

October 29, 2018

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

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

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

The undersigned organizations 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 who are heavily represented in rural areas. Broadband internet has transformed vital aspects of modern life from ready access to health information and healthcare, to facilitating life-long learning and the delivery of education, to modern commerce with banking and online commerce, to means of civic engagement and access to services, to connection to loved ones and community. Lifeline is one existing FCC program that already assists low-income people in the U.S. in obtaining affordable broadband, including veterans.² Therefore, we believe a critical component of bringing broadband services to veterans is to strengthen the Lifeline program and reject recent proposals that will particularly harm older Lifeline subscribers and Lifeline subscribers with disabilities—populations that overlap significantly with the veteran population. Lifeline can help low-income veterans access essential services, in both rural and urban areas, to ensure efforts such as “anywhere-to-anywhere”³ quality health care and opportunities are truly affordable to veterans anywhere in America.

Affordable broadband is critical for veterans and their families. Telehealth has the potential to erase barriers to quality healthcare due to the challenges of geography for veterans in rural areas or veterans with limited mobility due to disability. Telehealth can connect patients with their healthcare team online or via texts. Apps designed to help with scheduling of appointments, management of chronic conditions, delivery of relevant healthcare information and post-op care can improve healthcare outcomes for veterans. Telehealth can also promote independent living and access to 24/7 care. Affordable communications are also important for initiatives such as suicide prevention, treatment of depression and post-traumatic stress.

Affordable broadband service is also critical for access to online job boards, online banking online learning opportunities, and a host of other services. For example, allowing veterans to access online job boards and other online career resources will help them find work when they return home. Online banking can make it easier for veterans to manage their finances. Online educational opportunities can often better accommodate veterans who may not be able to return

to a traditional classroom. And of course, access to broadband is critical for veterans to connect with loved ones and their community.

The modern Lifeline program assists with access to affordable broadband which makes these technologies accessible to veterans. Lifeline is a federal program created in the Reagan administration to help low-income families afford basic telephone service. Lifeline was expanded in the Bush administration following Hurricane Katrina to include affordable wireless service in recognition of the value a mobile service for households displaced by natural disasters. The program has undergone numerous reforms to ensure program integrity and now also supports affordable broadband internet service. Lifeline is available in all 50 states and territories.

Lifeline is particularly useful for veterans. Eligibility for Lifeline can be established by participation in other federal programs such as the Veteran Pensions and Survivors benefit program.⁴ According to one estimate, 10 to 13 percent of Lifeline beneficiaries are veterans of U.S. military service.⁵ Veterans living in rural areas are highly likely to be eligible for the Lifeline program. According to the Department of Veterans Affairs, 52 percent of veterans living in rural areas earn less than \$35,000 annually and 27 percent do not access the internet at home.⁶ One of the most popular Lifeline products is the prepaid wireless bundle of voice and data. However, recent Commission proposals threaten to cut off 70% of Lifeline subscribers,⁷ which includes over one million veterans who currently rely on the program for affordable broadband.⁸ Further proposals such as lifetime benefit limits, hard budget caps, and mandatory co-pays are likely to harm seniors and people with disabilities the most negatively. Any proposal that assumes a person is only temporarily in need of assistance is likely to harm people, like our nation's veterans, who may be living with lifelong physical or mental disabilities and who may need more assistance—not less—as they age. While the FCC and other agencies may consider new federal programs to help veterans access these critical services,⁹ we also urge the Commission to invest resources into improving outreach on Lifeline to veterans, facilitating enrollment into Lifeline and ensuring a competitive Lifeline marketplace to foster innovation and robust Lifeline broadband services.

Lifeline works in coordination with programs that bring infrastructure to rural areas. Several federal programs focus billions of dollars annually on deployment of broadband infrastructure,¹⁰ but only Lifeline focuses on affordability of essential communications services for low-income households. Deploying infrastructure to a rural area does not guarantee the service which is offered over that infrastructure will be affordable.¹¹ We urge the Commission to view these programs together and to recognize the role of Lifeline in helping low-income and rural veterans afford critical broadband internet service in rural areas.

In conclusion, 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,

Center for Rural Strategies
Community Solutions International
Delta Veterans Group, Antioch, CA
Disabled American Veterans (DAV), Chapter 14, Washington DC
High Ground Veterans Advocacy
Minnesota Assistance Council for Veterans
National Alliance to End Homelessness
National Association for Black Veterans
Veterans Education Success
Veterans Enterprise Training Academy (VETS Group)
VetsFirst
Vietnam Veterans of America

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 Lifeline Support for Affordable Communications (FCC), *available at* <https://www.fcc.gov/consumers/guides/lifeline-support-affordable-communications>.

³ See e.g., U.S. Department of Veterans Affairs, News Release, *VA Expands Telehealth by Allowing Health Care Providers to Treat Patients Across State Lines* (May 11, 2018). Available at <https://www.va.gov/opa/pressrel/pressrelease.cfm?id=4054>

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 Letter from Constance Burns, National Association of American Veterans, FCC, WC Docket No. 17-287 (filed Nov. 9, 2017).

⁶ Rural Veterans, U.S. Department of Veterans Affairs, Office of Rural Health, <https://www.ruralhealth.va.gov/aboutus/ruralvets.asp>.

⁷ See Opening Comments on the Notice of Proposed Rulemaking and Notice of Inquiry by Low-Income Consumer Advocates, WC Docket No. 17-287 et al (filed Feb. 21, 2018).

⁸ Jessica Rosenworcel, This program helps 1.3 million vets stay connected. The FCC wants to gut it, *Military Times* op-ed, June 8, 2018.

⁹ The Commission recently adopted a *Notice of Inquiry* that would implement a telehealth pilot program using Universal Service Funds targeted to low-income consumers and those living in rural and unserved areas. Promoting Telehealth for Low-Income Consumers, *Notice of Inquiry*, WC Docket No 18-213, FCC

18-112 (rel. Aug. 3, 2018). We commend the Commission for seeking new ways to connect veterans to telehealth services but urge that this new initiative does not undermine the Lifeline program in any way.

¹⁰ See, e.g., Universal Service for High Cost Areas – Connect America Fund, <https://www.fcc.gov/general/universal-service-high-cost-areas-connect-america-fund>; Rural Utilities Service, United States Department of Agriculture rural Development, <https://www.rd.usda.gov/about-rd/agencies/rural-utilities-service>; Broadband Grants, National Telecommunications and Information Administration, <https://www.ntia.doc.gov/grants-combined>.

¹¹ In fact, the Commission proposal to cut off 70 percent of existing Lifeline subscribers would likely disincentivize infrastructure deployment because carriers that lease their networks to Lifeline companies would lose an important source of revenue.