

April 23, 2009

Via ECFS

Acting Chairman Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Robert M. McDowell
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Lifeline/Link-Up Support for Broadband Internet Access (CC Docket No. 96-45; WC Docket Nos. 05-337, 04-36, and 03-109; and WT Docket Nos. 07-195 and 04-356)

Dear Acting Chairman Copps and Commissioners:

The undersigned companies and organizations, representing hundreds of U.S. broadband providers, submit this letter in support of increasing lower-income consumers' access to broadband through the universal service Lifeline and Link Up programs and encourage the Federal Communications Commission ("FCC" or "Commission") to adopt a program with sufficient funding to achieve that goal.¹ The Commission's Lifeline and Link Up programs have made local telephone service widely available at an affordable rate. In an era defined by broadband access to the Internet, those same Commission mechanisms should now be applied to bring broadband services to low-income Americans. We urge you to promptly begin a proceeding to develop and adopt such a program.

Targeted low-income support programs have been shown to be highly effective and economically efficient means of increasing low-income subscribership.² Supporting low-income consumers' broadband access through the Lifeline and Link Up programs would direct broadband subscription discounts to the Americans who most need it. In stark contrast to other proposals to increase U.S. broadband subscription, these targeted

¹ *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service; Lifeline and Link Up; Universal Service Contribution Methodology; Numbering Resource Optimization; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Developing a Unified Intercarrier Compensation Regime; Intercarrier Compensation for ISP-Bound Traffic; IP-Enabled Services*; WC Docket No. 05-337; CC Docket No. 96-45; WC Docket No. 03-109; WC Docket No. 06-122 CC Docket No. 99-200; CC Docket No. 96-98; CC Docket No. 01-92; CC Docket No. 99-68; WC Docket No. 04-36; Order on Remand and Report and Order and Further Notice of Proposed Rulemaking, FCC 08-262 (rel. Nov. 5, 2008) (the "Notice").

² See G. Rosston and B. Wimmer, *The "State" of Universal Service*, 12 INFORMATION ECONOMICS AND POLICY 261, 264-65 (2000) (citing other studies reaching the same conclusion). Both petitions currently before the Commission on this subject cite to data from the Pew Internet & American Life Project showing that broadband take rates vary widely by income, with only 25 percent of Americans with incomes below \$20,000 subscribing to broadband – substantially below the average of 55 percent and well below the 85 percent of households with incomes above \$100,000 that subscribe to broadband. Notice at A-32 ¶¶ 68-69, C-31 ¶¶ 64-65, citing CCIA Petition at 2; TracFone petition at 2.

dollars will put low-income Americans on equal footing when *choosing* a broadband provider.

The ability to choose a broadband provider is critically important to the continued growth of U.S. broadband. By providing low-income Americans a subscription discount through a universal service subsidy, the consumer, not the government, will choose the broadband service that best suits his needs and will continue to promote the intermodal and intramodal competition that has driven innovation in broadband Internet access. In order to provide low-income Americans with this level of choice, such a program should be open to all eligible providers regardless of technology.

We support providing America's low-income consumers access to broadband through the universal service Lifeline and Link Up programs, and urge the Commission to promptly begin a proceeding to develop and adopt such a program. Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter is being filed via ECFS with the FCC Secretary's Office.

Sincerely,

Companies:

Alliance for Public Technology
AT&T
CTIA – The Wireless Association®
Cricket Communications, Inc.
GCI
Qualcomm
Rural Cellular Association
Rural Telecommunications Group, Inc.
Stelera Wireless
T-Mobile USA, Inc.
TracFone Wireless, Inc.
U.S. Cellular

Corporate Headquarters:

Washington, DC
Dallas, TX
Washington, DC
San Diego, CA
Anchorage, AK
San Diego, CA
McLean, VA
Washington, DC
Oklahoma City, OK
Bellevue, WA
Miami, FL
Chicago, IL