

**Before the
Federal Communications Commission
Washington D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
Connect America Fund)	WC Docket No. 10-90
)	

**COMMENTS OF MEMBERS OF THE RURAL BROADBAND POLICY GROUP:
ACCESS SONOMA BROADBAND, APPALSHOP, BROADBAND ALLIANCE OF
MENDOCINO COUNTY, CALIFORNIA CENTER FOR RURAL POLICY, CENTER
FOR RURAL STRATEGIES, CENTRAL APPALACHIA REGIONAL NETWORK, THE
INTELLIGENT COMMUNITY INSTITUTE – MISSISSIPPI STATE UNIVERSITY
EXTENSION, THE STAY PROJECT (STAY TOGETHER APPALACHIAN YOUTH),
TERZETTO CREATIVE LLC, AND VIRGINIA RURAL HEALTH ASSOCIATION**

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September 30, 2015

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I. INTRODUCTION

Access Sonoma Broadband, Appalshop, Broadband Alliance of Mendocino County, California Center for Rural Policy, Center for Rural Strategies, Central Appalachia Regional Network, Intelligent Community Institute – MSU, STAY Project, Terzetto Creative LLC, and Virginia Rural Health Association, collectively representative of the membership of Rural Broadband Policy Group (RBPG), urge the Commission to modernize the Lifeline program. More than 200 advocates attended the (September) 2015 Gathering of the National Rural Assembly in Washington DC to address issues critical to rural America. Among those were discussions of broadband deployment and telecommunications infrastructure. This included support for the expansion of Lifeline to include broadband/high speed internet access and expanded funding for the program. Internet access is critical to finding a job, being successful in school, applying for social services, and obtaining quality health care. The Commission has rightly recognized that action needs to be taken to ensure all Americans are given essential tools to effectively engage in society, which is a step forward to closing the digital divide. RBPG supports a fair, reliable modernized program that meets the needs of qualifying low-income Americans. As the Commission moves forward and takes the necessary actions to minimize the gap between the haves and the have nots, the RBPG urges the Commission to adopt rules that speak to the realities of the 21st century and expand the Lifeline program.

II. MINIMUM SERVICE STANDARDS FOR VOICE SHOULD BE REVAMPED TO REFLECT FLUCTUATING MARKETS

The Rural Broadband Policy Group echoes the comments of the National Hispanic Media Coalition (NHMC), Public Knowledge, and the National Congress of American Indians (NCAI) in urging a change from the current minimum standard levels of 250 voice minutes. That voice service level does not reflect the realities of the market or people's lives. Low-income Americans rely on voice service to engage with doctors, employers, schools, and social services. The RBPG agrees with the specific recommendations of NHMC to "set evolving minimum standards for voice minutes based on the common usage patterns. (The standard) should also provide sufficient minutes for the average consumer to maintain voice service through the course of a month without needed to "top off" by purchasing costly additional minutes."¹ Since the average American uses 690 minutes of voice service per month², the ideal voice service should address the needs of low-income Americans by exceeding that level. The RBPG's recommended voice service standard of 1000 minutes per month meets those needs.

The Rural Broadband Policy Group agrees with Public Knowledge that the Commission should continue to support fixed and mobile services as the Lifeline program is modernized to broadband services³. Vulnerable populations depend on voice service to contact health providers, emergency services, and loved ones.

¹ See Comments of the National Hispanic Media Coalition, *Lifeline*, WC Docket No. 11-42 et al, (August 31, 2015).

² See Rural Broadband Policy Group, et al, comments, *Lifeline*, WC Docket No. 11-42 et al, (August 31, 2015).

³ See Public Knowledge, et al, comments, *Lifeline*, WC Docket No. 11-42 et al. (September 1, 2015).

III. THE FCC SHOULD WORK TOGETHER WITH TRIBAL NATIONS ON ELIGIBILITY METRICS

As the Commission moves forward on modernizing the Lifeline, and adopting the best eligibility metrics for low-income communities, it is important to remember each state is different⁴ and each jurisdiction has different needs. This applies to Tribal Nations as well. 63% of persons living in Tribal land do not have access to high-speed broadband⁵. The comments of the National Congress of American Indians (NCAI), “the oldest and largest representative organization of American Indian and Alaska Native tribal governments”⁶, are of particular interest.

The RBPG strongly supports NCAI’s comments, “the Commission should work with tribal governments, telecommunications providers, and social service departments to develop and determine methods for certifying residents of tribal lands. Tribal GIS Departments, or the equivalent, should also be consulted to obtain accurate information on physical addresses of Lifeline subscribers residing on tribal lands.”⁷

a. The FCC Should Increase Enhanced Lifeline Support On Tribal Lands

In addition to the FCC working with tribal organizations to find the right metrics, the RBPG agrees with NCAI that the minimum service standard of \$34.25 should be increased to address the economic realities of Lifeline subscribers in Indian Country. Moreover, the RBPG disagrees with Commissioner Pai’s proposal to limit the enhanced tribal subsidy to only sparsely

⁴ See Comments of the National Association of Regulatory Utility Commissioners, *Lifeline*, WC Docket No. 11-42 et al, (August 31, 2015).

⁵ Federal Communications Commission (2015). *Tenth Broadband Progress Report*.

⁶ See Comments of National Congress of American Indians, *Lifeline*, WC Docket No. 11-42; WC Docket No. 09-197; WC Docket No. 10-90.

⁷ *Id.* at page 4.

populated tribal lands.⁸ In response to Commissioner Pai’s dissenting remarks, NCAI comments state “The notion that the enhanced tribal Lifeline subsidy should be limited only to county level tribal lands with less than 15 people per square mile is blatantly absurd and severely misguided.”⁹ Essentially, this proposal highly undermines the mission of Universal Service Fund programs.

IV. CONCLUSION

With support of the Lifeline program, millions of people have received access to vital telephone services. Low-income Americans face economic hardships and Lifeline offers opportunities to make a better life. It is a success story, one that merits increased support and greater reach. The Rural Broadband Group, and as many stakeholders have commented in support, urges the Commission to modernize Lifeline to meet the needs of our nation.

Respectfully submitted,

/s/

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⁸ See Federal Communications Commission. “Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order: WC Docket No. 11-42; WC Docket No. 09-197; WC Docket No. 10-90”. ¶159. Pg 56. Released June 22, 2015. Available at https://apps.fcc.gov/edocs_public/attachmatch/FCC-15-71A1.pdf.

⁹ See Comments of National Congress of American Indians, *Lifeline*, WC Docket No. 11-42 et al, (August 31, 2015).