

August 15, 2019

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

Re: WC Docket: 11-42

Dear Ms. Dortch,

On behalf of our nation's veterans, we write to express concern with recent proposals to alter the Lifeline program. Specifically, we echo the concerns outlined in the filings from other advocates, Consumer Action and the Consumer Federation of America, and the filing from the National Association of American Veterans (NAAV), asking you to pause two major changes to the Lifeline program:

1. 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
2. The phase-down in support for voice-only Lifeline services.

We, the undersigned groups providing services to veterans including housing counseling, credit counseling, asset development, workforce development, case management and advocacy services, agree with our community partner Consumer Action's assertion that, "allowing these changes to go into effect would restrict eligible low-income consumers' access to, and undermine the affordability of, Lifeline broadband and voice service offerings, to the detriment of the program and the millions of consumers it serves."<sup>1</sup>

As NAAV said in its filing, "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."<sup>2</sup> Our concern is that millions of veterans are among the low-income consumers who benefit from Lifeline.

We know that veterans can benefit—and should continue to benefit—from the Lifeline program. Poverty is a problem for many of our nation's former service members. For example, almost 1.4 million veterans live in households that participate in SNAP, according to analysis of data from the Census Bureau's American Community Survey.<sup>3</sup>

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<sup>1</sup> Letter from Consumer Action and Consumer Federation of America, FCC WC Docket 11-42, filed on July 30, 2019.

<sup>2</sup> Letter from Constance Burns, National Association of American Veterans, FCC WC Docket 11-42, filed on July 31, 2019

<sup>3</sup> Center for Budget and Policy Priorities report, SNAP Helps Almost 1.4 Million Low-Income Veterans, Including Thousands in Every State, published November 8, 2018

As advocates for veterans, we want to also assert our support for the Lifeline program. For low-income veterans, who may be unemployed; working in low-wage jobs; or have disabilities, these veterans need to participate and have access to the Lifeline program.

Lifeline helps veterans manage chronic health conditions at home. Veterans often face difficult re-entry—into civilian life and turn to support hotlines to get their questions answered and to connect with other veterans. Low-income veterans rely on Lifeline so that they call and ask for help.

Lifeline increases access to veteran employment programs. Seventy-four percent of Lifeline subscribers enjoy broadband access on their smartphone or computer—allowing veterans to access online job boards and other online resources to help find work when they return home. Without affordable phone and broadband service, veterans cannot set up phone and in-person interviews or receive the much-anticipated call or email that they got the job.

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 voice and broadband services, regardless of where they live and their income.

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