

**Congress of the United States**  
**Washington, DC 20515**

June 18, 2015

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The Honorable Thomas Wheeler  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Chairman Wheeler:

We write to share our thoughts regarding modernization of the Lifeline program supported by the federal Universal Service Fund. The Lifeline program was created in 1985 and has been invaluable in enabling millions of low-income households, including many minority households, to have affordable access to the nation's telecommunications networks.

Expansion of the Lifeline program to include wireless services in 2008 was a dramatic enhancement to the program since it brought the benefits of mobility and greater connectivity to low-income families for whom a working cell phone had been an unaffordable luxury. Further modernization of the program to include broadband will bring Lifeline recipients the connections they need to participate in the 21<sup>st</sup> Century economy.

Opponents of the Lifeline program have claimed participation in the program had "ballooned" to over 18 million participants in 2012. Yet data compiled by the Universal Service Administrative Company show there were slightly more than 16 million participants in 2012 and 12 million as of March 2015. It is also important to note that the amount of Lifeline support has decreased from \$2.13 billion in 2012 to a projected \$1.44 billion in 2015. These sharp declines in program enrollment and disbursements demonstrate the effectiveness of the FCC's 2012 program reforms.

We understand that the Commission will soon be considering additional reforms to the Lifeline program and that it has already received input from various stakeholders. To that end, we write to share our thoughts and suggestions:

**1. NO CAPS**

Under no circumstances should Lifeline be "capped" if the effect of such a cap would be to deny program enrollment to qualified low-income households once some arbitrary "cap" amount had been reached. The government would not deny SNAP benefits to low-income consumers after a certain number of persons were enrolled, nor would it deny Medicaid benefits on that basis. With only about one-half of the nation's Lifeline-eligible households currently enrolled, the program still is not reaching millions of economically-disadvantaged families, including many African American and other disadvantaged minority households.

**2. NO MANDATORY COPAY REQUIREMENT**

Participation in the Lifeline program should not be contingent on payment of a mandatory fee or co-pay requirement as there is no correlation between mandatory payments and fraud prevention. Even a “modest” monthly fee would negatively impact many of our constituents and force them out of the program.

**3. THIRD-PARTY ELIGIBILITY VERIFICATION**

Currently, providers participating in the Lifeline program are required to verify the eligibility of applicants for enrollment in the program. The process of having providers verify the eligibility of those participants can have a negative impact on program integrity and can lead to program abuse. In order to best protect the Lifeline program, its participating providers, and beneficiaries, a third-party eligibility verification system should be considered as an alternative or addition to the current system.

**4. UPDATE ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION PROCESS**

The Eligible Telecommunications Carrier designation process – a process mandated by federal statute – needs to be reformed and made nationally consistent. It is critical that Lifeline beneficiaries have access to all the tools of a highly technology-driven economy including access to broadband. Expanding, updating, and streamlining the ETC designation process to include non-ETCs will ensure the program has the ability to provide essential telecommunications services to the greatest number of qualified people.

We appreciate the Commission recognizing the importance of the Lifeline program to millions of low-income American households and its commitment to reforming the program. We urge the Commission to proceed with reforming the Lifeline program in a responsible manner that focuses on program integrity while ensuring the most vulnerable Americans, including many African Americans and other disadvantaged minorities, have access to services many of us take for granted.

Thank you very much.

Very truly yours,



G. K. Butterfield  
Member of Congress

Bobby L. Rush  
Member of Congress

Yvette D. Clarke  
Member of Congress