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April 13, 2016

The Honorable Greg Walden
2186 Rayburn House Office Building
Washington, DC 20515

The Honorable Anna Eshoo
241 Cannon House Office Building
Washington, DC 20515

Dear Congressman Walden and Congresswoman Eshoo:

The Multicultural Media, Telecom and Internet Council (“MMTC”) respectfully submits this letter to express our concern about the proposals included in H.R. 4884, Controlling the Unchecked and Reckless Ballooning of the Lifeline Fund Act (“CURB Lifeline Act 2015”). Our concerns are focused on the two-year phase out of mobile voice as an eligible service and the proposal of a hard cap on the Lifeline program budget. We also provide feedback on H.R. 3998, Securing Access to Networks in Disasters Act (“SANDy Act”).

On March 24, 2016, fourteen civil rights organizations, including MMTC, sent a letter to the Federal Communications Commission (“the Commission”) requesting that newly adopted Lifeline program rules embrace and support multiple technologies so that the nation’s neediest communities can reach parity with the rest of the nation in terms of broadband infrastructure.¹ Our organizations also called on the Commission to be cautious in the establishment of new minimum standards for mobile voice services, coupled with the immediate reduction and eventual elimination of available support for mobile voice services. We continue to maintain that removing support for mobile voice will potentially price out the very people that the Lifeline program is seeking to support. Consequently, we urge that Congress not mandate the phase-out of mobile voice-only service within two years of enactment. Historically disadvantaged consumers, such as low-income populations, seniors, the disabled, and others, have demonstrated their reliance on wireless voice services as their primary “lifeline” to communications services and a road out of poverty. As MMTC has shared with the Commission, access to broadband services must be more ubiquitous before redirecting the subsidy toward broadband-only services for these vulnerable populations.

MMTC also does not support a hard budget cap for the Lifeline program. Rather, we believe that the Commission should work to improve program administration and institute a National Third Party Verifier to eliminate waste, fraud, and abuse. In MMTC’s White Paper, we identified several areas where program changes could actually generate cost savings and value

¹ See, NICOL TURNER-LEE ET AL., LIFELINE TO HIGH SPEED-INTERNET ACCESS: AN ECONOMIC ANALYSIS OF ADMINISTRATIVE COSTS AND THE IMPACT ON CONSUMERS (Multicultural Media, Internet and Telecom Council) (2016), available at <http://mmtconline/WhitePapers/March2016-Lifeline-Analysis-Consumer-Impact.pdf> (last visited Mar 25, 2016).



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to the program, thereby accommodating the adoption of broadband as an eligible service. In our view, the adoption of a hard cap will make it more difficult to expand the reach of the program to consumers most in need of modernized Lifeline services and would interfere with the FCC's goal of creating a more competitive Lifeline marketplace. Moreover, a hard cap will not align the program with other means-tested social service programs, such as the Supplemental Nutrition Assistance Program (SNAP) and others, where access to Lifeline can not only bolster the benefit, but also lead to social dividends as more of these applicants attain the resources and life-skills to become more self-sufficient. Given these reasons, MMTC urges Congress to avoid hard budget caps on the Lifeline program, and instead allow the program to grow into a more desirable opportunity for eligible, low-income consumers.

Finally, MMTC is pleased to voice its support for Congressman Pallone's proposed SANDy Act with one revision. We support any and all efforts to ensure that the communications structure remains intact before, during, and after emergencies, especially in natural disasters that have the potential to break apart families and unravel access to essential needs, including housing, food, and medical care. MMTC further requests that Congress encourage the wireless industry to publish consumer education materials in multiple languages in both traditional and social media. It is critically important as the nation experiences a shift in its demographics that government and the private sector adopt policies that promote diversity and inclusion.

MMTC appreciates the opportunity to contribute our voice to this review and record of pending legislation.

Sincerely,

A handwritten signature in black ink, appearing to be "K. Keenan", written in a cursive style.

Kim Keenan
President and CEO

¹ See, NICOL TURNER-LEE ET AL., LIFELINE TO HIGH SPEED-INTERNET ACCESS: AN ECONOMIC ANALYSIS OF ADMINISTRATIVE COSTS AND THE IMPACT ON CONSUMERS (Multicultural Media, Internet and Telecom Council) (2016), available at <http://mmtconline/WhitePapers/March2016-Lifeline-Analysis-Consumer-Impact.pdf> (last visited Mar 25, 2016).