On 3/21/2016 Sprint filled this "NOTICE OF EXPARTE" in regard to proposed Lifeline changes.

http://apps.fcc.gov/ecfs/document/view?id=60001545229

In this notice the case is made by Sprint for "Technological Neutrality", I could not agree more.

- *"Competitive and technological neutrality Sprint stated that the draft Order's proposal to eliminate the Lifeline subsidy for mobile voice (in conjunction with the jump to unlimited minutes) but to retain this subsidy in full for wireline voice (with no change in performance standards) violates the long-held principle of competitive and technological neutrality. Since 1997, the Commission has consistently espoused competitive neutrality as a fundamental principle underlying universal service (pursuant to Section 254(b)(7) of the Communications Act), and such principle has been upheld by the Courts. The Commission must continue to foster competitive and technological neutrality by mandating a uniform $9.25 Lifeline subsidy to all eligible wireless and wireline service providers."*

The difference in minimum service standards between the technologies "wired broadband @ 150GB Cap" vs "wireless broadband @ 1GB" violates the long-held principle of "Technological Neutrality", and such principle has been upheld by the Courts.

The objective of expanding Lifeline to support broadband and fix the "homework gap" caused by lack of broadband access.

A smart phone with 1GB wireless data can be helpful and does have value to check email and do some research on the internet but the 4 to 5''size screen won't allow it to be a practical solution to use spreadsheets or other office applications. With that, 1GB wireless data does not allow for meaningful use of video lectures or instructional videos.

This violation of the long-held principle of "Technological Neutrality" creates 2 total different versions of internet connectivity:

- **Wired Broadband:**
    - Solid broadband access, a whole family can benefit from.
    - Affordable, market price for wired broadband data ranges from $0.20 up to $0.40 per GB, what results in an efficient use of collective funds to provide broadband to the ones in need.
    - Multiple devices can connect to single purchased broadband access point.

- **Cellular Data:**
    - Data limitations can't qualify this service as "broadband" (based on service properties, not technology)
    - Available for 1 Individual per household, only one person in household will benefit
    - 4 to 5'' screen size renders the device not suitable for doing homework.
    - Expensive, market price for wireless data ranges from $5, up to $10 per GB, very inefficient use of collective funds, and still won't provide meaningful broadband to the ones in need.
    - Only one device in household will have the ability to connect to the internet.

At this point, not a single cellular company offers a feasible broadband option or for that matter, a option that reasonably can be qualified as broadband.

The FCC has also made clear in their “2015 Broadband Report” that both technologies serve different purposes, if the solid argument is that these funds should help in providing broadband to narrow the homework gap, than by the FCC’s own reasoning “cellular data” should not qualify for Lifeline.

From experience I know the problems that arise when a family has to rely on cellular data only.

Since both broadband service providers in my area (Comcast and AT&T) are unwilling to deliver any wired broadband to my community, and from the daily frustrations dealing with limited internet access I can testify cellular data is not sufficient to serve as main broadband access.

This is another concern as well, a provider like AT&T has showed such disinterest in my area, that their wired network is neglected to an extent that even a 3mbps DSL connection is not available at my home, requiring a meaningful minimum Lifeline broadband standard, will create a needed financial trigger for ISP’s to upgrade their networks.

The funds are minor, but collectively they might add sufficient financial weight on the scale for ISP’s to upgrade their networks and at the same time, make sure that each collective dollar is used efficient and each collective dollar is spend on meaningful broadband.

Reversing previous argument, supplying collective funds for limited cellular data, will be a wasteful collective investment by spending funds on limited service, still leave people without meaningful broadband access and in a sense allow a company like AT&T to monetize on collective funds while neglecting their network/customers in these same areas.

If broadband is the goal, it should be technology neutral, and as Sprint noted, such principle has been upheld by the Courts, regardless if service is wired or wireless it needs to offer a minimum 150GB cap, ability to share connection as access point for multiple devices and a minimum speed of 10/1mbps.

Yes this does mean some people won’t be able to receive funding for broadband at this point, but this is not caused or related to the “excessive” minimum Lifeline standards, but the lack of availability of broadband service, mainly in “poor” and rural communities.

“Lifeline for Broadband”

Regards,

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