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September 17, 2013

VIA ECFS

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

Re: Lifeline Awareness Week – Written *Ex Parte* Presentation; WC Docket No. 11-42

Dear Ms. Dortch:

Representatives of Blue Jay Wireless, LLC; Boomerang Wireless, LLC; Global Connection Inc. of America; i-wireless LLC and Telrite Corporation (collectively, the “Companies”), each members of the LifelineConnects Coalition (“Coalition”),¹ attended last week’s Lifeline Awareness Week event hosted by the New America Foundation on September 12, 2013. The event was co-hosted by the Leadership Conference on Civil and Human Rights, the National Hispanic Media Coalition, the National Consumer Law Center, the Media Action Grassroots Network and the United Church of Christ, OC, Inc. It featured a keynote speech by Chairwoman Clyburn, remarks by Commissioner Catherine Sandoval of the California Public Utilities Commission, Gene Kimmelman of the New America Foundation, Chanelle Hardy of the National Urban League, Olivia Wein of the National Consumer Law Center and Jessica Gonzalez of the National Hispanic Media Coalition and testimonials from Lifeline subscribers across the country, including many from Access Wireless (i-wireless), Life Wireless (Telrite), enTouch Wireless (Boomerang) and Stand-Up Wireless (Global Connection).

In addition, the Leadership Conference on Civil and Human Rights hosted “A National Call on Protecting and Expanding the Lifeline Program” featuring a keynote address from Representative Doris Matsui and statements from Commissioner Sandoval, Jessica

¹ See <http://www.lifelineconnects.org/>.

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Gonzalez, Edyael Casaperalta from the Center for Rural Strategies and Professor David Super from Georgetown Law School.

The Companies applaud Chairwoman Clyburn, Commissioner Sandoval and Representative Matsui for their leadership and thank the New America Foundation, the Leadership Conference on Civil and Human Rights, the National Hispanic Media Coalition, the National Consumer Law Center, the Media Action Grassroots Network and the United Church of Christ, OC, Inc. for highlighting the widespread support for the Lifeline program. These inspirational events serve as a clear reminder of the importance of the Lifeline program for low-income consumers.

In her keynote speech at the New America Foundation event, Chairwoman Clyburn delivered yet another impassioned speech in support of the Lifeline program. Notably, the Chairwoman defended the availability of wireless service for low-income Americans and highlighted the Commission's successful efforts to reform and protect the Lifeline program from waste, fraud and abuse. The Companies agree that it is critically important for low-income Americans to have available to them at affordable prices the communications services commonly used by all members of our society. These include mobile wireless services (which are supported by the Lifeline program) and free handset options (which are not supported by the Lifeline program but are an important means of access to Lifeline supported service).

Chairwoman Clyburn also spoke eloquently and assertively in support of moving toward Lifeline support for broadband service.² Representative Matsui, who along with Representatives Henry Waxman and Anna Eshoo introduced a bill in April to expand Lifeline support to broadband, did the same in her remarks made during the Leadership Conference on Civil and Human Rights call. The Companies emphatically agree that, like the other universal service programs, the Lifeline program must transition to supporting broadband to provide low-income consumers effective access to jobs, education and healthcare.

In her speech, Chairwoman Clyburn also highlighted the stories of several Lifeline subscribers that have been able to contact family, healthcare providers and first

² See Prepared Remarks of Acting FCC Chairwoman Mignon Clyburn, New America Foundation, Communications Safety Net: How Lifeline Connects Families and Communities, Washington, DC (Sept. 12, 2013), available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-323263A1.docx. See also Prepared Remarks of FCC Commissioner Mignon Clyburn, Consumer Federation of America, Consumer Assembly 2013: Challenges and Opportunities, Washington, DC (Mar. 15, 2013), available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-319533A1.pdf.

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responders because of their Lifeline service. The Companies believe it is important to tell those stories so that supporters and opponents of the Lifeline program understand the everyday impact that Lifeline support makes on the lives of low-income Americans. For months, the Companies have collected similar stories from their Lifeline subscribers describing how Lifeline has helped veterans, the elderly and parents connect to jobs, schools, healthcare providers and emergency services. Included as Exhibit A to this letter is a selection of these “Lifeline Faces and Stories” categorized by jobs, safety, veterans, family and seniors, some of which were featured at the New America Foundation event. In addition, included as Exhibit B is a more extensive collection of Lifeline Faces and Stories from the Companies.

While these Lifeline Faces and Stories speak for themselves, it is important to remember that the various constituencies represented often are underrepresented here in Washington. The work of public interest and civil rights organizations, such as the New America Foundation, the Leadership Conference on Civil and Human Rights, the National Hispanic Media Coalition, the National Consumer Law Center, the Media Action Grassroots Network and the United Church of Christ, OC, Inc. on behalf of low-income Americans is as remarkable as it is important. Indeed, in conjunction with Lifeline Awareness Week, 84 groups representing veterans, seniors, rural interests, consumers, civil rights, minority interests, labor and those living in poverty sent a letter to all Congressmen and Senators to underscore the important role the Lifeline program plays for low-income Americans in providing access to job opportunities, medical services, educational advancement and civic participation.³ The Companies applaud and are grateful to these groups for their efforts in support of the Lifeline program and the low-income consumers it serves.

³ The letter is included as Exhibit C.

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This letter is being filed electronically for inclusion in the public record of the above-referenced proceeding. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

*Counsel to the LifelineConnects Coalition
members Blue Jay Wireless, LLC; Boomerang
Wireless, LLC; Global Connection Inc. of
America; i-wireless LLC and Telrite
Corporation*

cc: Kim Scardino, WCB
Radhika Karmarkar, WCB
Jonathan Lechter, WCB
Garnet Hanly, WCB
Michelle Schaefer, WCB
Christopher Cook, WCB

EXHIBIT A



REAL FAMILIES
REAL STORIES
REAL LIFELINE

lifelineconnects.org

JOBS



“I was in desperate need of a phone and on the job hunt fiercely. Well my first interview I gave the receptionist my phone number and although I didn’t get the job I got another interview and they were able to call me because of my new phone thanks to StandUP.”



-Lillian W.



“Without my phone I could not make the phone calls to inquire about employment. I just received a call about an hour ago from an employer to schedule me for an interview. Without this phone that would not have been possible.”

- Edward B. (Chicago, IL)



“I got laid off from my job and have been looking for employment for the past 7 months. I need to have a phone where potential employers can contact me.”

-Tara G., Kentucky



“I used to work in a beauty shop, but I couldn’t afford the rent any longer so now I cut hair out of my apartment. My clients need a way to contact me to schedule appointments. I rely on my Lifeline phone so that they can reach me. If they call and I’m not available, they’ll go somewhere else.”

--Charlene P., Indiana



SAFETY



“My kids and I were home alone one day and a young man started banging and kicking at my door and windows. He was screaming, “Let me in now!” My kids were scared, crying and upset because he would not stop or go away. I called 911. The police arrived and chased him away. Having my Life Wireless cell phone gives me a sense of comfort and security because I know I will be able to use it to call for help if I need to in the future.”

- Amber M. (Saginaw, MI)



I am a domestic violence survivor and I am starting my life over with my two children. I currently have two jobs and pay rent and childcare expenses myself. I feel this phone will help me a lot. Thank you.



-Gekiya M.



“This phone has saved my life. I am a single mother of three and going to college. Within 48 hours of receiving this phone, I was assaulted. Had I not received this phone I would have never been in the position call 911. There was no one around at the time to help me. I am very grateful for the person at the tent who helped me get this phone. I went back to the tent a few days after my assault and thanked the agent for saving my life.”

- Maria R. (Chicago, IL)



“I am a recovering addict. Me getting this phone and Lifeline service is going to be a fresh start of a new real life. Having this new phone will be the 1st thing that I will use to start my new life. Thank you so much!”



- Jenifer T. (Oklahoma City, OK)

VETERANS



“I’m a young Army veteran and a single father. I joined the service when I was 19 as a way to provide for my family. I’ve served for 6 years including tours in South Korea, Japan, Germany and Afghanistan. I income-qualify for Lifeline service. Since returning home, I’ve settled in a remote area of Nevada. I find occasional work as a freelance mechanic, but am struggling to find full-time employment. I use my Lifeline phone on my resume when applying for jobs and as a way to keep in touch with my family members that live far away.”

-Brian S., Nevada

access **WIRELESS**



“I became homeless and am now living in a shelter My StandUP Wireless phone has helped me keep in touch with my family during a current time of personal crisis. It has helped them to know that I am in a safe place.

My StandUP phone has helped me keep doctor’s appointments at the local Veteran’s Association facility and it has helped me to have a phone to receive calls for future employment. Without the StandUP phone I’d have no way of communicating with anyone and therefore get out of this personal crisis.

Thank you for being there for me! ”

- Regina F.



FAMILY



Meet Aesha M. from Broken Arrow, Oklahoma. Aesha is a single mom of one with another child on the way. She was in need of a phone to get in contact with her doctors and family during her pregnancy. She was very thankful for our help and told me that having Lifeline service would help her out tremendously in this time of need.



“I have three young children and need to provide their schools with an emergency contact number in case they need to reach me. My Lifeline phone gives me peace of mind knowing that I can be reached if anything happens to one of them.”

-Darnique J., Ohio



“I don’t want to have to rely on this service, but for now anything that can help us save money is a lifesaver. We just moved to Cincinnati from Missouri to live with my Dad. I’m trying to find a job so that we can save some money to find a place of our own. My kids qualify for Medicaid, so I can use this phone to make their doctor’s appointments.”

--Stephanie F., Kentucky



“Thank you for connecting our residents to Life Wireless’ cell phone program. It may seem like such a simple thing to be able to place and receive calls, but when you are homeless and desperately trying to stabilize your family’s life, having access to a reliable phone service is essential. Thank you so much for partnering with us to support these women.”

- Julianna Janssen, Ascension Place (Minneapolis, MN)

FAMILY



“I am a single Mom with three kids. My ex-husband does not pay child support and I am solely responsible for taking care of our children. I clean houses and offices to make a living, but I need to know where my kids are and that they are okay when I’m working.”

-Samantha L., Ohio

access **WIRELESS.**

SENIORS



“I am 77 years old. I am so thankful for this phone and Lifeline services because it will give my family peace of mind. I have had 7 heart attacks and have seven stints. Needless to say my family is concerned about me. I am glad to have this phone because my family can now have peace of mind knowing that they can get in contact with me and that I have a way to call in case of an emergency. Lifeline service means peace of mind to my family and I.”

Edwina Neadeau



“I became a StandUp customer in February of 2013. I am delighted with the service. My two grandsons have asthma. More than once the pre-K or elementary school has called me on my StandUp phone to alert me that the asthma was acting up so I could take them home to their machine that provides breathing treatments. That would not have been possible in the year before receiving my Lifeline phone as I did not have phone service.”

-Susan B.



“I use my lifeline to make doctor appointments and to help with my 78 year old grandmother who suffers from arthritis. She fell just the other day and she was able to call me on my phone so that I could come over and help her get back up.”

- Shandia S. (Saginaw, MI)

EXHIBIT B

Lifeline Customer Testimonials



“I have three young children and need to provide their schools with an emergency contact number in case they need to reach me. My Lifeline phone gives me peace of mind knowing that I can be reached if anything happens to one of them.”

-Darnique J., Ohio



Lifeline Customer Testimonials



“I got laid off from my job and have been looking for employment for the past 7 months. I need to have a phone where potential employers can contact me.”

-Tara G., Kentucky

Lifeline Customer Testimonials



“I’m a young Army veteran and a single father. I joined the service when I was 19 as a way to provide for my family. I’ve served for 6 years including tours in South Korea, Japan, Germany and Afghanistan. I income-qualify for Lifeline service. Since returning home, I’ve settled in a remote area of Nevada. I find occasional work as a freelance mechanic, but am struggling to find full-time employment. I use my Lifeline phone on my resume when applying for jobs and as a way to keep in touch with my family members that live far away.”

-Brian S., Nevada



Lifeline Customer Testimonials



"I don't want to have to rely on this service, but for now anything that can help us save money is a lifesaver. We just moved to Cincinnati from Missouri to live with my Dad. I'm trying to find a job so that we can save some money to find a place of our own. My kids qualify for Medicaid, so I can use this phone to make their doctor's appointments."

-Stephanie F., Kentucky

Lifeline Customer Testimonials



“I used to work in a beauty shop, but I couldn’t afford the rent any longer so now I cut hair out of my apartment. My clients need a way to contact me to schedule appointments. I rely on my Lifeline phone so that they can reach me. If they call and I’m not available, they’ll go somewhere else.”

-Charlene P., Indiana



Lifeline Customer Testimonials



“I am a single Mom with three kids. My ex-husband does not pay child support and I am solely responsible for taking care of our children. I clean houses and offices to make a living, but I need to know where my kids are and that they are okay when I’m working.”

-Samantha L., Ohio

Lifeline Customer Testimonials



“I am a elderly caregiver and am trying to pursue an education while balancing a full-time job and the needs of a family. Having a Lifeline phone allows me to check in to make sure my son got off the school bus okay and made it home safely. I can also check in to make sure that my ailing Mother is doing ok.”

-Charese M., Illinois



Life Wireless

Testimonials



Medical

“I use my lifeline to make doctor appointments and to help with my 78 year old grandmother who suffers from arthritis. She fell just the other day and she was able to call me on my phone so that I could come over and help her get back up.”

- Shandia S. (Saginaw, MI)



“My husband has blood issues and I am a diabetic. Life Wireless has helped me be able to talk to the doctors and make appointments for me and my husband who has to go to the doctor several times a week.”

- Hilda R. (Gainesville, GA)

“I like Life Wireless because it helps me with my medical issues. Most of my minutes go toward calls for getting medicine and communicating with my doctor. This service helps me a lot.”

- Reginald M. (Darlington SC)

A proud member of the LifeLineConnects Coalition



Employment

“Without my phone I could not make the phone calls to inquire about employment. I just received a call about an hour ago from an employer to schedule me for an interview. Without this phone that would not have been possible.”

- Edward B. (Chicago, IL)



“This phone gives me the stability to be able to network and generate income. Life Wireless has helped me out tremendously.”

- Mark M. (Waynesville, IL)

“Thanks to your company, this program, and the employees that got me this phone, I am now employed! The apartment is coming soon. No more sleeping on friends couches or being completely homeless with no place to sleep. This phone was a life changing thing.”

- Curt D. (Kansas City, MO)

A proud member of the LifeLineConnects Coalition



Safety & Security

“My kids and I were home alone one day and a young man started banging and kicking at my door and windows. He was screaming, “Let me in now!” My kids were scared, crying and upset because he would not stop or go away. I called 911. The police arrived and chased him away. Having my Life Wireless cell phone gives me a sense of comfort and security because I know I will be able to use it to call for help if I need to in the future.”

- **Amber M. (Saginaw, MI)**



“This phone has saved my life. I am a single mother of three and going to college. Within 48 hours of receiving this phone, I was assaulted. Had I not received this phone I would have never been in the position call 911. There was no one around at the time to help me. I am very grateful for the person at the tent who helped me get this phone. I went back to the tent a few days after my assault and thanked the agent for saving my life.”

- **Maria R. (Chicago IL)**

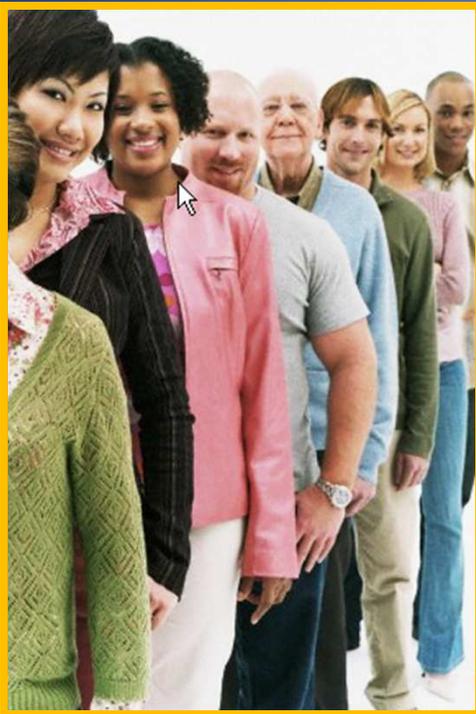
A proud member of the LifeLineConnects Coalition



Community Support

“Thank you for connecting our residents to Life Wireless' cell phone program. It may seem like such a simple thing to be able to place and receive calls, but when you are homeless and desperately trying to stabilize your family's life, having access to a reliable phone service is essential. Thank you so much for partnering with us to support these women.”

- Julianna Janssen, Ascension Place (Minneapolis, MN)



“An aspect we really appreciate about Life Wireless' business is that they are so relational, and that is what we, as a Lutheran organization, are all about: building relationships. We especially like that they show up in person and business is done face-to-face. Representatives are responsible, welcoming and always treat every customer with incredible respect. Working with Life Wireless has been very enjoyable.”

**- Sheila Kvilvang, Lutheran Social Service of Minnesota –
The Center for Changing Lives (Minneapolis)**

A proud member of the LifeLineConnects Coalition



A proud member of the Lifeline Connects Coalition
Responsibly Keeping Americans Connected.

Meet Aesha McCrary from Broken Arrow, Oklahoma. Aesha is a single mom of one with another child on the way. She was in need of a phone to get in contact with her doctors and family during her pregnancy. She was very thankful for our help and told me that having Lifeline service would help her out tremendously in this time of need.

Brandon Stapp
enTouch Team Leader
August 2013



Meet Nathan Sands. Nathan participates in the Food Stamp program.

"This phone & Lifeline service will substantially impact my life in a huge way. Now, I will be able to reach my kids' teachers at their school. If there's an emergency with my elderly parents in South Carolina, they will be able to reach me at all times and vice versa. So thanks for real enTouch!"

Shay Cooper
enTouch Team Lead
August 2013



A proud member of the Lifeline Connects Coalition
Responsibly Keeping Americans Connected.

Meet James Warner of Tulsa, Oklahoma.

“ I can get better employment than my stand-by personnel job I have now. I want better for myself.”

Dreck Cooper
enTouch Team Member
August 2013



Meet Cheryl Pace. Cheryl participates in the Food Stamp program.

“I have been trying to get a job, but have no phone to be reach at by potential employees. This phone will help me maybe get a job real soon!

Dreck Cooper
enTouch Team Member
August 2013



A proud member of the Lifeline Connects Coalition
Responsibly Keeping Americans Connected.

Meet David and his daughter Sarah. David participates in the LIHEAP program . He is from White Earth, MN.

"The Lifeline program is helping me so much with this phone & service. I can contact emergency services if I need to. Anybody that I need to get a hold of I will be able to now. It means a lot. Thank you."

Chanelle Pennick
enTouch Team Member
August 2013



Meet Ms. Denise. She was very grateful for our help in providing her with a phone & Lifeline services. She had fallen onto some hard times recently with losing her job as a teacher. Her son lives in Virginia. She said this phone will help her son keep in contact with her unlike recently. Ms. Denise thanked me several times for the good that our company is doing to help people in need.

Doug Bryller
enTouch Event Manager
August 2013



A proud member of the Lifeline Connects Coalition
Responsibly Keeping Americans Connected.

Meet Anne Ewing. She lives in Oklahoma City, OK and participates in the Food Stamp program.

"I chose to get a phone & Lifeline services through enTouch because of their reputation to connect people of limited income to the Internet by providing customers with smart phones with data and wifi capabilities."

Shay Cooper
enTouch Team Leader
August 2013



Meet Jennifer Tackitt. She lives in Oklahoma City, OK and participates in the Food Stamp program.

"I am a recovering addict. Me getting this phone and Lifeline service is going to be a fresh start of a new real life. Having this new phone will be the 1st thing that I will use to start my new life. Thank you so much!"

Shay Cooper
enTouch Team Leader
August 2013



A proud member of the Lifeline Connects Coalition
Responsibly Keeping Americans Connected.

Meet Jeremy Hawkins. Jeremy participates in the Bureau of Indian Affairs General Assistance Program.

"This phone and Lifeline services will help me stay in touch with my kids and my job."

Shay Cooper
enTouch Team Lead
August 2013



Meet Maria. She lives in Mahnoeman, MN and participates in the Food Stamp program.

"Lifeline is going to help me out alot, by saving money. I take care of my nieces and nephews right now, its really going to help a lot, I'm thankful that Entouch Wireless is doing this. Thank you."

Chenelle Pennick
enTouch Team Member
August 2013



A proud member of the Lifeline Connects Coalition
Responsibly Keeping Americans Connected.

Meet Linda Hallet from Red Lake Minnesota.

“Thanks to enTouch wireless I have one of the best birthday presents I’ve had in a very long time. I broke my leg yesterday and my family has been worried about me. Because of this phone and Lifeline services my family can call to check on me and they won’t have to spend money they don’t have to come and check on me. It’s a life saver!”

Meet Duane Feather a 52 year developmentally challenged gentlemen. He received his first ever cell phone. His sister , barely able to hold back tears said ,

“I came with my brother up here because I thought this was some sort of scam, or that it would cost him money but we’re leaving with a phone that works and I have a way of communicating with him in case of emergencies. He’s so happy and It’s such a relief to know we can call each other and that someone is actually helping us.”

Meet Edwina Neadeau.

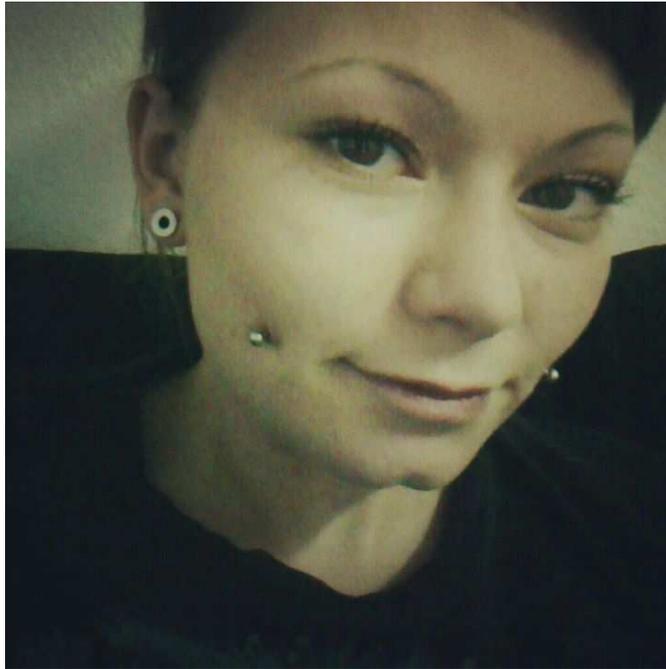
“I am 77 years old. I am so thankful for this phone and Lifeline services because it will give my family peace of mind. I have had 7 heart attacks and have seven stints. Needless to say my family is concerned about me. I am glad to have this phone because my family can now have peace of mind knowing that they can get in contact with me and that I have a way to call in case of an emergency. Lifeline service means peace of mind to my family and I.”

Meet Carla.

"I felt really good when I got the phone with Lifeline service. I've never had a phone or company that I felt comfortable with. I am a community walker and without a phone, that was not safe. I use the phone to help the community. Now I feel comfortable doing my job and protecting my community.”

enTouch Event Teams
Northern Minnesota
July 2013

Joelle J.



“I have received employment since enrolling in the program. I have also been able to be in contact with my counselor, lawyer, case manager, and many other important persons and appointments. I was unable to do that prior to receiving this service. I take the bus everyday of the week and am able to check with valley metro if the bus is late or when the bus comes after all of my appointments. It has really taken a weight off of my shoulders and I appreciate it greatly!”

Lillian W.



“I was in desperate need of a phone and on the job hunt fiercely. Well my first interview I gave the receptionist my phone number and although I didn’t get the job I got another interview and they were able to call me because of my new phone thanks to StandUP.”



How **StandUP** Helped Gekiya M. To Succeed!

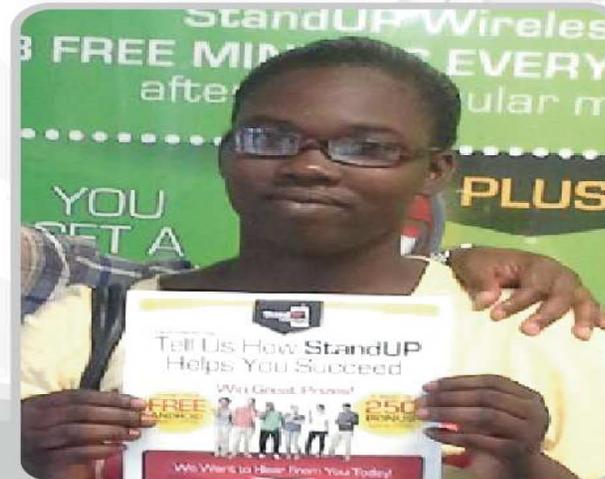


I am a domestic violence survivor and I am starting my life over with my two children. I currently have two jobs and pay rent and childcare expenses myself. I feel this phone will help me a lot. Thank you.





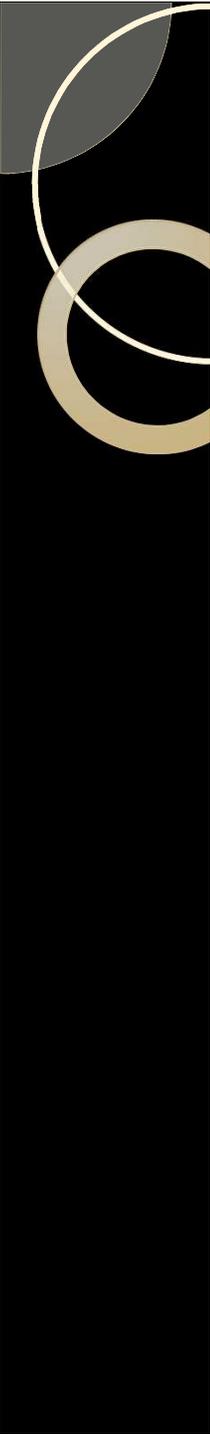
How **StandUP** Helped Veronica J. To Succeed!



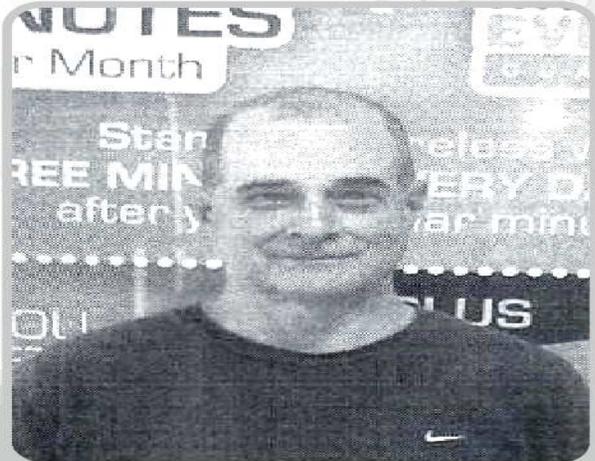
"I am out of work, and cannot afford wireless service at this time. Mainly because I am taking care of my niece and two nephews for my incarcerated sister. StandUP's Lifeline service actually helps to keep me afloat! Since I got my phone with the free minutes I can effectively do an employment search! I now can put my number on applications and my resume which will help me to get the job I need so that I and my niece and nephews can live a better life."

Veronica J. Winters





How **StandUP** Helped Steven C. To Succeed!

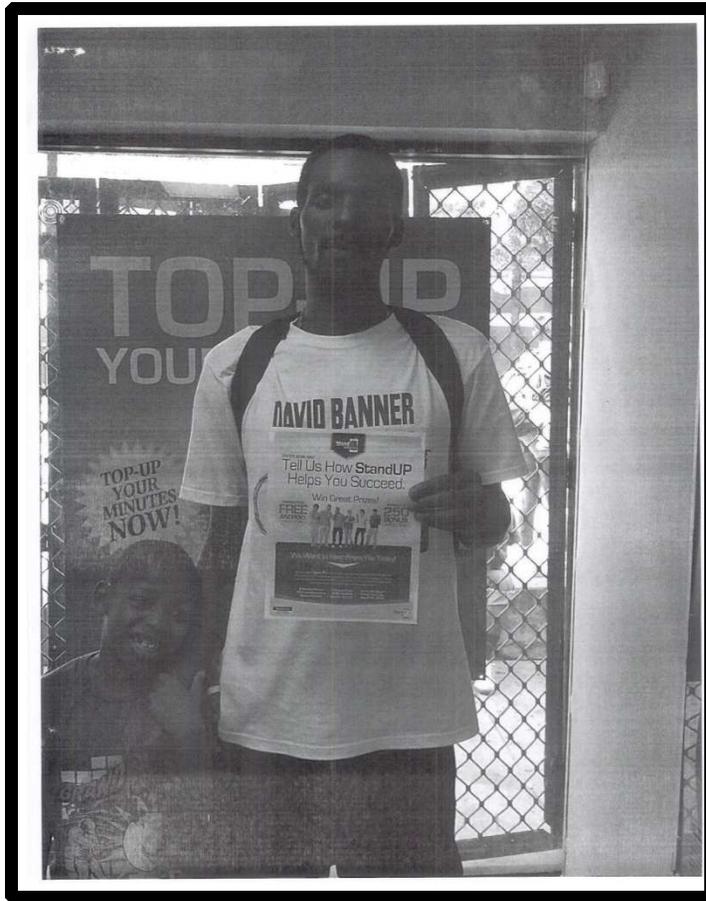


I use my phone for emergency purposes to contact family and relatives. And customer service is excellent at StandUP.

Trademark Wireless



Benjamin O.



“StandUP Wireless has helped me abundantly. With my free minutes I was able to communicate with family and also friends. I was also able to obtain gainful employment and schedule appointments. This service is very helpful and I would recommend it to my friends and family.”

Regina F.



"I became homeless and am now living in a shelter My StandUP Wireless phone has helped me keep in touch with my family during a current time of personal crisis. It has helped them to know that I am in a safe place.

My StandUP phone has helped me keep doctor's appointments at the local Veteran's Association facility and it has helped me to have a phone to receive calls for future employment. Without the StandUP phone I'd have no way of communicating with anyone and therefore get out of this personal crisis. Thank you for being there for me! "



Susan B.



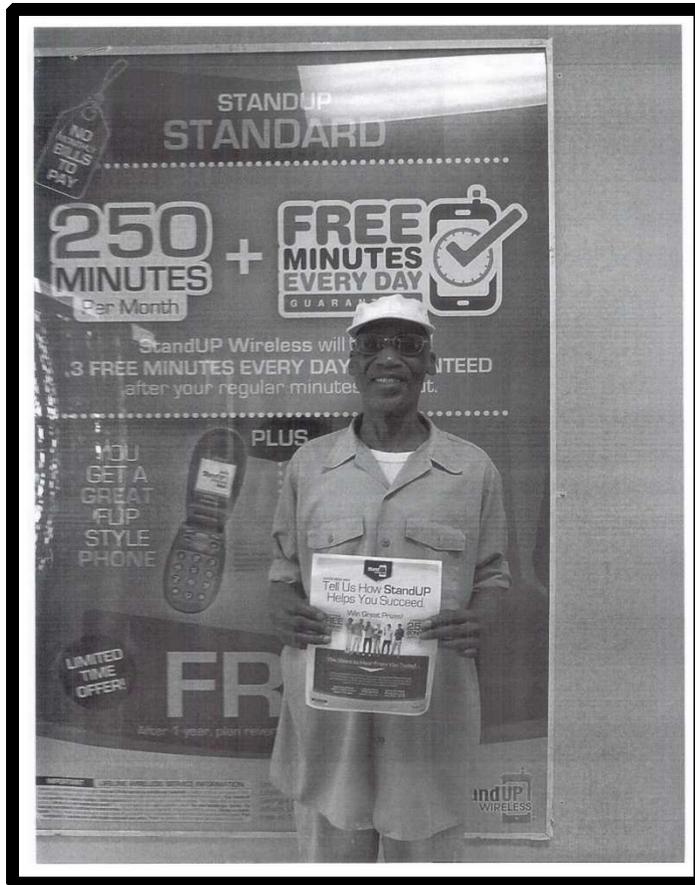
“I became a StandUp customer in February of 2013. I am delighted with the service. My two grandsons have asthma. More than once the pre-K or elementary school has called me on my StandUp phone to alert me that the asthma was acting up so I could take them home to their machine that provides breathing treatments. That would not have been possible in the year before receiving my Lifeline phone as I did not have phone service.”

Laurell H.



“Well, StandUp Wireless has helped me out a lot. I enrolled into school at AIU taking up Criminal Justice and my StandUp phone helped me complete the process. I have also been able to keep up with my children’s doctor, dentist, etc appointments.”

Raymond R.



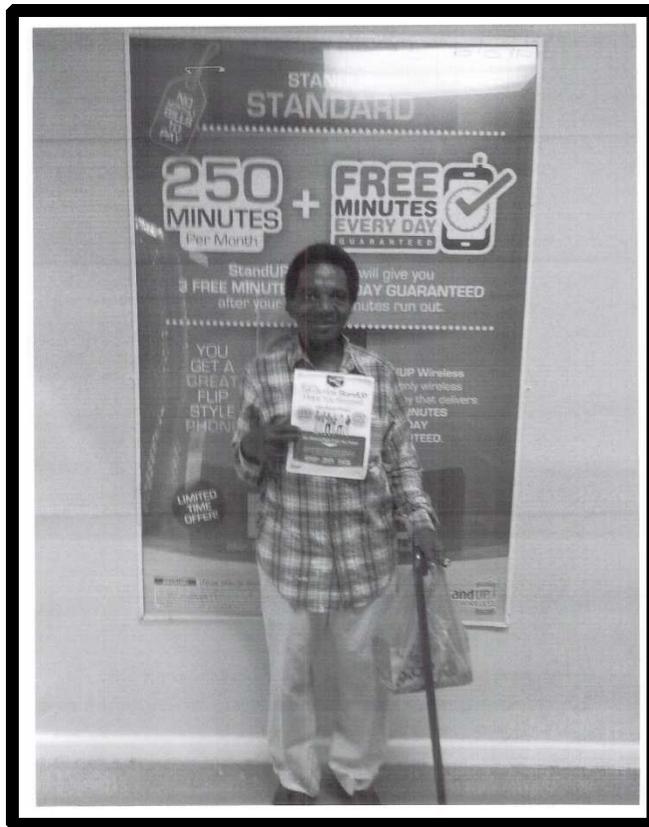
“My story is that StandUP Wireless has helped me to keep in touch with my list of contacts, including my mother and has helped me to keep needed appointments and doctor’s visits, so I am very much thankful for StandUP Wireless and the representatives have been very helpful..”

Rueben K.



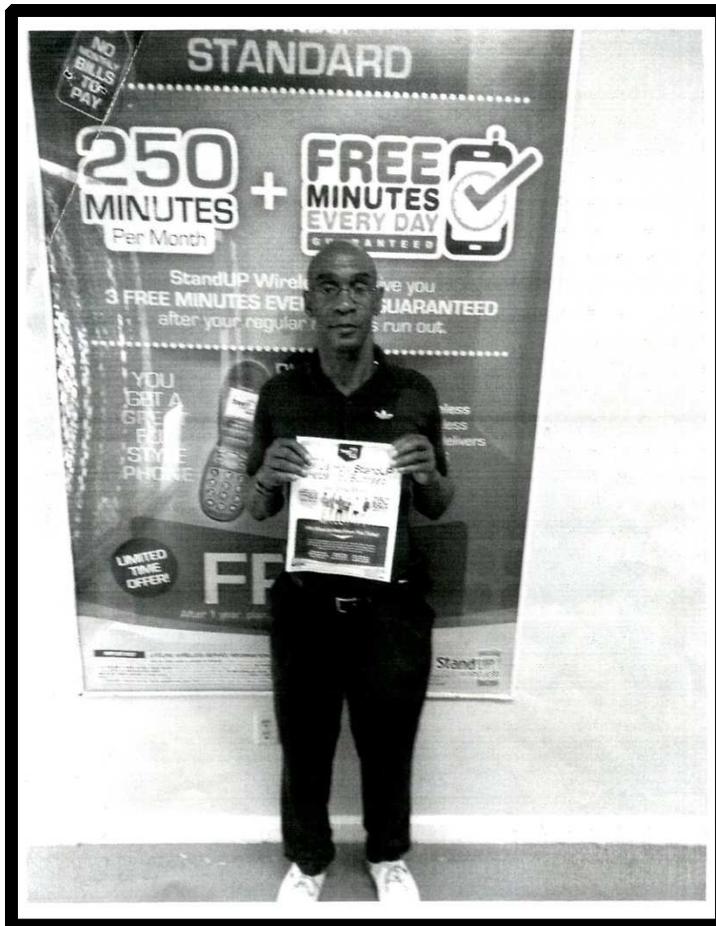
“After being released from prison I struggled finding a job, reporting to parole, and attending substance abuse classes. I was in desperate need of a phone to keep in contact with these obligations. StandUP solved my problems by providing me with the phone and it has helped me fulfill my obligations and finish my parole. August first, I’m done with everything and will have successfully discharged my sentence. Thank you StandUP for providing an excellent service.”

Harold M.



“StandUP Wireless has been a tremendous help in my everyday life. It has assisted and benefitted me in making important contacts and keeping in touch with my family, loved ones and friends. It changed my life for the better. I could not afford one. Thank you StandUP.”

Tony S.



“This phone helped me get a job. Because of this phone now I got my first check. Thank you for the phone and for StandUP Wireless.”



EXHIBIT C

September 12, 2013

The Honorable John D. Rockefeller IV
Chairman
Committee on Commerce, Science and Transportation
United States Senate
Washington, D.C. 20510

The Honorable John Thune
Ranking Member
Committee on Commerce, Science and Transportation
United States Senate
Washington, D.C. 20510

Dear Chairman Rockefeller and Ranking Member Thune:

We represent a diverse coalition of public interest, civil rights, religious, and community-based organizations — from across the country — working on issues related to the media, telecommunications, technology, and social justice. We write to underscore the significance to our communities of the Lifeline Program, which provides a modest subsidy to low-income consumers to pay for basic telephone service. We urge you to support this vital program.

Our nation's communications policy is based on the fundamental principle of universal service for good reason: people need affordable communications services to connect to the outside world for job opportunities, medical services, educational advancement, and civic participation. The Lifeline Program is an essential component of our nation's Universal Service program, complementing the other Universal Service programs that support service for rural and hard-to-reach areas, as well as schools and libraries.

Thanks to Lifeline, some members of our most vulnerable and disadvantaged populations are able to maintain telephone service when their incomes would not otherwise cover this necessity. Ensuring access to affordable communications services is not a partisan issue. The program was initiated during Ronald Reagan's administration and later expanded under the George W. Bush administration to cover wireless service in the aftermath of Hurricane Katrina.

Recent media attention has focused almost exclusively on perceptions of abuse and fraud in the Lifeline Program. These sensational stories gain traction because they exacerbate and exploit stereotypes about the individuals who use the program. But these allegations of abuse and fraud are exceptions, and it's important to keep in mind the many deserving subscribers and communities currently relying on this vital resource, which disproportionately includes seniors, people with disabilities, veterans, rural residents, Native Americans, communities of color, and struggling families. Lifeline users depend on the program to access economic opportunities and emergency services — and to escape the circumstances that made them eligible for the program in the first place.

Critics' proposals to limit the program's coverage or eliminate the program entirely are ill-conceived. The reforms adopted by the Federal Communications Commission in 2012, and the additional guidance offered more recently, must be given time to be fully implemented so that

their efficacy can be accurately assessed. These reforms, which include clear mandates for carriers to identify the phone service as a Lifeline service, uniform procedures to confirm eligibility of program participants, and automated mechanisms to avoid duplications have already begun to address the identified abuses and will make the program more efficient.

As public interest, civil rights, faith-based, and community advocates, we, too, have an interest in seeing the efficient and effective use of the money collected from consumers for the Universal Service Fund. We believe the solution is to continue to enforce the rules of the reformed program to eliminate fraud and penalize those who abuse the program, including especially companies that fail to comply with the stricter Lifeline rules. While improving the program, however, we must continue to serve the individuals who need Lifeline most.

Thank you for your consideration.

Respectfully,

Access Humboldt
AdvoCare, Inc.
AFL-CIO
American Civil Liberties Union
Appalshop, Inc.
Art is Change
Asian Americans Advancing Justice | AAJC
AVANCE National
Benton Foundation¹
Center for Accessible Technology
Center for Media Justice (CMJ)
Center for Rural Strategies
Coalition on Human Needs
Common Cause
Community Media Workshop
Consumer Action
Consumer Federation of America
Consumers Union
Cuban American National Council, Inc. (CNC)
Disciples Justice Action Network
Ecumenical Poverty Initiative (Disciples Center for Public Witness)
Edgemont Neighborhood Coalition of Dayton Ohio
Esperanza Peace and Justice Center
Free Press Action Fund
Global Action Project
The Greenlining Institute
Highlander Research and Education Center
Hispanic Association of Colleges and Universities (HACU)

¹ The Benton Foundation is a nonprofit organization dedicated to promoting communication in the public interest. These comments reflect the institutional view of the Foundation and, unless obvious from the text, are not intended to reflect the views of individual Foundation officers, directors, or advisors.

Hispanic Federation
Homeless Action Center
Institute for Local Self-Reliance
Instituto de Educacion Popular del Sur de California
Iraq Veterans Against the War
KFAI Radio
The Leadership Conference on Civil and Human Rights
Line Break Media
LULAC, League of United Latin American Citizens
Main Street Project
MANA, A National Latina Organization
Martinez Street Women's Center
Media Action Grassroots Network (MAG-Net)
Media Alliance
Media Literacy Project
Media Mobilizing Project
Mexican American Legal Defense and Education Fund (MALDEF)
Missouri Association for Social Welfare (MASW)
NAACP
National Alliance of Latin American & Caribbean Communities (NALACC)
National Association of American Veterans, Inc.
National Association of Hispanic Federal Executives (NAHFE)
National Consumer Law Center, on behalf of its low-income clients
National Council of La Raza (NCLR)
National Hispanic Council on Aging
National Hispanic Media Coalition (NHMC)
National Hispanic Medical Association (NHMA)
National Latina Institute for Reproductive Health
National Puerto Rican Coalition (NPRC)
National Urban League
Native Public Media
NJ SHARES, Inc.
Ohio Poverty Law Center (OPLC)
Open Access Connections
Open Technology Institute
Pennsylvania Utility Law Project
Pro Seniors, Inc.
Prosperity Works
Public Knowledge
Public Utility Law Project of New York, Inc.
Saint Paul Neighborhood Network
SER – Jobs for Progress National, Inc.
Springwire
Southern California Tribal Digital Village
Southwest Voter Registration Education Project (SVREP)
Southwest Workers Union
TURN – The Utility Reform Network
United Church of Christ Justice and Witness Ministries

United Church of Christ, OC Inc.

United Methodist Church, General Board of Church and Society

United States Hispanic Leadership Institute (USHLI)

Urbana-Champaign Independent Media Center

Virginia Citizens Consumer Council

Virginia Rural Health Association

William C. Velasquez Institute

Young People's Project