

March 22, 2016

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW,  
Washington, DC 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)

The undersigned organizations submit this letter as a follow-up to a letter dated February 10, 2016 in this docket by a group of organizations representing the needs of people with various disabilities (the “February 10 Letter”). We represent the needs of and advocate for millions of American citizens with various disabilities. Many Americans with disabilities have low incomes due to the challenges associated with their disabilities and therefore are eligible for and participate in the current Lifeline program. The wireless voice services provided by Lifeline have been critical in allowing Americans with disabilities to stay connected with their families, access health care services, seek employment and educational opportunities and to have the peace of mind to be able to call for help in emergencies. We write to urge the Commission to adopt reforms to the Lifeline program that would ensure that these vital services continue to be made available to Americans with disabilities.

As noted in the February 10 Letter, we applaud the Commission’s leadership on Lifeline and support many of the proposed reforms to the program, including the FCC’s proposal to expand the scope of Lifeline to include broadband. At the same time, however, we noted our concern that several of the proposed reforms to Lifeline would make it significantly more challenging for people with disabilities to participate in the program. One area of particular concern we highlighted was any proposal that would require Lifeline participants to contribute a co-pay in order to receive service. We noted that whether the requirement to make a payment was explicit (e.g. a so-called “skin in the game payment”) or whether it was implicit as a result of the Commission adopting minimum service standards that would exceed the cost of the current subsidy and force a contribution from Lifeline participants, the result would be the same – many needy and deserving people who have come to rely on the critical connection of Lifeline voice service but who can’t afford to make any level of payment would be forced to drop out of the program.

Unfortunately, this is precisely what would occur if the FCC adopts its draft proposals to eliminate the subsidy for standalone mobile voice and adopt its suggested aggressive minimum service standards for wireless phone connectivity. Lifeline providers will not be able to provide both unlimited voice minutes and the proposed minimum data offering without imposing a charge on consumers. This would force thousands of low income people with disabilities who

have come to rely on critical mobile voice services to drop out of the program due to their inability to make any level of contribution.

Another aspect of the FCC's proposal would force low-income disabled consumers who wish to maintain voice-only service to use landline voice service. Landline voice service is no substitute for the capabilities and convenience provided by mobile services, which people with disabilities have come to rely on to stay connected with friends and family and fully participate in society. Moreover, such a result ignores market trends and is directly contrary to one of the Commission's stated goals for Lifeline reform – to effectively and efficiently meet the needs of 21st Century users – and would only serve to further marginalize people with disabilities from society.

Rather than impose standards that would unnecessarily disenfranchise many current Lifeline participants, the FCC should heed the advice of the National Telecommunications and Information Administration and adopt reforms to the Lifeline program that promote consumer choice and maintain support for affordable voice service. Eligible Lifeline participants should be able to choose between continuing to receive wireless voice service or whether to receive broadband instead. Consumers should be able to decide what services or combination of services best meet the needs of participants in the Lifeline program.

We commend the FCC for its leadership in ensuring that Lifeline has been available to millions of low income people with disabilities to stay connected to and be productive members of society. While we support making broadband available to Lifeline participants, we do not believe that this should or must come at the expense of the continued availability of wireless voice service to those people with disabilities who have come to rely on this critical service.

Sincerely,

**American Association of People with Disabilities (AAPD)**

Helena Berger  
President and CEO  
/s/ Helena Berger

**The American Foundation for the Blind (AFB)**

Mark Richert, Esq.  
Director, Public Policy  
/s/ Mark Richert

**The Arc**

Annie Acosta  
Director of Fiscal and Family Support Policy  
/s/ Annie Acosta



**The Association of Assistive Technology Act Programs (ATAP)**

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/s/ Audrey Busch

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