



March 16, 2015

PROTECT AND MODERNIZE THE LIFELINE PROGRAM

Dear Chairman Thune and Ranking Member Nelson:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 200 national organizations to promote and protect the rights of all persons in the United States, we urge you to defend the Lifeline program against threats to eliminate it. We also urge you to support the expansion of Lifeline to broadband. The Lifeline program allows our nation's most vulnerable and chronically underserved communities to maintain telephone service that would otherwise be unaffordable. While critics have focused on alleged fraud and abuse as a reason to eliminate or limit the program, we believe the best approach, as the Committee prepares for its upcoming oversight hearing of the Federal Communications Commission (FCC), is to allow the FCC's strict reforms to continue to address identified abuses, while at the same time assisting the FCC with its plans to update this program for the 21st century.

Lifeline is a successful program, enabling 12 million of our most vulnerable populations to call 911, contact prospective and current employers, and connect with essential health, social, and educational services. Moreover, telephone access for low-income people can save money for other federal programs, replacing more expensive in-person office visit and simultaneously rooting out fraud in those programs. Because a small household benefit is used in the private marketplace, this program both helps the less fortunate and strengthens competition and jobs.

Although sensationalized and opportunistic attacks on the program have gained traction because they exacerbate and exploit stereotypes about the individuals who use the program, the reality is that the FCC's reforms have successfully addressed fraud and abuse in a comprehensive manner:

- The National Lifeline Accountability Database has eliminated approximately 1.28 million duplicates, which will save the fund approximately \$161 million on an annualized basis.
- The FCC's enforcement actions have proposed more than \$90 million in fines against companies for violating rules. FCC consent decrees have recovered \$600,000 in payments to the U.S. Treasury; and more than \$400,000 in repayments to the Universal Service Fund (USF). The FCC has issued citations to more than 300 Lifeline customers with duplicative subscriptions.
- FCC Chairman Wheeler developed a USF strike force to stop fraud and abuse. However, the FY2015 appropriation does not permit full deployment of that effort.

Though successful, Lifeline remains trapped in outdated technology. The FCC recognizes this limitation and is currently developing proposals to improve and modernize the program. We urge you to collaborate with the FCC Chairman and sitting Commissioners as they

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develop their ideas. For example, Commissioner Rosenworcel has correctly noted that Lifeline expansion is the logical complement to recent E-rate reforms, enabling us to fully address the “homework gap.” Commissioner Clyburn’s reform principles are consistent with longstanding proposals from the civil rights community:

1. Adopt minimum standards to get the most for every universal service dollar.
2. Protect privacy and make the program more efficient by limiting the role of providers in eligibility verification.
3. Encourage broader provider participation in Lifeline, including possibly expanding participation to community institutions and others.
4. Leverage efficiencies by permitting eligible customers to enroll in Lifeline when they qualify for other benefits programs.
5. Leverage public-private partnerships for outreach and training.

As broadband rapidly replaces voice service as the basic communications tool for our era, the FCC should rapidly update Lifeline to match the times. Broadband non-adoption still hovers at approximately 30 percent of the U.S. population, and is even lower for seniors, Latinos, African-Americans, and recent immigrants. Increasing broadband adoption will improve the economic well-being of those populations as well as the economic competitiveness of our country as a whole.

We urge you to support the modernization of this critical program and to reject the most recent spate of unsubstantiated and outdated attacks. Please contact Leadership Conference Media/Telecommunications Co-Chair Cheryl Leanza, UCC O.C., Inc., at 202-841-6033 or Corrine Yu, Leadership Conference Managing Policy Director, at 202-466-5670, if you would like to discuss the above issues.

Sincerely,

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