

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

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

**REPLY COMMENTS OF GENERAL COMMUNICATION, INC. ON SECOND  
FURTHER NOTICE OF PROPOSED RULEMAKING**

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## TABLE OF CONTENTS

I.	COMMENTERS OVERWHELMINGLY OPPOSE REDUCING TRIBAL LANDS SUPPORT OR TYING TRIBAL LANDS SUPPORT TO DENSITY. ....	4
II.	COMMENTS MAKE CLEAR THAT A MINIMUM BROADBAND REQUIREMENT IS UNNECESSARY AND MAY REDUCE LIFELINE AVAILABILITY AND INCREASE CHARGES TO LIFELINE CONSUMERS. ....	6
	A. So Long as the Commission Permits Lifeline Support for Standalone Broadband Service, Generally Available Broadband Services Will Be Available at Reduced Rates.....	7
	B. Verizon Correctly Observes That Mandating Broadband as a Component of Lifeline Contradicts the Structure of CAF Support, in Which Broadband Does Not Have to Be Offered to Every Location; and in Which Required Capabilities Vary Depending on Whether the Service is Fixed or Mobile, or Has Satellite Backhaul. ....	12
	C. Mandating the Inclusion of Broadband Will Likely Increase Costs, and Thus Rates, for Lifeline Consumers, Even If They Only Want Voice Service, Pricing More Subscribers out of Lifeline.....	14
	D. Mandating Inclusion of Broadband Could Exclude Providers from Offering Lifeline Service.....	15
	E. GCI’s Proposal for a Limited, One Added Connection Exemption to the One-Per-Household Rule for a Data-only Broadband Connection for Lifeline Eligible K-12 Students Is a Targeted Way to Address the “Homework Gap.” .....	16
III.	SEVERAL PARTIES POINT OUT THE PROBLEMS OF SETTING A FIXED LIFELINE BUDGET, AND NO PARTY SUPPORTING ONE PROPOSES A WORKABLE MECHANISM. ....	17
IV.	COMMENTERS SUPPORT AT LEAST RETAINING EXISTING SUPPORT LEVELS	19
V.	COMMENTS DEMONSTRATE THE NEED TO PRESERVE STATE VARIATION AND THE FLEXIBILITY FOR A STATE TO CREATE ITS OWN ELIGIBILITY VERIFICATION SYSTEM.....	20
VI.	LIFELINE PROVIDERS SHOULD NOT BEAR THE COSTS OF MANDATORY THIRD-PARTY ELIGIBILITY VERIFICATION. ....	21
VII.	COMMENTERS AGREE THAT THE COMMISSION SHOULD NOT REQUIRE A 24-HOUR CUSTOMER SERVICE NUMBER FOR SUBSCRIBER DE-ENROLLMENT WHEN A CARRIER DOES NOT PROVIDE 24-HOUR CUSTOMER SERVICE FOR NON-LIFELINE CUSTOMERS. ....	23
VIII.	OTHER ISSUES .....	24
	A. Commenters Agree That Subscriber-Originated Texts Should Count as Usage. ....	24
	B. Commenters Agree That the Commission Should Create Standardized Forms, but Must Correct Errors on USAC’s Model Forms. ....	25
	C. Commenters Agree That the Commission Should Not Make Wireless Emergency Alert Participation Mandatory for Lifeline. ....	26

D. Commenters Agree That Any Training and Certification Requirements Should Focus on Personnel Making Final Eligibility Determinations, Rather Than All Customer-Facing Personnel.....	26
IX. CONCLUSION.....	28

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**REPLY COMMENTS OF GENERAL COMMUNICATION, INC.**

**Introduction and Summary**

General Communication, Inc. (“GCI”) submits these reply comments regarding the Commission’s Second Further Notice of Proposed Rulemaking.<sup>1</sup> GCI fully supports the goal of ensuring that Lifeline is effective at supporting both voice and broadband subscribership among low-income Americans, with a particular focus on tribal lands. GCI demonstrated in its initial comments that Lifeline has led to greater telephone subscribership in Alaska, with GCI’s Lifeline service now available in 208 communities around the state. With the expansion of mobile service, this means that many low-income Alaskans now have access to emergency services even when away from home. The comments demonstrate that while some measures proposed in the NPRM could be effective, others could be counterproductive.

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<sup>1</sup> See *Lifeline and Link Up Reform and Modernization et al.*, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, 30 FCC Rcd. 7818 (2015) (“*2015 Lifeline Broadband NPRM*” or “*NPRM*”).

With respect to tribal lands, diverse commenters, from Native American organizations, to state public utility commissions, to Lifeline providers, all counsel against making changes to Lifeline support for tribal lands. These commenters point out that the proposed changes would adversely affect consumers. Alaskan commenters all oppose changes to the tribal support amount or the areas considered tribal lands and highlight that Native Alaskans struggle with extreme poverty in all communities, whether in the remote subsistence communities or in Anchorage. Anchorage is Alaska's "Biggest Native Village" and is an important and inextricable part of the Native Alaska community.

With respect to proposals to mandate minimum broadband capability within Lifeline offerings, these proposals miss the fact that if the Commission permits the Lifeline discounts to be applied to standalone broadband plans in addition to bundled voice and broadband plans, Lifeline consumers will have access to the full range of broadband plans with as much discount as Lifeline will sustain. Areas supported by the Connect America Fund are already, or will be as new mechanisms come on line, under requirements to extend and enhance broadband to unserved and underserved areas. So long as Lifeline discounts can be applied to any broadband service, these will also automatically become available to Lifeline-eligible consumers at a discounted rate. Mandating a minimum broadband component in all Lifeline plans forces consumers who do not want broadband to purchase it, and likely will raise the price for all Lifeline users, not just those who want broadband service. To close the "homework gap," GCI's proposal to allow a low-income eligible household with a K-12 student to obtain a second data-only connection targets Lifeline directly at the need, without forcing a low-income family to choose between an adult's need for a voice/data connection on the go and the child's need for broadband to study at home.

Many commenters support the proposal to develop a national eligibility verification system to relieve providers of that burden, but the record also makes clear that states should have the option to create their own eligibility system. In any event, Lifeline providers should not bear the costs of mandatory third-party verification, which should be an overall USF expense shared in the same manner as all other USF expenses. Placing that cost on Lifeline providers is equivalent to cutting the benefits and also is inconsistent with how the Commission recovers administrative costs for other USF mechanisms.

With respect to other proposed changes:

- No party supporting a budget proposed workable mechanisms for such a budget.
- Many commenters raise similar concerns to GCI that a 24-hour customer service line for Lifeline disconnections is unnecessary; this is especially the case when the provider has more than a *de minimis* non-Lifeline subscribership for which it does not provide 24-hour customer service.
- Standardized forms make sense, provided that they are comprehensible and correct.
- Comments support counting subscriber texts as usage.
- Wireless Emergency Alerts participation should remain voluntary.

Lifeline has successfully helped many Americans obtain telephone service. As the Commission considers further changes, it should empower those consumers to be active participants in the telecommunications marketplace, and should not dictate choices to them.

**I. COMMENTERS OVERWHELMINGLY OPPOSE REDUCING TRIBAL LANDS SUPPORT OR TYING TRIBAL LANDS SUPPORT TO DENSITY.**

Commenters overwhelmingly oppose reducing tribal lands support or tying tribal lands support to density.<sup>2</sup> Indeed, the Public Utilities division of the Oklahoma Corporation Commission warned in its comment submission that changes in the interpretation of the Tribal Land boundaries will result in Lifeline consumers seeing a considerable reduction in support.<sup>3</sup> Likewise, the Inter-Tribal Council of the Five Civilized Tribes commented that the current reform and modernization of the Lifeline program proposals should not adversely affect Native recipients of the Tribal Lifeline subsidy by changing the definition of tribal lands.<sup>4</sup> Further, the WTA supports continuation to enhanced tribal support for more densely populated areas.<sup>5</sup>

Alaska commenters across the board share this view. The Regulatory Commission of Alaska (“RCA”) explains in its reply comments that of all proposals set forth in the NPRM, “the most drastic effects on Alaska Lifeline consumers and carriers would result from the proposed redefinition of what constitutes tribal lands for purposes of qualifying for enhanced tribal

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<sup>2</sup> See, e.g., Comments of the California Emerging Technology Fund at 21-22, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (applauding the higher \$34.25 per month in federal Lifeline discounts for low-income consumers living on Tribal lands); Comments of WTA—Advocates for Rural Broadband at 17, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“WTA Comments”) (insisting that Tribal lands should continue to have enhanced Lifeline subsidies).

<sup>3</sup> See Comments of the Public Utility Division of the Oklahoma Corporation Commission at 11, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“Oklahoma Corporation Commission Comments”).

<sup>4</sup> See Comments of the Inter-Tribal Council of the Five Civilized Tribes at 2, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 13, 2015).

<sup>5</sup> See WTA Comments at 20.

Lifeline support.”<sup>6</sup> As such, the RCA advocates for continued expansion in Alaska of “programs that create financial incentive for carriers to serve and deploy facilities” and “preserving the FCC’s current Lifeline efforts in Alaska that enhance the purchasing power of low-income Alaskans by providing the enhanced tribal support statewide.”<sup>7</sup> Alaska Communications Systems (“ACS”) explained that it opposes the reduction of support for low-income residents of Tribal lands in Anchorage because it would harm Alaska’s most vulnerable residents and disserve the goals of the Communications Act.<sup>8</sup> Similarly, the Alaska Rural Coalition (“ARC”) asks that the Commission not establish a maximum population density above which Lifeline support is discontinued because consumers on Tribal lands already face a gap in service and inherent cultural disadvantages, and the Commission should not reduce the benefits they receive simply because such consumers live in a more populated area.<sup>9</sup> GCI in its comments provided data showing how Alaska Natives fare worse than the national population as a whole across a variety of social and economic indicators.<sup>10</sup> ARC warns that singling out more populated areas sets a dangerous precedent that will ultimately harm service on Tribal lands, as GCI also demonstrated with respect to its own statewide Lifeline offerings that are tailored to meet the needs of Alaska’s

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<sup>6</sup> Reply Comments of the Regulatory Commission of Alaska at 5, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Sept. 29, 2015) (“RCA Reply Comments”).

<sup>7</sup> *Id.* at 6.

<sup>8</sup> See Comments of Alaska Communications at 9, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“ACS Comments”).

<sup>9</sup> See Comments of the Alaska Rural Coalition at 17, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (explaining that Tribal lands, such as Anchorage, Alaska, contain urban areas that are more densely populated) (“ARC Comments”).

<sup>10</sup> Comments of General Communication, Inc. on Second Further Notice of Proposed Rulemaking at 11, Table 1, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“GCI Comments”).

migratory workforce.<sup>11</sup> GCI agrees with ARC, in that, to the extent the Commission wishes to continue investigating its proposal to reduce Tribal lands support, it must necessarily develop a fuller record<sup>12</sup> – a record which must also include the ability, feasibly, to implement and police distinctions made within narrow geographic areas.<sup>13</sup> As GCI pointed out, cutting Lifeline support in Anchorage will reduce the service available to a low-income consumer when he or she travels to work at a fish plant, oil rig, or other remote location, as many residents of Anchorage do.<sup>14</sup> This point is further highlighted by the Regulatory Commission of Alaska (“RCA”) in its reply comments, as it explains that Anchorage “has a significant Alaska Native population and serves as the transportation, economic, and human services hub on which all Alaskan communities continue to rely.”<sup>15</sup>

**II. COMMENTS MAKE CLEAR THAT A MINIMUM BROADBAND REQUIREMENT IS UNNECESSARY AND MAY REDUCE LIFELINE AVAILABILITY AND INCREASE CHARGES TO LIFELINE CONSUMERS.**

The comments demonstrate that, though well-intentioned, proposals to create a minimum broadband requirement are unnecessary, inconsistent with the structure of high-cost support, and may lead to reduced Lifeline availability and higher charges to Lifeline consumers. As an alternative, the Commission should simply make all standalone broadband plans eligible for a Lifeline discount, just as bundled voice and broadband plans are eligible today.<sup>16</sup> Doing so treats

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<sup>11</sup> See ARC Comments at 18; GCI Comments at 15.

<sup>12</sup> See ARC Comments at 18.

<sup>13</sup> See GCI Comments at 15-16.

<sup>14</sup> See GCI Comments at 6-8.

<sup>15</sup> See RCA Reply Comments at 7 (“The RCA notes that the FCC has to date helped to provide a unified front with respect to the federal treatment of Alaska as uniquely and entirely made up of tribal lands . . . the FCC should not abandon that position lightly or without rigorous study and appropriate tribal engagement.”)

<sup>16</sup> See 47 C.F.R. § 54.401(b).

Lifeline customers with the dignity they deserve and recognizes that low-income status is not necessarily tied to a consumer's demand for a particular level of service. Like customers in other income categories, some low-income customers value more robust broadband and voice connectivity than others.

**A. So Long as the Commission Permits Lifeline Support for Standalone Broadband Service, Generally Available Broadband Services Will Be Available at Reduced Rates.**

Today, the Lifeline rules permit a Lifeline provider to allow Lifeline users to apply the Lifeline discount against “any residential service plan that includes voice telephony service, including bundled packages of voice and data services . . . .”<sup>17</sup> By doing this, the Commission allows carriers to open their entire slate of voice offerings, including bundled service packages, for Lifeline eligible consumers to purchase, in part, using Lifeline support. A simple further step that the Commission could take – which commenters support – is to allow Lifeline consumers to purchase standalone broadband services using Lifeline support.<sup>18</sup>

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<sup>17</sup> *Id.*

<sup>18</sup> See Comments of Verizon at 9, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“Verizon Comments”) (stating that, should the FCC include broadband, the rules must give carriers the option of providing a Lifeline discount on standalone broadband service); Comments of New America’s Open Technology Institute at 4, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (asserting that Lifeline providers, both wireless and wireline, should offer standalone broadband service as an option.) (“New America’s Open Technology Institute Comments”); Comments of School, Health & Libraries (SHLB) Broadband Coalition at 1-2, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (urging the Commission to establish broadband connectivity as a stand-alone service to avoid consumers in areas where traditional telephony is no longer available being excluded from Lifeline); and Comments of AARP at iii, 5, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (submitting that Lifeline providers should be required to offer stand-alone voice service at a reasonable rate—including unlimited local calling for wireline carriers) (“AARP Comments”).

The effect of such changes would be to open up a provider's entire suite of broadband offerings to Lifeline consumers, who would then only have to establish creditworthiness to pay the amounts not covered by Lifeline support. Using GCI's offerings as examples, in Bethel, GCI's \$65/month broadband price would be reduced to \$30/month for 2 Mbps down / 256 Kbps up, with higher speeds and/or usage available at a \$35 discount from the retail price. Similarly, in Anchorage, GCI's \$60 plan would be discounted to \$25/month, for 10 Mbps down / 1 Mbps up, with higher speeds and/or usage similarly available. Of course, as USTelecom points out, Lifeline providers will also have to be able to administer creditworthiness requirements for such offerings to account for consumer credit risk and/or bad debt, since consumers would be responsible for a much larger share of a monthly bill.<sup>19</sup>

Other commenters support this approach. For instance, Verizon recommends that if the Commission moves forward to support broadband through Lifeline, it should do so by allowing carriers the option of providing a Lifeline discount on standalone broadband service, or to meet any mandate by simply applying the Lifeline discount to the amounts of the broadband offering.<sup>20</sup> As Verizon points out, "[t]he Lifeline subsidy is simply reimbursement to carriers for a service discount; it does not compensate carriers for the cost of additional build-out or the cost of creating a Lifeline-specific service offering."<sup>21</sup> Likewise, AT&T recommends allowing Lifeline customers to apply the discount to both bundled and standalone broadband offerings.<sup>22</sup>

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<sup>19</sup> See Comments of the United States Telecom Association at iii, 6-7, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) ("USTelecom Comments").

<sup>20</sup> See Verizon Comments at 9.

<sup>21</sup> *Id.*

<sup>22</sup> See Comments of AT&T at 9, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) ("AT&T Comments").

AT&T explains that its suggested approach would ensure “reasonably comparable” access to services for low-income consumers and “would also eliminate the need to establish minimum service standards for Lifeline service, since Lifeline customers would have access to the same service offerings that participating providers make available to non-Lifeline consumers.”<sup>23</sup>

Similarly, NCTA proposes allowing eligible low-income consumers to use their Lifeline discounts on any voice, broadband service, or bundle of voice or broadband services offered by any participating service provider, rather than adopting minimum service standards for Lifeline voice and broadband service.<sup>24</sup>

Assuming that Lifeline consumers can apply Lifeline support to any standalone broadband plan, the effect of mandating a minimum broadband requirement is simply to narrow choice and reduce competition. As ITIF notes, “[t]elling recipients that they cannot purchase lower speed broadband, even if it is cheaper, goes against the very spirit of the proposal.”<sup>25</sup> Comcast, accordingly, implores that the Commission not adopt minimum service levels “that would undermine consumers’ flexibility to choose the level of service that meets their needs. . . .”<sup>26</sup> Sprint similarly observes that minimums are “unnecessary and contrary to the

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<sup>23</sup> *Id.*

<sup>24</sup> *See* Comments of the National Cable & Television Association at 2, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“NCTA Comments”); *see also* Comments of Cincinnati Bell Telephone Company at 4, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“[T]he Commission should refrain from setting a minimum speed but should instead make any service eligible that qualifies as ‘broadband’ as described in the Commission’s Rules.”).

<sup>25</sup> Comments of ITIF at 5, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“ITIF Comments”).

<sup>26</sup> Comments of Comcast at 12-13, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015).

public interest,” but also notes there should be a prohibition against redlining.<sup>27</sup> As the New York State Public Service Commission (“NYPSC”) warns, “minimum service standards for subsidized services could actually restrict the offerings available to low income consumers.” The NYPSC thus “urge[d] the FCC to maintain as much competitive choice as possible by not restricting the product offerings available to low-income customers via the imposition of minimum standards. Low-income consumers should benefit from the kind of options and choice that is available to the general body of consumers.”<sup>28</sup> By prescribing a minimum offering below which Lifeline could not be applied, the Commission would be reducing competition from plans that offer more affordable, if less robust, options for low-income consumers.

Likewise, the American Cable Association explains that the absence of broadband minimums would incentivize wireline providers to participate and encourage competition.<sup>29</sup> According to the CTIA—The Wireless Association, competition among providers will generate better service offerings than minimum standards.<sup>30</sup> Lifeline Joint Commenters offer that, rather than establishing minimum service standards through regulation, the FCC should promote competition in order to offer a variety of services to consumers.<sup>31</sup> NTUA Wireless likewise

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<sup>27</sup> Comments of Sprint Corporation at 2, 12, 17, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“Sprint Comments”).

<sup>28</sup> Comments of New York State Public Service Commission at 7, WC Docket No. 11-42 et al. (filed Aug. 31, 2015) (“NYPSC Comments”).

<sup>29</sup> See Comments of American Cable Association at 8, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“ACA Comments”).

<sup>30</sup> See Comments of CTIA—The Wireless Association at 10, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015).

<sup>31</sup> See Comments of the Lifeline Joint Commenters on the Second Further Notice of Proposed Rulemaking to Modernize and Restructure the Lifeline Program at 3, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“Comments of Lifeline Joint Commenters”). Similarly, Telscape Communications, Inc. and Sage Telecom Communications, LLC opine that there is no need to set minimum standards for broadband, and that the Commission

comments that minimum service levels are not in the public interest, competition leads to better service offerings, and that if there are minimum service levels, there must be different minimums for low-density areas.<sup>32</sup>

Taking this approach of making any broadband service eligible for a Lifeline discount also spares the Commission the difficult determination of what would be a reasonable amount of broadband to mandate, and how best to do so.<sup>33</sup> Put differently, the task of determining the

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should focus on maximizing competition and consumer choice, maintaining technological neutrality, and minimizing regulation. *See* Comments of Telscape Communications, Inc. and Sage Telecom Communications, LLC at 5-8, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015).

<sup>32</sup> *See* Comments of NTUA Wireless, LLC at 10-11, WC Docket Nos. 11-42, 09-197 & 10-90, (filed Aug. 31, 2015).

<sup>33</sup> The Commission received many different and conflicting suggestions on this point. *See, e.g.*, Comments of Members of the Rural Broadband Policy Group at 18, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (the Commission should set minimum speed requirements for services restricted to Lifeline customers, taking care not to preclude communities from obtaining basic Internet access and to ensure Tribal lands in particular are not locked into sub-standard service); AARP Comments at 12 (reasonable minimums are especially important if the FCC pursues fixed broadband and multiple people per household will be using the connection); Comments of Windstream Services, LLC at 3, 6, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (minimums are justified only in limited circumstances and that if broadband minimums are applied, they must be technology-neutral) (“Windstream Comments”); Comments of National Hispanic Media Coalition at 12-16, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (minimum broadband standards may be useful but should evolve as the market changes, and be sufficient to participate in economic activity, bridge the homework gap, and access public health information); Comments of Commnet Wireless, LLC and Choice Communications, LLC at 6, 8, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (there should not be across-the-board minimums; the FCC should account low-density, remote areas when establishing service minimums) (“Commnet and Choice Comments”); Comments of GVNW Consulting Inc. at 2, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 27, 2015) (broadband minimums should be “technology neutral and equally applicable to mobile and fixed services. Wireless CPE should not be included in determining affordability”); USTelecom Comments at iv, 9-11 (the Commission consider the impact on consumer choice of establishing broadband minimums, and only do so in a technologically neutral manner “with identical minimum speeds for wireline and wireless services”).

reasonable level of broadband service is put into the consumer's hands, rather than being a paternalistic determination. The consumer can then select the level of service that suits both the consumer's needs and ability to pay. Of course, if significant numbers of low-income consumers still cannot afford broadband service, that itself suggests that the Lifeline support amounts are inadequate to the task.

**B. Verizon Correctly Observes That Mandating Broadband as a Component of Lifeline Contradicts the Structure of CAF Support, in Which Broadband Does Not Have to Be Offered to Every Location; and in Which Required Capabilities Vary Depending on Whether the Service is Fixed or Mobile, or Has Satellite Backhaul.**

Verizon correctly observes that mandating broadband as a component of lifeline contradicts the structure of Connect America Fund ("CAF") support, in which broadband does not have to be offered to every location, and in which required capabilities vary depending on whether the service is fixed or mobile, or has satellite backhaul.<sup>34</sup> Alaska provides examples of all of these situations. First, much of Alaska is served by rate-of-return carriers that are only required under high-cost rules to provide broadband in response to a reasonable request – which excludes<sup>35</sup> locations where the incremental cost of serving the consumer exceeds the incremental revenue. However, a mandated broadband level would require offering broadband to any Lifeline subscriber, even if there has not been a reasonable request. Second, other parts of Alaska have no CAF support for broadband because they are price cap service areas that are

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<sup>34</sup> See Verizon Comments at 7-8.

<sup>35</sup> See *Connect America Fund et al.*, Report and Order, FCC 14-190, 29 FCC Rcd. 15,644, 15,653 ¶ 24 (2014) ("[T]he Commission has explained that a request would *not* be reasonable if the incremental cost of undertaking the necessary upgrades to a particular location exceed the revenues that could be expected from that upgraded line.") (emphasis added) (citing *Connect America Fund et al.*, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 14-54, 29 FCC Rcd. 7051, 7102 ¶ 144 (2014) ("*December 2014 Order*").

above the ultrahigh cost threshold, and further, ACS and the Commission have yet to flesh out ACS's broadband deployment obligations that will accompany CAF Phase II non-contiguous area frozen support, which may not cover all locations specified under CAF Phase II model-based support.<sup>36</sup> Yet a Lifeline mandate could require that level of broadband even in areas with no high-cost support. Third, the Commission has set different minimum broadband speed requirements under CAF Phase II and the Mobility Fund Phase I,<sup>37</sup> creating the potential that a broadband minimum could exceed the Mobility Fund Phase I requirements, forcing enhanced speeds for mobile Lifeline service – or exclusion of those areas from Lifeline mobile offerings. As yet a fourth example, the Commission specified a lower broadband performance requirement when an area is served by satellite backhaul than by terrestrial backhaul.<sup>38</sup> Would a Lifeline minimum offering requirement nonetheless require a higher speed or capacity broadband service in those areas?

The Commission cannot possibly hope to mesh all of these different broadband requirements under CAF support mechanisms with a Lifeline minimum broadband service requirement. Any set of rules that failed to reconcile CAF broadband requirements and support with Lifeline broadband requirements would be arbitrary and capricious. Accordingly, the Commission should not try to do so, and should simply permit carriers to apply Lifeline discounts to any standalone broadband service – including plans that the consumer may elect that

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<sup>36</sup> See ACS Comments at 15 (explaining that Lifeline broadband service should only apply where broadband has been deployed).

<sup>37</sup> Compare *December 2014 Order* (mandating 10 Mbps / 1 Mbps minimum for fixed broadband by price caps LECs and RoR LECs), with 47 C.F.R. 54.1006(a)(1), (b)(1) (mandating MF1 requirements of 768 Kbps for 4G and 200 Kbps downlink for 3G.)

<sup>38</sup> See *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, 26 FCC Rcd. 17,663, 17,699-700 ¶ 101 (2011) (“*USF/ICC Transformation Order*”).

may provide lower levels of broadband than the plans that CAF support requires be offered (in those areas that receive CAF support).

**C. Mandating the Inclusion of Broadband Will Likely Increase Costs, and Thus Rates, for Lifeline Consumers, Even If They Only Want Voice Service, Pricing More Subscribers out of Lifeline.**

As GCI pointed out in its comments, mandating the inclusion of broadband will likely increase costs, and thus rates, for Lifeline consumers, even if they only want voice service. Other commenters agree. For instance, TracFone advises that minimums would increase the number of consumers that need to contribute their own funds in order to obtain service, which TracFone opposes because their own customer research shows that, for example, more than 41% of Lifeline customers are unbanked.<sup>39</sup> This sentiment is supported in comments submitted by NATOA, NLC, and AT&T, each acknowledging that user charges will rise as a result of broadband expansion.<sup>40</sup> Similarly, the Information Technology and Innovation Foundation (“ITIF”) expresses that minimum standards would reduce participation “while tilting the program to those who can most easily afford broadband, running counter to the goal of the program.”<sup>41</sup> The RCA expresses its Alaska-specific, though generally relevant concern, that “if the FCC carries forward with its proposal to establish national wireless and wireline broadband

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<sup>39</sup> Comments of TracFone Wireless, Inc. at 14-16, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“TracFone Comments”).

<sup>40</sup> See the National Association of Telecommunications Officers and Advisors and the National League of Cities at 3, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 26, 2015) (asserting that the budget should balance the need for voice and broadband services in qualifying low-income households with the financial burden imposed on other consumers); AT&T Comments at 2, 30 n.61 (“The Commission cannot . . . amend Section 54.101 of its rules to include broadband Internet access service as a supported service” “without any funding for such expansion.”).

<sup>41</sup> See ITIF Comments at 6.

Lifeline standards, as well as greatly augmented voice service standards, the likely result, at least in Alaska, will be to effectively price out of the market the low-income consumers the Lifeline program was specifically designed to empower.”<sup>42</sup>

Commenters that advocate inclusion appear to assume that expanding service levels would not be accompanied by a change in price. As explained above, this is not a sound assumption given that providers incur increased costs to provide service enhancements. As such, GCI urges that the Commission not mandate broadband inclusion.

**D. Mandating Inclusion of Broadband Could Exclude Providers from Offering Lifeline Service.**

Mandating inclusion of broadband could exclude providers from offering Lifeline service. The NYPSC recognizes as much with its concern “that carriers will determine that it is not economically viable to meet evolving minimum requirements for Lifeline subsidized services and decide to remove those services from the market.”<sup>43</sup> If it is not possible to achieve a specified throughput or it becomes more expensive than non-Lifeline service, providers will likely not participate in Lifeline, which is counterproductive. Such a mandate would also raise additional hurdles. For example, if the mandated broadband level exceeded what GCI were capable of providing in some parts of the state, it could no longer offer its popular statewide Lifeline offering.

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<sup>42</sup> See RCA Reply Comments at 11 (citing *NPRM* ¶¶ 34-51).

<sup>43</sup> See NYPSC Comments at 7.

**E. GCI’s Proposal for a Limited, One Added Connection Exemption to the One-Per-Household Rule for a Data-only Broadband Connection for Lifeline Eligible K-12 Students Is a Targeted Way to Address the “Homework Gap.”**

As recognized in the NPRM and highlighted by at least one recent statement by an FCC commissioner, the “homework gap” is a national issue that that must be remedied to fight against the possibility of losing “out when we have a generation ill-prepared to enter the digital economy.”<sup>44</sup> To help close the “homework gap,” GCI proposes that the Commission allow for a limited exception to the “one-per-household” rule. That is, the Commission should allow a household with one or more low-income students to have access to a single broadband connection in the home, regardless of whether a student’s parent or guardian (or other household member) has any other Lifeline service.<sup>45</sup> This proposal is a more straightforward way of addressing the “homework gap” than mandating the inclusion of broadband in every Lifeline service package, or adopting high minimum speed or volume requirements, as some other commenters proposed.<sup>46</sup> For one thing, given the one-per-household rule, simply mandating a high level of broadband, in addition to all the other problems that it creates, still sets up the situation in which the broadband connection that the student needs may walk out the door when a parent goes to work. In addition, GCI’s proposal is precisely targeted at school-aged children,

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<sup>44</sup> See *Statement of Commissioner Jessica Rosenworcel Regarding Introduction of Digital Learning Equity Act*, FCC (Sept. 22, 2015) (“The Homework Gap is the cruelest part of the new digital divide. Today, too many students are unable to complete their school assignments because they do not have Internet access at home.”), [http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2015/db0922/DOC-335419A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0922/DOC-335419A1.pdf).

<sup>45</sup> See GCI Comments at 21-22.

<sup>46</sup> See, e.g., Comments of ADTRAN, Inc. at 3, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (imploring the Commission to select minimum standards that would allow the household to engage in Internet surfing/research, video calling, job seeking, and closing the “homework gap”).

unlike a general mandate that then requires all Lifeline consumers to purchase broadband, even if they neither want nor need it.

Other commenters agree on the need to reduce the size of the “homework gap” but often less targeted proposals. For instance, Common Sense Kids Action proposes that the Commission include broadband Internet in the Lifeline program, prioritizing low-income families with school-aged children to address the homework gap (to some extent thereby echoing GCI’s proposal).<sup>47</sup> The Education & Libraries Network Coalition suggests that the Commission measure the extent of the homework gap and provide support for districts to provide broadband-poor students with solutions to gain access to broadband at home.<sup>48</sup> But measuring the homework gap is administratively cumbersome and far afield of the FCC’s expertise. This is also too blunt an approach, since it would leave out poorer segments of wealthier districts. And in addition to all the other flaws of included minimums discussed above, including forcing low-income consumers to buy more broadband than they need or want, this still does not address the problem of an adult member of the household having a mobile Lifeline service that exits with the adult and leaves the student with no broadband connection at all.

### **III. SEVERAL PARTIES POINT OUT THE PROBLEMS OF SETTING A FIXED LIFELINE BUDGET, AND NO PARTY SUPPORTING ONE PROPOSES A WORKABLE MECHANISM.**

Many commenters side with GCI in advocating against a set Lifeline budget. For instance, Common Cause asks that the FCC refrain from capping Lifeline, imposing a budget, or

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<sup>47</sup> See Comments of Common Sense Kids Action at 4, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015).

<sup>48</sup> See Comments of Education & Libraries Network Coalition (EdLiNC) at 8, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 26, 2015).

requiring co-payments.<sup>49</sup> Free Press explains that “[s]etting a per-subscriber subsidy limit at a fixed amount negates any need for an overall program budgetary limit,” especially since participation rates have not and will never be 100%.<sup>50</sup> Similarly, COMPTTEL asserts that the Lifeline program should not have a budget at this time,<sup>51</sup> and NTCA emphasizes that creating artificial budgets that have no ties to underlying costs would undermine the essential effort to coordinate interconnected programs and ensure that all Americans have sustainable and affordable access to high-quality communications services.<sup>52</sup>

None of those who support a Lifeline budget proposes a workable mechanism.<sup>53</sup> For example, none suggests how a budget would operate if it were exceeded in the middle of a funding year, or even if changes were made only at the end of a year. Simply reducing support levels ratably threatens service to all Lifeline consumers, whether done mid-year or at the end of the year. The alternative of refusing to enroll new Lifeline subscribers is equally unpalatable – as a low-income consumer could be denied the means to reach 911. A budget sounds good in concept, but no one explains how to operationalize it. As such, the Commission should not set a

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<sup>49</sup> See Comments of Common Cause at 16-17, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 27, 2015).

<sup>50</sup> Comments of Free Press at 60, 62, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015).

<sup>51</sup> See Comments of COMPTTEL at 28, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015).

<sup>52</sup> See Comments of NTCA—The Rural Broadband Association at 11, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (“NTCA Comments”).

<sup>53</sup> See, e.g., Comments of Florida Public Service Commission at 2, 4-5, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (suggesting that the FCC create a budget or cap for Lifeline, perhaps tied to the SNAP participants).

Lifeline budget unless it can specify key operational details, such as how it would actually work and be enforced, consistent with the program's policy objections.

#### **IV. COMMENTERS SUPPORT AT LEAST RETAINING EXISTING SUPPORT LEVELS**

Commenters support at least retaining existing support levels. For instance, while commenters such as Internet Innovation Alliance,<sup>54</sup> Michigan Public Service Commission,<sup>55</sup> and Verizon<sup>56</sup> focus on the believed adequacy of the existing support levels, others propose added support. For instance, ARC would like the Commission to consider a higher level of support to correspond to a higher level of service.<sup>57</sup> Similarly, AARP offers that the current support level will not lead to substantial broadband adoption; the main barrier to broadband adoption is the high cost.<sup>58</sup> Sprint submits that, while \$9.25 is a satisfactory support level for voice, it is too low for broadband service, especially considering the cost of buying broadband-capable equipment.<sup>59</sup> Finally, TracFone offers that, based on its experience in the broadband pilot program, the \$9.25 subsidy will not encourage meaningful broadband adoption, especially given the cost of Internet access devices.<sup>60</sup>

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<sup>54</sup> Comments of Internet Innovation Alliance at 10, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (asking that the Commission retain the \$9.25 monthly subsidy and continue the limitation of only one Lifeline benefit claimed per household).

<sup>55</sup> Comments of Michigan Public Service Commission at 5, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (imploring that the FCC establish a permanent Lifeline support amount of \$9.25 for fixed telephone and broadband service).

<sup>56</sup> Verizon Comments at 8 (submitting that the federal benefit amount should stay \$9.25, even for bundled voice and broadband).

<sup>57</sup> ARC Comments at 5.

<sup>58</sup> See AARP Comments at v, 13-14, 18.

<sup>59</sup> See Sprint Comments at 2, 18-21.

<sup>60</sup> See TracFone Comments at 20-21.

**V. COMMENTS DEMONSTRATE THE NEED TO PRESERVE STATE VARIATION AND THE FLEXIBILITY FOR A STATE TO CREATE ITS OWN ELIGIBILITY VERIFICATION SYSTEM.**

Comments demonstrate the need to preserve state variation and the flexibility for a state to create its own eligibility verification system. According to the Public Service Commission of Wisconsin (“PSCW”), its current system is effective at verifying almost all programs the FCC has included for Lifeline verification.<sup>61</sup> As such, PSCW believes that its current system should be the first and primary means of eligibility verification.<sup>62</sup> According to AT&T, Lifeline enrollment, eligibility verification, and de-enrollment should be implemented by the state agencies that manage SNAP in coordination with USAC, substantially easing the costs, burdens, and risks to providers and avoiding duplication of existing processes to qualify for other federal benefits.<sup>63</sup> Lifeline Joint Commenters submit that the Commission should not implement a one-size-fits-all national verifier because it would be inflexible and expensive.<sup>64</sup> Instead, the Lifeline Joint Commenters suggest that the FCC encourage more states to develop eligibility-verification databases by developing baseline standards akin to those it established for state duplicate

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<sup>61</sup> See Comments of Public Service Commission of Wisconsin at 6, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 28, 2015).

<sup>62</sup> See *id.* at 6-7.

<sup>63</sup> See AT&T Comments at 3, 5-7, 13-21. AT&T further offers that the FCC could use federal funds as either a carrot or stick to encourage state participation. See *id.* at 24-25.

<sup>64</sup> Comments of Lifeline Joint Commenters at 27.

databases.<sup>65</sup> Similarly, TracFone comments that third-party eligibility verification would duplicate state processes without much added benefit.<sup>66</sup>

GCI, along with such commenters, urge the Commission to allow, but not require, states to create their own eligibility verification system.

## **VI. LIFELINE PROVIDERS SHOULD NOT BEAR THE COSTS OF MANDATORY THIRD-PARTY ELIGIBILITY VERIFICATION.**

Lifeline providers should not bear the costs of mandatory third-party eligibility verification. This stance enjoys the support of numerous commenters. Indeed, the American Cable Association comments specifically that providers should not have to pay for third-party verification.<sup>67</sup> By the same token, the Navajo Nation Telecommunications Regulatory Commission<sup>68</sup> and the National Tribal Telecommunications Association<sup>69</sup> express concern about the negative costs and implications third-party eligibility verification might pose to Lifeline

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<sup>65</sup> *Id.* at 29. *See also* Comments of the Telecommunications Regulatory Board of Puerto Rico at 16-17, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (asserting that states should be able to opt out of national verification, but only with a contingency plan in place to allow them to quickly opt back in).

<sup>66</sup> *See* TracFone Comments at iii.

<sup>67</sup> *See* ACA Comments at 5, 8-9.

<sup>68</sup> *See* Comments of the Navajo Nation Telecommunications Regulatory Commission (NNTRC) to the Second Further Notice of Proposed Rulemaking at 14-15, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 28, 2015) (commenting that third-party agency would be viewed unfavorably by Native Americans and that self-certification is effective and cost-efficient).

<sup>69</sup> *See* Comments of the National Tribal Telecommunications Association at 11-12, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (explaining that establishing a third-party verifier in Tribal areas would severely weaken the ability of tribal governments to effectively advocate for their citizens).

providers. Other commenters express general discontent about the potential non-monetary costs that could be borne by Lifeline providers if third-party eligibility verification is implemented.<sup>70</sup>

A metered approach, such as one that would charge providers on a per-use basis for queries to NLAD or a third-party verification system, is particularly unwise. That would deter rather than encourage use of the system. Currently, many providers query NLAD early in the application process, to avoid wasting the time of applicants and the resources of providers and USAC in cases where ineligibility can readily be determined. Because data in NLAD changes so rapidly, some also re-query later in the application process, to make sure that a previously positive response remains so when an application is finalized and ready for submission. Charging for every touch will, of course, penalize such careful behavior and lead to greater risk and waste of resources.

Further, Verizon points out that by charging Lifeline providers, the Commission would be requiring additional contribution to the costs of universal service from those providers. This is inconsistent with how the FCC treats other administrative costs.<sup>71</sup> In any event, imposing costs on Lifeline providers is the functional equivalent of cutting support levels, neither of which the Commission should do.

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<sup>70</sup> *See, e.g.*, Commnet and Choice Comments at 7, 13-14 (commenting that a third-party eligibility verification service would be a needless duplication of the NLAD system and cause needless disruption during the transition); NTCA Comments at 5 (asserting that establishing a third-party verifier would “introduce another layer of potential failure and possible deviation from Commission standards, thus possibly increasing the instances of either deliberate or inadvertent misuse of funds”).

<sup>71</sup> *See* Verizon Comments at 4.

**VII. COMMENTERS AGREE THAT THE COMMISSION SHOULD NOT REQUIRE A 24-HOUR CUSTOMER SERVICE NUMBER FOR SUBSCRIBER DE-ENROLLMENT WHEN A CARRIER DOES NOT PROVIDE 24-HOUR CUSTOMER SERVICE FOR NON-LIFELINE CUSTOMERS.**

Requiring carriers to maintain a 24-hour customer-service number for subscriber de-enrollment<sup>72</sup> is unreasonable when a carrier does not maintain a 24-hour number for its non-Lifeline customers, as recognized by the majority of commenters that addressed this issue.<sup>73</sup> The record does not provide evidence to support that Lifeline customers are hampered in their ability to de-enroll due to customer service hours that are too limited. As the ITTA points out, the proposed 24-hour de-enrollment line is unnecessary, and the supporting evidence that some subscribers cannot readily reach their Lifeline provider is merely generalized and anecdotal.<sup>74</sup> Even assuming there is some consumer benefit in a 24-hour customer service line,<sup>75</sup> those

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<sup>72</sup> See *NPRM* ¶ 151 (“We seek further comment on requiring Lifeline providers to publicize their 24-hour customer service number in a manner reasonably designed to reach their subscribers and indicate, on all materials describing the service that subscribers may cancel or de-enroll themselves from Lifeline services, for any reason, without having to submit any additional documents.”).

<sup>73</sup> See, e.g., ARC Comments at 16 (commenting that the existing customer service available from a carrier is sufficient to the needs of a Lifeline customer); TracFone Comments at 51 (expressing that a customer service number during normal business hours is sufficient, provided ETCs are required to de-enroll customers within 5 business days); Verizon Comments at 6 (asserting that there is no evidence that providers’ existing options for customer service do not provide sufficient opportunity to de-enroll from Lifeline); Windstream Comments at 9 (stating that the 24-hour customer service proposal is unnecessary and overly burdensome and costly); Comments of ITTA at 28-30, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (commenting that the proposed de-enrollment procedures (24-hour line) are unnecessary) (“ITTA Comments”); and USTelecom Comments at iv, 13-14 (asserting that a 24-hour customer service line is not necessary as many larger and mid-sized providers already provide phone support to their customers on a broad range of issues, seven days a week for extended hours).

<sup>74</sup> See ITTA Comments at 28-30

<sup>75</sup> Oklahoma Corporation Commission Comments at 11 (arguing such a service would mitigate some delay and confusion that customers experience in the de-enrollment process).

presumed benefits are outweighed by the costs where a provider would need to staff a customer service line for 24 hours solely for the purpose of serving its Lifeline customers – which can be a small fraction of a provider’s customer base. GCI urges the Commission instead to require that Lifeline customers have the same hours of availability for enrollment, de-enrollment, and billing as all other customers, particularly when the provider serves more than a *de minimis* number of non-Lifeline customers.<sup>76</sup> Adding yet another special Lifeline-only administrative burden will further deter new entrants and competition in what is already a remarkably bureaucratic and burdensome program.

## **VIII. OTHER ISSUES**

### **A. Commenters Agree That Subscriber-Originated Texts Should Count as Usage.**

As expressed in GCI’s initial comments, subscriber-originated text messages should count as usage.<sup>77</sup> This position is supported by many commenters. Indeed, the ARC,<sup>78</sup> AARP,<sup>79</sup>

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<sup>76</sup> See GCI Comments at 27.

<sup>77</sup> See GCI Comments at 23 (“There is no reason to think they value a Lifeline-supported texting service less than voice, and the Commission’s proposal to count texting as usage is a well-supported recognition of that development.”).

<sup>78</sup> See ARC Comments at 15 (expressing that consumers should not be punished for choosing to use a device in one manner (text messaging) as opposed to another (voice calling)).

<sup>79</sup> See AARP Comments at 41 (commenting that texts should count as usage).

National Association of the Deaf,<sup>80</sup> Sprint,<sup>81</sup> TracFone,<sup>82</sup> and COMPTTEL<sup>83</sup> all encourage the Commission to allow texts to count as usage. Doing so would ensure that the Lifeline program remains current, relevant, and responsive to the changing needs and preferences of low-income consumers. Allowing texts to qualify as usage would also assist the Commission in working toward its goal of reducing waste, fraud, and abuse in the Lifeline program.

**B. Commenters Agree That the Commission Should Create Standardized Forms, but Must Correct Errors on USAC’s Model Forms.**

As expressed in GCI’s initial comment submission,<sup>84</sup> the Commission should create “an official, standardized initial certification form [and a] recertification form . . . .”<sup>85</sup> Other commenters agree with GCI’s view.<sup>86</sup> For instance, according to ARC, if the Commission

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<sup>80</sup> See Comments of National Association of the Deaf et al. at 9, WC Docket Nos. 11-42, 09-197 & 10-90 (filed Aug. 31, 2015) (requesting that the Commission allow for texting in usage).

<sup>81</sup> See Sprint Comments at 2 (submitting that text should count as usage “for purposes of Section 54.407(c)(2)” because, *inter alia*, texts allow Lifeline users to save their voice minutes).

<sup>82</sup> See TracFone Comments at 47-50 (commenting that sending and receiving texts should count as usage under the current 60-day non-usage period, as it is the preferred method of communication for many consumers, including the deaf and hard of hearing community).

<sup>83</sup> See COMPTTEL Comments at 27 (weighing in that texts should count as usage for the purpose of determining that service is active).

<sup>84</sup> See GCI Comments at 23-24.

<sup>85</sup> See *NPRM* ¶ 205 (“To increase compliance with the rules, facilitate administration of the program and to reduce burdens placed upon ETCs, the Commission proposes creating an official, standardized initial certification form, annual recertification form and ‘one-per household’ worksheet.”).

<sup>86</sup> See, e.g., AARP Comments at 34-35 (urging the FCC to mandate standardized, written disclosures, statements, and terms and conditions); New America’s Open Technology Institute Comments at 9-10 (suggesting that the FCC establish a standardized disclosure form to help consumers understand the myriad services and pricing schemes offered by broadband providers); NY PSC Comments at 6 (opining that recertification forms should be standardized, simplified, and clarified); Oklahoma Corporation Commission Comments at 15 (same); AT&T Comments at 36 (same); COMPTTEL Comments at 24 (asserting that the IEH

requires a standard enrollment and certification forms, the Commission should create those forms.<sup>87</sup> In a slightly different vein, the Michigan Public Service Commission does not oppose the FCC creating a standard form for the “one-per-household worksheet,” but the PSC does express a concern that standardizing the initial and annual certification forms may be difficult.<sup>88</sup> Certification forms would need to take account of state variations in programs establishing eligibility but could still be largely standardized.

**C. Commenters Agree That the Commission Should Not Make Wireless Emergency Alert Participation Mandatory for Lifeline.**

As previously expressed,<sup>89</sup> GCI does not believe that Lifeline providers should be singled out for the additional burden of making provision of Wireless Emergency Alerts (WEA, also known as Commercial Mobile Alert Service, or CMAS) mandatory for their Lifeline service.<sup>90</sup> Rather, as Sprint urges, participation should remain voluntary.<sup>91</sup>

**D. Commenters Agree That Any Training and Certification Requirements Should Focus on Personnel Making Final Eligibility Determinations, Rather Than All Customer-Facing Personnel.**

GCI reiterates<sup>92</sup> that requiring that a company officer certify the training of all customer-facing personnel, and that all customer-facing personnel sign attestations as to training, and that

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worksheet and Lifeline Certification forms should be streamlined); *and* WTA Comments at 22 (maintaining that there should be universal forms for consumer certification, recertification, and household worksheets).

<sup>87</sup> ARC Comments at 15.

<sup>88</sup> *See* Michigan PSC Comments at 16.

<sup>89</sup> *See* GCI Comments at 29.

<sup>90</sup> *See NPRM* ¶ 155 (“We seek comment on ways to increase Lifeline provider participation in WEA.”).

<sup>91</sup> *See* Sprint Comments at 34 (noting that it “would not oppose Commission outreach to encourage great carrier participation . . . .”)

<sup>92</sup> *See* GCI Comments at 30.

the carrier keep all of these documents,<sup>93</sup> will generate yet more paperwork burden for little benefit. Similarly, AT&T agrees that monthly officer certification is “overkill.”<sup>94</sup> Lifeline Joint Commenters point out that mandatory officer training certification discourages carriers from providing Lifeline services.<sup>95</sup> Verizon notes that requiring such training would cause Verizon to collect thousands of signatures of its employees that interface with customers verifying they have completed Lifeline training, a resource-heavy process.<sup>96</sup> Similarly, USTelecom says that the proposal that ETCs collect signatures of “all covered individuals certifying that they completed sufficient training on the Lifeline rules” is too burdensome.<sup>97</sup> While there are certainly burdens associated with mandatory training, GCI does not object to requiring certification of training for specialized quality-control personnel who must sign off on all Lifeline applications – or to requiring training of all customer-facing personnel only if the ETC does not create a quality control staff that reviews and makes a final eligibility determination for all Lifeline applicants.<sup>98</sup>

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<sup>93</sup> See *NPRM* ¶ 210 (“In order to increase ETC accountability and compliance with the Lifeline rules, we propose to require an officer of an ETC to certify on each FCC Form 497 that all individuals taking part in that ETC’s enrollment and recertification processes have received sufficient training on the Lifeline rules.”).

<sup>94</sup> AT&T Comments at 38.

<sup>95</sup> See Lifeline Joint Commenters Comments at 95.

<sup>96</sup> See Verizon Comments at 6.

<sup>97</sup> USTelecom Comments at iv, 12-13.

<sup>98</sup> See GCI Comments at 30-31.

**IX. CONCLUSION**

GCI again urges the Commission to carefully consider the implications of the various Lifeline program reforms on Alaska, a state composed entirely of Tribal Lands, and the unique qualities of Lifeline providers generally, and to measure its proposals against the Commission's goals for Lifeline reform.

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