

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	

TO: Federal-State Joint Board on Universal Service

COMMENTS OF PR WIRELESS, INC.

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SUMMARY

It has been a decade since the Commission last sought guidance from the Federal-State Joint Board on Universal Service regarding the policies, objectives, and administration of the Commission's low-income universal service programs. As the Commission has observed, the landscape of the telecommunications marketplace has dramatically changed in those ten years.

Two changes have been particularly significant: First, the use of mobile telephones has become increasingly prevalent throughout the Nation's states and territories. And, second, as the Commission notes in the *Referral Order*, "high-speed broadband service has become an essential mode of communication for many Americans"

The Joint Board, in developing recommendations regarding eligibility, verification, and outreach issues associated with the Lifeline and Link Up programs, should focus on these changed circumstances and ensure that the impact they are having on consumers' use of telecommunications and information services is reflected in these programs.

Specifically, the Joint Board should recommend that the broadband Lifeline program use eligibility criteria that are the same or similar to those used for the existing program. Avoiding more stringent criteria would help ensure that low-income consumers no longer lag behind other consumers in gaining access to advanced broadband services.

The Joint Board also should recommend liberalizing income-based Lifeline eligibility criteria, because doing so would help open the door to both traditional and wireless telephone service, and to broadband service, for many households that have limited financial resources but are currently excluded from the Lifeline program.

In addition, in acknowledgment of the fact that the shift to wireless services is resulting in households having multiple wireless telephone accounts, sometimes in conjunction with wireline service, the Joint Board should recommend eliminating the restrictive one-per-household rule.

Similarly, the Joint Board should recommend that residents of homeless shelters be permitted to automatically qualify for Lifeline and Link Up assistance, and that the Commission should abolish the restrictive prohibition against customers receiving Lifeline discounts from multiple service providers. At a minimum, if this prohibition is retained, then carriers should not have the burden of policing whether particular customers are receiving duplicate Lifeline support.

As another means of facilitating wider access for low-income consumers to wireless and broadband services (as well as traditional wireline telephone service), the Commission should encourage states and territories to use automatic enrollment processes for Lifeline assistance, so long as these processes do not inadvertently disqualify eligible consumers and do not result in any anticompetitive effects. It would not be appropriate, however, for states or territories to be required to provide automatic enrollment because some states or territories may lack sufficient funding mechanisms or face other obstacles.

Finally, PR Wireless believes that current Lifeline outreach guidelines have worked effectively, eliminating any need for the Commission to attempt the difficult task of codifying specific outreach requirements. The guidelines should be retained because they are sufficiently detailed but have enough flexibility to be applied in areas with varying demographics, cultures, and other characteristics.

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COMMENTS OF PR WIRELESS, INC.

PR Wireless, Inc. (“PR Wireless”), by its undersigned counsel and pursuant to the *Public Notice* issued by the Commission on June 15, 2010,¹ hereby submits comments relating to various eligibility, verification, and outreach issues discussed in the *Referral Order*.²

I. INTRODUCTION AND BACKGROUND.

PR Wireless is an Eligible Telecommunications Carrier (“ETC”) in Puerto Rico, doing business under the “Open Mobile” brand. PR Wireless has been eligible for support from the High Cost and Low Income programs of the federal Universal Service Fund (“USF”) since 2007. PR Wireless is a leader in utilizing federal USF support to make wireless telephone service accessible in rural, high-cost areas, and affordable to low-income citizens.

¹ Federal-State Joint Board on Universal Service Seeks Comment on Lifeline and Link Up Eligibility, Verification, and Outreach Issues Referred to Joint Board, CC Docket No. 96-45, WC Docket No. 03-109, Public Notice, FCC 10J-2, rel. June 15, 2010 (“*Public Notice*”). Comments are due not later than July 15, 2010. *Id.* at 1.

² *Federal-State Joint Board on Universal Service, Lifeline and Link Up*, CC Docket No. 96-45, WC Docket No. 03-109, Order, rel. May 4, 2010, 2010 WL 1800713 (“*Referral Order*”).

The territory of Puerto Rico presents severe challenges to efforts by carriers and regulators to increase telephone subscribership. Puerto Rico is entering its fifth consecutive year of negative Gross Domestic Product growth.³ The territory has a median income level barely more than a third of the income level of the mainland United States, and over 40 percent of Puerto Rican families live below the poverty level. Puerto Rico's unemployment rate is nearly double that of the U.S. mainland. In large part because of these challenges, telephone penetration—wireless in particular—lags far behind that of the U.S. mainland.⁴

Despite these challenges, PR Wireless has taken a leading role in increasing the availability of wireless service on the island. While there are five other wireless service providers operating on the island, only PR Wireless is fully committed to a pay-in-advance, no-contract business model with unlimited local calling. To ensure that potentially qualifying consumers are made aware of the availability of Lifeline benefits, PR Wireless has put in place a community relations program that has now targeted more than 400 communities throughout the island.

³ See Global Insight, Feb. 2010.

⁴ PR Wireless recently presented detailed information to the Commission regarding economic conditions in Puerto Rico, demonstrating that these conditions warrant an expansion of Lifeline support for Puerto Rico and other insular areas facing similar economic challenges and hardships. See PR Wireless Comments, WC Docket No. 03-109, filed June 7, 2010, at 3-5. PR Wireless observed that:

By virtually any measure, the citizenry of Puerto Rico are very poor compared to that of the mainland United States. The median income for households in Puerto Rico is \$18,610, compared to a median income of \$52,175 for all households in the United States. Per capita income in Puerto Rico is \$10,064, compared to \$27,466 for the United States overall. The unemployment rate in Puerto Rico in April 2010 was 17.2 percent, compared to an unemployment rate of 9.9 percent for the United States as a whole. In Puerto Rico, 41.4 percent of all families are below the poverty level, and 49.6 percent of all families with related children under 18 years of age are below the poverty level. In the United States as a whole, 9.6 percent of all families are below the poverty level, and 14.9 percent of all families with related children under 18 years of age are below the poverty level. . . . Although the Commission found that overall telephone penetration in Puerto Rico is only “somewhat” lagging behind the U.S. mainland (91.9 percent vs. 98.2 percent), wireless subscribership on the island lags significantly more at 64.3 percent compared to 90 percent on the mainland (based on 2008 figures).

Id. at 3-4 (footnotes omitted).

Due to its consumer-friendly pricing structure and its diligent Lifeline outreach program, PR Wireless has more than doubled its subscriber base in the last two years. As of June 30, PR Wireless has more than 110,000 Lifeline customers, which represents 40 percent of total Lifeline customers served by all carriers in Puerto Rico, wireless and wireline *combined*. PR Wireless is increasing the size of its Lifeline-dedicated sales force and expects to increase its Lifeline penetration levels significantly over the next several years.

II. DISCUSSION.

PR Wireless supports the Commission's referral of Lifeline reform issues to the Federal-State Joint Board on Universal Service ("Joint Board"). PR Wireless has worked aggressively and effectively to help increase telephone subscribership in Puerto Rico through its participation in the Commission's Lifeline program.

Thus, PR Wireless has an interest in a number of the issues raised in the *Referral Order*, including ensuring that the Commission develops policies that do not inadvertently hinder the ability of low-income consumers in Puerto Rico to fully participate in society. PR Wireless provides comment below on several issues presented for comment in the *Public Notice*.

A. Consumer Eligibility Requirements.

PR Wireless submits that the current Lifeline eligibility requirements under the federal rules are overly restrictive.⁵ In PR Wireless's experience, the current rules have the unintended effect of disqualifying numerous low-income consumers in Puerto Rico from accessing the telephone network.

1. Income-Based Eligibility.

PR Wireless recommends changing the federal Lifeline eligibility rules to allow consumers to qualify under the income-based criteria by demonstrating a household income at or below

⁵ See 47 C.F.R. § 54.409.

150 percent of the federal poverty guidelines. In July 2008, the Puerto Rico Telecommunications Regulatory Board (“TRB”) eliminated a 135 percent threshold (which the TRB had previously established, based on the threshold used by the State of Hawaii) and instead required that ETCs must use a threshold of 100 percent of the federal poverty guidelines used on the U.S. mainland. This threshold is \$22,050 for a family of four and \$25,790 for a family of five. Raising the threshold to 150 percent would mean an upper income limit of \$33,075 for a family of four and \$38,685 for a family of five.

The current income thresholds for Puerto Rico are unreasonably low as they disqualify many low-income families from receiving critical benefits. The current threshold for a family of four—\$22,050—is less than *half* the median family income for the United States, according to 2008 Census data.⁶ This threshold is unacceptably low given the reduced access to telephone service by families in that income range.

Although the Commission does not publish data for Puerto Rico regarding the percentage of households (at different income levels) with telephone service, Commission data for states on the U.S. mainland show that, in several states, telephone penetration levels dip significantly as household income declines.

For example, according to the most recent Commission data available,⁷ 97.9 percent of all households in Arizona with incomes of \$40,000 or more have access to telephone service, whereas the penetration figure for all households in Arizona with incomes between \$30,000 and \$39,999 is only 93.5 percent. In Georgia, telephone penetration for households with incomes of

⁶ U.S. Census Bureau, Selected Economic Characteristics: 2006-2008, accessed at http://factfinder.census.gov/servlet/ADPTable?_bm=y&-geo_id=01000US&-qr_name=ACS_2008_3YR_G00_DP3YR3&-ds_name=&-_lang=en&-redoLog=false&-format=.

⁷ See “Telephone Penetration by Income by State (data through March 2009)” (Ind. Analysis Div., Wire-line Comp. Bur., rel. May 2010) at Table 4: Percentage of Households With Telephone Service in March, accessed at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-297986A1.pdf.

\$40,000 or higher is 98.4 percent, while for households with incomes between \$30,000 and \$39,999 is only 95.4 percent. Similarly, 98.0 percent of households in Indiana with incomes of \$40,000 or higher have access to telephone service, whereas the penetration figure for households with incomes between \$30,000 and \$39,999 is only 96.3 percent.

Other states show similar declines in telephone penetration. For example, in New Mexico, telephone penetration for households with incomes of \$40,000 or higher is 99.1 percent, while for households with incomes between \$30,000 and \$39,999 the penetration level is only 92.0 percent. In Tennessee, telephone penetration for households with incomes of \$40,000 or higher is 98.2 percent, while for households with incomes between \$30,000 and \$39,999 the penetration level is only 95.4 percent.

In Texas, telephone penetration for households with incomes of \$40,000 or higher is 98.7 percent, while for households with incomes between \$30,000 and \$39,999 is only 95.7 percent. Finally, in Virginia, telephone penetration for households with incomes of \$40,000 or higher is 98.1 percent, while for households with incomes between \$30,000 and \$39,999 the penetration level falls to only 95.5 percent.

This data evidences a drop off in telephone penetration between households making \$40,000 or more, and those that make less.

If the income eligibility threshold were raised to 150 percent of the federal poverty guidelines, the thresholds for both a family of four and a family of five would be below \$40,000. This change would, therefore, make Lifeline discounts available to many households with very low incomes who currently cannot afford telephone service. It would also bring the Lifeline program in line with other federal benefits such as Low-Income Home Energy Assistance Program (“LI-

HEAP”) (150 percent in most states).⁸ By increasing the availability of telephone discounts to low-income individuals, this change would promote the congressional objective of advancing universal service.

PR Wireless also encourages the Commission to work in coordination with other federal agencies to develop appropriate poverty guidelines for the territories. No federal poverty guidelines are currently available for the territories, limiting these jurisdictions in their development of appropriate income-based eligibility programs. In the case of Puerto Rico, the TRB has established a threshold of 100 percent of the federal poverty guidelines for the U.S. mainland as the criterion for the income-based customer eligibility, but in PR Wireless’s view this criterion does not necessarily reflect the economic circumstances currently present in Puerto Rico.

PR Wireless also encourages the Commission to develop and publish data regarding household telephone service in Puerto Rico and the other territories, in order to provide these jurisdictions with better statistical data to better support communities with low telephone penetration.

2. Eligibility Criteria for Broadband Services.

The broadband Lifeline program⁹ should use the same or similar eligibility requirements as those used by the Commission in the existing Lifeline program, except that the list of eligible programs and income thresholds should be comprised of a single nationwide standard. Currently eligible households should automatically qualify for participation in the new broadband Lifeline program.

⁸ See U.S. Dept. of Health and Human Svcs., Admin. for Children and Families, LIHEAP Clearinghouse, accessed at <http://www.liheap.ncat.org/tables/FY2009/POP09.htm>.

⁹ The Commission is seeking recommendations from the Joint Board regarding whether to expand the Lifeline and Link Up program to make broadband services more affordable for low-income households. *Referral Order* at para. 12. See CONNECTING AMERICA: THE NATIONAL BROADBAND PLAN at 172-73 (rel. Mar. 16, 2010).

PR Wireless agrees with the Commission that “high-speed broadband service has become an essential mode of communication for many Americans in the last decade[,]”¹⁰ and that low-income consumers have fallen behind other consumers in their rate of adoption of broadband services.¹¹ This problem of low broadband adoption rates is particularly acute in Puerto Rico, where only 24 percent of households have high-speed broadband connections, compared to a national average of 60 percent.¹² In addition, in 21 percent of all census tracts in Puerto Rico households have no high-speed broadband connections, compared to a national average of only 1 percent of census tracts with no connections, and in 24 percent of all census tracts in Puerto Rico, no more than 10 percent of households have high-speed broadband connections, compared to a national average of 2 percent of census tracts with no more than 10 percent of households with connections.¹³

PR Wireless believes that the best way to facilitate the acceleration of broadband adoption rates by low-income consumers would be to mirror existing eligibility criteria, and to avoid the adoption of more stringent or burdensome criteria.¹⁴

3. Automatic Qualification of Certain Classes of Customers.

Residents of homeless shelters should automatically qualify for Lifeline and Link Up. Furthermore, as discussed in Section II.D., *infra*, residents of homeless shelters and other multi-family dwellings should not be disqualified by application of a “one per household” requirement

¹⁰ *Referral Order* at para. 12.

¹¹ *Id.*

¹² FCC, *High-Speed Services for Internet Access: Status as of December 31, 2008* (Feb. 2010), at 46 (Table 21). These statistics are based on connections with speeds over 200 kbps in at least one direction.

¹³ *Id.* at 50 (Table 23).

¹⁴ *See Referral Order* at para. 15.

that views a homeless shelter, subdivided multi-family dwelling, or other multi-unit residential or group living facility (such as a nursing home or assisted-living facility) as a single household.

Enabling the automatic qualification of homeless shelter residents would cure inadvertent inequities arising from application of the “one per household” rule, thus extending Lifeline and Link Up support to a class of consumers that should not be excluded as a result of this inadvertence. Providing for automatic qualification would ease burdens associated with application of eligibility criteria in a circumstance in which the use of such criteria would not be necessary in order to avoid waste, fraud, or abuse.

4. Documentation Requirements.

PR Wireless believes that no additional document collection requirements should be imposed at the federal level for Lifeline eligibility or verification at this time. If the Commission were to adopt rules that subject low-income consumers to restrictive and burdensome requirements, these consumers will be less likely to participate in the programs. In addition, if carriers are faced with costly and burdensome reporting requirements, or are assigned the *de facto* role of policing the way in which consumers seek to participate in the low-income broadband programs, then carriers may lack a sufficient incentive to aggressively utilize the low-income broadband programs.

The current Lifeline and Link Up programs rely upon various certification, self-certification, and verification requirements¹⁵ to protect against waste, fraud, and abuse, while at the same time avoiding more burdensome requirements that could prove to be counterproductive. PR Wireless encourages the Commission to retain existing requirements and use these mechanisms as a model for low-income broadband programs.

¹⁵ See 47 C.F.R. §§ 54.410, 54.416.

5. Consistency of Eligibility and Certification Requirements.

To increase efficiency and accuracy of reporting, a standardized set of eligibility and verification rules should be adopted for all states and territories. The federal Lifeline and Link Up mechanisms, while complementing programs in the states and territories, are nonetheless federal programs. It is, therefore, appropriate for the Commission to establish uniform rules governing the way consumers can qualify for the associated discounts.

B. Automatic Enrollment.

The Commission should continue to encourage, but not require, states and territories to use automatic enrollment for Lifeline. Automatic enrollment can help simplify consumer qualification and reduce the costs and administrative burdens involved in processing Lifeline eligibility during service initiation as well as verifying ongoing eligibility.

The Puerto Rico TRB requires ETCs to provide an automatic enrollment program for their customers. ETCs are also required to enter into a confidentiality agreement with the Puerto Rico Family Department in order to receive an electronic listing of customers eligible to participate in the Food Stamp Program. Based on this listing of eligible customers, ETCs then process an automatic Lifeline enrollment for all users of the Food Stamp Program.

PR Wireless recognizes the budget limitations of insular government agencies. Nonetheless, in PR Wireless's opinion, an automatic enrollment program should not be limited to only one federal program as the basis for establishing eligibility. The Commission should develop specific and uniform guidelines for states and territories regarding the implementation of automatic enrollment programs, including the utilization of more than one federal program for eligibility purposes, which should be followed by any jurisdiction that decides to establish an automatic enrollment program.

PR Wireless's support for automatic enrollment is conditioned on the enrollment mechanisms being designed to avoid inadvertently disqualifying otherwise eligible consumers, and to eliminate any anticompetitive effects. First, any automatic enrollment system must not prevent people from qualifying for Lifeline under the household income criteria. If an automatic enrollment mechanism requires customers to present government-issued identification or other official documentation, such a system would exclude many consumers who qualify by virtue of their household income but lack government-issued documentation. Automatic enrollment should, therefore, not be the sole means of qualifying for Lifeline.

In addition, automatic enrollment and electronic certification systems can be designed to identify instances of customers receiving Lifeline discounts from more than one carrier.¹⁶ However, any such system should be designed in a way that avoids potential anticompetitive effects. With multiple ETCs in a given area, customers clearly have a choice among carriers. Any centralized enrollment system would have to identify the ETCs in a particular individual's area, and then pick the ETC that would be submitted into the automated system with respect to that individual. Any automatic enrollment system would have to be structured in such a way as to ensure that incumbents are not selected by default and to eliminate any other potentially anticompetitive effects.

PR Wireless does not believe it would be appropriate for states or territories to be required under federal rules to provide automatic enrollment because of the lack of funding mechanisms to cover the cost of establishing and operating automatic enrollment programs. States and territories are best equipped to determine, through public proceedings, whether automatic

¹⁶ As discussed in Section II.E., *infra*, the Board should recommend eliminating the prohibition against consumers receiving Lifeline discounts from more than one provider. However, in the event the prohibition is retained, PR Wireless recommends that any automated enforcement of this restriction be designed with appropriate safeguards.

enrollment is appropriate. PR Wireless believes, however, that states and territories that decide on the implementation of an automatic enrollment program must follow uniform federal guidelines in order to avoid limitations on the eligibility of low-income consumers.

C. Electronic Certification and Verification of Eligibility.

In light of the “the widespread transition from paper-based environments to those effectively managed with electronic systems[,]”¹⁷ PR Wireless supports the idea of establishing a centralized electronic mechanism for certification and verification of Lifeline eligibility, subject to the mechanism containing sufficient safeguards to protect consumer privacy, as well as avoid inadvertent disqualification of eligible consumers and anticompetitive effects as discussed in Section II.B., *supra*. In case the Commission does not establish an electronic mechanism, PR Wireless recommends that the Commission reevaluate the current guidelines in order to establish a uniform set of rules for states and territories in order to avoid unnecessary burdens for ETCs and state and territorial commissions.

D. Modification of “One Per Household” Requirement.

PR Wireless urges the Joint Board to take this opportunity to re-examine the underlying premises of the one-per-household rule,¹⁸ and to recommend modifications to the rule in light of

¹⁷ *Referral Order* at para. 20.

¹⁸ The Commission’s one-per-household Lifeline rule indicates that “qualifying subscribers may receive assistance for a single telephone line in their principal residence.” *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, 12 FCC Rcd 8776, 8957 (para. 341) (1997) (“*First Report and Order*”), *aff’d in part, rev’d in part, remanded in part sub nom., Texas Office of Pub. Util. Counsel v. FCC*, 183 F.3d 393 (5th Cir. 1999), *cert. denied*, 530 U.S. 1210 (2000), *cert. dismissed*, 531 U.S. 975 (2000). *See Lifeline and Link Up*, WC Docket No. 03-109, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 8302, 8306 (para. 4) (2004) (“*Lifeline and Link Up Order*”). The rules prescribed by the Commission implementing its Lifeline program do not specifically codify the one-per-household limitation adopted in the *First Report and Order*, although the Commission’s Link Up rules specify that Link Up assistance involves “[a] reduction in the carrier’s customary charge for commencing telecommunications service for a single telecommunications connection at a consumer’s principal place of residence.” 47 C.F.R. § 54.411(a)(1). *See Smith Bagley, Inc.*, Comments, WC Docket No. 03-109, filed Nov. 20, 2009, at 3, n.6.

changes that are occurring with respect to consumers' utilization of telephone services. American households are increasingly viewing their subscription to more than one wireless telephone line as a necessity rather than a luxury, because individual members of the household need mobility for countless uses and activities, including seeking employment, in a mobile workplace, for participation in school activities, and for emergency situations.

As its orders make clear, the Commission is committed to ensuring that low-income consumers have access to affordable telecommunications and information services that are reasonably comparable to those available in urban areas.¹⁹ The Commission should examine whether the one-per-household rule has become too restrictive to serve as an effective vehicle for pursuing the agency's commitment to low-income consumers. Concerns about such restrictiveness are particularly relevant with respect to Puerto Rico, in light of the difficult economic conditions on the island and high levels of poverty among the island's population.

Replacing the one-per-household rule with eligibility standards that permit each adult in a single household to receive Lifeline assistance, subject to appropriate certification requirements, would be more in keeping with the Commission's commitment and more reflective of the importance of each adult having access to mobile communications in low-income communities, especially those in remote rural areas.

Should the Commission choose to retain the "one per household" requirement, the term "household," for Lifeline purposes, should be defined in a manner that ensures that low-income residents of homeless shelters, other group living facilities, and multiple-family dwellings are not lumped together and treated as members of a single household (which would have the effect of disqualifying many of these residents from participation in the broadband Lifeline program).

¹⁹ *Lifeline and Link Up Order*, 19 FCC Rcd at 8306 (para. 3).

E. Duplicate Claims for Lifeline Support.

As discussed in Section II.D., *supra*, the Joint Board should recommend changes to the “one per household” requirement that reflect the increased reliance of low-income populations on mobile wireless service both inside and outside the home. As part of these changes, the Joint Board should consider recommending that the Commission do away with the prohibition on customers receiving Lifeline discounts from multiple providers.

The Commission has a mandate from Congress to ensure that consumers across the Nation, “including low-income consumers[.]” have access to telecommunications and information services that are reasonably comparable to those available in urban areas, at prices reasonably comparable to those in urban areas.²⁰ According to the most recent National Health Interview Survey published by the Centers for Disease Control and Prevention, 62.5 percent of adults have both a landline and wireless telephone service.²¹ Because consumers across the country typically have both wireline and wireless service, the Commission’s “reasonable comparability” principle includes a mandate to ensure that low-income consumers have access to affordable wireline and wireless service, should they choose to have both.

Should the prohibition on receiving discounts from multiple providers be retained, PR Wireless urges the Joint Board to recommend that carriers are not responsible for ensuring that a particular individual does not receive Lifeline discounts from multiple providers. PR Wireless notes that this clarification requires no rule change whatsoever, as the Commission’s rules currently provide for customer self-certifications under penalty of perjury.

²⁰ 47 U.S.C. § 254(b)(3).

²¹ “Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, July-December 2009” (rel. May 12, 2010) at Table 1.

Nonetheless, Universal Service Administrative Company (“USAC”) auditors have been requiring carriers to prove that a customer is not receiving a Lifeline discount from any other provider. In Puerto Rico, the TRB has begun informing ETCs that it is their responsibility to resolve “duplicate” Lifeline accounts and to provide evidence to the TRB in particular cases that duplicate accounts do not exist or have been eliminated. This obligation that is being shifted to carriers by USAC and the TRB is not only burdensome but also is an impossible task because concerns of privacy and competitive sensitivity prevent carriers from sharing information about the customers they serve.

The current rule, together with random audits of individual subscribers by USAC in conjunction with state and territory commissions, should be an adequate safeguard against customers receiving discounts from multiple providers. The burden of seeking out evidence of multiple discounts, and taking action to eliminate any duplication, should not be placed on carriers, but rather should be the responsibility of the administering agencies.

F. Consumer Outreach.

PR Wireless submits that the Commission’s current Lifeline outreach guidelines, together with the annual ETC recertification process, are sufficient to ensure adequate outreach efforts by ETCs. The guidelines are detailed and provide ETCs with many examples of appropriate ways to make potentially qualifying populations aware of the availability of the discounts. And they are flexible enough for carriers to adopt their own programs to suit particular community needs.

Any attempt to codify specific outreach requirements would create innumerable problems as carriers attempt to apply them in areas with widely diverging cultures, economies, local governments, and demographics. PR Wireless’s own outreach efforts, including specific advertising materials and brochures for the general public, vary depending on the community of interest. Accordingly, the Commission should continue to rely on its current guidelines—and periodically

update the guidelines—to promote awareness of the programs among low-income populations. The current guidelines form a valid basis for Commission enforcement should a carrier fail to conduct appropriate outreach to its communities of interest.

III. CONCLUSION.

As consumers continue to shift to wireless telecommunications services, and as broadband continues to assume a central role in the everyday activities of Americans, the responsibilities of the Joint Board in this proceeding take on heightened importance. The Lifeline and Link Up programs must be revised so that they better ensure that low-income consumers have the opportunity to access wireless and broadband services.

PR Wireless respectfully urges the Joint Board, in framing its recommendations to the Commission, to consider the actions advocated by PR Wireless in these Comments. The actions proposed by PR Wireless are intended to serve the goal of greater accessibility for low-income consumers, without raising any concerns regarding waste, fraud, or abuse in the administration of the Lifeline and Link Up programs.

Respectfully submitted,



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