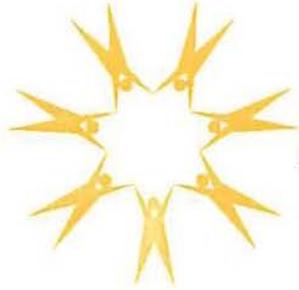


Department of Human Service Programs



sharing resources...building community

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Childcare & Family
Support Services

Commission for
Persons with Disabilities

Community Schools

Community
Learning Center

Kids' Council

Council on Aging

Fuel Assistance Program

Multi-Service Center;
Homeless Services

Office of Workforce
Development

Planning & Development

Recreation Programs

Youth Programs

TO: Jamie Susskind, Telecommunications Access Policy Division,
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FR: Fred Berman, Convener, Cambridge Continuum of Care;
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DA: November 19, 2009

RE: **WC Docket No. 03-109 - Re-Interpreting Eligibility for Life Line Services**

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On behalf of the City of Cambridge, MA and the Cambridge Continuum of Care, I am writing to urge the FCC to liberalize its interpretation of the one-phone-per-household rule governing provision of so-called Life Line service (like TracFone's SafeLink service).

The Cambridge Continuum of Care (CoC) is a network of providers, government agencies, and consumers working together to address homelessness in Cambridge. The Cambridge CoC includes representation from local shelters, transitional housing programs, and permanent supported housing programs serving homeless individuals, families, and domestic violence victims, as well as programs providing street outreach, case management, legal services, and other supportive services to that population.

Background / Statement of the Problem / Need for Life Line Services

A little over a year ago, TracFone began making its SafeLink wireless service available to low income households in Massachusetts, pursuant to FCC approval as an Eligible Telecommunications Carrier (ETC) in our State. Our understanding was that families or individuals enrolled in a Massachusetts-funded social service program or income eligible based on federal poverty guidelines would qualify for the so-called Life Line service.

TracFone did an excellent job of reaching out to homeless services providers, who responded enthusiastically... only to learn that clients living in shelters or congregate facilities would not be allowed to have their own phones.

TracFone explained that the FCC's one-phone-per-household rule barred them from offering phones to multiple clients living within the same shelter or transitional housing program. (The one-phone-per-household rule does not affect clients who have transitioned to scattered site permanent supported housing, because at that point, they have their own individual mailing addresses.)

(continued)



Ironically, the homeless individuals and families who are thus denied access to a SafeLink phone constitute a segment of the target population that needs the Life Line service the most.

Homeless shelter and transitional housing residents are among the poorest residents of the State. Many are recipients of SSI or TANF or EAEDC (the Massachusetts equivalent of General Relief, which provides about \$300/month); many more have no income at all. So there is no question that they qualify under the broader eligibility guidelines.

The only problem is that the shelter or other congregate facility that they live in doesn't afford them a unique address with which to qualify for Life Line. They can use their shelter address to register to vote, but they can't use it to qualify for emergency telephone service.

While some shelters offer beds to homeless individuals on an extended stay basis (say, for a few months at a time, while they are working to stabilize their lives), other shelters (like our local Salvation Army) limit stays to a few days at a time, after which the individual needs to find an alternate shelter until they are allowed to return, say, in a week. Homeless individuals who are thereby required to transition from shelter to shelter often use a drop-in program or Multi-Service Center as a "home base" for receiving assistance, but depend upon a PO Box in order to receive mail. These individuals are likewise denied access to a Life Line phone under the existing interpretation of the one-phone-per-household rule.

Because the benefits of making telephone service available to such homeless individuals and families are obvious, I will only briefly mention them:

- The ability to make and receive calls related to employment and housing. In the absence of a personal phone, incoming calls must go to a shelter or program switchboard or to a public telephone located in the facility -- either of which sends the wrong message to potential employers and landlords. As an alternative, Massachusetts providers have been able to offer discounted voicemail services to homeless clients, but the delays -- and cost -- attendant to communicating via voicemail (which must be frequently checked on a pay phone) have obvious adverse consequences.
- The ability to receive messages from and otherwise stay in touch with case managers and other service providers (health, mental health, benefits counselors, employment services counselors, lawyers, child care and school-based providers, etc.). The reasons for being reachable by all of these providers are obvious. The challenges such providers face in reliably and quickly contacting such clients can be daunting: unlike most of "us" in the mainstream -- who walk around with a cell phone, are reachable during the day at our jobs, and routinely check our email -- homeless individuals and families are often hard to locate and harder to contact ... particularly homeless individuals whose base is a shelter that is closed during the daytime (government funding only pays for overnight shelter, not for daytime staffing).
- The ability to stay in touch with family and friends. Although social contact may sound like a trivial reason for affording someone emergency phone service, it is not. Homelessness is one of the most traumatic and depressing experiences an individual or family can go through. To the extent that homeless people are able maintain a sense of connection to family and friends, they are significantly more likely to make the transition out of homelessness and back into the community.

Proposal

We urge you to develop a simple and straightforward mechanism whereby shelters and other congregate residences whose residents are currently being denied Life Line services can apply for waivers of the current policy.

Under such a waiver program, providers like TracFone would have a simple form which could be completed by a shelter, transitional housing program, halfway house, or other group residence (testimony by the National Consumer Law Center enumerates the different kinds of residences adversely affected by the one-phone-per-household policy) naming and describing the residence, and otherwise establishing its authenticity (e.g., as a program of a non-profit organization, as a recipient of government funding, as a municipally licensed group home or congregate residence, etc.).

One such a form was on file with the Life Line provider, residents at the named facility would be entitled to receiving Life Line telephone service, as if they had their own private residence. The fact that a client's mailing address was a PO Box would not harm their chances of receiving Life Line service, provided they could document that they were staying at a qualified residence.

There are occasional instances (e.g., certain substance abuse treatment facilities) where a provider might not want residents to be able to obtain their own cell phones. In such cases, the provider would not apply for the waiver, and residents would be unable to obtain Life Line services by documenting their residence at such facilities.

With the proposed waiver mechanism in place, TracFone and other Eligible Telecommunications Carriers would finally be able to make Life Line services available to some of the most needy individuals and families in the community, and thereby help the FCC and Congress more fully realize the intent of federal law calling for Universal Access to Telecommunications.

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Thank you for your consideration of our testimony, and for the concern shown by revisiting program guidelines.