

I agree that there is a need to add the income based criterion of 135% of the Federal Poverty Guidelines. In order to ensure that Tribal families who live in States that have their own Lifeline Program benefit from this new income based criteria it is critical that it be added to 47 CFR Sec. 54.509(c).

I also support the Boards recommendation to add TANF and National School Free Lunch to the federal default criteria and to encourage States to do the same. Many Native American Indian families are forced to live off their reservation for a wide variety of reasons and because they do and may be on Tribal TANF, they do not qualify for Enhanced Lifeline under the existing rules. If, however the States included TANF and NSFL to their list of criteria, these Tribal families would qualify.

I would also like to recommend that States work directly with Tribal Leaders PRIOR to determining the income certification procedure to ensure that there is a government to government relationship in this process.

I also would like to support the Joint Boards three recommendations for outreach. I'd like to add that states and carriers should be required to research what if any tribal organizations are currently conducting outreach for Enhanced Lifeline/Link-Up and coordinate their efforts.

Finally, I support the Joint Board's recommendation that the Commission encourage states to adopt and implement rules regarding disconnections. Washington State recently adopted a rule regarding reconnection for customer's who have unpaid balances. While there is a flaw in the rule (only customer's who were NOT receiving Tribal or State Assistance at the time of disconnection are eligible for the new rule) it will help thousands of families across the state.

Sincerely,

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Bay, WA 98357
EMAIL;PREF;INTERNET:traceyr@atniedc.com
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