

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Bridging the Digital Divide for Low-Income Consumers	)	WC Docket No. 17-287
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
Affordable Connectivity Program	)	WC Docket No. 21-450
	)	
Emergency Broadband Benefit Program	)	WC Docket No. 20-445

**COMMENTS ON THE NOTICE OF PROPOSED RULEMAKING  
FROM**

**NATIONAL CONSUMER LAW CENTER**

**COMMON SENSE MEDIA**

**COMMUNICATIONS WORKERS OF AMERICA**

**LEADERSHIP CONFERENCE ON CIVIL AND HUMAN RIGHTS**

**MEDIAJUSTICE**

**UNIDOSUS**

**UNITED CHURCH OF CHRIST MEDIA JUSTICE MINISTRY**

TABLE OF CONTENTS

Contents

**I. Introduction**..... 1

**II. Summary**..... 2

**III. Proposed Lifeline Eligibility Determination Process Changes** ..... 4

**A. Lifeline Benefits from the Eligibility Determinations Are Already Performed by Other Federal Programs**..... 4

**B. Added Verification of Immigration Status Duplicates Other Agencies’ Processes**..... 5

**C. The DHS SAVE Program Adds Cost, Administrative Complexity and Has a High Error Rate**. .... 7

**IV. Enrollment and Transfer Processes** ..... 9

**A. The Commission Should Ensure Consumers Have Consented to Enroll into Lifeline or Transfer their Benefit**..... 9

**B. Keep the National Verifier Eligibility Verification at 90 Days to Allow Consumers Time to Select a Lifeline provider**..... 11

**C. Lifeline Consumers Should Retain the Ability to Transfer Their Benefit to Another Provider**. .... 11

**D. Contributions Reform is a Necessary Component to Setting Meaningful Minimum Service Standards**..... 12

**E. The Commission Should End the Voice Support Phase-Down**..... 13

**F. The Commission Should Not Change the One-Per-Household Rule**. .... 13

**V. Promoting Principles for Service Provider Conduct** ..... 15

**A. The Commission Should Adopt Provider Compliance Plan Modifications**..... 15

**B. The Commission Should Require Criminal Background Checks for Enrollment Representatives**. .... 16

**VI. Conclusion** ..... 17

## I. Introduction

These Comments, submitted by the National Consumer Law Center (NCLC)<sup>1</sup> on behalf of its low-income clients, and joined by Common Sense Media<sup>2</sup>, Communications Workers of America (CWA)<sup>3</sup>, the Leadership Conference on Civil and Human Rights<sup>4</sup>, MediaJustice<sup>5</sup>, UnidosUS<sup>6</sup>, and the United Church of Christ Media Justice Ministry<sup>7</sup> (“Low-Income Consumer Advocates”) are submitted in response to the above-captioned Notice of Proposed Rulemaking (NPRM) released by the Federal Communications Commission (Commission or FCC) on February 23, 2026, and published in the Federal Register on April 3, 2026<sup>8</sup>.

---

<sup>1</sup> The nonprofit [National Consumer Law Center® \(NCLC®\)](#) has worked for consumer justice and economic security for low-income and other disadvantaged people in the U.S. through its expertise in policy analysis and advocacy, publications, litigation, expert witness services, and training.

<sup>2</sup> Common Sense Media is an independent nonprofit organization dedicated to helping kids and families thrive in a world of media and technology. We empower parents, teachers, and policymakers by providing reviews, assessments, trusted advice, and innovative tools to help them harness the power of media and technology as a positive force in all kids’ lives. Common Sense Media reaches over 100 million users and one million educators across its networks and platforms. We have a long and established track record of advocating for broadband connectivity for all children and families, in schools and at home, regardless of their socioeconomic status or geographic location.

<sup>3</sup> CWA is a labor union representing workers in telecommunications and technology, including employees who build, upgrade, and service networks in wireline and wireless telecommunications. CWA also represents workers in news media, broadcast and cable television, the airline industry, public service, manufacturing, and other fields. CWA has long supported universal communications services, including the Lifeline program, as a federal policy priority.

<sup>4</sup> The Leadership Conference on Civil and Human Rights is a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the civil and human rights of all persons in the United States.

<sup>5</sup> The Center for Media Justice dba MediaJustice is a non-profit, 501(c)(3) organization established in 2009. It is dedicated to democratizing the economy, government, and society through policies and practices that, among other things, ensure democratic media ownership, fundamental communication rights, and universal media and technology access at affordable prices. MediaJustice has a network of over 100 local, regional, or statewide affiliate social-justice organizations. MediaJustice and its affiliates directly support programs that enable users to obtain more affordable access to communications services and technology, including the Lifeline and E-Rate programs funded by the Universal Service Fund.

<sup>6</sup> UnidosUS is the nation’s largest Latino civil rights and advocacy organization, representing more than 300 affiliated community-based organizations serving millions of Latino families across 37 states, Washington, D.C., and Puerto Rico.

<sup>7</sup> The United Church of Christ Media Justice Ministry, established in 1959 by the mainline protestant denomination the United Church of Christ, advocates for equitable, affordable and accountable media and technology to promote a just world for all.

<sup>8</sup> Lifeline and Link Up Reform and Modernization; Bridging the Digital Divide for Low-Income Consumers; Telecommunications Carriers Eligible for Universal Service Support; Affordable Connectivity

The federal Lifeline program was established in 1985 by the Commission to ensure low-income consumers had access to affordable phone service.<sup>9</sup> In 1996 Congress directed the Commission to base policies for the preservation and advancement of universal service on principles that, among other things, ensure that “Consumers in all regions of the Nation, including low-income consumers . . . have access to telecommunications and information services, including interexchange services and advanced telecommunication and information services”<sup>10</sup> that are “just, reasonable and affordable”<sup>11</sup> and “provided in all regions of the Nation.”<sup>12</sup>

Over decades, the Commission has modernized the Lifeline Program from landline phone service to mobile voice and broadband internet access service (BIAS); refining the support amounts, eligibility processes and program integrity measures to keep pace with the evolving marketplace and consumer needs.<sup>13</sup> This NPRM purports to advance these goals, but it does not.<sup>14</sup> The proposed changes would erect new barriers for eligible consumers and impose greater administrative costs on the Commission without creating meaningful efficiency gains or improved program integrity.<sup>15</sup>

## II. Summary

Low-Income Consumer Advocates oppose modifications to the Lifeline program that limit access and competitive services while imposing duplicative processes that will add unnecessary

---

Program; Emergency Broadband Benefit Program, Notice of Proposed Rulemaking, WC Docket No. 11-42 et al., [91 Fed. Reg. 16871-16893](#) (April 3, 2026) (NPRM).

<sup>9</sup> NPRM at ¶1.

<sup>10</sup> 47 U.S.C. §254(b)(3).

<sup>11</sup> 47 U.S.C. §254(b)(1).

<sup>12</sup> 47 U.S.C. §254(b)(2).

<sup>13</sup> NPRM at ¶¶3-9.

<sup>14</sup> NPRM at ¶2.

<sup>15</sup> These comments do not respond to all the questions posed in the NPRM; we reserve the right to respond to additional questions on reply.

cost and administrative complexities. Low-Income Consumer Advocates are opposed to treating Lifeline as a program under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) because Lifeline provides critical health and safety functions in line with the PRWORA exceptions for emergency medical conditions, emergency disaster relief and services or assistance such as soup kitchens and short-term shelter. Low-Income Consumer Advocates oppose the use of the DHS SAVE system as it exposes the program to legal risk and unnecessary cost.

Low-Income Consumer Advocates support processes to ensure consumers have authorized enrollment in Lifeline or transfer of service, but any additional processes must not disadvantage or harm consumers who lack a device or skill to promptly send secondary verification of consent at time of enrollment. We are also concerned that secondary verification processes to confirm a consumer's transfer of service not impair a consumer's ability to shop around for a better service offering. We propose alternative processes for enrollment and transfer verifications. Low-Income Consumers are also opposed to reducing the time permitted for Lifeline participants to select a provider, as that will harm consumers needing the time to work with a digital navigator or perform research on providers in order to select the best service for their needs. Low-Income Consumer Advocates are opposed to limitations on transferring benefits between providers through a port-freeze or limitations on number portability.

Low-Income Consumer Advocates believe minimum service standards should be addressed in tandem with an increased benefit amount and contributions reform. Regardless, we support eliminating the phase out of voice-only support.

Low-Income Consumer Advocates oppose the proposal to move from a one-per-household rule to a one-per-residence rule. The number of homeless and marginally housed people has been

increasing and doubling up is a survival strategy for families with very low incomes. A one-per-residence rule would limit the reach of Lifeline and cut out people experiencing homelessness and housing insecurity – those who are among the most vulnerable in society and need Lifeline to survive.

Finally, Low-Income Consumer Advocates support a number of the provider compliance plan modifications and criminal background checks for Lifeline enrollment representatives due to the sensitive personal information involved.

### **III. Proposed Lifeline Eligibility Determination Process Changes**

#### **A. Lifeline Benefits from the Eligibility Determinations Are Already Performed by Other Federal Programs.**

Consumers qualify for Lifeline if their income is at or below 135% of the Federal Poverty Guidelines or if they, or their dependents, receive benefits from another listed low-income federal assistance program such as Medicaid, Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), Federal Public Housing Assistance or Veterans and Survivors Pension Benefit.<sup>16</sup> The National Verifier, the centralized process for independent third-party Lifeline eligibility determinations, automates eligibility verifications, where possible, through database connections with federal and state databases for the qualifying programs listed above. The National Verifier has three federal database connections which allow for real-time checks for participation in every state and territory for the Centers for Medicare and Medicaid Services (CMS) Medicaid program; the U.S. Department of Housing and Urban Development (HUD) Federal Public Housing Authority programs, and the U.S. Department of Veterans Affairs' Veterans Pension and Survivors Benefit programs. As of 2025, the National Verifier

---

<sup>16</sup> 47 C.F.R. §54.409 (there are additional qualifying programs for survivors of domestic violence and households living on Tribal lands).

also had 26 state and territory database connections for SNAP, as well as Medicaid and SSI where available.<sup>17</sup> The vast majority, 96 percent, of Lifeline recipients use program participation to verify eligibility for Lifeline.<sup>18</sup> The remaining 4 percent of Lifeline households, almost 313,000, used income documentation to qualify for Lifeline.<sup>19</sup>

#### **B. Added Verification of Immigration Status Duplicates Other Agencies' Processes.<sup>20</sup>**

When Congress set forth the Universal Services principles, it referred to “Consumers, in all regions of the Nation, including low-income consumers” having access to telecommunications and information services,<sup>21</sup> not “citizens.” Congress defined Universal Service as “an evolving level of telecommunications services that the Commission shall establish periodically . . . , taking into account advances in telecommunications and information technologies and services” that “are essential to education, public health, or public safety.”<sup>22</sup> Public health and public safety affect all people in a society, regardless of citizenship. The ability to contact emergency services and receive emergency alerts can save the lives of the Lifeline household and protect life and property in the surrounding communities. Access to essential communication services should not be made contingent on citizenship. Lifeline is truly a lifeline. Society is stronger if all have access to emergency communications.

As noted in the NPRM, the Lifeline benefit is already “available only to citizens and

---

<sup>17</sup> USAC, “National Verifier Annual Report and Data” (Jan. 30, 2026) at 1-2, <https://www.usac.org/wp-content/uploads/lifeline/documents/Data/2026-National-Verifier-Annual-Report-and-Data.pdf>.

<sup>18</sup> See Lifeline program metrics data at slide 79, <https://www.usac.org/wp-content/uploads/about/documents/leadership/materials/hcli/2026/2026.01.26-HCLI-Briefing-Book-Public.pdf> (out of 8,070,767 Lifeline recipients in 2025, 7,758,098 (96%) were auto approved using program eligibility through the federal and state program database connections).

<sup>19</sup> See Lifeline program metrics data at slide 79, <https://www.usac.org/wp-content/uploads/about/documents/leadership/materials/hcli/2026/2026.01.26-HCLI-Briefing-Book-Public.pdf> (8,070,767 total Lifeline households - 7,758,098 program eligibility auto approved = 312,669).

<sup>20</sup> NPRM ¶¶ 28-30.

<sup>21</sup> 47 U.S.C. §254(b)(3).

<sup>22</sup> 47 U.S.C. §254(c)(1).

qualified aliens”<sup>23</sup> and the Lifeline program already requires participants to submit the last four digits of their social security number to apply for Lifeline.<sup>24</sup> Yet, the NPRM proposes to create a finding that Lifeline is a federal public benefit under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) to limit the benefit based on citizenship status. Even PRWORA has exceptions for the treatment of emergency medical conditions and short-term, non-cash, in-kind emergency disaster relief, and programs and services or assistance such as soup kitchens or short-term shelter are exceptions to PWRORA.<sup>25</sup> In many respects, Lifeline tracks the PRWORA exceptions and essential communication service is necessary to access those emergency, health and safety services. Thus, the Commission should not classify Lifeline as a PRWORA service since Lifeline performs a critical health and safety role.

As noted above, the vast majority of Lifeline households qualify via categorical eligibility which already complies with PRWORA. Participation in Medicaid alone accounts for 56% of all automated eligibility passes in 2025.<sup>26</sup> Medicaid, like the other federal benefits programs (e.g., SNAP and SSI) is already subject to PRWORA. Also, section 214 of the Housing and Community Development Act of 1980 prohibits HUD from making financial assistance available to ineligible noncitizens.<sup>27</sup> Applying PRWORA to Lifeline is duplicative and wasteful as it would require investing scarce Universal Service Funds on a citizenship determination that has already been performed on the vast, vast majority of participants. Leveraging the federal eligibility determinations already made by other agencies allows more USF funds to go towards service discounts.

---

<sup>23</sup> NPRM at ¶13.

<sup>24</sup> NPRM at ¶12, citing 47 C.F.R. §54.410(d)(2)(vi).

<sup>25</sup> 8.U.S.C. §1611(b).

<sup>26</sup> USAC, “National Verifier Annual Report and Data” (Jan. 30, 2026) at 2, <https://www.usac.org/wp-content/uploads/lifeline/documents/Data/2026-National-Verifier-Annual-Report-and-Data.pdf>.

<sup>27</sup> 42 U.S.C.A. § 1436a.

### **C. The DHS SAVE Program Adds Cost, Administrative Complexity and Has a High Error Rate.**

The Commission proposes adding an extra step to Lifeline eligibility determinations by using the Department of Homeland Security’s SAVE system to determine an applicant’s immigration status.<sup>28</sup> This additional step would be costly and would likely lead to a higher rate of errors with little to no benefit. The DHS’s SAVE system should not be applied outside of its intended purpose. Its own website cautions that SAVE does not, “[d]etermine applicant eligibility for a specific benefit or license. That determination is made by the benefit issuing or licensing agency.”<sup>29</sup>

The USCIS has attempted in the past to limit its exposure to the harms caused by inaccuracies in SAVE. And in the last year, DHS has violated federal privacy law by operating a modified SAVE system for months before publishing the legally required System of Records Notice, in violation of the Privacy Act’s requirement that notice precede, not follow, the deployment of modified data systems.<sup>30</sup>

Routing Lifeline determinations through a system that has been unlawfully modified and whose own governing agency disclaims responsibility for eligibility outcomes is inconsistent with the Commission’s independent statutory obligations under the Communications Act. Additionally, erroneous denials or determinations are likely, as multiple authorities, including the U.S. Commission on Civil Rights, have found that “SAVE is not a comprehensive list of U.S. Citizens . . . [,]is not updated to include all naturalized citizens, and it does not include

---

<sup>28</sup> NPRM ¶28.

<sup>29</sup> <https://www.uscis.gov/save/about-save/about-save>.

<sup>30</sup> See UnidosUS Comments in response to Notice of a modified system of records to the Systemic Alien Verification for Entitlements (SAVE) Program by the U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services, 2025-19735 (90 FR 48948), <https://www.regulations.gov/comment/USCIS-2025-0337-9211> [https://downloads.regulations.gov/USCIS-2025-0337-9211/attachment\\_1.pdf](https://downloads.regulations.gov/USCIS-2025-0337-9211/attachment_1.pdf).

[all]derivative citizens born to U.S. parents outside the country.”<sup>31</sup>

The Commission and Lifeline consumers benefit from privacy safeguards in the Communications Act<sup>32</sup> and these protections must not be weakened through any interconnections and with a compromised SAVE system. The Commission bears responsibility for ensuring Lifeline eligibility determinations are accurate. Moreover, several aspects of the SAVE program are subject to litigation and have been blocked by federal courts.<sup>33</sup> The reliability of SAVE has also been called into question. A GAO report found that 16% of SAVE responses required additional verification, but that 60% of agencies failed to complete the additional verification steps.<sup>34</sup>

Adding the use of the SAVE system as an additional step would also add unnecessary expense. According to the USCIS, the cost per transaction in FY 2026 is \$3.10 per verification for federal agencies and a \$25.00 monthly service charge for each month an agency submits at least one SAVE case.<sup>35</sup> Given the high percentage of times when additional verification steps are needed, these per transaction costs add up. As discussed earlier, Lifeline benefits from other federal programs conducting eligibility determinations that address the concerns raised regarding citizenship make the additional processes proposed by the Commission unnecessary and wasteful. The Commission’s proposed citizenship verification procedures raise the risk that eligible consumers will be denied Lifeline, increase program costs without offsetting benefits, and introduce risks of unwarranted denials in the administration of the program. The

---

<sup>31</sup> U.S. Commission on Civil Rights, *An Assessment of Minority Voting Rights Access in the United States* (2018), 148, <https://www.usccr.gov/reports/2018/assessment-minority-voting-rights-access-united-states>.

<sup>32</sup> E.g., 47 U.S.C. § 222.

<sup>33</sup> Eliza Sweren-Becker, the Brennan Center, *Status of Trump’s Anti-Voting Executive Order*, <https://www.brennancenter.org/our-work/research-reports/status-trumps-anti-voting-executive-order> (April 23, 2026).

<sup>34</sup> GAO, “Immigration Status Verification for Benefits: Actions Needed to Improve Effectiveness and Oversight” (March 2017) at 17, <https://www.gao.gov/products/gao-17-204>.

<sup>35</sup> <https://www.uscis.gov/save/about-save/transaction-charges>.

Commission should not adopt the proposed additional citizenship verification procedures. The current court challenges to SAVE would only mire Lifeline in unnecessary delays and legal risk. Thus, the Commission should not use SAVE in Lifeline eligibility determinations.<sup>36</sup>

#### **IV. Enrollment and Transfer Processes**

##### **A. The Commission Should Ensure Consumers Have Consented to Enroll into Lifeline or Transfer their Benefit.<sup>37</sup>**

The Commission proposes to modify the Lifeline enrollment and transfer processes to require additional consumer consent before enrollment or transfer is effectuated.<sup>38</sup> The current process requires that providers obtain consumer consent to enroll in Lifeline prior to submitting a consumer's personal information to the National Lifeline Accountability Database (NLAD).<sup>39</sup> The FCC's Office of Inspector General (OIG) recommended an independent verification of new enrollments or transfer requests through an affirmative text or email for the for Emergency Broadband Benefit program and the Affordable Connectivity Program.<sup>40</sup> OIG's concern is that providers or their agents are enrolling or transferring consumers without their knowledge or consent. We support efforts to ensure that consumers can sign up with the providers of their choice and once enrolled, are not involuntarily switched into different coverage (slammed) by another provider.

We are concerned, however, that at initial enrollment households may not have immediate access to a handset or a computer or digital skills to use email to perform the secondary verification. This additional process could delay access to Lifeline service. We recommend that a confirmation notification via text, email or in writing be sent to the consumer

---

<sup>36</sup> NPRM ¶28.

<sup>37</sup> NPRM ¶32.

<sup>38</sup> NPRM ¶¶33-36.

<sup>39</sup> 47 C.F.R. §54.404(b)(9).

<sup>40</sup> NPRM ¶33.

from the provider within 2-3 weeks of enrollment notifying the consumer that they have been enrolled in Lifeline service with the provider and indicate that, if this is in error, the enrollee should notify USAC immediately via clearly described instructions.

Customers may have different reasons for transferring to a new provider, for instance, a better service package, better reception or coverage, the original carrier is going out of business, or the customer has been slammed (unauthorized carrier transfer). A process that could slow down a consumer's ability to transfer service harms competition and the ability of consumers to put pressure via the marketplace to improve service offerings.

However, slamming harms consumers by preventing them from benefiting from a provider and service package of their choice. Instead of secondary verification measures that prevent consumers from easily switching to more competitive products to address slamming, we recommend that the Commission establish strong Lifeline slamming rules that provide uniform processes and timelines for carriers and strong remedies for consumers who have been slammed. When a consumer's Lifeline service has been transferred to another provider, we recommend that the consumer receive notice from the acquiring provider within 5 days about the transfer that includes a description of the new service terms and contact information for USAC regarding an unauthorized transfer. If the transfer is unauthorized, consumers should be immediately returned to their original provider or another provider of their choice, and the incident should be reported immediately to the FCC and USAC. Complaints about slamming and unauthorized enrollment should be reported annually by USAC in a public filing to the Commission in WC Docket No. 11-42 and complaints should be broken out by provider and the reports should inform the FCC of the number of Representative Accountability Database (RAD) lock-outs resulting from slamming and unauthorized enrollments.

**B. Keep the National Verifier Eligibility Verification at 90 Days to Allow Consumers Time to Select a Lifeline provider.**

Consumers have 90 days from when they are determined qualified to receive Lifeline to enroll with an Eligible Telecommunications Carrier (ETC).<sup>41</sup> This period of time should not be shortened as low-income consumers often must spend considerable time at work or managing benefits and may need the time to research providers in order to identify a reputable provider. The Commission should encourage informed consumers and shopping around by Lifeline consumers. If the consumer is working with a local digital navigator, for example, it may take a few appointments to apply and then select a provider and service. Consumer education is particularly important for those who have low incomes and may not have a full set of digital skills for researching products. Until the consumer selects a provider, there is no provider charging the Lifeline program for reimbursement for the provision of service, so the delay is not a cost to the program. The consumer should have this time to make their decision: the process timeline should remain as is.

**C. Lifeline Consumers Should Retain the Ability to Transfer Their Benefit to Another Provider.**

The Commission seeks comment on placing restrictions on a Lifeline consumer's ability to transfer their benefit to another provider.<sup>42</sup> As discussed above regarding unauthorized transfers of Lifeline benefits, the ability of Lifeline consumers to change services and service providers is one important mechanism to put upward pressure on the Lifeline marketplace to offer better, more competitive service offerings. Any friction in the ability to change providers or services weakens the competitiveness of the marketplace. We also recognize that increased velocity in changing service providers adds administrative costs to the Lifeline program. We tentatively support limiting Lifeline transfers to once per calendar month as was the rule with the

---

<sup>41</sup> NPRM ¶38.

<sup>42</sup> NPRM ¶¶39-41.

Affordable Connectivity Program along with the limited exceptions (e.g., the original provider goes out of business).<sup>43</sup> We strongly oppose a rule change that would require Lifeline subscribers to de-enroll and re-apply in order to transfer their Lifeline benefit to a new provider.<sup>44</sup> That imposes more administrative work on the part of the Lifeline consumer and thus more administrative burdens on the Lifeline program overall.

The Commission also asks if it should impose additional requirements or penalties for providers who fail to port consumers' numbers in connection with Lifeline service.<sup>45</sup> Lifeline customers should benefit fully from number portability and there should be no exceptions for any types of providers. Lifeline service helps ensure that assistance programs and doctors can reach consumers. These efficiencies in the delivery of other services and programs are lost if the consumer's number changes.

**D. Contributions Reform is a Necessary Component to Setting Meaningful Minimum Service Standards.**

The Commission seeks comments on workable minimum service standards,<sup>46</sup> but it is very difficult to address minimum service standards for the non-Tribal Lifeline program without also addressing contributions reform so that Lifeline service is not capped at \$9.25/month for broadband, or a voice/broadband bundle where broadband meets minimum standards (\$5.25/month for voice-only). It is our hope that a substantial increase in the monthly Lifeline support amount can bring in more robust and competitive broadband internet services for low-income consumers. For example, the civil right community has previously suggested that increased support amounts should be tied to increased service levels to offer appropriate market

---

<sup>43</sup> NPRM ¶40.

<sup>44</sup> NPRM ¶40.

<sup>45</sup> NPRM ¶41.

<sup>46</sup> NPRM ¶¶43-56.

signaling to providers that would increase service quality or quantity with an increased benefit.<sup>47</sup>

**E. The Commission Should End the Voice Support Phase-Down.**

The Commission seeks comment on whether to maintain support for voice-only services in the Lifeline program.<sup>48</sup> As noted by the Commission, there is a population of Lifeline customers that subscribes to voice-only service. This number, 160,000 subscribers, is gradually shrinking overtime, but it has not disappeared. We have long been opposed to the efforts to eliminate voice-only Lifeline support.<sup>49</sup> Some of these subscribers are in rural parts of the country and want Lifeline applied to their landline service. Voice service is still important for calls to emergency services and for emergency alerts. These alerts save lives in natural disasters such as hurricanes, flash floods, tornadoes and wildfires. Instead of trying to set a date in the future to end support for voice-only Lifeline, the support should continue as long as consumers are selecting this service for Lifeline support.

**F. The Commission Should Not Change the One-Per-Household Rule.**

The Commission seeks comment on whether to revise the current rule which limits Lifeline service to one benefit per household (the “One-Per-Household Rule”).<sup>50</sup> We support a Lifeline benefit that can provide connectivity to everyone in the household (versus one mobile Lifeline service for the family), and we oppose the Commission’s line of questions leading

---

<sup>47</sup> Letter from The Leadership Conference on Civil and Human Rights to Marlene Dortch, FCC, WC Docket No. 11-42 et al., 2-3 (filed Aug. 31, 2015).

<sup>48</sup> NPRM ¶¶57-59.

<sup>49</sup> Letter from The Leadership Conference on Civil and Human Rights to Marlene Dortch, FCC, WC Docket No. 11-42 et al. (filed Aug. 31, 2015). *See also e.g.*, UCC and NCLC Comments in Support of Reconsideration, WC Docket Nos. 11-42, 09-197, 10-90 (August 2, 2021); Joint Public Interest Comments in support of NALA Petition of Waiver of Lifeline Mobile Broadband Minimum Service Standard and Voice Support Phase-Down, WC Docket Nos. 11-42, 09-197, 10-90 (September 14, 2020); Public Interest Letter Requesting the Extension of COVID-19 Waivers, Restoration of Lifeline Voice Support and Freeze of Lifeline Minimum Service Standards, WC Docket Nos. 11-42, 09-197,96-45, 17-287 (August 10, 2020); Public Interest Letter in Support of the Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, WC Docket 11-42 (July 31, 2019); Joint Petition to Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, DA 19-617, WC Docket No. 11-42 (June 27, 2019).

<sup>50</sup> NPRM ¶63.

toward restricting existing access to Lifeline, such as a “one-per-residence” rule,<sup>51</sup> which would ignore multi-household residences. As the Commission acknowledges, it previously rejected a “one-per-residential address” rule at the same time it rejected a “one-per-person” rule.<sup>52</sup> The foundational principals of the Lifeline program are to ensure that “Consumers in all regions of the Nation, including low-income consumers . . . have access to telecommunications and information services, including interexchange services and advanced telecommunication and information services”<sup>53</sup> that are “just, reasonable and affordable.”<sup>54</sup> A substantial number of low-income consumers struggle with housing affordability (in addition to food insecurity and adequate access to medical care and medicine and other basic necessities), thus these households are likely to share residences to save on housing costs. In 2024 homelessness increased 18% from 2023, with over  $\frac{3}{4}$  of a million people counted as homeless in HUD’s Annual Point-in-Time Count in 2024.<sup>55</sup> According to the National Alliance to End Homelessness, Black and Indigenous communities experience higher rates of homelessness. The lack of affordable housing is the primary cause of homelessness along with low incomes, inadequate rental assistance programs and weak safety net programs. Over 7.2 million households are severely housing cost-burdened (where housing costs over 50% of household income) and nearly 3.2 million live doubled up (94 out of every 10,000 people in the US).<sup>56</sup> People experiencing homelessness and housing insecurity are the very people Lifeline should be helping. These are not households lucky enough to have a stable roof over their heads. The one-per-household rule allows for these households to benefit from Lifeline even if they share a residence. The current

---

<sup>51</sup> NPRM ¶63.

<sup>52</sup> NPRM fn 159.

<sup>53</sup> 47 U.S.C. §254(b)(3).

<sup>54</sup> 47 U.S.C. §254(b)(1).

<sup>55</sup> National Alliance to End Homelessness, “State of Homelessness: 2025 Edition (Sept. 4, 2025), <https://endhomelessness.org/state-of-homelessness/#report>.

<sup>56</sup> *Id.*

rule should not be modified to limit Lifeline benefits to those households with a unique U.S. Postal Service address.

Alternatives to altering the one-per-household rule could include creating an internal to USAC list of shelters, group homes and other forms of multiple resident housing. Agencies, local government and non-profits can be asked to provide confidential lists of such housing (particularly if this is shelter for survivors of domestic violence or trafficking) to USAC. This proposal would provide more clear oversight by USAC so it is likely to know where many households legitimately reside. Providers and members of the public should not have access to these addresses.

## **V. Promoting Principles for Service Provider Conduct**

### **A. The Commission Should Adopt Provider Compliance Plan Modifications.**

The NPRM asks about numerous specific modifications to the provider's compliance plans.<sup>57</sup> The Bureau should seek public comment on compliance plans, particularly from state utility commissions and members of the National Association of State Utility Consumer Advocates.<sup>58</sup> We recommend that a number of those proposed changes be adopted to strengthen program integrity including:

- Requiring compliance plans to include descriptions of the company's corporate structure (including identifying and describing any parent companies, affiliates, or subsidiaries).
- Identifying any unaffiliated third-party companies that will be used to assist the Lifeline program applicant with providing Lifeline program services to consumers and providing an explanation of the third-party's role in those efforts (this information should be updated as appropriate).
- Identifying corporate officers and their relevant experience; identifying top level management and their experience in providing telecommunications or related services to consumers; identifying compliance officers (the responsibility for ensuring compliance with the

---

<sup>57</sup> NPRM ¶¶82-83.

<sup>58</sup> NPRM ¶84.

program rules and appropriate laws and regulations rests with the chief executive officer of the company).

- The provider should include disclosure of all instances in which the company or its senior officers have been (1) involved or charged with criminal wrongdoing, or actions giving rise to criminal wrongdoing, (2) subject to investigations into possible violations of the False Claims Act or other similar laws, and debt collection efforts by state or federal agencies, or (3) engaged in waste, fraud, or abuse of federal funding and this information should be kept up-to-date.
- Compliance plans must explain how the ETCs will monitor their agents who enroll subscribers on their behalf; explain the steps they will take to ensure that agents hired by contractors to enroll subscribers on their behalf will be trained and their activities be monitored, and marketing companies must be required to report to the ETCs they work for when an agent they employ is barred from/locked out of RAD. This information must be kept up-to-date in the compliance plan.
- Compliance plans must disclose allegations or evidence of waste, fraud, and abuse and this information must be kept up-to-date.
- Compliance plans must include a description of measures the service provider is taking and will take to comply with Lifeline program rules, including how it will track usage and other program requirements, and how fraud by agents, third party companies involved in assisting customers, and others with access to the systems will be prevented with respect to enrollment and transfers-in.
- Compliance plans must include a detailed explanation of the company's Lifeline program compliance training and other internal controls; providers must provide employees with compliance training on Lifeline program rules and other internal controls.
- A Lifeline provider's compliance plans should terminate when ETCs are found guilty of committing fraud or other misconduct in the Lifeline program. Compliance plans should also terminate when ETCs change corporate ownership or control without notifying the Commission and receiving approval of an updated compliance plan.<sup>59</sup>
- Providers must update their compliance plans as circumstances change substantially and as noted above.<sup>60</sup>

## **B. The Commission Should Require Criminal Background Checks for Enrollment Representatives.**

The Commission seeks comment on whether a criminal background check should be

---

<sup>59</sup> NPRM ¶85.

<sup>60</sup> NPRM ¶85.

conducted before a RAD ID is issued.<sup>61</sup> The ETCs should be required to certify that each of the agents it uses for enrollment and transfers of Lifeline benefits has undergone a criminal background check. The ETC should be ultimately liable for the action of these agents as they will have access to sensitive personal consumer information and they will be helping low-income consumers, with the consumer's consent, enroll in the Lifeline program or transfer their benefit to another provider. ETCs who turn a blind eye or worse, intentionally use RAD agents who submit false information to USAC's systems (the National Verifier, NLAD, RAD) should face a range of consequences including suspension or debarment of the providers and/or their enrollment representatives and should also face the potential loss of their API access to USAC's databases.

## **VI. Conclusion**

Low-Income Consumer Advocates urge the Commission to step away from the many proposed modifications in this NPRM that purports to enhance program integrity and program process optimization while supporting eligible low-income households., but in effect will make it harder for eligible low-income consumers to benefit from universal service and more expensive to administer without clear benefits in efficiencies.

---

<sup>61</sup> NPRM ¶106.