

March 21, 2016

Ms. Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: Notice of *Ex Parte* Communication, Lifeline and Link Up Reform Modernization WC Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service Support WC Docket 09-197; Connect America Fund WC Docket No. 10 -90

Dear Ms. Dortch:

This letter reports on a meeting held on March 17, 2016 at Davis Wright Tremaine LLC. The meeting included Jay Schwarz, Acting Wireless Deputy Division Chief, Federal Communications Commission (FCC) and Charles Eberle FCC Attorney Advisor, FCC. Representatives from the Multicultural Media, Telecom and Internet Council (“MMTC”) included Maurita Coley, Vice President and Chief Operating Officer; Dr. Nicol Turner-Lee, Vice President and Chief Research and Policy Officer; Dorrissa Griffin, Chief of Staff; Marcella Gadson, Marketing and Communications Director; and, DeVan Hankerson, Director of Research. Other individuals in attendance were part of MMTC’s Digital Equity Roundtable, a convening of national, regional, and local civil rights and social justice organizations that are listed in Exhibit One. The purpose of the meeting was to get briefed on the Commission’s Lifeline fact sheet¹ published on March 8, 2016.

During the meeting MMTC representatives urged the Commission to consider three main areas of concern: (1) the indirect consequences of entirely eliminating support for voice-only service for eligible Lifeline consumers; (2) the practicality of having Lifeline customers provide mandatory co-pays in order to receive Lifeline benefits; and (3) concerns about whether more

¹See FCC, FACT SHEET ON LIFELINE MODERNIZATION PROPOSAL: CHAIRMAN WHEELER & COMMISSIONER CLYBURN PROPOSE RULES TO MODERNIZE LIFELINE PROGRAM TO PROVIDE AFFORDABLE BROADBAND FOR LOW-INCOME AMERICANS (Federal Communications Commission) (2016), http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0314/DOC-338113A1.pdf (last visited Mar 17, 2016)

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funds will be allocated to support the Lifeline program, given the critical need that the program addresses for low-income communities. On the first point, FCC representatives provided further details on the proposal to “step-down” support for the voice-only service option by late 2019. Representatives from MMTC’s Digital Equity Roundtable urged the Commission to consider that low-income populations of color with limited access to high-speed broadband may be harmed if voice services were to be completely eliminated. On the second point, representatives also warned the Commission of the economic vulnerability of current Lifeline subscribers when prescribing any type of mandatory co-pay. Representatives felt that any additional “skin in the game” from potential Lifeline subscribers will pose additional challenges in the timeliness of payments, the ability to travel to payment centers, and the general affordability of this additional expense for consumers. On the final main point, representatives encouraged the Commission to understand that the population that they will be serving are historically disadvantaged populations and asked about how the budget would accommodate the growth of the program, especially with the coordination of the benefit with other public assistance programs. The FCC went through the specifics of the proposed budget reforms as part of their response to a series of questions.

Other concerns discussed included ensuring that the broadband access will enable telemedicine and telehealth services for eligible consumers. The Commission explained that the overall aim of the modernization effort is to upgrade the Lifeline program similar to other programs under the Universal Service Fund umbrella, which have already been updated with broadband. Commission staff also pointed out that the reforms are intended to make the program more competitive and efficient in its administration for other service providers to participate.

Finally, FCC staff referenced Commissioner Clyburn’s 2014 speech at the American Enterprise Institute where she outlined her vision for the future of Lifeline and its role in bridging the digital divide.² In her speech, the Commissioner discusses FCC reforms as, “modernizing the FCC’s Lifeline universal service program for the broadband era.”

The meeting closed with Commission staff reminding the Digital Equity Roundtable members about the FCC Open meeting at the end of March. MMTC also encouraged the Commission to continue outreach to groups that are part of the Digital Equity Roundtable when considering the value of Lifeline reform for historically disadvantaged households.

Respectfully submitted,

Nicol Turner-Lee

Nicol Turner Lee, Ph.D.
Vice President and Chief Policy &
Research Officer

² See COMMISSIONER MIGNON CLYBURN REFORMING LIFELINE FOR THE BROADBAND ERA AMERICAN ENTERPRISE INSTITUTE NOVEMBER 12, 2014, https://apps.fcc.gov/edocs_public/attachmatch/DOC-330453A1.pdf (last visited Mar 18, 2016)

Exhibit One: MMTC Digital Equity Roundtable Member Organizations

1. Hazeen Ashby, National Urban League
2. George Bailey, NIH
3. Luis Belen, National Health IT (NHIT) Collaborative
4. Jennifer Blemur, National Black Caucus of State Legislators
5. Nsenga Burton, National Association for Multicultural Digital Entrepreneurs (NAMDE) (by phone)
6. Maurita Coley, MMTC
7. Muriel Cooper, Congressional Black Caucus Foundation (CBCF)
8. Marcella Gadson, MMTC
9. Dorrissa Griffin, MMTC
10. Carlos Gutierrez, LGBT Technology Partnership
11. Linda Haithcox, National Policy Alliance
12. DeVan Hankerson, MMTC
13. Kristal High, Politic365 (by phone)
14. Helen Holton, National Organization of Black County Officials (NOBCO) (representative sent)
15. Rosa Mendoza, Hispanic Technology and Telecommunications Partnership (HTTP)
16. Kham Moua, OCA-Asian Pacific American Advocates
17. Dr. Jonas Ohrberg, Ashford University and Activist
18. Steven Smith, Rainbow PUSH Coalition (by phone)
19. Leon Townsend, National Association of Neighborhoods
20. Nicol Turner-Lee, MMTC
21. Rhina Villatoro, National Hispanic Caucus of State Legislators

Others:

1. Danielle Frappier, Davis Wright Tremaine
2. Luisa Lancetti, T Mobile (observer)
3. Maris Sylla-Dixon, T Mobile (observer)
4. Marc Rubin, Tracfone (observer)