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November 12, 2015

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

Re: *Ex Parte* disclosure pursuant to 47 C.F.R. § 1.1206(b) in WC Docket Nos. 11-42, 09-197, 10-90

Dear Ms. Dortch:

On November 10, 2015, the following individuals, representing public interest organizations working on modernizing the Lifeline program -- in person: Olivia Wein, National Consumer Law Center, Ariel Fox Johnson, Common Sense Kids Action, Cheryl Leanza, United Church of Christ, OC Inc., Mike Scurato, National Hispanic Media Coalition, Andy Lomeli, National Hispanic Media Coalition, Dana Floberg, Free Press, Phillip Berenbroick, Public Knowledge, Dallas Harris, Public Knowledge and via Phone: Amina Fazlullah, Benton, Danielle King, Center for Rural Strategies, Ana Montes, The Utility Reform Network, Steven Renderos, Center for Media Justice, Loris Taylor, Native Public Media met with Jay Schwarz, WCB/TAPD; Chas Eberle, WCB/TAPD; Trent Harkrader, WCB; Gigi Sohn, OCH; Matt DelNero, WCB; Eric Feigenbaum, OMR (via phone); Garnet Hanly, WCB; Ryan Palmer, WCB; Jodie Griffin, WCB/TAPD; Nathan Eagon, WCB/TAPD, and Christian Hoefly, WCB/TAPD.

In our meeting the public interest groups expressed strong support for the Lifeline program and the need to move quickly to modernize Lifeline to include broadband. Access to affordable modern-day communication services is essential for economic opportunity as well as accommodating basic needs such as health and safety. The "Faces of Lifeline" stories gathered by TURN and CMJ were shared with FCC staff (attached). Lifeline is the universal service program that focuses on universal access for low-income households. Groups raised strong concerns that, given the modest participation rate for Lifeline, imposition of a budget could result

in significant harm to struggling households. A budget should not result in eligible households being denied Lifeline. This occurs if a budget functions as a cap that results in the rationing of Lifeline benefits. Groups pointed out that there is a cost to implementation of waiting lists in terms of administration as well as health and safety of eligible Lifeline recipients. Reducing the benefit for all to avoid waiting lists is also disruptive and can have the practical effect of denial of Lifeline if providers seek to recoup the cost from Lifeline beneficiaries or if providers stop participating in the program because of unpredictable reimbursement amounts.

Groups also discussed support for the transfer of eligibility determinations to a national eligibility verifier and emphasized that the burden should not fall upon the Lifeline recipients to keep track of a physical card or PIN to access their Lifeline benefit because there are technological ways to design the benefit administration to accomplish the same result. Groups advocated for an orderly roll out of a national eligibility verifier, similar to the roll out in the states with the implementation of the duplicates database (NLAD) to minimize disruption for Lifeline participants. The filing from the Center on Budget and Policy Priorities was raised as an example of how to prioritize roll out of the eligibility verification (noting that SNAP, Medicaid and SSI cover a significant number of Lifeline-eligible households). Groups discussed the importance of a competitive Lifeline marketplace that includes non-traditional Lifeline service providers. Groups also discussed the importance of ensuring quality Lifeline service options, consideration of tiering the Lifeline benefit to provide incentives for more robust services, and focusing on functionality when looking at minimum standards. Groups emphasized the importance of standalone voice Lifeline, wireline and wireless, as an option for Lifeline consumers. Finally, groups discussed the importance of robust and thoughtful outreach and the critical role community organizations can play in preparing current and potential Lifeline participants for the new Lifeline program.

Sincerely,

A handwritten signature in cursive script that reads "Olivia Wein". The signature is written in black ink and is positioned above a horizontal line.

Olivia Wein
Lead Telecom Project Attorney
National Consumer Law Center
1001 Connecticut Avenue, NW, Suite 510
Washington, DC 20036
202-452-6252
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cc: Jay Schwarz, WCB/TAPD; Chas Eberle, WCB/TAPD; Trent Harkrader, WCB; Gigi Sohn, OCH; Matt DelNero, WCB; Eric Feigenbaum, OMR (via phone); Garnet Hanly, WCB; Ryan Palmer, WCB; Jodie Griffin, WCB/TAPD; Nathan Eagon, WCB/TAPD, and Christian Hoefly, WCB/TAPD.

The Faces of Lifeline

*The Utility Reform Network • Ana Montes • 785 Market Street, San Francisco, CA
(415) 516-1375 • www.turn.org*



Sheila Gallardo - Social Worker
Fresno, California

My mother is 90 years old. She is a mentally sharp 90 years old but is physically disabled, she doesn't have her right hip do to degenerative arthritis. She needs help walking from her bed to her chair to the bathroom. I help her walk from point A to point B and with her personal needs. I check in on her 3 to 4 times a day; I live next door. She lives with my brother who works all day. Whenever I move her from point A to point B the first thing she looks for and takes with her is her LifeLine phone. Her phone is with her at all times. When I leave she tells me not to worry that she will call me if she needs me. She feels confident and safe because she has her phone with her, if she also had broad band I would

get her on it to pay her bills and to connect with her grandchildren who live in other parts of the country this would improve her quality of life.

Gina Juarez – *Fresno, California, 2015*

“My husband just recently went back to work after being on disability for a heart condition, so due to being on a fixed income we're having a rough time paying all of our bills. One by one basic things were getting turned off like our cable and internet a service, home phone service, our trash service, we could no longer afford our car or renters insurance, our electricity and water were almost shut off and we even got behind on our rent, it was really scary.

Lifeline Telephone service was so helpful, it was one less thing we had to worry about and phone service is such a necessity. When his disability stopped and he began looking for work he needed a reliable contact number and because of the Life be program he had one. A low- income broadband program would be just as helpful and is much needed. When he was looking for work we would spend hours out of the house looking for someplace that we could find a good strong Wi-Fi connection because the application process for most companies is online. We needed to download, upload, and e-mail. My daughter has graduated from college and now she has to do the same thing as my husband to find work. Without a reliable affordable phone service, and a broadband connection to communicate with the rest of the world I don't know how long he would have been looking for employment, how much more we would've gone in debt or even if we would've had a home anymore. We are now once again able to support our children and ourselves. We're happy again, not afraid of what tomorrow will hold. My husbands health continues to improve, I have my best friend back and my kids have their Daddy back. Life is good!”



Maria Tosca and Sergio - Mother and son – *San Francisco Tenderloin, CA*

The most important things about the internet is looking for work, information that helps the kids with their homework....I use Google when I do not understand the homework, when I need translations, I look for help on the internet. It also helps my son do his exercises at home because he has a rare condition that requires him to be very active with his body and this is were we use the internet the most. If he just sits around, it is bad for his health.

We have stopped paying for other things in order to pay for our Internet. Right now we don't have it because it is very expensive. I have gotten another job and am sacrificing by working at night. I have it off and on.

**Comments From China Town
Community Development
Corporation Residents – San
Francisco Chinatown**

From Left to right: Tina Cheung,
Zhang Rui Nie, Tung Pun Tam,
Hui Lie, Shao Ao Situ, Yan Liang,
Guang Huang, Hao Feng, Min
Liang, Yan Liang, Ana Montes
(TURN), Jasmine Kavezade
(TURN)



Xiao

- 2/3 of the people interviewed **use Internet in some way**
- 7 out of 10 have some sort of Internet access (smart phone or Broadband)
- 7 out of 10 people are enrolled in the Lifeline Program

Q & A

Q: *For people who don't have Internet at home why not? For people who don't use the Internet can you share with us why not?*

Mr. Situ: Because the cost to access the Internet is too expensive.

Mr. Tam: I don't really know how to use the Internet and the cost is too much.

Q: **How or why do you use the Internet?**

Ms. Su: Because my grandkids use it and I'd like to talk to them.

Mr. Situ: One of the most important things is that I able to access medical information and medical records and I can talk to my doctors, a lot more easily if I am able to access the internet.

Q: **Where do you access the Internet if you don't have it home?**

Mr. Situ: The only time I use the Internet is at City College where I take classes at City College for ESL. City College has Internet in their library.

Mr. X: But only students can use it, you have to pay for it.

Mr. Tam: I am aware of the computers at the libraries near city hall and in Chinatown I just don't know how to use it.

Ms. Liu: One issue is when I used the computer in the library to help my daughter enroll in classes for the summer, the library only allows one hour of access. It is not very user friendly, time is limited and you can't really do what you need to do.

Tuesday, Wednesday, Thursday, the Chinatown library is open till nine. The rest of the days the library is only open till 6. I get off of work at six so I can't go most days.

Julie: Part of the problem is that there is too many people trying to access the Internet at the libraries...

Mr. Ting: We really can't get away without using the Internet because our kids need to access it to turn in assignments over the Internet. If there were a reduced or free Internet program it would be less of a burden on our finances.

Ms. Ling: I don't have internet at home and the problem for my kid to use the library to access the internet there is first you have to book in advanced when you want to use the internet there, second by the time they get off of school and get to the library they are closing. It would be great if my kid could access the Internet at home, I already paying \$70 or more in cell phone fees and I really can't afford Internet too.

Mr. Chung: The school district outreaches to the community in Chinatown to sign up for subsidized Comcast Internet that cost \$9.99. The problem is that the buildings aren't wired in here. My understanding is that the buildings are too old and they don't have consent for installations. Part of the problem is that there is an assumption from a school district level that you have Internet at home and that the kids get assignments where they need to use the Internet and then in response to the lack of internet at home the response to parents is to sign up for Comcast.... if there was an alternative to that that would be really helpful for us.



Rudy Gallardo, Writer - Retired Teacher, Activist, Grandfather - Fresno, California
Lifeline Customer

We are helping our son raise his boys. Our son has a job that is barely helping him raise his sons. Mid semester he was told that their school was running out of money and the kids needed Internet access. We got them computers and we pay for the Internet access. I also have two granddaughters and they need to come to my home to access the Internet for schoolwork or for job hunting. They have some type of smart phones but they can't do homework on it and it's really hard to use it for research.

Plus the service is not always on (it gets turned off when family can not afford the bill). Plus they can only use it for accessing the Internet when they have access to Free WI-FI, which is not that easy to find in our neighborhood.

But when you look at the San Joaquin community, there are a lot of parents that don't have a lot of resources and face the same problems. As a teacher I saw that a lot of students did not have the resources at home and that put them behind.

There are a lot of cutbacks in education and having both Internet access and LifeLine phone dual system would really benefit the living standards of the poor in the valley and add to the process of civic engagement as well. People would be able to access information and be informed.

A lifeline program that would make BB available is a necessary resource! It is important for the very low-income people in the San Joaquin Valley to find a better way of living for themselves

and their children. Everyone knows the cost is too high. A Lifeline Broadband program would help to enhance the lives of people that are struggling with their families needs.

Q: What would it would enable people to do what they cannot do now.

It would help with educational needs, ability for kids and parents to do research, fill out forms or applications, find jobs (lots of jobs have to be applied on line now), find important information, its getting harder and harder to do things in person because more things are automated.

Sam Duke- Senior and Disability Action Network, Volunteer, San Francisco, CA

Q: What are the most important things that you use the Internet for?

A: I use the Internet to keep in touch with the world that you don't get necessarily from news programs, email with family and friends, and of course trying to use the email access to let some of the political figures know that I think this is better than that as far as any actions they are taking in office.

Q: How important is it to have access to the Internet?

A: It has allowed me to be active in ways that were not dreamed of when I started political activities as a child. You can keep up with the entire world now with the internet, if you have access too it unfortunately to many people don't have access in their homes.

Q: How does or would not having Internet access impact your quality of Life?

A: I would be ignorant of many things in the world I care about because the newspapers do the not always carry the entire news about what's going on in the world.

Q: In order to stay connected what sacrifices have you made?

A: I don't have access in my home because of the cost so I have to go into an agency where I have to hook into their access, which means taking the bus to go to these agencies or a ramp cab. Time wise I loose two to three hours a day just to get the Internet.

Q: What would you like to see in a LifeLine broadband program?

A: I would say that everybody in the United states and the world that wants to be connected to what's going on the world should be able to have access to broadband and I think a program similar to the LifeLine for telephones should be a national program so that people without much money can still access from their homes the ability to use the internet from home on a daily basis so that they're in the loop all the time.



Dian Blusammers- Youth advisor board member
San Francisco, CA

What are the most important things that you use the Internet for?

Community building is number one. Also, information! I wouldn't have found Larkin youth services if the Internet didn't exist. I found Larkin St. Youth Services through the SF Forte website and without it I

wouldn't be here.



How important is it to have access to the Internet?

Finding youth services on the Internet helped my life. I use to live in a very abusive home...through the Internet I found a community of people like me, non-binary trans people of color. So that was my power outlet because I had no one in the house to support me emotionally at all. People would just degrade me.

In order to stay connected what sacrifices have you made?

I would go to café's a lot and I would order the cheapest thing like a bottle of water just so I can stay and use the Internet. It is just emotionally exhausting and draining to like pack my laptop go to the café sit down and unpack it and be there for there for however long I'm going to be there. That process is tedious.

What would you like to see in a LifeLine broadband program?

Honestly, just completely free because I think Internet is a basic human right that everyone should have access to and that everyone should have that.



Taylor Muer- Youth Advisor Board member
San Francisco, CA

What are the most important things that you use the Internet for?

Everything really! From jobs to housing to school, social media, email and getting in contact with family email. Resources and finding things that you need on the daily basis.

How important is it to have access to the Internet?

It helped me find housing and services that I needed...therapy and housing applications. Case managers would just give me just a list of housing and really I needed the applications so I had to go online anyways and get it myself.

In order to stay connected what sacrifices have you made?

Going to library and café's and traveling. Especially when I didn't have a computer then I had to either ask someone if I could use theirs and if they were busy or using it I couldn't so then I had to go the library. And you know we have a lot of libraries in the city but as far as the hours I need it's not possible to go to the library. If I am working how am I suppose to go to the library? After work its not going to be open.

What would you like to see in a LifeLine broadband program?

I feel like it's a health need. ...mind, body, and spirit. It's something that we should all have it, it shouldn't be limited to who can afford it. The Internet that I have now is subsidized but at the same time the quality of it is not good. Why should I have to pay \$40.00 a month, which I can't even afford that and I have to sacrifice more. It's just not right; we are not in a country where if you work hard you can make it. That is a myth.



Alex Howard – Youth advisor board member at Larkin St. Youth Services, San Francisco, CA

What are the most important things that you use the Internet for?

I think the most important things I use the Internet for is keeping in touch with my friends and family who live across the country. And also, research, housing, and job opportunities. That's how I found both my housing and my job...was through the Internet.

How important is it to have access to the Internet?

In terms of improving my quality of life, I don't think I could have graduated from college without access to the Internet. I think to be a successful person in today's society you have to have access to the Internet and really just to survive.

In order to stay connected what sacrifices have you made?

For me, I do have internet at home, I have a laptop, I have Comcast - but in San Francisco a whole paycheck for the month doesn't cover my rent and my utilities and my internet, which is crazy! So I have just had to sacrifice a lot of day-to-day things that I want to do as a young person in my 20s. I haven't been able to do what I've always wanted to do in the city.



What would you like to see in a LifeLine broadband program?

Taylor brings up a good point. A lot of times for something to be affordable or free its low quality. I think that's really unfortunate, that we practice in society... I think my vision for the LifeLine internet would be free and high quality and service people can access in their homes, without having to pay money at cafes to use the Wi-Fi and things like that.

Javier Boscerno- Central City Single Residence Only - intern/student from UC Santa Cruz

What are the most important things that you use the Internet for?

As a student, even in high school things have changed - especially with books. A lot of them are outdated so it's hard for libraries to be updated and keep up with the most current information. Going on the Internet you can search for books a lot easier. EBooks are a big thing and you go directly to the information you want. Also, when looking for jobs its easier to email and communicate through the Internet rather than handing in resumes to every place.

How important is it to have access to the Internet?

I have family right now and friends too who are trying to sign up for medical things like Obama care, and yeah sometimes you can call but if it's back logged in the calls it's really hard to find a place to go to in person so it's easiest to do it online, so that's helped my family a lot. My mom's a teacher, she's an elementary school teacher and they have already recognized how things have changed. So they got a grant for Google chrome books to be in the schools it's made my moms job easier, it's made it less stressful for everybody as a result so things like that ...

How does or would not having Internet access impact your quality of Life?

It would make things a lot tougher for trying to move up, its really something that makes it easier to adjust to the way things are rapidly changing with education, trying to find housing even in Santa Cruz for college you just need the internet for almost everything nowadays. If I didn't have the Internet then I wouldn't be able to keep in touch with a lot of family members that are out of town, shooting them an email or face booking them for really intimate stuff. It would be a challenge.

What would you like to see in a LifeLine broadband program?

Like I said, society is a little different than before, where phones were a big thing everyone needed in order to stay connected to people. Now the Internet is kind of becoming that. I would like it to be free for everyone but I understand if it should be subsidized. it's everywhere, even in every advertisement every company you see they are like 'follow us on twitter' they're even acknowledging how pervasive the Internet use has been. People need to access it and it's our responsibility to make it accessible to everyone otherwise the Internet will just become another way to shut out people.

In order to stay connected what sacrifices have you made?

When I was younger we would have to go to the library, our local library for the Internet. We bought a modem a while back and there are certain things you need to tighten your belt about around the house but it's worth it cause it's such a necessity.



***Gail C. Grave - Central City Single Residence Only
Collaborative Resident and Tenant Organizer***

***What are the most important things that you use
the Internet for?***

Number one is family and friends, keeping in contact with them. Secondly, Information about everything. In my line of work, I need to find out different things. Also

for doctor's appointments, something I don't understand, all kinds of things like that, and keeping updated with the news.

In order to stay connected what sacrifices have you made?

Well I have a laptop, so I have to go over to this coffee shop or that one or this one, and I have to buy an ice tea or something so I have to run all over and spend money.

What would you like to see in a LifeLine broadband program?

To be able to be connected to the Internet at a low price.