

**STATEMENT OF
COMMISSIONER ANNA GOMEZ**

Re: *Lifeline and Link Up Reform and Modernization; Bridging the Digital Divide for Low-Income Consumers; Telecommunications Carriers Eligible for Universal Service Support; Affordable Connectivity Program; Emergency Broadband Benefit Program*, WC Docket Nos. 11-42, 17-287, 09-197, 21-450, 20-445, Notice of Proposed Rulemaking (February 18, 2026).

Connectivity should be treated as an essential service, not used as a political tool. The biggest barrier to closing the digital divide today is affordability.¹ We should be focused on making communications more affordable for families across the country to ensure that more people are connected and equipped with the tools they need to get a job, earn a living, receive an education, access healthcare, receive emergency services, and participate in civic life.

Instead, this item proposes significant changes that will unnecessarily weaken the Lifeline program and undermine its ability to ensure affordable connectivity for consumers under the guise of preventing waste, fraud, and abuse. Now, when it comes to federal funds, I strongly support improving program integrity and holding providers and administrators accountable where fraud occurs, but not at the expense of those that Lifeline is intended to serve. I refuse to support measures that erect barriers to enrollment for eligible households in ways that the record has not demonstrated are necessary. This is especially troubling because \$9.25 per month is not sufficient support to begin with. Rather than nickel and diming families, we should be discussing how to expand the program and provide greater support for affordability modeled after the success of the Affordable Connectivity Program (ACP). I welcome comment on ways that the Lifeline program can be strengthened and expanded to benefit consumers who need connectivity for telehealth, disability accommodations, emergency response, and more.

I want to acknowledge that this item does ask some helpful questions about the FCC Inspector General's (IG) specific recommendations for addressing actual instances of fraud due to enrollment of deceased individuals and duplicate enrollment. I concur in part with respect to these sections of the item. I would like to acknowledge the Wireline Competition Bureau for their work on this item, and I thank the Chair's office for working with me on edits to improve the item.

Now, I want to turn to the item's proposals that will make it harder for low-income consumers to access Lifeline benefits. Section 254 of the Communications Act directs the Commission to ensure that low-income consumers have access to advanced telecommunications and information services at just, reasonable, and affordable rates.² This requires us to balance program integrity with our obligation to provide consumers with meaningful access to affordable connectivity.

Paring down the program to reduce the number of eligible households that participate in the program in an effort to bring down the Universal Service Fund (USF) contributions factor fundamentally misunderstands and undermines compliance with Congress' direction to the FCC

¹ Kelly Wert, *Every State Identifies Broadband Affordability as Primary Barrier to Closing Digital Divide*, Pew Charitable Trusts (Oct. 4, 2024), <https://www.pew.org/en/research-and-analysis/articles/2024/10/04/every-state-identifies-broadband-affordability-as-primary-barrier-to-closing-digital-divide>.

² 47 U.S.C. § 254(b).

to provide universal service. In the Telecommunications Act of 1996, Congress provided the Commission with guiding principles for universal service policy.³ These included promoting the availability of quality services at just, reasonable, and affordable rates for all consumers; increasing nationwide access to advanced telecommunications services; and advancing the availability of such services to all consumers, including those in low-income, rural, insular, and high-cost areas, at rates that are reasonably comparable with those charged in urban areas.⁴ For over four decades, Commissioners of this agency on a bipartisan basis have recognized the important role that the Universal Service Fund and Lifeline in particular play in ensuring affordable connectivity for low income consumers.

Turning our backs on low-income consumers now shows not only a defiance of Congress' mandate, but also utter disregard for the state of today's economy. Americans today are struggling to afford daily life,⁵ with nearly half the country saying they find groceries, utility bills, health care, housing, and transportation difficult to afford.⁶ This Administration's policy choices have failed across the board to deliver on the promise of affordability. This Administration has made significant cuts to SNAP and instituted tariffs that have increased grocery prices.⁷ They have made significant cuts to Medicaid that have increased healthcare costs.⁸ They have advocated for cuts to federal rental assistance, despite projections that rent prices will continue to rise.⁹ They have made cuts in the education space to federal work study programs, financial aid programs for low income students, and have established barriers for student loan borrowers that force them to repay loans before they can afford to do so.¹⁰ They have decreased investments in energy and proposed eliminating the federal program that provides assistance to millions of low-income households to afford their energy bills.¹¹ The proposal before us is just the next move in a systemic effort by this Administration to eviscerate federal support for low income consumers across the country. This is not a war on poverty. It is a war on the poor.

Empty promises of trickle-down economics leading to marginally lower phone bills is of little comfort to the households who will no longer be eligible for Lifeline support and who will unequivocally face higher phone and internet bills despite already struggling to make ends meet. This is especially troubling in the wake of the lapse of funding for the Affordable Connectivity

³ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (codified at 47 U.S.C. § 151 *et seq.*) (1996 Act).

⁴ CRS, The Universal Service: Fund and Related FCC Broadband Programs: Overview and Considerations for Congress (2026), <https://www.congress.gov/crs-product/R47621>.

⁵ Erin Doherty, *New poll paints a grim picture of a nation under financial strain*, Politico (Dec. 10, 2025), <https://www.politico.com/news/2025/12/10/poll-affordability-cost-of-living-00678076?nid=0000014f-1646-d88f-a1cf-5f46b7bd0000&nname=playbook&nrid=0000014e-f0f5-dd93-ad7f-f8f57f8d0000>.

⁶ Politico Poll, 2025 November – Affordability Crisis (2025), <https://www.politico.com/f/?id=0000019b-0a15-d5ec-abb-da97ce7a0000>.

⁷ Brendan Duke, *Trump Administration, Congressional Republicans Are Worsening Affordability Challenges in Many Ways*, Center on Budget and Policy Priorities (Dec. 18, 2025), <https://www.cbpp.org/research/poverty-and-inequality/trump-administration-congressional-republicans-are-worsening>.

⁸ *Id.*

⁹ Joint Center for Housing Studies of Harvard University, 2025 The State of the Nation's Housing at 31 (2025), https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_The_State_of_the_Nations_Housing_2025.pdf.

¹⁰ Duke, *supra* note 7.

¹¹ *Id.*

Program which left millions of households without \$30 in monthly support on which they had previously relied to get and stay connected. An estimated five million households lost their internet connection altogether when the program ended.¹² Others have had to make difficult and unimaginable choices. Nearly 40% of those previously enrolled in ACP said they had to reduce spending on food to afford connectivity.¹³ 41% said they had to cut back on clothing, heat, and doctor's visits.¹⁴ 18% said their kids had difficulty completing homework assignments.¹⁵ In the absence of ACP, Lifeline has served as the only remaining resource for families struggling to afford connectivity. 78% of Lifeline subscribers say they cannot afford a Lifeline co-pay of \$10 per month.¹⁶ This item threatens to exacerbate the affordability issues and difficult choices that families will have to make in order to stay connected and will undoubtedly leave some families behind altogether.

Aside from the direct impact on households, this item also ignores the overall economic impact of failing to invest in affordability. Prioritizing affordable connectivity means investing in the next generation of Americans and ensuring they have the tools to participate in and contribute to our digital economy. As of 2024, 28.2 million American households did not have access to high-speed broadband, 18 million of which were not connected because they could not afford it.¹⁷ Ultimately, what makes the difference between a household adopting broadband and choosing not to is their ability to pay for the service.¹⁸ Broadband affordability and subsequent adoption have significant impacts on the economy. A 10% increase in broadband adoption can lead to a 1.2% increase in per capita GDP growth.¹⁹ The economic benefits are also visible across various sectors. Telemedicine significantly reduces healthcare costs for both patients and providers. For example, telehealth visits with medical specialists average \$120 less, and virtual urgent-care visits save \$141 compared to in-person urgent care clinic visits.²⁰ The Veterans Health Administration has also determined that patients participating in telehealth saved

¹² Joe Supan, *Less Food and Doctors' Visits: How People Kept the Internet on After ACP Ended*, CNET (Feb. 24, 2025), <https://www.cnet.com/home/internet/less-food-doctors-visits-how-people-kept-the-internet-on-after-acp-ended/>.

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ Adrienne B. Furniss, *The Importance and Effectiveness of the Lifeline Program*, Benton Institute for Broadband & Society (Aug. 28, 2023), <https://www.benton.org/blog/importance-and-effectiveness-lifeline-program>.

¹⁷ Education Superhighway, *A Broadband Affordability Benefit to Connect the Unconnected* (2024), <https://www.educationsuperhighway.org/no-home-left-offline/broadband-benefit/>; Federal Reserve Bank of New York, *Broadband Affordability: Assessing the Cost of Broadband for Low-and-Moderate Income Communities in Cities at 3* (Sept. 2025), <https://www.newyorkfed.org/medialibrary/media/outreach-and-education/household-financial-stability/assessing-cost-of-broadband-for-low-and-moderate-income-communities>.

¹⁸ Colin Rhinesmith, Bianca Reisdorf, & Madison Bishop, *The Ability to Pay for Broadband*, 5(2) *Communication Research and Practice* 121–138 (2019), <https://doi.org/10.1080/22041451.2019.1601491>.

¹⁹ ITU, *The Impact of Broadband on the Economy: Research to Date and Policy Issues* (2012), https://www.itu.int/ITU-D/treg/broadband/ITU-BB-Reports_Impact-of-Broadband-on-the-Economy.pdf.

²⁰ Coleman Bazelon, Paroma Sanyal, & Yong Paek, *Paying for Itself: How the Affordable Connectivity Program Delivers More Than It Costs*, Brattle Group (Feb. 19, 2025), <https://www.brattle.com/wp-content/uploads/2025/02/Paying-for-Itself-How-the-Affordable-Connectivity-Program-Delivers-More-Than-It-Costs.pdf>; see Blair Levin, *Ten Things About ACP that Ted Cruz Cares About #2 The Economic Benefit of ACP to the Health Care System*, Benton Institute for Broadband & Society (June 5, 2024), <https://www.benton.org/blog/ten-things-about-acp-ted-cruz-cares-about-2-economic-benefit-acp-health-care-system>.

thousands of dollars per year in federal funds.²¹ Increased broadband access has also been linked to better individual academic performance and increases in lifetime earnings potential.²² Broadband also has a positive impact on employment.²³ Universal broadband access would lead to a 1.1% increase in U.S. labor productivity or GDP gains of \$160 billion per year.²⁴ The economic and social benefits of affordable connectivity should be part of our cost-benefit analysis when making changes to the Lifeline program.

Some of the item's proposals rely on the claim that approximately two million individuals were unlawfully assigned Social Security numbers in 2024. However, the item does not even assert that any of those individuals were enrolled in Lifeline or that their participation in the program led to quantifiable losses. I welcome input from outside parties on how significant an issue illegally assigned Social Security Numbers is within the Lifeline program and whether any of the proposed actions would address the issue.

The Inspector General's findings regarding Lifeline integrity focused overwhelmingly on administrative deficiencies and provider and agent misconduct, not subscriber eligibility.²⁵ The IG's advisory specifically focused on incidences of fraud in California, Texas, and Oregon, the three states that opted out of using the National Lifeline Accountability Database (NLAD or national verifier).²⁶

This FCC has been intent on politicizing the IG's findings to malign California's state leaders who are perceived political enemies of this Administration. So, I want to be clear about what the data actually tells us. It is important to understand that California has a higher participation rate for its eligible households in the Lifeline program than Texas. The IG found that the rate of fraud in Texas was far higher than it was in California.²⁷ The percentage of total subscribers in Texas that were deceased was more than one and a half times the percentage of total subscribers in California that were deceased.²⁸ The FCC focused on the absolute number of deceased subscribers to score political points while ignoring the actual rate of fraud.

Fraud of any kind in a federal program is a serious problem the Commission should address. However, we must do so honestly and in a way that targets the root cause of fraud without taking support away from eligible households.

²¹ American Hospital Association, *Telehealth: Helping Hospitals Deliver Cost-Effective Care* (2016), <https://www.aha.org/system/files/content/16/16telehealthissuebrief.pdf>.

²² Bazelon, Sanyal, & Paek, *supra* note 20.

²³ Raul L. Katz, "The Impact of the Broadband Internet on Employment," in *Digitized Labor* 95–108 (2018), https://link.springer.com/chapter/10.1007/978-3-319-78420-5_6.

²⁴ Bazelon, Sanyal, & Paek, *supra* note 20.

²⁵ FCC Office of Inspector General, *Advisory Regarding Deceased and Duplicate Lifeline Subscribers at 9* (2026), <https://www.fcc.gov/sites/default/files/FCC%20OIG%20Advisory%20Regarding%20Deceased%20and%20Duplicate%20Lifeline%20Subscribers.pdf>.

²⁶ *Id.* at 4.

²⁷ *Id.* at 4; Universal Service Administrative Company, *Program Data*, <https://www.usac.org/lifeline/resources/program-data/#Participation> (last visited Feb. 19, 2026).

²⁸ Calculations were made using 2026 FCC OIG Advisory data and 2025 Lifeline Program participation data from USAC's website. Percentage of total Texas subscribers that were deceased subscribers: 20,350 deceased TX subscribers / 221,783 total TX subscribers (2025) = 0.092. Percentage of total California subscribers that were deceased subscribers: 94,596 deceased CA subscribers / 1,721,461 total CA subscribers (2025) = 0.055. 0.092 (TX) / 0.055 (CA) = 1.67. 1.67 > 1.5. FCC Office of Inspector General, *supra* note 25; Universal Service Administrative Company, *supra* note 27.

The IG's recommendations for addressing fraud were narrowly tailored to directly address two key issues: enrollment of deceased individuals and duplicate enrollment. The IG did not recommend raising eligibility thresholds or imposing additional burdens on consumers. Punishing eligible families fundamentally misdiagnoses the problem and risks undermining a program designed to help low-income households stay connected.

I welcome comment on how the Commission can improve transparency within the Lifeline program through reporting mechanisms and whether there are best practices from other federal or state programs that the Commission can adopt to improve transparency, accountability, and stakeholder engagement within the Lifeline program.

We should examine what this item's proposals would do to participation in the program. Though a secondary consent verification process sounds good on paper, in practice it creates more friction in the enrollment and transfer processes. Research across public benefit programs shows that even small procedural hurdles can materially reduce participation among eligible populations²⁹—particularly among individuals with unstable housing, no pre-existing connectivity, limited digital literacy, or inconsistent device access. I ask stakeholders to comment on the factors that most significantly impede Lifeline enrollment among eligible households and how these barriers can be addressed.

As of 2021, more than 33 million households qualify for Lifeline, but only 20% are enrolled.³⁰ That is not evidence of rampant abuse, it is evidence of a program that is already under-reaching those that Congress intended it to serve. A smaller percentage of eligible people utilize Lifeline compared to most other federal benefit programs.³¹ By comparison, Medicaid has a participation rate of 84.1% and SNAP has a participation rate of 51.6%.³² Our response to addressing fraud should not be to unnecessarily increase the difficulty for consumers to enroll in Lifeline.

The proposal to turn the one-per-household eligibility threshold into a one-per-residence requirement is cruel and punitive. It reflects a lack of knowledge about the experience of being poor. Rather than going after administrative deficiencies and provider misconduct, it focuses on narrowing eligibility and reducing the number of households participating in the program. At a time when homelessness has hit a record high,³³ this policy is all the more concerning.

Government entities like the Social Security Administration have made accommodations to ensure that the unhoused and those without a stable address for other reasons can still receive

²⁹ Ashley Fox, Wenhui Feng, & Megan Reynolds, *The Effect of Administrative Burden on State Safety-Net Participation: Evidence From Food Assistance, Cash Assistance, and Medicaid*, 83(2) Public Administration Review (2022), https://www.researchgate.net/publication/360692134_The_Effect_of_Administrative_Burden_on_State_Safety-Net_Participation_Evidence_from_SNAP_TANF_and_Medicaid#read; Sarah Fentem, *Barriers block SNAP and Medicaid users from keeping vital benefits, survey finds*, St. Louis Public Radio (Nov. 17, 2025), <https://www.stlpr.org/health-science-environment/2025-11-17/barriers-block-snap-and-medicaid-users-from-keeping-vital-benefits-survey-finds>.

³⁰ Furniss, *supra* note 16.

³¹ *Id.*

³² *Id.*

³³ Daniel Soucy, Andrew Hall, & Joy Moses, *State of Homelessness: 2025 Edition*, National Alliance to End Homelessness (Sept. 4, 2025), <https://endhomelessness.org/state-of-homelessness/#report>.

benefits.³⁴ Instead of modernizing the Lifeline program to provide similar assistance to people who need it most, the FCC proposes to reduce eligibility for those who live in multi-generational or multi-family households, have addresses on Tribal lands, live in group homes, or are unhoused. A one-per-residence requirement will strip affordability support away from those who do not have a stable address and those living at the same address as multiple other eligible households.

The impact of this policy is inherently discriminatory. Among racial and ethnic groups, Asian, Black, and Hispanic Americans are far more likely than White Americans to live in multi-generational households.³⁵ About a quarter of Asian (24%), Black (26%) and Hispanic (26%) Americans lived in multigenerational households in 2021, compared with 13% of those who are White.³⁶ Moreover, indigenous people experience homelessness at nearly five times the rate of others in the United States.³⁷ Taking support away from these vulnerable populations is inequitable and indefensible.

The Commission fails to demonstrate how narrowing eligibility for the program and erecting barriers to enrollment will help address the Inspector General's findings of fraud. It also fails to justify how its proposals will improve fiscal outcomes relative to administrative burdens and costs.

The proposal to apply the restrictions of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) to the Lifeline program is largely an administrative redundancy and poses a risk of erroneous deprivation of benefits. The vast majority of participants qualify for Lifeline through SNAP or Medicaid—programs that already incorporate the PRWORA eligibility verification standards, including the five-year waiting period. The item proposes using scarce Universal Service dollars to pay to use the Department of Homeland Security's (DHS) Systematic Alien Verification for Entitlements (SAVE) database to verify the eligibility of legal immigrants, duplicating the verification carried out by other programs through which consumers qualify for Lifeline. I welcome input on the number of current Lifeline subscribers that are likely to be removed from the program due to application of the PRWORA's five-year waiting period. The Inspector General made clear that the Treasury's Do Not Pay database, which can be used by the FCC free of charge, is an adequate tool for identifying deceased individuals and preventing their enrollment in the program, addressing the real source of fraud. Instead, the proposal seeks to take federal funds out of the Universal Service Fund, that should be going to consumers, to pursue verification completely untethered to any identified source of fraud. Every dollar spent on administrative barriers is a dollar not directed toward supporting affordability for eligible recipients.

In addition to creating a redundant, costly, and administratively burdensome effort, the use of DHS' SAVE database is also highly concerning because the database itself has serious

³⁴ SSA, Understanding Supplemental Security Income Living Arrangements – 2025 Edition, <https://www.ssa.gov/ssi/text-living-ussi.htm>.

³⁵ Pew Research Center, Financial Issues Top the List of Reasons U.S. Adults Live in Multigenerational Homes (Mar. 24, 2022), <https://www.pewresearch.org/social-trends/2022/03/24/the-demographics-of-multigenerational-households/>.

³⁶ *Id.*

³⁷ National League of Cities, *Housing for Indigenous Peoples & Tribal Nations* (Nov. 29, 2022), <https://www.nlc.org/article/2022/11/29/housing-for-indigenous-peoples-tribal-nations/>.

integrity issues. A recent report by ProPublica and the Texas Tribune found that the SAVE database has alarming inaccuracies.³⁸ In places such as Denton County, Texas and Boone County, Missouri that have started using the SAVE database to verify citizenship status, local government officials have found that the database has out-of-date information and often misidentifies citizens as non-citizens.³⁹ The FCC proposal to use this database poses a significant risk of erroneously depriving eligible Lifeline subscribers of their benefits.

Moreover, any time the SAVE database flags an individual as a noncitizen, even when it does so inaccurately, the individual may be referred to DHS for immigration enforcement purposes. The FCC's use of a database with such inaccuracies to flag targets for immigration enforcement raises serious concerns.

It is difficult to ignore the partisan undertones of immigration-related policy proposals that are untethered to demonstrated program integrity issues. As an independent agency, the FCC should not be weaponizing its regulatory authority to advance unrelated immigration policies to score points with this Administration, particularly when doing so conflicts with the expertise and institutional knowledge of the agency. And importantly, erecting barriers to the Lifeline program exemplifies a failure to ensure affordability that will disproportionately impact those who need this support the most, deepening existing economic and social inequalities across the country. For these reasons, I concur in part and dissent in part.

³⁸ Jen Fifield & Zach Despart, "Not Ready for Prime Time." *A Federal Tool to Check Voter Citizenship Keeps Making Mistakes.*, ProPublica & Texas Tribune (Feb. 13, 2026), <https://www.propublica.org/article/save-voter-citizenship-tool-mistakes-confusion>.

³⁹ *Id.*