

August 3, 2015

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

**Re: Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund, WC Docket Nos. 11-42, 09-197, 10-90; Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, Memorandum Opinion and Order, FCC 15-71 (rel. July 22, 2015).**

Dear Ms. Dortch:

On July 30, 2015, Phillip Berenbroick, Kristine DeBry, Meredith Rose, and Foster Dobry of Public Knowledge met with Trent Harkrader, Ryan Palmer, Radhika Karmarkar, Garnet Hanley, Christopher Cook, and Jodie Griffin of the Federal Communications Commission’s (“Commission”) Wireline Competition Bureau to discuss matters in the above-captioned proceeding.

The Commission’s proposed reforms to the Lifeline program in the *Second Further Notice of Proposed Rulemaking* (“*FNPRM*”) would modernize the program and expand it to support broadband service.<sup>1</sup> The *FNPRM* rightly recognized that, consistent with the Commission’s statutory mandate, the Lifeline program must evolve to reflect the realities of the 21st Century communications marketplace.<sup>2</sup> Further, the Commission correctly explained that broadband access is essential to participate in modern American society, and that without access, low-income Americans risk being left even further behind.<sup>3</sup>

Public Knowledge expressed support for the Commission’s proposal to expand Lifeline to support broadband service. Additionally, Public Knowledge explained that it was critical for Lifeline to continue to support standalone voice service. In expanding Lifeline to support broadband, the Commission should not rescind support for voice

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<sup>1</sup> Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund; WC Docket Nos. 11-42, 09-197, 10-90; *Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order*; 30 FCC Rcd 7818, 7824-25, 7827 ¶¶ 9, 14 (2015).

<sup>2</sup> *Id.* at 7820 ¶ 1.

<sup>3</sup> *Id.* at 7821-24 ¶¶ 4-7.

service. Instead, the Commission should allow Lifeline-eligible consumers to choose the service which best meets their needs.

Public Knowledge also discussed other matters discussed in the *FNPRM*, including whether the Commission should establish minimum service standards for Lifeline supported services; the amount of the Lifeline subsidy; whether the Commission should establish a budget for the Lifeline program; whether and how to streamline the Eligible Telecommunications Carriers (“ETC”) designation process; and establishing or designating a national verifier to make customer eligibility determinations.

Public Knowledge explained that any minimum service standards should provide Lifeline customers with significant flexibility to determine which service and service provider to subscribe to. Additionally, if the Commission establishes minimum service standards, it should account for the services and costs of services available in the marketplace, as well as the functionality that Lifeline customers need to participate in our society and economy.

Public Knowledge also urged the Commission to account for the cost of service as it considers the Lifeline subsidy level for voice and broadband services and whether to establish a budget for the Lifeline program. Further, Lifeline eligibility and the number of subscribers will likely increase as economic conditions worsen. Any budget for the Lifeline program should recognize that the program is countercyclical to economic conditions and have the flexibility to meet increasing demand for Lifeline support when the need arises.

Public Knowledge also expressed support for the Commission’s fact-finding inquiries on whether and how to streamline the ETC designation process and whether to establish or designate a national eligibility verifier. Public Knowledge is interested in efforts to lower barriers for telecommunications service providers seeking to serve low-income consumers and improve program efficiency, and supportive of increasing broadband competition to provide consumers with more choices.

In accordance with Section 1.1206(b) of the Commission’s rules, this letter is being filed with your office. If you have any further questions, please contact me at (202) 861-0020x108.

Respectfully submitted,

/s/ Meredith Rose

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