

June 1, 2015

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

**Re: WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization.**

Dear Ms. Dortch:

On May 28, Edyael Casaperalta, Coordinator of the Rural Broadband Policy Group (“RBPG”) met with Rebekah Goodheart, Legal Advisor to Commissioner Mignon Clyburn to discuss the importance of broadband access for rural youth and encourage the Federal Communications Commission (“Commission”) to include broadband service in the Lifeline Program.

Although there has been progress in broadband accessibility across the country, the digital divide persists and disproportionately affects rural, Native, and low-income Americans. The most recent Broadband Progress Report found that over half of rural Americans and nearly two-thirds of Americans living in Tribal lands lack access to advanced broadband service.<sup>1</sup> In 2011, the Center for Rural Strategies conducted a study about what happens to rural communities without broadband access. The study found that while broadband access does not guarantee prosperity, not having it guarantees communities will not prosper.<sup>2</sup> Today, that finding is more relevant than ever.

**The Commission Should Include Broadband Service in the Lifeline Program.**

Broadband access has become an existential question for rural America. Because broadband impacts every aspect of our economy and society, obtaining access to the service is a critical issue about planning for the next generation. Undoubtedly, the internet is an invaluable tool for everyone, but for people in rural America, it can be a lifeline to education, employment, information, improving our communities, and sharing our stories. RBPG commends the achievements of the Lifeline program in bringing wired and wireless telephone service to low-income rural Americans, and supports a Lifeline program that also offers broadband service. The internet is a powerful tool to lift people out of poverty and transform our communities, and RBPG believes Lifeline internet would go a long way to help rural, Native, and low-income Americans.

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<sup>1</sup> *2015 Broadband Progress Report*, Federal Communications Commission. Retrieved from <https://www.fcc.gov/reports/2015-broadband-progress-report>

<sup>2</sup> Strover, S. (Ed.). (2011). *Scholars’ Roundtable: The Effects of Expanding Broadband to Rural Areas*. Published by the Center for Rural Strategies. Retrieved from [www.ruralstrategies.org/sites/all/files/Broadband\\_Investment.pdf](http://www.ruralstrategies.org/sites/all/files/Broadband_Investment.pdf)

## **YouthBuild Rural Caucus Lifeline Internet Recommendations.**

This March, YouthBuild USA’s Rural and Native Initiative<sup>3</sup> brought together 21 participants from YouthBuild programs located in rural communities across nine states to the YouthBuild Rural Caucus (“Rural Caucus”). The participants talked about the challenges their rural communities face, and discussed a vision of wellness and opportunity for their communities. A brief survey of the participants demonstrated the digital divide rural, Native, and low-income youth face. Only 13 out of the 21 Rural Caucus participants have Internet access at home, 7 access the service at the public library, and 19 at YouthBuild or, occasionally, on their phone. All of the participants face difficult economic hardship and some even face homelessness. Next to availability, cost is the largest obstacle these young people face in accessing broadband service.

Sharell Harmon, a Rural Caucus participant and single mother of three from Elkins, West Virginia, is a Lifeline telephone recipient. Sharell uses her Lifeline wireless phone to communicate with her children’s daycare, social workers, and employers. She is grateful the Commission created a program that helps in her daily life and encourages the Commission to “clone” the program for broadband service. Currently, Sharell cannot afford Internet access at home because her financial situation requires her to prioritize rent, utilities, and groceries. Cost is Sharell’s number one barrier to getting broadband, and she believes a Lifeline Internet program would allow many youth like her to take classes online and pursue their professional goals. Too many low-income youth like Sharell are missing out on opportunities because they cannot afford broadband service.

Sharell was featured on the front page of the New York Times on May 28, where she stated that “she needs the internet to be fully connected and has struggled to pay her broadband bill.” She said, “Everything is online these days...I take classes online, do my schoolwork. My kids play math and phonics games.”<sup>4</sup> Sharell recently spoke at a panel before Congressional staff in support of including broadband service in the Lifeline program. For video of her remarks, please go to the following address: <https://www.youtube.com/watch?v=cgBYrZcezUY>

Ms. Casaperalta presented a document outlining recommendations YouthBuild Rural Caucus participants developed for a Lifeline program that supports access to affordable internet. The recommendations include: recipient choice in wireless and wired services, preventing data caps, funding digital literacy, no restrictions on websites, protecting recipient’s privacy, funding

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<sup>3</sup> YouthBuild USA is a national education and job-training model where low-income young people ages 16 to 24 work full-time toward their General Education Development Certificate (“GED”) or high school diplomas while learning job skills by building affordable housing in their communities. At the program’s completion, participants are placed in college, jobs, or both. YouthBuild is a member of the Rural Broadband Policy Group.

<sup>4</sup> Ruiz, R.R. (2015, May 28). F.C.C. Chief Seeks Broadband Plan to Aid the Poor. *The New York Times*. Retrieved from <http://www.nytimes.com/2015/05/28/business/fcc-chief-seeks-broadband-plan-to-aid-the-poor.html>.

hardware, collaborating with state and federal agencies, and maintaining the eligibility requirements of the telephone program. She asked Ms. Goodheart to consider the Rural Caucus' recommendations and encouraged the Commission to include broadband service in the Lifeline program. Please see the YouthBuild Rural Caucus Lifeline Recommendations document attached.

The Rural Broadband Policy Group looks forward to collaborating with the Commission as the Lifeline program evolves. We are thankful for the opportunity to share our perspective with the Commission about how Lifeline can best serve low-income, rural, and Native communities, and ensure the promise of the internet reaches rural youth.

Respectfully submitted,

/s/ Edyael Casaperalta

*Coordinator*

RURAL BROADBAND POLICY GROUP

*Internet Rights Fellow*

PUBLIC KNOWLEDGE