

# BALTIMORE CITY COUNCIL

---



August 18, 2015

Chairman Tom Wheeler  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: 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

Dear Chairman Wheeler,

As our City continues to recover from the economic recession, we wish to highlight the important role programs like Lifeline have played in helping low-income Baltimore City residents overcome unemployment and other financial obstacles. Lifeline ensures that all have access to vital communications services that are meant to connect them to employers, family, healthcare and help in emergency cases. The Federal Communications Commission has done a remarkable job maintaining and updating the program since it was implemented over three decades ago.

We wholeheartedly support the FCC's proposal to modernize Lifeline and make it more effective for the 21st Century. It is extremely important for disadvantaged households to have access to telecommunications services that are offered to other citizens, allowing them to be competitive in the job market and work on advancing their education. Broadband is one of these services. However, although we support expanding Lifeline to provide broadband, this service should not come at the expense of traditional phone services. Moreover, the monthly benefit amount that is currently being used for voice would not be sufficient to support broadband services or a bundle of both voice and broadband. The level of broadband that qualified consumers would receive will not have a material impact on Lifeline for low-income households and will not be effective to actually solve any communications issues. Furthermore, Lifeline qualified customers cannot afford to make any added payments to get the additional service. As a result, free wireless Lifeline will be adversely affected. Historically, low participation rates were the direct cause and effect of such payment system.

Also establishing a system in which Lifeline benefits are directly given to customers through vouchers can also impede the ability for Eligible Telecommunications Carriers (ETCs) to reach qualified low-income individuals and households. Consumers who are eligible for Lifeline should not have limited access to the program. Voucher systems can also be subject to

abuse and fraud; there will always be those who will see it as an opportunity to take advantage of others' needs. Lifeline provides vital telecommunication services and it is crucial that we set and maintain adequate rules to manage honest access to the program.

The proposal to have the eligibility determinations made by either a government entity separate from the FCC or a third-party private entity under contract to government also concerns us. ETS's should use personal identification requirements to prevent fraud and serve the same regulatory purpose, without adding an unnecessary burden on the carrier and possible delays in providing the service for consumers. As an example, we have a secure form to check eligibility for Lifeline in Maryland, so there is no need to change our enrollment processes and add obstacles for the neediest members of our community.

We appreciate your consideration for our concerns and look forward to seeing the modernization of the Lifeline program. It is an important program upon which many of our constituents rely to provide access to vital communications services.

Sincerely,  
Baltimore City Council Members

(name)  
Councilwoman  


(name)  
Councilwoman 

(name)  
Councilwoman 

cc: Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly