



October 18, 2021

VIA ECFS

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

**RE: *Lifeline and Link Up Reform and Modernization***  
**WC Docket Nos. 11-42, 09-197 and 10-90**

Dear Ms. Dortch:

On October 18, 2021, the undersigned, Brian Ford, and Tamber Ray of NTCA–The Rural Broadband Association (“NTCA”) met with Ramesh Nagarajan, Acting Wireline Legal Advisor to Jessica Rosenworcel, Acting Chairwoman of the Federal Communications Commission (“Commission”), regarding the phase-out of Lifeline Universal Service Fund (“USF”) support for voice-only service set to take effect December 1, 2021.<sup>1</sup>

Consistent with prior advocacy on this issue, NTCA reiterated its support for ensuring that low-income consumers have affordable access to the voice service they need and therefore urged the Commission to retain the Lifeline subsidy for stand-alone voice service.<sup>2</sup> Voice service remains critical for many low-income and older individuals who rely on such service as an affordable method of contacting health care providers, government agencies, and public safety.

NTCA further stressed the urgent need for Commission action on the NASUCA Petition for Reconsideration seeking to maintain Lifeline support for stand-alone voice service.<sup>3</sup> Urgent action is necessary because carriers all across the nation will very soon be required to inform low-income consumers of the loss of this critical subsidy if Lifeline support for standalone voice service is not retained – indeed, notices must be included in subscriber bills very soon in order to arrive by November 1. Tariff changes are required as well to account for the withdrawal of the Lifeline subsidy for voice service. If the Commission elects to retain the voice-only discount

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<sup>1</sup> *Wireline Competition Bureau Announces Updated Lifeline Minimum Service Standards and Indexed Budget Amount*, WC Docket No. 11-42, DA 19-704 (rel. July 25, 2019).

<sup>2</sup> *See Ex Parte Letter from Tamber Ray, Regulatory Counsel, NTCA, to Marlene H. Dortch, Secretary, Commission*, WC Docket No. 17-97 (fil. Oct. 5, 2021).

<sup>3</sup> National Association of State Utility Consumer Advocates, *Petition for Reconsideration*, WC Docket Nos. 11-42, 09-197 and 10-90 (June 23, 2016) (“NASUCA Petition”).

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after the required notices are provided and tariffs are amended, there is substantial likelihood for customer confusion.

Thank you for your attention to this correspondence. Pursuant to Section 1.1206 of the Commission's Rules, a copy of this correspondence is being filed via ECFS. Please contact the undersigned with any questions.

Sincerely,

*/s/ Michael Romano*

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