



October 29, 2018

Chairman Ajit Pai
Commissioner O'Rielly
Commissioner Rosenworcel
Commissioner Carr
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**National Association of
American Veterans™**

*Serving Our Nation's Service Members and Veterans
with Honor and Respect*

RE: WC Docket No. 18-275, Promoting Broadband Internet Access Service for Veterans

Dear Chairman Pai and Commissioners O'Rielly, Rosenworcel and Carr,

We appreciate this opportunity¹ to highlight how critical affordable broadband internet service is to access to healthcare, job opportunities, education and connections to social support networks for veterans, particularly low-income veterans and veterans living in rural areas. Broadband internet has transformed vital aspects of modern life. It helps ensure ready access to health information and healthcare, facilitate life-long learning through delivery of online courses, provide access to financial institutions and their products and services, as well as enable civic engagement and access to governmental services.

While several federal programs direct billions of dollars annually to projects that deployment of broadband infrastructure², only Lifeline focuses on affordability of essential communications services for low-income households. We urge the Commission to recognize the role of Lifeline in helping low-income and rural veterans afford critical broadband internet service. Furthermore, we urge the Commission to strengthen the ability of Lifeline to help low-income veterans access essential services, in both rural and urban areas, and to ensure efforts such as the "Anywhere to Anywhere" telehealth program are truly affordable to veterans anywhere in America.

An estimated 1.3 million veterans use Lifeline.³ Thanks to reforms adopted by the FCC in 2016, eligibility for Lifeline can be established today by participation in other federal programs servicing veterans such as the Veteran Pensions and Survivors benefit program.⁴ Nevertheless, we agree with commenters in the above referenced docket that the Commission can do more to make Lifeline an even friendlier and more accessible program to our nation's low-income veterans. That includes the FCC working with the Department of Veterans Affairs (VA) to identify and assess whether the addition of other federal eligibility programs such as VA's Supportive Housing (VASH) Program could help promote low-income veterans' access to broadband.⁵ We also agree with others that recommended a reassessment

¹ FCC Public Notice, Wireline Competition Bureau Seeks Comment on Promoting Broadband Internet Access Service for Veterans, WC Docket No. 18-275, DA 18-947 (Rel. Sept. 12, 2018) (Section 504 of the Ray Baum Act of 2018 directs the FCC to report to Congress on promoting internet access to veterans, particularly low-income veterans and veterans living in rural areas).

² [High Cost, USDA RUS and NTIA]

³ <https://www.militarytimes.com/opinion/commentary/2018/06/08/this-program-helps-13-million-vets-stay-connected-the-fcc-wants-to-gut-it/>

⁴ Lifeline qualifying programs include: Veteran Pensions and Survivors Benefit, Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), Medicaid and certain Tribal programs.

⁵ See Comment of Verizon, In the Matter of Promoting Broadband Internet Access Service for Veterans, WC Docket No. 18-275, DA 18-947 (Rel. Sept. 12, 2018)

of Lifeline Program's income-based eligibility threshold.⁶ Currently, veterans with a spouse and child who have a 100% disability rating may receive service-connected disability compensation at rates that render them ineligible for the Lifeline program. For these disabled veterans, affordability could remain a significant factor for broadband adoption unless they can qualify for Lifeline via enrollment in Medicaid or other existing eligibility programs.

The lifeline services offered by wireless resellers provide tremendous value to our nation's low-income veterans and serve as a true bridge for these low-income households to participate in today's broadband economy. It is especially true given the fact that a recent report by the Consumer Financial Protection Bureau found that communications-related debt is the third largest kind of debt for consumers, only behind medical debt and credit card debt. There is thus no question that phone and broadband bills comprise a significant portion of Americans' monthly expenses today, and no-cost Lifeline offerings could play a significant role in helping to lift low-income families out of poverty. It is therefore crucial for the Commission to preserve no-cost Lifeline offerings.

The benefits of broadband for veterans cannot be overstated. Affordable broadband service is critical for access to employment opportunities, fulfill banking and other financial transaction needs, engage in distant learning opportunities, and obtain critical health care services through telehealth. Each of them has the potential to erase barriers to quality services due to the challenges of geography for veterans living in rural, insular areas or veterans with limited mobility due to disability. We urge the Commission to invest additional resources into improving outreach on Lifeline to veterans, facilitating Lifeline enrollment, and ensuring a competitive Lifeline marketplace to foster innovation and robust Lifeline broadband services.

We appreciate the opportunity to provide these comments and we look forward to working with the Commission to ensure veterans and their families have access to affordable, essential broadband services, regardless of where they live and their income.

Sincerely,



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National Association of American Veterans, Inc.

⁶ See Comments of NTCA – The Rural Broadband Association, IN the Matter of Promoting Broadband Internet Access Service for Veterans, WC Docket No. 18-275, DA 18-947 (Rel. Sept. 12, 2018)