



Strengthening Neighborhoods.
Improving Lives.

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

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FCC Mail Room

Re: [Docket Nos. 11-42,09-197,10-90] FCC 15-71 Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund

To Whom It May Concern:

The Council of Large Housing Authorities (CLPHA) is a non-profit organization that works to preserve and improve public and affordable housing through advocacy, research, policy analysis, and public education. Our membership of more than seventy large public housing authorities own and manage nearly half of the nation's public housing program, administer a quarter of the Housing Choice Voucher program, and operate a wide array of other housing programs. We are pleased to submit comments on the Lifeline Program and its impact on HUD programs.

Regarding overall comments on Lifeline:

- CLPHA supports the expansion of the Lifeline subsidy to include home broadband for low-income consumers. We believe that connectivity is critical to helping reduce the achievement gap for low-income children who need access to complete homework, learn crucial skills, and apply for college and jobs; adults need access for many of the same reasons, and older adults need vital connection to others for physical and mental health reasons. More tools and strategies, like the Lifeline subsidy, that help low-income households access broadband will help address this gap. **The FCC should expand the Lifeline program to include broadband.**
- CLPHA encourages the FCC to consider possible models for the Lifeline broadband subsidy that would improve the program's flexibility. For example, if the subsidy level of \$9.25 per household could be aggregated at a property level, affordable housing developers could more efficiently provide broadband to every unit. With operating support from Lifeline, affordable housing developers could pursue other funding sources for the up-front capital and to provide computing equipment and digital literacy services. Recent efforts in Austin illustrate a possible approach to providing property-level broadband in affordable housing. Through a partnership with Google Fiber, the Housing Authority of the City of Austin (HACA) will receive

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free installation of broadband in its public housing units. Because of that initial subsidy, HACA pursued partnerships with the community college and other organizations to provide residents access to discounted computing equipment and digital literacy classes. **The more flexibly the subsidy is designed, the more successful it will be** in terms of leveraging other funding sources to provide robust programming to low-income households to include equipment and digital literacy. Flexibility will also support solutions designed to leverage local resources and adapt to circumstances in for local communities.

- CLPHA encourages the FCC to:
 - A. **Support broadband in affordable housing through FCC actions.** The FCC is uniquely positioned to reduce costs of broadband service for low-income households, encourage public-private partnerships to serve low-income communities, and make broadband part of coordinated neighborhood transformation strategies. In future mergers, the FCC should require companies to:
 - i. Work with HUD, state and local housing agencies, and affordable housing stakeholders to implement broadband access in publicly-subsidized housing developments including public housing, Section 8, Low Income Housing Tax Credit, and others.
 - ii. Contribute to independent funds to support broadband adoption at home and implement strategies to improve and expand Comcast's Internet Essential program to all low-income families and individuals.
 - iii. Upgrade infrastructure in underserved areas and extend into unserved communities to improve broadband deployment, with special attention to low-income neighborhoods and multifamily buildings serving households below median income.
 - iv. Ensure that provider-supported connectivity programs reach all people in need, especially seniors and people with disabilities who may not be captured by school-related criteria for eligibility.
 - B. **Provide federal funds to support broadband connectivity in affordable housing.** Existing resources are not sufficient to accomplish all that is needed, including capital installation, ongoing operation, equipment, digital literacy training, and technical support. As part of annual appropriations, Congress should allocate additional funding for public and assisted housing to pay for broadband costs in property operations, as well as large-scale pilots to refine best practices for implementing broadband at a property level. Tax incentives are an alternative mechanism for defraying cost of broadband connectivity in affordable housing, if properly structured in a pay-for-performance model and not diverted from existing affordable housing programs.
 - C. **Use public resources to leverage private resources.** Private businesses can be part of the solution to the digital divide, through both corporate philanthropy and private investment for business purposes at the large and small scale. In-home connectivity can make property management more efficient for multifamily housing, deliver health care services efficiently, and allow telecommuting for

workers. It can also bring low-income people into the economic mainstream as workers, consumers, and entrepreneurs. Scarce public resources should therefore leverage private contributions, of which there are many models, including community development financial institutions, tax credit incentives, loan pools, and in-kind contributions. Examples include Google Fiber projects in Austin and Comcast's Internet Essentials program.

Regarding specific requests for comment:

- *Section A. The Establishment of Minimum Service Standards*

CLPHA encourages the FCC to set minimum service standards so that when low-income consumers have access to broadband, it is at a speed sufficient to make a meaningful difference in their lives. On the question of a set subsidy level of \$9.25, the FCC needs to determine what kind of access this could feasibly support. Whatever subsidy level is set through the NPRM, it should have an inflation adjustment factor, so that the passage of time does not quickly make the program obsolete. If the FCC determines that \$9.25 will be the permanent subsidy level but that funding level is insufficient to meet minimum service standards for the program, the FCC should be very cautious about requiring low-income consumers to contribute. Some low-income consumers could potentially contribute a nominal amount to broadband service in addition to the \$9.25 subsidy, but for many others, even a \$10 commitment will be too costly to participate. The FCC may need to consider a higher level of subsidy to ensure widespread adoption of broadband.

As noted earlier, **allowing household subsidies to be aggregated within an apartment property could facilitate efficient access to broadband.** Property owners could pool the ongoing monthly subsidy to cover operating costs for property-wide broadband service, allowing them to leverage other sources for up front capital, digital literacy training and households' computing equipment. CLPHA also encourages the FCC to consider providing a subsidy for up front connection charges for residential Internet service. Again, a flexible structure where that subsidy could be aggregated at the property level could be incredibly helpful to ensure that all affordable housing residents at a property gain Internet access.

In response to the FCC's question on how to ensure that low income households that include school children are aware of the Lifeline program, **CLPHA encourages partnerships with public housing authorities (HAs) and private owners of subsidized affordable housing.** HAs, for-profit, and non-profit entities all work at the local level providing subsidized housing to low-income households and could help ensure families living in subsidized housing were aware of the Lifeline program.

- *Section B. Third Party Eligibility Determination*

CLPHA encourages the FCC to consider ways to **streamline administration of the Lifeline program** going forward. Eligible telecommunications providers should not bear the burden of determining household eligibility when more efficient means are available. We understand that FCC is considering a national verifier model. Other options deserve consideration either in combination with or instead of the national verifier. The FCC could

consider **allowing public housing authorities, operators of subsidized housing properties, and nonprofit community based organizations to play a greater role** in the program, including verification. These entities already verify resident income as part of qualifying tenants, so there may be opportunities to simplify the application process or coordinate with other federal benefit programs that qualify households for Lifeline, such as SNAP or Housing Choice Vouchers.

In response to the FCC's question on improving veteran access to broadband, coordinating with and using HUD-VASH voucher eligibility as a mechanism would improve outreach and access.

Lastly, CLPHA would encourage the FCC to focus on how to close the digital divide for low-income consumers before working on reducing program size. While we recognize the overall need for efficiency, the pressing needs of the 8.3 million low-income renters without access to home broadband indicate that the subsidy is essential to ensure widespread adoption of broadband.

- *Section C. Increasing Competition for Lifeline consumers*
CLPHA encourages the FCC to consider allowing non-eligible telecommunications carriers (ETC) or allowing PHAs, operators of subsidized housing, and community based nonprofits to become ETCs through an alternative definition to act as Lifeline providers. In many communities, housing organizations are pursuing alternative ways to provide home access to low-income consumers through Wi-Fi hot spots, mesh networks, etc. They also are typically well-connected with low-income consumers and able to effectively market the program to this consumer group. Allowing housing organizations to serve as Lifeline providers would greatly benefit the program.

CLPHA appreciates the opportunity to comment on this notice of proposed rulemaking and commends FCC for its proactive efforts to strengthen and improve access to broadband for low-income households. Please contact Abra Lyons-Warren (abra@clpha.org) with any questions.

Sincerely,



Sunia Zaterman
Executive Director