



June 11, 2015

The Hon. Tom Wheeler
Chairman
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Dear Chairman Wheeler:

The Internet Innovation Alliance's ("IIA") core mission is to promote policies that expand access to broadband for all consumers. Today, the Internet serves as a 21st century tool that promotes civic engagement and enables citizens to access education, healthcare, government services and job opportunities. Not having high-speed broadband service limits access to the benefits and opportunities offered in today's global digital economy.

In the U.S., consumers with economic means have nearly ubiquitous access to broadband, yet almost two-thirds of our nation's low-income community continues to seek that similar opportunity. Without broadband availability, low-income families face an uphill battle to obtaining the American dream.

Our organization has long taken an interest in ensuring that lower-income Americans have reliable access to a variety of choices for fast, affordable broadband service. We have been at the forefront in advocating for significant reform of the Federal Communications Commission's ("FCC") Lifeline program. Last November, IIA publicly released a White Paper noting how the federal Lifeline Program "is outdated in today's highly competitive broadband environment" and needs to be retooled for the modern broadband communications age.

In bringing Lifeline into the 21st century, broadband should be included as an integral, more affordable offering of the program, and consumers should be empowered by providing the subsidy directly to eligible people instead of companies. Moreover, to enhance administrative efficiency, we urge the FCC to shift program eligibility verification away from companies that are not accountable to the American people, and instead allow states to verify eligibility for Lifeline at the same time they determine consumer eligibility for other federal low-income programs. Such "coordinated enrollment" would benefit consumers by streamlining the eligibility process and ultimately enable subsidy recipients to receive a "Lifeline Benefit Card" where consumers could apply the funds to the provider of their choosing. These reforms would make program participation for all service providers more attractive, thereby broadening

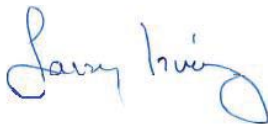
consumer choice and stimulating competition for the low-income consumer purchasing power.

We are very pleased to join all the FCC Commissioners that have signaled the need for significant Lifeline reform. Commissioner Mignon Clyburn has demonstrated tireless leadership in outlining a new fundamental framework for FCC reform; Commissioner Jessica Rosenworcel has identified how Lifeline reform can help narrow the broadband “homework gap”; FCC Commissioner Michael O’Rielly has flagged how approaching Lifeline reform with “common sense principles” will help protect the universal service fund and ratepayers against waste, fraud and abuse; and Chairman Wheeler has now set reform in motion with a proposal to restructure and modernize the Lifeline program. IIA applauds the Commission for quickly moving forward to initiate a new proceeding aimed to advance Lifeline reform this year. The time for reform is now, the need is great, and the goal is achievable. We look forward to working with you in turning Lifeline “into an efficient, effective program, laser-focused on helping low-income consumers in the United States access modern communications services.”

Respectfully,



Rick Boucher
Honorary Co-Chairman



Larry Irving



Bruce Mehlman



Jamal Simmons

Cc: Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Ajit Pai
Commissioner Jessica Rosenworcel

Attachment: IIA White Paper, “Bringing the FCC’s Lifeline Program into the 21st Century”. November 6, 2014.