



NATIONAL ASSOCIATION OF NEIGHBORHOODS

March 24, 2016

Re: *Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Lifeline and Link Up, WC Docket No. 03-109*

Comments from The National Association of Neighborhoods

Since its inception in 1985, the Lifeline Program has provided critical services to low-income consumers by ensuring that all Americans have access to advanced telecommunications and information services. The National Association of Neighborhoods' (NAN) mission is to improve the quality of life in the nation's most important communities – our neighborhoods. Mobile voice is a service that people rely on heavily – a fact that rings particularly true for low-income consumers. One concerning aspect of the Commission's draft Order is the proposed "phasing out" of mobile voice services. This proposal is very alarming considering that many Americans overwhelmingly rely on wireless voice services in their daily lives, as it offers a convenient and mobile option for making calls and staying connected at all times.

The Lifeline Program has been extremely successful at meeting this need for our most vulnerable populations and we want to be sure that access to mobile voice services is protected under the program. The Commission has done a good job at identifying areas in need of reform within the Lifeline Program, including: 1) the development of a National Eligibility Verifier system to deter fraud and waste in the program, 2) efforts to close the Homework Gap to ensure improved educational outcomes for students coming from low-income families, and 3) providing greater access to mobile broadband. NAN applauds the Commission for prioritizing these reform efforts.

However, as the Commission moves forward in reforming our nation's Lifeline Program to better meet the needs of a 21st Century digital economy, the Commission ought to remain mindful of the important service that mobile voice brings to low-income consumers. Reform efforts that make mobile voice services unaffordable and/or out of reach to Lifeline recipients only serves to disrupt important milestones that the program has impressively achieved.

Affordable access to mobile voice services is a cornerstone of the Lifeline Program. And while the National Association of Neighborhoods supports the Commission's attempt to implement changes to the Lifeline Program that will provide greater access to broadband, we want to see these changes implemented in a way that does not harm the millions of low-income consumers who depend on Lifeline support for one of their most basic needs – mobile voice service.

Sincerely,

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