The Honorable Ajit Pai, Chairman  
The Honorable Mignon Clyburn, Commissioner  
The Honorable Michael O’Rielly, Commissioner  
The Honorable Brendan Carr, Commissioner  
The Honorable Jessica Rosenworcel, Commissioner  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Bridging the Digital Divide for Low-Income Consumer WC Docket No. 17-287; Lifeline Link Up Reform and Modernization WC Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service WC Docket No. 09-197

Dear Chairman Pai, Commissioners Clyburn, O’Rielly, Carr, and Rosenworcel,

The organizations below respectfully ask you not to move forward with the proposed Notice of Proposed Rulemaking (NPRM) concerning the Lifeline program. We are very concerned about the direction of the proposed reforms. In fact, the proposed reforms of the Lifeline program could make it impossible for many low-income consumers to obtain access to affordable broadband services.

Schools, libraries, health care providers and other community anchor institutions are strong supporters of digital equity. Many anchor institutions are working with their communities to promote digital literacy, close the homework gap, and promote telemedicine to the home. The NPRM’s proposals to eliminate the option for consumers to purchase broadband-only service, to place an arbitrary cap on the size of the Lifeline program, to exclude resellers, and other proposed changes will widen the digital divide rather than closing it.

Our organizations stand ready to work with the Federal Communications Commission to improve the operation and effectiveness of the Lifeline program. We understand that there are concerns about abuse of the program, and we believe that establishing the National Verifier and adopting other safeguards will restore the integrity of the program. But revamping the Lifeline program to focus on the build-out of networks rather than providing discounted service to low-income Americans would turn the program on its head. We urge you to vote against the NPRM or amend it to focus on rectifying the problems with the Lifeline program without jeopardizing the opportunity of millions of Americans to subscribe to affordable broadband service.

Sincerely,

John Windhausen, Jr.  
Schools, Health & Libraries Broadband (SHLB) Coalition

Kevin Taglang  
Benton Foundation
Sean McLaughlin
Access Humboldt

Janice Meyers
Janice Meyers Consulting

Jane Kellogg
Kellogg & Sovereign Consulting, LLC

Susan Bearden
Susan Bearden Consulting

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Andrea Bennet
California Educational Technology Professionals Association (CETPA)