# USCCB

# Office of the General Counsel

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February 21, 2018

Chairman Ajit V. Pai

Federal Communications Commission

445 12th St. S.W.

Washington, D.C. 20554

RE: Close the Digital Divide, Protect the Lifeline Program, WC Docket Nos. 17-287, 11-42,

09-197

Dear Chairman Pai:

The United States Conference of Catholic Bishops (“USCCB”) submits the following comments in the above-captioned Notice of Proposed Rulemaking, released December 1, 2017.

USCCB is a corporation organized under the laws of the District of Columbia. All active Catholic Bishops in the United States are members of the USCCB. USCCB advocates and promotes the pastoral teachings of the Bishops in such diverse areas as education, health care, social welfare, immigration, civil rights, family life and communications (including support for universal telephone and Internet services to all).

Broadband access at home is essential to meeting students’ homework needs, connecting religious communities, and gaining access to governmental services and potential employers. Telephone services is essential for public safety. The Commission’s proposals to restrict and reduce Lifeline services will cut off whole communities from these necessary connections. Lifeline services are more important in 2018 than ever. Between 2013 and 2016, the number of people who have access to broadband only through their smartphones but have no home broadband increased by 12%. Almost half of these smartphone-dependent persons have had to shut of their cell phone service for a period of time because the cost is too great. [[1]](#footnote-1) Barely more than half of households with income less than $25,000 have broadband access.[[2]](#footnote-2)

The Commission is now choosing not to focus on this need for broadband, but on fraud in the Lifeline system. New proposals to address fraud are premature. Just over a year ago, the Commission made major changes in the Lifeline program, including steps to address fraud, which rule changes are not yet fully implemented. *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016). The most important tool to address fraud, the national verifier system, will not begin to operate until 2018. The Commission must let these direct efforts to combat fraud work before considering further proposals.

USCCB urges you to reject the new proposals to radically disrupt the Lifeline program.

Sincerely,

Katherine G. Grincewich

Assistant General Counsel

cc: Commissioner Mignon Clyburn

Commissioner Michael O’Rielly

Commissioner Brendan Carr

Commissioner Jessica Rosenworcel

1. Pew Research Center, *Digital Divide Persists even as lower-income Americans make gains in tech adoption,* March 22, 2017; *A Portrait of Smartphone Ownership*, April 1, 2015. [↑](#footnote-ref-1)
2. Thom and Camile Ryan, *Computer and Internet Use in the United States: 2015*, American Community Service Reports, ACS-37.

   [↑](#footnote-ref-2)