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October 15, 2015

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

Re: *Ex Parte* disclosure pursuant to 47 C.F.R. § 1.1206(b) in WC Docket Nos. 11-42, 09-197, 10-90

Dear Ms. Dortch:

On October 15, 2015, the following individuals, representing the Leadership Conference on Civil and Human Rights Media and Telecommunications Task Force—Sean Mickens, Broadband and Technology Fellow, National Urban League; Hazeen Ashby, Legislative Director for Research & Policy, National Urban League; Todd O'Boyle, Program Director, Common Cause; Dara Baldwin, Senior Public Policy Analyst, National Disability Rights Network; Andy Lomeli, Policy Associate, National Hispanic Media Coalition; Cheryl Leanza, Policy Advisor, United Church of Christ, OC, Inc.; Corrine Yu, Managing Policy Director, The Leadership Conference on Civil and Human Rights; Irasema Garza, Policy Advisor, National Council of La Raza; Kham S. Moua, Policy and Communications Manager, OCA - Asian Pacific American Advocates; Olivia Wein, Telecom Project Lead Attorney, National Consumer Law Center; Brian Thorn, Strategic Research Associate, Communication Workers of America; Debbie Goldman, Telecommunications Policy Director, Communication Workers of America, and Gabe Rottman, Legislative Counsel, Policy Advisor American Civil Liberties Union—met with Rebecca Weinstein, OCH; Jay Schwarz, WCB; Chas Eberle, WCB; Eric Feigenbaum, OMR; Russell Hsiao, OCH; Garnet Hanly, WCB; Gigi Sohn, OCH; Stephanie Weiner, OCH; Rebekah Goodheart, Legal Advisor to Commissioner Clyburn and Jodie Griffin, WCB.

In our meeting the members of the Leadership Conference Media and Telecommunications Task Force expressed strong support for the Lifeline program and the need to move quickly to modernize Lifeline to include broadband. We were also pleased to note the broad array of interests that have weighed in on the need for everyone in society to be connected to broadband.

We discussed the Task Force's Lifeline comments filed on August 31, 2015, which covered ensuring quality Lifeline voice and broadband service and pro-consumer reforms to the administration of the Lifeline program through the following recommendations:

- Adopt a functional standard for services eligible for Lifeline that would allow households to complete a variety of important online activities online, while also



establishing a clear demarcation of products that are of such low quality as to be undeserving of universal service support;

- Incentivize providers to offer the best services to consumers, possibly by offering more Lifeline support for higher-quality services and less for lower-quality services;
- Utilize market and Lifeline data to monitor utilization of the program;
- Continue vital support for mobile and voice-only services;
- Implement a centralized third-party eligibility verification system in phases, in a manner that will facilitate portability and consumer choice without negatively impacting Lifeline participants;
- Adopt participation as a goal for Lifeline and reject proposals that would inhibit it, such as proposals that would result in waiting lists, loss of participant support mid-stream, or mandatory minimum payments;
- Create incentive grants to facilitate Lifeline reliance on state databases.

We also discussed how low-income households are not monolithic, but that it is all too common for low-income households to face hardships and sacrifices in paying for basic necessities from month-to-month, such as rent. For example, data shows that people with disabilities spend the vast majority of their incomes on rent.¹

If Commission staff would like to follow up on any of the above issues or other issues of interest to The Leadership Conference, please contact Corrine Yu, Leadership Conference Managing Policy Director at 202-466-5670 at yu@civilrights.org, or the Task Force Co-Chairs: Cheryl Leanza at cleanza@alhmail.com or 202-904-2168 and Gabriel Rottman at grottman@aclu.org or 202-675-2325.

Sincerely,

Cheryl A. Leanza

¹ See Technical Assistance Collaborative CCCD Fact Sheet: Priced Out in 2014, available at: <http://www.tacinc.org/media/52018/Priced%20Out%20in%202014%20Fact%20Sheet.pdf>.