



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 4, 2018

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
2322A Rayburn House Office Building  
Washington, D.C. 20515

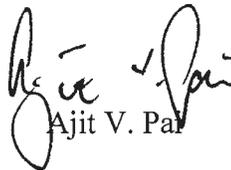
Dear Congressman Pallone:

Thank you for your May 22, 2018 letter. As of that date, the FCC had already responded to 21 of the 26 letters that were attached to your correspondence. And in the last two weeks, we have responded to the remaining five letters. For your convenience, I am including with this letter copies of all this correspondence.

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I appreciate your interest in this matter.

Sincerely,



Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 4, 2018

The Honorable Mike Doyle  
Ranking Member  
Subcommittee on Communications and Technology  
Committee on Energy and Commerce  
U.S. House of Representatives  
2322A Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your May 22, 2018 letter. As of that date, the FCC had already responded to 21 of the 26 letters that were attached to your correspondence. And in the last two weeks, we have responded to the remaining five letters. For your convenience, I am including with this letter copies of all this correspondence.

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 4, 2018

The Honorable Peter Welch  
U.S. House of Representatives  
2303 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Welch:

Thank you for your May 22, 2018 letter. As of that date, the FCC had already responded to 21 of the 26 letters that were attached to your correspondence. And in the last two weeks, we have responded to the remaining five letters. For your convenience, I am including with this letter copies of all this correspondence.

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 4, 2018

The Honorable Yvette D. Clarke  
U.S. House of Representatives  
2058 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Clarke:

Thank you for your May 22, 2018 letter. As of that date, the FCC had already responded to 21 of the 26 letters that were attached to your correspondence. And in the last two weeks, we have responded to the remaining five letters. For your convenience, I am including with this letter copies of all this correspondence.

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 4, 2018

The Honorable Dave Loebsack  
U.S. House of Representatives  
1527 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Loebsack:

Thank you for your May 22, 2018 letter. As of that date, the FCC had already responded to 21 of the 26 letters that were attached to your correspondence. And in the last two weeks, we have responded to the remaining five letters. For your convenience, I am including with this letter copies of all this correspondence.

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 4, 2018

The Honorable Debbie Dingell  
U.S. House of Representatives  
116 Cannon House Office Building  
Washington, D.C. 20515

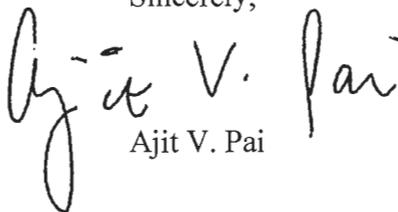
Dear Congresswoman Dingell:

Thank you for your May 22, 2018 letter. As of that date, the FCC had already responded to 21 of the 26 letters that were attached to your correspondence. And in the last two weeks, we have responded to the remaining five letters. For your convenience, I am including with this letter copies of all this correspondence.

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 4, 2018

The Honorable Raul Ruiz  
U.S. House of Representatives  
1319 Longworth House Office Building  
Washington, D.C. 20515

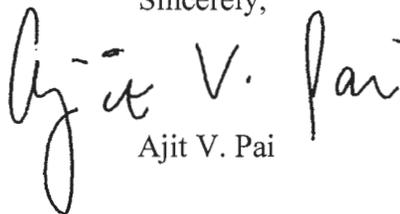
Dear Congressman Ruiz:

Thank you for your May 22, 2018 letter. As of that date, the FCC had already responded to 21 of the 26 letters that were attached to your correspondence. And in the last two weeks, we have responded to the remaining five letters. For your convenience, I am including with this letter copies of all this correspondence.

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 4, 2018

The Honorable Bobby L. Rush  
U.S. House of Representatives  
2188 Rayburn House Office Building  
Washington, D.C. 20515

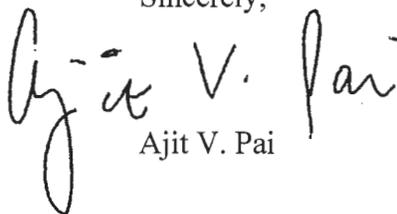
Dear Congressman Rush:

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 4, 2018

The Honorable Anna G. Eshoo  
U.S. House of Representatives  
241 Cannon House Office Building  
Washington, D.C. 20515

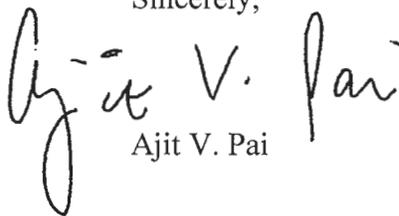
Dear Congresswoman Eshoo:

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 4, 2018

The Honorable Eliot L. Engel  
U.S. House of Representatives  
2462 Rayburn House Office Building  
Washington, D.C. 20515

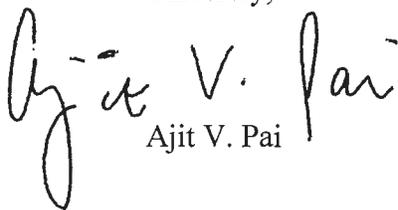
Dear Congressman Engel:

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 4, 2018

The Honorable G.K. Butterfield  
U.S. House of Representatives  
2080 Rayburn House Office Building  
Washington, D.C. 20515

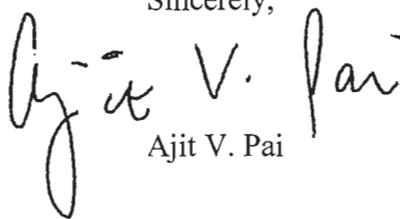
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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 4, 2018

The Honorable Jerry McNerney  
U.S. House of Representatives  
2265 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman McNerney:

Thank you for your May 22, 2018 letter. As of that date, the FCC had already responded to 21 of the 26 letters that were attached to your correspondence. And in the last two weeks, we have responded to the remaining five letters. For your convenience, I am including with this letter copies of all this correspondence.

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 4, 2018

The Honorable Doris Matsui  
U.S. House of Representatives  
2311 Rayburn House Office Building  
Washington, D.C. 20515

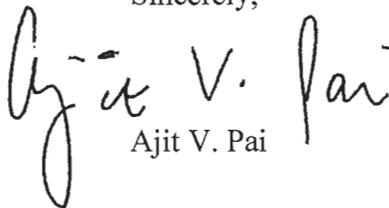
Dear Congresswoman Matsui:

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 18, 2017

The Honorable Amy Klobuchar  
United States Senate  
302 Hart Senate Office Building  
Washington, D.C. 20510

Dear Senator Klobuchar:

Thank you for your letter regarding the March 8<sup>th</sup> outage of 911 service suffered by AT&T customers. I share your concern that 911 service remains a reliable lifeline for all Americans.

Immediately after learning of the outage, I directed the Public Safety and Homeland Security Bureau to investigate the situation. I am pleased to provide you with a copy of the Bureau's report, which analyzes the cause of the outage and provides recommendations for next steps to help prevent or mitigate similar events in the future.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai

Enclosure



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 18, 2017

The Honorable Anna G. Eshoo  
U.S. House of Representatives  
241 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Eshoo:

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Ajit V. Pai

Enclosure

**March 8<sup>th</sup>, 2017 AT&T VoLTE 911 Outage  
Report and Recommendations  
Public Safety Docket No. 17-68**

A Report of the Public Safety and Homeland Security Bureau  
Federal Communications Commission  
May 2017

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## **I. EXECUTIVE SUMMARY**

1. On the afternoon of March 8<sup>th</sup>, 2017, nearly all AT&T Mobility (AT&T)<sup>1</sup> Voice over LTE customers across the nation lost 911 service for five hours.<sup>2</sup> Federal Communications Commission (Commission) Chairman Ajit Pai immediately directed the Public Safety and Homeland Security Bureau (Bureau) to investigate the causes, effects and implications of the outage.<sup>3</sup> In response, the Bureau reviewed and analyzed outage reports filed in its Network Outage Reporting System (NORS),<sup>4</sup> as well as sought and reviewed public comments and related documents, and held meetings with relevant stakeholders, including service providers and public safety entities. The Bureau also examined the record to identify ways to prevent future occurrences of such an outage. This report presents the Bureau's findings.

2. As described in greater detail below, the outage was caused by an error that likely could have been avoided had AT&T implemented additional checks (*e.g.*, followed certain network reliability best practices) with respect to their critical 911 network assets. Approximately 12,600 unique users attempted to call 911, but were unable to reach emergency services through the traditional 911 network. This was one of the largest 911 outages ever reported in NORS, as measured by the number of unique users affected.

3. Among the lessons learned from the March 8<sup>th</sup> outage is that when 911 service fails for any reason, Public Safety Answering Points (PSAPs) play a critical role in advising their jurisdictions of alternative ways to reach help. While AT&T and their subcontractors, Comtech and West, made efforts to notify thousands of PSAPs, the notifications were often unclear or missing important information, and generally took a few hours to occur. This outage also offers an illuminating case study that illustrates actions that stakeholders can take to promote network reliability and continued access to 911 service. For example, the March 8<sup>th</sup> outage emphasizes the importance of auditing all network assets critical to the provision of 911 service, and ensuring that such assets are safeguarded and designed to avoid single points of failure. The outage also demonstrates the need for closer coordination between industry and PSAPs, to improve overall situational awareness and ensure consumers understand how best to reach emergency services.

## **II. BACKGROUND**

4. One of the Commission's primary objectives is to "make available, so far as possible, to all people of the United States . . . a . . . wire and radio communication service . . . for the purpose of promoting safety of life and property."<sup>5</sup> In furtherance of this objective, the Commission has taken

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<sup>1</sup> AT&T Mobility LLC is a wholly-owned subsidiary of AT&T that provides wireless services to 135 million subscribers in the United States. *See* AT&T Inc., Form 8-K, Current Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 (Jan. 25, 2017).

<sup>2</sup> Voice over long-term evolution (Voice over LTE, or VoLTE) is a technology specification that defines the standards and procedures for delivering voice communication and data over 4G LTE networks.

<sup>3</sup> *See* Press Release, FCC, FCC Chairman Ajit Pai Announces Investigation into Yesterday's 911 Outage (March 9, 2017), [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-343825A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-343825A1.pdf).

<sup>4</sup> NORS is the Commission's web-based filing system through which communications providers covered by the Part 4 outage reporting rules must submit reports to the Commission. These reports are presumed confidential to protect sensitive and proprietary information about communications networks. *See* 47 CFR § 4.2.

<sup>5</sup> The Communications Act of 1934 established the FCC, in part, "for the purpose of promoting safety of life and property through the use of wire and radio communication." 47 U.S.C. § 151. Congress has repeatedly and

(continued....)

measures to promote the reliable and continued availability of 911 telecommunications service. In 1997, the Commission adopted rules requiring Commercial Mobile Radio Service (CMRS) providers to implement 911 and Enhanced 911 services, and to “transmit all wireless 911 calls without respect to their call validation process to a Public Safety Answering Point.”<sup>6</sup>

5. The Commission has adopted PSAP outage notification requirements where service outages could affect the delivery of 911 calls. In the *2004 Part 4 Report and Order*, the Commission required “originating service providers” to notify PSAPs “as soon as possible” when they have experienced an outage that “potentially affects” a 911 special facility, and convey “all available information that may be useful to the management of the affected facility in mitigating the effects of the outage on callers to that facility.”<sup>7</sup> Originating service providers include cable communications providers, satellite operators, wireless service providers, and wireline communications providers – entities that offer the ability “to originate 911 calls.”<sup>8</sup> In the 2013 *911 Reliability Order*, the Commission adopted PSAP outage notification requirements for service providers that offer core 911 capabilities or deliver 911 calls and associated number or location information to the appropriate PSAP, defining them as “covered 911 service providers.”<sup>9</sup> The Commission required covered 911 service providers to notify 911 special

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specifically endorsed a role for the Commission in the nationwide implementation of advanced 911 capabilities. *See* Wireless Communications and Public Safety Act of 1999, PL 106–81, 113 Stat 1286 §§ 3(a), (b) (1999) (codified at 47 U.S.C. § 251(e)(3), 47 U.S.C. § 615) (directing the Commission to “designate 911 as the universal emergency telephone number within the United States for reporting an emergency to appropriate authorities and requesting assistance” and to “encourage and support efforts by States to deploy comprehensive end-to-end emergency communications infrastructure and programs, based on coordinated statewide plans, including seamless, ubiquitous, reliable wireless telecommunications networks and enhanced wireless 911 service.”); *see also* New and Emerging Technologies 911 Improvement Act of 2008 (NET 911 Act), PL 110–283, 122 Stat 2620 (2008) (codified at 47 U.S.C. § 615a-1(a), (c)(1)(B)) (requiring “each IP-enabled voice service provider to provide 9-1-1 service and enhanced 9-1-1 service to its subscribers in accordance with the requirements of the Federal Communications Commission”); Twenty-First Century Communications and Video Accessibility Act of 2010, PL 111-260, 124 Stat 2751 § 106(g) (2010) (CVAA) (codified at 47 U.S.C. § 615c(g)).

<sup>6</sup> *See Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, RM-8143, Memorandum Opinion and Order, 12 FCC Rcd 22665, 22744 (1997); *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission’s Rules for Access to Support the Transition from TTY to Real-Time Text Technology and Petition for Waiver of the Rules Requiring Support for TTY Technology*, CG Docket No. 16-145, GN Docket No. 15-178, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 13568 (2016) (applying an analogous requirement to common carriers); *see also* 47 CFR § 20.18(b); 47 CFR § 64.3001.

<sup>7</sup> *See New Part 4 of the Commission’s Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, 19 FCC Rcd 16830 (2004) (*2004 Part 4 Report and Order*); 47 CFR § 4.9.

<sup>8</sup> 47 CFR § 12.4(a)(4)(ii)(B) (defining an originating service provider); 47 CFR §§ 4.9(a), (c), (e), (f) (detailing parallel PSAP notification requirements for cable, satellite, wireless and wireline service providers); *see also Improving 911 Reliability; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket Nos. 13-75, 11-60, Report and Order, 28 FCC Rcd 17476, 17488-89, para. 36 (2013) (*911 Reliability Order*).

<sup>9</sup> *See* 47 CFR § 12.4(a)(4) (defining covered 911 service providers as entities that provide call routing, automatic location information (ALI), automatic number information (ANI), or the functional equivalent of those capabilities “directly to a public safety answering point” or appropriate local emergency authority, and can also include entities that operate one or more central offices that directly serve a PSAP); *see also 911 Reliability Order*, 28 FCC Rcd at 17490, para. 37 (stating that the Commission’s adopted definition of covered 911 service provider reflects that “while most current 911 networks rely on the infrastructure of an incumbent local exchange carrier (ILEC), no

(continued....)

facilities of outages that potentially affect them within 30 minutes of discovering an outage.<sup>10</sup> The Commission further required that covered 911 service providers update PSAPs within two hours of their initial contact in order to communicate available information about the nature of the outage, its best-known cause, geographic scope, and the estimated time for repairs.<sup>11</sup> In its comments to this 2013 proceeding, APCO urged the Commission to extend these more specific PSAP notification rules to originating service providers as well, but the Commission declined to do so because covered 911 service providers “are the entities most likely to experience outages affecting 911 service,” and deferred the issue for future consideration.<sup>12</sup>

6. In addition to adopting PSAP outage notification requirements, the *911 Reliability Order* also adopted 911 network reliability requirements for covered 911 service providers.<sup>13</sup> These requirements were based on best practices developed and recommended by the Commission’s federal advisory committee, the Communications Security, Reliability, and Interoperability Council (CSRIC) and were intended to address the network reliability problems that were brought to light by the 2012 “derecho” storm outages.<sup>14</sup> The Commission’s 911 reliability rules require covered 911 service providers to “certify annually whether they have, within the past year, audited the physical diversity of critical 911 circuits or equivalent data paths to each PSAP they serve, tagged those circuits to minimize the risk that

(Continued from previous page) \_\_\_\_\_

single type of entity will always provide 911 service in every community,” especially in light of the IP transition, and recognizing that “overbroad rules could inadvertently impose obligations on entities that provide peripheral support for NG911 but may not play a central role in ensuring 911 reliability or benefit as much as a typical circuit-switched ILEC from the best practices” integrated into the Commission’s 911 network reliability rules).

<sup>10</sup> Compare 47 CFR § 4.9(h) (requiring covered 911 service providers to notify affected PSAPs “no later than 30 minutes from discovering the outage) with 47 CFR § 4.9(e) (requiring originating service providers to notify affected PSAPs “as soon as possible”). The Commission’s PSAP notification requirements for covered 911 service providers are generally more specific than those that apply to originating service providers, requiring covered 911 service providers (as defined in 47 CFR § 12.4(a)(4)) to “convey all available information that may be useful in mitigating the effects of the outage, as well as a name, telephone number, and e-mail address at which the service provider can be reached for follow-up.” See 47 CFR § 4.9(h). Further, covered 911 service providers must “communicate additional material information to the affected 911 special facility as it becomes available, but no later than two hours after the initial contact,” including “the nature of the outage, its best-known cause, the geographic scope of the outage, the estimated time for repairs, and any other information that may be useful to the management of the affected facility.” See *id.* Finally, covered 911 service providers must notify PSAPs by telephone *and* in writing via electronic means in the absence of another method mutually agreed upon in advance by the 911 special facility and the covered 911 service provider. See *id.*

<sup>11</sup> See *id.*

<sup>12</sup> *911 Reliability Order*, 28 FCC Rcd at 17528-29, para. 147; see also Letter from Robert M. Gurss, Senior Regulatory Counsel, APCO International, to Marlene Dortch, Secretary, Federal Communications Commission, PS Docket Nos. 13-75, 11-60, at 1 (filed June 17, 2013) (arguing that “the definition of ‘911 service provider’ for purposes of outage notification requirements should be sufficiently broad to include any facilities or services involved in the initiation, transport, or delivery of a 911 call,” including wireline, wireless, and interconnected VoIP providers and transport systems associated with the delivery of call and caller information).

<sup>13</sup> See 47 CFR §§ 12.4(b)-(c).

<sup>14</sup> See *911 Reliability Order*, 28 FCC Rcd at 17489-91, 17493-98, paras. 36-43, 48-65. The National Weather Service defines a derecho as “a widespread, long-lived wind storm that is associated with a band of rapidly moving showers or thunderstorms. Robert H. Johns, Jeffrey S. Evans, & Stephen F. Corfidi, *About Derechos*, NOAA-NWS-NCEP Storm Prediction Center (Nov. 7, 2012), <http://www.spc.noaa.gov/misc/AbtDerechos/derechofacts.htm>.

they will be reconfigured at some future date, and eliminated all single points of failure.”<sup>15</sup> In the alternative, the Commission permitted covered 911 service providers to describe “reasonably sufficient alternative measures they have taken to mitigate the risks associated with the lack of physical diversity.”<sup>16</sup> In 2014, the Commission proposed to revise these 911 reliability requirements to address failures that led to the 2014 multi-state outages, and proposed additional mechanisms designed to ensure that the Commission’s 911 governance structure kept pace with evolving technologies and new reliability challenges.<sup>17</sup>

### **III. FACTUAL FINDINGS ABOUT THE MARCH 8<sup>TH</sup> OUTAGE**

7. ***Description of Normal 911 Call Processing in AT&T’s VoLTE Network.*** During an emergency, an individual should be able to dial “911” from anywhere in the Nation and be connected to the appropriate PSAP. AT&T provides this service, which entails significant call routing and processing, in its role as an originating service provider.<sup>18</sup> The call routing and processing steps for AT&T’s VoLTE network are described below.

- 1) An AT&T customer dials “911” on their mobile phone while on AT&T’s VoLTE network.
- 2) The caller is connected to a sector of a nearby LTE cell tower.
- 3) Upon recognizing the call as a 911 call, AT&T’s 911 network sends only the call data to one of its 911 call routing service subcontractors.
- 4) The subcontractor determines the appropriate PSAP to receive the 911 call based on the caller’s geographic location, and adds metadata to the call that will enable AT&T to route it to the appropriate PSAP.

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<sup>15</sup> *911 Reliability Order*, 28 FCC Rcd at 17503, para. 80; *see also* 47 CFR § 12.4(c)(1). Regular circuit diversity audits are a CSRIC best practice. *See* CSRIC Best Practice 8-7-0532, <https://www.fcc.gov/nors/outage/bestpractice/DetailedBestPractice.cfm?number=8-7-0532> (last visited Apr. 18, 2017). Diversity audits check for “single points of failure” in network configurations, while tagging ensures that changes to critical 911 assets cannot be made without rigorous review.

<sup>16</sup> *911 Reliability Order*, 28 FCC Rcd at 17503, para. 80; 47 CFR § 12.4(b). This 2013 proceeding deferred for future consideration whether network reliability requirements should be extended to originating service providers. *See 911 Reliability Order*, 28 FCC Rcd at 17528-29, para. 147. The Commission took additional steps in 2016 to promote wireless resiliency by finding that the voluntary Wireless Network Resiliency Cooperative Framework “provides a rational basis for promoting an alternative path toward improved wireless resiliency without the need for relying on regulatory approaches.” *See Improving the Resiliency of Mobile Wireless Communications Networks; Reliability and Continuity of Communications Networks, Including Broadband Technologies*, PS Docket Nos. 13-239, 11-60, Order, 31 FCC Rcd 13745 (2016) (*Mobile Wireless Resiliency Order*). The voluntary framework approved in that order applies only to emergencies in which the FCC activates the Disaster Information Reporting System (DIRS). The Commission closed this Mobile Wireless Resiliency proceeding with this *Order*.

<sup>17</sup> *See generally 911 Governance and Accountability; Improving 911 Reliability*, PS Docket Nos. 14-193, 13-75, Policy Statement and Notice of Proposed Rulemaking, 29 FCC Rcd 14208 (2014) (*911 Governance NPRM*) (examining methods to ensure end-to-end responsibility for the provision of 911 service). Among other measures, the *911 Governance NPRM* sought comment on whether the Commission’s 911 network reliability provisions should apply to originating service providers, and on measures to improve PSAPs’ situational awareness during outages. *See id.*

<sup>18</sup> *See* 47 CFR § 12.4(a)(4)(ii)(B).

- 5) The subcontractor returns the 911 call data, now with information regarding the appropriate PSAP to receive the 911 call, back to AT&T.
- 6) Based on this information, AT&T delivers the call to the local exchange carrier that serves the appropriate PSAP.<sup>19</sup>
- 7) The local exchange carrier delivers the call to the appropriate PSAP and a 911 call-taker answers the phone.

8. Of particular relevance to this outage is the communications path between AT&T and its 911 call routing subcontractors, Comtech and West.<sup>20</sup> Comtech and West maintain call routing information for separate geographic regions for AT&T within the United States. AT&T decides whether to send the 911 call to Comtech or West (in step 3 described above) based on the caller's geographic location by using a node called the Proxy Location Routing Function (PLRF). This node determines whether Comtech or West serves the geographic area from which the call originated by using information about the caller's cell site sector. AT&T sends the call data to one of two gateways that Comtech and West can access. These gateways, known as Session Border Controllers, control access between AT&T's network and external networks.<sup>21</sup>

9. When Comtech or West returns the supplemented 911 call data to AT&T's 911 network in step 5, the Session Border Controllers perform a check to make sure that the incoming traffic originates from a predetermined set of IP addresses that AT&T's 911 live network is programmed to trust. This list of trusted IP addresses is called a "whitelist." This policy protects AT&T's 911 network from unintentional or malicious traffic. AT&T maintains a record of whitelisted IP addresses in a customer provisioning system. A technical illustration of AT&T's 911 architecture, as well as how this outage occurred, is provided as Appendix A.<sup>22</sup>

10. ***Root Causes of the Outage.*** The failures that caused this outage occurred entirely within AT&T's network. As outlined above, AT&T maintains connections with Comtech and West to obtain 911 call routing information. The connections between AT&T and Comtech and between AT&T and West are critical to 911 call routing because connectivity to Comtech and West enables AT&T to access PSAP call routing information.

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<sup>19</sup> See *infra* Appendix A (Illustration of AT&T's 911 Network Architecture and Outage).

<sup>20</sup> Comtech Telecommunications Corporation (Comtech) (formerly TCS) is a provider of 911 and emergency communications infrastructure, systems and services to telecommunications service providers and public safety agencies throughout the United States. See Comtech Telecommunications Corp., Form 8-K, Current Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 (Mar. 8, 2017). West Safety Services, Inc. (West) (formerly Intrado Inc.), a wholly-owned subsidiary of West Corporation, provides emergency communications services and infrastructure systems and services to communications service providers and public safety organizations throughout the United States. See West Corporation, Form 10-K, Annual Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 (Feb. 16, 2017). West and Comtech are the two providers that offer location routing service for AT&T VoLTE calls. Comtech and West each maintain two geographically diverse Gateway Mobile Location Centers (GMLCs). GMLCs insert the Emergency Services Routing Key (ESRK) into 911 call data, allowing the call to be routed to the appropriate PSAP.

<sup>21</sup> See *infra* Appendix A (Illustration of AT&T's 911 Network Architecture and Outage) (illustrating these gateways as "SBCs").

<sup>22</sup> See *infra* Appendix A (Illustration of AT&T's 911 Network Architecture and Outage).

11. Sometime prior to March 8<sup>th</sup>, AT&T placed an incorrect record of whitelisted IP addresses into its customer provisioning system, which contains records of AT&T's network inventory.<sup>23</sup> Specifically, the incorrect record did not contain the appropriate IP addresses for Comtech. Although AT&T retains log files for its customer provisioning system for 90 days, it has not been able to determine when this incorrect record was placed into its customer provisioning system nor why it happened. AT&T also did not detect the mismatch between the whitelist in the customer provisioning system and the whitelist on the live network through routine inventory management. Nonetheless, because errors in customer provisioning system records, in themselves, do not affect the live network, communications between AT&T and Comtech were unaffected.

12. On March 8<sup>th</sup>, AT&T unintentionally broke its connection to Comtech. While working on an unrelated project, AT&T initiated a network change that pushed the record containing the incorrect whitelist onto AT&T's live network. With Comtech's IP addresses no longer included on the whitelist, the connection with Comtech was broken, disrupting the flow of information regarding the appropriate PSAP to receive certain 911 calls to AT&T's network.<sup>24</sup> Notably, AT&T was able to make this network change without extensive testing, and during peak 911 traffic hours, because the connections to the Session Border Controllers that maintained the whitelist were tagged as "customer" assets. Assets tagged as "infrastructure," in contrast, are updated separately, only after rigorous failure testing, and during specified off-peak maintenance periods.

13. When the loss of connectivity between AT&T and Comtech led both of AT&T's Session Border Controllers to fail to receive routing information from Comtech, they began to generate error messages along the paths between the Session Border Controller and the PLRF. This generated critical 911 alarms to AT&T's 911 troubleshooting team as early as sixteen minutes after the outage began.<sup>25</sup> AT&T notified its internal troubleshooting teams serially – starting with the 911 team, then the VoLTE team, then the Universal Service Platform team responsible for AT&T's VoLTE 911 network as a whole, then the Core Backbone team – all before the IP team.

14. When the PLRF received error messages from the Session Border Controllers that surpassed a certain density threshold, the PLRF responded, as programmed, by performing a soft reset on the links between itself and the Session Border Controllers.<sup>26</sup> Comtech and West both transmitted 911 call data to AT&T along each of these paths, so AT&T could not receive transmissions from either

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<sup>23</sup> A customer provisioning system contains records of a service provider's network inventory, which are assigned in the network as part of the service provisioning process. The live network refers to the actual assets in use in a service network at a given point in time.

<sup>24</sup> Comtech communicates with AT&T using many pre-approved IP addresses, but AT&T's customer provisioning system database contained only one. When it replaced the IP address whitelist for Comtech with its single entry, there was no longer a perfect match between the IP addresses from which Comtech was sending supplemented 911 call data to AT&T, and the IP addresses from which it expected, so data from Comtech as rejected.

<sup>25</sup> AT&T maintains distinct internal troubleshooting teams for each major network element. Each internal troubleshooting team is organized into tiers, with more skilled technicians assigned to higher-numbered troubleshooting tiers. Each troubleshooting team has the independent capability to escalate an issue to a higher tier or to another team, as it deems appropriate.

<sup>26</sup> This process of turning apparently malfunctioning links off and then back on (rebooting them) is designed to prevent the PLRF from continuing to look for call routing information from a non-functioning Session Border Controller when call data could be supplied via the alternate Session Border Controller.

Comtech or West while both links were turned off.<sup>27</sup> Once the links came back online, call processing resumed for West, only to be turned off again when the PLRF again performed a soft reset on the links due to a new flood of error messages because the whitelist was still broken.

15. Where AT&T failed to receive appropriate PSAP call routing information from Comtech or West for a given 911 call, AT&T routed that 911 call to the Emergency Call Relay Center, a backup call center staffed with professional call takers that could manually route the calls to the appropriate PSAP by soliciting location information from the caller.<sup>28</sup> The backup call center was not intended to address a nationwide outage and could not handle all of this additional traffic.<sup>29</sup> As a result, it dropped the overwhelming majority of calls that it received.

16. Almost five hours after the outage began, AT&T's IP Troubleshooting team discovered that a network change from its customer provisioning system coincided with the start time of the outage. The IP Troubleshooting team requested a system rollback, which occurred three minutes later, ending the outage. A timeline of AT&T's attempts to remediate this outage is provided in Appendix B.<sup>30</sup>

17. **Network Impacts.** The result was a nationwide 911 VoLTE outage on AT&T's VoLTE network lasting for five hours and one minute. The Bureau's investigation indicates that the outage affected AT&T's VoLTE wireless customers in 49 states, the District of Columbia, Puerto Rico, and the Virgin Islands.<sup>31</sup> AT&T's normal VoLTE call processing was not otherwise affected. Some localities reported not being affected by the outage, but this may have been due to PSAPs' inability to detect outages occurring in service provider networks. AT&T reports that approximately 12,600 unique callers were not able to reach 911 directly during the outage.<sup>32</sup> AT&T acknowledges that "[b]ecause the outage was widespread geographically, thousands of PSAPs were potentially affected."<sup>33</sup>

18. The 911 VoLTE outage did not affect service on AT&T's 3G network or text-to-911 messaging functions over its 4G LTE network. VoLTE 911 calls in regions of the United States that ordinarily would have been routed with support from Comtech's service could not be completed. Furthermore, although the whitelist errors only directly impacted Comtech, both West and Comtech were affected because AT&T did not maintain separate logical paths for Comtech and West between the PLRF

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<sup>27</sup> There was no independent failure in either Comtech's or West's networks.

<sup>28</sup> See *infra* Appendix A (Illustration of AT&T's 911 Network Architecture and Outage) (referring to this backup call center as the ECRC).

<sup>29</sup> On a typical day, nearly 100 percent of calls are routed to the proper PSAP automatically, and the backup call center does not need to be engaged. To the extent that it does need to be engaged, the backup call center is designed only to handle a small fraction of calls, which (for various causes) may not route properly to the PSAP. In contrast, however, in order to be prepared to handle a nationwide outage, AT&T would have needed to maintain backup call routing sufficient to simulate the manual call-taking processes of all 6,386 Primary PSAPs nationwide. See FCC, 911 Master PSAP Registry, <https://www.fcc.gov/general/9-1-1-master-psap-registry> (last visited Apr. 26, 2017).

<sup>30</sup> See *infra* Appendix B (Outage Remediation and PSAP Notification Timeline).

<sup>31</sup> A list of the number of unique users and states affected by the outage is included as Appendix C. See *infra* Appendix C (Unique Users Impacted by State).

<sup>32</sup> See AT&T, Final NORS Report (Apr. 11, 2017). A small subset of these calls were completed after being rerouted to the Emergency Call Relay Center, until that backup call center became overloaded.

<sup>33</sup> AT&T Services, Inc. Comments, PS Docket Nos. 17-68, at 4 (filed April 7, 2017).

and the Session Border Controller.<sup>34</sup> Calls from the remainder of the country that ordinarily would have been routed with support from West's service were unable to be completed while the links were turned off, even though there was no independent failure in West's network. During the intervals when these links were turned back on, VoLTE 911 calls that were directed to West for routing information were able to complete as normal. As the outage persisted, the links continued to flap on and off, causing VoLTE 911 calls supported by West to cycle between working and non-working states.

19. ***Notifications to PSAPs.*** Most, but apparently not all PSAPs received word of the outage affecting AT&T customers from a variety of sources, including direct notification from AT&T, Comtech, and West. PSAPs received notification by both phone and e-mail.<sup>35</sup> The first notice sent to a PSAP, which was by AT&T, occurred approximately 3½ hours after the outage started, approximately 2½ hours after AT&T sent internal mass notifications to company executives and senior staff about the event, and approximately 2 hours after Comtech learned, in conversation with AT&T, that no calls to 911 were getting through.<sup>36</sup> Specifically, AT&T began notifying a handful of PSAPs at 19:26 CST, over three and half hours after the outage started, via phone and e-mail.<sup>37</sup> At 19:58 CST, AT&T sent an e-mail communication to all of the approximately 3,800 PSAPs served by AT&T Wireline services. At 20:11 CST, Comtech sent notifications informing over 5,300 PSAPs nationwide of the outage and its resolution.<sup>38</sup> At 20:25 CST, West sent notification e-mails to all of the approximately 4,784 wireless PSAPs in its database, and it sent a follow-up notification of the outage's resolution approximately an

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<sup>34</sup> Logical diversity, sometimes called equipment diversity, means that two circuits are provisioned to use different transmission equipment, but could share the same transmission medium (for example, the same fiber or conduit). *See 911 Reliability Order*, 28 FCC Rcd at 17504, para. 83 (providing examples of logical diversity as contrasted with physical diversity).

<sup>35</sup> Some public safety entities report a preference for notification via phone, rather than e-mail, during an outage. *See, e.g.*, Letter from Julie Righter Dove, PSAP Official, Lincoln/Lancaster, Nebraska 911, to Federal Communications Commission, PS Docket No. 17-68, at 1 (filed Apr. 19, 2017) (Lincoln/Lancaster Nebraska 911 *Ex Parte* Letter) (stating that email is not monitored with the same priority as phone calls). Others consider e-mail notification to be acceptable, so long as it is "comprehensive and detailed." *See* Letter from Tanessa Cabe, Telecommunications Counsel, New York City Information Technology and Telecommunication, to Marlene Dortch, Secretary, Federal Communications Commission, PS Docket No. 17-68, at 1 (filed Mar. 31, 2017) (NYC ITT *Ex Parte* Letter) (stating that while e-mail notification is acceptable, e-mails should be "comprehensive and detailed" and "other forms of notification such as phone calls" are recommended "as a backup depending on the type of outage").

<sup>36</sup> *See infra* Appendix B (Outage Remediation and PSAP Notification Timeline).

<sup>37</sup> AT&T Comments at 4. A timeline illustrating AT&T's discovery and efforts to remediate this outage, as well as its efforts to notify PSAPs, is included as Appendix B. *See infra* Appendix B (Outage Remediation and PSAP Notification Timeline).

<sup>38</sup> Comtech Comments at 3.

hour later.<sup>39</sup> At least one affected PSAP in Nebraska reported receiving no notification of the outage from any service provider.<sup>40</sup> A timeline of PSAP notifications provided by AT&T is included as Appendix B.<sup>41</sup>

20. Affected PSAPs further report that when notifications occurred, they contained very little useful information about the extent or nature of the outage. For example, Minnesota PSAPs report that initial notification e-mails from Comtech were “ambiguous,” simply stating that a “potential impairment” could impact wireless 911 calls in the area.<sup>42</sup> Minnesota PSAPs found this notification confusing, particularly because they were still receiving 911 calls from AT&T customers at that time.<sup>43</sup> AT&T should have known that the outage was limited to their VoLTE service once they discovered the network error because the error only affected their 911 VoLTE infrastructure, but, according to AT&T, during the time in question, the focus was on restoring service rather than on determining the extent of the outage. In any case, this information was not conveyed to PSAPs. Comtech’s notification to Colorado PSAPs indicated that the outage was limited to 911 VoLTE calling, but included no additional information about the outage’s cause, scope, or geographic impact.<sup>44</sup> The Washington, D.C. PSAP similarly reports that notification from West “was very broad and did not give a geographical scope of the outage.”<sup>45</sup> The notifications did not include an estimated time for repairs. Some PSAPs report that they reached out directly to AT&T in order to clarify the scope and cause of the outage, but not all were successful.<sup>46</sup> Public safety entities indicate that initial notification from originating service providers should apprise PSAPs of the network elements and geographic locations affected by the outage, as well as its expected

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<sup>39</sup> See Letter from Daryl Branson, Senior 911 Telecom Analyst, Colorado Public Utilities Commission, to Marlene Dortch, Secretary, Federal Communications Commission, PS Docket No. 17-68, at 8 (filed April 3, 2017) (Colorado PUC *Ex Parte* Letter); Letter from John Haynes, Deputy Director for 9-1-1, Department of Emergency Services, The County of Chester, to Marlene Dortch, Secretary, Federal Communications Commission, PS Docket No. 17-68, at 1 (filed April 6, 2017) (Chester County, PA *Ex Parte* Letter). Some jurisdictions separate the calls according to their originating platform and deliver them to separate PSAPs. Wireless PSAPs are PSAPs to which wireless 911 calls are forwarded.

<sup>40</sup> See Lincoln/Lancaster Nebraska 911 *Ex Parte* Letter at 1; NYC ITT *Ex Parte* Letter at 1 (“The PSAC was not contacted by the carrier or any other state or federal entity regarding the incidents. The City became aware of the outage through press outlets.”); cf. AT&T Comments at 4 (“Based on the *FCC Interim Report* and various media accounts, we believe that many local governments received the notice needed to timely communicate the outage and alternate localized emergency contact information to the residents of their areas.”) citing Presentation of Lisa M. Fowlkes, Acting Bureau Chief, Public Safety and Homeland Security Bureau, FCC, *March 8<sup>th</sup> AT&T Mobility VoLTE 911 Outage Preliminary Report* (Mar. 23, 2017) (*FCC Interim Report*).

<sup>41</sup> See *infra* Appendix B (Outage Remediation and PSAP Notification Timeline).

<sup>42</sup> Letter from Dana Wahlberg, State of Minnesota 9-1-1 Program Manager, to Marlene Dortch, Secretary, Federal Communications Commission, PS Docket No. 17-68, at 1 (filed April 20, 2017) (State of Minnesota *Ex Parte* Letter).

<sup>43</sup> Minnesota Department of Public Safety *Ex Parte* Letter at 1. The calls Minnesota PSAPs received were likely from AT&T callers using legacy networks, but they did not receive sufficient information in the notification to glean this.

<sup>44</sup> Colorado PUC *Ex Parte* Letter at 21.

<sup>45</sup> Letter from Karima Holmes, Director, Office of Unified Communications, Washington, DC, to Federal Communication Commission, PS Docket No. 17-68, at 1 (filed Mar. 31, 2017) (Washington, DC OUC *Ex Parte* Letter).

<sup>46</sup> See Washington, DC OUC *Ex Parte* Letter at 1; see also Letter from Teresa Jacobs, Mayor, Orange County, Florida, to Ajit Pai, Chairman, Federal Communications Commission (Mar. 10, 2017) (on file with author).

duration.<sup>47</sup> This would provide situational awareness to PSAPs so that they can communicate with the public more effectively.<sup>48</sup>

21. AT&T indicates that both the large geographic scope and the unique circumstances of the March 8<sup>th</sup> outage impacted the timing and extent of PSAP notifications. AT&T was unaware of the extent of the outage until several hours after it began, and initially believed that the outage was located in, and limited to, 911 calls requiring Comtech’s support. In addition, because the outage was intermittent for the PSAPs served primarily with support from West and because some calls were able to get through via the backup Emergency Call Routing Center, the number of PSAPs impacted by the outage was not immediately clear.

22. Notification from affected service providers notwithstanding, PSAPs across the country used a variety of methods to determine whether they were affected by the outage, and if so, the outage’s scope. Many PSAPs – including PSAPs in Colorado and Washington, D.C. – first became aware of the outage through contact with other affected PSAPs or posts on social media.<sup>49</sup> A number of public safety entities made comparisons to historical PSAP call data to determine that an outage was occurring, and made test calls from a variety of communications service providers’ mobile devices to determine that an outage was impacting AT&T’s VoLTE network.<sup>50</sup> PSAPs that support text-to-911 also reported sending test texts and determined that text-to-911 capability remained in service for AT&T’s VoLTE customers during the outage.<sup>51</sup> These resource-intensive efforts could have been obviated by timely and effective notification from affected service providers.

23. PSAPs affected by the outage took steps to notify the public of alternative methods to reach emergency services. For example, PSAPs notified the public of alternative 10-digit emergency numbers that they could use in an emergency while 911 was unavailable for AT&T’s VoLTE customers.<sup>52</sup> APCO reports that “PSAPs and 9-1-1 authorities largely utilized social media to spread

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<sup>47</sup> APCO *Ex Parte* Letter at 1 (“PSAPs need to know where and when the outage occurred, the nature of the outage, and expected repair time.”); NYC ITT *Ex Parte* Letter at 1 (stating that notifications should include the “scope, type of event, impact, severity, granular geographic location by census tract, expected resolution time, and any other information about the outage that would be particular to New York City.”).

<sup>48</sup> See Letter from Richard Taylor, Executive Director, North Carolina 911 Board, to Federal Communications Commission, PS Docket No. 17-68, at 2 (filed Apr. 21, 2017) (NC 911 Board *Ex Parte* Letter at 1) (stating that information about an outage’s network scope, geographic scope, and estimated time of remediation helps PSAPs to decide when and how to notify the public).

<sup>49</sup> See Washington, DC OUC *Ex Parte* Letter at 1; Colorado PUC *Ex Parte* Letter at 3; Letter from Jeffrey S. Cohen, Chief Counsel, APCO International, Marlene Dortch, Secretary, Federal Communications Commission, PS Docket No. 17-68, at 1 (filed on April 10, 2017) (APCO *Ex Parte* Letter). A NASNA e-mail chain at 8:50 CST alerted PSAPs across the country to the possibility of an AT&T service outage in their area, before many PSAPs had received initial notification from any service provider. See Washington, DC OUC *Ex Parte* Letter at 1.

<sup>50</sup> See, e.g., Colorado PUC *Ex Parte* Letter at 3 (reporting that Colorado PSAPs began testing calls from AT&T devices after they received reports of an AT&T outage through an e-mail listserv indicating that at least some PSAPs in the state were unable to receive 911 VoLTE calls from AT&T devices, while others appeared to be unaffected).

<sup>51</sup> See Colorado PUC *Ex Parte* Letter at 9.

<sup>52</sup> See, e.g., Washington, DC OUC *Ex Parte* Letter at 1; Letter from Teresa Jacobs, Mayor, Orange County, Florida, to Ajit Pai, Chairman, Federal Communications Commission (Mar. 10, 2017) (on file with author).

awareness and share information about the outage.”<sup>53</sup> PSAPs in Chester County, Pennsylvania and the Washington, D.C. PSAP also requested that local media run an on-screen text crawl about the outage, and used mass notification tools to alert registered individuals.<sup>54</sup> Additionally, public safety officials in Orange County, Florida held a press conference to notify the public of the outage. PSAPs report that this outreach was successful. For example, representatives from Orange County, Florida reported that they received 172 calls to an alternative 10-digit emergency phone number in the hour and a half after they released it, far exceeding normal call volume.

24. **Public Impact.** During the outage, approximately 12,600 unique users attempted to call 911, but were unable to reach emergency services through the traditional 911 network. AT&T customers reportedly heard either fast busy signals, endless ringing or silence when they called 911.<sup>55</sup> The mayor of Orange County, Florida reports that one AT&T customer experiencing a medical emergency was unable to reach emergency services via his mobile device.<sup>56</sup> The customer was only able to reach the Orlando Fire Department through a home security system.<sup>57</sup> Motorists involved in a traffic accident in Orange County, Florida were also unable to reach 911 from their AT&T devices.<sup>58</sup> These examples highlight the critical importance of uninterrupted public access to emergency services and the reliability of 911 networks nationwide. Other localities affected by the outage did not report receiving public complaints.<sup>59</sup>

#### IV. AT&T ACTIONS TO PREVENT RECURRENCE

25. AT&T states that it has taken four major steps to prevent the recurrence of a similar 911 outage, and to improve early 911 outage detection and mitigation. First, AT&T no longer treats Session Border Controller connections between itself and its 911 call routing subcontractors as “customer” assets. Instead, AT&T now treats them as “infrastructure” assets. Changes to infrastructure assets must go through a more rigorous and careful testing process than changes to customer assets before being implemented in the live network. Had AT&T used this approach before the March 8<sup>th</sup> outage, it would likely have noticed the incorrect IP address assignment during the testing process, before it was implemented in the field.

26. Second, AT&T has made changes to its internal alarm system to make sure that the errors generated in conditions similar to the March 8<sup>th</sup> outage are received immediately and concurrently by its 911 troubleshooting team, its VoLTE troubleshooting team, and its IP team. AT&T engaged its troubleshooting teams serially, and not all teams with expertise relevant to resolving the outage were

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<sup>53</sup> See APCO *Ex Parte* Letter at 1; see also Colorado PUC *Ex Parte* Letter at 4 (stating that they used Twitter and other social media for public notification); Chester County, PA *Ex Parte* Letter at 1; Washington DC OUC *Ex Parte* Letter at 1 (stating that they used the mass notification system, AlertDC).

<sup>54</sup> See Chester County, PA *Ex Parte* Letter at 1; Washington, DC OUC *Ex Parte* Letter at 1.

<sup>55</sup> Colorado PUC *Ex Parte* Letter at 8.

<sup>56</sup> See Letter from Teresa Jacobs, Mayor, Orange County, Florida, to Ajit Pai, Chairman, Federal Communications Commission (Mar. 10, 2017) (on file with author).

<sup>57</sup> See *id.*

<sup>58</sup> See *id.*

<sup>59</sup> See, e.g., Chester County, PA *Ex Parte* Letter at 1 (stating that they received no public complaints); NC 911 Board *Ex Parte* Letter at 1 (stating that he is not aware of any negative consequences in North Carolina due to the March 8<sup>th</sup> outage and received no public feedback).

immediately notified of its occurrence. The outage could have been resolved sooner had all troubleshooting teams been involved from first alarm.

27. Third, AT&T has bifurcated the links that connect the Session Border Controllers to the PLRF. This provides Comtech and West with separate logical communications paths. Had this bifurcation been in place on March 8<sup>th</sup>, the outage would have only affected 911 calls processed by Comtech and would not have affected 911 calls processed by West. This change reduces the likelihood that a future network issue encountered by one 911 call routing information provider will impact call processing attempted by the other.

28. Fourth, AT&T has implemented a manual process to drop VoLTE service and fall back to 3G for 911 calls during VoLTE 911 outages.<sup>60</sup> During an unrelated AT&T VoLTE outage that occurred on March 11, 2017, AT&T was able to successfully deliver most 911 VoLTE calls to appropriate PSAPs.<sup>61</sup> The nature of the event caused some VoLTE customers to not be able to register on the AT&T VoLTE network, but AT&T was able to use an automated process to register some of them on their 3G network instead. This fallback mechanism did not work on March 8<sup>th</sup> because the network issue that caused the outage occurred further along in the call setup path. Had the manual mechanism that AT&T has now implemented been available in the circumstances of the March 8<sup>th</sup> outage, it could have mitigated the outage as successfully as the automated process did during the unrelated AT&T VoLTE outage on March 11<sup>th</sup>.

29. The Bureau anticipates that these voluntary changes will help AT&T to prevent a recurrence of a similar 911 outage and may help AT&T with future 911 outage detection and remediation.

## **V. NEXT STEPS**

30. The Commission has been unwavering in its commitment to ensuring continued access to 911 service. Commencing the investigation of the March 8<sup>th</sup>, 2017 VoLTE 911 outage and following through with this report is a demonstration of that commitment. But there is more to do.

31. This outage offers an illuminating case study of actions that stakeholders can take to promote network reliability and continued access to 911 service. For example, based on the Bureau's analysis of the March 8, 2017 AT&T VoLTE 911 outage, CSRIC's recommended network reliability best practices could have prevented this outage or mitigated its impact. Specifically, CSRIC recommended that network operators should establish processes for verifying that changes to network configurations minimize the possibility of call processing errors<sup>62</sup> and that network operators periodically audit their logical networks for diversity.<sup>63</sup> Had AT&T followed these best practices, it could have prevented this

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<sup>60</sup> According to AT&T, an automated process would not work in this instance because of the nature of the network connectivity issue, and because of the location in AT&T's 911 network in which the error occurred.

<sup>61</sup> The Bureau is currently in the process of investigating the March 11<sup>th</sup>, 2017 outage. The Bureau also notes that AT&T experienced another VoLTE 911 outage on May 1<sup>st</sup>, 2017. The Bureau's preliminary research indicates that these outage were unrelated and attributable to different causes than the March 8<sup>th</sup>, 2017 outage. The Bureau will produce separate case studies on its findings.

<sup>62</sup> See CSRIC Best Practice 9-9-8729, <https://www.fcc.gov/nors/outage/bestpractice/DetailedBestPractice.cfm?number=9-9-8729> (last visited May 12, 2017).

<sup>63</sup> See CSRIC Best Practice 8-7-0532, <https://www.fcc.gov/nors/outage/bestpractice/DetailedBestPractice.cfm?number=8-7-0532> (last visited Apr. 18, 2017).

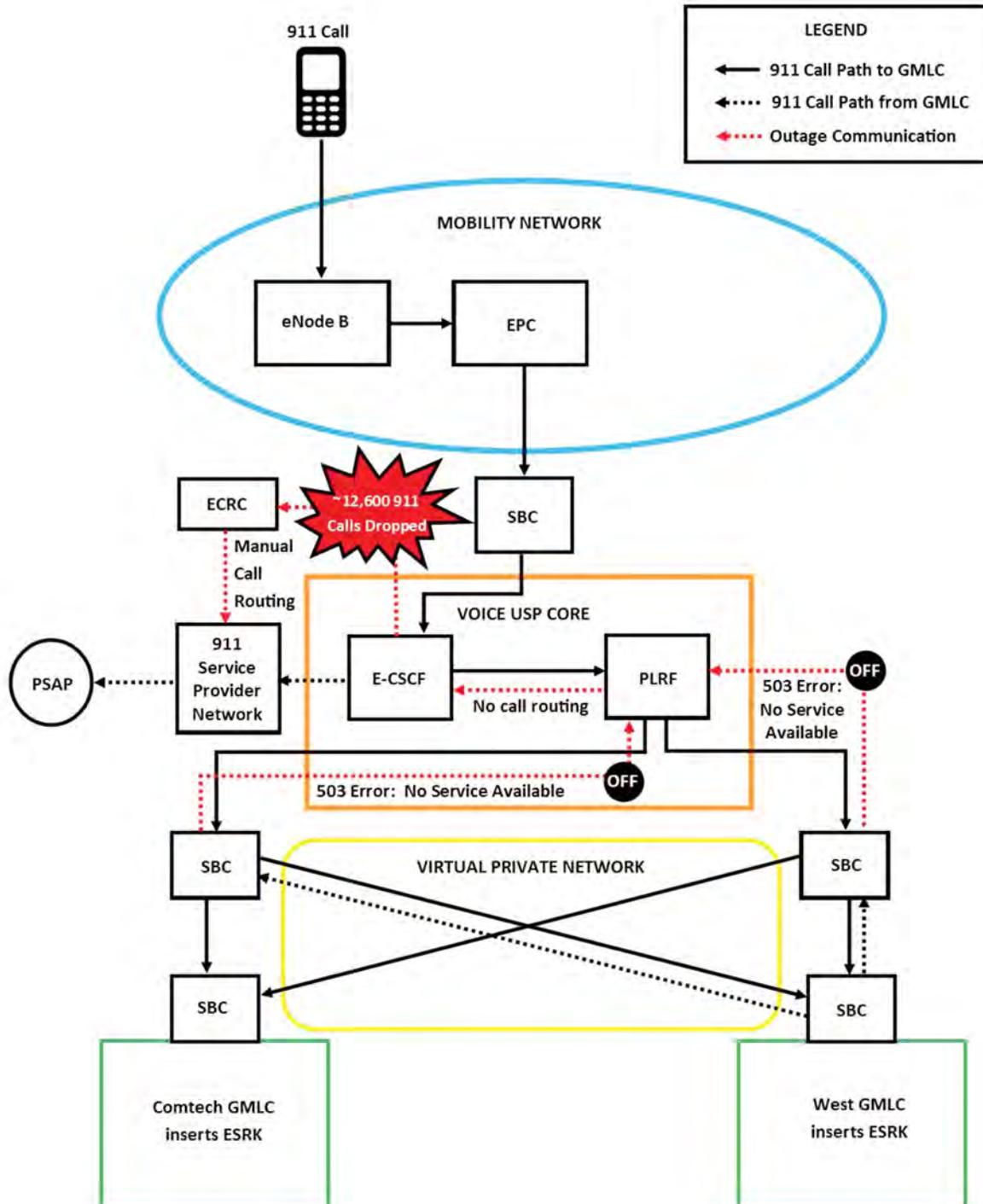
outage or mitigated its impact.

32. The Bureau plans to engage in stakeholder outreach and guidance regarding CSRIC's recommended network reliability best practices to protect against similar outages in the future. In particular, the Bureau plans to release a Public Notice reminding companies of best practices and their importance. The Bureau will also be contacting other major VoLTE providers to discuss their network practices, and will offer its assistance to smaller VoLTE providers.

33. This outage also highlights the need for close working coordination between industry and PSAPs to improve overall situational awareness and ensure consumers understand how best to reach emergency services. In particular, there is a need for further industry coordination and discussion surrounding the processes and roles that stakeholders play for informing consumers about how to continue to reach 911 during an outage. The Bureau can help to foster this kind of coordination and guidance. In this regard, the Bureau plans to conduct stakeholder outreach to help promote better understanding of 911 outage notification best practices. The Bureau will convene consumer groups, public safety entities and service providers in the 911 ecosystem to participate in a workshop in order to discuss best practices and develop recommendations for improving situational awareness during 911 outages, including strengthening PSAP outage notifications and how to best communicate with consumers about alternative methods of accessing emergency services.

APPENDIX A  
Illustration of AT&T's 911 Architecture and Outage

AT&T 911 Infrastructure and Outage



**Glossary**

**EPC – Evolved Packet Core:** A framework which combines voice and data on a 4G LTE network.

**SBC – Session Border Controller:** A device that authenticates, validates and controls traffic from other network elements.

**E-CSCF – Emergency Call Session Control Function:** The primary network controller responsible for managing 911 VoLTE calls.

**PLRF – Proxy Location Retrieval Function:** A device that determines whether 911 call data is should be directed to Comtech or West for processing.

**VPN – Virtual Private Network:** A method of providing secure, encrypted access to remote devices.

**GMLC – Gateway Mobile Location Center:** A control system that retrieves and provides location information of wireless devices. It has a database that indexes cell sector and PSAP location information to support emergency call routing.

**ESRK – Emergency Services Routing Key:** Metadata that is used to direct the call to the appropriate PSAP.

**ECRC – Emergency Call Relay Center:** A backup call center staffed with professional call takers that could manually route the calls to the appropriate PSAP by soliciting location information from the caller

**APPENDIX B:  
Timeline of Outage Remediation and PSAP Notification**

<b>TIME (CST)</b>	<b>EVENT DESCRIPTION</b>	<b>TIME ELAPSED</b>
15:52	Outage begins after change request initiated by customer provisioning system replaced existing route map prefix set	0 mins
16:03	Critical alarm tickets auto-created over PLRF-SBC link	11 mins
16:08	AT&T 911 Tier 1 Troubleshooting Team acknowledges the alarm tickets	16 mins
16:17	AT&T 911 Tier 2 Troubleshooting Team engaged and investigating alarms	25 mins
16:27	AT&T 911 Tier 3 Troubleshooting Team engages	35 mins
16:34	AT&T's internal operations communications center is notified for the purpose of providing internal communications related to this outage	42 mins
16:54	AT&T 911 Tier 3 Troubleshooting Team engages PLRF external vendor (node that generated alarm)	1 hr, 2 mins
17:05	911 Tier 2 Troubleshooting Team contacts Comtech NOC, and learns no 911 calls are connecting	1 hr, 13 mins
17:33 – 18:40	VoLTE Troubleshooting teams engage to assist; perform a soft reset on the links between the PLRF and the SBCs with no success	1 hr, 41 mins – 2 hrs, 48 mins
19:03 – 20:30	VoLTE Tier 3 Troubleshooting Team coordinates with Comtech and CBB troubleshooting teams to identify that there may be a routing issue preventing Comtech's traffic from being received by AT&T, although AT&T's traffic is getting through to Comtech	3 hrs, 11 mins – 4 hrs, 38 mins
19:26 – 20:39	AT&T PSAP Relations communicates with Tarrant County, Texas; Washington, DC; Arizona; California; Oregon; Michigan, Las Vegas, Nevada <sup>64</sup>	3 hrs, 34 mins – 4 hrs, 47 mins
19:58	AT&T sends e-mail notification to all AT&T Wireline PSAPs (~3,800)	4 hrs, 6 mins
20:11	Comtech notifies all PSAPs in its database (~5,300) using an e-mail listserv	4 hrs, 19 mins
20:20 – 20:45	AT&T's IP Troubleshooting team traces 911 call IP packet routing through a peering router, an unintended path.	4 hrs, 28 mins – 4 hrs, 53 mins
20:25	Upon AT&T request, West notifies all Primary wireless PSAPs in its database (~4,784)	4 hrs, 33 mins
20:50	AT&T IP Troubleshooting team discovers network change with the same start time as the outage, IP team requests system rollback	4 hrs, 58 mins

<sup>64</sup> These PSAPs either contacted AT&T during the outage or had previously requested that AT&T notify them of mobility 911 outages.

**Federal Communications Commission**

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20:53	Rollback completed. Service restored.	5 hrs, 1 min
21:14	Comtech sends notification that outage has been resolved to all PSAPs in its database (~5,300) using an email listserv	5 hrs, 22 min
21:39	Upon AT&T request, West sends notification that the outage has been resolved.	5 hrs, 37 mins

**APPENDIX C**

**Unique Users Impacted by State**

The table below reflects AT&T’s quantification of the number of unique users affected by the March 8<sup>th</sup>, 2017 AT&T Outage.

<i>State</i>	<i>Unique Users Impacted</i>
<b>AK</b>	43
<b>AL</b>	213
<b>AR</b>	240
<b>AZ</b>	107
<b>CA</b>	1473
<b>CO</b>	133
<b>CT</b>	98
<b>DC</b>	59
<b>DE</b>	32
<b>FL</b>	937
<b>GA</b>	521
<b>HI</b>	78
<b>IA</b>	21
<b>ID</b>	12
<b>IL</b>	501
<b>IN</b>	338
<b>KS</b>	73
<b>KY</b>	261
<b>LA</b>	372
<b>MA</b>	123
<b>MD</b>	255
<b>ME</b>	12
<b>MI</b>	505
<b>MN</b>	90
<b>MO</b>	328
<b>MS</b>	135
<b>MT</b>	2
<b>NC</b>	271
<b>ND</b>	6
<b>NE</b>	15
<b>NH</b>	9
<b>NJ</b>	193
<b>NM</b>	41

**Federal Communications Commission**

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NV	134
NY	563
OH	302
OK	380
OR	90
PA	456
PR	65
RI	16
SC	129
SD	11
TN	230
TX	1968
UT	65
VA	180
VI	17
VT	9
WA	238
WI	80
WV	109
<b>TOTALS</b>	
<b>49 States, the District of Columbia, Puerto Rico and the Virgin Islands<sup>65</sup></b>	12,539 Unique Users Affected

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<sup>65</sup> AT&T reports that Wyoming (WY) was not impacted by this outage. This may be due to its small population, its low population density, or the low density of AT&T LTE cell sites in Wyoming.

**APPENDIX D**  
**List of Parties Filing Comments or *Ex Parte* Notices**

**PS Docket No. 17-68**

***Commenters***

AT&T Services Inc.

Comtech Telecommunications Corp.

***Ex Parte Filers***

Association of Public-Safety Communications Officials (APCO) International

National Association of State 911 Administrators (NASNA)

Colorado Public Utilities Commission

City of New York Information Technology and Telecommunications

Arkansas Department of Emergency Management

Washington, D.C. Office of Unified Communications

California Office of Emergency Services, Emergency Communications Branch

County of Chester, Pennsylvania Department of Emergency Services

Minnesota Department of Public Safety, Emergency Communication Networks

Lincoln/Lancaster, Nebraska 911

North Carolina 911 Board

Texas Commission on State Emergency Communications

Iowa Homeland Security and Emergency Management



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Mike Doyle  
U.S. House of Representatives  
239 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your letter on, April 24, 2017, regarding the Restoring Internet Freedom Notice of Proposed Rulemaking (NPRM) adopted by the Commission on May 18, 2017. I believe in the importance of having a free and open Internet. And in this proceeding, the Commission is currently examining the best legal framework for both protecting Internet freedom and providing strong incentives for the private sector to build and expand next-generation networks so that all Americans can be connected to digital opportunity. Since becoming Chairman of the Commission I have released the text of all monthly agenda items three weeks prior to the open meetings those items will be voted on. In this proceeding the text of the Restoring Internet Freedom NPRM was released to the public on April 27, 2018. I also made myself available to you and your colleagues in a closed briefing one week later to discuss the NPRM.

Currently, the FCC is in the midst of receiving public comment on this matter, and we will go where the facts and the law lead us. Your views are very important and I look forward to continuing to work with you and your colleagues on this critical issue. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Ajit V. Pai".

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Anna Eshoo  
U.S. House of Representatives  
241 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Eshoo:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

In addition, the Commission's ownership disclosure requirements address the ownership of the broadcast station. The ownership report requirement you mention in your letter requires disclosure of the entities and individuals that hold attributable interests in the broadcast station, including any attributable ownership interests held by foreign individuals and entities. For example, if RT directly or indirectly owns a broadcast station, these ownership disclosure rules would apply and disclosure would be required.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Ajit V. Pai".

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Judy Chu  
U.S. House of Representatives  
2423 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Chu:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable David Cicilline  
U.S. House of Representatives  
2244 Rayburn House Office Building  
Washington, D.C. 20515

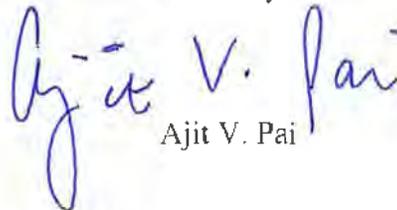
Dear Congressman Cicilline:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

July 24, 2017

The Honorable Mike Doyle  
U.S. House of Representatives  
239 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Dave Loebsack  
U.S. House of Representatives  
1527 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Loebsack:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Doris Matsui  
U.S. House of Representatives  
2311 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Matsui:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Jerry McNerney  
U.S. House of Representatives  
2265 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman McNerney:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Jimmy Panetta  
U.S. House of Representatives  
228 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Panetta:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Eric Swalwell  
U.S. House of Representatives  
129 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Swalwell:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Mark Takano  
U.S. House of Representatives  
1507 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Takano:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Peter Welch  
U.S. House of Representatives  
2303 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Welch:

Thank you for your letters regarding the Commission's sponsorship identification and public file ownership disclosure requirements. In your letter, you ask whether these requirements apply to foreign state-sponsored broadcast content and express your concern about content created by RT. The Commission's sponsorship identification rules require broadcast stations to disclose when they are paid or promised money, services, or other valuable consideration in exchange for the agreement to air particular programming. When this occurs, the Commission's rules require the broadcast station to announce (1) that the programming is sponsored and (2) who sponsored the programming. For example, if RT compensated a broadcast radio or television station for transmitting RT programming, these sponsorship identification rules would apply and disclosure would be required.

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I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Ajit V. Pai". The signature is written in a cursive style with a large initial "A".

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Mike Doyle  
Ranking Member  
Subcommittee on Communications and Technology  
Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your letter regarding the Restoring Internet Freedom Notice of Proposed Rulemaking (NPRM) adopted by the Commission on May 18, 2017. I share your view on the importance of having a free and open Internet. And in this proceeding, the Commission is currently examining the best legal framework for both protecting Internet freedom and providing strong incentives for the private sector to build and expand next-generation networks so that all Americans can be connected to digital opportunity.

Since becoming Chairman of the Commission, I have released the text of all non-enforcement monthly agenda items three weeks prior to the open meetings those items will be voted on. In this proceeding, the draft text of the Restoring Internet Freedom NPRM was released to the public on April 27, 2018. Unlike the process used in 2014, this gave the public three extra weeks to comment on this proceeding.

Currently, the FCC is in the midst of receiving public comment on this matter, with over 10 million comments – more than twice the amount from the 2014 proceeding with plenty time left for people to continue providing feedback – and we will go where the facts and the law lead us. Should any motion to extend the time for filing reply comments be filed with the Commission, it will receive appropriate consideration consistent with the facts and the law.

Your views are very important and will be entered into the record of the proceeding and considered as part of the Commission's review. I look forward to continuing to work with you and your colleagues on this critical issue. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Ajit V. Pai".

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 24, 2017

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Pallone:

Thank you for your letter regarding the Restoring Internet Freedom Notice of Proposed Rulemaking (NPRM) adopted by the Commission on May 18, 2017. I share your view on the importance of having a free and open Internet. And in this proceeding, the Commission is currently examining the best legal framework for both protecting Internet freedom and providing strong incentives for the private sector to build and expand next-generation networks so that all Americans can be connected to digital opportunity.

Since becoming Chairman of the Commission, I have released the text of all non-enforcement monthly agenda items three weeks prior to the open meetings those items will be voted on. In this proceeding, the draft text of the Restoring Internet Freedom NPRM was released to the public on April 27, 2018. Unlike the process used in 2014, this gave the public three extra weeks to comment on this proceeding.

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Sincerely,

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 21, 2017

OFFICE OF  
THE CHAIRMAN

The Honorable Gerald Connolly  
Ranking Member  
Subcommittee on Government Operations  
Committee on Oversight and Government Reform  
U.S. House of Representatives  
2238 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Connolly:

Thank you for your June 26, 2017 letter and questions concerning the Federal Communications Commission's (FCC's or Commission's) cybersecurity preparedness and its impact on the FCC's ability to accept comments from the public in ongoing proceedings.

I consider any disruption of the FCC's systems by outside parties to be a very serious matter. That's why our Information Technology (IT) staff immediately addressed the disruption to the FCC's Electronic Comment Filing System (ECFS) that began late in the evening on May 7 and mitigated the impact on filers by the morning of the following day, May 8. And following the events of May 7-8, I directed our Chief Information Officer (CIO) to take appropriate measures to continue securing the comment filing system and to report back to my staff routinely on this work. I also directed the CIO to fully assist in any official inquiries related this matter and to comply with all applicable federal guidelines and laws governing such incidents.

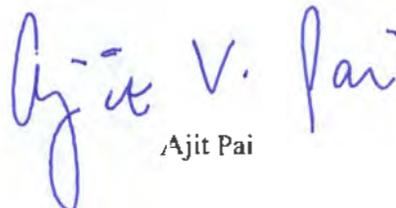
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Moreover, during the past two months, the Commission's IT staff has taken additional steps to prevent potential disruptions similar to the May 7-8 event as well as to ensure the ongoing integrity and resiliency of the system. And ECFS has performed well during the comment period following the adoption of the *Restoring Internet Freedom Notice of Proposed Rulemaking*. The docket now contains more than 10 million comments overall, demonstrating that our processes are facilitating widespread public participation in this proceeding. Indeed, the system did not experience any difficulties in the leadup to the deadline for initial comments, which was earlier this week.

Although I cannot guarantee that we will not experience further attempts to disrupt our systems, our staff is constantly monitoring and reviewing the situation so that that everyone seeking to comment on our proceedings will be afforded the opportunity to do so. We are committed to this goal and will continue to foster a transparent process that encourages public participation in our proceedings.

The CIO has provided me with the attached answers to the list of questions in your letter. Please let me know if I can be of any further assistance.

Sincerely,



Ajit Pai

Enclosure



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 21, 2017

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Pallone:

Thank you for your June 26, 2017 letter and questions concerning the Federal Communications Commission's (FCC's or Commission's) cybersecurity preparedness and its impact on the FCC's ability to accept comments from the public in ongoing proceedings.

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Sincerely,

Ajit Pai

Enclosure



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 21, 2017

The Honorable Elijah Cummings  
Ranking Member  
Committee on Oversight and Government Reform  
U.S. House of Representatives  
2163 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Cummings:

Thank you for your June 26, 2017 letter and questions concerning the Federal Communications Commission's (FCC's or Commission's) cybersecurity preparedness and its impact on the FCC's ability to accept comments from the public in ongoing proceedings.

I consider any disruption of the FCC's systems by outside parties to be a very serious matter. That's why our Information Technology (IT) staff immediately addressed the disruption to the FCC's Electronic Comment Filing System (ECFS) that began late in the evening on May 7 and mitigated the impact on filers by the morning of the following day, May 8. And following the events of May 7-8, I directed our Chief Information Officer (CIO) to take appropriate measures to continue securing the comment filing system and to report back to my staff routinely on this work. I also directed the CIO to fully assist in any official inquiries related this matter and to comply with all applicable federal guidelines and laws governing such incidents.

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Ajit Pai

Enclosure



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 21, 2017

OFFICE OF  
THE CHAIRMAN

The Honorable Diana DeGette  
Ranking Member  
Subcommittee on Oversight and Investigations  
Committee on Energy and Commerce  
U.S. House of Representatives  
2111 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman DeGette:

Thank you for your June 26, 2017 letter and questions concerning the Federal Communications Commission's (FCC's or Commission's) cybersecurity preparedness and its impact on the FCC's ability to accept comments from the public in ongoing proceedings.

I consider any disruption of the FCC's systems by outside parties to be a very serious matter. That's why our Information Technology (IT) staff immediately addressed the disruption to the FCC's Electronic Comment Filing System (ECFS) that began late in the evening on May 7 and mitigated the impact on filers by the morning of the following day, May 8. And following the events of May 7-8, I directed our Chief Information Officer (CIO) to take appropriate measures to continue securing the comment filing system and to report back to my staff routinely on this work. I also directed the CIO to fully assist in any official inquiries related this matter and to comply with all applicable federal guidelines and laws governing such incidents.

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Sincerely,

Ajit Pai

Enclosure



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 21, 2017

The Honorable Robin Kelly  
Ranking Member  
Subcommittee on Information Technology  
Committee on Oversight and Government Reform  
U.S. House of Representatives  
1239 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Kelly:

Thank you for your June 26, 2017 letter and questions concerning the Federal Communications Commission's (FCC's or Commission's) cybersecurity preparedness and its impact on the FCC's ability to accept comments from the public in ongoing proceedings.

I consider any disruption of the FCC's systems by outside parties to be a very serious matter. That's why our Information Technology (IT) staff immediately addressed the disruption to the FCC's Electronic Comment Filing System (ECFS) that began late in the evening on May 7 and mitigated the impact on filers by the morning of the following day, May 8. And following the events of May 7-8, I directed our Chief Information Officer (CIO) to take appropriate measures to continue securing the comment filing system and to report back to my staff routinely on this work. I also directed the CIO to fully assist in any official inquiries related this matter and to comply with all applicable federal guidelines and laws governing such incidents.

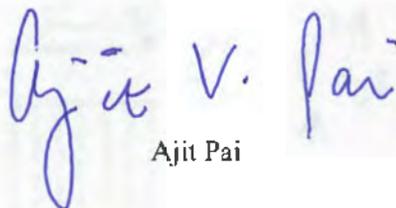
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Sincerely,



Ajit Pai

Enclosure



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

July 21, 2017

OFFICE OF  
THE CHAIRMAN

The Honorable Mike Doyle  
Ranking Member  
Subcommittee on Communications and Technology  
Committee on Energy and Commerce  
U.S. House of Representatives  
239 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your June 26, 2017 letter and questions concerning the Federal Communications Commission's (FCC's or Commission's) cybersecurity preparedness and its impact on the FCC's ability to accept comments from the public in ongoing proceedings.

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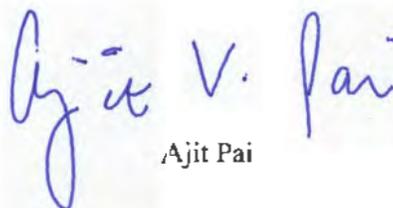
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The CIO has provided me with the attached answers to the list of questions in your letter. Please let me know if I can be of any further assistance.

Sincerely,



Ajit Pai

Enclosure

1. **According to the FCC's response to Senators Wyden and Schatz, the May 2017 incident was a "non-traditional DDoS attack" where bot traffic "increased exponentially" between 11pm EST on May 7, 2017 until 1pm EST on May 8, 2017, representing a "3,000% increase in normal volume." What "additional solutions" is the FCC pursuing to "further protect the system," as mentioned in the FCC's response?**

First, for your records, please note the following correction to your question above concerning the timing of this event. As we stated in our earlier response to Senators Wyden and Schatz, bot traffic increased exponentially from 11:00 p.m. to 1:00 a.m., EST – not 1:00 p.m. We provided this timeline to assist in understanding the nature of the attack.

Given the ongoing nature of the threats to disrupt the Commission's electronic comment filing system, it would undermine our system's security to provide a specific roadmap of the additional solutions to which we have referred. However, we can state that the FCC's IT staff has worked with commercial cloud providers to implement internet-based solutions to limit the amount of disruptive bot-related activity if another bot-driven event occurs.

The FCC also instituted a more predictive model for assessing the number of incoming comments and bot driven activity to ensure we will have more cloud-based resources available within a shorter time period to respond to potential surges in activity. In addition, the FCC implemented a control feature that recognizes when there is heavy bot traffic. This improvement allows humans (as opposed to bots) to continue to access the electronic comment filing system even if a large amount of bot activity is also present.

2. **According to the FCC, the alleged cyberattacks blocked "new human visitors . . . from visiting the comment filing system." Yet, the FCC, consulting with the FBI, determined that "the attack did not rise to the level of a major incident that would trigger further FBI involvement." What analysis did the FCC and the FBI conduct to determine that this was not a "major incident?"**

The FCC consulted with the FBI following this incident, and it was agreed this was not a "significant cyber incident" consistent with the definition contained in Presidential Policy Directive-41 (PPD-41). Equally, it is important to note the May 7-8 disruption was not a system "hack" or intrusion and at no point was the Commission's network cybersecurity breached.

3. **What specific "hardware resources" will the FCC commit to accommodate people attempting to file comments during high-profile proceedings? Does the FCC have sufficient resources for that purpose?**

The Commission's Electronic Comment Filing System is commercially cloud-based, so our "hardware resources" are provided by our commercial partners. While it would undermine our system security to provide a specific roadmap of what we are doing, we can state that FCC IT staff has notified its cloud providers of the need to have sufficient "hardware resources" available to accommodate high-profile proceedings. In addition, FCC IT staff has worked with commercial cloud providers to implement internet-based solutions to limit the amount of disruptive bot-related activity if another bot-driven event occurs.

**4. Is the FCC making alternative ways available for members of the public to file comments in the net neutrality proceeding?**

Yes, filers always have four alternatives for submitting comments: sending a written document, filing through the normal web interface, filing through the API, or submitting through the electronic inbox using the Bulk Upload Template.

**5. Did the FCC contact the National Cybersecurity and Communication Integration Center's Hunt and Incident Response Team (HIRT) at the U.S. Department of Homeland Security to investigate the May 8th, 2017 incident, and if so, which date(s) was such contact made? If the FCC did not contact HIRT to investigate the May 8th, 2017 incident, please explain why it did not do so.**

The FCC did not contact HIRT because this event was not categorized as a "significant cyber incident" under PPD-41.

**6. What were the findings from any forensic investigative analyses or reports concerning the May 8th, 2017 incident, including how and why a denial-of-service attacks were declared, and from what attack vectors they came?**

Our response to Senators Wyden and Schatz describes why we have categorized this incident as a non-traditional DDoS attack. Otherwise, the investigation is ongoing at this stage.

**7. Did the FCC notify Congress of the May 8th, 2017 incidents as provided by FISMA? And if so, how did the FCC notify Congress? If not, why not?**

Although I have been advised that the FCC's Office of Legislative Affairs provided background information on this matter to the committee offices, we did not provide a FISMA-based notification. We determined that this event was not a "major incident" under the Office of Management and Budget's (OMB) definition and hence it did not meet the criteria of a reportable incident to Congress under OMB's FISMA guidance.

Our rationale was based on the OMB guidance on FISMA contained in M-17-05, which provides instructions to agencies on when and how to report a "major incident" to Congress. Under OMB's FISMA guidance, a "major incident" is automatically a "significant cyber incident" per PPD-41, and the definitions of the two terms are closely related. As discussed in the response to question number 2, this event was not categorized as a "significant cyber incident" per PPD-41.

**8. Did the FCC notify its Office of the Inspector General (OIG) of the May 8th, 2017 incidents, and if so, when did it notify the OIG?**

The Office of the Inspector General contacted FCC's management on May 10, 2017, and we have provided information to them about the incident.



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

October 23, 2017

The Honorable Bobby L. Rush  
U.S. House of Representatives  
2188 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Rush:

Thank you for your letter regarding the designation of eligible telecommunications carriers (ETCs) to provide broadband service as Lifeline providers. You indicate that a state commission apparently advised a constituent company that it is unable to grant such a designation because section 54.201(j) of the Commission's rules preempts states from doing so. Your views are very important and will be entered into the record of the proceeding.

The Commission is committed to promoting digital opportunity and access to modern communications services for our nation's low-income families. However, the Commission must always act within the legal authority given to it by Congress. State commissions continue to retain the primary authority to designate Lifeline-only ETCs and ETCs that receive both high-cost and Lifeline funding, which are all eligible to receive Lifeline support for broadband.

Congress gave state governments, not the Commission, the primary responsibility for designating ETCs to participate in universal service under Section 214 of the Communications Act. Any ETC can receive universal service support for all Lifeline-supported services, including broadband. Section 54.201(j) of the Commission's rules only purports to limit state action with regard to the particular category of Lifeline Broadband Providers, and not to other ETC designations. States continue to play an important role in traditional non-LBP ETC designations, where state law grants them authority to do so.<sup>1</sup> To be clear, the statute and the Commission's rules do not prevent a state from exercising its jurisdiction to designate ETCs, which allows the designated carrier to provide and seek Lifeline reimbursement for voice *and* broadband services.<sup>2</sup> Indeed, since February 2017, eleven companies in fourteen different states have received ETC designations to participate in the Lifeline program, including one company that was previously granted designation as an LBP.<sup>3</sup> These designations enable the carriers to provide Lifeline-supported voice and

<sup>1</sup> 2016 Lifeline Order, 31 FCC Rcd. at 4067, para. 286.

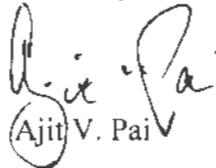
<sup>2</sup> 2016 Lifeline Order, 31 FCC Rcd at 4068, para. 288.

<sup>3</sup> See *Application of Boomerang Wireless, LLC d/b/a enTouch Wireless, Hiawatha, Iowa, Seeking Designation as an Eligible Telecommunications Carrier in the State of Nebraska for the Limited Purpose of Offering Wireless Lifeline Service to Qualified Households*, Nebraska Public Service Commission Application No. C-4852/NUSF-105 (Feb. 7, 2017); *Petition of Boomerang Wireless, LLC EnTouch Wireless, Hawai'i Public Utilities Commission, Decision And Order No. 34431* (Mar. 3, 2017); *Illinois Electric Cooperative, Illinois Commerce Commission, Order. 16-0191* (Mar. 22, 2017); *Midcontinent Communications Designated Eligible Carrier Application*, North Dakota Public

broadband services within the designated service areas granted by the state.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,



Ajit V. Pai

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Service Commission, Case No. PU-17-50 (Mar. 29, 2017); *Application of Midcontinent Commc'ns, A S. Dakota Gen. P'ship. for a Certificate of Convenience & Auth. to Provide Telecommunications Servs. Within the State of Kansas, & for Designation as an Eligible Telecommunications Carrier*, Kansas State Corporation Commission, Docket No. 17-MCCT-254-ETC (Apr. 13, 2017); *Application of Bommerang Wireless dba EnTouch Wireless for Designation as an Eligible Telecommunications Carrier*, South Dakota Public Utilities Commission, TC13-035 (Apr. 28, 2017); *Pctition of Vitelcom Cellular Inc., for Designation as an Eligible Telecommunications Carrier – Lifeline Only*, Government of the Virgin Islands of the United States of America, Public Service Commission, Docket No. 661, Order No. 55/2017 (May 2, 2017); *Petition of the City of Burlington, Vermont, d/b/a Burlington Telecom, for Designation As an Eligible Telecommunications Carrier in the State of Vermont for the Purpose of Offering Lifeline Serv. to Eligible Low-Income Households*, Vermont Public Service Board, Case No. 8883 (May 22, 2017); *Application of BlueBird Communications, LLC, for Designation as an Eligible Telecommunications Carrier*, Wisconsin Public Service Commission, 626-TI-100 (June 5, 2017); *Petition of Peoples Telecom, LLC for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Kentucky*, Kentucky Public Service Commission, Case No. 2017-00061 (June 9, 2017); *Application of Flat Wireless, LLC d/b/a Cleartalk Wireless for Designation as an Eligible Telecommunications Carrier (ETC) & Eligible Telecommunications Provider (ETP)*, Texas Public Utility Commission, Docket No. 46667 (June 12, 2017); *The Application of Assist Wireless, Inc., for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(2) of the Communications Act of 1934, as Amended*, Michigan Public Service Commission, Case No. U-18348 (July 31, 2017); *Application of Glob. Connection Inc. of An. d b/a Stand Up Wireless to be Designated as an Eligible Telecommunications Carrier in the State of Nevada Pursuant to NAC 704.680-461 & Section 254 of the Telecommunications Act of 1996*, Nevada Public Utilities Commission, Docket No. 17-05018 (Aug. 18, 2017); *Application of Cross Cable Television, LLC for Designation as an Eligible Telecommunications Carrier Pursuant to the Telecommunications Act of 1996*, Oklahoma Corporation Commission, Order No. 667619 (Aug. 30, 2017); *Application of Q Link Wireless LLC for Designation as an Eligible Telecommunications Carrier in the State of Arkansas*, Arkansas Public Service Commission, Order (Sept. 6, 2017).



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

September 15, 2017

The Honorable Diana DeGette  
U.S. House of Representatives  
2111 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman DeGette:

Thank you for your letter dated August 14, 2017. Since joining the Commission in May 2012, I have been a strong advocate for maintaining a vibrant and free over-the-air broadcast service in this country. Whether I have been pushing for the revitalization of AM radio or fighting to ensure that broadcast television stations were treated fairly in the incentive auction proceeding, my actions have been motivated by my belief that a strong over-the-air broadcast service advances the public interest. They have not been fueled by a desire to help any particular company.

Since I became Chairman in January 2017, it is certainly true that the FCC's general approach to issues impacting the broadcasting industry has changed. Under its prior leadership, the Commission was generally perceived as being hostile to broadcasters. I make no apologies for the fact that I have charted a different course. And I am pleased that the initiatives we have begun this year, from launching a proceeding to authorize use of the next-generation broadcast television standard to beginning a comprehensive effort to modernize the Commission's media regulations, have drawn support from a wide range of broadcasters associated with a wide variety of ideological perspectives.

I am also proud of the fact that under my leadership, the agency's independence has been restored. Under the prior Administration, for example, the Commission changed its proposed course in a major regulatory proceeding following the President's personal intervention. In this Administration, however, the Commission's decisions are being guided by the facts and the law, not by political pressure applied by the White House.

Below, I address more specifically the topics raised in your letter.

#### **Meetings/Correspondence**

Since November 8, 2016, I have met two times with President Trump. Each of these meetings has been publicly reported. On January 16, 2017, I met with then-President-Elect Trump at Trump Tower. This meeting was similar to a job interview, and the then-President-Elect did not express a view on any pending FCC proceedings. On March 6, 2017, I met with

President Trump at the White House. During this meeting, too, we did not discuss any pending FCC proceedings.

We did not discuss any issue pending at the FCC involving the Sinclair Broadcast Group at either meeting, and I do not recall the Sinclair Broadcast Group even being mentioned at either meeting. In terms of other White House officials in the current Administration, I do not recall having any discussions with any of them pertaining to the Sinclair Broadcast Group, and I am not aware of anyone in my office having such discussions.

Since November 8, 2016, I believe that I have met with representatives of the Sinclair Broadcast Group three times. On November 16, 2016, I spoke at a gathering of Sinclair station general managers that took place in Baltimore. This event was scheduled well before November 8. At this meeting, I gave a brief presentation regarding some of the issues confronting the FCC and then took questions on a wide variety of topics. I also had a brief lunch with some Sinclair executives. My Chief of Staff, Matthew Berry, accompanied me to this meeting. On January 6, 2017, I met with representatives of Sinclair during my visit to the Consumer Electronics Show. My Wireline Advisor, Nick Degani, accompanied me to this meeting. This was a social meeting, and I do not recall any FCC matters being discussed. And on January 19, 2017, I met with Sinclair representatives in Arlington, Virginia. Pending FCC proceedings were discussed during this meeting, and a summary of that meeting was filed with the Commission on January 23, 2017, and is publicly available through the FCC's website. My Chief of Staff accompanied me to this meeting.

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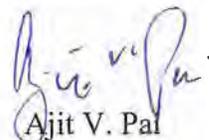
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

September 15, 2017

The Honorable Mike Doyle  
U.S. House of Representatives  
239 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

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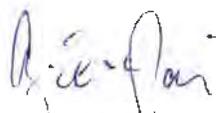
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
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September 15, 2017

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U.S. House of Representatives  
2322A Rayburn House Office Building  
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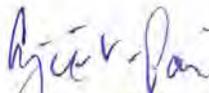
In addition, we note that Sinclair’s acquisition of the Bonten stations was unopposed at the Commission. Moreover, the time it took the Media Bureau to process the transaction was consistent with similar transactions in which there were no opposition filings or complex waiver requests. In fact, as you will see in the information we have provided in the lists of pending and completed television license transfer applications that you requested in your letter and that I am including with this response, assignment/transfer of control applications are frequently granted in similar or less time.

#### **Other Potential Proceedings**

On August 10, 2016, the Commission issued an order resolving the 2010 and 2014 broadcast ownership quadrennial review proceedings. Subsequently, several parties filed petitions for reconsideration of various aspects of this order, including the National Association of Broadcasters (NAB), Nexstar Broadcasting, Inc., and Connoisseur Media, LLC. Both the television Joint Sales Agreement (JSA) attribution rule and the local television ownership rule—among others—have been raised in one or more of the petitions for reconsideration before the Commission, and the Commission is obligated to rule on those petitions at some point. With respect to altering the current radio JSA attribution rule, which has been in place since 2003, I have no plans to start a proceeding, nor has any party made such a request. With regard to issues involving the national television ownership cap, including whether the UHF discount should be eliminated, I have publicly stated that I intend to commence consideration of those issues through a Notice of Proposed Rulemaking by the end of the year.

Please let me know if I can be of further assistance.

Sincerely,



Ajit V. Pai

**GRANTED TRANSFER APPLICATIONS AS OF MARCH, 2014**

Primary App. No.	Accepted Date	Granted Date	Assignor/Transferor	Assignee/Transferee	Sharing Agreement	Financial Agreements
20131220ELW	23-Dec-13	14-Mar-14	SAGAMOREHILL BROADCASTING OF GEORGIA, LLC	SAGAMOREHILL OF COLUMBUS GA, LLC	N	N
20140205ABI	7-Feb-14	21-Mar-14	MOUNTAIN TV, L.L.C.	GRAY TELEVISION LICENSEE, LLC	N	N
20131113BRS	18-Nov-13	31-Mar-14	DUHAMEL BROADCASTING ENTERPRISES	NEW RUSHMORE RADIO, INC.	N	N
20140212AEB	14-Feb-14	2-May-14	WXON LICENSE, INC.	SCRIPPS MEDIA, INC.	N	N
20140212AEO	14-Feb-14	2-May-14	WKBW-TV LICENSE, INC.	SCRIPPS MEDIA, INC.	N	N
20131209XYP	10-Dec-13	15-May-14	KETCHIKAN TV, LLC	DENALI MEDIA JUNEAU, CORP.	N	N
20140331ALQ	2-Apr-14	15-May-14	NEUHOFF FAMILY LIMITED PARTNERSHIP	NEUHOFF MEDIA TWIN FALLS, LLC	N	N
20140131ARB	3-Feb-14	28-May-14	COMPASS COMMUNICATIONS OF IDAHO, INC.	ABRAHAM TELECASTING COMPANY, LLC	N	N
20140311ACJ	13-Mar-14	29-May-14	KEZI, INC.	OREGON TV LICENSE COMPANY LLC	N	N
20140311ACZ	13-Mar-14	29-May-14	SODA MOUNTAIN BROADCASTING, INC.	OREGON TV LICENSE COMPANY LLC	N	N
20140307ACD	10-Mar-14	30-May-14	CONCILIO MISION CRISTIANA FUENTE DE AGUA VIVA, INC.	WESTERN NEW LIFE, INC	N	N
20140320ACE	21-Mar-14	10-Jun-14	PABELLON EDUCATIONAL BROADCASTING, INC.	SENDA EDUCATIONAL BROADCASTING	N	N
20140422AAU	24-Apr-14	10-Jun-14	VIRGIN BLUE, INC.	LESEA BROADCASTING OF ST. CROIX, INC.	N	N
20131231ADQ	2-Jan-14	16-Jun-14	SANDER OPERATING CO. II LLC	KPHO BROADCASTING CORPORATION	N	Y(option)
20131231ADN	2-Jan-14	16-Jun-14	SANDER OPERATING CO. II LLC	SAGAMOREHILL OF PHOENIX LICENSES, LLC	Y(SSA)	Y(option)
20140515AFS	19-May-14	2-Jul-14	KBMT LICENSE COMPANY, LLC	KMOV-TV, INC.	N	N
20140515AFT	19-May-14	2-Jul-14	KCEN LICENSE COMPANY, LLC	KMOV-TV, INC.	N	N
20140515AFW	19-May-14	2-Jul-14	KIDY/KXVA LICENSE COMPANY, LLC	KMOV-TV, INC.	N	N
20140515AGF	19-May-14	2-Jul-14	KIII LICENSE COMPANY, LLC	KMOV-TV, INC.	N	N
20140515AGG	19-May-14	2-Jul-14	KYTX LICENSE COMPANY, LLC	KMOV-TV, INC.	N	N
20140515ACQ	19-May-14	15-Jul-14	CENTRAL OREGON CABLE ADVERTISING, LLC	TDS BROADCASTING LLC	N	N
20140320ADL	24-Mar-14	16-Jul-14	RGV EDUCATIONAL BROADCASTING, INC.	MBTV TEXAS VALLEY, LLC	N	N
20140423ABZ	25-Apr-14	16-Jul-14	FOX24 OF MACON LICENSE LLC	WGXA LICENSEE, LLC	N	N
20140616ACE	19-Jun-14	4-Aug-14	WWAZ LICENSE, LLC	CABALLERO ACQUISITION LLC	N	N
20140625AOV	27-Jun-14	13-Aug-14	HARRISBURG TELEVISION, INC.	WHTM ACQUISITION LLC	N	N
20140609ACS	11-Jun-14	21-Aug-14	KMYA, LLC	I SQUARE MEDIA, LLC	N	N
20140701AAZ	3-Jul-14	1-Oct-14	FOX TELEVISION STATIONS, INC.	KTVU, LLC	N	N
20140701ABV	3-Jul-14	1-Oct-14	KTVU, LLC	FOX TELEVISION STATIONS, INC.	N	N
20140516AAM	19-May-14	15-Oct-14	BEARTOOTH COMMUNICATIONS COMPANY	GRAY TELEVISION LICENSEE, LLC	N	N
20140603ACT	16-Jul-14	15-Oct-14	FRANKLIN & HOYNACKI COMMUNICATIONS, LLC	I SQUARE MEDIA, LLC	N	N
20140617ABM	19-Jun-14	20-Oct-14	GORMALLY BROADCASTING LICENSES, LLC	MEREDITH CORPORATION	N	N
20140605ADW	9-Jun-14	31-Oct-14	QUAD CITIES TELEVISION ACQUISITION LICENSING LLC	MARSHALL BROADCASTING GROUP, INC.	Y(JSA+SSA)	N
20141001CBC	2-Oct-14	20-Nov-14	FAMILY BROADCASTING GROUP, INC.	GRIFFIN LICENSING, L.L.C.	N	N
20140519AHJ	21-May-14	21-Nov-14	ROCKY MOUNTAIN BROADCASTING COMPANY	GRAY TELEVISION LICENSEE, LLC	N	N
20130503ABV	6-May-13	4-Dec-14	COMCORP OF ALEXANDRIA LICENSE CORP.	NEXSTAR BROADCASTING, INC.	N	N
20130503ABR	6-May-13	4-Dec-14	COMCORP OF BATON ROUGE LICENSE CORP.	NEXSTAR BROADCASTING, INC.	N	N
20130503ABY	6-May-13	4-Dec-14	COMCORP OF BRYAN LICENSE CORP.	NEXSTAR BROADCASTING, INC.	N	N
20130503ACA	6-May-13	4-Dec-14	COMCORP OF EL PASO LICENSE CORP.	NEXSTAR BROADCASTING, INC.	N	N
20130503ACH	6-May-13	4-Dec-14	COMCORP OF LOUISIANA LICENSE CORP.	NEXSTAR BROADCASTING, INC.	N	N
20130503ACM	6-May-13	4-Dec-14	COMCORP OF TEXAS LICENSE CORP.	NEXSTAR BROADCASTING, INC.	N	N
20130503ACM	6-May-13	4-Dec-14	COMCORP OF TEXAS LICENSE CORP.	NEXSTAR BROADCASTING, INC.	N	N
20130503ACP	6-May-13	4-Dec-14	COMCORP OF TYLER LICENSE CORP.	NEXSTAR BROADCASTING, INC.	N	N
20140605ADO	9-Jun-14	4-Dec-14	COMCORP OF TEXAS LICENSE CORP.	MARSHALL BROADCASTING GROUP, INC.	Y (JSA+SSA)	Y(guarantee)
20140605ADO	9-Jun-14	4-Dec-14	COMCORP OF TEXAS LICENSE CORP.	MARSHALL BROADCASTING GROUP, INC.	Y(JSA+SSA)	Y(guarantee)
20140804ADH	6-Aug-14	4-Dec-14	COMCORP OF INDIANA LICENSE CORP.	BAYOU CITY BROADCASTING EVANSVILLE, INC.	N	N
20140909ADL	12-Sep-14	4-Dec-14	EXCALIBUR GRAND JUNCTION LLC	JEFF CHANG AND GABRIELA GOMEZ	N	N
20140910ADE	12-Sep-14	4-Dec-14	CHARLESTON TELEVISION, LLC	HSH CHARLESTON (WCIV) LICENSEE, LLC	N	N
20140924ACS	25-Sep-14	4-Dec-14	TV ALABAMA, INC.	HSH BIRMINGHAM (WCFT) LICENSEE, LLC	N	N
20141001CIL	3-Oct-14	4-Dec-14	TV ALABAMA, INC.	HSH BIRMINGHAM (WCFT) LICENSEE, LLC	N	N
20140827ANO	29-Aug-14	17-Dec-14	LIN OF ALABAMA, LLC	MEREDITH CORPORATION	Y(SSA)	N
20140827ADC	29-Aug-14	17-Dec-14	WTGS TELEVISION, LLC	WTGS LICENSEE, LLC	Y(SSA)	N
20140827ANP	29-Aug-14	17-Dec-14	MEDIA GENERAL COMMUNICATIONS HOLDINGS, LLC	WJAR LICENSEE, LLC	Y(SSA)	N
20140827ANM	29-Aug-14	17-Dec-14	LIN OF WISCONSIN, LLC	WLUK LICENSEE, LLC	Y(SSA)	N

20140827ACP	29-Aug-14	17-Dec-14	MEDIA GENERAL COMMUNICATIONS HOLDINGS, LLC	WVTM HEARST TELEVISION INC.	Y(SSA)	N
20140827ACM	29-Aug-14	17-Dec-14	LIN LICENSE COMPANY, LLC	WJCL HEARST TELEVISION LLC	Y(SSA)	N
20140827ANL	29-Aug-14	17-Dec-14	LIN OF WISCONSIN, LLC	WCWF LICENSEE, LLC	Y(SSA)	N
20140827ANV	29-Aug-14	17-Dec-14	KXRM LICENSEE, LLC	LIN TELEVISION CORPORATION	Y(SSA)	N
20140827ANY	29-Aug-14	17-Dec-14	WTTA LICENSEE, LLC	LIN TELEVISION CORPORATION	Y(SSA)	N
20140829ABX	2-Sep-14	17-Dec-14	JOURNAL BROADCAST CORPORATION	JOURNAL/SCRIPPS DIVESTITURE TRUST	N	N
20140829ABY	2-Sep-14	17-Dec-14	JOURNAL BROADCAST CORPORATION	JOURNAL/SCRIPPS DIVESTITURE TRUST	N	N
20141028ABJ	30-Oct-14	17-Dec-14	PRIME CITIES BROADCASTING, INC.	LEGACY BROADCASTING, LLC	N	Y(option)
20141028ABJ	30-Oct-14	17-Dec-14	PRIME CITIES BROADCASTING, INC.	LEGACY BROADCASTING, LLC	N	Y(option)
20140922ADF	23-Sep-14	18-Dec-14	WTVA, INC.	MISSISSIPPI TV LICENSE COMPANY, LLC	Y(JSA)	N
20141009ACE	10-Oct-14	18-Dec-14	TUPELO BROADCASTING, INC.	COASTAL TELEVISION BROADCASTING COMPANY LLC	Y(JSA)	N
20141030ACN	31-Oct-14	19-Dec-14	SAGAMOREHILL OF PHOENIX LICENSES, LLC	NEXSTAR BROADCASTING, INC.	Y(SSA)	N
20141103AEQ	4-Nov-14	19-Dec-14	KCWI LICENSE, LLC	NEXSTAR BROADCASTING, INC.	N	N
20140103AKO	13-Jan-14	16-Jan-15	COWLES CALIFORNIA MEDIA COMPANY	VISTAWEST CALIFORNIA, LLC	N	N
20141125AVM	26-Nov-14	22-Jan-15	KLAS, LLC	NEXSTAR BROADCASTING, INC.	N	N
20150318AAH	19-Mar-15	27-Apr-15	NEUHOFF MEDIA TWIN FALLS, LLC	GRAY TELEVISION LICENSEE, LLC	N	N
20150331ARA	1-Apr-15	5-Jun-15	UNIVERSITY OF GEORGIA	MARQUEE BROADCASTING GEORGIA, INC.	N	N
20150407AAU	8-Apr-15	10-Jun-15	TRANS AMERICA BROADCASTING CORP.	APERIO COMMUNICATIONS, LLC	N	N
20150428AAT	29-Apr-15	17-Jun-15	NEPSK, INC.	GRAY TELEVISION LICENSEE, LLC	N	N
20150520AAM	20-May-15	29-Jun-15	ICA BROADCASTING I, LTD.	GRAY TELEVISION LICENSEE, LLC	N	N
20150520ACQ	21-May-15	7-Jul-15	BRYANT BROADCASTING, INC.	DOVE BROADCASTING, INC.	N	N
20150424ABD	27-Apr-15	10-Jul-15	FRANKLIN & HOYNACKI COMMUNICATIONS, LLC	B&C COMMUNICATIONS, LLC	N	N
20150521AAR	22-May-15	10-Jul-15	HEARST STATIONS INC.	KITV, INC.	N	N
20150319ABJ	1-Apr-15	13-Aug-15	ALPHA & OMEGA COMMUNICATIONS, LLC	SERESTAR COMMUNICATIONS CORPORATION	N	N
20150710ABE	13-Jul-15	26-Aug-15	GRAY TELEVISION LICENSEE, LLC	MONTANA STATE UNIVERSITY	N	N
20150707ABJ	8-Jul-15	29-Aug-15	GRAY TELEVISION LICENSEE, LLC	KRTV COMMUNICATIONS, LLC	N	N
20150514ABX	15-May-15	8-Sep-15	JOURNAL/SCRIPPS DIVESTITURE TRUST	KNIN LICENSE SUBSIDIARY, LLC	Y(SSA)	N
20140221ABR	24-Feb-14	15-Sep-15	WBNG LICENSE, INC.	QUINCY NEWSPAPERS, INC.	N	N
20140221ABO	24-Feb-14	15-Sep-15	CHANNEL 11 LICENSE, INC.	QUINCY NEWSPAPERS, INC.	N	N
20140221ABQ	24-Feb-14	15-Sep-15	WEEK-TV LICENSE, INC.	QUINCY NEWSPAPERS, INC.	Y(SSA+9-month JSA)	N
20140221ABN	24-Feb-14	15-Sep-15	KBJR LICENSE, INC.	QUINCY NEWSPAPERS, INC.	Y(SSA+9-month JSA)	N
20140221ABM	24-Feb-14	15-Sep-15	MALARA BROADCAST GROUP OF DULUTH LICENSEE LLC	SAGAMOREHILL OF DULUTH LICENSES, LLC	Y(9-month JSA)	N
20140221ABS	24-Feb-14	15-Sep-15	WISE-TV LICENSE, LLC	SAGAMOREHILL OF INDIANA LICENSES, LLC	Y(SSA+JSA)	N
20140221ABL	24-Feb-14	15-Sep-15	MALARA BROADCAST GROUP OF FORT WAYNE LICENSEE LLC	QUINCY NEWSPAPERS, INC.	Y(SSA)	N
20150723ABD	24-Jul-15	15-Oct-15	GOCOM MEDIA OF NORTHERN CALIFORNIA, LLC	CALIFORNIA TV LICENSE COMPANY, LLC	Y(JSA+SSA)	N
20150723ABH	24-Jul-15	15-Oct-15	K4 MEDIA HOLDINGS LLC	MAXAIR MEDIA, LLC	Y(JSA+SSA)	N
20150709ABS	13-Jul-15	16-Oct-15	COMPASS COMMUNICATIONS OF IDAHO, INC.	BUCKALEW MEDIA, INC.	N	N
20150202ACY	3-Feb-15	19-Oct-15	NEXSTAR BROADCASTING, INC.	HSH LANCASTER (WLYH) LICENSEE, LLC	Y(LMA)	N
20150902ACB	14-Sep-15	23-Oct-15	CEDAR RAPIDS TELEVISION COMPANY	GRAY TELEVISION LICENSEE, LLC	N	N
20150128AUL	30-Jan-15	30-Oct-15	SOUTHERN NEVADA COMMUNICATIONS COMPANY, LLC	CHANNEL 33, INC.	N	N
20150922ABI	23-Sep-15	6-Nov-15	RKM MEDIA, INC.	SYRACUSE BROADCASTING, INC.	Y(LMA)	N
20150710ABA	13-Jul-15	10-Nov-15	COTTONWOOD COMMUNICATIONS PORTLAND, LLC	IRONWOOD COMMUNICATIONS PORTLAND, LLC	N	N
20150807ABO	10-Aug-15	10-Nov-15	HOAK MEDIA OF WICHITA FALLS LICENSE, LLC	KAUZ LICENSE SUBSIDIARY, LLC	N	N
20150807ABD	11-Aug-15	10-Nov-15	MIDESSA BROADCASTING LIMITED PARTNERSHIP	KFDA/KEYU LICENSE SUBSIDIARY, LLC	N	N
20150807ABM	11-Aug-15	10-Nov-15	KSWO TELEVISION COMPANY, INC.	KSWO LICENSE SUBSIDIARY, LLC	Y(SSA)	N
20150807ABA	11-Aug-15	10-Nov-15	CENTEX TELEVISION, LLC	KXXV LICENSE SUBSIDIARY, LLC	N	N
20150807ABI	11-Aug-15	10-Nov-15	MIDESSA TELEVISION, LLC	KWES LICENSE SUBSIDIARY, LLC	N	N
20150807ABI	11-Aug-15	10-Nov-15	MIDESSA TELEVISION, LLC	KWES LICENSE SUBSIDIARY, LLC	N	N
20150807ABP	11-Aug-15	10-Nov-15	PANHANDLE TELECASTING, LLC	KFDA/KEYU LICENSE SUBSIDIARY, LLC	N	N
20151014ADS	15-Oct-15	14-Dec-15	AGAPE CHURCH, INC.	VICTORY TELEVISION NETWORK, INC.	N	N
20151014ADS	15-Oct-15	14-Dec-15	AGAPE CHURCH, INC.	VICTORY TELEVISION NETWORK, INC.	N	N
20151014ADS	15-Oct-15	14-Dec-15	AGAPE CHURCH, INC.	VICTORY TELEVISION NETWORK, INC.	N	N
20151023AKC	26-Oct-15	15-Dec-15	HIC BROADCAST, INC.	NRI TV DFW LICENSE CO., LLC.	N	N
20151013AHF	14-Oct-15	28-Dec-15	HIGH MAINTENANCE BROADCASTING, LLC	KUQI LICENSEE, LLC	N	N
20150810ADK	11-Aug-15	29-Dec-15	INTERNATIONAL BROADCASTING CORPORATION	SPANISH BROADCASTING SYSTEM HOLDING COMPANY, INC.	N	N
20150810ADK	11-Aug-15	29-Dec-15	INTERNATIONAL BROADCASTING CORPORATION	SPANISH BROADCASTING SYSTEM HOLDING COMPANY, INC.	N	N

20151002ABX	5-Oct-15	27-Jan-16	REITEN TELEVISION, INC.	NEXSTAR BROADCASTING, INC.	N	N
20151014ADY	16-Oct-15	29-Jan-16	KNOXVILLE TV LLC	GRAY TELEVISION LICENSEE, LLC	N	N
20151014AEC	15-Oct-15	3-Feb-16	GRAY TELEVISION LICENSEE, LLC	KNOXVILLE TV LLC	N	N
20151008ACB	13-Oct-15	8-Feb-16	WLUC LICENSEE, LLC	GRAY TELEVISION LICENSEE, LLC	N	N
20150917ACT	18-Sep-15	12-Feb-16	KY3, INC.	GRAY TELEVISION LICENSEE, LLC	N	N
20150917ADD	18-Sep-15	12-Feb-16	RUSHMORE MEDIA COMPANY, INC.	GRAY TELEVISION LICENSEE, LLC	N	N
20150917ADQ	18-Sep-15	12-Feb-16	NORTHERN LIGHTS MEDIA, INC.	GRAY TELEVISION LICENSEE, LLC	N	N
20150917AEK	18-Sep-15	12-Feb-16	WDBJ TELEVISION, INC.	GRAY TELEVISION LICENSEE, LLC	N	N
20150917ADX	18-Sep-15	12-Feb-16	SUNFLOWER BROADCASTING, INC.	GRAY TELEVISION LICENSEE, LLC	N	N
20150917AEE	18-Sep-15	12-Feb-16	WAGT TELEVISION, INC.	GRAY TELEVISION LICENSEE, LLC	Y(temp. JSA + SSA)	N
20151008ACM	13-Oct-15	12-Feb-16	WSBT, INC.	WLUC LICENSEE, LLC	N	N
20151013AFS	16-Oct-15	12-Feb-16	RUSHMORE MEDIA COMPANY, INC.	LEGACY BROADCASTING OF RAPID CITY LLC	N	N
20151216ACH	17-Dec-15	12-Feb-16	PERKIN MEDIA, LLC	SCHURZ COMMUNICATIONS, INC.	N	N
20151207AKZ	9-Dec-15	19-Feb-16	H3 COMMUNICATIONS, LLC	JOHN WAGNER	N	N
20151207AKN	9-Dec-15	19-Feb-16	COMMONWEALTH BROADCASTING GROUP, INC.	CALA BROADCAST PARTNERS LLC	N	N
20160106AAJ	7-Jan-16	24-Feb-16	KDMI LICENSE, LLC	DOVE BROADCASTING, INC.	N	N
20131115BDM	20-Nov-13	26-Feb-16	CHANNEL 61 ASSOCIATES, LLC.	CROSS HILL COMMUNICATIONS, LLC	N	N
20160108ABR	11-Jan-16	11-Mar-16	PAPPAS TELECASTING OF OPELIKA, L.P.	CNZ COMMUNICATIONS SE, LLC	N	N
20151103BCF	5-Nov-15	4-Apr-16	PAPPAS TELECASTING OF CENTRAL NEBRASKA, L.P.	KHGI LICENSEE, LLC	N	N
20151103BCK	5-Nov-15	4-Apr-16	LINCOLN BROADCASTING, LLC	KHGI LICENSEE, LLC	N	N
20150113AAH	14-Jan-15	13-Apr-16	GEORGE S. FLINN, III	JSD PROPERTIES, LLC	N	N
20160317ABE	18-Mar-16	24-May-16	NATIONAL COMMUNICATIONS, L.L.C.	KVHP LICENSE SUBSIDIARY, LLC	Y(JSA+SSA)	N
20160407ABG	8-Apr-16	27-May-16	SOUTHWEST MEDIA, LLC	WEST AMERICAN FINANE CORPORATION	N	N
20160418ABZ	19-Apr-16	3-Jun-16	LARRY H. MILLER COMMUNICATIONS CORP.	KJZZ LICENSEE, LLC	N	N
20151009ADJ	13-Oct-15	17-Jun-16	FIREWEED COMMUNICATIONS LLC	GRAY TELEVISION LICENSEE, LLC	N	N
20151211AAT	14-Dec-15	2-Aug-16	WEST VIRGINIA MEDIA HOLDINGS, LLC	NEXSTAR BROADCASTING, INC.	N	N
20161110ACF	14-Nov-16	9-Jan-17	CHENA BROADCASTING LLC	GRAY TELEVISION LICENSEE, LLC	N	N
20160211AAB	11-Feb-16	11-Jan-17	LIN TELEVISION CORPORATION	NEXSTAR BROADCASTING, INC.	N	N
20160517AAD	18-May-16	11-Jan-17	NEXSTAR BROADCASTING, INC.	MARQUEE BROADCASTING COLORADO, INC.	N	N
20160603AAJ	6-Jun-16	11-Jan-17	NEXSTAR BROADCASTING, INC.	BCBL LICENSE SUBSIDIARY, LLC	Y(6-month SSA)	N
20160610ABG	13-Jun-16	11-Jan-17	YOUNG BROADCASTING OF GREEN BAY, INC.	GRAY TELEVISION LICENSEE, LLC	Y(6-month SSA)	N
20160610ABI	13-Jun-16	11-Jan-17	YOUNG BROADCASTING OF DAVENPORT, INC.	GRAY TELEVISION LICENSEE, LLC	Y(6-month SSA)	N
20160615AAY	16-Jun-16	11-Jan-17	MEDIA GENERAL COMMUNICATIONS HOLDINGS, LLC	GRAHAM MEDIA GROUP, VIRGINIA, LLC	Y(6-month SSA)	N
20160615AAV	17-Jun-16	11-Jan-17	NEXSTAR BROADCASTING, INC.	GRAHAM MEDIA GROUP, FLORIDA. INC.	Y(6-month SSA)	N
20160617ABH	20-Jun-16	11-Jan-17	INDIANA BROADCASTING, LLC	TERRE HAUTE TV LICENSE COMPANY, LLC	Y(6-month SSA)	N
20160617AAX	20-Jun-16	11-Jan-17	PRIMELAND LLC	LAFAYETTE TV LICENSE COMPANY, LLC	Y(6-month SSA)	N
20160617AAY	20-Jun-16	11-Jan-17	LIN LICENSE COMPANY, LLC	ROCHESTER TV LICENSE COMPANY, LLC	Y(6-month SSA)	N
20160617AAW	20-Jun-16	11-Jan-17	NEXSTAR BROADCASTING, INC.	FT. WAYNE TV LICENSE COMPANY, LLC	Y(6-month SSA)	N
20160617AAU	20-Jun-16	11-Jan-17	NEXSTAR BROADCASTING, INC.	ST. JOSEPH TV LICENSE COMPANY, LLC	Y(6-month SSA)	N
20160708ABF	11-Jul-16	11-Jan-17	LIN OF NEW MEXICO, LLC	RAMAR COMMUNICATIONS, INC.	N	N
20160421AFF	22-Apr-16	3-Mar-17	WWSB LICENSE LLC	WWSB LICENSE SUBSIDIARY, LLC	N	N
20160421AFG	22-Apr-16	3-Mar-17	WTXL-TV LICENSE LLC	WTXL LICENSE SUBSIDIARY, LLC	N	N
20160902AAY	6-Sep-16	3-Mar-17	WAAY-TV LICENSE LLC	ALABAMA TV LICENSE COMPANY, LLC	N	N
20170123GBE	24-Jan-17	8-Mar-17	BUCKALEW MEDIA, INC.	VENTURA TV VIDEO APPLIANCE CENTER INC.	N	N
20170221ACR	23-Feb-17	14-Apr-17	SUPERSTATION, INC.	MEREDITH CORPORATION	N	N
20170216AAT	17-Feb-17	18-Apr-17	COMMUNITY BROADCASTING SERVICE	GRAY TELEVISION LICENSEE, LLC	N	N
20170216AAV	17-Feb-17	18-Apr-17	DIVERSIFIED BROADCASTING, INC.	GRAY TELEVISION LICENSEE, LLC	N	N
20160518ABL	19-May-16	24-Apr-17	WITHERS BROADCASTING COMPANY OF WEST VIRGINIA	GRAY TELEVISION LICENSEE, LLC	N	N
20160518ABO	19-May-16	24-Apr-17	WITHERS BROADCASTING COMPANY OF CLARKSBURG, LLC	GRAY TELEVISION LICENSEE, LLC	N	N
20170307AAI	8-Mar-17	24-Apr-17	DOVE BROADCASTING, INC.	RADIANT LIFE MINISTRIES, INC.	N	N
20170307AAJ	8-Mar-17	24-Apr-17	DOVE BROADCASTING, INC.	RADIANT LIFE MINISTRIES, INC.	N	N
20170315AAE	16-Mar-17	3-May-17	CRANSTON ACQUISITION LLC	ENTRAVISION HOLDINGS, LLC	N	N
20160105ABB	7-Jan-16	15-May-17	PMCM TV LLC	MARANATHA BROADCASTING COMPANY, INC.	N	N
20170331ABO	3-Apr-17	15-May-17	LOUISIANA MEDIA COMPANY, LLC	WVUE LICENSE SUBSIDIARY, LLC	N	N
20170406AAS	7-Apr-17	23-May-17	MMK LICENSE LLC	MARQUEE BROADCASTING KENTUCKY, INC.	N	N
20160302ADZ	3-Mar-16	26-May-17	WDKA ACQUISITION CORPORATION	WDKA LICENSEE, LLC	N	N

20170201ADI	3-Feb-17	31-May-17	CASA EN DENVER, INC.	CHRISTIAN TELEVISION CORPORATION, INC.	N	N
20160108AAQ	11-Jan-16	21-Jun-17	I SQUARE MEDIA, LLC	LR TELECASTING, LLC	N	N
20131119BDP	20-Nov-13	23-Jun-17	CMCG PORTLAND LICENSE LLC	PORTLAND (WPFO-TV) LICENSEE, INC.	Y(JSA+SSA)	Y(Option)
20170517ABE	18-May-17	28-Jun-17	MT. MANSFIELD TELEVISION, INC.	GRAY TELEVISION LICENSEE, LLC	N	N
20170519AAV	22-May-17	30-Jun-17	SAGA QUAD STATES COMMUNICATIONS, LLC	QUEENB TELEVISION OF KANSAS/MISSOURI, LLC	N	N
20170519AAP	22-May-17	30-Jun-17	SAGA QUAD STATES COMMUNICATIONS, LLC	QUEENB TELEVISION OF TEXAS, LLC	Y(LMA)	N
20170519AAN	22-May-17	30-Jun-17	SURTSEY MEDIA, LLC	SAGAMOREHILL OF MISSOURI LICENSES, LLC	Y(JSA+SSA)	Y(Option)
20170519AAO	22-May-17	30-Jun-17	SURTSEY MEDIA, LLC	SAGAMOREHILL OF VICTORIA LICENSES, LLC	Y(LMA)	N(Option)
20131220GUG	23-Dec-13	3-Apr-14	HOAK MEDIA, LLC	GRAY TELEVISION GROUP, INC.	N	N
20131220GSU	23-Dec-13	3-Apr-14	HOAK MEDIA, LLC	GRAY TELEVISION GROUP, INC.	N	N
20131220GPK	23-Dec-13	3-Apr-14	HOAK MEDIA, LLC	GRAY TELEVISION GROUP, INC.	N	N
20131220GRO	23-Dec-13	3-Apr-14	HOAK MEDIA, LLC	GRAY TELEVISION GROUP, INC.	N	N
20131226AAX	30-Dec-13	3-Apr-14	MISSION TV, LLC	GRAY TELEVISION GROUP, INC.	N	N
20131226AAQ	30-Dec-13	23-Apr-14	HOAK MEDIA, LLC	NEXSTAR BROADCASTING, INC.	N	N
20131226AAF	30-Dec-13	23-Apr-14	HOAK MEDIA, LLC	NEXSTAR BROADCASTING, INC.	N	N
20131231ACA	2-Jan-14	6-May-14	POWER TELEVISION INTERNATIONAL, LLC	MAX MEDIA IV LLC	N	N
20130513AAG	13-May-13	21-May-14	NORMA J. LITTICK	HENRY C. LITTICK	N	N
20140417AAX	21-Apr-14	27-Jun-14	GRAHAM HOLDINGS COMPANY	BERKSHIRE HATHAWAY INC.	N	N
20130809ACB	12-Aug-13	24-Jul-14	SHAREHOLDERS OF PERPETUAL CORPORATION	SINCLAIR TELEVISION GROUP, INC.	N	N
20130809ACC	12-Aug-13	24-Jul-14	SHAREHOLDERS OF PERPETUAL CORPORATION	SINCLAIR TELEVISION GROUP, INC.	N	N
20130809ABW	12-Aug-13	24-Jul-14	SHAREHOLDERS OF PERPETUAL CORPORATION	SINCLAIR TELEVISION GROUP, INC.	N	N
20130809ACD	12-Aug-13	24-Jul-14	SHAREHOLDERS OF PERPETUAL CORPORATION	SINCLAIR TELEVISION GROUP, INC.	N	N
20130809ACE	12-Aug-13	24-Jul-14	SHAREHOLDERS OF PERPETUAL CORPORATION	SINCLAIR TELEVISION GROUP, INC.	N	N
20130809ACG	12-Aug-13	24-Jul-14	SHAREHOLDERS OF PERPETUAL CORPORATION	SINCLAIR TELEVISION GROUP, INC.	N	N
20130809ACA	12-Aug-13	24-Jul-14	ALLHOLDCO, INC.	SINCLAIR TELEVISION GROUP, INC.	N	N
20140723AFJ	25-Jul-14	5-Sep-14	SJL HOLDINGS II, LLC	GRAY TELEVISION GROUP, INC.	N	N
20140723AFI	25-Jul-14	5-Sep-14	SJL HOLDINGS II, LLC	GRAY TELEVISION GROUP, INC.	N	N
20131120ADF	21-Nov-13	31-Oct-14	ESTATE OF MILTON GRANT (CABELL WILLIAMS, ADMIN. AD	NEXSTAR BROADCASTING, INC.	N	N
20131120ADN	21-Nov-13	31-Oct-14	ESTATE OF MILTON GRANT (CABELL WILLIAMS, ADMIN. AD	NEXSTAR BROADCASTING, INC.	N	N
20131120ADO	21-Nov-13	31-Oct-14	ESTATE OF MILTON GRANT (CABELL WILLIAMS, ADMIN. AD	NEXSTAR BROADCASTING, INC.	N	N
20131120ADQ	21-Nov-13	31-Oct-14	ESTATE OF MILTON GRANT (CABELL WILLIAMS, ADMIN. AD	NEXSTAR BROADCASTING, INC.	N	N
20131120ADT	21-Nov-13	31-Oct-14	ESTATE OF MILTON GRANT (CABELL WILLIAMS, ADMIN. AD	NEXSTAR BROADCASTING, INC.	N	N
20131120ADV	21-Nov-13	31-Oct-14	ESTATE OF MILTON GRANT (CABELL WILLIAMS, ADMIN. AD	NEXSTAR BROADCASTING, INC.	N	N
20140131ALI	3-Feb-14	31-Oct-14	SHAREHOLDERS OF HIGH MAINTENANCE BROADCASTING,	CORPUS 18, LLC	N	N
20140925ACK	26-Sep-14	4-Dec-14	PARKER BROADCASTING OF DAKOTA LICENSE, LLC	MAJOR MARKET BROADCASTING OF NORTH DAKOTA, INC.	N	N
20141001CHH	3-Oct-14	4-Dec-14	HOAK MEDIA, LLC	LEGACY BROADCASTING, LLC	N	N
20141001CHG	3-Oct-14	4-Dec-14	PARKER BROADCASTING, INC.	LEGACY BROADCASTING, LLC	N	N
20140509ACZ	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509ADG	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AER	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AHV	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AFB	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AJW	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AIE	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AJN	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AIG	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AIH	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509ADI	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AIJ	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AIK	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AIM	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140509AIO	12-May-14	17-Dec-14	SHAREHOLDERS OF LIN MEDIA LLC	POST-MERGER SHAREHOLDERS OF MEDIA GENERAL, INC.	N	N
20140815AAG	18-Aug-14	17-Dec-14	SHAREHOLDERS OF JOURNAL COMMUNICATIONS, INC.	THE E.W. SCRIPPS COMPANY	N	N
20140815AAI	19-Aug-14	17-Dec-14	SHAREHOLDERS OF JOURNAL COMMUNICATIONS, INC.	THE E.W. SCRIPPS COMPANY	Y(JSA)	N
20140114ACT	16-Jan-14	16-Dec-15	ANGEL ROMAN LOPEZ & RUTH ROMAN LOPEZ, COURT-APP	ANGEL O. ROMAN LOPEZ & RUTH E.ROMAN LOPEZ	N	N
20151124EBQ	27-Nov-15	22-Feb-16	DOMINION BROADCASTING, INC. (OLD BOARD)	DOMINION BROADCASTING, INC. (NEW BOARD)	N	N

20150529ACB	1-Jun-15	23-Feb-16	THE OLD OFFICERS & DIRECTORS	THE NEW OFFICERS & DIRECTORS	N	N
20160111ACN	12-Jan-16	26-Feb-16	PEDRO V. ROIG, RECEIVER	CARIBEVISION HOLDINGS, INC.	N	N
20160129ALT	2-Feb-16	21-Mar-16	JASON WOLFF	NBI HOLDINGS LLC	N	N
20160129AKX	2-Feb-16	21-Mar-16	JASON WOLFF	NBI HOLDINGS LLC	N	N
20160211ABR	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160211AAO	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AGR	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210ACI	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AGI	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AGE	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AHN	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AGX	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AHO	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	Y(JSA+SSA)	N
20160210ACJ	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	Y(SSA)	N
20160210AGT	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AGW	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210ABW	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AHG	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	Y(JSA+SSA)	N
20160211AAF	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AGF	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AHJ	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AHK	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AGC	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160211AAG	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AGH	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210ABT	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AFF	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	Y(JSA+SSA)	N
20160210AHH	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	Y(JSA+SSA)	N
20160210AGU	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AFE	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160211ABB	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AFO	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160211ABU	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AEO	11-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20160210AEV	12-Feb-16	11-Jan-17	SHAREHOLDERS OF MEDIA GENERAL, INC.	NEXSTAR MEDIA GROUP, INC.	N	N
20131226AAU	30-Dec-13	27-Feb-17	PARKER BROADCASTING, INC.	MISSION BROADCASTING, INC.	Y(LMA)	N
20170505ABL	8-May-17	30-Jun-17	BONTEN MEDIA GROUP LLC	SINCLAIR TELEVISION GROUP, INC.	N	N
20170505ACP	8-May-17	30-Jun-17	BONTEN MEDIA GROUP LLC	SINCLAIR TELEVISION GROUP, INC.	N	N
20170505AAR	8-May-17	30-Jun-17	DAVID L. BAILEY	CUNNINGHAM BROADCASTING CORPORATION	Y(SSA+JSA)	Y(option)
20170505AAW	8-May-17	30-Jun-17	DAVID L. BAILEY	CUNNINGHAM BROADCASTING CORPORATION	Y(SSA+JSA)	Y(option)
20170505AAY	8-May-17	30-Jun-17	DAVID L. BAILEY	CUNNINGHAM BROADCASTING CORPORATION	Y(SSA+JSA)	Y(option)

PENDING TRANSFER APPLICATIONS

Primary App. No	Accepted Date	Assignor/Transferor	Assignee/Transferee	Days Pending	Sharing Agreement	Financial Agreement
20150206ACS	10-Feb-15	MICHAEL ANDERSON, TRUSTEE, CAROLYN C. SMITH C	MICHAEL ANDERSON	941	N	Y (Option)
20150206ACR	10-Feb-15	MICHAEL ANDERSON, TRUSTEE, CAROLYN C. SMITH C	MICHAEL ANDERSON	941	N	Y (Option)
20150206ACP	10-Feb-15	MICHAEL ANDERSON, TRUSTEE, CAROLYN C. SMITH C	MICHAEL ANDERSON	941	N	Y (Option)
20150529ABZ	1-Jun-15	THE OLD OFFICERS & DIRECTORS	THE NEW OFFICERS & DIRECTORS	830	N	N
20170501ACG	3-May-17	GENERAL COMMUNICATION, INC.	GCI LIBERTY, INC.	128	N	N
20170501ABY	3-May-17	GENERAL COMMUNICATION, INC.	GCI LIBERTY, INC	128	N	N
20170614AAL	15-Jun-17	R & F BROADCASTING, INC.	ERI INTERNATIONAL CORPORATION	85	N	N
20170614AAQ	15-Jun-17	WBIN, INC.	UNIVISION LOCAL MEDIA INC.	85	N	N
20170626AED	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AEC	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AEB	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AEA	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626ADY	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626ADX	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AEE	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AEG	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AEH	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AEK	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AEL	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AFG	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AFH	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AFQ	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AFR	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AFX	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AFT	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AFU	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AFY	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AFZ	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGO	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGD	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGF	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGG	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGP	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGH	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGI	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGK	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGL	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGM	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGQ	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170626AGY	28-Jun-17	SHAREHOLDERS OF TRIBUNE MEDIA COMPANY	SINCLAIR BROADCAST GROUP, INC.	72	*	*
20170706AAN	7-Jul-17	LOCUSPOINT WMGM LICENSEE, LLC	UNIVISION LOCAL MEDIA, INC.	63	N	N
20170707AAI	10-Jul-17	BUDD BROADCASTING CO., INC.	GRAY TELEVISION LICENSEE, LLC	60	N	N
20170707AAM	10-Jul-17	CURRENT BOARD OF KALO TV, INC.	NEW BOARD OF KALO TV, INC.	60	N	N
20170712ACH	17-Jul-17	IDAHO INDEPENDENT TELEVISION, INC.	ION MEDIA LICENSE COMPANY, LLC	53	N	Y (Option)
20170713AAB	17-Jul-17	BROADCAST TRUST	ION MEDIA LICENSE COMPANY, LLC	53	N	N
20170725AAR	26-Jul-17	OTA BROADCASTING (PSP), LLC	ENTRAVISION HOLDINGS, LLC	44	N	N
20170731AFZ	1-Aug-17	WEST AMERICAN FINANCE CORP.	TV-49 INC.	38	N	N

\* Companies may provide additional information upon information request sent on September 14, 2017  
Information current as of August 16, 2017



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

October 25, 2017

The Honorable Anna G. Eshoo  
U.S. House of Representatives  
241 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Eshoo:

Thank you for your letter concerning the Commission's Notice of Proposed Rulemaking related to radiofrequency (RF) exposure limits. I appreciate your concern about the length of this proceeding, which involves complex scientific and engineering analysis as well as ongoing discussions and negotiations with expert agencies such as the Food and Drug Administration and the Occupational Safety and Health Administration.

When I became Chairman, I directed my staff to review all outstanding rulemakings and move ahead expeditiously where there were opportunities for closure, leading to a high volume of actions over the last nine months. We continue to focus on several unresolved matters remaining in the hopper, and I have asked our staff to work toward concluding this particular matter in a timely fashion.

Please be assured that in the meantime, our Enforcement Bureau will continue to investigate complaints and enforce the rules on the hooks related to rooftop antenna facilities. I also should note that while the FCC initiated an inquiry of the existing RF exposure limits, we did not propose changing the rules, and comments in this proceeding have been widely split concerning the need to amend current regulations. I expect that the FCC's Commissioners will thoroughly deliberate all issues before issuing a final rulemaking.

I appreciate your interest in this matter. Your views are important and a copy of your letter will be entered into the record of the proceeding. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ajit V. Pai".

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
TELEVISION

October 25, 2017

The Honorable Richard Blumenthal  
United States Senate  
706 Hart Senate Office Building  
Washington, D.C. 20510

Dear Congresswoman Fishoo:

Thank you for your letter concerning the Commission's Notice of Proposed Rulemaking related to radiofrequency (RF) exposure limits. I appreciate your concern about the length of this proceeding, which involves complex scientific and engineering analysis as well as ongoing discussions and negotiations with expert agencies such as the Food and Drug Administration and the Occupational Safety and Health Administration.

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Please be assured that in the meantime, our Enforcement Bureau will continue to investigate complaints and enforce the rules on the books related to rooftop antenna facilities. I also should note that while the FCC initiated an inquiry of the existing RF exposure limits, we did not propose changing the rules, and comments in this proceeding have been widely split concerning the need to amend current regulations. I expect that the FCC's Commissioners will thoroughly deliberate all issues before issuing a final rulemaking.

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Sincerely,

A handwritten signature in blue ink, appearing to read "Ajit V. Pai".

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

October 24, 2017

The Honorable Doris Matsui  
U.S. House of Representatives  
2311 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Matsui:

Thank you for your letter regarding your request for updates on the Commission's efforts to implement the National Verifier for Lifeline Eligibility.

As you know, the 2016 Lifeline Order established the National Verifier to be responsible for determining subscriber eligibility for the Lifeline program by connecting to state and federal databases. I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. Accordingly, the Commission and the Universal Service Administrative Company (USAC), the administrator of the universal service programs, including Lifeline, have spent considerable time and resources developing a system that is designed to interact with multiple federal and state resources to create a Lifeline Eligibility Database (LED). This database, along with the existing National Lifeline Accountability Database (NLAD), form the National Verifier.

Commission staff have been deeply involved in reviewing USAC's National Verifier development and implementation plans to ensure the National Verifier is implemented in a cost-effective manner that will create a more effective, efficient, and fiscally responsible program. Commission staff support the National Verifier project by overseeing the development of National Verifier processes to ensure compliance with the Lifeline rules and applicable laws; entering into data sharing agreements with existing data sources to enable the National Verifier to cost-effectively verify subscribers' eligibility; updating the Lifeline program's System of Records Notice, Paperwork Reduction Act approvals, Records Schedule, and Privacy Impact Assessment to incorporate the National Verifier; and reviewing procurements related to the National Verifier, when appropriate. Per your request, attached is an update prepared by USAC of key milestones accomplished in preparation for the launch of the National Verifier in the last quarter.

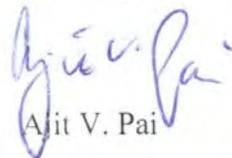
USAC and the FCC recently announced that upon its initial launch in December 2017, the National Verifier will verify eligibility for consumers in six states – New Mexico, Colorado, Utah, Mississippi, Wyoming, and Montana. The initial launch states currently include approximately 327,000 Lifeline subscribers. In order to meet the benchmark set in the 2016 Lifeline Order of launching in a minimum of 25 states or territories by December 2018, the National Verifier will need to be launched in at least 19 additional states/territories next year. USAC continues to work to identify states that will be ready to launch in 2018, evaluating in

Page 2—The Honorable Doris Matsui

particular the cost-effectiveness of building automated connections, as well as the technical readiness and willingness of the state to work with USAC. USAC is also continuing efforts to establish data sharing agreements with additional federal agencies. The National Verifier will be launched in all states and territories by December 2019. I am confident that the launch of the National Verifier will be a major step in rooting out waste, fraud, and abuse in the program, but where the Commission can improve processes even before the National Verifier is launched, it has a responsibility to do so.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Ajit V. Pai". The signature is fluid and cursive, with the first name "Ajit" and last name "Pai" being the most prominent parts.

Ajit V. Pai

Enclosure

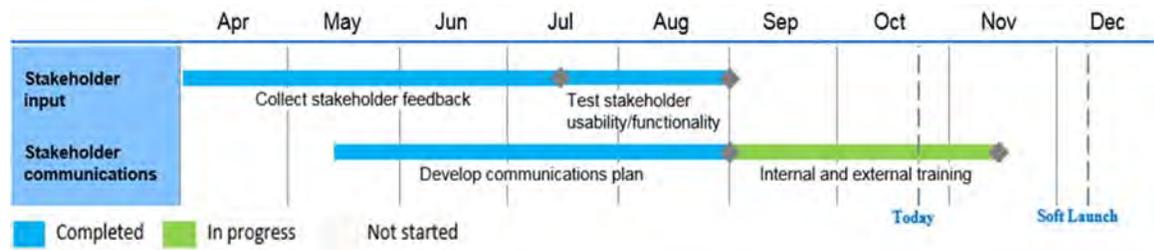
## National Verifier (NV) Project Update October 2017

### *Key Milestones*

The National Verifier project remains on track for its December 5th soft launch. On August 31st, USAC announced the six states that will be included in the initial launch. In addition, USAC has contracted with the Business Process Outsourcing (BPO) vendor, and stand-up of the operations are underway. Finally, outreach activities related to feedback and collection of input wrapped up in 3Q2017, and we are now pivoting in October to training on the finalized system and processes.

### *Program Outreach*

Activities associated with the collection of input from stakeholders, the development of communications and training materials, and the implementation of the training schedule, are on track as depicted in the timeline below.



In 3Q2017, the Lifeline team used the insights and recommendations from earlier feedback sessions to design elements of the National Verifier processes, tools, and forms. USAC then shared the proposed designs with stakeholders to validate that we understood their feedback correctly and had applied it successfully where appropriate. Throughout the process, some of the feedback was not incorporated into the final processes and designs, and USAC communicated with stakeholders where we were unable to implement their requests.

More specifically, to design the consumer and service provider online portals, USAC sought input from users on draft designs called wireframes and on draft process flows. USAC then tested working prototypes with the users to ensure the design and functionality met their needs and was easy to use. Throughout the process, USAC worked with the FCC to ensure buy-in on the designs and approach.

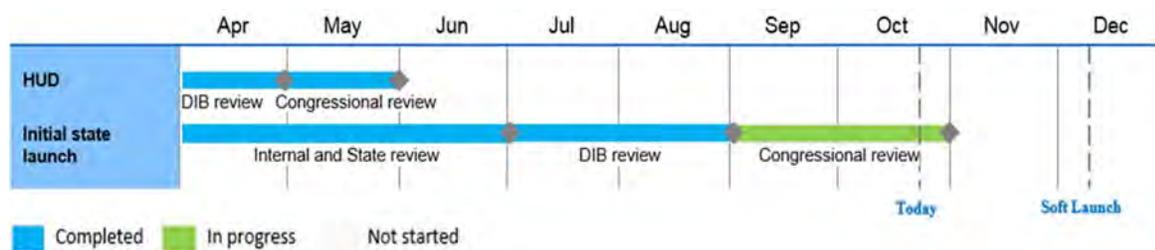
Before designing the Lifeline paper forms, USAC reviewed existing applications from a variety of states and service providers to gather best practices and understand common user needs. USAC also held calls with state partners, consumer advocates, and service providers, learning that most Lifeline forms are difficult for consumers to understand. USAC's goal was to create paper forms that met Lifeline's requirements and that would be accessible and understandable to Lifeline consumers. Using plain language and design best practices, USAC designed an application form, independent economic household worksheet, and recertification form. The forms were first validated and tested with the FCC, service providers, consumer advocates, and

state partners. After incorporating their feedback, USAC tested the forms with individual Lifeline consumers for further refinement.

With the processes, systems, and forms in their final design state, the Lifeline team has begun transitioning from build and design activities to training activities. To help stakeholders successfully use the National Verifier, USAC designed a training series that includes live training sessions via webinar, how to guides, updated web content and short videos. Beginning in early 4Q2017, the Lifeline team will roll out these trainings to internal and external system users.

### State & Federal Engagement

Activities associated with the development of computer matching agreements (CMA) with any available federal data sources and the initial states are on track as depicted in the timeline below.



On August 31, 2017, USAC announced that Colorado, Utah, Mississippi, New Mexico, Montana, and Wyoming will be in the initial National Verifier launch. USAC entered into CMAs with the first four states as well as the Department of Housing and Urban Development (HUD). The table below describes the Lifeline qualifying programs for which these CMAs will provide automated eligibility verification in each state. Where automated eligibility verification is not possible, the BPO will conduct review of consumer-submitted documentation.

State	Qualifying Programs with Automated Data Sources
<b>Colorado</b>	SNAP, Medicaid, Federal Public Housing
<b>Mississippi</b>	SNAP, Federal Public Housing
<b>Montana</b>	Federal Public Housing
<b>New Mexico</b>	SNAP, Medicaid, Federal Public Housing
<b>Utah</b>	SNAP, Medicaid, Federal Public Housing
<b>Wyoming</b>	Federal Public Housing

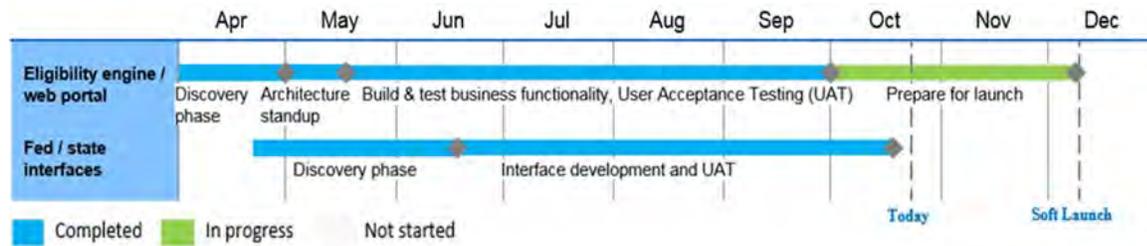
The CMA for HUD is fully completed, having received approvals from Congress and the Office of Management and Budget (OMB). The CMAs for the four states are approved by Congress and OMB and are currently within the 30-day public comment period in the Federal Register, which concludes in early November.

USAC and the FCC have begun working on the strategy for future launches of the National Verifier. In 2018, USAC will roll an additional 19 states into the National Verifier, supported by a combination of federal interfaces, state interfaces, and manual processes. USAC is continuing

to pursue CMAs with additional federal and state agencies, and expects to launch a next wave in 2Q2018.

### *Technical Build*

Activities associated with the technical build of the National Verifier System, including the eligibility engine and portal that will be used to interact with users, and the federal and state data interfaces to conduct the verification of eligibility, are on track as depicted in the timeline below.



During the soft launch period of December 5th through March 13th, service providers are able, but not required, to use the National Verifier to verify the eligibility of new consumer applicants. Because this is an optional period, consumers will be unable to apply directly to the National Verifier during the soft launch. This prevents the risk of a consumer applying through the National Verifier and then attempting to enroll with a service provider who has not yet converted to the National Verifier, causing confusion or re-work for the consumer.

To date, Accenture, the system integrator supporting the National Verifier, has completed five of eight technical milestones on time and with high quality in support of the December 5th launch. The remaining milestones include the soft launch milestone of December 5th, the hard launch milestone of March 13th, and the following 90-day warranty milestone.

Features completed in the most recent milestone include:

- Full end-to-end testing of the interfaces with HUD and all but one state.
- Fully tested functionality for the service provider portal, used to facilitate subscriber Lifeline application submission, eligibility verification, and enrollment in NLAD.

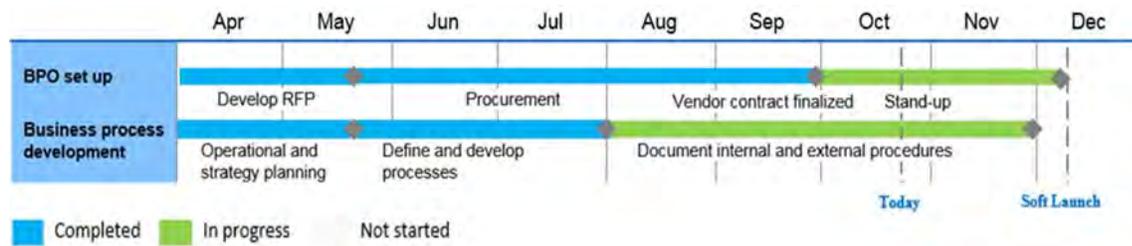
Features scheduled for the soft launch milestone include:

- Full functionality for BPO back end processes.
- Full end-to-end testing of the remaining state interfaces.
- Re-verification of existing subscribers in NLAD.

The hard launch milestone will include the final, fully tested consumer portal functionality, including that which is used to support annual recertification.

### *Operations*

Activities associated with procurement and stand up of the BPO and development of processes associated with the National Verifier framework are on track as depicted in the timeline below. We experienced a delay in the projected contract negotiation timeline with Conduent, however, we have worked with the vendor to mitigate the risk to the overall implementation of the BPO as discussed below.



USAC executed the contract with the BPO, Conduent, in early October 2017. This was later than originally anticipated in the project schedule. Throughout the contract negotiation, USAC and Conduent took steps to mitigate the impact of the schedule slippage. Where the original plan had included all BPO stand up activities to be completed by the soft launch of December 5th, USAC and Conduent worked to identify the must-have functions for December 5th, and created a later milestone for deferred features or processes to be completed by the hard launch of March 13th. These include activities associated with recertification, which will not kick-off for the BPO until March 2018, and select functionality within the interactive voice response (IVR) or customer service screens and queues that will be better informed after a few months of operations.

In addition to standing up the BPO, USAC has worked to develop internal processes to measure and monitor the impact of the National Verifier. These measures tie directly to the National Verifier objectives stated by the FCC in the Order. Below, we share a draft set of metrics that we intend to use to evaluate the framework in the categories of program integrity, user experience, and cost-effectiveness. In some cases, the same metric serves to measure success across multiple objectives. Because the National Verifier is an entirely new framework, USAC will initially baseline these metrics based on actual activity, and will then work to improve upon those baselines over time.

#### Program Integrity:

- Manual reviews versus automated eligibility verifications
  - Percentage of subscribers whose eligibility required manual verification – The goal is to minimize this result so that the majority of eligibility is based on automated, credible sources.
  - Percentage of manual eligibility verifications for programs with an available data source – The goal is to minimize this result so that we reduce the risk of fraudulent attempts to circumvent the automated checks.
  - Trend analysis of outliers by state, Eligible Telecommunications Carrier (ETC), and agent – This metric is a leading indicator that there is a broader problem, and further research into root causes is required.
- Quality Assurance Metrics

- Manual review error rate by BPO staff – The goal is to minimize errors by BPO employees that could result in either an ineligible subscriber receiving the benefit, or an eligible subscriber being denied.
- Applications flagged by BPO for potential fraud and outcome of analysis – This informational metric will tell us if the applications the BPO is flagging are the right ones for further research.

#### Cost Effectiveness:

- Manual reviews versus automated eligibility confirmations
  - Percentage of subscribers whose eligibility required manual verification – The goal is to minimize this result, as manual reviews are more expensive than automated reviews.
  - Percentage of manual eligibility verifications for programs with an available data source – The goal is to minimize this result, as we are investing in automated interfaces to avoid the cost of manual review.
- Variable Unit Volumes
  - Variance between monthly volume forecast and actual results – The goal is to minimize the variance, generally, to ensure we are effectively predicting and planning for costs.
  - Variance between budget and actual results – The goal is to remain at or below budget.
  - Measures of repeat contacts per subscriber (repeat customer service instances or instances of repeated attempts to apply for eligibility) – The goal is to minimize this result so that we do not incur unnecessary cost where an issue could be resolved on the first contact.

#### User Experience:

- Manual reviews versus automated eligibility confirmations
  - Percentage of subscribers whose eligibility required manual verification – The goal is to minimize this result to provide a faster and less burdensome verification experience to the consumer.
  - Average manual review time – The goal is to minimize this result for consumers requiring manual review.
- Average speed-to-answer (phone) – The goal is to minimize this result for a positive consumer experience.
- Customer satisfaction rates, where collected (online and phone) – The goal is to maximize positive consumer satisfaction reports.



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

October 23, 2017

The Honorable Mike Doyle  
Ranking Member  
Subcommittee on Communications and Technology  
Committee on Energy and Commerce  
U.S. House of Representatives  
2322A Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your letter concerning the radio programming broadcast on FM frequency 105.5 FM in the Washington, D.C. area, and for the opportunity to respond to your inquiry regarding potential foreign influence over the station's programming.

The station you reference is W288BS, an FM translator licensed to the community of Reston, Virginia. Your letter indicates that programming broadcast by that station is funded by the Russian government. As you know, Section 310(b)(4) of the Communications Act establishes a 25 percent benchmark for investment by foreign individuals, governments, and corporations in U.S.-organized entities that directly or indirectly control a U.S. broadcast radio station license. The *New York Times Magazine* article cited in your letter does not provide evidence, nor has the Commission otherwise been presented with any evidence, that the American licensee of W288BS is in violation of this statutory provision.

FM translator stations such as W288BS are authorized by the Commission's rules only to rebroadcast the transmissions of AM or FM broadcast stations or another FM translator. FM translator stations are required to notify the Commission of the call sign of the station being rebroadcast, which W288BS has done. Subject to this rebroadcast restriction, as is the situation with other broadcast licensees, the First Amendment and the Communications Act generally bar the Commission from interfering with a broadcast licensee's choice of programming, even if that programming may be objectionable to many listeners.

Answers to each of the specific questions raised in your letter are set forth below.

- (1) *Is the FCC currently investigating whether broadcast licensees are contravening the public interest by retransmitting radio programming funding (sic) by the Russian government in an effort to influence U.S. polices (sic) and elections?*

*Response:* No.

- (2) *If not, will the FCC commit to undertaking such an investigation?*

*Response:* If credible allegations of specific violations of the Communications Act or Commission rules are received, the Commission may initiate an investigation, as appropriate.

- (3) *If the allegations in the above described reports are true, will the FCC commit to enforcing the public interest standard on stations that broadcast Sputnik, in accordance with applicable law and regulations?*

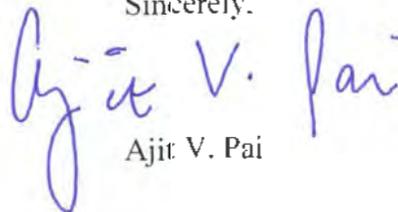
*Response:* As indicated above, the First Amendment and the Communications Act generally bar the Commission from interfering with a broadcast licensee's choice of programming. However, if the Commission receives credible allegations of specific violations of the Communications Act or Commission rules, we may initiate an investigation, if appropriate.

- (4) *If the FCC were to take action against a station being used to undermine our democracy, what specific steps could the FCC take?*

*Response:* Any sanctions that the Commission may impose are dependent on the facts of the particular matter and the extent of the Commission's statutory authority. The Commission's authority with respect to broadcast licensees generally includes the ability to issue monetary forfeitures and revoke broadcast authorizations.

I hope this information addresses your inquiry. Let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Ajit V. Pai". The signature is written in a cursive style with a large initial "A".

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

October 23, 2017

The Honorable Anna G. Eshoo  
U.S. House of Representatives  
241 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Eshoo:

Thank you for your letter concerning the radio programming broadcast on FM frequency 105.5 FM in the Washington, D.C. area, and for the opportunity to respond to your inquiry regarding potential foreign influence over the station's programming.

The station you reference is W288BS, an FM translator licensed to the community of Reston, Virginia. Your letter indicates that programming broadcast by that station is funded by the Russian government. As you know, Section 310(b)(4) of the Communications Act establishes a 25 percent benchmark for investment by foreign individuals, governments, and corporations in U.S.-organized entities that directly or indirectly control a U.S. broadcast radio station license. The *New York Times Magazine* article cited in your letter does not provide evidence, nor has the Commission otherwise been presented with any evidence, that the American licensee of W288BS is in violation of this statutory provision.

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Answers to each of the specific questions raised in your letter are set forth below.

- (1) *Is the FCC currently investigating whether broadcast licensees are contravening the public interest by retransmitting radio programming funding (sic) by the Russian government in an effort to influence U.S. politics (sic) and elections?*

*Response:* No.

- (2) *If not, will the FCC commit to undertaking such an investigation?*

*Response:* If credible allegations of specific violations of the Communications Act or Commission rules are received, the Commission may initiate an investigation, as appropriate.

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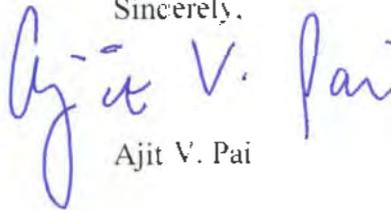
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*Response:* Any sanctions that the Commission may impose are dependent on the facts of the particular matter and the extent of the Commission's statutory authority. The Commission's authority with respect to broadcast licensees generally includes the ability to issue monetary forfeitures and revoke broadcast authorizations.

I hope this information addresses your inquiry. Let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

October 23, 2017

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
2322A Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Pallone:

Thank you for your letter concerning the radio programming broadcast on FM frequency 105.5 FM in the Washington, D.C. area, and for the opportunity to respond to your inquiry regarding potential foreign influence over the station's programming.

The station you reference is W288BS, an FM translator licensed to the community of Reston, Virginia. Your letter indicates that programming broadcast by that station is funded by the Russian government. As you know, Section 310(b)(4) of the Communications Act establishes a 25 percent benchmark for investment by foreign individuals, governments, and corporations in U.S.-organized entities that directly or indirectly control a U.S. broadcast radio station license. The *New York Times Magazine* article cited in your letter does not provide evidence, nor has the Commission otherwise been presented with any evidence, that the American licensee of W288BS is in violation of this statutory provision.

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Answers to each of the specific questions raised in your letter are set forth below.

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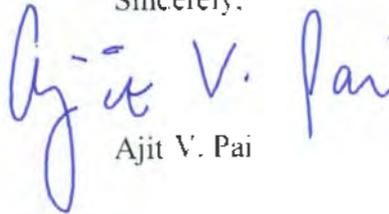
*Response:* As indicated above, the First Amendment and the Communications Act generally bar the Commission from interfering with a broadcast licensee's choice of programming. However, if the Commission receives credible allegations of specific violations of the Communications Act or Commission rules, we may initiate an investigation, if appropriate.

- (4) *If the FCC were to take action against a station being used to undermine our democracy, what specific steps could the FCC take?*

*Response:* Any sanctions that the Commission may impose are dependent on the facts of the particular matter and the extent of the Commission's statutory authority. The Commission's authority with respect to broadcast licensees generally includes the ability to issue monetary forfeitures and revoke broadcast authorizations.

I hope this information addresses your inquiry. Let me know if I can be of any further assistance.

Sincerely,



Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 21, 2017

The Honorable Diana DeGette  
Ranking Member  
Subcommittee on Oversight and Investigations  
Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman DeGette:

Thank you for your letter dated September 29, 2017. As I explained in my September 8 response to your previous letter, since joining the Federal Communications Commission in 2012, my actions to promote a vibrant and free over-the-air broadcast service have been motivated by my belief that a strong over-the-air broadcast service advances the public interest, not by a desire to help any particular company.

I provide below specific responses to your additional questions. Particularly, with respect to the UHF discount, the responses below make clear that the Commission's decision this year to reverse the prior Commission's party-line decision and reinstate the UHF discount pending a holistic review of the national ownership cap was consistent with my prior actions and statements on this issue dating back four years and was made well before I was aware of the pending transaction between Sinclair and Tribune.

**Correspondence:**

1. Please provide all correspondence between you or members of your office and representatives of Sinclair, including any lobbyists and lawyers representing Sinclair, since November 8, 2016.

*Response:* In addition to the correspondence that I provided in response to your previous letter, I am providing today additional correspondence from between November 8, 2016 and September 29, 2017, the date of your letter, that has been processed in connection with pending FOIA requests. With this response, the only correspondence of which I am aware between my office and representatives of Sinclair between November 8, 2016, and the date of your letter that you have not received are e-mails concerning a pending enforcement matter, which would not be appropriate for me to release at this time.

2. Have you or members of your office corresponded with representatives of Sinclair, including any lobbyists and lawyers representing Sinclair, since November 8, 2016, using a non-government email account? If so, please provide this correspondence.

*Response:* I have surveyed my staff, and we have only located one such e-mail, which was from Jerry Fritz on March 28, 2017. That email, regarding ATSC 3.0 chip development in India, was sent to my personal e-mail account and my Chief of Staff's official e-mail account. Consistent with FCC policy, my Chief of Staff forwarded this e-mail message to my official e-mail account one minute after it was received so that it would be made part of the Commission's records. I am providing this e-mail and the forwarded e-mail along with this letter.

3. Have you or members of your office corresponded with representatives of Sinclair, including any lobbyists and lawyers representing Sinclair, since November 8, 2016, using social media messaging services or other messaging applications, such as, but not limited to, Facebook messenger? If so, please provide this correspondence.

*Response:* I have surveyed my staff, and we have not located any such correspondence.

4. Please provide a copy of every FOIA request, both completed and pending, that relate specifically to Sinclair.

Attached is a chart that lists each FOIA request related specifically to Sinclair filed between June 2016 and the date of your letter, the person or entity that requested it, the submitted date and status.

### **Sinclair-Tribune Proposed Merger:**

1. When did you or your staff become aware of a possible transaction between Sinclair and Tribune?

*Response:* Although rumors of a potential transaction between Sinclair and Tribune surfaced in the press as early as March 2017, the Media Bureau staff, my staff, and I became aware of the specific pending transaction in May 2017, first from news outlets and then from the parties. *The New York Times* reported a possible deal on May 7, 2017, and on May 8, 2017, counsel for Sinclair called my office with the standard courtesy heads-up and sent the Media Bureau staff a press announcement. The applications were filed on June 26, 2017.

2. When did you direct the Media Bureau to begin drafting an order to reinstate the UHF discount?

*Response:* My office directed the Media Bureau to begin drafting an Order on Reconsideration to reinstate the UHF discount pending a holistic review of the national ownership cap in late January 2017, shortly after I was named Chairman of the Commission. This direction was consistent with my September 2016 dissent from the Report and Order that eliminated the discount without also analyzing the national ownership cap—a decision that was arbitrary and capricious. That direction was also consistent with the position that I took in 2013 when the Commission considered a Notice of Proposed Rulemaking regarding the UHF discount. And

that direction was reflected in the Commission's adoption on December 14 of a Notice of Proposed Rulemaking seeking public input on the scope of the Commission's authority both to adjust the cap and eliminate the UHF discount.

3. When did the Media Bureau begin to draft the September 14 Information Request letter to the applicants?

*Response:* The staff began considering issuing an information request within a couple of days after the applications were filed in late June. As part of the review process for any assignment of license or transfer of control application, the Media Bureau staff reviews the application and begins to determine what, if any, additional information will be needed in order to rule on the application. That review marks the beginning of the process by which the staff determines whether to request additional information from applicants.

4. Will the Media Bureau seek the additional information requested by interested parties in the July 12, 2017 Motion for Additional Information and Documents and Extension of Time?

*Response:* The Media Bureau issued an extensive Information Request on September 14, 2017. Some of the information requested was also the same as information sought by interested parties in their July 12, 2017 Motion. In response to the Bureau's September 14 Information Request, Sinclair provided more than 400 pages of documents on October 5, 2017. Staff is reviewing this response and will determine whether additional information is needed. In addition, the Media Bureau issued a Public Notice on October 18, 2017 inviting additional comments on this response. Such comments were due on or before November 2, 2017. Staff is reviewing the additional comments as well to determine whether additional information is needed from the applicants.

5. Will the Media Bureau pause the informal 180-day clock, as it has done in previous merger reviews, [footnote omitted] once the applicants respond to the information request in order for interested parties to have time to review and respond to the new information?

*Response:* On October 18, 2017, the Media Bureau released a Public Notice that stopped the clock for 15 days, until November 2, and stated that interested parties could submit additional comments in the proceeding to respond to the applicants' October 5 filing. *See Media Bureau Seeks Comment on Additional Submission in the Proceeding for Transfer of Control of Tribune Media Company to Sinclair Broadcast Group, Inc. and Pauses Informal 180-Day Transaction Shot Clock*, Public Notice, DA 17-1026 (MB Oct. 18, 2017).

#### **Processing Guidance on License Transfer Applications:**

1. Will you start a process for the full Commission's consideration on how the Media Bureau should review license transfer applications with sharing agreements or financial agreements?

Specifically, what is your plan to ensure that the Media Bureau has specific procedures to fully evaluate the impact of such transactions on the local markets and consumers? If you do not plan to put these specific procedures in place, please explain your reasons for not doing so.

*Response:* The Commission has rules and processes in place to ensure that proposed transactions, including those involving sharing or financial agreements, are thoroughly analyzed. I do not intend at this time to create a new process for review of such transactions. The Media Bureau has extensive experience in analyzing transactions involving sharing agreements and financial agreements.

**Other Potential Proceedings:**

1. Please provide a specific time frame for the Commission's consideration of revisions to the current TV Joint Sales Agreement attribution rule.

*Response:* The Commission voted on that issue at our November 16 meeting.

2. Please provide a specific time frame for the Commission's consideration of revisions to the current local TV ownership ("duopoly") rule.

*Response:* The Commission voted on that issue at our November 16 meeting.

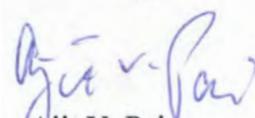
3. Please provide a specific time frame for the Commission's consideration of revisions to the current national TV ownership cap.

*Response:* As mentioned above, the Commission adopted a Notice of Proposed Rulemaking at our December 14 meeting to launch an examination of the current national television ownership cap, including the UHF discount.

4. Please provide a specific time frame for the Commission to start the next Quadrennial Review of Broadcast Ownership rules.

*Response:* Pursuant to Section 202(h) of the Telecommunications Act of 1996, as amended, the Commission must initiate a review of its broadcast ownership rules every four years. The last review was initiated in 2014 and consolidated into the ongoing 2010 review by my predecessor. Accordingly, the Commission will initiate the next review in 2018, consistent with its statutory obligation.

Sincerely,



Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 21, 2017

The Honorable Mike Doyle  
Ranking Member  
Subcommittee on Communications and Technology  
Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your letter dated September 29, 2017. As I explained in my September 8 response to your previous letter, since joining the Federal Communications Commission in 2012, my actions to promote a vibrant and free over-the-air broadcast service have been motivated by my belief that a strong over-the-air broadcast service advances the public interest, not by a desire to help any particular company.

I provide below specific responses to your additional questions. Particularly, with respect to the UHF discount, the responses below make clear that the Commission's decision this year to reverse the prior Commission's party-line decision and reinstate the UHF discount pending a holistic review of the national ownership cap was consistent with my prior actions and statements on this issue dating back four years and was made well before I was aware of the pending transaction between Sinclair and Tribune.

**Correspondence:**

1. Please provide all correspondence between you or members of your office and representatives of Sinclair, including any lobbyists and lawyers representing Sinclair, since November 8, 2016.

*Response:* In addition to the correspondence that I provided in response to your previous letter, I am providing today additional correspondence from between November 8, 2016 and September 29, 2017, the date of your letter, that has been processed in connection with pending FOIA requests. With this response, the only correspondence of which I am aware between my office and representatives of Sinclair between November 8, 2016, and the date of your letter that you have not received are e-mails concerning a pending enforcement matter, which would not be appropriate for me to release at this time.

2. Have you or members of your office corresponded with representatives of Sinclair, including any lobbyists and lawyers representing Sinclair, since November 8, 2016, using a non-government email account? If so, please provide this correspondence.

*Response:* I have surveyed my staff, and we have only located one such e-mail, which was from Jerry Fritz on March 28, 2017. That email, regarding ATSC 3.0 chip development in India, was sent to my personal e-mail account and my Chief of Staff's official e-mail account. Consistent with FCC policy, my Chief of Staff forwarded this e-mail message to my official e-mail account one minute after it was received so that it would be made part of the Commission's records. I am providing this e-mail and the forwarded e-mail along with this letter.

3. Have you or members of your office corresponded with representatives of Sinclair, including any lobbyists and lawyers representing Sinclair, since November 8, 2016, using social media messaging services or other messaging applications, such as, but not limited to, Facebook messenger? If so, please provide this correspondence.

*Response:* I have surveyed my staff, and we have not located any such correspondence.

4. Please provide a copy of every FOIA request, both completed and pending, that relate specifically to Sinclair.

Attached is a chart that lists each FOIA request related specifically to Sinclair filed between June 2016 and the date of your letter, the person or entity that requested it, the submitted date and status.

#### **Sinclair-Tribune Proposed Merger:**

1. When did you or your staff become aware of a possible transaction between Sinclair and Tribune?

*Response:* Although rumors of a potential transaction between Sinclair and Tribune surfaced in the press as early as March 2017, the Media Bureau staff, my staff, and I became aware of the specific pending transaction in May 2017, first from news outlets and then from the parties. *The New York Times* reported a possible deal on May 7, 2017, and on May 8, 2017, counsel for Sinclair called my office with the standard courtesy heads-up and sent the Media Bureau staff a press announcement. The applications were filed on June 26, 2017.

2. When did you direct the Media Bureau to begin drafting an order to reinstate the UHF discount?

*Response:* My office directed the Media Bureau to begin drafting an Order on Reconsideration to reinstate the UHF discount pending a holistic review of the national ownership cap in late January 2017, shortly after I was named Chairman of the Commission. This direction was consistent with my September 2016 dissent from the Report and Order that eliminated the discount without also analyzing the national ownership cap—a decision that was arbitrary and capricious. That direction was also consistent with the position that I took in 2013 when the Commission considered a Notice of Proposed Rulemaking regarding the UHF discount. And

that direction was reflected in the Commission's adoption on December 14 of a Notice of Proposed Rulemaking seeking public input on the scope of the Commission's authority both to adjust the cap and eliminate the UHF discount.

3. When did the Media Bureau begin to draft the September 14 Information Request letter to the applicants?

*Response:* The staff began considering issuing an information request within a couple of days after the applications were filed in late June. As part of the review process for any assignment of license or transfer of control application, the Media Bureau staff reviews the application and begins to determine what, if any, additional information will be needed in order to rule on the application. That review marks the beginning of the process by which the staff determines whether to request additional information from applicants.

4. Will the Media Bureau seek the additional information requested by interested parties in the July 12, 2017 Motion for Additional Information and Documents and Extension of Time?

*Response:* The Media Bureau issued an extensive Information Request on September 14, 2017. Some of the information requested was also the same as information sought by interested parties in their July 12, 2017 Motion. In response to the Bureau's September 14 Information Request, Sinclair provided more than 400 pages of documents on October 5, 2017. Staff is reviewing this response and will determine whether additional information is needed. In addition, the Media Bureau issued a Public Notice on October 18, 2017 inviting additional comments on this response. Such comments were due on or before November 2, 2017. Staff is reviewing the additional comments as well to determine whether additional information is needed from the applicants.

5. Will the Media Bureau pause the informal 180-day clock, as it has done in previous merger reviews, [footnote omitted] once the applicants respond to the information request in order for interested parties to have time to review and respond to the new information?

*Response:* On October 18, 2017, the Media Bureau released a Public Notice that stopped the clock for 15 days, until November 2, and stated that interested parties could submit additional comments in the proceeding to respond to the applicants' October 5 filing. *See Media Bureau Seeks Comment on Additional Submission in the Proceeding for Transfer of Control of Tribune Media Company to Sinclair Broadcast Group, Inc. and Pauses Informal 180-Day Transaction Shot Clock*, Public Notice, DA 17-1026 (MB Oct. 18, 2017).

**Processing Guidance on License Transfer Applications:**

1. Will you start a process for the full Commission's consideration on how the Media Bureau should review license transfer applications with sharing agreements or financial agreements?

Specifically, what is your plan to ensure that the Media Bureau has specific procedures to fully evaluate the impact of such transactions on the local markets and consumers? If you do not plan to put these specific procedures in place, please explain your reasons for not doing so.

*Response:* The Commission has rules and processes in place to ensure that proposed transactions, including those involving sharing or financial agreements, are thoroughly analyzed. I do not intend at this time to create a new process for review of such transactions. The Media Bureau has extensive experience in analyzing transactions involving sharing agreements and financial agreements.

**Other Potential Proceedings:**

1. Please provide a specific time frame for the Commission's consideration of revisions to the current TV Joint Sales Agreement attribution rule.

*Response:* The Commission voted on that issue at our November 16 meeting.

2. Please provide a specific time frame for the Commission's consideration of revisions to the current local TV ownership ("duopoly") rule.

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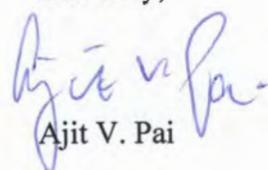
3. Please provide a specific time frame for the Commission's consideration of revisions to the current national TV ownership cap.

*Response:* As mentioned above, the Commission adopted a Notice of Proposed Rulemaking at our December 14 meeting to launch an examination of the current national television ownership cap, including the UHF discount.

4. Please provide a specific time frame for the Commission to start the next Quadrennial Review of Broadcast Ownership rules.

*Response:* Pursuant to Section 202(h) of the Telecommunications Act of 1996, as amended, the Commission must initiate a review of its broadcast ownership rules every four years. The last review was initiated in 2014 and consolidated into the ongoing 2010 review by my predecessor. Accordingly, the Commission will initiate the next review in 2018, consistent with its statutory obligation.

Sincerely,



Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 21, 2017

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Pallone:

Thank you for your letter dated September 29, 2017. As I explained in my September 8 response to your previous letter, since joining the Federal Communications Commission in 2012, my actions to promote a vibrant and free over-the-air broadcast service have been motivated by my belief that a strong over-the-air broadcast service advances the public interest, not by a desire to help any particular company.

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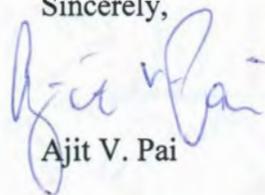
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Sincerely,



Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

October 24, 2017

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Pallone:

Thank you for your letter regarding the impact to communications from Hurricanes Harvey, Irma, and Maria. Communications services are vital to reaching help, supporting emergency response activities, and disseminating urgent information during hurricanes. The Commission takes its role promoting communications resilience extremely seriously. I agree that it is important to examine major disruptions after restoration efforts have concluded to apply that knowledge to future emergencies.

The Commission's immediate focus is on assisting with the restoration of communications services and networks in areas that have been devastated by this season's hurricanes. Commission staff have been working around the clock and over weekends on our response, and I am immensely proud of their efforts. For example, to date, the Commission has issued over 200 STAs and waivers to assist communications providers in Puerto Rico and the U.S. Virgin Islands. And we have made available up to \$77 million in advanced universal service funding to providers in Puerto Rico and the U.S. Virgin Islands that can be used to rebuild networks and restore service.

We are also assisting ongoing response efforts in support of the Department of Homeland Security and the Federal Emergency Management Agency, in accordance with the National Response and Recovery Frameworks. In the face of the unprecedented destruction wrought by Hurricane Maria, we are continuing to collect outage information through our Disaster Information Reporting System, analyze the information collected, and issue daily reports to both Federal government partners and the general public, in keeping with the Wireless Network Resiliency Cooperative Framework. In addition, Commission personnel are currently deployed in Puerto Rico in support of FEMA response and recovery efforts. I have visited communities affected by Hurricanes Harvey and Irma to speak with public safety officials and assess the damage, and I plan a similar visit related to Hurricane Maria in the near future. I have also spoken directly with senior executives at affected communications companies to stay apprised and offer the Commission's support.

Puerto Rico and the U.S. Virgin Islands were still recovering from Hurricane Irma when Hurricane Maria struck. The severity of the storms and the massive damage to infrastructure on the islands, including the near-total loss of commercial power, exacerbated widespread

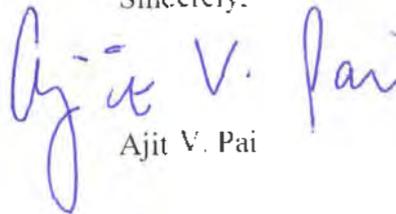
communications outages. Communications providers have faced challenges restoring service. Normal emergency response efforts, including damage assessment and near-term restoration, were severely hindered by the extensive storm debris blocking roads as well as the inability to expeditiously transport much-needed personnel and equipment into an island environment.

As restoration efforts from the hurricanes progress, the Commission is also planning for the transition to long-term recovery. We have established an internal Hurricane Recovery Task Force and are coordinating our planning efforts through the National Disaster Recovery Framework. At the same time, we are mindful that we are still in the midst of Atlantic hurricane season and looking at a persistent wildfire threat in the West.

Although it is premature to determine all our after-action steps at this time, the Public Safety and Homeland Security Bureau has already announced plans to issue a Public Notice seeking input from a broad range of stakeholders – including state and local officials, the 911 community, Federal response partners, industry, consumer groups, and the public – on what worked during the hurricanes in terms of communications continuity and restoration as well as areas for improvement. The Bureau plans to host a workshop to better understand the issues identified through this public process and develop options to address shortfalls and opportunities. As the ongoing response and recovery efforts continue, the Commission will consider what additional steps, including field hearings, might be taken to ensure communications networks are fully prepared for future disasters.

I appreciate your interest in this matter. Your views are very important as we move forward. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Ajit V. Pai". The signature is written in a cursive style with a large initial "A".

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 19, 2017

The Honorable Tony Cárdenas  
U.S. House of Representatives  
1510 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Cárdenas:

Thank you for your letter regarding the Media Ownership Reconsideration Order. In addressing the petitions for reconsideration of the FCC's 2016 Media Ownership Order, the Commission followed its normal process. Specifically, each petition for reconsideration was put out for public comment, and the Commission received comments supporting and opposing these petitions. As a result, any suggestion that the Commission's handling of these petitions was procedurally infirm is wholly without merit.

Turning to the merits of the Commission's decision to modify the Local Television Ownership Rule, the Reconsideration Order eliminated the requirement that at least eight independently owned television stations must remain in a market following the combination of two television stations in that market. As explained in the Reconsideration Order, this "eight-voices test" was not supported by any evidence in the record or economic literature. Moreover, eliminating this requirement will allow broadcasters, particularly in small and mid-sized markets, to realize the benefits of common ownership and better serve their local communities.

The Order also modified the prohibition against common ownership of two top-four rated stations in a local market. Specifically, it added an option for applicants to seek case-by-case review of a particular transaction in order to account for circumstances in which strict application of the Top-Four Prohibition may be unwarranted. This hybrid approach allows the Commission to ensure that application of the Top-Four prohibition is appropriate in a particular case and, importantly, does not relieve the Commission from its obligation to ensure that grant of an application proposing a top-four combination serves the public interest, convenience, and necessity pursuant to Section 310(d) of the Communications Act of 1934, as amended.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in black ink that reads "Ajit V. Pai". The signature is fluid and cursive, with the first name "Ajit" being the most prominent part.

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 19, 2017

The Honorable Yvette D. Clarke  
U.S. House of Representatives  
2058 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Clarke:

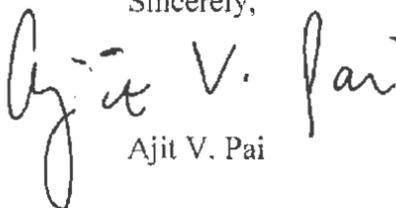
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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 19, 2017

The Honorable Diana DeGette  
U.S. House of Representatives  
2368 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman DeGette:

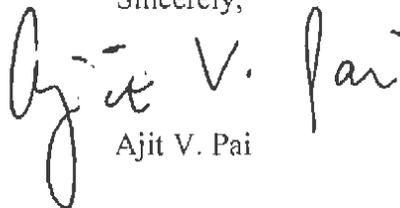
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

December 19, 2017

The Honorable Debbie Dingell  
U.S. House of Representatives  
116 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Dingell:

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OFFICE OF  
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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

December 19, 2017

The Honorable Mike Doyle  
U.S. House of Representatives  
239 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

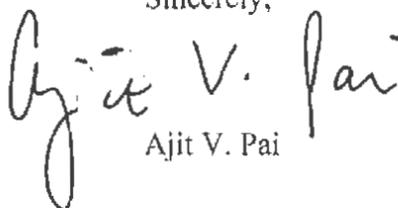
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
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December 19, 2017

The Honorable Eliot L. Engel  
U.S. House of Representatives  
2462 Rayburn House Office Building  
Washington, D.C. 20515

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I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in black ink that reads "Ajit V. Pai".

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

December 19, 2017

The Honorable Joseph P. Kennedy  
U.S. House of Representatives  
434 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Kennedy:

Thank you for your letter regarding the Media Ownership Reconsideration Order. In addressing the petitions for reconsideration of the FCC's 2016 Media Ownership Order, the Commission followed its normal process. Specifically, each petition for reconsideration was put out for public comment, and the Commission received comments supporting and opposing these petitions. As a result, any suggestion that the Commission's handling of these petitions was procedurally infirm is wholly without merit.

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Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

December 19, 2017

The Honorable Ben Ray Luján  
U.S. House of Representatives  
2231 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Luján:

Thank you for your letter regarding the Media Ownership Reconsideration Order. In addressing the petitions for reconsideration of the FCC's 2016 Media Ownership Order, the Commission followed its normal process. Specifically, each petition for reconsideration was put out for public comment, and the Commission received comments supporting and opposing these petitions. As a result, any suggestion that the Commission's handling of these petitions was procedurally infirm is wholly without merit.

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Sincerely,

A handwritten signature in black ink that reads "Ajit V. Pai". The signature is fluid and cursive, with the first name "Ajit" being the most prominent part.

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 19, 2017

The Honorable Jerry McNerney  
U.S. House of Representatives  
2265 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman McNerney:

Thank you for your letter regarding the Media Ownership Reconsideration Order. In addressing the petitions for reconsideration of the FCC's 2016 Media Ownership Order, the Commission followed its normal process. Specifically, each petition for reconsideration was put out for public comment, and the Commission received comments supporting and opposing these petitions. As a result, any suggestion that the Commission's handling of these petitions was procedurally infirm is wholly without merit.

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 19, 2017

The Honorable Bobby L. Rush  
U.S. House of Representatives  
2188 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Rush:

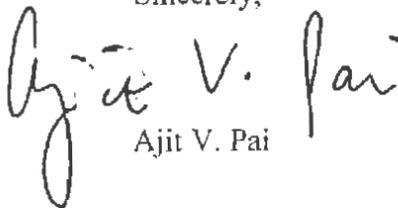
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Sincerely,

  
Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

December 19, 2017

The Honorable Jan Schakowsky  
U.S. House of Representatives  
2367 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Schakowsky:

Thank you for your letter regarding the Media Ownership Reconsideration Order. In addressing the petitions for reconsideration of the FCC's 2016 Media Ownership Order, the Commission followed its normal process. Specifically, each petition for reconsideration was put out for public comment, and the Commission received comments supporting and opposing these petitions. As a result, any suggestion that the Commission's handling of these petitions was procedurally infirm is wholly without merit.

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Sincerely,

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 19, 2017

The Honorable Paul Tonko  
U.S. House of Representatives  
2463 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Tonko:

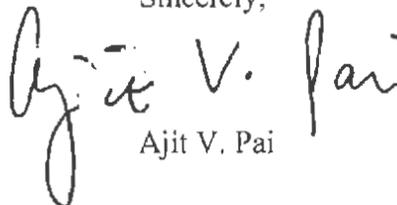
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Sincerely,

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

December 19, 2017

The Honorable Peter Welch  
U.S. House of Representatives  
2303 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Welch:

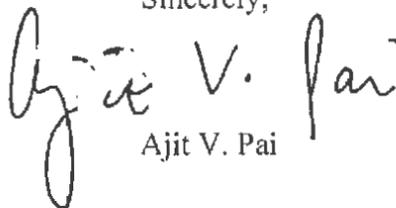
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

February 6, 2018

The Honorable Debbie Dingell  
U.S. House of Representatives  
116 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Dingell:

Thank you for your letter inquiring about the next generation broadcast television transmission standard, known as ATSC 3.0 or Next Gen TV, and the implications it will have on American consumers.

On November 16, 2017, the Commission adopted a *Report and Order* authorizing the voluntary deployment of ATSC 3.0 by broadcasters. As the world's first IP-based broadcast transmission platform, Next Gen TV is expected to bring a myriad of benefits to American consumers, including Ultra High Definition video and immersive audio, interactive educational programming, enhanced accessibility features, and advanced emergency alerting capabilities. Importantly, Next Gen TV will be wholly voluntary and market-driven. No broadcaster will be required to use the Next Gen TV standard. Further, since broadcasters deploying the Next Gen TV standard will be required to simulcast their programming using the current generation digital television (DTV) standard, consumers will not have to buy new television sets or converter equipment for their current television sets to receive free, over-the-air television programming.

Responses to your questions are provided below.

**Q1. You noted in response to my questions at a recent FCC Oversight Hearing before the House Committee on Communications and Technology that the Federal Trade Commission (FTC) will have a role in overseeing the privacy of ATSC 3.0 users. Has FCC staff coordinated with FTC staff to discuss these issues to ensure the FCC does not approve a technical standard that fails to adequately protect consumers' privacy or security?**

The Commission's approval of the technical standards for ATSC 3.0 did not raise novel privacy issues requiring coordination with the FTC. If Next Gen TV broadcasters fail to ensure that consumers' personal information is protected, the FTC has broad authority to enforce consumers' privacy rights. Section 5 of the FTC Act, which prohibits unfair and deceptive practices in the marketplace, gives the FTC the authority to take enforcement action against companies that fail to adhere to their stated privacy and security policies. Additionally, the FCC intends to closely monitor the transition to Next Gen TV.

**Q2. It is my understanding that there are several different business models for targeted advertisements under ATSC 3.0. One model includes building transmitters similar to cell towers around the DMA to do regional advertising. I understand this is a very capital intensive process with a high operating expense, but that it would not require the collection**

**of personal information from consumers. Is that correct? If no personal information from consumers is required, what standards will be applied to determine whether my constituents would choose to see targeted advertisements or not?**

Based on the specifications in the ATSC 3.0 technical standard, there are multiple ways in which an ATSC 3.0 broadcaster could provide geographically targeted advertising without collecting consumers' personal information. To provide geographically targeted ads, the broadcaster transmits multiple simultaneous advertisements, and the consumer's receiver determines which ad to display. One way multiple advertisements can be sent is through the use of Single Frequency Networks (SFNs), a technique that broadcasters use to transmit signals on the same frequency from multiple antennas in a local geographic area in order to improve coverage of the broadcast station. Geographically targeted advertising could also be enabled by the local collection by the receiver of a zip code or some other location information provided by the consumer during the set-up of the receiver. The receiver would never have to transmit that information back to the broadcaster or anyone else. Such geographically targeted advertising could allow a small regional business to advertise only to those viewers residing in its local geographic area, rather than to the entire television market. You are correct that such geographically targeted advertising would not require the centralized collection of personal information from consumers. There also is no need to enable consumers to opt in or opt out of such geographically relevant advertising.

**Q3. It is my understanding that a second business model for targeted advertisements involves delivery via the internet. In this scenario will the age, sex, address, and other demographic information be collected in order to deliver targeted advertising? Would consumers have to provide consent in order for their data to be collected? Could they choose not to provide their demographic information and not receive targeted advertisements but still receive the enhanced picture quality and public safety communications? If a consumer decides to provide their personal information, who is responsible for protecting it?**

Given that the Next Gen TV standard is new, it is not yet known which advanced or interactive features of Next Gen TV may require viewers to provide some personal information. Broadcasters have stated that there will be opt-in procedures for the collection of consumer information, analogous to the opt-in procedures for the collection of consumer information used by smartphone apps, and that the use of any information collected will be governed by user licensing agreements of the type that are common when consumers activate a smartphone app. If a consumer decides to provide his or her personal data, the broadcaster will be responsible for securing the data in accordance with its stated privacy and data security policies and will be subject to possible enforcement action by the FTC for failure to adhere to those policies.

**Q4. It is my understanding that another business model would use an encrypted signal, even for over-the-air television broadcasts that have traditionally been free. Would this require consumers to use some sort of encryption key to access the signal? Would such a key require a consumer to enter their age, address, gender, and other demographic information? If the free over-the-air signal is encrypted and needs demographic**

**information from a consumer to access it, do you still consider this service to be “free” in your opinion?**

In the *Report and Order*, the Commission notes that broadcasters have acknowledged that free Next Gen TV signals may be encrypted. However, the Commission explicitly stated in the *Order* that any ATSC 3.0 programming that is encrypted must not require special equipment supplied and programmed by the broadcaster to decode ATSC 3.0 signals. Broadcast stations deploying ATSC 3.0 will also be required to simulcast their programming in the current DTV standard, so viewers will still be able to access unencrypted free, over-the-air programming.

**Q5. There have been media reports that ATSC 3.0 would allow for better collection of audience data and would use this information as a sales tool for the advertisers, rather than relying on Nielsen or other measurement data. Will the new standards permit broadcasters to collect data on age, sex, income, address, or any other personal information? How will they be permitted to use this information? Will consumers be able to opt-out of having their data collected for this purpose?**

The FTC already has broad authority to enforce consumers’ privacy rights. As noted above in response to question 3, broadcasters have stated that personal data collected from ATSC 3.0 receivers will be anonymized so as not to identify individual viewers and that broadcasters will have access only to data on age, gender, and zip code, to the extent that viewers are willing to share such information. Additionally, any use of this information must be consistent with the particular entity’s privacy and data security policies, FTC oversight, and other safeguards. Broadcasters have also indicated that there will be opt-in procedures for the collection of consumer information, analogous to the opt-in procedures used by smartphone apps, and that the use of any information collected will be governed by user licensing agreements of the type that are common when consumers activate a smartphone app.

**Q6. It appears that new ATSC 3.0-capable TV sets could be susceptible to hacking, malware, and other potential computer viruses that could lead to predatory advertising instead of legitimate commercials. Is there anything contained in the proposal to address this potential problem?**

There is nothing in the record to suggest that ATSC 3.0-capable receivers will be susceptible to hacking, malware, or computer viruses that could lead to predatory advertising instead of legitimate commercials. Although Internet connectivity and the ability to transmit applications to TV receivers will be new capabilities to over-the-air broadcasting, these features are not new to television receiver manufacturers. Smart TVs with Internet connectivity and the ability to run applications that can download and display over-the-top media are common.

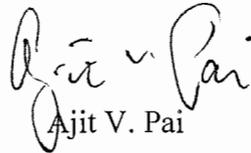
**Q7. How many TV sets are in the country today, and what will happen to them when ATSC 3.0 is deployed? How many TV sets will need to be replaced when broadcasters are not required to carry both the current ATSC 1.0 signal and the new ATSC 3.0 signal? What would you estimate the approximate cost to consumers to replace these sets?**

Although the Commission does not maintain data on the number of television sets in use in the United States, Nielsen data indicate that there are approximately 119.6 million U.S.

television households for the 2017-2018 television season and it is reasonable to assume that a substantial number of these households have multiple television sets. The voluntary deployment of Next Gen TV will not affect the ability of these television sets to receive free, over-the-air broadcast television signals. This is because broadcast stations deploying ATSC 3.0 will be required to simulcast their programming in the current DTV standard to ensure that viewers can continue to receive their existing broadcast service without having to purchase any new equipment. The Commission has not set an end date for the requirement that broadcast stations deploying ATSC 3.0 simulcast their programming in the current DTV (ATSC 1.0) standard. The Commission has stated that it will decide this issue in a future proceeding. In addition, the record suggests that it will be possible for consumers to easily upgrade their existing television sets to receive ATSC 3.0 transmissions by connecting converter equipment, such as an external tuner dongle, set-top box, or gateway device, to the HDMI ports on their television sets. Thus, most consumers that wish to view over-the-air television in ATSC 3.0 should be able to do so without purchasing new television sets.

I appreciate your interest in this matter. Please let me know if I can be of further assistance.

Sincerely,



Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

February 7, 2018

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Pallone:

Since my first day as Chairman, I've said repeatedly that my number one priority is closing the digital divide in order to bring the benefits of the Internet age to all Americans. To close that divide, we must work tirelessly to shut the door on waste, fraud, and abuse in the Universal Service Fund, for every dollar wasted is a dollar that can't support our mission of universal service. I remain firmly committed to this mission.

That's why I called for an investigation of the apparent abuses of the high-cost program by Sandwich Isles Communications Inc. more than a year before the prior Administration acted.<sup>1</sup> And that's why last December the Commission directed Blanca Telephone Company to return more than \$6.7 million in improperly paid high-cost support.

That's why under my watch the Commission has proposed forfeitures on two companies that apparently abused our rural healthcare program—depriving needy rural healthcare providers of millions of dollars. And why we've opened a proceeding to explore how to reduce waste in the Rural Healthcare Program.

That's why, when the Government Accountability Office (GAO) discovered rampant abuse of the Lifeline program—such as the enrollment of deceased individuals—I ordered immediate administrative reforms to correct the problem. And why, when the GAO reported that it could not confirm the eligibility of more than one-third of Lifeline subscribers sampled, the Commission proposed rules to curtail the abuse that has long plagued that program and to reform it to more effectively bridge the digital divide on behalf of low-income Americans. And it's why I worked with my colleagues to close out several *five-year-old* investigations of Lifeline resellers improperly seeking reimbursement for the same customer multiple times.

I continue to take the GAO's report of significant flaws in the Lifeline program seriously, and I look forward to its recommendations for improving the legacy rate-of-return high-cost

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<sup>1</sup> *Connect America Fund: ETC Annual Reports and Certifications*, WC Docket Nos. 10-90, 14-58, Public Notice, 30 FCC Red 11821, 11825 (2015) (Statement of Commissioner Ajit Pai) ("There's no question that the American people should not be expected to pay for the 'personal travel,' 'entertainment,' 'alcohol,' and 'personal expenses of . . . family members of employees and board members of telecommunications carriers.' The question is why the FCC has turned a blind eye to such conduct for so long.")

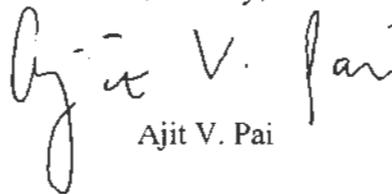
Page 2—The Honorable Frank Pallone

program. Moreover, last month, I asked my colleagues to crack down on ineligible expenses in the high-cost program. The draft order I circulated would adopt rules to ensure that high-cost funds cannot be used to pay for things not associated with the provision, maintenance, and upgrading of the facilities. It is my hope that in the near future all my colleagues will vote to support this measure.

In short: As a guardian of public funds, I take my responsibility to safeguard the integrity of the Universal Service Fund very seriously. I look forward to working with you and your staff on our shared goal to ensure the integrity of these programs meant to benefit all American consumers.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Ajit V. Pai". The signature is written in black ink and is positioned above the printed name.

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Raul Ruiz  
U.S. House of Representatives  
1319 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Ruiz:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

Suggestions that the changes in the *2017 Lifeline Reform Order* would cut off support to Tribal members living in urban areas are simply false. All eligible Americans who apply will continue to receive support, but that enhanced support will now be tailored to better target those in need. As detailed in the order, the Commission always intended the enhanced support to provide "additional incentives to serve Tribal lands that, due to their extreme geographic remoteness, are sparsely populated and have few businesses." However, about 98% of residents of urban areas—including Tulsa and Reno—already have access to fixed broadband Internet access service at speeds of 25 Mbps/3 Mbps. And these urban population centers are overwhelmingly populated by non-Tribal members. As recognized by former California State Public Utilities Commissioner Catherine Sandoval, "it is not reasonable to give the Enhanced Lifeline support where there is no additional cost to providing service to the eligible tribal customers." And so the Commission, as suggested by the Public Utility Division of the Oklahoma Corporation Commission, redirected our enhanced support to "synchronize the support with the most pressing deployment needs."

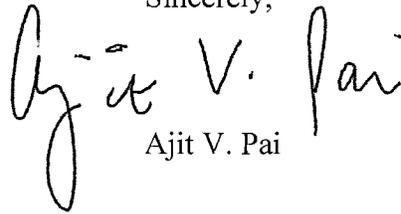
Similarly false are suggestions that the Commission did not consult with Tribes before adopting the *2017 Lifeline Reform Order*. The Commission sought comment on these changes in 2015, and Tribal commenters as diverse as the Navajo Nation, the Sovereign Councils of Hawaiian Homelands Assembly, Gila River Telecommunications, the Coeur D'Alene Tribe, the Affiliated Tribes of Northwest Indians, Mescalero Apache Telecommunications, the San Carlos Apache Telecommunications Utility, the Red Lake Band of Chippewa Indians, and the Alatna Village Council all commented in support of the Commission's proposals, and Commission staff consulted with Tribes in 2015 and 2016 on those proposals. In particular, the Commission's

decision to limited enhanced support to carriers reinvesting in Tribal communities received strong support from many Tribes and those that have built facilities on Tribal lands.

Finally, the *2017 Lifeline Reform Order* recognized that many Tribal residences have not been assigned conventional addresses and instead use descriptive addresses that are not recognized by the U.S. Postal Service. Accordingly, the order specifically found that “a Lifeline subscriber may provide a descriptive address when enrolling in the program.”

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jerry McNerney  
U.S. House of Representatives  
2265 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman McNerney:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

Suggestions that the changes in the *2017 Lifeline Reform Order* would cut off support to Tribal members living in urban areas are simply false. All eligible Americans who apply will continue to receive support, but that enhanced support will now be tailored to better target those in need. As detailed in the order, the Commission always intended the enhanced support to provide "additional incentives to serve Tribal lands that, due to their extreme geographic remoteness, are sparsely populated and have few businesses." However, about 98% of residents of urban areas—including Tulsa and Reno—already have access to fixed broadband Internet access service at speeds of 25 Mbps/3 Mbps. And these urban population centers are overwhelmingly populated by non-Tribal members. As recognized by former California State Public Utilities Commissioner Catherine Sandoval, "it is not reasonable to give the Enhanced Lifeline support where there is no additional cost to providing service to the eligible tribal customers." And so the Commission, as suggested by the Public Utility Division of the Oklahoma Corporation Commission, redirected our enhanced support to "synchronize the support with the most pressing deployment needs."

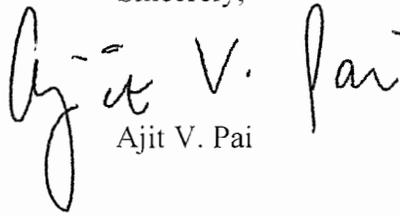
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decision to limited enhanced support to carriers reinvesting in Tribal communities received strong support from many Tribes and those that have built facilities on Tribal lands.

Finally, the *2017 Lifeline Reform Order* recognized that many Tribal residences have not been assigned conventional addresses and instead use descriptive addresses that are not recognized by the U.S. Postal Service. Accordingly, the order specifically found that “a Lifeline subscriber may provide a descriptive address when enrolling in the program.”

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jimmy Panetta  
U.S. House of Representatives  
228 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Panetta:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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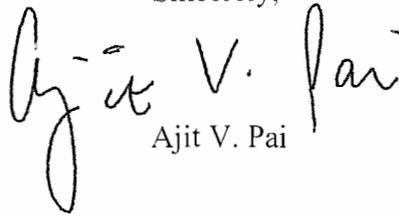
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Rosa DeLauro  
U.S. House of Representatives  
2413 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman DeLauro:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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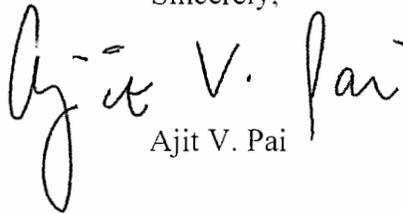
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Salud Carbajal  
U.S. House of Representatives  
212 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Carbajal:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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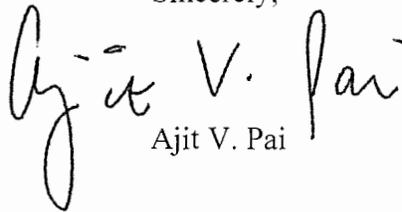
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Frank Pallone  
U.S. House of Representatives  
237 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Pallone:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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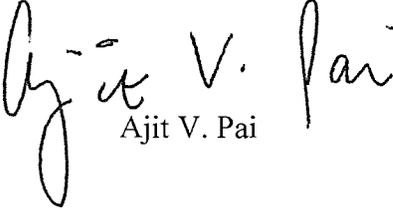
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Michael E. Capuano  
U.S. House of Representatives  
1414 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Capuano:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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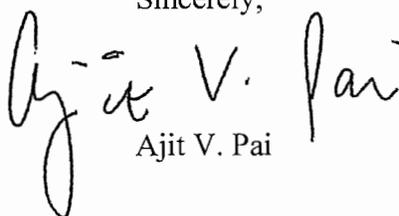
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Darren Soto  
U.S. House of Representatives  
1429 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Soto:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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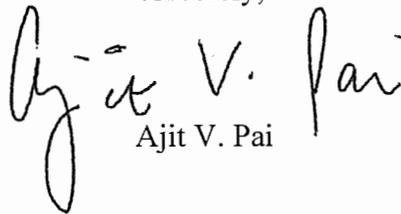
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Tom Suozzi  
U.S. House of Representatives  
226 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Suozzi:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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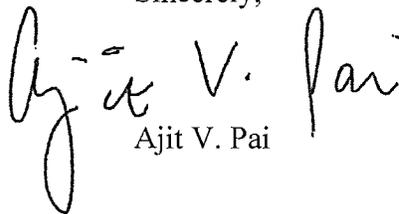
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Cedric L. Richmond  
U.S. House of Representatives  
420 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Richmond:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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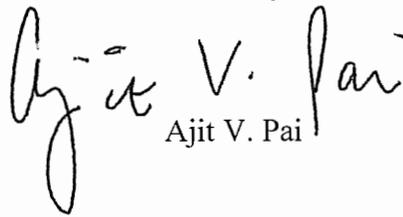
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Richard E. Neal  
U.S. House of Representatives  
341 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Neal:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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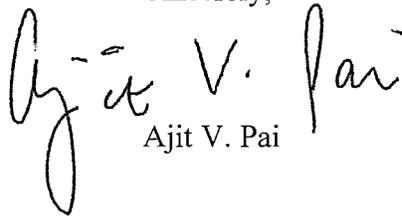
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I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Eddie Bernice Johnson  
U.S. House of Representatives  
2468 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Johnson:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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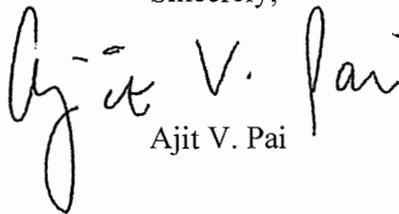
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Maxine Waters  
U.S. House of Representatives  
2221 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Waters:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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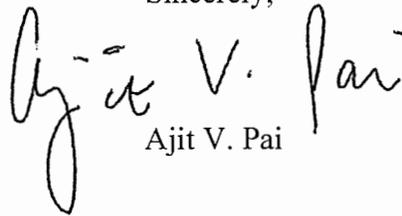
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Joyce Beatty  
U.S. House of Representatives  
133 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Beatty:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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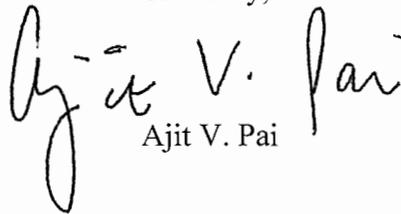
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Joaquin Castro  
U.S. House of Representatives  
1221 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Castro:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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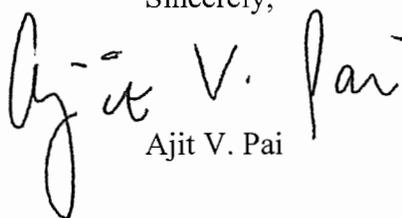
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Lucille Roybal-Allard  
U.S. House of Representatives  
2083 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Roybal-Allard:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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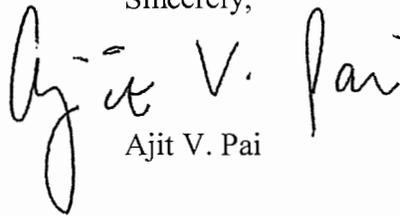
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Yvette D. Clarke  
U.S. House of Representatives  
2058 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Clarke:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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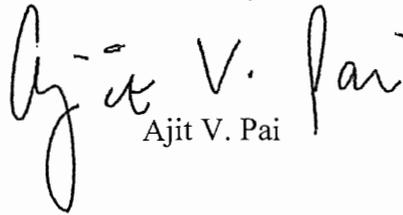
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Katherine M. Clark  
U.S. House of Representatives  
1415 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Clark:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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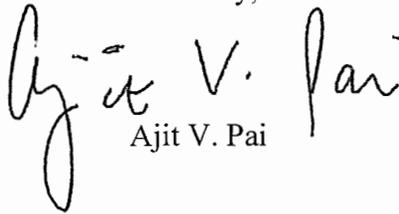
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jan Schakowsky  
U.S. House of Representatives  
2367 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Schakowsky:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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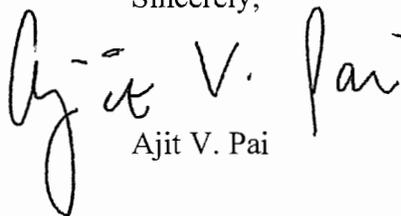
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Tony Cárdenas  
U.S. House of Representatives  
1510 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Cárdenas:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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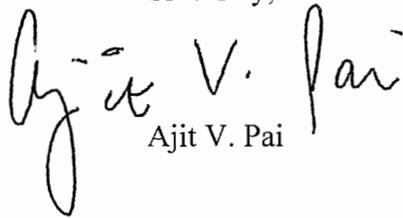
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Carolyn B. Maloney  
U.S. House of Representatives  
2308 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Maloney:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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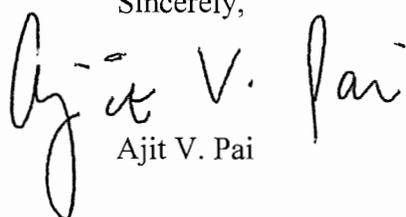
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Dan Kildee  
U.S. House of Representatives  
227 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Kildee:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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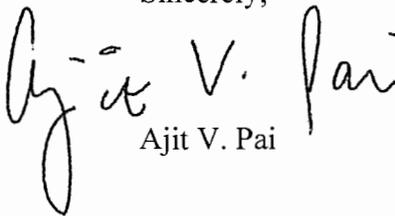
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Gwen Moore  
U.S. House of Representatives  
2252 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Moore:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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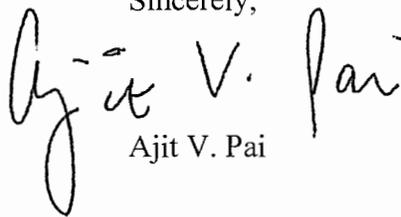
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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 1, 2018

The Honorable Debbie Dingell  
U.S. House of Representatives  
116 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Dingell:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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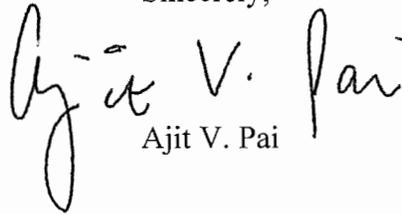
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Betty McCollum  
U.S. House of Representatives  
2256 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman McCollum:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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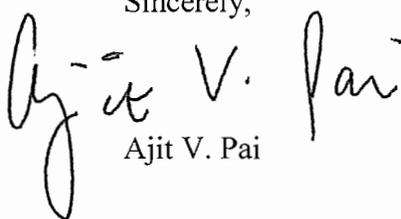
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Pete Aguilar  
U.S. House of Representatives  
1223 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Aguilar:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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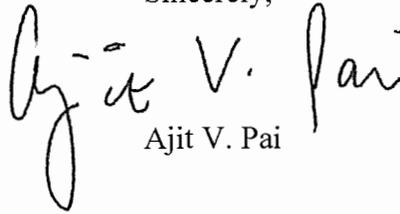
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Derek Kilmer  
U.S. House of Representatives  
1520 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Kilmer:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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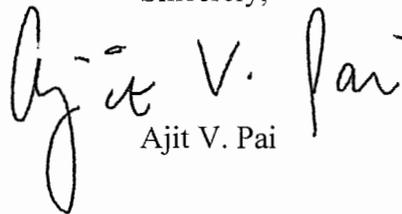
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Ben Ray Luján  
U.S. House of Representatives  
2231 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Luján:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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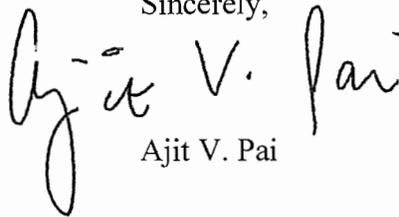
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Ruben Kihuen  
U.S. House of Representatives  
313 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Kihuen:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

Suggestions that the changes in the *2017 Lifeline Reform Order* would cut off support to Tribal members living in urban areas are simply false. All eligible Americans who apply will continue to receive support, but that enhanced support will now be tailored to better target those in need. As detailed in the order, the Commission always intended the enhanced support to provide "additional incentives to serve Tribal lands that, due to their extreme geographic remoteness, are sparsely populated and have few businesses." However, about 98% of residents of urban areas—including Tulsa and Reno—already have access to fixed broadband Internet access service at speeds of 25 Mbps/3 Mbps. And these urban population centers are overwhelmingly populated by non-Tribal members. As recognized by former California State Public Utilities Commissioner Catherine Sandoval, "it is not reasonable to give the Enhanced Lifeline support where there is no additional cost to providing service to the eligible tribal customers." And so the Commission, as suggested by the Public Utility Division of the Oklahoma Corporation Commission, redirected our enhanced support to "synchronize the support with the most pressing deployment needs."

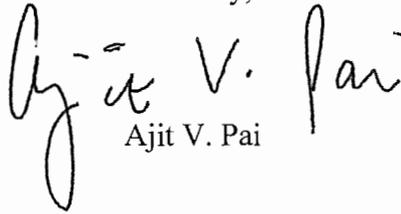
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decision to limited enhanced support to carriers reinvesting in Tribal communities received strong support from many Tribes and those that have built facilities on Tribal lands.

Finally, the *2017 Lifeline Reform Order* recognized that many Tribal residences have not been assigned conventional addresses and instead use descriptive addresses that are not recognized by the U.S. Postal Service. Accordingly, the order specifically found that “a Lifeline subscriber may provide a descriptive address when enrolling in the program.”

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable John Yarmuth  
U.S. House of Representatives  
131 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Yarmuth:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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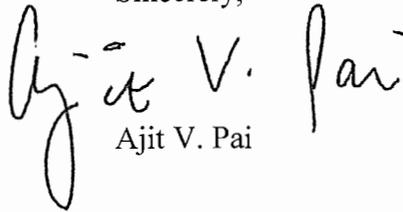
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Mike Doyle  
U.S. House of Representatives  
239 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your letter concerning the changes to Tribal Lifeline support in the *2017 Lifeline Reform Order*. Closing the digital divide is one of my top priorities. As Chairman, I have participated in three official Tribal consultations, made numerous visits to Tribal communities, and met with Tribal representatives, including the Navajo Nation. During these meetings and visits, I repeatedly heard that rural Tribal communities desperately need broadband investment. The Commission's recent changes to Tribal Lifeline support are designed to incentivize providers to deploy networks on rural Tribal lands and direct Tribal Lifeline support to areas where it is needed most, which in turn will improve the availability and affordability of advanced communications services in rural Tribal areas.

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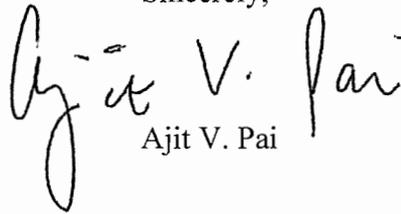
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

March 14, 2018

The Honorable Peter Welch  
U.S. House of Representatives  
2303 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Welch:

Thank you for your letter expressing concern about Commission action on Broadband Deployment Advisory Committee (BDAC) recommendations. I share your view that broadband is a vital resource for all Americans, and the FCC must do everything it can to speed the deployment of broadband in underserved parts of the country.

I've long said that every American who wants to participate in the digital economy should be able to do so. And the plain reality is that if you live in rural America, you are much less likely to have high-speed Internet access than if you live in a city. If you live in a low-income neighborhood, you are less likely to have high-speed Internet access than if you live in a wealthier area. To change that, we need massive investment to construct, expand, and improve wired and wireless networks. And to spur that investment, in turn, the FCC needs to remove outdated and unnecessary regulatory barriers.

I hope you agree with me that rural America has waited long enough. It's been eight years since the adoption of the National Broadband Plan, and too many millions of Americans are still awaiting its promise. That's why the Commission has moved forward over the last year to cut the redtape that has unnecessarily delayed the deployment of broadband throughout America. That's why at my first open meeting as FCC Chairman, I announced the establishment of the BDAC. The work of the BDAC is a crucial component of our efforts to close the digital divide for the many Americans that lack sufficient high-speed Internet access—and one we must consider to pursue vigorously.

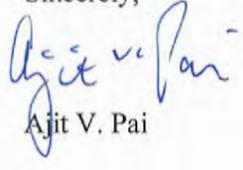
I have been so pleased with the progress of the BDAC over the course the year, resulting in a number of final recommendations in January—all approved by at least a super-majority of members, with many approved unanimously. I should note that approved recommendations, along with materials from the meetings and proposed recommendations, are posted on the Commission's website, and interested parties are welcome to provide input to the BDAC in the electronic docket established for that purpose, GN Docket No. 17-83. I look forward to hearing your views, and the views of those not serving on the BDAC, on these particular recommendations as the Commission continues its work to close the digital divide.

Finally, you note the need to ensure reasonably comparable service in rural America. I agree. That's one reason why the Commission maintained the 25 Mbps/3 Mbps benchmark for high-speed fixed broadband service and concluded that mobile broadband is not a full substitute

for fixed service. And that's why I asked my colleagues earlier this year to support my push for an additional \$500 million in universal service funding to help bridge the digital divide in areas served by small rural carriers and cooperatives.

I look forward to working with you and your staff as we pursue the common goal to extend digital opportunity to every American. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink that reads "Ajit V. Pai". The signature is fluid and cursive, with the first name "Ajit" and last name "Pai" clearly legible.

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 1, 2018

The Honorable Bobby L. Rush  
U.S. House of Representatives  
2188 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Rush:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

I agree with you that the National Lifeline Eligibility Verifier will be one important tool in eliminating this waste, fraud, and abuse. But it is not the only one, nor will it solve all the problems with the program. It simply isn't prudent to sit idly by when hundreds of millions of taxpayer dollars are at stake. That's why the Commission last year sought comment on a wide variety of measures to improve the administration of the Lifeline program—from re-empowering state commissions to police Lifeline carriers to partnering with states to stand up the National Verifier, from improving program audits to adopting a self-enforcing budget. The Lifeline program's goal is—or should be—to empower consumers, not companies. And that will be our lodestar as we move forward to ensure that unscrupulous companies stop abusing this important program.

Turning to the National Verifier itself, as you know, the *2016 Lifeline Reform Order* called for the Universal Service Administrative Company to design and establish a National Verifier, along with the accompanying information technology, in 2017. Despite the fact that Commission staff was able to negotiate information-sharing agreements with six states on time, I learned on November 30, 2017 that USAC's implementation of the National Verifier had failed key security checks. Accordingly, the Wireline Competition Bureau postponed the National Verifier's launch until USAC could fully test the system for compliance with the Federal

Information Security Management Act of 2002 (FISMA). Although I was disappointed to learn of this failing—and to learn of it at such a late hour—the Commission cannot ignore its duty to safeguard consumers’ personal information.

In response to your particular questions:

1. *Please provide a comprehensive list of proactive efforts you have taken as Chairman, if any, to ensure that the National Verifier is deployed on time in all U.S. states and territories.*

I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. In early 2017, I directed Commission staff to work collaboratively with USAC to ensure the timely establishment of the National Verifier. In May 2017, after the resignation of the Chief Executive Officer of USAC following the flawed roll-out of E-Rate’s information technology system, I made clear to Commission staff and the USAC Board that finding a replacement with IT expertise was a priority. On December 13, I approved the appointment of Radha Sekar—an experienced federal information-technology administrator—as Chief Executive Officer of USAC. I also then sought, and received, the unqualified support of USAC’s Board of Directors to strengthen its oversight of USAC’s information technology and security systems. Since then, the Commission’s IT staff have been working hand in hand with USAC’s to ensure that the National Verifier comes into full FISMA compliance.

I also directed staff to commence negotiations with several states to come to data-sharing agreements, to ensure that at least five states would be ready for the launch in December 2017. In August 2017, the FCC announced that the initial launch of the National Verifier would occur in six states—Colorado, Mississippi, Montana, New Mexico, Utah, and Wyoming. While we continue to pursue additional agreements, the Commission sought comment in the *2017 Lifeline Reform Order* on additional ways to encourage states to work cooperatively with the Commission and USAC to integrate their state databases into the National Verifier without unnecessary delay.

Finally, I have directed our staff to work with our federal partners to facilitate data-sharing agreements for federal programs that qualify consumers for Lifeline. My office worked directly with the U.S. Department of Housing and Urban Development to facilitate the first such arrangement, and Commission staff continue to pursue others.

2. *Please provide a comprehensive list of what proactive efforts FCC staff have taken, if any, to ensure that the National Verifier is deployed on time in all U.S. states and territories.*

Commission staff support the National Verifier project by overseeing the development of National Verifier processes to ensure compliance with the Lifeline rules and applicable laws; negotiating and entering into data-sharing agreements with existing data sources to enable the National Verifier to cost-effectively verify subscribers’ eligibility; updating the Lifeline program’s System of Records Notice, Paperwork Reduction Act approvals, Records Schedule, and Privacy Impact Assessment to incorporate the National Verifier; providing guidance to USAC as it develops processes for reverifying consumers as they

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3. *Please provide the Commission's strategic plan to ensure that the National Verifier is deployed on time going forward.*

Commission staff continues to work closely with USAC to ensure timely deployment of the National Verifier. The USAC Board is fully committed to strengthening oversight and delivery of timely, secure, and reliable systems for the administration of the Universal Service Fund. Additional details about plans going forward may be found in USAC's most recent National Verifier Plan submission, which is attached to this letter. The initial launch of the National Verifier will provide valuable lessons for USAC and the Commission, and we plan to use those insights to inform the continued rollout of the system.

4. *Please provide a list of dated benchmarks detailing when the Commission plans to meet legal, practical, or deployment related goals for fully implementing the National Verifier on time in all U.S. states and territories.*

This is the first time that USAC has developed a database on this scale (nationwide and including over 10 million program participants, based on current estimates) and with this level of personally identifying information. Creating the National Verifier involves establishing interfaces with multiple states and federal agencies by first negotiating data-sharing agreements and then creating the electronic interfaces. The process also involves development of a back-end system to manage the complexity of simultaneous calls to multiple interfaces to verify identity and eligibility, and the creation of interactive portals for use by service providers and consumers. USAC has procured vendors to handle certain key aspects of the National Verifier, which itself has taken time and added complexity to the process.

Unfortunately, original estimates of the time associated with the deployment of the National Verifier have not tracked with the actual time associated with this work. The Commission did not complete an assessment of potential challenges before adopting the *2016 Lifeline Reform Order*, so challenges unanticipated by the initial proposed timelines for deployment have arisen and delayed deployment. For example, one of the most significant challenges has involved addressing FISMA compliance. This process has been more time consuming than USAC originally anticipated and forecasted to the FCC, but it is an area of the utmost importance and one that must be fully addressed before deployment of the National Verifier can occur. Thus, while USAC and the FCC have always had a plan for deployment, this plan has shifted due to the complexities encountered during the development stage, causing initial deployment to be delayed. USAC and the Commission are currently working on adjusting the National Verifier

timeline and setting appropriate target dates for deployment, and expect to make an announcement regarding the revised date soon.

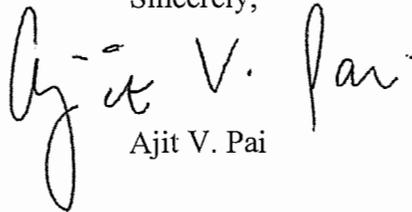
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5. *Please provide the detailed status report on the Commission's efforts to deploy the National Verifier requested in July and again in October.*

Attached are USAC's National Verifier Project Updates, issued after USAC's quarterly board meetings, also provided in response to Congresswoman Matsui's letter inquiring about the status of the National Verifier.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai

Enclosures



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Frank Pallone  
U.S. House of Representatives  
237 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Pallone:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

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In response to your particular questions:

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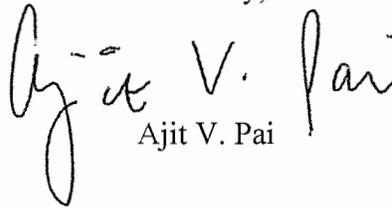
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Ajit V. Pai

Enclosures



OFFICE OF  
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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Mike Doyle  
U.S. House of Representatives  
239 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

I agree with you that the National Lifeline Eligibility Verifier will be one important tool in eliminating this waste, fraud, and abuse. But it is not the only one, nor will it solve all the problems with the program. It simply isn't prudent to sit idly by when hundreds of millions of taxpayer dollars are at stake. That's why the Commission last year sought comment on a wide variety of measures to improve the administration of the Lifeline program—from re-empowering state commissions to police Lifeline carriers to partnering with states to stand up the National Verifier, from improving program audits to adopting a self-enforcing budget. The Lifeline program's goal is—or should be—to empower consumers, not companies. And that will be our lodestar as we move forward to ensure that unscrupulous companies stop abusing this important program.

Turning to the National Verifier itself, as you know, the *2016 Lifeline Reform Order* called for the Universal Service Administrative Company to design and establish a National Verifier, along with the accompanying information technology, in 2017. Despite the fact that Commission staff was able to negotiate information-sharing agreements with six states on time, I learned on November 30, 2017 that USAC's implementation of the National Verifier had failed key security checks. Accordingly, the Wireline Competition Bureau postponed the National Verifier's launch until USAC could fully test the system for compliance with the Federal

Information Security Management Act of 2002 (FISMA). Although I was disappointed to learn of this failing—and to learn of it at such a late hour—the Commission cannot ignore its duty to safeguard consumers’ personal information.

In response to your particular questions:

1. *Please provide a comprehensive list of proactive efforts you have taken as Chairman, if any, to ensure that the National Verifier is deployed on time in all U.S. states and territories.*

I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. In early 2017, I directed Commission staff to work collaboratively with USAC to ensure the timely establishment of the National Verifier. In May 2017, after the resignation of the Chief Executive Officer of USAC following the flawed roll-out of E-Rate’s information technology system, I made clear to Commission staff and the USAC Board that finding a replacement with IT expertise was a priority. On December 13, I approved the appointment of Radha Sekar—an experienced federal information-technology administrator—as Chief Executive Officer of USAC. I also then sought, and received, the unqualified support of USAC’s Board of Directors to strengthen its oversight of USAC’s information technology and security systems. Since then, the Commission’s IT staff have been working hand in hand with USAC’s to ensure that the National Verifier comes into full FISMA compliance.

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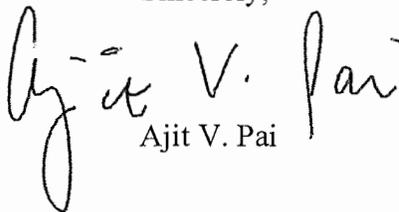
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Sincerely,



Ajit V. Pai

Enclosures



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jerry McNerney  
U.S. House of Representatives  
2265 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman McNerney:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

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In response to your particular questions:

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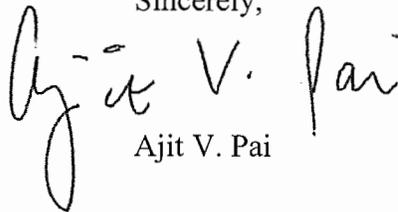
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I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in black ink that reads "Ajit V. Pai". The signature is written in a cursive style with a large, looped initial "A".

Ajit V. Pai

Enclosures



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Yvette D. Clarke  
U.S. House of Representatives  
2058 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Clarke:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

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Information Security Management Act of 2002 (FISMA). Although I was disappointed to learn of this failing—and to learn of it at such a late hour—the Commission cannot ignore its duty to safeguard consumers’ personal information.

In response to your particular questions:

1. *Please provide a comprehensive list of proactive efforts you have taken as Chairman, if any, to ensure that the National Verifier is deployed on time in all U.S. states and territories.*

I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. In early 2017, I directed Commission staff to work collaboratively with USAC to ensure the timely establishment of the National Verifier. In May 2017, after the resignation of the Chief Executive Officer of USAC following the flawed roll-out of E-Rate’s information technology system, I made clear to Commission staff and the USAC Board that finding a replacement with IT expertise was a priority. On December 13, I approved the appointment of Radha Sekar—an experienced federal information-technology administrator—as Chief Executive Officer of USAC. I also then sought, and received, the unqualified support of USAC’s Board of Directors to strengthen its oversight of USAC’s information technology and security systems. Since then, the Commission’s IT staff have been working hand in hand with USAC’s to ensure that the National Verifier comes into full FISMA compliance.

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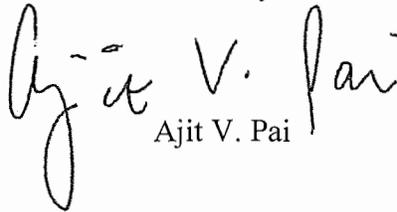
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Sincerely,



Ajit V. Pai

Enclosures



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable G.K. Butterfield  
U.S. House of Representatives  
2080 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Butterfield:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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In response to your particular questions:

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3. *Please provide the Commission's strategic plan to ensure that the National Verifier is deployed on time going forward.*

Commission staff continues to work closely with USAC to ensure timely deployment of the National Verifier. The USAC Board is fully committed to strengthening oversight and delivery of timely, secure, and reliable systems for the administration of the Universal Service Fund. Additional details about plans going forward may be found in USAC's most recent National Verifier Plan submission, which is attached to this letter. The initial launch of the National Verifier will provide valuable lessons for USAC and the Commission, and we plan to use those insights to inform the continued rollout of the system.

4. *Please provide a list of dated benchmarks detailing when the Commission plans to meet legal, practical, or deployment related goals for fully implementing the National Verifier on time in all U.S. states and territories.*

This is the first time that USAC has developed a database on this scale (nationwide and including over 10 million program participants, based on current estimates) and with this level of personally identifying information. Creating the National Verifier involves establishing interfaces with multiple states and federal agencies by first negotiating data-sharing agreements and then creating the electronic interfaces. The process also involves development of a back-end system to manage the complexity of simultaneous calls to multiple interfaces to verify identity and eligibility, and the creation of interactive portals for use by service providers and consumers. USAC has procured vendors to handle certain key aspects of the National Verifier, which itself has taken time and added complexity to the process.

Unfortunately, original estimates of the time associated with the deployment of the National Verifier have not tracked with the actual time associated with this work. The Commission did not complete an assessment of potential challenges before adopting the *2016 Lifeline Reform Order*, so challenges unanticipated by the initial proposed timelines for deployment have arisen and delayed deployment. For example, one of the most significant challenges has involved addressing FISMA compliance. This process has been more time consuming than USAC originally anticipated and forecasted to the FCC, but it is an area of the utmost importance and one that must be fully addressed before deployment of the National Verifier can occur. Thus, while USAC and the FCC have always had a plan for deployment, this plan has shifted due to the complexities encountered during the development stage, causing initial deployment to be delayed. USAC and the Commission are currently working on adjusting the National Verifier

timeline and setting appropriate target dates for deployment, and expect to make an announcement regarding the revised date soon.

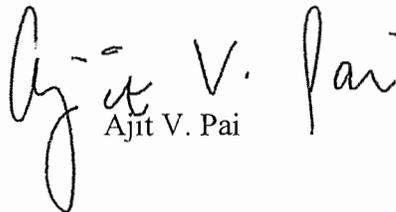
In the meantime, Commission staff and USAC continue to work on the expansion of the National Verifier in additional states to minimize the impact of the initial delay. Going forward, USAC has identified additional states and territories that it believes are appropriate candidates for launch in 2018 and is working with these states and territories to obtain data sharing agreements, where applicable, in addition to actively seeking data sharing agreements with federal agencies to maximize automated enrollment opportunities and cost savings. As USAC and the Commission get closer to finalizing plans to launch the National Verifier in additional states, the Wireline Competition Bureau will make announcements regarding the deployment schedule.

5. *Please provide the detailed status report on the Commission's efforts to deploy the National Verifier requested in July and again in October.*

Attached are USAC's National Verifier Project Updates, issued after USAC's quarterly board meetings, also provided in response to Congresswoman Matsui's letter inquiring about the status of the National Verifier.

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

  
Ajit V. Pai

Enclosures



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Peter Welch  
U.S. House of Representatives  
2303 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Welch:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

I agree with you that the National Lifeline Eligibility Verifier will be one important tool in eliminating this waste, fraud, and abuse. But it is not the only one, nor will it solve all the problems with the program. It simply isn't prudent to sit idly by when hundreds of millions of taxpayer dollars are at stake. That's why the Commission last year sought comment on a wide variety of measures to improve the administration of the Lifeline program—from re-empowering state commissions to police Lifeline carriers to partnering with states to stand up the National Verifier, from improving program audits to adopting a self-enforcing budget. The Lifeline program's goal is—or should be—to empower consumers, not companies. And that will be our lodestar as we move forward to ensure that unscrupulous companies stop abusing this important program.

Turning to the National Verifier itself, as you know, the *2016 Lifeline Reform Order* called for the Universal Service Administrative Company to design and establish a National Verifier, along with the accompanying information technology, in 2017. Despite the fact that Commission staff was able to negotiate information-sharing agreements with six states on time, I learned on November 30, 2017 that USAC's implementation of the National Verifier had failed key security checks. Accordingly, the Wireline Competition Bureau postponed the National Verifier's launch until USAC could fully test the system for compliance with the Federal

Information Security Management Act of 2002 (FISMA). Although I was disappointed to learn of this failing—and to learn of it at such a late hour—the Commission cannot ignore its duty to safeguard consumers’ personal information.

In response to your particular questions:

1. *Please provide a comprehensive list of proactive efforts you have taken as Chairman, if any, to ensure that the National Verifier is deployed on time in all U.S. states and territories.*

I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. In early 2017, I directed Commission staff to work collaboratively with USAC to ensure the timely establishment of the National Verifier. In May 2017, after the resignation of the Chief Executive Officer of USAC following the flawed roll-out of E-Rate’s information technology system, I made clear to Commission staff and the USAC Board that finding a replacement with IT expertise was a priority. On December 13, I approved the appointment of Radha Sekar—an experienced federal information-technology administrator—as Chief Executive Officer of USAC. I also then sought, and received, the unqualified support of USAC’s Board of Directors to strengthen its oversight of USAC’s information technology and security systems. Since then, the Commission’s IT staff have been working hand in hand with USAC’s to ensure that the National Verifier comes into full FISMA compliance.

I also directed staff to commence negotiations with several states to come to data-sharing agreements, to ensure that at least five states would be ready for the launch in December 2017. In August 2017, the FCC announced that the initial launch of the National Verifier would occur in six states—Colorado, Mississippi, Montana, New Mexico, Utah, and Wyoming. While we continue to pursue additional agreements, the Commission sought comment in the *2017 Lifeline Reform Order* on additional ways to encourage states to work cooperatively with the Commission and USAC to integrate their state databases into the National Verifier without unnecessary delay.

Finally, I have directed our staff to work with our federal partners to facilitate data-sharing agreements for federal programs that qualify consumers for Lifeline. My office worked directly with the U.S. Department of Housing and Urban Development to facilitate the first such arrangement, and Commission staff continue to pursue others.

2. *Please provide a comprehensive list of what proactive efforts FCC staff have taken, if any, to ensure that the National Verifier is deployed on time in all U.S. states and territories.*

Commission staff support the National Verifier project by overseeing the development of National Verifier processes to ensure compliance with the Lifeline rules and applicable laws; negotiating and entering into data-sharing agreements with existing data sources to enable the National Verifier to cost-effectively verify subscribers’ eligibility; updating the Lifeline program’s System of Records Notice, Paperwork Reduction Act approvals, Records Schedule, and Privacy Impact Assessment to incorporate the National Verifier; providing guidance to USAC as it develops processes for reverifying consumers as they

are migrated into the National Verifier; providing ongoing feedback and guidance to USAC as it finalizes the online portals that will be used by consumers and service providers to interface with the National Verifier; assisting in finalizing paper and online forms for use with the National Verifier; and reviewing procurements related to the National Verifier, when appropriate. Commission staff have also been actively collaborating with USAC's information technology and security compliance efforts.

3. *Please provide the Commission's strategic plan to ensure that the National Verifier is deployed on time going forward.*

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4. *Please provide a list of dated benchmarks detailing when the Commission plans to meet legal, practical, or deployment related goals for fully implementing the National Verifier on time in all U.S. states and territories.*

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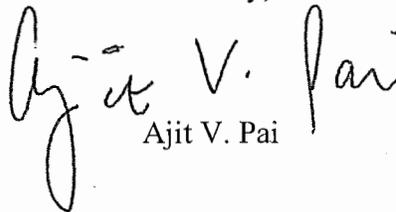
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I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,



Ajit V. Pai

Enclosures

## **National Verifier (NV) Project Update**

### **January 2018**

On December 1, 2017, the FCC announced that the National Verifier soft launch intended for December 5, 2017 would be delayed to early 2018. Despite the fact that USAC had completed work to launch in six states and with the Department of Housing and Urban Development, USAC was unable to complete the necessary FISMA accreditation steps in time for the launch. USAC and the FCC have been closely collaborating to identify the remaining steps, ensure they are conducted with a high level of confidence, and identify new dates for the initial launch. USAC and the FCC anticipate announcing the new soft launch date, as well as any downstream impact to the hard launch date, very soon. In the event this information is available at the time of the meeting, we will discuss it as additional information to this update.

Although we did not go live with the system as scheduled, USAC completed the activities associated with executing state and federal Computer Matching Agreements (CMAs), finalizing functional development of the system and processes, and conducting training for users in the initial six states. As such, the teams are not delayed in moving forward with the requirements for the hard launch or with the additional 19 states required by the end of 2018 (a total of 25 states implemented).

#### *Program Outreach*

In 4Q2017, USAC invited points of contact within state agencies that are experienced in eligibility verification to assist with User Acceptance Testing of the National Verifier system. These contacts were not part of the initial states, which gave them a real “fresh eyes” perspective having been a bit more removed from the process and information updates. The testers indicated that the system was user friendly and easy to navigate, and they had no issues with uploading required documents. No defects were reported, and feedback received will be considered as future enhancements to the system.

Also in 4Q2017, Lifeline ramped up training opportunities for service providers in National Verifier-initial launch states. In addition to providing seven formal training sessions, USAC also held five, one-hour long “office hours” sessions to allow service providers additional time for open Q&A, and published five how-to guides about the National Verifier system. For service providers in initial launch states that had not attended available trainings, Lifeline conducted individual outreach to ensure they are aware of the requirements and processes for the National Verifier.

In 1Q2018, Lifeline will begin to engage with the consumer community in the initial launch states, who will begin using the National Verifier upon hard launch. Lifeline will engage with community advocates by presenting a live training webinar and publishing two consumer-facing videos that explain both the Lifeline Program and the National Verifier. USAC plans to open registration for the webinar earlier than usual and reach out to national associations<sup>1</sup> to encourage

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<sup>1</sup> Associations include the Digital Inclusion Alliance, American Library Association, National Hispanic Media Coalition, NASUCA, and state/tribal SNAP/HHS/PHA offices.

them to promote the session through their own member channels. Our target audiences include social service agencies, low-income assistance centers, senior centers, and consumer advocates from state government agencies. Lifeline is working closely with USAC’s experience designers to research and test the consumer portal interaction experience to ensure it is intuitive for users and the advocates who are assisting them.

*State & Federal Engagement*

Efforts are well underway towards bringing the additional 19 states or territories into the National Verifier by the end of 2018. For agencies with whom we seek an automated interface, we must execute a CMA. For those with whom we will not pursue an interface because it is not technically feasible or cost effective, no CMA is required to implement a manual review solution. This does not necessarily mean we will launch them in three waves, as the precise timing of launching in additional states is dependent upon finalization of the revised initial soft and hard launch dates.

The key milestones associated with the work groups are shown below.

<b>Group</b>	<b>USAC &amp; Agency Agreement to CMA</b>	<b>FCC Privacy Officer Agreement to CMA</b>	<b>FCC Data Integrity Board Approval</b>	<b>Congress &amp; OMB Approval</b>	<b>Conclusion of Federal Register Period (CMA is effective)</b>
<b>1</b>	January 2018	February 2018	March 2018	States will be grouped by launch date for each of these 60 day periods.	
<b>2</b>	March 2018	April 2018	May 2018		
<b>3</b>	June 2018	July 2018	August 2018		

In three states, CMAs are nearing final agreement between USAC and the agency. Several additional states are reviewing the draft CMA and providing feedback, although they are a bit earlier in the negotiation process. In addition, USAC has identified approximately 10 states or territories that are candidates for manual implementation of the National Verifier. In these cases, no automated interface would be built to the state because it is more cost effective to leverage federal sources and process the remaining applications through the BPO document review processes.

In addition to the work described above, USAC and the FCC are actively engaged with federal agencies who may offer additional data sharing opportunities.

In December 2017, members of the Lifeline team traveled to Navajo Nation in Window Rock, AZ to learn more about opportunities to improve upon Tribal enrollment processes. The hosts convened a meeting with approximately 20 leaders of the Navajo Nation who focus on social service programs or their related IT systems. Navajo President Begaye joined the group to extend his appreciation for our visit and desire to collaborate. In addition, Lifeline received an in-depth demonstration of work by the Navajo Nation Addressing Authority to learn how they

are using GIS technology to document and track residences that do not have standard deliverable addresses, which is a challenge in the Lifeline program to ensure reliable prevention of duplicate household benefits. This was just the beginning of an important series of conversations, and follow up is underway to pursue additional information about potential data connections.

### *Technical Build*

Despite the delayed soft launch, USAC and Accenture continue to work on the existing contractual deadlines for the National Verifier hard launch. Accenture delivered the soft launch functionality as required on December 5, 2017, and has begun working towards the hard launch requirements that are due by March 13, 2018. Accenture has also begun engaging with the additional state and federal agencies with whom we may build additional interfaces.

The hard launch milestone will include the final, fully tested consumer portal functionality, including that which is used to support annual recertification. It also includes some additional development to fully support the back end BPO processes. These features are on track to be built and tested by March 13th.

### *Operations*

Conduent has not begun processing National Verifier transactions as expected due to the delayed launch. However, because of expiring agreements with other call center vendors, Conduent assumed responsibility for the consumer call center and NLAD support call center in January 2018. Conduent will continue to provide this support until the initial launch, at which point it will begin processing new applications and conducting the reverification activities.

In the October 2017 meeting, Lifeline provided additional information on anticipated volumes of National Verifier transactions and the impacts of fluctuations in price as a result of ranges of potential volumes. At that time, we committed to begin providing quarterly reports of forecast versus actuals in January 2018. Given the delayed launch, we will begin providing this information at the first meeting that follows the commencement of National Verifier operations.



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Adriano Espaillat  
U.S. House of Representatives  
1630 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Espaillat:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

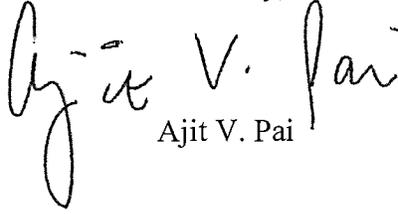
I agree with you that the National Verifier will be one important tool in eliminating this waste, fraud, and abuse. But it is not the only one, nor will it solve all the problems with the program. It simply isn't prudent to sit idly by when hundreds of millions of taxpayer dollars are at stake. That's why the Commission last year sought comment on a wide variety of measures to improve the administration of the Lifeline program—from re-empowering state commissions to police Lifeline carriers to partnering with states to stand up the National Verifier, from improving program audits to adopting a self-enforcing budget. We are currently reviewing the record that has been compiled in response to that Notice of Proposed Rulemaking to determine the best path forward, and your letter has been added to that record.

The Lifeline program's goal is—or should be—to empower consumers, not companies. And that will be our lodestar as we move forward to ensure that unscrupulous companies stop abusing this important program.

Page 2—The Honorable Adriano Espaillat

I appreciate your continued interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Anna G. Eshoo  
U.S. House of Representatives  
241 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Eshoo:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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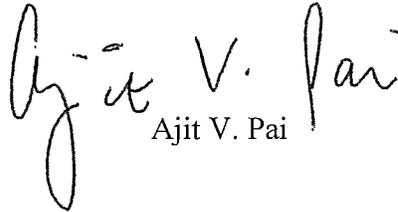
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Barbara Lee  
U.S. House of Representatives  
2267 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Lee:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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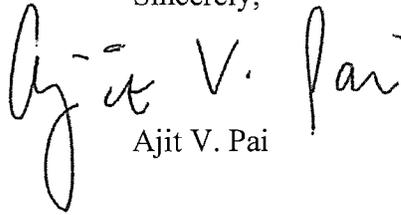
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Ben Ray Luján  
U.S. House of Representatives  
2231 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Luján:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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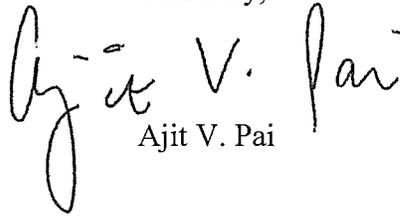
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Betty McCollum  
U.S. House of Representatives  
2256 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman McCollum:

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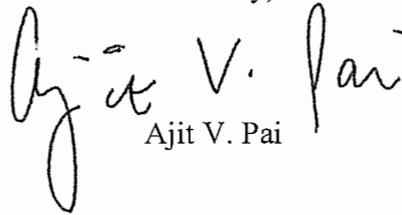
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Page 2—The Honorable Betty McCollum

I appreciate your continued interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Bobby L. Rush  
U.S. House of Representatives  
2188 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Rush:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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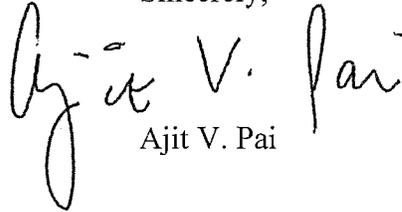
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Page 2—The Honorable Bobby L. Rush

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Bonnie Watson Coleman  
U.S. House of Representatives  
1535 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Watson Coleman:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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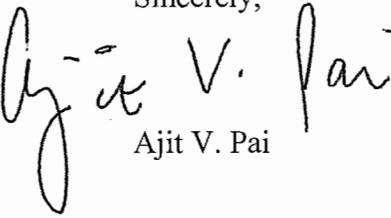
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Page 2—The Honorable Bonnie Watson Coleman

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Carol Shea-Porter  
U.S. House of Representatives  
1530 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Shea-Porter:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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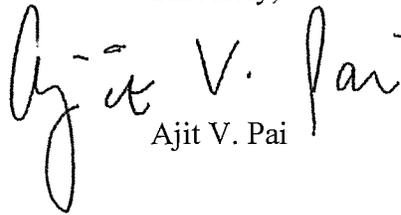
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Page 2—The Honorable Carol Shea-Porter

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Carolyn B. Maloney  
U.S. House of Representatives  
2308 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Maloney:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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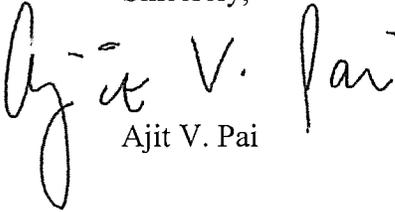
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Page 2—The Honorable Carolyn B. Maloney

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Cedric L. Richmond  
U.S. House of Representatives  
420 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Richmond:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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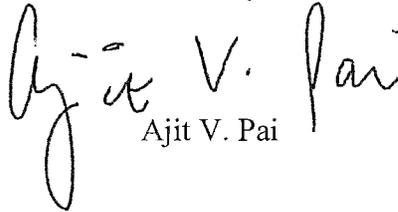
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Page 2—The Honorable Cedric L. Richmond

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Colleen Hanabusa  
U.S. House of Representatives  
422 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Hanabusa:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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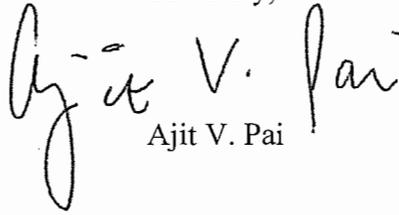
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Page 2—The Honorable Colleen Hanabusa

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 1, 2018

The Honorable Danny K. Davis  
U.S. House of Representatives  
2159 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Davis:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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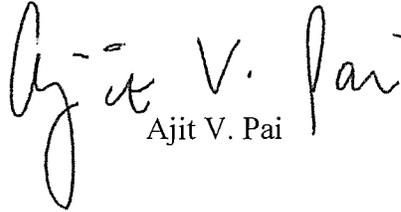
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Page 2—The Honorable Danny K. Davis

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable David Scott  
U.S. House of Representatives  
225 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Scott:

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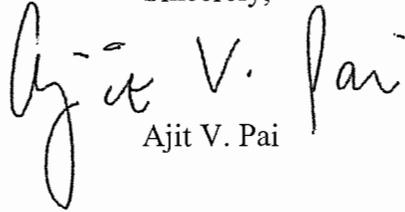
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Diana DeGette  
U.S. House of Representatives  
2368 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman DeGette:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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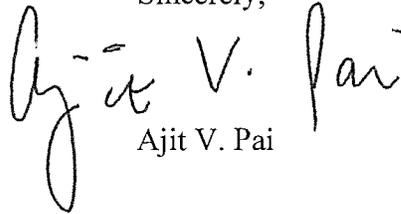
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Page 2—The Honorable Diana DeGette

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Ajit V. Pai

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 1, 2018

The Honorable Dina Titus  
U.S. House of Representatives  
2464 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Titus:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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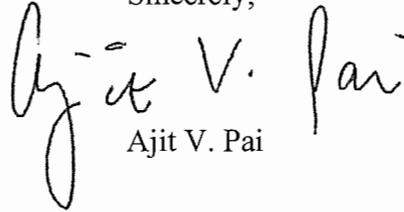
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Page 2—The Honorable Dina Titus

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Don Beyer  
U.S. House of Representatives  
1119 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Beyer:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

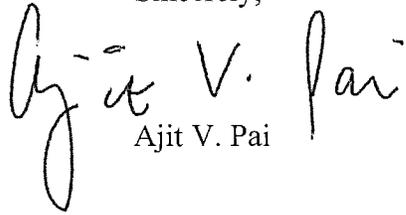
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The Lifeline program's goal is—or should be—to empower consumers, not companies. And that will be our lodestar as we move forward to ensure that unscrupulous companies stop abusing this important program.

Page 2—The Honorable Don Beyer

I appreciate your continued interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Doris Matsui  
U.S. House of Representatives  
2311 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Matsui:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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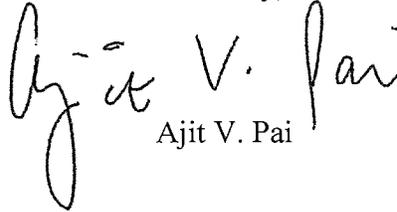
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Page 2—The Honorable Doris Matsui

I appreciate your continued interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Earl Blumenauer  
U.S. House of Representatives  
1111 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Blumenauer:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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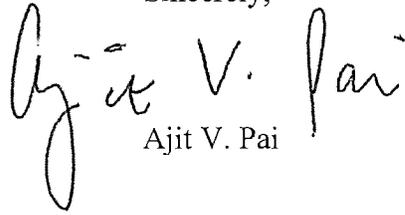
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Page 2—The Honorable Earl Blumenauer

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Ajit V. Pai

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Eleanor Holmes Norton  
U.S. House of Representatives  
2136 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Norton:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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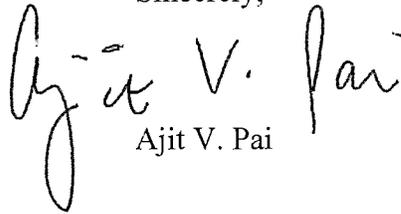
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Page 2—The Honorable Eleanor Holmes Norton

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Eliot L. Engel  
U.S. House of Representatives  
2462 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Engel:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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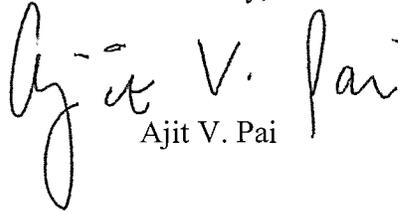
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Page 2—The Honorable Eliot L. Engel

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable G.K. Butterfield  
U.S. House of Representatives  
2080 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Butterfield:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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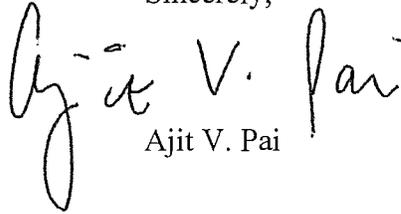
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Page 2—The Honorable G.K. Butterfield

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Gene Green  
U.S. House of Representatives  
2470 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Green:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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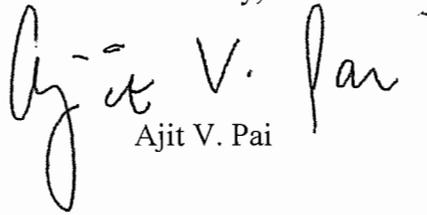
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Page 2—The Honorable Gene Green

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Grace F. Napolitano  
U.S. House of Representatives  
1610 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Napolitano:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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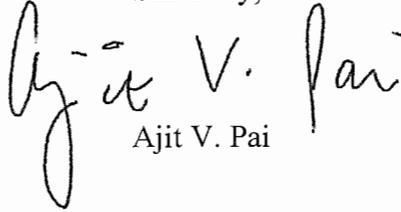
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Page 2—The Honorable Grace F. Napolitano

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Ajit V. Pai

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Grace Meng  
U.S. House of Representatives  
1317 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Meng:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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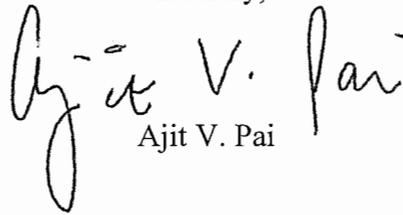
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Page 2—The Honorable Grace Meng

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Gregorio Kilili Camacho Sablan  
U.S. House of Representatives  
2411 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Sablan:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

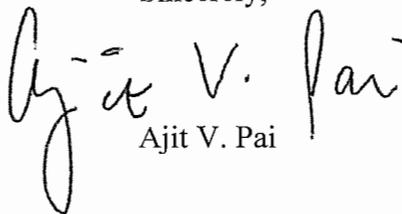
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Gwen Moore  
U.S. House of Representatives  
2252 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Moore:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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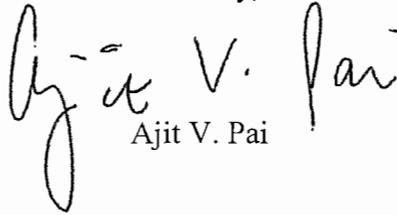
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Page 2—The Honorable Gwen Moore

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Hakeem Jeffries  
U.S. House of Representatives  
1607 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Jeffries:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

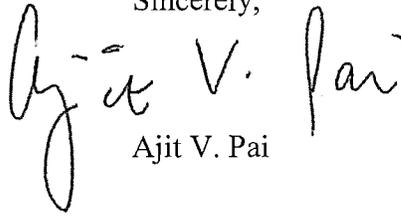
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The Lifeline program's goal is—or should be—to empower consumers, not companies. And that will be our lodestar as we move forward to ensure that unscrupulous companies stop abusing this important program.

Page 2—The Honorable Hakeem Jeffries

I appreciate your continued interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Hank Johnson  
U.S. House of Representatives  
2240 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Johnson:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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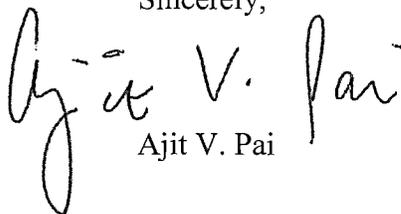
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Page 2—The Honorable Hank Johnson

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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jamie Raskin  
U.S. House of Representatives  
431 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Raskin:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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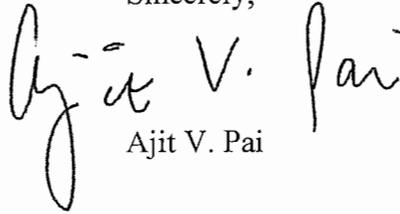
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Page 2—The Honorable Jamie Raskin

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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jan Schakowsky  
U.S. House of Representatives  
2367 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Schakowsky:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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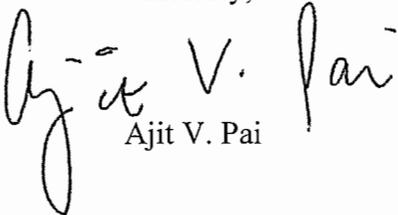
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Page 2—The Honorable Jan Schakowsky

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jared Huffman  
U.S. House of Representatives  
1406 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Huffman:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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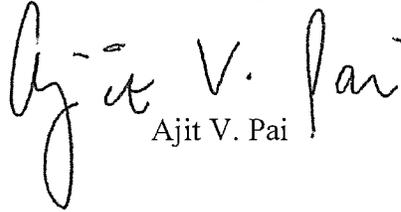
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jerry McNerney  
U.S. House of Representatives  
2265 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman McNerney:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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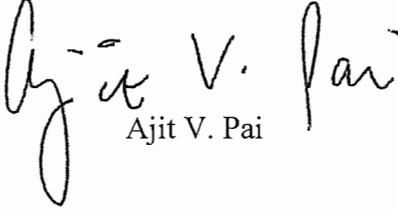
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Page 2—The Honorable Jerry McNerney

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jim Costa  
U.S. House of Representatives  
2081 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Costa:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

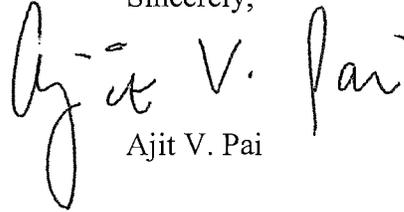
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jim McGovern  
U.S. House of Representatives  
438 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman McGovern:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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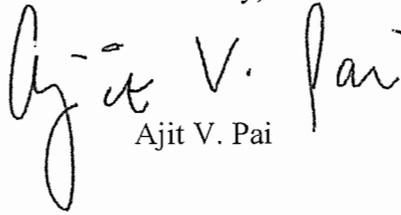
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable John Delaney  
U.S. House of Representatives  
1632 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Delaney:

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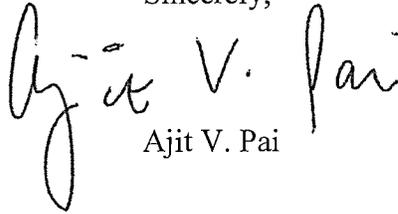
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THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable John Garamendi  
U.S. House of Representatives  
2438 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Garamendi:

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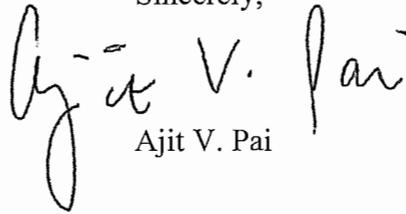
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable John Yarmuth  
U.S. House of Representatives  
131 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Yarmuth:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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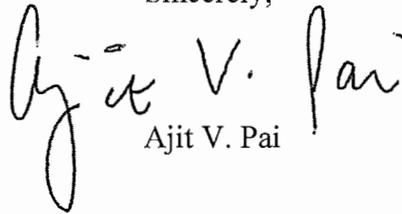
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Page 2—The Honorable John Yarmuth

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Jose E. Serrano  
U.S. House of Representatives  
2354 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Serrano:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

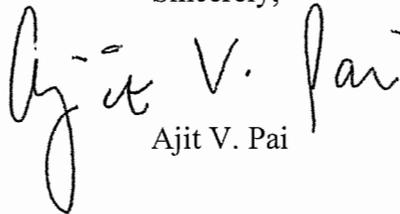
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The Lifeline program's goal is— or should be—to empower consumers, not companies. And that will be our lodestar as we move forward to ensure that unscrupulous companies stop abusing this important program.

Page 2—The Honorable Jose E. Serrano

I appreciate your continued interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Judy Chu  
U.S. House of Representatives  
2423 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Chu:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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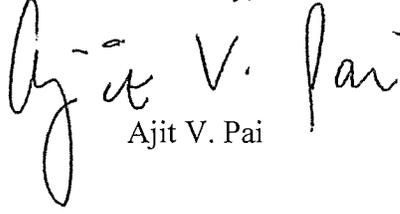
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Page 2—The Honorable Judy Chu

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Keith Ellison  
U.S. House of Representatives  
2244 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Ellison:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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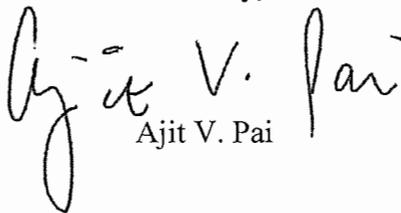
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Page 2—The Honorable Keith Ellison

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Lucille Roybal-Allard  
U.S. House of Representatives  
2083 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Roybal-Allard:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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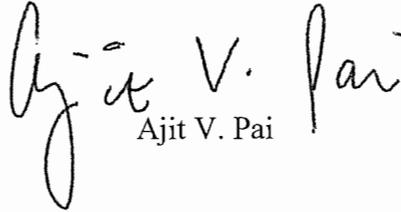
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Page 2—The Honorable Lucille Roybal-Allard

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Luis V. Gutiérrez  
U.S. House of Representatives  
2408 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Gutiérrez:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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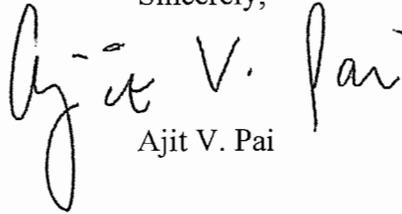
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Page 2—The Honorable Luis V. Gutiérrez

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Ajit V. Pai

Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Madeleine Z. Bordallo  
U.S. House of Representatives  
2441 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Bordallo:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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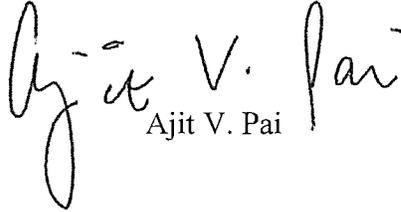
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Page 2—The Honorable Madeleine Z. Bordallo

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Mark DeSaulnier  
U.S. House of Representatives  
115 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman DeSaulnier:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

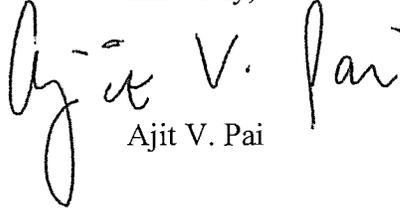
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Mark Pocan  
U.S. House of Representatives  
1421 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Pocan:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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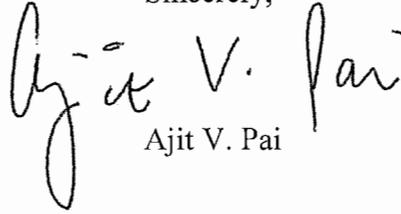
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Mark Takano  
U.S. House of Representatives  
1507 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Takano:

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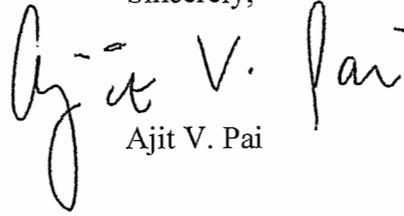
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Michael E. Capuano  
U.S. House of Representatives  
1414 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Capuano:

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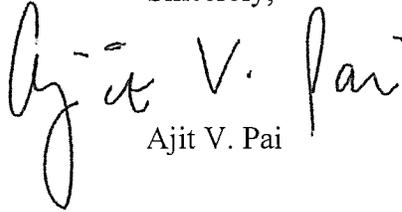
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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Mike Doyle  
U.S. House of Representatives  
239 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Doyle:

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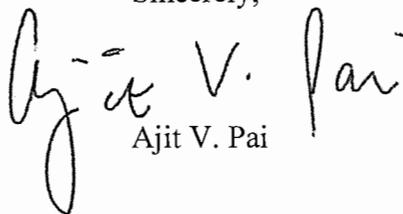
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Nanette Barragan  
U.S. House of Representatives  
1320 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Barragan:

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At the same time, I am deeply committed to ensuring that the Commission fulfills its obligation to be a responsible steward of the Universal Service Fund. It is critical to strengthen the Lifeline program's efficacy and integrity by reducing the waste, fraud, and abuse that has run rampant in this program for the better part of a decade. For example, GAO discovered 1,234,929 Lifeline subscribers who apparently were not eligible to participate in the program as well as 6,378 individuals who apparently reenrolled after being reported dead. That limited sample alone constituted more than \$137 million in abuse each year.

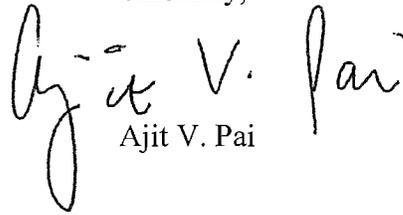
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Page 2—The Honorable Nanette Barragan

I appreciate your continued interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Nydia M. Velazquez  
U.S. House of Representatives  
2302 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Velazquez:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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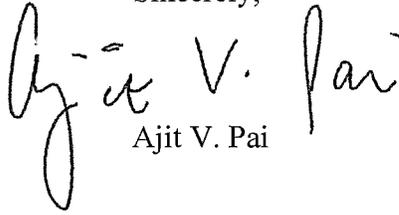
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Page 2—The Honorable Nydia M. Velazquez

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 1, 2018

The Honorable Paul Tonko  
U.S. House of Representatives  
2463 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Tonko:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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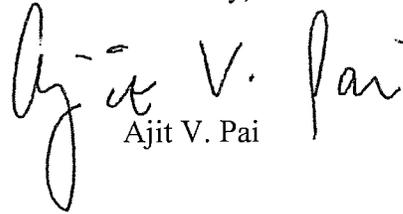
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Page 2—The Honorable Paul Tonko

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Peter A. DeFazio  
U.S. House of Representatives  
2134 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman DeFazio:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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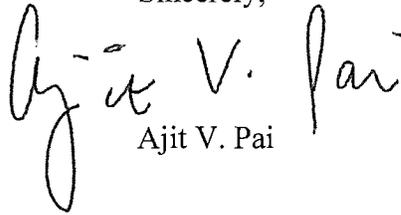
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Page 2—The Honorable Peter A. DeFazio

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 1, 2018

The Honorable Peter Welch  
U.S. House of Representatives  
2303 Rayburn House Office Building  
Washington, D.C. 20515

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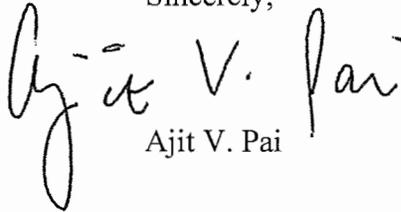
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Rick Nolan  
U.S. House of Representatives  
2366 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Nolan:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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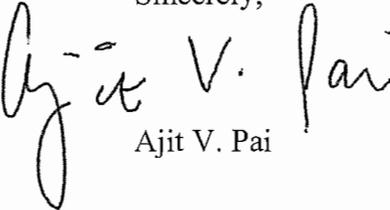
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Page 2—The Honorable Rick Nolan

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Ro Khanna  
U.S. House of Representatives  
513 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Khanna:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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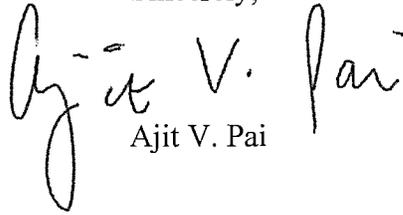
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Page 2—The Honorable Ro Khanna

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Robert A. Brady  
U.S. House of Representatives  
2004 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Brady:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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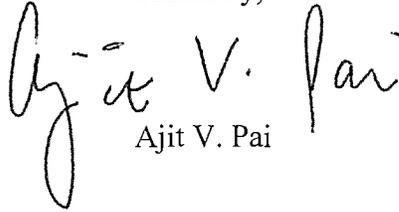
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Page 2—The Honorable Robert A. Brady

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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Robert C. Scott  
U.S. House of Representatives  
1201 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Scott:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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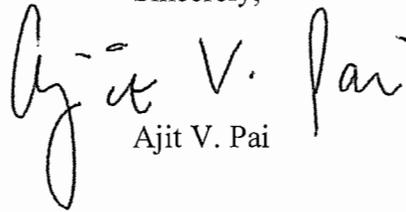
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Robin Kelly  
U.S. House of Representatives  
1239 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Kelly:

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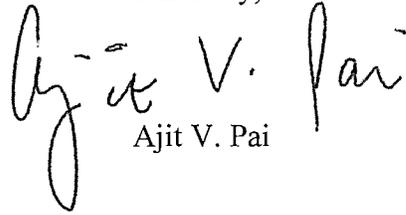
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Page 2—The Honorable Robin Kelly

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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Sanford D. Bishop  
U.S. House of Representatives  
2407 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Bishop:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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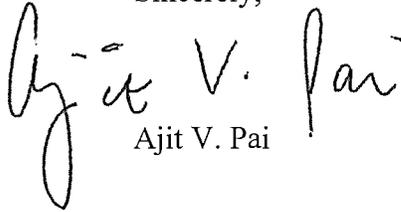
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Page 2—The Honorable Sanford D. Bishop

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Steve Cohen  
U.S. House of Representatives  
2404 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Cohen:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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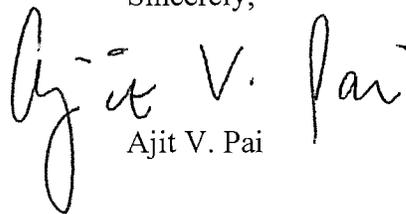
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Page 2—The Honorable Steve Cohen

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Sincerely,

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Suzanne Bonamici  
U.S. House of Representatives  
439 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Bonamici:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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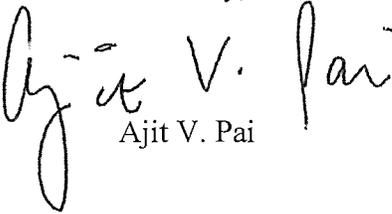
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Page 2—The Honorable Suzanne Bonamici

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Ted Lieu  
U.S. House of Representatives  
236 Cannon House Office Building  
Washington, D.C. 20515

Dear Congressman Lieu:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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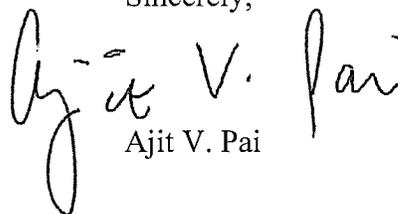
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Page 2—The Honorable Ted Lieu

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Terri A. Sewell  
U.S. House of Representatives  
2201 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Sewell:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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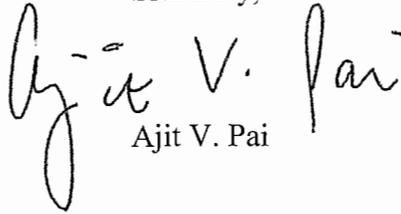
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Page 2—The Honorable Terri A. Sewell

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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Tim Ryan  
U.S. House of Representatives  
1126 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Ryan:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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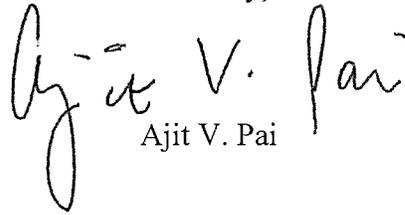
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Tony Cárdenas  
U.S. House of Representatives  
1510 Longworth House Office Building  
Washington, D.C. 20515

Dear Congressman Cárdenas:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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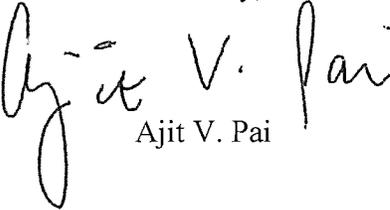
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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Tulsi Gabbard  
U.S. House of Representatives  
1433 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Gabbard:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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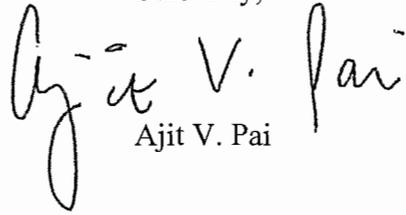
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Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Yvette D. Clarke  
U.S. House of Representatives  
2058 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congresswoman Clarke:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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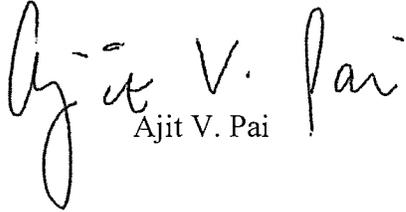
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Page 2—The Honorable Yvette D. Clarke

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OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

June 1, 2018

The Honorable Zoe Lofgren  
U.S. House of Representatives  
1401 Longworth House Office Building  
Washington, D.C. 20515

Dear Congresswoman Lofgren:

Thank you for your letter regarding the Lifeline program. I am committed to bridging the digital divide, and, like you, I believe the Lifeline program can help do just that. That is why the Commission adopted the *2017 Lifeline Reform Order*, which seeks to focus Lifeline support where it is most needed and incentivize investment in networks that enable 21<sup>st</sup> Century connectivity for all Americans. The *Order* increased consumer choice by eliminating restrictions that barred Lifeline consumers from changing Lifeline providers for a year and protected consumers by barring low-quality services that offered mobile broadband in theory but failed to do so in practice.

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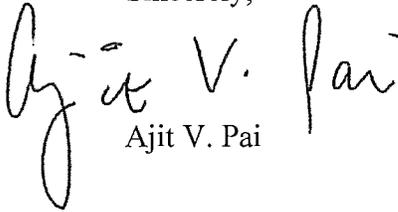
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Page 2—The Honorable Zoe Lofgren

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Ajit V. Pai



Federal Communications Commission  
Washington, D.C. 20554

Thomas M. Johnson, Jr.  
General Counsel

April 16, 2018

The Honorable Frank Pallone, Jr.  
Ranking Member  
Committee on Energy and Commerce  
United States House of Representatives  
2125 Rayburn House Office Building  
Washington, D.C. 20515-6115

The Honorable Michael F. Doyle  
Ranking Member  
Subcommittee on Communications and Technology  
Committee on Energy and Commerce  
United States House of Representatives  
239 Cannon House Office Building  
Washington, D.C. 20515-3814

Dear Representatives Pallone and Doyle:

I write in response to your March 26, 2018 letter, addressed to Chairman Ajit Pai and Commissioners Michael O’Rielly and Brendan Carr, regarding their recent appearance at the Conservative Political Action Conference (CPAC) hosted by the American Conservative Union (ACU). At CPAC, the three Commissioners took part in a panel discussion entitled “To Infinity and Beyond: How the FCC is Paving the Way for Innovation.”

Your letter suggests that the Commissioners’ participation at CPAC may have been “ethically questionable.” To the contrary, their participation was consistent with a long tradition of Commissioners contributing to robust debate on issues of importance to the agency and the nation. For example, at the CPAC panel in question, the Commissioners discussed topics ranging from empowering entrepreneurs to develop new technologies to expanding broadband access to Americans in rural areas. The Commissioners’ ability to accept prominent speaking engagements like this one helps promote transparency and accountability and encourages public participation and interest in Commission rulemakings, without contravening applicable ethics obligations.

Indeed, because the Commission consists of Presidentially appointed members from both political parties, Commissioners routinely speak at events sponsored by groups or attended by individuals whose viewpoints span the legal and political spectrum. In recent years, Commissioners have made appearances at events sponsored by the Center for American Progress, the Rainbow/PUSH Coalition, the Progressive Policy Institute, the Heritage Foundation, and the Federalist Society, to name a few examples. This tradition of bipartisan participation in a broad array of legal and public policy conferences does not, and has never been understood to, violate applicable ethics rules.

As your letter notes, the Hatch Act, its implementing regulations, and federal ethics rules place important limitations on the activities of public officials. Accordingly, career ethics attorneys in the Commission's Office of General Counsel regularly train and advise Commissioners and their staff on compliance with the Hatch Act and other legal and ethical requirements. As explained below, however, our career agency ethics officials have consistently treated the Commissioners' participation on panels at events such as CPAC as well within the bounds of what applicable rules allow. Indeed, career ethics officials advised the Chairman's Office prior to the event that it would be appropriate for the three Commissioners to appear together on the panel in question.

The Hatch Act places certain limitations on covered Executive Branch employees (including Commissioners) who participate in political activity. Political activity, however, is narrowly defined as "an activity directed toward the success or failure of a political party, candidate for partisan political office, or partisan political group." 5 C.F.R. § 734.101. By participating in a panel at CPAC this year and in past years, the Chairman and Commissioners were not engaging in partisan political activity. Rather, they were presenting information on behalf of the Commission, including both facts and opinions on public policy issues within the agency's purview.

The mere fact that the leadership or audience at an event may lean in one political direction does not transform an organization into a "partisan political group" under the Hatch Act. The ACU, a tax-exempt 501(c)(4) organization, describes itself as "the leading entity in providing conservative positions on issues to Congress, the Executive Branch, State Legislatures, the media, political candidates, and the public." American Conservative Union, <http://conservative.org/about/>. While ACU has a conservative outlook, it is not affiliated with any one political party, and tickets to CPAC are available for sale to the public regardless of political affiliation. Similarly, the Center for American Progress, a 501(c)(3) organization, describes itself as "dedicated to improving the lives of all Americans, through bold, progressive ideas," but has no formal party affiliation—despite partnering with a 501(c)(4) that engages in some political advocacy. Center for American Progress, <https://www.americanprogress.org/mission/>.

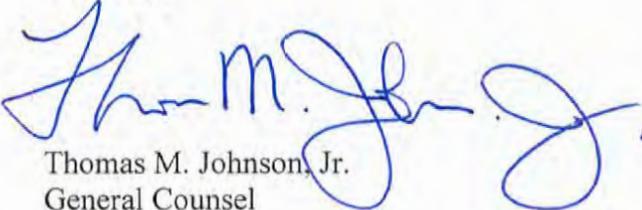
The U.S. Office of Special Counsel, which is tasked with interpreting and implementing the Hatch Act, has reviewed these common arrangements among non-profit organizations and concluded that even though 501(c)(4)s like ACU are permitted to participate in some political activity on behalf of or in opposition to candidates, they are not "partisan political group[s]" for purposes of the Act because political activity is not their primary activity. U.S. Office of Special Counsel, <https://osc.gov/Pages/HatchAct-FAQs.aspx>.

Because participation at CPAC is not political activity, as defined by the Hatch Act, there was no need for any Commissioner to abide by the limitations that the Act places on the use of appropriated funds, official staff, or agency resources in connection with such activity. *See* 5 C.F.R. § 734.503. Rather, it was entirely appropriate for those Commissioners to use staff resources to prepare remarks and otherwise assist them in appearing before CPAC.

Nor did the Commissioners violate any legal or ethical rule by accepting free admission to CPAC. Pursuant to the Standards of Ethical Conduct for Employees of the Executive Branch, when an agency official is asked to speak at an event, his or her attendance is not a gift for ethics purposes, nor is the attendance of accompanying staff. *See* 5 C.F.R. § 2635.203(b)(8). Relatedly, as the Commissioners appeared at the event to discuss FCC programs and policies, the inclusion of the Commissioners' photos along with other speakers in materials about the event was appropriate and consistent with ethical rules and standards.

The Commission and the Office of General Counsel take our ethical responsibilities very seriously, and when issues arise, we take prompt action to address them, including, where appropriate, cooperating and coordinating with the Office of Government Ethics and the Office of Special Counsel. The Commissioners, however, acted well within their rights under the Hatch Act and federal ethical rules by participating in the CPAC panel and consistent with the practice of past Commissioners appointed under both Democratic and Republican Presidents. I trust this information has been helpful to you and thank you for your inquiry.

Sincerely,



Thomas M. Johnson, Jr.  
General Counsel



Federal Communications Commission  
Washington, D.C. 20554

May 21, 2018

Brendan Carr  
Commissioner

The Honorable Anna Eshoo  
241 Cannon House Office Building  
Washington, DC 20515

Dear Congresswoman Eshoo:

Thank you for your letter concerning the *Accelerating Wireless Broadband Deployment* Second Report and Order, which the Commission approved in March. I appreciate your reaching out to me on this issue.

I share the commitment you express in your letter to enabling the deployment of next-generation wireless technologies. And I commend you for your leadership on these issues. I also appreciate the points you make in your letter regarding the National Historic Preservation Act (NHPA).

As you know, 5G wireless technologies hold the potential to transform communities. 5G networks will support next-generation innovations—from autonomous cars to smart city applications, from new and competitive broadband offerings to the burgeoning Internet of Things. 5G also will help create good-paying jobs. According to an Accenture study, upgrading our country's networks to 5G could prompt \$275 billion of private sector investment, add half a trillion dollars to our GDP, and create three million jobs.

To ensure that all communities can benefit from these opportunities, it is critical that we modernize our approach to broadband infrastructure deployment. This is what the FCC did in our March 2018 decision.

First, we determined that the deployment of a small wireless facility does not constitute a “federal undertaking” within the meaning of NHPA or a “major federal action” under the National Environmental Policy Act (NEPA).

Second, for larger wireless deployments, we streamlined the applicable federal review process consistent with NEPA and NHPA law.

In reaching these decisions, the Commission considered extensive public comment and feedback. Nearly 900 comments were submitted to the Commission from environmental groups, local governments, industry, and many others. In recognition of the Commission's trust responsibility to, and government-to-government relationship with, federally recognized Tribal Nations, we made extensive efforts to consult with Tribes. Starting in 2016, Commissioners and FCC staff traveled to at least nine different states to meet with more than 50 Tribes and their associations. These consultations resulted in numerous policy changes. For example, in response to Tribes' input, we rejected a proposal to impose “geographic area of interest” limitations on Tribes, and we declined to regulate the fees Tribes may charge wireless providers as paid consultants.

Page Two

May 21, 2018

Based on the record, we expect that this decision will deliver results for communities across the country. According to an international consulting firm's analysis, the FCC's decision will result in \$1.56 billion in savings, which could be used to deploy more than 55,000 new cell sites and create 17,000 jobs.

I also am glad that a diverse group of stakeholders supported the Commission's decision: tech advocates like The App Association, INCOMPAS, CCIA, and CTA; smaller broadband providers at CCA and CTIA; voices from underserved communities like the League of United Latin American Citizens, LGBT Tech, and National Grange; job creators like the Small Business & Entrepreneurship Council and the U.S. Chamber; and other organizations including the Progressive Policy Institute, Citizens Against Government Waste, FreedomWorks, and the U.S. Small Business Administration.

Thank you again for contacting me about the Commission's March Order. I welcome the chance to continue the discussion. And I look forward to working with you on policies that will bring more broadband to more Americans.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brendan Carr", with a horizontal line extending to the right.

Brendan Carr



Federal Communications Commission  
Washington, D.C. 20554

May 21, 2018

Brendan Carr  
Commissioner

The Honorable Frank Pallone  
237 Cannon House Office Building  
Washington, DC 20515

Dear Congressman Pallone:

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Federal Communications Commission  
Washington, D.C. 20554

May 21, 2018

Brendan Carr  
Commissioner

The Honorable Raul Ruiz  
1319 Longworth House Office Building  
Washington, DC 20515

Dear Congressman Ruiz:

Thank you for your letter concerning the *Accelerating Wireless Broadband Deployment* Second Report and Order, which the Commission approved in March. I appreciate your reaching out to me on this issue.

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 1, 2018

The Honorable Frank Pallone  
Ranking Member  
Committee on Energy and Commerce  
U.S. House of Representatives  
2322A Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Pallone:

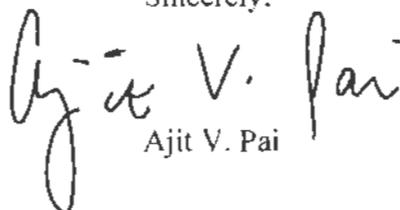
Thank you for your letter regarding the recent reports of cell-site simulators operating in the Washington, D.C. area. I share your concern that cell-site simulators may be used unlawfully by foreign actors and continue to monitor reports of their use.

The Department of Homeland Security has taken the lead in assessing the potential threat from certain uses of cell-site simulators. For example, the Department's April 2017 "Study on Mobile Device Security" identified cell-site simulators as an existing and emerging threat. And the Department's National Protection and Programs Directorate recently confirmed for Senator Wyden that it continues to assess the national security risks and vulnerabilities associated with cell-site simulators, as well as methods to mitigate such risks. The Commission stands ready to aid our federal partners at the Department of Homeland Security, the Department of Justice, and the Federal Bureau of Investigation in addressing this issue. If we had particularized evidence that certain devices were being unlawfully used within the United States, we would of course investigate the matter alongside our federal partners and take all appropriate enforcement actions.

Just as with all other devices that use radio frequency spectrum, cell-site simulators must meet our technical requirements for radio emissions. We continue to strictly limit the distribution of such devices within the United States, limiting their marketing and sale to federal, state, and local law enforcement officials and only after such use is coordinated in advance with the Federal Bureau of Investigation. Here too, if we had particularized evidence that certain devices were being unlawfully marketed or sold to foreign actors within the United States, we would investigate the matter alongside our federal partners and take all appropriate enforcement actions.

Please let me know if I can be of any further assistance.

Sincerely,

  
Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 1, 2018

The Honorable Bennie Thompson  
Ranking Member  
Committee on Homeland Security  
U.S. House of Representatives  
H2-117 Ford House Office Building  
Washington, D.C. 20515

Dear Congressman Thompson:

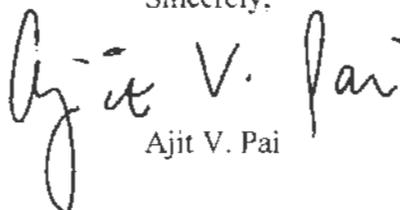
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Sincerely,

  
Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

OFFICE OF  
THE CHAIRMAN

June 1, 2018

The Honorable Eliot L. Engel  
Ranking Member  
Committee on Foreign Affairs  
U.S. House of Representatives  
B360 Rayburn House Office Building  
Washington, D.C. 20515

Dear Congressman Engel:

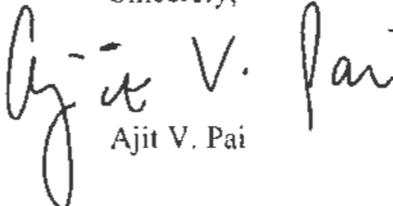
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Please let me know if I can be of any further assistance.

Sincerely,

  
Ajit V. Pai



OFFICE OF  
THE CHAIRMAN

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON

April 27, 2018

The Honorable Debbie Dingell  
U.S. House of Representatives  
116 Cannon House Office Building  
Washington, D.C. 20515

Dear Congresswoman Dingell:

Thank you for your letter regarding the possible acquisition and use of subscriber data by Cambridge Analytica. Specifically, you reference two articles detailing allegations that cross-platform analytics company ComScore, direct broadcast satellite company DISH, and set-top box maker TiVo may have given Cambridge Analytica, as you put it, “the specific viewing habits of many subscribers in the United States.”<sup>1</sup>

You request that the Commission commence an investigation into these allegations for possible violations of Sections 338(i) and 631 of the Communications Act. With a few exceptions not relevant here, these provisions generally prohibit satellite and cable operators from disclosing a subscriber’s personally identifiable information (PII) without the prior written or electronic consent of that subscriber, although Congress specified that the definition of PII in each section “does not include any record of aggregate data which does not identify particular persons.”<sup>2</sup> Notably, these statutory provisions provide subscribers with a private right of action to file claims in U.S. District Court.

Given the FCC’s limited authority in this area—neither TiVo nor ComScore is a satellite or cable operator and it is unclear whether DISH shared individual PII or only “aggregate data which does not identify particular persons”—I believe the appropriate investigatory authority is not the Federal Communications Commission but instead the Federal Trade Commission. As our nation’s premier privacy cop on the beat, the FTC has already announced that it will examine Facebook’s conduct with respect to Cambridge Analytica. Accordingly, I have therefore forwarded your inquiry to my counterpart there to examine further. I am sure this inquiry will be in good hands, given our sister agency’s well-established record of protecting consumers’ privacy and mandate to examine potentially unfair and deceptive trade practices.

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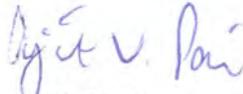
<sup>1</sup> See John Tsarpalas, Voter Analytics with Brittany Kaiser CW 51-Transcript, *Commonwealthy*, <https://www.commonwealthy.com/voter-analytics-transcript/> (Mar. 29, 2016); Ann Marlowe, Trump’s Data Gurus Are Now Turning Their Attention To Your TV, *Fast Company*, <https://www.fastcompany.com/40477438/cambridge-analytica-has-your-tv-in-mind-and-an-unlikely-ally> (Nov. 15, 2017).

<sup>2</sup> 47 U.S.C. § 338(i)(2)(A); 47 U.S.C. § 551(a)(2)(A).

Page 2—The Honorable Debbie Dingell

I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,



Ajit V. Pai