

March 2, 2016

Chairman Thomas Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Lifeline Reform and Modernization, WC Dockets 11-42, 09-197, 10-90

Dear Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai and O'Rielly:

The undersigned organizations¹ are writing to emphasize the importance of broadband access for veterans and to thus support the FCC's proposed modernization of the Lifeline program and inclusion of veterans program in the Lifeline eligibility criteria.² A modernized Lifeline program that provides a subsidy to help low-income veterans to obtain broadband Internet at home would be extremely valuable.

In the same way that access to the Internet and voice service is a necessity, not a luxury, for many people in the U.S., so too for veterans. Broadband has become integrated into modern access to educational opportunities, the delivery of healthcare, access to employment and government services as well as access to modern banking and e-commerce. The costs of digital exclusion grow as broadband becomes more integrated with modern life. Recent studies point to cost as a main barrier to broadband adoption for so many in our society.³

Veterans face poverty and homelessness. According to a 2015 report by the Department of Veterans Affairs, approximately 6.9 percent of veterans are below the poverty level, and that number has been increasing.⁴ The poverty rate for disabled veterans is higher than for disabled non-veterans for both age groups, and the poverty rate for veterans with disabilities over 65 years old is 48 percent. In January 2015, the U.S. Department of Housing and Urban Development counted 47,725 homeless veterans on a single night.⁵

Affordability of broadband is particularly critical for rural veterans. Almost of quarter of all Veterans live in rural America, where long distances pose a major barrier to access to healthcare and there are fewer health care providers per capita than in non-rural parts of the country.⁶ Over 40% of rural Veterans earn an annual income of less than \$26,000 and an estimated 43% of rural Veterans do not have broadband service at home. Affordable broadband for low-income Veterans could increase access to digital health records, telehealth care for specific medical conditions and telemental health care.

Because of the special needs of veterans, the Veterans Pension program⁷ would be an ideal program for inclusion as an eligibility program for Lifeline as it a program targeted to low-income veterans.⁸ There were around 44,000 new recipients of the veterans pension in FY 2014 with over 38% who served in World War II, around 25% served in the Korean Conflict, 32% served in the Vietnam Era and 4.3 served in the Gulf War Era.⁹ Over 64% of the new Veterans

Pension participants are age 75 and older, almost 17% are between age 65 through 74 and over 18% are between ages 35 through 64.¹⁰

The Commission also seeks comment on ways to increase awareness of Lifeline to low-income veterans.¹¹ The incorporation of the Veteran's Pension program into the suite of Lifeline qualifying programs integrates Lifeline into the Veterans Affairs programs. This creates a natural hook for outreach and education on Lifeline through the other Veterans Administrations programs that serve low-income Veterans. Year-round access to affordable voice or broadband service will complement and facilitate the other VA programs designed to meet an array of needs for low-income Veterans.

For example, the Department of Veterans Affairs' Veterans Health Administration provides health care to almost 6 million Veterans. Broadband service to the home could enhance access to health care for low-income Veterans, especially in rural America, where distance poses a barrier to access to health care services. Broadband could aid in providing health care for veterans who otherwise face arduous travel barriers to service (e.g., due to remoteness or severe injuries such as traumatic brain or spinal cord injuries). The Veterans Health Administration provides video telemedicine services to clinics around the nation via TeleMental Health, TeleRehabilitation, and additional Video Telehealth services such as TeleCardiology and TeleOccupational Therapy. Lifeline could help increase access to telehealth applications available to the home to help Veterans manage chronic conditions like diabetes and chronic obstructive pulmonary disease (e.g., check vital signs and medications). Access to affordable communications services can also make some treatments for depression, and post-traumatic stress disorder ready available for Veterans 24/7. For this reason, the FCC should also consider Veterans Health Care (Priority Groups 1-6)¹² as a Lifeline eligibility program.

The FCC's existing Lifeline criteria¹³ should be maintained as eligibility for some of those programs also play a role in providing services to homeless and low-income veterans. For example, the U.S. Department of Housing and Urban Development-U.S. Department of Veterans Affairs Supportive Housing (HUD-VASH) Program is the only federal program designed to end chronic homelessness for veterans and their families.¹⁴ The veterans who enroll in the program achieve independent living by way of veteran-specific HUD Section 8 housing vouchers,¹⁵ which are linked to comprehensive VA case management and counseling services.

We respectfully urge the Commission to act expeditiously to modernize the Lifeline program to include broadband service and to include the Veterans Pension program and consider participation in Veterans Health Care (Priority Groups 1-6) as Lifeline eligibility criteria.

Sincerely,

Center for Media Justice
Color of Change
Community Solutions
Iraq and Afghanistan Veterans of America
National Alliance to End Homelessness
National Coalition for Homeless Veterans

National Consumer Law Center, on behalf
of its low-income clients
National League of Cities
Swords to Plowshares
United Church of Christ, OC Inc.
Veterans Education Success
Volunteers of America, Inc.

¹ The organizations supporting this letter are as follows: The *Center for Media Justice* is a national racial justice hub for communication rights and representation. CMJ organizes and train to build a racial justice majority to win media justice and digital rights for all. *ColorOfChange.org* exists to strengthen Black America's political voice. Its goal is to empower our members - Black Americans and allies - to make government more responsive to the concerns of Black Americans and to bring about positive political and social change for everyone. *Community Solutions* works toward a future without homelessness, in which poverty never follows families beyond a single generation. *Community Solutions* is working intensely with 75 communities that have committed to ending veteran homelessness by end of 2016. *Iraq and Afghanistan Veterans of America* is the leading post-9/11 veteran empowerment organization, serving as the voice of 2.8 million veterans of Iraq and Afghanistan, raising awareness in the media, on Capitol Hill and among the general public. The *National Alliance to End Homelessness* works with a network of over 10,000 partners including providers and public agencies. By improving policy, building capacity, and educating opinion leaders, the Alliance has become a leading voice committed to preventing and ending homelessness in the United States. *National Coalition for Homeless Veterans* represents hundreds of community agencies across the country that are actively ending homelessness for thousands of veterans and their families each year, its mission is to end homelessness among veterans by shaping public policy, promoting collaboration, and building the capacity of service providers. The *National Consumer Law Center* is a nonprofit corporation founded in 1969 and is dedicated to protecting access to affordable, essential utility service for low-income households. The *National League of Cities* (NLC) is dedicated to helping city leaders build better communities. NLC is a resource and advocate for 19,000 cities, towns and villages, representing more than 218 million Americans. Learn more at www.nlc.org. Founded in 1974 by veterans, *Swords to Plowshares* is a community-based not-for-profit organization that provides counseling and case management, employment and training, housing, and legal assistance to approximately 3,000 veterans in the San Francisco Bay Area each year. *United Church of Christ, OC Inc.* is the media justice ministry of the United Church of Christ, established in 1959 as part of the civil rights movement, OC Inc. works to replace the media we have with the media we need to create a just society. *Veterans Education Success* is a nonprofit organization focused on preserving the integrity and promise of veterans' educational benefits. *Volunteers of America, Inc.* is one of the largest non-profit direct-service providers in the United States, with roughly 16,000 employees and 55,000 volunteers. Each year VOA's nationwide network of affiliates reaches an estimated 2 million people in over 400 communities, including approximately 45,000 veterans and their family members.

² *Second Further Notice of Proposed Rulemaking*, In the Matter of Lifeline Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund, WC Dockets 11-42, 09-197, 10-90 (Rel. June 22, 2015) ("NPRM") at ¶115.

³ See, e.g., John B. Horrigan & Maeve Duggan, *Home Broadband 2015*, Pew Research Center (Dec. 21, 2015).

⁴ National Center for Veterans Analysis and Statistics, *Veteran Poverty Trends* (May 2015), available at: http://www.va.gov/vetdata/docs/SpecialReports/Veteran_Poverty_Trends.pdf See also U.S. Census FactFinder, Table B21007, Age by Veteran Status by Poverty Status in the Past 12 Months by Disability Status, available at: http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_1YR_B21007&prodType=table

⁵ U.S. Housing and Urban Development, *The 2015 Annual Homeless Assessment Report (AHAR)* to Congress, available at <https://www.hudexchange.info/resources/documents/2015-AHAR-Part-1.pdf>.

⁶ U.S. Department of Veterans Affairs, Office of Rural Health Annual Report, *Thrive 2015* available at http://www.ruralhealth.va.gov/docs/ORH_Annual_Report_2015_FINAL, at 4,7.

⁷ Described at <http://www.benefits.va.gov/pension/vetpen.asp>; 38 C.F.R. §3.1 *et seq.*, and NPRM at ¶115.

⁸ Eligibility for the veterans' pension program requires a period of active duty service and the applicant must be age 65 or older, or totally and permanently disabled, or a patient in a nursing home receiving skilled nursing care, or receiving social security disability insurance, or receiving supplemental security income.

⁹ See US Veterans Benefits Administration's, Annual Benefits Report FY 2014, Pension and Fiduciary Program page 11 of 24 available at <http://www.benefits.va.gov/REPORTS/abr/ABR-Pension-FY14-10202015.pdf>

¹⁰ *Id.* at page 18 of 24.

¹¹ NPRM at ¶115.

¹² See, Sidath Viranga Panangala, Congressional Research Service, *Health Care for Veterans: Answers to Frequently Asked Questions* (April 30, 2015) at pp. 1-7 and Appendix. *VA Priority Groups and Their Eligibility Criteria*. (The Veterans Health Administration classifies Veterans into eight (8) priority groups with the first six groups consist of veterans with service-connected disabilities or with incomes below an established means test

("high priority" veterans) the last two groups consist of veterans with nonservice-connected medical conditions and with income above the means test threshold.)

¹³ Participation in Medicaid, SNAP, SSI, Federal Public Housing Assistance (Section 8); the Low Income Home Energy Assistance Program; National School Lunch Program (free lunch program); TANF or demonstration of income below 135% of the Federal Poverty Guidelines and additionally for those on Tribal lands, BIA's general assistance, Tribally administered TANF; Head Start (income qualifying) or the Food Distribution Program on Indian Reservations; 47 C.F.R. § 54.409.

¹⁴ See 42 U.S.C. § 1437f(o)(19); see also

http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/hcv/vash, and Libby Perl, *Veterans and Homelessness*, Congressional Research Service (Nov.6, 2015) at pp. 26-31.

¹⁵ If the HUD-VASH vouchers are not yet included in the Lifeline eligibility criteria, these should be added.