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September 1, 2011

Chairman Julius Genachowski  
Commissioner Michael Copps  
Commissioner Robert McDowell  
Commissioner Mignon Clyburn  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

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

Dear Chairman Genachowski and Commissioners Copps, McDowell, and Clyburn:

The Rainbow PUSH Coalition submits these comments in response to the Commission's proposed changes to the Lifeline and Link-Up American program. If implemented, these changes will deter low income Americans in desperate need of telephone service from accessing this already under-utilized program.

Rainbow PUSH has consistently supported the Commission's efforts to deter potential waste, fraud and abuse of Universal Service Fund resources. However, we are opposed to the proposed elimination of the time-tested procedure that allows poor Americans to self-certify eligibility for Lifeline and Link-Up. It is disconcerting that the Commission is considering requiring poor Americans to provide proof of poverty in the form of documentation of participation in the requisite governmental assistance programs, particularly during this period of extreme economic stress, and especially with the national database on the horizon, which will serve as an automatic mechanism for dealing with certification problems. Pushing an administrative problem onto Lifeline applicants will only impede their ability to utilize the program to obtain jobs and ensure family health and safety.

It has been our experience that income challenged Americans often have unstable housing conditions which affect their ability to maintain consistent sets of records as middle income and wealthy

Americans are able to do. Often, these records are lost or destroyed. As a result, low income Americans often do not have readily available the original documents that prove they are receiving governmental benefits. Also, most low income individuals do not have easy access to the technology that will allow them to get these documents to the phone provider. The difficulties poor people face in accessing the Internet, sending a fax, making a copy or scanning a document can only be fully understood by those working with them directly.

Presently, only 32% of those eligible for the program's services are receiving them. These proposed changes will shut out a large number of the remaining 68% of eligible low income Americans. Requiring eligible citizens to produce proof of government benefits in advance of obtaining desperately needed service is not only a violation of their privacy, but will only serve to keep tens of thousands of America's poor from obtaining Lifeline and Link-Up benefits that they desperately need in the midst of the biggest U.S. economic downturn in decades.

These hurdles will serve only to discourage those who are already discouraged. Many who would be faced with these additional bureaucratic barriers will simply abandon their efforts to reconnect to the telecommunication network and will ultimately be left unconnected and un-participating.

Additionally, we ask that you reject proposals that would eliminate or curtail access to the Link-Up America program. Eliminating or placing undue restrictions on the definitions of Link-Up will force many carriers out of the business of providing poor Americans with phone service and will cause subscribers to pay out-of-pocket, up-front fees to obtain these services.

Eliminating Link-Up and placing additional restrictions on those seeking to participate in the program is counter to what the Low Income program is designed to do. Denying Link-Up subsidies to telephone companies that predominately serve low income Americans *because* those companies focus on serving low income families is unfair, discriminatory, and contrary to the very intent of the program. These companies that actually bring Lifeline and Link-Up to those that need it the most are fundamentally different than traditional providers. Simply because these companies are different is not a valid reason to force them out of providing these vitally important services. Without these "direct action" providers who actively bring the program to communities where it is most needed, low income consumers will inevitably be forced to turn to a diminishing pool of providers and, consequently, may ultimately be faced with credit-checks, deposits, long term contracts or paying higher rates for service due to a lack of competition in the marketplace.

Neither of these two proposals will further the Commission's objective of reducing potential waste, fraud and abuse of limited Universal Service Fund resources. There has been no demonstrable proof or even superficial evidence that Lifeline recipients are *not qualified* to receive Lifeline and Link-Up benefits. With 48 million Americans receiving food stamps, is there really a serious concern that the 8 million currently receiving Lifeline benefits are not qualified?

Rainbow PUSH encourages the Commission to, instead, implement the proposed real-time, user-friendly databases, which will facilitate rather than discourage Lifeline and Link-Up participation. The Commission should focus on developing the proposed databases as quickly as possible rather than on changes that will hurt Lifeline and Link-Up access.

Landline Lifeline has been around for years, but it has only been the onset of wireless Lifeline services that has made a real impact on bettering the lives of poor Americans. We at Rainbow PUSH have observed this impact firsthand. Now is not the time to eviscerate this successful government program that is accomplishing the goals of universal service as set out by Congress. The proposed changes should not be adopted and the status quo should be preserved. The alternative is to deny access to the vital benefits of the Lifeline and Link-Up America program to thousands of Americans who are qualified to receive them.

Keep Hope Alive,

A handwritten signature in black ink that reads "Jesse L. Jackson, Sr." in a cursive style.

Reverend Jesse L. Jackson, Sr.  
President and Founder  
Rainbow PUSH Coalition

Cc:

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