



**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	FCC 15-71
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
Connect America Fund)	WC Docket No. 10-90

COMMENTS OF THE CITY OF SEATTLE

I. INTRODUCTION

The City of Seattle submits comments in response to the Notice of Proposed Rulemaking (“NPRM”), released July 17, 2015, in the above-entitled proceedings.

We support the proposed reforms to the Federal Communications Commission (FCC) Lifeline program. We commend the Commission for its commitment to restructure, modernize and improve access to broadband Internet for low-income residents in our city.

II. IMPORTANCE OF LIFELINE REFORM TO RESIDENTS IN THE CITY OF SEATTLE

The City of Seattle (City) is well known as a technology capital. Yet while our high-tech industry thrives, many of our residents still struggle to afford access to communications technology and to be full participants in a digital world. Seattle’s lowest income residents earning under \$20,000 per year are about 25% less likely to use the Internet than those earning more than \$100,000 and 15% of our resident do not have Internet access at home. The percent without access is even higher for our immigrant/refugee families.

Since access is critical to self-sufficiency and the government delivery of services to residents, in 2015, the City launched a Digital Equity Initiative to improve Internet access, skills and online services for all.¹ Broadband deployment, access and adoption are fundamental to this effort. Broadband and access to the information it provides is responsible for economic growth, job creation, education, and a better quality of life.

¹ <http://www.seattle.gov/digital-equity>



Our City's efforts to promote digital equity include a wide variety of funding programs. The Community Technology Program² provides funding to organizations to increase technology literacy and access to enhance electronic civic participation. The City has also conducted several residential Technology Indicator³ surveys and over the past 16 years results show an increasing need to support access to broadband services. More needs to be done to ensure affordable broadband deployment occurs in areas where broadband service is lacking. For this reason, the City supports the Commission's decision to modernize and expand the Lifeline program and extend the subsidy to broadband services.

III. DISCUSSION

Below are the primary areas of concern on the topics that the FCC is seeking comment.

- Eliminate the restriction of only one subsidy per household. There should be at least two connections allowed per household to ensure adequate service and mobility. The current limitation appears to be based on the legacy program when landline telephones were the only option. Any effort to truly modernize the program should take into account fixed and wireless broadband options and recognize that many low income families use a wireless phone as their primary source of broadband access.
- Utilize the FCC minimum standards. Minimum standards for broadband should be based on the FCC's definition of 25mbps down and 3 mbps up. The FCC should also consider developing complementary standards for wireless, including other items such as data caps.
- Subsidize or include equipment. The current monthly fees or purchase fees for modems, in addition to computers or other devices presents an additional barrier to entry and sustaining service for low-income residents.
- Ensure consumer protection and sufficient promotion. Seattle's survey of residents and focus groups with community social service providers found that limited marketing, lack of clarity in pricing and terms and lack of translated materials in our limited English speaking communities created barriers to adoption of the program by eligible residents. The FCC should ensure sufficient promotion by mandating providers to include other languages and ADA accessible formats. We also recommend a test for quality in customer service for people applying for the Lifeline program.
- Sufficient reporting of Lifeline uptake. Ensure providers report regularly on the levels of adoption at the city level to enable local jurisdictions to assist the FCC in overseeing implementation of the program.

IV. CONCLUSION

² <http://www.seattle.gov/tech/>

³ <http://www.seattle.gov/tech/indicators>



In 2012, the Commission took an important step in Lifeline program reforms. The Commission should continue to move forward with modernizing the program to assist our low-income consumers who need to connect, and remain connected, to reliable broadband services.

Respectfully submitted,

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