

April 28, 2016

The Honorable Tom Wheeler
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Chairman Wheeler:

We write to applaud your leadership in modernizing and reforming the Lifeline program to include affordable broadband Internet service to benefit millions of low-income households. As leaders in local government, representing communities large and small, the modernized Lifeline program has tremendous potential to improve the lives of our low-income residents and enhance the long-term prospects for our cities as a whole. We are committed to working with you in support of this important action, and in partnership through the implementation process.

We are pleased that the Commission has included a robust set of supports for broadband services as part of its reforms. By making high-speed Internet service eligible for Lifeline subsidies alongside the phone services that have traditionally received support, the Commission has tailored the program to 21st century needs of Americans. New options for combining mobile and fixed broadband and voice services will allow households to select the combination of technologies that will serve them best.

Importantly, these new supports for broadband will also complement efforts already underway in cities across the country. The new reforms will work alongside local efforts to make free, wireless broadband service more pervasive in public places and to expand residential broadband options for low-income Americans, increasing access to high-speed Internet and helping to bring about digital equity and inclusion.

Additionally, we applaud the Commission's commitment to create additional options for provider certification that have the potential to incentivize participation by new providers. Expanded alternatives, in turn, will make it easier for local leaders to craft programs that meet their communities' needs and for Lifeline participants to identify the service options that work best for them.

The undersigned local leaders further applaud the Commission's addition of "HUD Federal Public Housing Assistance" to the expanded list of factors that validate eligibility. The cities represented herein are home to hundreds of thousands of public housing residents. Nationwide, figures on public housing resident characteristics suggest that overwhelmingly, residents have very limited financial resources. An estimated 86% of public housing residents nationwide are either "extremely low-income" or "very low-income."¹ An additional 9% are "low-income," with earnings of approximately 80% of the median on an annual basis. The average annual

¹ See HUD Resident Characteristics Report, *available at* https://hudapps.hud.gov/public/picj2ee/Mtcsrcr?category=rcr_income&download=false&count=0&sorttable=table1.

income for residents is just over \$14,000, and 86% have incomes of just \$25,000 or less.² The average family income for a resident of a New York City Housing Authority unit, for example, is about \$23,000 per year. However, not all low-income people are eligible for programs that currently validate eligibility. A family may be income eligible for SNAP, for example, but have assets in excess of the limits permitted by the program. In light of this, allowing public housing residence to serve as an indicator of eligibility for the Lifeline program is a powerful way to ensure that the program achieves its mission of making broadband more affordable for low-income consumers.

Finally, as local leaders who are on the front line of the intersecting problems of connectivity, educational attainment, and economic opportunity, we look forward to working with the Commission through the implementation process. One area of particular importance is designing a structure that will allow and encourage aggregation of subsidies to support deployment at public housing developments. As noted above, the undersigned mayors represent hundreds of thousands of public housing residents and would encourage the Commission through implementation of the Lifeline program reform to create opportunities for the aggregation of subsidies that these individuals are eligible to receive as a means to overcome the significant barriers to broadband access and adoption these low income Americans confront. A program structured in this fashion would complement local efforts by creating a robust and dependable funding stream for service costs. Where localities have invested capital dollars to extend or improve infrastructure for public housing residents, including, but not limited to, broadband access, Lifeline funding could cover the costs of subscriptions or upgraded service, increasing the impact of such local projects and increasing the likelihood of similar future investments.

We enthusiastically commend the Commission for its thoughtful approach to Lifeline reform and modernization. As the Commission moves forward with updating the Lifeline program, we stand fully committed to a close partnership with you to bring connectivity within reach of low-income Americans.

Sincerely,

The Honorable Bill de Blasio, New York, NY
The Honorable Stephanie C. Rawlings-Blake, Baltimore, MD
The Honorable Edwin M. Lee, San Francisco, CA
The Honorable Eric Garcetti, Los Angeles, CA
The Honorable Edward B. Murray, Seattle, WA
The Honorable Andrew Gilich, Biloxi, MS
The Honorable Charlie Hales, Portland, OR
The Honorable Martin J. Walsh, Boston, MA
The Honorable Tom Bates, Berkeley, CA
The Honorable Joel Robideaux, Lafayette, LA
The Honorable Luke A. Bronin, Hartford, CT
The Honorable Lawrence J. Morrissey, Rockford, IL

² See HUD Resident Characteristics Report, *available at* https://hudapps.hud.gov/public/picj2ee/Mtcsr?category=r_cr_income&download=false&count=0&sorttable=table1.

The Honorable William Peduto, Pittsburgh, PA
The Honorable Ras J. Baraka, Newark, NJ
The Honorable Paul R. Soglin, Madison, WI
The Honorable Thomas E. Blake, South Portland, ME
The Honorable Cynthia Mathews, Santa Cruz, CA
The Honorable Steve Adler, Austin, TX
The Honorable Dana Kirkham, Ammon, ID
The Honorable Peter d'Errico, Leverett, MA
The Honorable Melvin L. "Kip" Holden, Baton Rouge, LA
The Honorable John Woods, Davidson, NC
The Honorable Jill Boudreau, Mount Vernon, WA
The Honorable Sly James, Kansas City, MO
The Honorable Libby Schaaf, Oakland, CA
The Honorable David Narkewicz, Northampton, MA
The Honorable Mark Stodola, Little Rock, AR
The Honorable Jennifer W. Roberts, Charlotte, NC
The Honorable David Martin, Stamford, CT
The Honorable Frank G. Jackson, Cleveland, OH
The Honorable Ivy R. Taylor, San Antonio, TX
The Honorable Brian K. Housh, Yellow Springs, OH
The Honorable Stephanie A. Miner, Syracuse, NY
The Honorable David S. Gysberts, Hagerstown, MD
The Honorable John Oberst, Monmouth, OR
The Honorable John McArdle, Independence, OR
The Honorable Greg Fischer, Louisville, KY
The Honorable Clarence E. Anthony, National League of Cities

cc:

Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
The Honorable John Thune, Chairman
The Honorable Bill Nelson, Ranking Member
The Honorable Fred Upton, Chairman
The Honorable Frank Pallone, Ranking Member