

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and)	WC Docket No. 11-42
Modernization)	
)	
Telecommunications Carriers)	WC Docket No. 09-197
Eligible for Universal Service)	
Support)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
)	

**NATIONAL LIFELINE ASSOCIATION COMMENTS ON JOINT PETITION TO PAUSE
IMPLEMENTATION OF DECEMBER 2019 LIFELINE MINIMUM SERVICE
STANDARDS PENDING FORTHCOMING MARKETPLACE STUDY**

The National Lifeline Association¹ (NaLA) respectfully submits these comments in support of the Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study filed by CTIA, the National Consumer Law Center (NCLC), National Hispanic Media Coalition (NHMC), OCA – The Asian Pacific American Advocates, and United Church of Christ, OC, Inc. (UCC OC).² There is broad support for both proposals in the Joint Petition – to pause any increases in the mobile broadband minimum service standard and retain full Lifeline support for standalone voice and voice-centric bundles – until the Commission can study the impact of such changes on access to and affordability of Lifeline services

¹ NaLA is the only industry trade group specifically focused on the Lifeline segment of the communications marketplace. It supports eligible telecommunications carriers (ETCs), distributors, Lifeline supporters and participants and partners with regulators to improve the program through education, cooperation and advocacy. See <https://www.nalalifeline.org/>.

² See Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket Nos. 11-42, 09-197, 10-90 (June 27, 2019) (Joint Petition).

for low-income consumers and report on such findings in the *State of the Lifeline Marketplace Report* due in 2021.

I. NaLA Agrees that the Commission Should Retain the Current Mobile Broadband Minimum Service Standards until It Can Consider the Impact of the New Increases on Affordability in the *State of the Lifeline Marketplace Report*

The Joint Petition's request to pause further mobile broadband minimum service standard increases and study the Lifeline marketplace already has broad support from consumer-centric public interest and civil rights groups, state regulators, conservative thinkers and industry. Freezing the current mobile broadband minimum service standard until the *State of the Lifeline Marketplace Report* is completed will allow the Commission to rationally consider the impact of an unexpected and apparently massive price increase that would be triggered by the mandated formula-derived service levels for December 2019 and later on access to and the affordability of essential communications services for low-income consumers.

A. The Joint Petition Has Broad Support from Lifeline Stakeholders

The Joint Petition's request to pause the mobile broadband minimum service standard increases and study the Lifeline marketplace enjoys broad support from a wide array of stakeholders. The Joint Petition was filed on behalf of mobile wireless Lifeline service providers by CTIA, as well as NCLC, NHMC, OCA and UCC OC on behalf of low-income consumers.³ In addition to having the support of public interest groups, civil rights organizations, and the mobile wireless industry, the National Association of State Utility Consumer Advocates (NASUCA)

³ Mobile wireless service providers serve more than 90 percent of all Lifeline subscribers. According to the USAC Lifeline Disbursement Tool, available at <https://www.usac.org/li/tools/disbursements/default.aspx> (data from July 1, 2019). The review of such status by CGM, LLC, an industry consultant, shows that nearly 93 percent of Lifeline subscribers receive wireless services.

recently adopted a Resolution finding that “the benefit to Lifeline consumers of the scheduled increase in Lifeline broadband minimum service standards cannot be determined without consideration of the impact on the availability of Lifeline broadband service and the affordability of Lifeline broadband service, particularly if the \$9.25 covers only a small fraction of the retail service cost.”⁴ Therefore, NASUCA urged the Commission to “stay and study the proposed changes in the Lifeline broadband minimum service standards, to assure that the minimum standards advance the universal service goals of providing Lifeline consumers with access to broadband services which are both of sufficient quality and affordability.”⁵

State commissions also support grant of the Joint Petition with the National Association of Regulatory Utility Commissioners (NARUC) adopting a Resolution⁶ on July 23, 2019 reminding the Commission that “[i]n the *Lifeline Modernization Order*, the FCC contemplated a gradual increase in consumer data usage and did not anticipate that the transition from the initial data allowance levels using the 2016 formula would result in a leap to a substantially higher and more costly data requirement”⁷ and warning that “[i]f the FCC allows the December 2019 broadband minimum standards to go into effect, the new standards will effectively impose a \$30 per month

⁴ National Association of State Utility Consumer Advocates, Resolution 2019-02 Urging the FCC to Preserve Lifeline Support for Voice Service and to Stay and Study the Scheduled Changes in Lifeline Minimum Services (June 20, 2019), available at <https://www.nasuca.org/nwp/wp-content/uploads/2018/11/2019-02-Final-NASUCA-Telecom-Resolution-re-Lifeline-for-Voice-Service-Min-Standards.pdf>.

⁵ *Id.*

⁶ NARUC Resolution on the Lifeline National Verifier Launch and Minimum Service Standards (July 23, 2019) (NARUC National Verifier Launch and Minimum Service Standards Resolution), available at <https://www.naruc.org/meetings-and-events/naruc-meetings-and-events/2019-summer-policy-summit/final-resolutions/>.

⁷ As noted in the Joint Petition, the Commission did not anticipate the rapid spread of unlimited mobile data plans, which impacts the formula-based calculation of the minimum service standard. *See* Joint Petition at 4.

price increase on Lifeline subscribers – an increase that low-income subscribers cannot afford.”⁸

Therefore, the Resolution urges the Commission to “freeze the broadband minimum service standards for Lifeline at the December 2018 levels – 2 GB per month/household at \$9.25 – until the FCC concludes its 2021 Lifeline Study and determines an appropriate standard based on then available data.”⁹

The request to freeze and study the impact of the minimum service standards also has received support from the conservative Free State Foundation. In a June 29, 2019 blog post, Randolph May reasoned, “Given the circumstances that exist at present, which the Commission could not have necessarily predicted at the time it devised the existing scheduled mandates, and given the pendency of the *State of the Lifeline Marketplace Report*, the petitioners’ postponement request seems reasonable, and I hope the Commission will consider it such.”¹⁰

Moreover, George Ford, Chief Economist at the Phoenix Center for Advanced Legal and Economic Public Policy Studies, recently authored a Policy Paper entitled “A Fresh Look at the Lifeline Program”¹¹ in which he determined that the, “...minimum service standards[,] are counterproductive in that [they] will increase the alleged displacement of Lifeline for regular accounts¹² and reduce the adoption of advanced telecommunications services by low-income

⁸ NARUC National Verifier Launch and Minimum Service Standards Resolution.

⁹ *Id.*

¹⁰ Randolph May, “A Reasonable Lifeline Postponement Request,” The Free State Foundation (June 29, 2019) (Free State Blog Post), *available at* <http://freestatefoundation.blogspot.com/2019/06/a-reasonable-lifeline-postponement.html>.

¹¹ George S. Ford, PhD., “Phoenix Center Policy Paper No. 55, A Fresh Look at the Lifeline Program,” Phoenix Center for Advance Legal & Economic Public Policy Studies (July 2019) (Phoenix Center Policy Paper), *available at* <http://www.phoenix-center.org/pcpp/PCPP55Final.pdf>.

¹² The main purpose of the Policy Paper is to address a fatally flawed study that erroneously suggests that nearly all Lifeline subscribers would obtain communications service even without the subsidy. *See* Phoenix Center Policy Paper at 4 (...concerns over inframarginal users displacing regular paid subscriptions underlie many of the proposals for reforming the program. In this

Americans.”¹³ Dr. Ford’s analysis found that “increases in minimum service standards encourage displacement, not reduce it. Also, raising minimum service standards is likely to raise the price for Lifeline services, thereby making service unaffordable to precisely those households the Commission seeks to target with its subsidies.”¹⁴

B. Pausing the Mobile Broadband Minimum Service Standard Increases until the State of the Lifeline Marketplace Report Is Completed Will Allow the Commission to Fulfill its Statutory Obligation to Consider Impacts on Access and Affordability

The Joint Petition appears to correctly apply the formula to calculate the mobile broadband minimum service standard as of December 1, 2019, which would require 9.5 or 9.75 GB of data per month, depending on whether one is using the order or the rule.¹⁵ However, on July 25, 2019, the Wireline Competition Bureau released a Public Notice announcing 8.75 GB as the new standard as of December 1, 2019.¹⁶ The difference does not materially impact the request for relief. As recognized by NARUC in its Resolution, prepaid mobile broadband plans with 10 GB of data typically cost \$40 per month at retail.¹⁷ NaLA provides in Attachment 1 a mobile broadband retail

POLICY PAPER, I consider the prudence of some proposed reforms by conducting an economic and empirical analysis of the Lifeline program with particular attention to the displacement of paid subscriptions by subsidized ones. My findings are at odds with both the existing (and now dated) empirical evidence, and many of the proposed reforms, including efforts to reduce reseller access to subsidies, to return to partially discounted rather than free services, and *aggressive increases in prescriptive minimum service standards*. Theory indicates that the basic-package of free service offered by resellers reduces the displacement rate while higher minimum service standards and maximum discount policies increase the displacement rate. If reducing displacement is a goal, then returning to a partially-discounted rather than free (or completely discounted) service is among the worst of all possible options.”) (emphasis added).

¹³ Phoenix Center Policy Paper at 1.

¹⁴ *Id.* at 36.

¹⁵ See Joint Petition at 4.

¹⁶ See *Wireline Competition Bureau Announces Updated Lifeline Minimum Service Standards and Indexed Budget Amount*, WC Docket No. 11-42, Public Notice, DA 19-704 (July 25, 2019).

¹⁷ NARUC National Verifier Launch and Minimum Service Standards Resolution.

price survey of nearly three dozen carriers to demonstrate that plans that include 8.75 GB or more of data typically retail for \$40 or more a month. That means an approximately \$30 per month price increase for Lifeline subscribers, if the Commission does not act to prevent the new standard from going into effect on December 1, 2019.

The Commission has not considered this price increase or its impact on access to and the affordability of communications services for Lifeline subscribers. The Joint Petition calls upon the Commission to meet its statutory obligation to do so.¹⁸ Indeed, the Court of Appeals for the D.C. Circuit, in a February 2019 decision, recognized the statutory universal service principle of affordability¹⁹ as the primary goal of the Lifeline program,²⁰ and the Commission's recognition that "access to telephone service has become crucial to full participation in our society and economy,"²¹ and vacated the 2017 Lifeline Tribal Order in part because the Commission had "ignored the substantial impact of [certain changes to the Lifeline program] on affordability and access."²² Similarly, although it is not a new rule, the formula that is set to be utilized based on the most recent usage data on December 1, 2019 is a change to the Lifeline program that will have a substantial, adverse impact on access and affordability. The Commission has not studied the potential impact of a 6.75 GB increase in the mobile broadband minimum standard on access and affordability and whether a \$30 per month price increase will be affordable for Lifeline-eligible consumers (it

¹⁸ See Joint Petition at 2; 47 U.S.C. § 254(b)(1), (3).

¹⁹ *Natn'l Lifeline Ass'n, et. al. v. FCC*, 921 F.3d 1102, 1105 (D.C. Cir. 2019).

²⁰ *Id.* at 1111 ("the Commission's long-stated primary tenets for the program are availability and affordability.")

²¹ *Id.* at 1106 (citing *MTS and WATS Market Structure; and Establishment of a Joint Board; Amendment*, Report and Order, 50 Fed. Reg. 939 (Jan. 8, 1985)).

²² *Id.*

won't),²³ or whether such a co-pay will serve as a barrier to access for consumers and program participation by service providers (it will).²⁴ Nor has the Commission considered the fact that a 2 GB mobile data plan is a robust service offering that allows Lifeline subscribers substantial access to email, websites, and Internet research that meets the needs of most subscribers to maintain communications with potential and current employers, schools and healthcare providers.²⁵ Moreover, the Commission has not considered alternatives (e.g., increasing the monthly reimbursement amount) as would be necessary to allow this change to go into effect with such a drastic potential increase in consumer prices. To comply with the Commission's statutory mandate, the new increase must be waived until the Commission can study the impact on affordability and access further in the *State of the Lifeline Marketplace Report*.

²³ See Phoenix Center Policy Paper at 13 ("As minimum service standards rise, a fully-discounted offering may no longer be feasible, raising the price of communications services (and/or devices) to low-income Americans participating in the Lifeline program.").

²⁴ As the Court of Appeals for the D.C. Circuit recognized, availability (access) and affordability are Commission-established primary tenets of the Lifeline program. See *infra* n. 16. In its 2012 Lifeline Reform Order, the Commission rejected a minimum charge for Lifeline because it was concerned that "requiring a minimum consumer charge could be burdensome for those low-income consumers who lack the ability to make such payments electronically or in person" and it "could result in current Lifeline subscribers leaving the program." *Lifeline and Link Up Reform and Modernization et. al.*, WC Docket No. 11-42 et. al., Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, ¶¶ 266-7 (2012). Further, commenters overwhelmingly opposed the Commission's proposal for a maximum discount on Lifeline in the 2017 Lifeline Report and Order and NPRM. See NaLA Reply Comments, WC Docket No. 17-287 at 16-18 (Mar. 23, 2018) (noting that nearly all commenters addressing the issue opposed a maximum discount and addressing the three supportive comments). NARUC has found that allowing the December 2019 mobile broadband minimum service standard to go into effect "will adversely impact service providers' ability to continue to participate in Lifeline and consumers' ability to afford Lifeline supported services, including veterans, seniors and those living in rural areas." NARUC National Verifier Launch and Minimum Service Standards Resolution.

²⁵ See Estimated Smart Phone Data Usage, What's a G?, https://whatsag.com/estimated-data-usage/data_usage.php (last visited July 30, 2019).

II. NaLA Agrees with the Petitioners that the Commission Should Retain Full Support for Lifeline Voice Services until It Can Consider the Impacts of a Phase-Down on Communications Access and Affordability in the *State of the Lifeline Marketplace Report*

The Joint Petition notes the “substantial support” in response to the 2017 Notice of Proposed Rulemaking (NPRM) for eliminating the phase-down in Lifeline support for standalone voice or voice-centric options for low-income consumers in all areas (not just rural areas).²⁶ The Joint Petition undersells this point. The support for retaining full support for voice service was nearly unanimous. The supporters included AARP, NAACP, several major cities, the Oklahoma, Pennsylvania, Michigan, Minnesota, Missouri, Nebraska, Florida and California public service commissions, GVNW Consulting, NASUCA, NARUC, Sacred Wind, General Communication, Inc., NTCA and WTA, the Leadership Conference on Human Rights, NaLA, Q Link and TracFone.²⁷

The supporters of retaining full support for voice services now include the petitioners and the Free State Foundation.²⁸ Moreover, NASUCA’s recent Resolution “urges the FCC to preserve

²⁶ See Joint Petition at 7.

²⁷ See AARP Comments at 15-17; California PUC Comments at 13-14; City of Boston et al. Comments at 9; City of New York Comments at 4; Florida PSC Comments at 4; GCI Comments at 2-3; Leadership Conference on Civil and Human Rights Comments at 2; Low-Income Consumer Advocates Comments at 8; Medicaid Health Plans of America Comments at 3; Michigan PSC Comments at 7; Missouri PSC Comments at 6; Minnesota Agencies Comments at 6; NAACP Comments at 2; NASUCA Comments at 20; Nebraska PSC Comments at 7; OCA – Asian Pacific American Advocates et al. Comments at 4; Oklahoma PUD Comments at 9; PA Low Income Consumer Coalition Comments at 3; TracFone Comments at 56. Q Link has supported a voice and/or broadband bundles approach that would allow a Lifeline customer to choose a voice-only option with full support. See Comments of Q link Wireless, LLC at 43-44. All references to “Comments” herein refer to the initial comments filed in response to the 2017 Lifeline NPRM in WC Docket No. 17-287 on or around February 21, 2018.

²⁸ See Free State Blog Post (“The impending diminishment in support for voice services likely will adversely impact Lifeline customers by constraining the flexibility of service providers to tailor offerings affordability to meet Lifeline customers’ demands.”).

the current Lifeline support for voice service of \$9.25 per month and stay or terminate the scheduled 2019 and future decreases to Lifeline support. Further, NARUC's recent Resolution,

urges the FCC to maintain the full \$9.25 in Lifeline support for voice services at the December 1, 2018 service levels. Moreover, the FCC should not phase-down or eliminate support for voice services as it has proposed for 2019 to 2021. Many consumers, including seniors and families with children, rely on voice services to contact first responders in time of emergency, reach social service agencies, access healthcare, and keep connected to other essential services.²⁹

A retail voice price survey of nearly three dozen prepaid wireless carriers is included as Attachment 2 and shows that consumers must pay an average of \$15-\$20 for a plan that includes 1,000 minutes. NARUC recently found that allowing the planned reduction in voice support to go into effect would "adversely impact service providers' ability to continue to participate in Lifeline and consumers' ability to afford Lifeline supported services, including veterans, seniors and those living in rural areas."³⁰ Therefore, reducing the reimbursement from \$9.25 to \$7.25 will force price increases on consumers and result in service providers abandoning the active distribution of Lifeline in states where no additional state subsidy is available, and combined with the mobile broadband increases, may result in many Lifeline providers going out of business altogether. Allowing the planned reduction in support for mobile voice services to go into effect is untenable, as it would have a substantial, adverse impact on access and affordability of voice communications for low-income consumers. While NaLA agrees with CTIA that the Commission should not require providers to offer standalone voice service offerings, the Commission should continue to provide

²⁹ NARUC National Verifier Launch and Minimum Service Standards Resolution. While the Commission in 2016 may have assumed that mobile voice services would transition to Voice over LTE or over-the-top applications, that has not happened on a large scale and, as NARUC emphasizes, mobile voice service remains important for many low-income Americans.

³⁰ *Id.*

full reimbursement where the provider seeks to offer it and low-income consumers want standalone voice or voice-dominant bundled options.

III. Conclusion

Once again, the Lifeline program is at a turning point, and the low-income consumers who depend on the Lifeline program for affordable access to mobile voice and broadband are threatened with the substantial and irreparable harm of de-enrollment and disconnection later this year, if the Commission does not act quickly to grant the Joint Petition. Because service providers cannot plan properly in the midst of the current regulatory uncertainty and may need to notify consumers of plan changes or service discontinuance, and state commissions require as much as 60 days' notice, NaLA respectfully urges the Commission to grant the Joint Petition expeditiously.

Respectfully submitted,



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ATTACHMENT 1

Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
Affinity Cellular	\$35 for <u>5 GB</u>	Unlimited	Overage charge of \$.03 per MB
	\$50 for <u>10 GB</u>	Unlimited	
Air Voice Wireless	\$30 for <u>6 GB</u>	Unlimited	First 3 GB are high speed, subsequent 3 GB are reduced speed
	\$50 for <u>unlimited</u>	Unlimited	First 5 GB are high speed, subsequent data usage is at reduced speed
Boom! Mobile	\$49.99 for <u>10 GB</u>	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$69.99 for <u>20 GB</u>	Unlimited	
	\$39.99 for <u>5 GB</u>	Unlimited	
Boost Mobile	\$50 for <u>unlimited data</u> and a 12 GB hotspot	Unlimited	If congested, customers who use more than 35 GB of data in a billing cycle will be de-prioritized
	\$35 for <u>3 GB</u>	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G. Option of adding more data: 1 GB for \$5/mo or 3 GB for \$10/mo
Consumer Cellular	\$30 for <u>10 GB</u> (but must purchase at least 250 minutes for \$15 as well)	≥ 250 (text unlimited)	Once monthly data allowance is reached, the plan will automatically upgrade to the <u>20 GB</u> plan for \$40. If a customer exceeds that 20 GB limit, they will be charged \$5 for each extra GB
Credo	\$65 for <u>20 GB</u>	Unlimited	Once monthly data allowance is reached, speeds are reduced
	\$60 for <u>6 GB</u>	Unlimited	
Cricket	\$55 for <u>unlimited data</u> (\$50 with auto pay)	Unlimited	During congestion, customers who have used more than 22 GB in that month may experience slower speeds
	\$40 for <u>5 GB</u> (\$35 with auto pay)	Unlimited	Speeds reduced to 128 Kbps max after exceeding monthly allowance
	\$35 for <u>10 GB</u> on "Data Only" plan	No cellular network voice support	Plan not compatible with voice-and-data rate plans or voice-and-data extras

Plans do not include a free handset.

Current as of July 19, 2019

Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
Eco Mobile	\$60 for <u>8 GB</u>	Unlimited	Once monthly data allowance is reached, speeds are reduced
	\$50 for <u>6 GB</u>	Unlimited	
	\$40 for <u>4 GB</u>	Unlimited	
Good 2 Go Mobile	\$40 for <u>10 GB</u>	Unlimited	Speed reduces after high-speed data allowance to maximum of 128 kbps.
	\$30 for <u>5 GB</u>	Unlimited	
GoSmart	\$45 for <u>20 GB</u> of 3G	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$35 for <u>5 GB</u> (\$30 with auto pay, requires credit or debit card) of 3G	Unlimited	
H2O	\$60 for <u>10 GB</u>	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
Jolt Mobile	\$40 for <u>4 GB</u>	Unlimited	Speed reduced for exceeding data allotment
	\$55 for <u>5 GB</u>	Unlimited	
Kroger Wireless	\$45 for <u>20 GB</u>	Unlimited	Once monthly data allowance is reached, speeds are reduced to 64 kbps
	\$35 for <u>5 GB</u>	Unlimited	
Metro PCS	\$40 for <u>10 GB</u>	Unlimited	If congested, customers who use more than 35 GB of data in a billing cycle will be de-prioritized
Mint Mobile	\$25 for <u>12 GB</u> (12 month plan, must pay \$300 up front)	Unlimited	Once monthly data allowance is reached, speeds reduced.
	\$20 for <u>8 GB</u> (12 month plan, must pay \$240 up front)	Unlimited	
	\$25 for <u>12 GB</u> (3 month intro offer, must pay \$75 up front, can keep this price if prepay for 12 months; regular price is \$45/mo)	Unlimited	
	\$20 for <u>8 GB</u> (3 month intro offer, must pay \$50 up front, can keep this price if renew for 12 months; regular price is \$35/mo)	Unlimited	

Plans do not include a free handset.

Current as of July 19, 2019

Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
Net10	\$50 for <u>10 GB</u> (\$45 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$40 for <u>8 GB</u> (\$36 with auto pay, requires credit card)	Unlimited	
Page Plus Cellular	\$55 for <u>unlimited data</u> (\$50 with auto pay, requires credit or debit card)	Unlimited	At 60 GB, the company reserves the right to review accounts for usage violations
	\$39.95 for <u>8 GB</u> (\$36 with auto pay, requires credit or debit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
PureTalk	\$45 for <u>10 GB</u>	Unlimited	If users exceed data allotment, their speed will be reduced to 128 kbps (no overage fees)
Ready Mobile	\$90 for <u>10 GB</u>	Unlimited	Overage charge of \$.015/mb
	\$50 for <u>4 GB</u>	Unlimited	
	\$40 for <u>2 GB</u>	Unlimited	
Red Pocket Mobile	\$45 for <u>10 GB</u> (\$40 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$35 for <u>5 GB</u> (\$30 with auto pay, requires credit card)	Unlimited	
	\$65 for <u>20 GB</u> (\$60 with auto pay, requires credit card)	Unlimited	
Republic Wireless	\$25 for <u>2 GB</u> on monthly plan (\$250 for <u>2 GB</u> on yearly plan, \$20.83/mo)	Unlimited	Additional 1 GB of data per month for \$5, up to 15 GB

Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
Simple Mobile	\$40 for <u>15 GB</u> until 09/30/19, \$40 for <u>10 GB</u> after that date (\$37.50 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
Straight Talk	\$45 for <u>25 GB</u> for 1 month plan (\$44 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$495 for <u>25 GB</u> /mo for 1 year (\$41.25/mo)	Unlimited	
Telcel	\$55 for <u>10 GB</u> (\$49.50 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
Total Wireless	\$50 for <u>25 GB</u> (\$47.50 with auto pay, requires credit card)	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$35 for <u>5 GB</u> (\$33.20 with auto pay, requires credit card)	Unlimited	
TracFone Wireless	\$30 for <u>3 GB</u>	Unlimited	"Data and text-only cards do not have service days and do not triple."
Ultra Mobile	\$29 for 5 GB (if purchasing 3 month	Unlimited	Once monthly data allowance is reached, speeds are

Plans do not include a free handset.

Current as of July 19, 2019

Mobile Broadband Retail Price Survey

Provider	Monthly Price for Data	# of Voice Minutes Included	Conditions
	plan, \$29 for 6 GB)		reduced to 128 kbps (or lower for heavy data users)
	\$49 for <u>50 GB</u>	Unlimited	
Virgin Mobile	\$45 for <u>10 GB</u>	Unlimited	Unlimited voice and data are on-network only. Once monthly data allowance is reached, speeds reduced to 2G
Walmart Family Mobile	\$39.88 for <u>14 GB</u>	Unlimited	Once monthly data allowance is reached, speeds reduced to 2G
	\$29.88 for <u>4 GB</u>	Unlimited	
Wing	\$34 for <u>3 GB</u>	Unlimited	Once monthly data allowance is reached, CDMA customers will see their speeds reduced to 2G and GSM customers will not be able to use any data
Zing PCS	\$69 for <u>8 GB</u>	Unlimited	Once monthly data allowance is reached, speeds are reduced
	\$50 for <u>5 GB</u>	Unlimited	

ATTACHMENT 2

Mobile Voice Retail Price Survey

Plan	Minutes	Cost / month	Data	Conditions
Affinity Cellular	1500	\$20	1 GB	
AT&T	Unlimited	\$30 (\$25 with auto pay, credit, debit, or echeck required)	0	
Boom Mobile	1000	\$19.99	250 MB	
Boost Mobile	Unlimited	\$35	3 GB	
Consumer Cellular	Unlimited	\$20	0	
Credo	Unlimited	\$30	1 GB	
Cricket	Unlimited	\$25	0	
ECO Mobile	1000	\$50 (5 cents per minute)	0	All refills expire in 30 days; remaining balance recycled if account is refilled within 30 days
ECO Mobile	Unlimited	\$20	100 MB	Available for GSM and Sprint only
Good2Go	Unlimited	\$20 (\$15 with auto pay, credit or debit card required)	0	
GoSmart	Unlimited	\$15	250 MB	
h2o	Unlimited	\$20	500 MB	
Jolt Mobile	Unlimited	\$25	2 GB	
Jolt Mobile	1000	\$60 (6 cents per minute)	120 MB	
MetroPCS	Unlimited	\$30	2 GB	
Mint Mobile	Unlimited	\$15 intro plan (regular price is \$25)	3 GB	Minimum plan length is for 3 months, must pay full length up front
Net10	1000 (1250 with auto pay, credit card required)	\$25	0	No carry over benefit
Net10	Unlimited	\$20	1 GB	Once monthly data allowance is met, speeds reduced to 2G
PureTalk	Unlimited	\$20	500 MB	Once monthly data allowance is met, speeds reduced to 128 kbps

Plans do not include a free handset.
Current as of July 19, 2019

Mobile Voice Retail Price Survey

Plan	Minutes	Cost / month	Data	Conditions
Ready Mobile	Unlimited	\$30	1 GB	Has fair use policy: 5000 Voice, 5000 Text. Overage rate is \$.015/min, \$.002/text, and \$.015/MB
Red Pocket Mobile	1000	\$15	1 GB	
Republic Wireless	Unlimited	\$15	0	
Simple Mobile	Unlimited	\$25	1 GB	Once monthly data allowance is met, speeds reduced to 2G
StraightTalk	Unlimited	\$35	3 GB	Once monthly data allowance is met, speeds reduced to 2G
Telcel	Unlimited	\$25	0	
Ting	1000	\$24	0	No text included
T-Mobile Pay As You Go	1000	\$100 (10 cents per minute)	0	Service available for 30 days after activation/refill/conversion; then account is suspended.
T-Mobile Simply Prepaid	Unlimited	\$40	10 GB	
TracFone	1000	\$159.99 (365 service days)	0	
Ultra Mobile	Unlimited	\$19	1 GB	
Virgin Mobile	Unlimited	\$35	5 GB	Once monthly data allowance is met, speeds reduced to 2G
Walmart Family Mobile	Unlimited	\$24.88	2 GB	Once monthly data allowance is met, speeds reduced to 2G.
Wing	Unlimited	\$12 (flip phone plan)	128 MB	Data is 3G only; available only for 3G CDMA phones
Zing Wireless	Unlimited	\$30	0	

Plans do not include a free handset.
Current as of July 19, 2019