



NATIONAL GRANGE

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American Values. Hometown Roots.

July 31, 2019

Chairman Ajit Pai
Commissioner O'Rielly
Commissioner Rosenworcel
Commissioner Carr
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 11-42

Dear Chairman Pai and Commissioners O'Rielly, Rosenworcel and Carr,

The National Grange, the nation's oldest rural advocacy organization, has a history of supporting the Lifeline program and its mission to make essential communications services affordable, especially for those living in rural communities. We appreciate the Commission's commitment to improving broadband access for rural Americans, and to Lifeline. Many consumers, including rural Americans, rely on voice services to contact social service agencies, access healthcare, and keep connected to other essential services.

However, we are writing today to urge you to maintain support for voice services in the Lifeline program at the December 1, 2018 levels, and to not eliminate support for voice services as proposed for 2021. We stated our concerns about Minimum Service Standards in our December 2018 filing¹, and agree with other filers who have since weighed in as well. For example, we agree with the filing from CTIA and many other advocates² that the FCC should freeze the broadband minimum data standards for Lifeline to the December 2018 numbers – 2 GB per month/household at \$9.25 – until the FCC concludes its 2021 Lifeline Study.

We agree with other advocates and CTIA³ who filed comments saying that, "Allowing these changes to go into effect would restrict eligible low-income consumers' access to, and undermine the

affordability of, Lifeline broadband and voice service offerings, to the detriment of the program and the millions of consumers it serves.”

As the other advocates have noted in their filing⁴, Universal Service Administrative Company data shows that, as of February 2019, nearly 42 percent of Lifeline customers still subscribe to plans that qualify for Lifeline by virtue of meeting the minimum service standards for voice service⁵. If the FCC moves forward without a pause, over 3.8 million Lifeline subscribers could be negatively impacted, in both rural and urban areas.

We appreciate the opportunity to provide these comments and we look forward to working with you on these important issues.

Sincerely,

A handwritten signature in black ink that reads "Betsy E. Huber". The signature is written in a cursive style and is centered within a light gray rectangular box.

Betsy E. Huber
National Grange President¹

¹ National Grange letter to FCC Commissioners, regarding dockets WC 17-287 and WC 11-42, December 18, 2018.

² Joint Petition To Pause Implementation of December 2019 Lifeline Minimum Service Standards Pending Forthcoming Marketplace Study, filed by CTIA, NCLC, NHMC, OCA, and UCC, on June 27, 2017 regarding dockets 11-42, 09-197, 10-90.

³ Ibid

⁴ Ibid

⁵ Ibid