Telecommunications

Hot Topics

• Group letter to the FCC: Emergency Request for Increased Lifeline Support During the COVID-19 Crisis, March, 23, 2020
• Letter to Senate leadership: Request for Low Income Home Energy Assistance Program (LIHEAP) in COVID-19 Response Bill, Mar. 21, 2020
• Low-income consumer advocate comments to the FCC re: October 2019 Notice of Proposed Rule Making on Lifeline and Affordable Broadband, Jan. 27, 2020
• Op-ed by National Consumer Law Center attorney Olivia Wein in Governing Magazine “How Governments Can Keep Disaster Survivors Connected with Affordable Telecommunications,” November 2, 2018
• Press Release: Advocacy Groups Urge FCC to Step Back From Radical Proposals that Will Jeopardize Affordable Voice and Internet for Millions of Low-Income Veterans, Families with Children, and Older Adults, Feb. 21, 2018
• Low-income consumer comments to the FCC re: Notice of Proposed Rulemaking on Lifeline and Bridging the Digital Divide, Feb. 21, 2018

Low-income households are at risk of losing access to affordable telecommunications services in a rapidly changing and increasingly deregulated marketplace. NCLC advocates for continued strong consumer protections, low-income discount programs, and equal access to broadband and wireless services.

For additional information on consumer issues related to the Telephone Consumer Protection Act, please visit our Robocalls & Telemarketing issues page.

Policy Analysis

Telecommunications Policy Briefs, Reports & Press Releases

• Issue brief: Digital Divide: Millions of Americans Have Limited or No Meaningful Access to the Internet, August 2019
• Press Statement: Nearly 50 Organizations Oppose FCC Proposed Cap on Universal Service Fund, June 11, 2019
• Issue Brief: How Victims of Crime and Domestic Violence Survivors in Massachusetts Can Receive Discounted Voice and Data Service through the Federal Lifeline Program, May 2019
• Press Statement of National Consumer Law Center Attorney Olivia Wein Regarding FCC Proposal to Cap Critical Universal Service Fund Programs, Mar. 28, 2019
• Fact Sheet: Keeping Americans Connected During and After a Natural Disaster, September 11, 2018
• Fact Sheet: Keeping Puerto Ricans Connected After a Natural Disaster, September 11, 2018
• Press release: Advocates, Tribal Groups Seek to Delay Drastic Changes to Program Providing Affordable Voice and Broadband Access in Indian Country, July 3, 2018
• Press Statement of National Consumer Law Center attorney Olivia Wein Regarding Commissioner Clyburn Stepping Down from the FCC, April 17, 2018
• Issue Brief: How the Lifeline Program Can Help Vulnerable Consumers Connect to Voice and Internet Service after a Natural Disaster, March 2018
• Press Release: Advocacy Groups Urge FCC to Step Back From Radical Proposals that Will Jeopardize Affordable Voice and Internet for Millions of Low-Income Veterans, Families with

Press statement: Racial Justice, Civil Liberties and Digital Rights Groups Urge FCC Not to Harm Lifeline Program, May 19, 2017


Press statement re: FCC Set to Open Floodgates for Robocalls to Cell Phones, Jan. 26, 2015

Press statement re: rural rate floor, April 25, 2014

Press Statement re: the Broadband Adoption Act of 2013, April 23, 2013

Issue Brief on MA H.4216 Bill that Would Strip Existing Consumer Protections from Telephone Landline Customers and Prohibit State from Implementing Future Protections for Wireless Consumers, July 6, 2012


Telecommunications Comments and Testimony

Low-income consumer advocate comments to the FCC re: October 2019 Notice of Proposed Rule Making on Lifeline and Affordable Broadband, Jan. 27, 2020

Low-income consumer comments to the FCC re: Notice of Proposed Rulemaking on Lifeline and Bridging the Digital Divide, Feb. 21, 2018

Re: Comment on Request for Reconsideration Concerning Lifeline Broadband Providers, Mar. 16, 2017


Joint Comments to the FCC Regarding the Shift from Copper Lines, Oct. 28, 2015


Comments to the FCC in response to the Commission’s request for comments on the Petition for a Declaratory Ruling and/or Clarification brought by Citizens Bank, March 16, 2015

Group comments to the FTC regarding critical consumer protections needed as phone companies move from copper to advanced communications networks (internet protocol or IP Transition), Feb. 5, 2015


Group comments to the FCC re: opposing the American Bankers Association exemption to the Telecommunications Consumer Protection Act to allow robocalls to cell phones, Dec. 19, 2014
• **Group comments to the FCC re: preserving the Telecommunications Consumer Protection Act (TCPA) protections for cell phones**, Nov. 17, 2014.


• **Group petition to the FCC to deny Comcast-Time Warner Cable merger**, Aug. 25, 2014

• **Comments to the FCC opposing change to the Telephone Communications Protection Act to allow marketing robo-calls to cell phones**, Aug. 8, 2014

• **Group Comments to the Federal Communications Commission re: Protecting and Promoting the Open Internet Framework for Broadband Internet Service**, July 18, 2014

• **Group comments to the FCC opposing a 46% increase in the rural basic voice service rate**, April 15, 2014

• **Comments to the FCC re: AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition**, Mar. 31, 2014

• **Comments in response to the FCC’s request for comments on the Petition for Expedited Declaratory Ruling and/or Expedited Rulemaking filed by the Professional Association for Customer Engagement (PACE), December 18, 2013**

• **Group comments to the FCC re: Lifeline and Link-Up Reform and Modernization in support to accommodate domestic violence survivors**, Dec. 5, 2013

• **Group comments to the FCC re: the proposed modernization of the E-rate for high-capacity broadband for underserved communities**, Sept. 16, 2013

• **Group comments to the FTC re: Mobile Cramming Charges**, June 7, 2013

• **Answer to the FCC in support to deny Nexus’ Application for Review to treat Form 555 Reports as confidential**, June 6, 2013

• **Comments to the Massachusetts Dept.of Telecommunications and Cable re: D.T.C. 13-4 Lifeline Investigation (Lifeline Reform Order)**, April 29, 2013

• **Group comments to the Federal Communications Commission re: issues related to the Lifeline program**, April 2, 2012.

• **NCLC and Group Comments** and **Reply Comments** to the FCC Opposing Verizon/SpectrumCo/Cox Deal Petition to Consolidate. Feb. 21, 2012 (Comments) and Mar. 26, 2012 (Reply Comments).

• **Testimony** before the Massachusetts Department of Telecommunications and Cable opposing Verizon’s request to be excused from providing subpar service to landline phone service customers. Mar. 2, 2012

• **Comments and reply comments** to the FCC re: cramming from Consumers Union, Consumer Federation of America, Center for Media Justice, National Consumer Law Center on behalf of its low-income clients, and Public Knowledge. Oct. 24, 2011 (Comments) and Dec. 5, 2011 (Reply Comments)

• **Testimony** Opposing HR 3035, the Mobile Informational Call Act of 2011 by the National Association of Consumer Advocates and National Consumer Law Center Nov. 4, 2011

• **Comments and Reply Comments** to the Commonwealth of Massachusetts Department of Telecommunications and Cable on the Need to Expand Telecommunications Billing and Termination Protections to Wireless and Other Voice Service Customers. August 22, 2011 (Comments), September 16, 2011 (Reply Comments)

• **Response to the FCC on further inquiry into four issues in universal service Lifeline reform and modernization** Group CommentsLetter of Support to add WIC participants to Lifeline August 26, 2011


• **NCLC and Consumer Groups’ comments to the Federal-State Joint Board on Lifeline**, July 15, 2010
NCLC/GBLS comments to the FCC on Lifeline re TracFone’s request for clarification of the “one-per-household” rule as applied to group housing, November 20, 2009

Initial Comments on the Federal-State Joint Board Recommended Decision (Comprehensive Reform Of The USF High Cost Program) by the National Consumer Law Center, on Behalf Of Texas Legal Services Center And Edgemont Neighborhood Coalition, Represented by Advocates For Basic Legal Equality, April 2008

NCLC and TLSC Comments to the FCC on Lifeline to Refresh the Record, August 2007

Reply Comments of the National Consumer Law Center regarding the billing and termination practices of telecommunications carriers, July 10, 2006

Initial Comments of the National Consumer Law Center regarding the billing and termination practices of telecommunications carriers, June 8, 2006

Comments of NCLC and AARP on the California Public Utility Commission Staff Report on Public Policy Programs, April, 2006

Comments: of NCLC on Proposal of Verizon to Impose a Late Charge on Residential Customers, DTE 06-26, March 29, 2006

Comments: regarding FCC Consumer Protections in the Broadband Era, January 17, 2006

Telecommunications Letters

- Group letter urging Congress to address civil rights and privacy, April 19, 2019
- Group letter to the FCC in support of the Joint Petition for Stay on the Fourth Report and Order (Tribal Lifeline Order) Pending Judicial Review, July 3, 2018
- Coalition letter to the Senate supporting the Lifeline program, Sept. 13, 2017
- Group letter to the FCC supporting the 2016 Lifeline modernization order for the digital age, Feb. 23, 2017
- Coalition Letter to FCC Commissioner Clyburn Supporting the Solutions 2020 Call to Action Plan, Jan. 11, 2017
- Group letter to FCC in support of a motion to stay the 30-day non usage rule, Nov. 16, 2016
- Group letter to FCC re Realizing the Promise of the Open Internet, Oct. 17, 2016
- Letter from NCLC and 38 other advocacy organizations urging the FCC to oppose opt-in customer consent for broadband & other telecom. providers and to prohibit forced arbitration clauses in contracts, Sept. 7, 2016
- H.R. 2666, No Rate Regulation of Broadband Internet Access Act (Kinzinger) Advocates opposition letter, April 12, 2016
- H.R. 4884 (Scott) Civil rights, union, and consumer groups’ letter opposing this bill that would cap the federal low-income Lifeline program, April 12, 2016
- Group letter that the FCC expand the Lifeline eligibility criteria to include low-income veterans programs, March 2, 2016
- Advocates’ letter to the FCC urging rulemaking on broadband privacy, Jan. 20, 2016 and fact sheet
- Ex-parte group letter to the Federal Communications Commission supporting modernizing the Lifeline program to include broadband services, Nov. 12, 2015
- Group letter to the MA Joint Committee on Telecommunications, Utilities and Energy opposing H2867, Nov. 9, 2015
- Group letter urging U.S. Senators to support the Help Americans Never Get Unwanted Phone calls (HANGUP) bill, Nov. 2, 2015
- Group letter to the FCC re: PS Docket No. 14-17; GN Docket No. 13-5; RM-11358 urging movement on rulemaking to protect consumer access to phone and communication services during the technology transition, June 25, 2015
- Ex parte letter to the FCC re ongoing issues related to the Telephone Consumer Protection Act, April 28, 2015
- **Ex parte letter to the FCC re ongoing attempts by industry to weaken the consumer protections of the Telephone Consumer Protection Act**, Jan. 16, 2015
- Group letter to the FCC re: **opposing the American Bankers Association exemption to the Telecommunications Consumer Protection Act to allow robocalls to cell phones**, Jan. 13, 2015
- **Leadership Council coalition letter to the FCC re: need for additional steps to ensure better media ownership diversity**, Aug. 11, 2014
- **Ex parte letter to the FCC summarizing a conversation with consumer and industry groups regarding the technology transition of the current phone system**, May 15, 2014
- **Group letter to FCC letter regarding notice of Ex Parte presentation**, May 12, 2014
- Joint groups’ **FCC ex parte letter regarding carriers force-migrating residential phone customers off of regulated service and onto wireless and fiber service**, May 12, 2014.
- **Group letter to the U.S. Senate Committee on Commerce, Science, and Transportation in support of the Lifeline phone discount program**, Sept. 12, 2013
- **Group letter** to the FCC urging action to protect consumers from cramming charges, April 18, 2012
- **Group letter** to the FCC requesting clarification that Lifeline customers with duplicate enrollments remain eligible to maintain one Lifeline service, Mar. 9, 2012
- NCLC and Consumer Groups **Letter** to the FCC urging rejection of proposed changes to the Universal Service Fund in industry’s ABC Plan, October 4, 2011
- NCLC/ABLE **letter** to the Chairman of the FCC on classification of broadband service as a telecommunications service under Title II, May 4, 2010

### Additional Resources

- Op-ed by National Consumer Law Center attorney Olivia Wein in *The Hill* “**The FCC Should Not Hang Up on Low-Income Disaster Survivors.**” November 7, 2018
- Op-ed by National Consumer Law Center attorney Olivia Wein in *Governing Magazine* “**How Governments Can Keep Disaster Survivors Connected with Affordable Telecommunications.**” November 2, 2018
- Class Actions and the Telephone Consumer Protection Act, *Who Benefits? Seven Myths and Facts*
- **PowerPoint**: NLEIC 2004: A Lifeline for Telephone Customers
- NCLC’s Energy and Utility Publications and Resources