

**Before the
Federal Communications Commission**

In the Matter of)	
)	
Bridging the Digital Divide for Low-Income)	WC Docket No. 17-287
Consumers)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal)	WC Docket No. 09-197
Service Support)	

**Comments
Missouri Public Service Commission**

The Missouri Public Service Commission (“Missouri Commission”) submits comments in response to the FCC’s Public Notice regarding TracFone’s Lifeline “units per month” proposal.¹ TracFone’s renewed motion requests permission to comply with the minimum Lifeline service standards by providing Lifeline customers with a specified quantity of “units” for use each month.² The Missouri Commission supports TracFone’s proposal including the offer to conduct a market test.

TracFone’s proposal seeks an FCC ruling allowing a company to comply with Lifeline’s minimum service standards by providing a specified quantity of units per month. The new updated minimum Lifeline service standards set to go into effect December 1, 2018, will be 1,000 minutes for voice and 2 GB for mobile broadband service.³ TracFone proposes to meet

¹ Public Notice; Wireline Competition Bureau Seeks Comment on TracFone Renewed Motion for Declaratory Ruling or for Waiver for the Purpose of Conducting a Market Test of Consumer Demand for Lifeline Service Offerings; WC Docket Nos. 11-42, 09-197, 17-287; FCC DA 18-794; released July 31, 2018.

² FCC rule 47 CFR § 54.408(a)(1) defines “minimum service standard” as “[t]he level of service which an eligible telecommunications carrier must provide to an end user in order to receive the Lifeline support amount.”

³ Public Notice: Wireline Competition Bureau Announces Updated Lifeline Minimum Service Standards and Indexed Budget Amount; WC Docket No. 11-42; DA 18-739; released July 18, 2018.

these standards by offering Lifeline customers 2,000 units per month whereby one unit equals one minute of voice service or one MB of mobile broadband service.

The Missouri Commission filed comments supporting TracFone's initial proposal.⁴ TracFone's proposal may simplify program requirements for ETCs by giving companies greater flexibility in offering a plan to meet Lifeline's minimum standards. This flexibility is needed because, as an example, Missouri presently is experiencing more companies leaving the Lifeline program than entering it.⁵ TracFone's proposal may remedy this scenario by encouraging existing ETCs to remain in the Lifeline program as well as by encouraging new companies to join the program. Consumers may also benefit through greater choices and options in Lifeline service plans.

The Missouri Commission is submitting additional comments primarily because TracFone's renewed motion suggests if the FCC maintains its strict compliance approach to minimum Lifeline service standards then TracFone, as well as other companies, may no longer offer voice service with broadband service.⁶ The prospect of wireless Lifeline providers solely offering cell phones limited to data usage without any voice service is troubling. TracFone's units proposal appears to be a reasonable balance of complying with the FCC's minimum Lifeline service standards and ensuring Lifeline customers have the capability to make and receive voice calls.

⁴ Comments of the Missouri Public Service Commission; WC Dockets 17-287, 11-42, 09-197, filed January 23, 2018 (Missouri's Comments).

⁵ As noted in Missouri's Comments, in the last five years, seven companies have relinquished ETC status and four companies have applied for ETC status. As an update, the number of companies relinquishing ETC status is expected to soon grow to eight companies. In addition, it should be pointed out one of the four new ETCs has yet to offer Lifeline service after having ETC status for several years.

⁶ TracFone's Renewed Motion for Declaratory Ruling or for Waiver for the Purpose of Conducting a Market Test of Consumer Demand for Lifeline Service Offerings; WC Docket Nos. 17-287, 11-42, 09-197; filed July 25, 2018; pages 4-5.

The Missouri Commission is concerned about efforts to remove voice service from the Lifeline program. As the FCC’s website notes, “Since 1985, the Lifeline program has provided a discount on phone service for qualifying low-income consumers to ensure that all Americans have the opportunities and security that phone service brings, including being able to connect to jobs, family and emergency services.”⁷ However, the FCC permits certain ETCs eligible to receive high-cost support to not offer Lifeline voice service in certain counties.⁸ In addition, the FCC has indicated intentions to phase-out federal Lifeline support for voice service.⁹ While it is a laudable effort to expand Lifeline to broadband services, the Missouri Commission questions the ability of broadband service “to ensure that all Americans have the opportunities and security that phone service brings”. The Missouri Commission appreciates the FCC’s recent effort to reconsider phasing-out federal Lifeline support for voice service.¹⁰

An important component of TracFone’s offer is to collect and gather information about Lifeline consumers’ preferences and needs. TracFone’s offer to conduct a market test is reasonable. The type of information TracFone proposes to collect will be extremely useful in decisions relating to whether voice service is important to Lifeline subscribers and whether efforts should be made to maintain voice service availability within the Lifeline program. If the FCC elects to allow TracFone to conduct a market test, the Missouri Commission welcomes the opportunity to help this effort.

⁷ See: <https://www.fcc.gov/general/lifeline-program-low-income-consumers>.

⁸ Public Notice; Wireline Competition Bureau Announces Counties Where Conditional Forbearance from the Lifeline Voice Obligation Applies; WC Docket No. 11-42; DA 18-759; released July 23, 2018.

⁹ Third Report and Order, Further Report and Order, and Order on Reconsideration; WC Docket Nos. 11-42, 09-197, 10-90; FCC 16-38; released April 27, 2016; ¶117. Reductions in Lifeline support for voice service are scheduled to begin December 1, 2019 until it is totally eliminated by December 1, 2021.

¹⁰ Most, if not all, state commissions support maintaining federal Lifeline support for voice service. For example see prior comments submitted by Michigan, Minnesota, Florida, Nebraska, Oklahoma, California and NARUC.

Respectfully submitted,

A handwritten signature in black ink that reads "John Van Eschen". The signature is fluid and cursive, with the first name "John" and last name "Eschen" being clearly legible, and "Van" written in a smaller, more connected script.

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