These are my comments regarding cellular wireless service and based on FCC-2018-0019-0001 content:

Regarding the recertification process which is the subject of paragraph 39, the proposed revision of § 54.410 paragraphs (f)(2)(iii) and (f)(3)(iii) is unsatisfactory because , by the definition of **re**certify, a person recertifying can never meet the requirement of § 54.410(d)(3)(v) which requires the person seeking recertification to certify that “to the best of his or her knowledge, the subscriber’s household is **not already receiving a Lifeline service**”. The effect of this provision, is that when paragraph (f)(2)(iii) or (f)(3)(iii) is invoked, the person must allow the service to laps then reapply. This is wasteful, inconvenient, and causes to subscriber to be without any service for at least a week each year. If a person seeking recertification is required to initial the statement in § 54.410(d)(3)(v), the process becomes an inducement to commit commit perjury because the statement is logically impossible to be true but certification cannot be completed without acknowledgement that it is true. Some providers present the statements to be certified by phone recording and I think it is easy for a subscriber to hear such a logically impossible requirement and think he must have misunderstood but then not go to the trouble of trying the process again. The revision should read

(iii) If the subscriber's program-based or income-based eligibility for Lifeline cannot be determined by accessing one or more state databases containing information regarding enrollment in qualifying assistance programs, then the eligible telecommunications carrier may obtain a signed certification from the subscriber on a form that meets the certification requirements in paragraph (d) of this section except paragraph (d)(3)(v) shall be excluded from the recertification. The subscriber must present documentation meeting the requirements in paragraph (b)(1)(i)(B) or (c)(1)(i)(B) of this section to establish continued eligibility. If a Federal eligibility recertification form is available, entities enrolling subscribers must use such form to re-certify a qualifying low-income consumer.

The proposal in paragraphs 14-20 to limit Lifeline support to facilities-based broadband service provided to a qualifying low-income consumer over the ETC's voice- and broadband-capable last-mile network is counter productive because the non facility based ETCs sometimes provide superior quality and in many cases are more available. The example I am familiar with is the Assurance Wireless program operated by Sprint Communications, Inc. I enrolled in it’s program when I first discovered it in 2011. In the latest re-enrolment, I received a ZTE N817 device in order to use the internet data component of the plan. I have found it to b e almost unusable, not only due to faulty conceptual design of the user interface (and inability of the user to make adjustments in it) but due to very frequent failures to execute the specified function and due to it’s presentation of incomplete (even deceptive by omission) information. When I contacted ZTE for advice, they said I should upgrade to a new device. Assurance Wireless says this is the only device they provide. I found a reasonable alternative on the Virgin Mobile web site which I can purchase for $20 but, while Assurance Wireless admits that they operate on the same equipment as Virgin Mobile (both owned by Sprint Communications), they claim they are unable to use the same phones. There is a reseller DBA Access Wireless which also uses the Sprint network that has no problem using these phones as long as they are not Carrier Locked to another carrier. They can easily solve the problem and provide superior service at the same price. As long as facilities-based ETCs are producing artificial barriers, it would seem to be more cost effective to have competitive ETCs operating on the same hardware than to build out redundant hardware networks. If non facility based ETCs are to be phased out, new minimum service standards should be developed to require the remaining ETCs to support capabilities previously supported by the then prohibited ETCs. Unfortunately this might further discourage them from offering any Lifeline service.

Regarding paragraph 21 47 U.S.C. 254(e) states “A carrier that receives such support shall use that support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.”, Services should include the service of administering the program. Limiting payments to resellers to what they pay their wholesale carriers would ignore these costs and guarantee that they loose money. This would just be a way of eliminating them indirectly and should not be attempted.

As to the “ways the Lifeline program can responsibly empower Lifeline subscribers to obtain the highest value for the Lifeline benefit through consumer choice in a competitive market ( paragraph 29 ), regarding ETCs without regard for what facilities they use is the second step. The first step of abolishing the port freeze has already been accomplished.

Regarding paragraph 30, I don’t know about the statutory authority, but from a customer viewpoint, no equipment should be prohibited by regulation but rather, the customer should have the right to use any equipment that is capable of being efficiently used by the carrier’s facility. To take an example, Assurance wireless is permitted to offer a very badly performing ZTE N817 that the manufacture recommends be replaced by a newer model but is prohibited from offering the previously offered Kyocera S1300 which is far superior for some purposes, and is permitted to prohibit use of other more suitable equipment. At the same time the ZTE N817 is barely usable and is the only device allowed on their network that is capable of being used as a “hotspot”. Related to this is artificial limitations imposed by equipment suppliers on use of their equipment. For example Virgin Mobile, part of Sprint Communications, says “YOU ARE PERMITTED TO USE THIS MOBILE PHONE AND THE CONTENT ON IT EXCLUSIVELY WITH VIRGIN MOBILE SERVICE”. This is entirely unreasonable. If the device is sold at a discount to encourage use of the service, there should be a way to undo the subsidy and use the device on any compatible service. On the other hand abusive charges such as “tethering charge[s] are reasonably prohibited because the ETC incurs no additional expense from it’s use.

Regarding paragraphs 61-65,79, First it is useful to compare Lifeline rates to open market rates. Here are a few Cellular wireless rates:

NET10 $30 plus $5 per 2GB 4G LTE data ($35 minimum) Unlimited voice, SMS, 2G data

AT&T $30 Unlimited voice & SMS, 4G LTE data 1 GB, $45 6GB After high- speed data allowance is used, data speeds are slowed to a max of 128Kbps

Virgin Mobile $35 Unlimited voice & SMS, 4G LTE data 5GB, $45 10GB Once plan’s high-speed data allotment reached, speeds reduced to 2G

Access Wireless $35 unlimited voice & SMS, data 3 GB, $10 per 1 GB additional

Assurance Lifeline 350m voice +3G data 1 GB free, $5 per 250m, $5 per 1GB data

Access Wireless Lifeline 250m voice+ 1 GB free, additional can be purchased

It is apparent that after the $9.25 subsidy is included, the Lifeline program offers by far the lowest cost of entry but not necessarily the lowest cost to the intensive user. **From this, I conclude that there should never be a length of time limit for participation but to limit total program cost, some discount level may be imposed at some time.** To limit administrative costs, user payments would probably be quarterly or annually. If some payment is to be used to prevent people from being unknowingly subscribed, an annual payment would suffice. Because the minimum service standards are being met at the current subsidy level (with no payment by the customer), the minimum discount level proposed in paragraph 65 makes no sense, but if the subsidy level was to be reduced in the future as a cost cutting measure, the minimum service standards could be abolished. Then add on costs could be used to tailor the service to customer needs. This assumes that the program offered is sufficiently flexible to do so. Some form of regulation may be needed to insure that it is. One more thought: All the above open market plans provide unlimited data at reduced speed. G2 only equipment is being phased out so I understand 2G speeds to be 500 kbps provided over a higher speed capable system. This is over 10 times the capability of the switched voice network. If this speed is actually achieved, can the minimum service standard annual upgrades be amended to provide more data at that rate while holding the 3G data limit at 1 GB/month, or alternately can the service agreement be amended to permit the customer to purchase additional 2G speed data at a lower price than the 3G speed? As a comparison, here are some speeds I actually measured (unedited sequence over 2 days) using <http://www.bandwidthplace.com/> on Sprint PCS provided Lifeline at very far off peak times with good signal strength in Mbps. As you see, the G2 speed is not a great disadvantage:

Download Upload

1.08 .77

1.60 .83

.97 .62

.45 .75

.84 .71

.65 .71

.95 .67

1.17 .78

Regarding Paragraph 66 and the low rate of adoption, some improved usability might be achieved by regulation requiring Lifeline providers to allow users to purchase and use a device of their choice as long as it is compatible with the underlying facility. It is my observation that many qualified persons have subscribed to high cost services rather than enroll in Lifeline because they are not satisfied with the limitations of the Lifeline service. Some do this even though they are unable to pay their electric bill. In fact they are not even concerned about conserving electricity. I do not think any effort should be made to accommodate these people. They will always act poor while failing to conserve resources, but for others better service at no additional cost can be achieved through more freedom in equipment choice. I can easily understand a new Assurance Wireless subscriber deciding that is hopeless and to either do without or buy something expensive.

One thing that could be done to reduce program cost would be to add qualifications that no one in the economic unit already subscribe to specified services or agree to discontinue it upon activation of the Lifeline service. The idea being that they do not need the subsidized service if the economic unit has the other one.