

September 12, 2013

The Honorable Fred Upton, Chairman
Committee on Energy and Commerce
United States House of Representatives
Washington, D.C. 20515

The Honorable Henry Waxman, Ranking Member
Committee on Energy and Commerce
United States House of Representatives
Washington, D.C. 20515

Dear Chairman Upton and Ranking Member Waxman:

We represent a diverse coalition of public interest, civil rights, religious, and community-based organizations — from across the country — working on issues related to the media, telecommunications, technology, and social justice. We write to underscore the significance to our communities of the Lifeline Program, which provides a modest subsidy to low-income consumers to pay for basic telephone service. We urge you to support this vital program.

Our nation's communications policy is based on the fundamental principle of universal service for good reason: people need affordable communications services to connect to the outside world for job opportunities, medical services, educational advancement, and civic participation. The Lifeline Program is an essential component of our nation's Universal Service program, complementing the other Universal Service programs that support service for rural and hard-to-reach areas, as well as schools and libraries.

Thanks to Lifeline, some members of our most vulnerable and disadvantaged populations are able to maintain telephone service when their incomes would not otherwise cover this necessity. Ensuring access to affordable communications services is not a partisan issue. The program was initiated during Ronald Reagan's administration and later expanded under the George W. Bush administration to cover wireless service in the aftermath of Hurricane Katrina.

Recent media attention has focused almost exclusively on perceptions of abuse and fraud in the Lifeline Program. These sensational stories gain traction because they exacerbate and exploit stereotypes about the individuals who use the program. But these allegations of abuse and fraud are exceptions, and it's important to keep in mind the many deserving subscribers and communities currently relying on this vital resource, which disproportionately includes seniors, people with disabilities, veterans, rural residents, Native Americans, communities of color, and struggling families. Lifeline users depend on the program to access economic opportunities and emergency services — and to escape the circumstances that made them eligible for the program in the first place.

Critics' proposals to limit the program's coverage or eliminate the program entirely are ill-conceived. The reforms adopted by the Federal Communications Commission in 2012, and the additional guidance offered more recently, must be given time to be fully implemented so that their efficacy can be accurately assessed. These reforms, which include clear mandates for carriers to identify the phone service as a Lifeline service, uniform procedures to confirm

eligibility of program participants, and automated mechanisms to avoid duplications have already begun to address the identified abuses and will make the program more efficient.

As public interest, civil rights, faith-based, and community advocates, we, too, have an interest in seeing the efficient and effective use of the money collected from consumers for the Universal Service Fund. We believe the solution is to continue to enforce the rules of the reformed program to eliminate fraud and penalize those who abuse the program, including especially companies that fail to comply with the stricter Lifeline rules. While improving the program, however, we must continue to serve the individuals who need Lifeline most.

Thank you for your consideration.

Respectfully,

Access Humboldt
AdvoCare, Inc.
AFL-CIO
American Civil Liberties Union
Appalshop, Inc.
Art is Change
Asian Americans Advancing Justice | AAJC
AVANCE National
Benton Foundation¹
Center for Accessible Technology
Center for Media Justice (CMJ)
Center for Rural Strategies
Coalition on Human Needs
Common Cause
Community Media Workshop
Consumer Action
Consumer Federation of America
Consumers Union
Cuban American National Council, Inc. (CNC)
Disciples Justice Action Network
Ecumenical Poverty Initiative (Disciples Center for Public Witness)
Edgemont Neighborhood Coalition of Dayton Ohio
Esperanza Peace and Justice Center
Free Press Action Fund
Global Action Project
The Greenlining Institute
Highlander Research and Education Center
Hispanic Association of Colleges and Universities (HACU)
Hispanic Federation
Homeless Action Center

¹ The Benton Foundation is a nonprofit organization dedicated to promoting communication in the public interest. These comments reflect the institutional view of the Foundation and, unless obvious from the text, are not intended to reflect the views of individual Foundation officers, directors, or advisors.

Institute for Local Self-Reliance
Instituto de Educacion Popular del Sur de California
Iraq Veterans Against the War
KFAI Radio
The Leadership Conference on Civil and Human Rights
Line Break Media
LULAC, League of United Latin American Citizens
Main Street Project
MANA, A National Latina Organization
Martinez Street Women's Center
Media Action Grassroots Network (MAG-Net)
Media Alliance
Media Literacy Project
Media Mobilizing Project
Mexican American Legal Defense and Education Fund (MALDEF)
Missouri Association for Social Welfare (MASW)
NAACP
National Alliance of Latin American & Caribbean Communities (NALACC)
National Association of American Veterans, Inc.
National Association of Hispanic Federal Executives (NAHFE)
National Consumer Law Center, on behalf of its low-income clients
National Council of La Raza (NCLR)
National Hispanic Council on Aging
National Hispanic Media Coalition (NHMC)
National Hispanic Medical Association (NHMA)
National Latina Institute for Reproductive Health
National Puerto Rican Coalition (NPRC)
National Urban League
Native Public Media
NJ SHARES, Inc.
Ohio Poverty Law Center (OPLC)
Open Access Connections
Open Technology Institute
Pennsylvania Utility Law Project
Pro Seniors, Inc.
Prosperity Works
Public Knowledge
Public Utility Law Project of New York, Inc.
Saint Paul Neighborhood Network
SER – Jobs for Progress National, Inc.
Springwire
Southern California Tribal Digital Village
Southwest Voter Registration Education Project (SVREP)
Southwest Workers Union
TURN – The Utility Reform Network
United Church of Christ Justice and Witness Ministries
United Church of Christ, OC Inc.
United Methodist Church, General Board of Church and Society

United States Hispanic Leadership Institute (USHLI)
Urbana-Champaign Independent Media Center
Virginia Citizens Consumer Council
Virginia Rural Health Association
William C. Velasquez Institute
Young People's Project