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October 17, 2011

Chairman Julius Genachowski  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: WC Docket No. 10-90, WC 03-109, WC 07-135

Dear Chairman Genachowski:

As the nation's largest and oldest Latino organization, the League of United Latin American Citizens (LULAC) has been a consistent and passionate advocate for spreading high-speed Internet access to every American regardless of race, income or geography. Our network of 56 community technology centers is the largest and most advanced network of minority technology centers in the United States and serves over 150,000 people per year ([www.lulac.org/ctc](http://www.lulac.org/ctc)). The LULAC technology centers provide many Latinos with their only broadband internet connection helping them learn to use computers and the internet to improve their quality of life and increase opportunities for their families.

In addition, LULAC in partnership with NCLR created a broadband promotion PSA in English and Spanish that is reaching more households across the United States than any other broadband PSA ([www.CambiaTuFuturo.org](http://www.CambiaTuFuturo.org)). In partnership with the Broadband Opportunity Coalition, LULAC operates 10 digital connector programs giving Latino youth advanced internet and computer networking training so they could help others in their communities get online.

LULAC has also developed an online information portal providing Latino families with the content and resources that can expand and enhance educational and workplace opportunities. Finally, we are encouraging ISPs to provide entry level price points for low income Americans to access the internet such as Comcast's Internet Essentials program which was first announced at LULAC's Legislative Conference last February.

Given our efforts to move the United States towards universal broadband access and adoption, we write to convey our enthusiastic support for your plan to reform and modernize the universal service fund and the intercarrier compensation system to help to fund broadband deployment and adoption through the establishment of the Connect America Fund. This reform is long overdue and is absolutely necessary in order to close the persistence and alarming growth of the digital divide.

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As you stated in your remarks on October 6, the USF is outdated, wasteful, inefficient, and unfair, and it doesn't work in the 21st Century. We believe the High Cost Fund in particular is not targeted to the areas where the digital divide is most severe and at \$4.5 billion and growing, the High Cost Fund dwarfs every other USF program, including funds targeting low income communities such as Lifeline and Linkup where the digital divide is the greatest.

LULAC endorses your efforts to transition USF to a Connect America Fund that will ensure universal availability of wired and mobile broadband while constraining the growth of the high cost fund so that fees paid by consumers, that are as much as 15% of the average phone bill, don't continue to escalate. At the same time we encourage the FCC to rebalance the communities that the Connect America Fund subsidizes as it transitions from ensuring universal access of basic voice service to a 21st century fund focused on broadband access and adoption.

It would be unfair, in our opinion, if the Connect America Fund were to prioritize the building out of broadband access for the 5% of Americans without a broadband provider over the 32% of Americans who have not adopted broadband in their homes primarily because they simply cannot afford it. LULAC believes strongly that the FCC must place as strong a priority on helping the 75% of Spanish Speaking Latino families who still do not have active broadband connections in their homes, for example, as it does for rural families that don't have broadband access altogether. In both cases, the lost opportunities and economic damage caused by the lack of broadband are severe and need to be addressed.

It is our hope that the Connect America Fund is rebalanced to reflect the FCC's goals of universal broadband service rather than letting the old ratio of high cost to low income subsidies from the voice line era continue unchanged. In addition, we believe that expanding and revamping Lifeline and LinkUp services would provide an instant boost to adoption levels among Latinos, just 45% of whom currently have active broadband internet connections in their homes.

We also endorse your proposal to reform and modernize the intercarrier compensation system which in effect places a hidden tax on consumer's long distance rates. LULAC actually prefers the "ABC Plan" to reform the ICS because it establishes a single low cost rate for the entire country that is phased in over 5 years. We encourage the FCC to move quickly to reduce these charges to provide relief to consumers and to stop the abuses of the current system which are no longer necessary for a voice line network that has already been built out to near universal access.

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In summary, LULAC is greatly encouraged by and strongly supports the FCC's USF and ICS reform proposals and given the substantial consensus among stakeholders that these programs need urgent reform, we believe that now is the time to take action. LULAC commends the FCC and stands ready to work with the Commission to help ensure that underserved and unserved populations are not left behind.

Sincerely,

*Brent Wilkes*

Brent Wilkes  
National Executive Director

CC: Commissioner Michael Copps  
Commissioner Robert McDowell  
Commissioner Mignon Clyburn