AAPD also encourages the FCC to increase the reimbursement that providers may receive for providing connected devices and assistive technologies to eligible households of people with disabilities.

The FCC seeks comment on using the definition of “household” provided in the Lifeline rule. AAPD strongly suggests that the FCC expand the definition of “household” than is currently provided in the lifeline rule. Many households may consist of roommates or others who live together to provide each other with supports in order to live in the community. The Commission should not require the subscriber to certify that no other person in the subscriber’s economic household is receiving a benefit through the Emergency Broadband Benefit Program where two or more subscribers reside at the same address. The Commission should also not require additional more vigorous verification processes in households with multiple enrollments. Households may have multiple disabled people within who have different and/multiple access needs and each person may need to utilize the Emergency Broadband Benefit (EBB) Program in order to receive the type of connection and device they need to access the internet. Requiring more vigorous verification processes for households with multiple enrollments would impose an unnecessary administrative burden on those who have the most urgent need for this benefit. Instead, AAPD suggests that the program allow for a number of enrollments and associated devices equal to the number of eligible people with disabilities in each household. Duplicative participation may be warranted in households with multiple disability beneficiaries as this population often lives with extraordinary disability related expenses. The modest additional benefit of reduced cost for broadband can help defray other household expenses, and the greater connection for every eligible member of the household member with a disability may result in better employment, healthcare, and educational outcomes.

Regarding the eligibility requirements for the Emergency Broadband Benefit (EBB)Program, AAPD proposes that the Commission expand the eligibility beyond those currently used by providers when enrolling a household in the National Lifeline Accountability Database. Specifically, in addition to those currently eligible for Lifeline, AAPD recommends including individuals who are recently enrolled in unemployment benefits, Social Security Disability Insurance, Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

---

<sup>3</sup>Radu, Sinitia. Who’s Paying for Assistive Technology. US News and World Report. <https://www.usnews.com/news/best-countries/articles/2017-12-01/assistive-technology-keeps-growing-but-paying-for-it-is-next-challenge>. December 1, 2017.



and other federally funded poverty reduction programs. We encourage the Commission to make both verification requirements for participants and certification requirements for providers as streamlined and flexible as possible while also working to ensure that resources are efficiently used and providers are ethical in their approach. Lifeline subscribers are already subject to the same verification and subscriber tracking procedures that will be required for participating EBB households, so no additional reverification should be required. The Bureau should consider clarifying that this is an acceptable means of subscriber enrollment, and should do so without waiting for resolution of other issues related to implementation of the EBB program. This immediate clarification will allow providers to swiftly bring much-needed EBB services to their pre-qualified Lifeline customers.

The Commission should ensure that no current Lifeline recipients lose access to these benefits as the new emergency broadband benefit is implemented. To help Americans stay connected during the pandemic, the Wireline Competition Bureau took several important actions to ensure that no Lifeline subscribers were involuntarily de-enrolled from the Lifeline program during this unprecedented national pandemic, including the temporary waiver of the Lifeline program's usage requirements. This was a much-needed first step. Instead of continuing the blanket waiver for non-usage, the Commission should change the Lifeline non-usage period from 60 days to 180 days, and harmonize the EBB rules accordingly. TracFone's study of California Lifeline customers during the pandemic has demonstrated that almost half of the households whose devices were unused during the initial 60-day non-usage period resumed using the devices in subsequent months. Permanently changing the non-usage period from 60 days to 180 days will avoid interruption of sporadic non-continuous usage while ensuring that Lifeline and EBB benefits are directed toward the most beneficial and efficient use. The Commission should make these provider submissions—and supporting documentation—available to the public in their entirety. By allowing public inspection of election notices and FCC applications, the Commission can further be assured that the participating providers' purportedly EBB-eligible offerings comply with the statute and the Commission's requirements for the program. This is especially important in the context of a new program that USAC and the Commission have not previously administered—and particularly, a program that by its design incentivizes unscrupulous providers to game the system and masquerade new, hastily created offerings as duly qualified ones, all at the expense of taxpayer dollars, struggling households, and the carriers that are actually qualified and ready to serve those households.

Finally, AAPD encourages and welcomes the Commission's efforts to publicize the EBB program through partnering with disability rights organizations to conduct outreach to communities and who would benefit from the EBB program. AAPD also suggests that the Commission work with libraries, health centers, community centers and other civic institutions that frequently provide internet access and technical assistance to people with disabilities in order to publicize the program.

Thank you for your consideration of these comments. We look forward to working with the Commission to advance accessibility and connectivity for the disability community. Please do



not hesitate to reach out if you have any questions.

Best,

*Maria Town*

Maria Town

President and CEO

American Association of People with Disabilities (AAPD)