This is a comment or clarification of the comment linked at <https://www.fcc.gov/ecfs/filing/10214275505202>. relating to the next to last paragraph, beginning “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.” The intent is to improve adoption by making the service attractive to a wider range of people. While this comment specifically addresses “wireless broadband”, the same principles would apply to wired broadband internet service. Providing a communications service entirely or almost entirely funded by the USF was a breakthrough that should not be easily undone. The alternatives to the existing minimum service requirements discussed should be considered on the basis of providing maximum utility within the cost constraint of the USF. While the Third Report (FCC 16-38) pays lip service to cost, the methodology adopted “for data usage allowance in line with the principle of supporting services that a ‘substantial majority’ of American consumers subscribe to, and given the types of data that are publically and regularly available, the minimum service standard for mobile broadband data usage allowance will be 70 percent of the calculated average mobile data usage per household” could lead to out of control cost. One approach to this would be to establish a minimum service standard constrained by the USF contribution or a small overage. The detail largely depends upon whether or not data is cheaper at low speeds than at higher speeds, but after the minimum standard is established, upgrade options to increase usability by increasing speed (if applicable) and data allotment (independently selected) based on estimated actual cost would increase usability and potentially increase the rate of adoption while complying with the Commission’s stated belief that, at a minimum, services that are subscribed to by a substantial majority of the nation’s consumers should receive Lifeline funding while providing equitable cost sharing between the USF and end user. The fact that Access Wireless charges $10 per 1 GB additional data demonstrates the need for regulation of the expanded portion of the Lifeline service. This does not mean that the supplier could not charge higher prices for service beyond the Lifeline minimum service levels as calculated under current rules or some revision thereof.

As support for the idea that speed limiting G3 data transmission to the G2 limit of .5 Mbps is not a big sacrifice, the following is an unedited list of speed measurements made using the Sprint PCS G3 system in units of Mbps with very good signal strength:

Date time DL UL

02/18/2018 13:40 .66 .70

02/19/2018 15:18 .53 .57

02/20/2018 12:27 .74 .69

02/20/2018 13:32 1.06 .80

02/20/2018 21:08 .32 .48