



Black Women's Roundtable
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March 24, 2016

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, NW
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

Dear Chairman Wheeler,

The Black Women's Roundtable (BWR) applauds the Commission's efforts to help close the broadband affordability gap by modernizing the Lifeline program to include broadband. The BWR represents Black women who, in spite of attainments in higher education¹ and consistently leading all women in labor market participation, continue to be among the lowest paid² and often in need of Lifeline services. Lifeline reform has the potential to better serve and address the critical needs of Black women in accessing voice and broadband services. For these reasons, we are submitting this letter to outline our concerns with the proposed Lifeline reform measures.

1 National Coalition on Black Civic Participation-Black Women' Roundtable, *Black Women in the United State, 2014: Progress and Challenges*, March 2014. Accessed March 24, 2016. Available at <https://www.washingtonpost.com/r/2010-2019/WashingtonPost/2014/03/27/National-Politics/Stories/2FinalBlackWomenintheUS2014.pdf>

2 Id.

**Lifeline reform should expand,
rather than diminish, support of multiple technologies**

Many Black women, who are oftentimes the sole source of income for their households, rely on Lifeline's wireless and wireline voice services to stay connected to their families, employers, healthcare and social service providers, children's schools, childcare providers and 911-emergency services. While considering reforms to the Lifeline program, we urge the Commission to carefully consider the consequences of changes to/diminution of Lifeline's current voice service offerings on Black women, who rely on these services as essential to their daily living.

Any changes to the Lifeline program that would adopt minimum service standards or phase-out access to voice service could have a devastating impact on the lives of Black women and their families by creating the unintended consequence of leaving Black women stranded with no other low-cost and affordable options available to access voice services. Thus, we urge the Commission to consider implementing reforms that accommodate multiple technologies, including the ongoing support of wireless and wireline voice services.

**Lifeline reform should increased participation of broadband service providers
without requiring co-payments for services from consumers**

The major reason that American's do not subscribe to broadband service is cost.³ Forty-three percent of all people who do not subscribe to broadband at home say that affordability is the reason.⁴ Black women remain behind economically largely due to the double disadvantaged of the wage gap and over representation in low wage jobs. In fact, Black women are more likely than any group in America to work for poverty-level wages, thereby making them the most likely of all Americans to be among the working poor.⁵

In light of these facts, requiring co-payments from Lifeline subscribers fo broadband services would defeat the intended purpose of the program's reforms for many Black women who rely on Lifeline services. With the average cost of broadband service being \$90 per month⁶, even a subsidy of as high as 30% (or \$27) would require a consumer to pay \$63 per month for broadband service. We have learned from the Commission's own Lifeline broadband pilot program that requiring a co-payment severely deters adoption of broadband service among the low-income consumers the program is trying to reach.⁷ For this reasons, we urge the Commission to reconsider assessing a co-payment requirement for Lifeline broadband services.

3 Pew Research Center, "Home Broadband 2015", December 21, 2015. Accessed March 24, 2016. Available at <http://www.pewinternet.org/files/2015/12/Broadband-adoption-full.pdf>

4 Id.

5 Supra note 1

6 Geoghegan, Tom, "Why is Broadband More Expensive in the U.S.?", *BBC New Magazine*, October 28, 2013. Accessed March 24, 2016. Available at <http://www.bbc.com/news/magazine-24528383>

7 Wireline Competition Bureau Low-Income Broadband Pilot Program Staff Report, WC DOCKET No. 11-42, May 22, 2015. Accessed March 25, 2016. Available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2015/db0522/DA-15-624A1.pdf.

The National Eligibility Verifier should facilitate seamless and efficient eligibility and enrollment while maintaining consumer respect and privacy

The BWR is supports the Commission's efforts to improve and streamline the Lifeline eligibility process by utilizing a National Eligibility Verifier. We recognize and agree that this reform will reduce the occurrences of waste, fraud and abuse that can occur when placing the arduous task of eligibility verification on the Lifeline service providers. In moving forward with this reform, we urge the Commission to craft a procedure which ensures that the eligibility and enrollment process preserves dignity and respect of consumers who are in need of this assistance and maintains the highest standards of consumer privacy protections.

The proposed services offered by the Lifeline program reforms can be transformative in the lives of Black women and their families. We look forward to the Commission's continued leadership in making voice and broadband services available to all who need and want them.

Sincerely,

/s/ Melanie Campbell
President & CEO, National Coalition on Black Civic Participation
Convenor, Black Women's Roundtable

/s/ Joycelyn Tate
Senior Technology Policy Advisor
National Coalition on Black Civic Participation
Black Women's Roundtable