



National Association of
American **Veterans**TM

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

July 31, 2019

Marlene H. Dortch,
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: WC Dockets: 06-122 and 11-42

Dear Ms. Dortch:

As representatives for the military and veteran community, the National Association of American Veterans (NAAV) is writing today to respectfully oppose the proposal to place a cap on the federal Universal Service Fund. We are also writing to support the recommendations of other advocates asking you to pause pending further study two major changes to the Lifeline program, specifically, the recently-announced increase in the minimum service standard for mobile broadband service (from 2 GB per month to 8.75 GB per month), and the phase-down in support for voice-only Lifeline services. While there are other federal programs for veterans, only Lifeline focuses on affordability of essential voice telephone service and broadband Internet access service for low-income households, helping low-income and rural veterans afford these critical services. Unless the Commission acts to delay these harmful changes to the Lifeline program, they are scheduled to become effective December 1, 2019. Those changes will have very harmful consequences for thousands of low-income households, including households whose members include veterans, who rely on that important program.

As other filers have noted, if you move forward with changes to the Lifeline Minimum Service Standards, over 3.8 million Lifeline subscribers will be negatively impacted.¹ We agree with other filers who ask that the FCC “pause the application of the formula for increases to the data usage standard and maintain the current minimum service standards of 2 GB per month, pending evaluation of the impact of the rule in the State of the Lifeline Marketplace Report.”² We agree with the advocates who contend that this will allow the FCC to make an “informed decision regarding all of the relevant issues – including affordability, access, and consumer

¹ Joint Petition To Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, filed by CTIA, NCLC, NHMC, OCA, and UCC, on June 27, 2017 regarding dockets 11-42, 09-197, 10-90.

² Ibid

choice – while maintaining low-income consumers’ (including those low-income consumers who are veterans) ability to choose broadband data services that best meet their needs.³”

Furthermore, NAAV believes the proposed Universal Service Fund cap would have devastating consequences for millions of active service members, veterans and their families who rely on Lifeline service to access health care resources, find and keep jobs, participate in educational programs, and stay in touch with loved ones.

Imposing a cap on the Universal Service Fund would also limit access to supported programs, including Lifeline, in the future. As you know, the VA has announced that tele-health services are vital to its mission. For veterans who may suffer chronic health conditions as a result of their service to the nation, Lifeline services can help them better manage the condition outside a doctor’s office. This is most essential for older and disabled veterans and those living in rural areas and may face additional barriers to in-person visits to their doctors or who participate in other health care programs. A cap which results in denial of benefits to otherwise qualified low-income households will deprive those individuals of the important health care benefits brought about by the Lifeline program.

For these reasons, we urge the FCC to reject these punitive and unnecessary proposals. Thank you for considering our concerns.

Sincerely,



Constance A. Burns
President and CEO
NAAV, Inc.

³ Ibid