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January 23, 2012

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Ex Parte Notice in WC Dockets 11-42, 03-109 and CC Docket  
96-45**

Dear Ms. Dortch:

On Friday, January 20, 2012, Dr. George Korn, associate professor, Ohio University School of Media Arts and Studies and advisor to Rev. Jesse Jackson; Bishop Simon Gordon, midwest regional bishop, Full Gospel Baptist Church Fellowship; Bishop Dr. James Dukes, bishop of social justice, United Pentecostal Churches of Christ International; Bishop Tavis Grant, national field director, Rainbow PUSH Coalition; and Rev. Steven Smith, director, Rainbow PUSH Coalition Telecommunications Project, met with FCC Chairman Julius Genachowski; Chief of Staff Zachary Katz; Kimberly Scardino, deputy division chief, Telecommunications Access Policy Division; and Michael Steffen, legal advisor to the chairman, regarding the above-referenced Lifeline and Link-Up proceedings.

Dr. Korn presented Chairman Genachowski and his staff with a letter from Rev. Jesse Jackson (attached) detailing the Rainbow Push Coalition's position on Lifeline and Link-Up reform and reviewed the key points in the letter.

Dr. Korn then introduced the clergy and explained that each serves a congregation as pastor as well as serving in the broader role indicated by their titles. Korn also presented the Chairman and his staff with a letter (attached) previously submitted into the Lifeline dockets signed by 59 clergy from around the country expressing their support for the Lifeline program and the need to avoid creating barriers to enrollment for low income individuals. The signees consist of both pastors of individual congregations and denominational leaders together representing hundreds of thousands of church members. He explained that the purpose of the meeting was to give the Chairman a sense of everyday life in low income communities and provide examples of

how, without a telephone, poor people become disconnected from society. Without phone service, the most basic processes and activities become difficult, limiting options and possibilities for the poor and pushing them to the fringe of society.

Dr. Korn pointed out that the latest statistics show that 40% of Americans have no discretionary income. A telephone is something that poor people do without and it's a tool that they need to maintain and improve their lives.

Bishops Gordon, Dukes and Grant proceeded to present accounts of the reality of everyday life in low income communities and the need poor people have for telephone service. The examples included the need for telephone communication in mentoring young people, providing food bank services, job placement and work scheduling, teacher/parent school issues, medical needs, emergencies, child care needs, utility shut-offs, preventing criminal recidivism, and more. It was pointed out that because of unstable housing conditions, a cell phone number often becomes the equivalent of an address. There are a number of programs and services that can only be accessed if an individual has a telephone number. A phone number is a step toward stability.

The bishops also pointed out that churches in low income communities have become answering services. Because they don't have phone service, many people give their church's number out when they need to provide a contact number. A significant amount of time is spent by church personnel answering calls for members that come in on church numbers. This is an awkward and time-consuming process. But if the church doesn't do it, many of these folks would be out of touch and isolated.

The bishops made it clear that Lifeline is an important program that meets a real need in the low income community and they urged the Chairman to maintain it and not add barriers to access.

As the attached clergy letter states: We believe in this program and have a deep and passionate desire to see it continue in its present form so it can continue to serve the most vulnerable. When poor people have their electricity cut off, heat cut off, can't pay their rent and afford their medicine, this service allows them some means of staying connected to family, friends, and yes, even their church and pastor, in hopes of finding some help in times of trouble. Lifeline and Link-Up provide a light in the midst of darkness so that the poor can have a fighting chance to see their way out.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. If you have questions regarding this letter, please contact me directly.

Sincerely,

/s/ George Korn

George Korn, Ph.D.  
Advisor to Rev. Jesse L. Jackson, Sr.



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January 20, 2012

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

Dear Chairman Genachowski:

The Rainbow PUSH Coalition and I, personally, have been active in the discussions on Lifeline and Link-Up reform, filing comments, speaking with commissioners, and following the debate. I commend you for taking on the difficult task of reforming these programs. However, as we approach a vote on the final order, I am concerned that some of the proposed rules will limit the availability of Lifeline to low income Americans.

I support the Commission's universal broadband goal and, clearly, the largest challenge to reaching that goal is finding ways to increase penetration in the low income community. It appears that, in this order, the FCC will begin taking steps to adapt Lifeline to meeting this need. As you are well aware, this will be a long process. It's a big jump from pilot programs to a significant increase in broadband penetration in the low income community.

My concern throughout these proceedings has been two-fold. First, as we begin to explore ways to close this "broadband gap", we cannot abandon our commitment to providing the poorest Americans with basic voice service. It is a necessity for survival. In your remarks on January 9, you recognized the importance of basic telephone service in today's world: "Lifeline recipients rely on their phones to do everything from finding a job to coordinating child care to calling 9-1-1 during an emergency." If we fail to address this ongoing need for basic voice service, even as we move toward universal broadband, we will relegate a vast number of citizens to the fringe of society. Low income Americans need cell phones today, as well as broadband tomorrow.

At Rainbow PUSH, we see the effects of lack of phone service on poor people everyday. Churches become answering services--if you have to provide a phone number and don't have one, you give out the church number. You struggle to communicate with employers or arrange job interviews, keep track of children, communicate with teachers, arrange child care, obtain basic services, deal with emergencies, and more. Without a phone, actions that middle class Americans take for granted can become insurmountable tasks.

We experience the problems everyday, and we have seen the joy and sense of relief when an individual receives a Lifeline cell phone. Broadband should be supported, but not at the expense of basic telephone service for America's poor.

Although there has been a lot of media attention lately on free Lifeline wireless phone offerings, there has been little discussion of the benefits such offerings bring. Lifeline provides just the type of basic service mentioned in your January 9 remarks and without it poor Americans would have no viable communication alternative. Moreover, the free cell phone program spares the very poorest from having to pay out-of-pocket costs, costs that may seem minimal to most but are simply out of reach for many Americans.

While fiscal responsibility is necessary in all government programs, I am concerned about your proposal to put Lifeline "on a budget". You offered no specifics in your talk, but "budget" sounds very much like a cap. Rainbow PUSH and many other groups have opposed capping the Low Income Fund from the beginning. You rightly recognized in your remarks that the program will expand and contract based on economic conditions. As has been pointed out numerous times in this process, even with the increase in Lifeline enrollment due to our current economic downturn, only around 1/3 of qualified households are participating in the program. A cap on the Low Income Fund or a cap targeted to the Lifeline program is incompatible with the mission Congress intended for the program. A cap will keep many poor families from enrolling in and benefitting from Lifeline.

If it is impossible for the 2/3 of qualified households not participating in Lifeline to enroll, then the program, in effect, no longer exists for them.

Second, as you address fraud, waste and abuse in the program, it is inappropriate to create barriers to enrollment that will limit the participation of qualified, low income individuals that Congress created the program to serve.

Any fraud on the part of Lifeline providers or enrollees must be addressed. Any bad actors in the program must be dealt with and eliminated. However, in terms of enrollees, I would suggest that much of what has been labeled overt fraud is the result of a lack of program clarity for applicants that results in unintended fraudulent behavior. That's why I'm encouraged to see that you're proposing "new measures to ensure that consumers are informed of program requirements." If these measures do not result in added restrictions to enrollment, they can be an important step in maintaining the integrity of the program.

The leading Lifeline providers are actively combating fraud, waste and abuse. As you are aware, providers have implemented sixty-day non-usage procedures that will eliminate the problem of subsidies for unused phones. The industry itself has proposed and agreed to fund a non-duplication database, and I'm pleased to see that you are mandating that database in your order. Once it's implemented, the problem of subscribers having more than one Lifeline phone will be minimized. Also, industry leaders have proposed and are exploring the establishment of an eligibility verification database. Such a database will simplify the enrollment process, remove the burden of documentation from the enrollee, and minimize the possibility that those who are not qualified will receive Lifeline benefits.

The database solution is the best solution for both the duplication problem and verification of program eligibility. In our filings, we have consistently argued against requiring the poor to produce "food stamp letters" or other documentation to enroll for Lifeline. Low-income Americans often have unstable housing conditions that affect their ability to maintain consistent sets of records. Often, records are lost or destroyed. As a result, low income Americans frequently do not have readily available the original documents that prove they are receiving government 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. It is typically a challenge for poor people to access the Internet, send a fax, make a copy or scan a document. Often, they must pay high fees for these services. As studies have shown, many, faced with these barriers, will abandon their efforts to enroll in the program and will be left nonparticipating and unconnected.

We have also consistently argued against requiring a monthly fee. Those who qualify for Lifeline are already facing economic hardship. In most cases, they are surviving on a meager monthly income that leaves them little room for extras, including a cell phone. Requiring a monthly fee will limit participation. Also, 9 million American households--17 million adults--are unbanked. This means that to send in a small monthly payment for phone service, say \$1.00, an individual will have to purchase a money order or use a transfer service. Either one is an expensive proposition. Poor Americans would end up paying \$5.95, \$8.95 or more to simply transfer the fee to the phone company. This would put further financial pressure on struggling households and keep many from enrolling.

Finally, while we recognize modifications to Link-Up may be necessary, we oppose its complete elimination and encourage the FCC to recognize that Link-Up is an important subsidy for those smaller carriers that are most active in reaching the low income community. Without it, many may be forced out of business, leaving large parts of the low income community un-served. Also, as we move toward universal broadband, Link-Up may well be a necessary component in reaching the low income community with broadband service. We advocate a re-envisioning of Link-Up rather than its elimination.

There are now officially over 46 million people living in poverty in the United States, an all time high. The need for poor Americans to be “connected” through telephone service is critical and, while universal broadband is a goal we must strive for, access to a cell phone today creates employment and financial opportunities that would not be there otherwise. Lifeline and Link-Up are needed now more than ever. Now is not the time to create barriers to Lifeline access or limit the ability of carriers to reach out to low income communities.

I appreciate the effort that you, your fellow commissioners, and the FCC staff have put into the reform process. As you shape the final form of the order, I hope you will carefully consider the points I have made here. Lifeline is a program that serves “the least of these” and I hope the reforms you enact allow its benefits to be experienced by more of our fellow citizens in need.

Keep Hope Alive!

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

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

November 21, 2011

Greater First Church  
4862 Olcott Avenue  
East Chicago, Indiana 46312

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

Dear Chairman Genachowski and Commissioners Copps, McDowell and Clyburn:

It is with great urgency that we write you today on behalf of the poor and indigent that we serve on a daily basis through the ministries we provide.

There are over 40 million Americans living at or below the national poverty line. The current recession, which has created an alarming rate of unemployment, makes matters even worse for this at-risk population. This crisis is affecting the "least of these". As entitlement programs are being slashed at the federal and state levels, those of us who devote much of our time to meeting the needs of those in poverty need all the assistance we can get.

Recently we became aware of a subsidized cell phone program that helps millions of poor and underserved Americans. It is the FCC's Lifeline and Link-Up America program that allows poor and low-income persons to have access to a cell phone with a limited amount of subsidized minutes each month. It is akin to a lifeline in the dark for all who the program serves.

We are concerned about proposals being considered by the FCC that would make it more difficult for people to access the program and possibly even cap Lifeline and Link-Up funding. Asking applicants to provide additional documentation in the form of food stamp letters or other documents that provide proof of poverty and requiring a monthly fee from program participants would certainly rule out participation for many.

It's a fact that low-income Americans often have unstable housing conditions which affect their ability to maintain consistent sets of records. Records are often lost or destroyed making it difficult for many to provide needed documentation. Then there's the problem of getting this documentation to the phone provider. Copying and fax fees,

limited access to scanners and even the Internet—all this makes providing documentation a problematic undertaking that will certainly keep many from enrolling. A monthly fee will be another barrier to participation in the Lifeline program. Those who qualify for Lifeline are already facing economic hardship. In most cases, they are surviving on a meager monthly income that leaves them little room for extras, including a cell phone. It has been reported that currently, during this period of economic stress, around 40% of American households have no discretionary income. Requiring a monthly fee will absolutely limit participation.

Finally, capping the fund during this period of increased economic hardship seems highly inappropriate when the need is so great.

We believe in this program and have a deep and passionate desire to see it continue in its present form so it can continue to serve the most vulnerable. When poor people have their electricity cut off, heat cut off, can't pay their rent and afford their medicine, this service allows them some means of staying connected to family, friends, and yes, even their church and pastor, in hopes of finding some help in times of trouble. Lifeline and Link-Up provide a light in the midst of darkness so that the poor can have a fighting chance to see their way out.

All that we ask is that you look at this program through the eyes of the thousands it has helped and put yourself in their shoes and ask the question: What would you do when your choices, options, and alternatives are limited by bureaucrats that don't have to live like you live, yet they make decisions that can make your life so hard or so much better?

This program is no panacea to poverty; simply put, it perhaps provides one with the means to find a way out. We, the undersigned religious leaders and those we serve, would greatly appreciate it if you would fight for the people Lifeline and Link-Up serve and save the program in its present form.

Our prayers are with you as you make decisions that will impact the lives of millions of Americans.

Serving Christ,



Bishop Tavis Lane Grant  
Greater First Church  
East Chicago, Indiana

Rev. Dr. Wendell Anthony  
President  
Detroit NAACP  
Detroit, Michigan

Bishop Victor Agee  
State Bishop of Illinois  
Full Gospel Baptist Church Fellowship  
Chicago, Illinois

Pastor Steven Bland  
Detroit Baptist Ministers  
Detroit, Michigan

Bishop Franklin Blanks  
Community Church of Christ  
International  
Atlanta, Georgia

Bishop Beulah B. Brandon, Th.D.  
New Life Fellowship  
St. Louis, Missouri

Reverend William Briscoe  
MICAH-Milwaukee Ministers'  
Conference  
Milwaukee, Wisconsin

Rev. David Bullock  
State Director  
Rainbow Push Michigan  
Detroit, Michigan

Bishop Timothy Clark  
Presiding Bishop  
Berean Fellowship  
Columbus, Ohio

Bishop Craig Cobb  
Church On The Move  
Dallas, Texas

Bishop David Cooper  
Regional Bishop  
Full Gospel Baptist Church Fellowship  
Albuquerque, New Mexico

Bishop Greg Davis  
Greg Davis Ministries/Impact TV  
Detroit, Michigan

Bishop James Dixon  
Community of Faith  
Houston, Texas

Bishop James Dukes  
Liberation Christian Center  
Chicago, Illinois

Rev. Walter Blaylock  
Rainbow Push Coalition  
Elgin, Illinois

Bishop Lawrence Brandon  
Full Gospel Baptist Church Fellowship  
Shreveport, Louisiana

Pastor Darius Brooks  
Grace Central  
Bellwood, Illinois

Pastor Willie James Campbell  
President of Evangelism  
Church of God In Christ  
Chicago, Illinois

Bishop Herbert Coats  
Redeemed International Church  
Fort Wayne, Indiana

Pastor Justin Cohen  
Full Gospel Theological College  
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Dr. Andre Cook, CEO  
Kingdom Life Churches  
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Pastor Gary Crum  
Elmwood Community Church  
Selma, Alabama

Bishop Gregory Dillard  
Pentecostal Church of Christ  
Chicago Heights, Illinois

Bishop James Douglas  
Suffragan Bishop  
United Pentecostal Churches  
Cleveland, Ohio

Bishop J. D. Ellis  
United Pentecostal Churches  
Cleveland, Ohio

Bishop Joseph Farmer  
Greg Davis Ministries/Impact TV  
Detroit, Michigan

Bishop Derrick Fitzpatrick  
Stone Temple Baptist Church  
Chicago, Illinois

Bishop George Gibson  
Christian Love Fellowship  
Philadelphia, Pennsylvania

Dr. Mildred Harris  
God First Ministries  
Chicago, Illinois

Bishop Andy C. Lewter  
Hollywood Full Gospel Church  
Long Island, New York

Bishop Terrance Livingston  
Dayton Outreach  
Dayton, Ohio

Bishop Joseph McCargo  
The International Apostolic Network  
Landover, Maryland

Pastor Robert McClure  
First Church Of God  
Gary, Indiana

Pastor DeAndre Patterson  
Destiny Worship Center  
Chicago, Illinois

Pastor Sieon Roberts  
New Hope Church  
Gary, Indiana

Bishop Tom Scott  
34<sup>th</sup> Street Church of God  
Tampa, Florida

Pastor Quincy Fielding  
Church of God  
Los Angeles, California

Bishop Andrew Ford  
Ford Memorial Temple  
Philadelphia, Pennsylvania

Bishop Simon Gordon  
Midwest Regional Bishop  
Full Gospel Baptist Church Fellowship  
Chicago, Illinois

Pastor Fred Jackson  
True Foundation Full Gospel Baptist  
Church  
Gary, Indiana

Pastor Gregory Livingston  
Mission of Faith Baptist Church  
Chicago, Illinois

Bishop Roy Marshall  
Nehemiah Community Church  
Chicago, Illinois

Bishop Bobby McCarter  
Fairview FGBC  
Jackson, Mississippi

Reverend Charles McKenzie  
State Director  
Rainbow Push Florida  
Tampa, Florida

Bishop Neal Roberson  
Gospel True Life Church  
Lansing, Michigan

Bishop Shawn Stevens  
Full Gospel Theological College  
Philadelphia, Pennsylvania

Bishop Larry Trotter  
Presiding Bishop  
New Century Churches International  
Chicago, Illinois

Pastor Walter Turner  
Chicago Baptist Ministers  
Chicago, Illinois

Dr. J.C. Wade  
Zion Baptist Church  
East Chicago, Indiana

Dr. Cynthia West, CEO  
The Apostolic Network  
Bridgeport, Connecticut

Pastor Kelly B. Williams  
Greater Destiny Church  
East Chicago, Indiana

Pastor Lester Williams  
Community Church of Christ  
International  
New Orleans, Louisiana

Pastor Chris Woods  
RAW Ministries International  
Dallas, Texas

Pastor Theodore Turner  
Plaquemines Parish Ministers'  
Conference  
New Orleans, Louisiana

Bishop Lanier Twyan  
Full Gospel Theological College  
Philadelphia, Pennsylvania

Bishop Donald Washington  
Mount Hermon Baptist Church/Come  
Alive Fellowship  
Columbus, Ohio

Pastor Bernice Williams  
First Corinthian Pentecostal Church  
Chicago, Illinois

Bishop Lester Williams  
Presiding Bishop  
Community Churches International  
Queens, New York

Bishop Orlando Wilson  
Antioch Baptist Church  
Baltimore, Maryland