

July 11, 2018

Chairman Ajit V. Pai
Commissioner Mike O’Rielly
Commissioner Jessica Rosenworcel
Commissioner Brendan Carr
Federal Communications Commission (FCC)
445 12th Street, SW
Washington, DC 20554

Re: WC Docket Nos. 17-287, 11-42, 09-197

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

We are writing to thank Commissioner Rosenworcel for her recent article on the Bustle website, “How The FCC Will Make It Harder For Domestic Violence Survivors To Get Help.”¹ We applaud her efforts, and agree with her assertion that, “for those affected by domestic violence and abuse, a phone is a life saver.” For this reason, we are writing to express our concern about several changes proposed in the FCC’s Lifeline Notice of Proposed Rulemaking and Notice of Inquiry.

As organizations representing victims of domestic violence, we know first-hand the challenges that economically vulnerable families face to maintain safe and stable housing and access to food, medical care, and basic utility services. At least half of employed victims of domestic violence lose their jobs as a result of abuse, which contributes to the role of domestic violence as a leading cause of homelessness in the United States. For 99 percent of domestic violence victims, that includes financial abuse that can leave victims facing economic insecurity and poor credit².

As Commissioner Rosenworcel asserted, the support Lifeline provides is vital, “especially for survivors of domestic violence. Without affordable access to this basic phone service, their safety could be in jeopardy. Moreover, staying connected helps them restart their lives — get a job, open a bank account, and find a place to live — free from fear and abuse.”

The FCC is proposing to remove the most popular providers of Lifeline service, wireless service providers who do not own the underlying network infrastructure. The impact of this proposal would cause around 70% of Lifeline subscribers to lose their provider of choice, with no assurance there will be other Lifeline service available. This proposal would raise the costs of service and put affordable, essential communications out of the reach of the most vulnerable members of society, including victims and survivors of domestic violence whose access to affordable communications can be a matter of life and death.

Lifeline can be literally a life-saving program for victims of domestic violence, for whom access to wireless service is critical. Victims often suffer from social isolation at the hands of their abuser and are forced to flee their residences for their own safety. A cell phone - which can be used anywhere -

¹ <https://www.bustle.com/p/how-the-fcc-will-make-it-harder-for-domestic-violence-survivors-to-get-help-9306922>

² <https://talkpoverty.org/2018/01/12/abusers-trap-victims-draining-finances/>

enables vulnerable individuals to contact emergency services, family members, health care and social service providers, and, in short, make them feel less alone and make them safer.

Affordable communications is important to all consumers, no matter where they live. We oppose the proposal to ration the Lifeline assistance by imposing a harsh cap, and we oppose the proposal to institute a lifetime limit on the receipt of Lifeline benefits. We fear a lifetime limit would also penalize individuals who may fall on hard times at different times in their life. Given the fragility of low-income household finances, and the acute need for assistance, it is critical to ensure that benefits are not arbitrarily capped or diverted away from those in need, including domestic abuse victims.

We also oppose efforts the FCC is proposing to eliminate the “free” Lifeline services that are the most popular Lifeline products in the marketplace. These prepaid wireless Lifeline services that do not have a deposit requirement, do not require a credit check, do not require a checking account or some other means to make a monthly payment, and do not have late fees are extremely important for victims of domestic violence, who are some of the most economically-fragile low-income households.

We are grateful to the FCC for the ability to provide comment on these critically important issues, and urge you to act in accord with the recommendations made above to ensure that survivors of domestic violence and other vulnerable households are able to connect with the communities in which they live and work.

Sincerely,

Allie Bones, CEO, Arizona Coalition to End Sexual and Domestic Violence

Jane Keiffer, Executive Director, Artemis Center

Canice Lighthall, Shelter Program Manager, Blackburn Center

Marta Beresin, Break the Cycle

Krista Niemczyk, California Partnership to End Domestic Violence

Susan Villilo, Executive Director, CHOICES for Victims of Domestic Violence

Sandy Ludwig, Clinton County Women's Center

Linda Sherry, Director National Priorities, Consumer Action

Liza Andrews, Connecticut Coalition Against Domestic Violence

Ashley Ritz, Council on Domestic Violence, Inc

Deborah Wilson, Executive Director, Domestic Violence Agency

Judith Earle, Executive Director, Elizabeth Buffum Chace Center

Chase Tarrier, Public Policy Coordinator, End Domestic Abuse WI

Allison Elgart, Legal Director, Equal Justice Society

Laurie Schipper, Executive Director, Iowa Coalition Against Domestic Violence (ICADV)

Lori Weinstein, CEO, Jewish Women International (JWI)

Robin Turner, Montana Coalition Against Domestic and Sexual Violence

Hilary O. Shelton, Senior Vice President for Advocacy and Policy, NAACP

Mel Wilson, National Association of Social Workers

Isaiah Wilson, National Black Justice Coalition

Ruth Glenn, President and CEO, National Coalition Against Domestic Violence

John Breyault, VP, Public Policy, Telecom & Fraud, National Consumers League

Marium Durrani, National Network to End Domestic Violence

Anne Menard, CEO, National Resource Center on Domestic Violence

Bridgette Stumpf, Executive Director, Network for Victim Recovery of DC (NVRDC)

Amanda Partington Executive Director, New Choices Inc.

Deanna Dyer, Esq., Managing Attorney, NJ Coalition to End Domestic Violence

Connie Neal, Executive Director, New York State Coalition Against Domestic Violence

Sarah Crawford Banda, NMIC

Nancy Neylon, Ohio Domestic Violence Network

Lindsay Scott, PA Coalition Against Domestic Violence

Patrick Cicero, Executive Director, Pennsylvania Utility Law Project, on behalf of our low income clients

Crystal Patterson, PPC Violence Free Network - A Program of Family Service & Children's Aid Society

Debra Gardner, Public Justice Center

Leigh Ferrin, Directing Attorney, Public Law Center

John Wesley, Director of Policy, Rhode Island Coalition Against Domestic Violence

Wendy Pollack, Sargent Shriver National Center on Poverty Law

Linda Impagliazzo, Executive Director, The Blackstone Valley Advocacy Center

Susan K. Mathias, CEO, Transitions of PA

Janet MacKay, Executive Director, Victims Resource Center

Lydia Waligorski, Public Policy Director, Violence Free Colorado

Tonia Thomas, Team Coordinator, West Virginia Coalition Against Domestic Violence

Nicole Molinaro Karaczun, Interim CEO, Women's Center & Shelter of Greater Pittsburgh

Peg Ruddy, Executive Director, Women's Resource Center