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October 30, 2015

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 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 Ms. Dortch:

On October 28, 2015, Kathleen Abernathy, Executive Vice President of External Affairs of Frontier Communications ("Frontier") and I met with Rebekah Goodheart, Legal Advisor to Commissioner Mignon Clyburn. We discussed the attached presentation, which details Frontier's support for the Commission's efforts to modernize the Lifeline program to include broadband.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Sincerely,

/s/ AJ Burton

AJ Burton

cc: Rebekah Goodheart

Attachment

FCC Proposed Revisions to Lifeline Support

WC Docket No. 11-42

Kathleen Abernathy
AJ Burton
Frontier Communications

October 2015

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Frontier Support

- Frontier has long supported Lifeline for voice services because it affords low-income consumers critical access to communications capabilities.
- Given the life-changing benefits associated with broadband capability and access, it is time to modernize the Lifeline program to include broadband.
- A consistent, uniform, and nationwide Lifeline program expanded to support broadband is consistent with the underlying policies and goals associated with creation of the Lifeline Program.

Lifeline Broadband Pilot Program

- Frontier volunteered to participate in the Lifeline Broadband Pilot Program.
  - Frontier tested the effect of the program on adoption and retention via a digital literacy incentive.
- *Frontier Findings (which are consistent with FCC findings)*:
  - Mid-range speeds (6 Mbps) were most in demand.
  - Subscribers opted not to take digital literacy training even if it would mean an additional service discount or free computer.
- *Additional Key FCC Findings*:
  - *Cost Matters*. Cost to consumers has an effect on adoption and which plans they choose.
  - *Digital Literacy Training Has Limited Effectiveness*. Digital literacy training has a limited effect on converting non-adopters.

Incorporating Broadband

- Frontier supports the Commission's efforts to modernize the Lifeline program to include broadband.
  - Broadband access and adoption promotes economic growth.
  - Almost all commenters support adding broadband as a Lifeline-supported service.
- Consistent with including broadband in the Lifeline and other Universal Service programs, the Commission should also reform the contribution methodology to include broadband.

Third-Party Eligibility Verifier

- Benefits of shifting Lifeline certification and verification review to a third-party eligibility verifier:
  - Streamlines the program;
  - Promotes carrier-participation;
  - Protects consumer privacy; and
  - Reduces potential for fraud and abuse.
- Substantial support in the record.
- California system provides a good model:
  - Consumers submit documents to verifier.
  - Verifier performs eligibility verification functions, including reviewing eligibility and certification, checking for duplicates, and managing recertification.
- Customers and carriers should have a single point of contact rather than 50 different eligibility verifiers.

A Portable Benefit Promotes Consumer Choice

- A 21st Century program deserves a 21st Century payment system.
- Transferring Lifeline benefits directly to consumers via a portable benefit:
  - Promotes consumer choice;
  - Recognizes that the consumer is in the best position to choose a service provider;
  - Streamlines administration; and
  - Promotes carrier participation.
- A Third-Party Administrator and a portable benefit eliminates complex questions about consumer privacy and avoids complex enrollment and de-enrollment procedures.
- Many stakeholders, including public interest groups and providers, support a portable benefit.

Minimum Service Standards

- Minimum service standards may be a good idea in some respects but must not prevent or limit consumer choice.
  - The Commission asks about setting a minimum speed for fixed Internet services, such as 10 Mbps/1 Mbps.
    - Certain rural consumers, however, may not currently have access to 10 Mbps/1 Mbps fixed Internet speeds and would thus be prevented from choosing to use Lifeline for a fixed Internet service.
    - Even if higher speeds are available, a minimum speed standard may prevent a customer from opting for a lower speed plan that may better meet their budget.
- Different speed standards for wireless and wireline is not technology neutral and discriminates against one technology or the other. The consumer should be able to choose their preferred service.
- If the Commission adopts minimum speed standards, any such standards should apply only to Lifeline-targeted services, as proposed by Public Knowledge, AT&T, and others.
  - Limiting minimum service standards in this manner could promote growth in standards of Lifeline-targeted service offerings while preserving consumer choice.