



June 5, 2015

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

Re: Ex Parte letter – Prepaid Wireless Retail, LLC (dba, Odin Mobile) (WC
Docket No. 09-197 and 11-42)

Dear Secretary Dortch:

The Commission has announced that it will consider an item to modernize Lifeline at its June open meeting. Odin Mobile urges the Commission to consider carefully how to optimize the impact of the program for people with disabilities.

Crucially, the Commission must recognize that while Lifeline is a service, that service must be accessed through equipment, and that in order for people with disabilities to take advantage of Lifeline, the Commission must consider the accessibility and affordability of that equipment. For people with disabilities, equipment and service are two sides of the same coin.

The unfortunate and unintended consequences of failing to consider the accessibility and affordability of equipment is apparent from the current Lifeline program. Wireless eligible telecommunications carriers provide Lifeline recipients free feature phones that are not accessible. Consequently, millions of blind Americans cannot benefit fully from wireless Lifeline service.

The Commission, in its National Broadband Plan (“NBP”), recognized that both service and equipment are crucial to broadband adoption by people with disabilities. The NBP explained that “[d]evices often are not designed to be accessible for people with disabilities,” and “[a]ssistive technologies are expensive (Braille displays, for example, can cost between \$3,500 and \$15,000).” *See* NBP at 169. Further, in the Omnibus Broadband Initiative Working Paper Series, the authors concluded that “[t]he government also should ensure that those who cannot afford AT and who do not have access to AT through existing programs have federal support.” *See* OBI Working Paper Series No. 2 at 17. The Working Paper further provided that “the FCC issue an NPRM on whether to establish separate subsidy programs to fund broadband services and AT under the TRS program.” *Id.*

The Commission can and should address access to broadband service by people with disabilities, in conjunction with the necessary equipment, within the Lifeline program itself. The potential benefits of Lifeline to disabled individuals is far too great to kick the can down the road. **Lifeline could have a tremendous impact on broadband adoption by people with**

disabilities by adding just one eligibility criteria to the Lifeline program. This additional basis for eligibility would provide that disabled individuals who receive communications equipment from a State equipment distribution program are eligible for Lifeline. The additional eligibility criteria, however, would be extended only to residents of states that expand their equipment programs from voice to include internet, and that cover all major disability groups (most states cover only hearing and speech disabilities, although the California and Texas programs are notable exceptions).

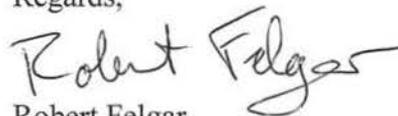
As an incentive to the states, they would be allowed to adopt income-based eligibility criteria for their equipment programs that were more expansive than those of the federal lifeline program (this is already the case in most states). Thus, by updating their equipment programs to include Internet and all disability groups, a greater number of their disabled residents would qualify for Lifeline. In addition, it would make the state equipment programs more effective because low income individuals who receive the state subsidized equipment would not stop using the equipment due to lack of affordability of the service.

As discussed above, in the OBI Working Paper Series No. 2, it was suggested that AT should be funded through TRS because the state equipment programs only cover voice. Specifically, the working paper provides that “[federal] [f]unding is needed because, as mentioned earlier, while most states fund AT used to access the telephone system, only one state—Missouri— funds AT used for Internet access.” By leveraging Lifeline as proposed above, the Commission would incentivize the states to expand their programs to fund AT for Internet access and would not have to expand TRS.

Finally, Odin Mobile urges the Commission to approve its compliance plan, which has been pending before the Commission for two-and-a-half years. Odin Mobile is dedicated to serving individuals with disabilities and can apply its considerable experience and expertise to help ensure that individuals with disabilities have the necessary equipment to take advantage of a promising federal program.

Odin Mobile congratulates the Commission for its decision to modernize the Lifeline program.

Regards,



Robert Felgar
General Manager

