

Mr. Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

August 10, 2018

Re: Emergency Petition of Q Link Wireless, LLC For an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier, WC Docket Nos. 17-287, 11-42, 09-197.

Dear Chairman Pai:

The undersigned Public Interest Commenters (Commenters) submit this letter in response to the Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier.<sup>1</sup> Commenters are long-time supporters of the Lifeline program and its modernization. Transparency, trust, integrity, and ease-of-use must be built into the Lifeline program to maximize Lifeline's impact in bridging the digital divide. The Federal Communications Commission (FCC) and the Universal Service Administrative Company (USAC) should ensure that any program changes exemplify those values.

Q Link's petition shows that the National Verifier is potentially heading in the wrong direction. As an initial matter, the National Verifier should be rolled out as quickly as possible and in a manner that protects highly sensitive personal information. However, Commenters are concerned that failure to use the most modern technology that is simplest for consumers will harm the Lifeline program and the implementation of the National Verifier, and exacerbate the digital divide.

Commenters have two concerns with the current roll-out of the new National Verifier scheme. First, USAC's lack of transparency around its decision to remove the application programming interface (API) functionality from the National Verifier is troubling. USAC's first draft plan included a carrier-National Verifier API.<sup>2</sup> The July 2017 update, however, stated there "will be

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<sup>1</sup> See Emergency Petition of Q Link Wireless, LLC for an Order Directing the Universal Service Administrative Company to Implement Machine-to-Machine Interfaces for the National Verifier, WC Docket Nos. 17-287, 11-42, 09-197 (July 5, 2018).

<sup>2</sup> See USAC, Draft Lifeline National Verifier Plan (November 30, 2016), [https://www.usac.org/\\_res/documents/li/pdf/nv/2016-Nov-Draft-National-Verifier-Plan%20-%20Copy.pdf](https://www.usac.org/_res/documents/li/pdf/nv/2016-Nov-Draft-National-Verifier-Plan%20-%20Copy.pdf) (slide 32).

no API integration available to the National Verifier.”<sup>3</sup> Neither USAC nor the FCC has provided an explanation for removing the carrier–National Verifier API. Transparency is vital to ensuring trust in and use of the Lifeline program and in ensuring that the national verifier will be effective. Without public disclosure of the rationale for removing the API functionality, the public cannot grasp why the agency eliminated a basic technical tool from the National Verifier, which has led to speculation and confusion. The lack of explanation also makes it difficult for consumer advocates to assess the decision-making process and the impact on low-income households who rely on Lifeline, and to assist USAC and the Commission in ensuring a successful program.

Second, USAC has not made clear if there will be consumer (low-income applicant) testing of the consumer portal prior to the hard launch. User testing of the consumer portal prior to launch is necessary to ensure that USAC identifies problems early in the process in time for a smooth roll-out at the end of the year. Low-income consumers have different needs and interact with the portals differently than the carrier user group. Rolling out a product with technical errors will only jeopardize the National Verifier’s effectiveness.

Generally, all Lifeline applicants should experience an effective and convenient application process, regardless of whether they apply via the provider or USAC. Because there are limited resources available to publicize the USAC Lifeline portal, many Lifeline applicants will likely apply for Lifeline after seeing or hearing marketing from a current Lifeline provider. Given that large numbers of Lifeline consumers will learn of and apply for Lifeline after interacting with a provider, and Lifeline consumers will necessarily have a customer relationship with a provider to obtain service, providers must be able to interface with the National Verifier in the most efficient and effective means possible.

Commenters support an interface that will clearly and easily direct consumers to the USAC eligibility verifier and easily redirect consumers back to the provider of their choice once their eligibility has been verified. For example, through an API, many commercial sites easily send consumers from their own web sites to pay for products using PayPal and then send consumers back to the original commercial web site.

The current implementation plan appears to interfere with a smooth experience for applicants. There is no apparent reason to avoid using APIs in the eligibility verifier, and the FCC and USAC have revealed none. Other agencies have successfully implemented APIs: the Center for Medicare and Medicaid Services and the Department of Veterans Affairs created an API that

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<sup>3</sup> See USAC, Lifeline National Verifier Plan (July 2017), [https://www.usac.org/\\_res/documents/li/pdf/nv/Draft-National-Verifier-Plan.pdf](https://www.usac.org/_res/documents/li/pdf/nv/Draft-National-Verifier-Plan.pdf) (slide 37).

empowers Medicare beneficiaries to grant third-party developers access to their claims data.<sup>4</sup> If APIs can be used to transmit sensitive medical information, they could be used for the Lifeline program.

If consumers can easily transition between a provider web site and the USAC web site, it will be easy for the National Verifier portal to clearly inform consumers that they have choices among Lifeline providers and encourage them to shop for the provider that best meets their needs. A strength of the current Lifeline program is that it leverages marketplace competition. Consumers should be well-informed about the range of carriers available to them, allowing them to find the plan most suited to their needs.

Commenters urge the Commission to consider the above concerns and recommendations. The Lifeline program is essential to ensuring that low-income Americans remain connected in society. An overly cumbersome enrollment system threatens the integrity of Lifeline and risks deterring eligible individuals from enrolling altogether.

Sincerely,

New America's Open Technology Institute  
Access Humboldt  
Benton Foundation  
Center for Rural Strategies  
Common Cause  
Consumers Union  
Electronic Frontier Foundation  
Free Press  
NAACP  
National Consumers League  
National Digital Inclusion Alliance  
National Hispanic Media Coalition  
Native Public Media  
Public Knowledge  
The Greenlining Institute  
United Church of Christ, OC Inc.

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<sup>4</sup> Shannon Sartin, *The Blue Button API*, U.S. Digital Service (Mar. 6, 2018), <https://medium.com/the-u-s-digital-service/blue-button-api-c1b47ff8c464>.