Barbara Boyd
State Representative, 9th House District

April 21, 2011

Chairman Julius Genachowski
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Federal-State Joint Board on Universal Service Lifeline and Link Up**
CC Docket No. 96-45; WC Docket 03-109; WC Docket 11-42

Dear Chairman Genachowski,

Thank you for your leadership in addressing issues affecting the Lifeline program at the March 3rd FCC meeting. During these challenging economic times, Lifeline and similar programs are extremely important to my constituents and their families in the Cleveland, Ohio area.

I applaud your efforts to both increase participation in these programs, and to eliminate any waste, fraud and abuse. Indeed, the majority of the FCC's proposed reforms were both reasonable and, I believe, ultimately beneficial to both the LifeLine program and its users. However, there were three proposed modifications to the program that I believe would have a negative impact on the users of Lifeline services.

The FCC proposed a "minimum charge," either a monthly fee or one time enrollment fee, to participate in wireless Lifeline programs. In addition, the FCC recommended the elimination of "self-certification" in the Lifeline program that would force enrollees to provide onerous proof of poverty to become eligible. Such onerous eligibility requirements and processes would prevent some of my constituents from participating.

These proposals, especially when combined, present an enormous barrier to entry to the program. This unnecessary barrier is aimed at *exactly* the type of end user these programs should be reaching and have been reaching in recent years. To both require that someone prove they are low income; and additionally require them to pay a fee to receive services their poverty qualifies them for, is unreasonable. These programs have been successful in recent years because they are both free and easily accessible to the average qualifying consumer. If the FCC's recommendations are adopted, the program and its users will be harmed.

I also have great concern about the FCC's recommendation of capping support for the low-income portion of the Lifeline program. To do so would again strike at the heart of what has made Lifeline more successful in the past three years than in the over twenty-year life of the program. Much of the rise in participation in the Lifeline program has been due to the "great

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recession" which has caused a great burden economically for many in this country and specifically Northeast Ohio.

Again I am extremely supportive of the FCC's efforts to modernize the Lifeline program. There are some thoughtful proposals that were put forward which will strengthen and streamline the program. However, on behalf of my constituents, I feel strongly that the recommended usage fees and the elimination of "self-certification" procedures will cripple an important federal program at a time when it is needed the most.

Thank you for your leadership in addressing the issues with these critical programs. I look forward to observing the ongoing rulemaking process.

Sincerely,

Representative Barbara Boyd
Ohio General Assembly

Barbara Boyd

CC:

Commissioner Michael J. Copps
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker