

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

<b>In the Matter of</b>	)	
	)	
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 OF PUBLIC KNOWLEDGE, NATIONAL DIGITAL INCLUSION ALLIANCE, NATIONAL HISPANIC MEDIA COALITION, OPEN TECHNOLOGY INSTITUTE AT NEW AMERICA, MULTICULTURAL MEDIA, TELECOM AND INTERNET COUNCIL (MMTC), AMERICAN CIVIL LIBERTIES UNION, ASIAN AMERICANS ADVANCING JUSTICE|AAJC, EVERYONE ON, MASSACHUSETTS DIGITAL EQUITY COALITION, AND NTEN**

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**I. Introduction and Summary**

Public Knowledge, National Digital Inclusion Alliance, National Hispanic Media Coalition, Open Technology Institute at New America, Multicultural Media, Telecom and Internet Council (MMTC), American Civil Liberties Union, Asian Americans Advancing Justice|AAJC, Everyone On, Massachusetts Digital Equity Coalition, and NTEN submit these reply comments to the Federal Communications Commission’s (“FCC” or “Commission”) in response to the Notice of Proposed Rulemaking (“NPRM”) in the above-referenced proceedings.

By proposing to impose additional procedural hurdles and administrative burdens on the Lifeline program, the Commission risks abandoning the agency’s role as a facilitator of universal service in favor of acting as a gatekeeper of access. In 1996, the Commission was charged with

shepherding the Universal Service Fund and its programs to reach ‘universal service.’<sup>1</sup> Yet, 30 years later that goal has not been met. In fact, more than six million households remain offline and lack access to affordable, reliable high-speed internet.<sup>2</sup>

The Lifeline Program was designed to support the goals of universal service by making connectivity more affordable for low-income households. In every state, affordability is the leading reason households remain offline<sup>3</sup>, which makes Lifeline one of the FCC’s most important tools to close the digital divide. However, as telecommunications services and how Americans use them have changed over the years, the Lifeline program has not kept pace with the needs of low-income households and what it takes to communicate meaningfully in the 21st century. The program’s efficacy is severely limited by its stagnant benefit level and onerous administrative red tape.

The Joint Commenters argue that many of the proposals before the Commission, particularly expanded identity verification, full SSN collection, and usage tracking, risk further lowering the program’s participation levels that hovered between 19 percent and 22 percent over the last decade.<sup>4</sup> This persistent gap highlights the disparity between those who are eligible for the program and those who actually enroll. Additionally, the Joint Commenters argue that these proposed changes threaten to make enrollment more complex, cumbersome, invasive, and punitive even though Lifeline is already chronically underutilized. In addition, this proposed red

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<sup>1</sup> See 47 U.S.C. § 254.

<sup>2</sup> U.S. Census Bureau, American Community Survey, 2020-2024 ACS 5-Year Estimates, [https://data.census.gov/table/ACSST5Y2024.S1101?q=Household+Size+and+Type&g=010XX00US.\\$0400000](https://data.census.gov/table/ACSST5Y2024.S1101?q=Household+Size+and+Type&g=010XX00US.$0400000).

<sup>3</sup> Kelly Wert, “Every State Identifies Broadband Affordability as Primary Barrier to Closing Digital Divide,” Pew Research Center (Oct. 4, 2024), <https://www.pew.org/en/research-and-analysis/articles/2024/10/04/every-state-identifies-broadband-affordability-as-primary-barrier-to-closing-digital-divide>.

<sup>4</sup> Adrienne B. Furniss, “The Importance and Effectiveness of the Lifeline Program” (August 28, 2023), Benton Institute for Broadband & Society, <https://www.benton.org/even-thoughblog/importance-and-effectiveness-lifeline-program>.

tape could result in increased administrative costs for the Commission and declines in overall participation.

According to the Universal Service Administrative Company (“USAC”), as of December 2025, Lifeline had a 21 percent participation rate, with approximately eight million subscribers enrolled out of the more than 37 million households that are eligible to participate.<sup>5</sup> To be clear, eight million *households* enrolled means that the program positively impacts far more than eight million *individuals*, given that the average household size in America includes approximately 2.5 people.<sup>6</sup> This demonstrates that Lifeline’s reach translates into a much larger population-impact in practice with millions more standing to benefit.

Unfortunately, a closer look at the numbers on the state level tells a similar story of underutilization. In Texas, for example, there are a total of 256,000 Lifeline recipients<sup>7</sup> and yet, there are 2.9 million households that are eligible according to 2024 ACS data.<sup>8</sup> North Carolina shares similar underutilization statistics with approximately 104,000 subscribers enrolled in Lifeline as of December 2025<sup>9</sup> while 1.2 million households are eligible.<sup>10</sup> Less populated states such as New Mexico and Nebraska also have lower enrollment rates as compared to their population, as the latest data demonstrates that their participation rates are at 14 percent and 25 percent, respectively.<sup>11</sup>

Therefore, the Joint Commenters assert that the Commission is undertaking an exercise meant to cast doubt on the Lifeline program and lay the groundwork for policies that would

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<sup>5</sup> Universal Service Administrative Company, Lifeline Participation Rate (Dec. 2025), <https://www.usac.org/lifeline/resources/program-data/#Participation>.

<sup>6</sup> United States Census Bureau, Current Population Survey (Dec. 2025), <https://www.census.gov/quickfacts/fact/table/US/HCN010222>.

<sup>7</sup> Universal Service Administrative Company, Lifeline Participation Rate (Dec. 2025), <https://www.usac.org/lifeline/resources/program-data/#Participation>.

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

enable further harm to the working poor and people living on fixed incomes. Time would be better spent ensuring that the economic future of households and the broader nation are strengthened by enabling more people to adopt and maintain vital connections to voice and broadband services in an era of rising data demands and an ongoing affordability crisis.

## **II. The Commission’s Waste, Fraud, and Abuse Narrative is Misguided.**

The Universal Service Administrative Company (“USAC”), the entity charged with administering USF programs, reports as recently as January 2026, that they are actively engaged in rooting out waste, fraud, and abuse through the usage of the National Lifeline Eligibility Verifier (“National Verifier”). As USAC stated, the goals of the National Verifier are to:

- “(1) protect against waste, fraud, and abuse;
- (2) lower costs to the Fund and ETCs through administrative efficiencies; and
- (3) better serve eligible beneficiaries by facilitating choice and improving the enrollment experience.”<sup>12</sup>

They further stated in this recent report that “these goals are being met through the design of the National Verifier system and the administration of related processes”<sup>13</sup> and that “the automation in the National Verifier reduces burdensome and complex manual reviews and decreases the likelihood of improper payments.”<sup>14</sup> Similarly, the OIG Report that the Commission so enthusiastically relies on in this item, states that “the National Verifier significantly reduced eligibility fraud.”<sup>15</sup> The December 2025 OIG report further states that “there are additional

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<sup>12</sup> Universal Service Administration Company, National Verifier Annual Report Data at 1 (Jan. 2026), <https://www.usac.org/wp-content/uploads/lifeline/documents/Data/2026-National-Verifier-Annual-Report-and-Data.pdf>.

<sup>13</sup> *Id* at page 4.

<sup>14</sup> Universal Service Administration Company, National Verifier Annual Report Data at 5 (Jan. 2026), <https://www.usac.org/wp-content/uploads/lifeline/documents/Data/2026-National-Verifier-Annual-Report-and-Data.pdf>.

<sup>15</sup> Office of Inspector General Federal Communications Commission, FCC’s Top Management and Performance Challenges for FY 2026 at 9 (Dec. 2025), [https://www.fcc.gov/sites/default/files/FCC\\_Top\\_Management\\_and\\_Performance\\_Challenges\\_for\\_FY2026\\_Overview\\_508.pdf](https://www.fcc.gov/sites/default/files/FCC_Top_Management_and_Performance_Challenges_for_FY2026_Overview_508.pdf).

opportunities to enhance data collection to inform NLAD and the National Verifier; for example, by accessing subscriber eligibility data from states with which the Commission has not yet secured matching agreements.”<sup>16</sup> The Joint Commenters support more matching agreements with state databases not only to reduce fraud, but also to decrease the enrollment burden experienced by potential Lifeline enrollees.

During Q4 of 2025, “44.72% of applications were automatically deemed eligible via database connections that the Lifeline program has established with states and federal agencies [and of] the applications received, 53.09 percent failed to pass an automated eligibility check and did not provide sufficient eligibility documentation.”<sup>17</sup> More specifically, 2.18 percent of all applications received during Q4 of 2025 were approved with proper documentation, 50.19 percent failed to pass an automated eligibility check and did not provide sufficient eligibility documentation, 2.9 percent of all applications were denied because eligible subscribers did not provide sufficient data. NDIA affiliates’ experiences supporting their clients with Lifeline enrollment supports these figures. In a working group session with NDIA, affiliates noted that proper documentation and the process of submitting it, which require digital skills many of their clients do not have, is one of the most frequent barriers to increased enrollment. These data show that the National Verifier *works*, and could be strengthened with additional data inputs from states and agencies. Should the Commission truly seek to eliminate waste, it should invest in strengthening its existing technology and matching agreements to reduce manual staff review time.

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<sup>16</sup> *Id* at pages 9-10.

<sup>17</sup> Universal Service Administration Company, National Verifier Quarterly Eligibility Data at 2 (Dec. 2026), <https://www.usac.org/wp-content/uploads/lifeline/documents/Data/2025-Q4-National-Verifier-Quarterly-Eligibility-Data.pdf>.

Further, as Public Knowledge previously stated, “Too often, ‘waste, fraud, and abuse’ rhetoric is used as a political shield to sidestep meaningful reform and instead revives debates about ‘deservingness’ to distract from what is truly at stake.”<sup>18</sup> In this case, what is truly at stake is the cost of disconnection. In February 2025, the Brattle Group found that the Commission’s own enhanced affordability subsidy program, the Affordable Connectivity Program (“ACP”), paid for itself in terms of healthcare, labor force participation, and education in the following ways:

- “A switch from one physical visit to telehealth for one single Medicaid recipient could save enough money to fund five years of ACP support for one Medicaid recipient.
- Over 80 percent of the annual costs of the ACP could be offset solely from \$6.0 billion in Congressional Budget Office (CBO) scorable telehealth-induced cost savings under Medicaid.
- Reinstating the ACP would improve students’ academic performance and benefit their future earnings by over \$3.7 billion per year, starting approximately 10 years after high school.
- \$2.1–\$4.3 billion in annual wage gains from expanded labor force participation could be generated if the program were reinstated.”<sup>19</sup>

Relatedly, a lack of a robust broadband subsidy to bridge the affordability gap can undermine providers’ ability, particularly in rural communities where many geographic regions remain unserved and underserved, to make the economic case to deploy broadband. When households are unable to adopt the service due to their inability to pay, it reduces revenues and impacts providers’ return on investment. Conversely, subsidies allow for providers to better forecast their revenues, which helps them to support their deployment decisions. A Common

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<sup>18</sup> Alisa Valentin, “Public Knowledge Opposes FCC Vote Jeopardizing Lifeline Program” (Feb. 18, 2026), <https://publicknowledge.org/public-knowledge-opposes-fcc-vote-jeopardizing-lifeline-program/>.

<sup>19</sup> Brattle Group, New Brattle Study Finds the Affordable Connectivity Program Pays for Itself (Feb. 2025), <https://www.brattle.com/wp-content/uploads/2025/02/Paying-for-Itself-How-the-Affordable-Connectivity-Program-Delivers-More-Than-It-Costs.pdf>.

Sense and Boston Consulting Group study supports this reasoning as they found that, “the existence of ACP reduces by 25 percent the per-household subsidy.”<sup>20</sup>

Lastly, the rapid evolution of technology makes it clear that future digital inequalities are unavoidable. Emerging technologies such as AI could create new digital divides that require ongoing investments and research.<sup>21</sup> This is no longer hypothetical; all Americans, from young kids to older adults, now interact with AI technologies daily and require a minimum of basic AI literacy to be able to operate in today’s world.<sup>22</sup> Because AI literacy depends on affordable, reliable broadband access, the absence of a robust affordability subsidy will further exacerbate the disparities. Further, economic competitiveness with other nations will simply not be achieved if the affordability gap is not adequately addressed.

### **III. The Commission Should Better Acknowledge and Remedy Consumer Harms Experienced by Lifeline Eligible Households.**

Recent enforcement actions and whistleblower complaints have shown instances of provider misconduct that have harmed Lifeline consumers both directly and indirectly, while also shaping a narrative about the program through media coverage that influences reactionary policy responses for political ends. The Q-Link case in 2025, the Armstrong Group in 2024, and the 2022 San Francisco whistleblower complaint each illustrate that providers, not eligible and subscribing Lifeline households, are the primary entities engaging in fraud and abuse concerns within USF programs.<sup>23</sup> The Joint Commenters agree that program integrity is essential;

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<sup>20</sup> Common Sense and Boston Consulting Group, *Closing the Digital Divide Benefits Everyone, Not Just the Disconnected* (2022), [https://www.common sense media.org/sites/default/files/research/report/2022-cs-bcg-closing-digital-divide\\_final-release-3-for-web.pdf](https://www.common sense media.org/sites/default/files/research/report/2022-cs-bcg-closing-digital-divide_final-release-3-for-web.pdf).

<sup>21</sup> Danna Lorch, “America’s Digital Divide: Where Workers Are Falling Behind,” Harvard Business School, (February 10, 2025), <https://www.library.hbs.edu/working-knowledge/americas-digital-divide-where-workers-are-falling-behind/>.

<sup>22</sup> Erin Mote, “Opinion: AI can be a great equalizer, but it remains out of reach for millions of Americans. We cannot let that continue,” Hechinger Report (Sept. 7, 2025), <https://hechingerreport.org/opinion-ai-can-be-a-great-equalizer-but-it-remains-out-of-reach-for-millions-of-americans-we-cannot-let-that-continue/>.

<sup>23</sup> Ingrid Evans, “San Francisco Whistleblower Attorney: Wireless Carrier Pays \$13.4 Million to Settle False Claims Relating To FCC’s Lifeline Program,” Evans Law (May 9, 2022), <https://www.evanslaw.com/san-francisco-whistleblower-attorney-wireless-carrier-pays-13-4-million-to-settle-false-c>

however, the Commission needs to properly target bad actors while protecting the nation’s most vulnerable consumers.

For example, a proper role of the FCC is to enforce rules that protect Lifeline consumers from predatory practices by prohibiting Eligible Telecommunications Carriers (ETCs) from offering or providing enrollment representatives or their direct supervisors any commission compensation based on the number of consumers who apply for or are enrolled in the Lifeline program with that ETC.<sup>24</sup> Individuals enrolling people in the Lifeline program are often referred to as enrollment representatives, Lifeline representatives, or Lifeline agents. To help prevent waste, fraud, and abuse, eligible ETCs must require enrollment representatives to register with USAC.<sup>25</sup> For this purpose, USAC maintains and manages the Representative Accountability Database (“RAD”). RAD validates the identities of service provider representatives performing transactions in the National Lifeline Accountability Database and the National Verifier.<sup>26</sup>

Individuals that are required to register for a Representative ID in the RAD system include: individuals directly interfacing with potential subscribers to enroll them in Lifeline, immediate supervisors of individuals directly interacting with potential subscribers to complete Lifeline enrollments, individuals that contract directly with ETCs and oversee or manage a team of people working to complete Lifeline enrollments (Master Agent), individuals that either assist subscribers with recertification or prepare subscriber information for recertification and

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[laims-relating-to-fccs-lifeline-program/](#); “Q Link Wireless LLC and Issa Asad to Pay More than \$110M in Global Resolution to Resolve Criminal Charges and False Claims Act Allegations,” Office of Public Affairs, U.S. Department of Justice (Jul. 28, 2025), <https://www.justice.gov/opa/pr/q-link-wireless-llc-and-issa-asad-pay-more-110m-global-resolution-resolve-criminal-charges>; Armstrong Group Agrees to Pay \$6.5M to Settle False Claims Act Allegations Relating to Subsidies Under the Federal Communications Commission’s High-Cost Program, Office of Public Affairs Archives (Jul. 12, 2024), <https://www.justice.gov/archives/opa/pr/armstrong-group-agrees-pay-65m-settle-false-claims-act-allegations-relating-subsidies-under>.

<sup>24</sup> 47 CFR § 54.406(b) (2019)a.

<sup>25</sup> 47 CFR 54.406 (a)(1).

<sup>26</sup> Universal Service Administrative Company, "Representative Accountability Database (RAD)," <https://www.usac.org/lifeline/rad/>.

submission to the National Verifier or NLAD, and customer service representatives that update personally identifiable information for existing Lifeline subscribers.<sup>27</sup>

Despite these protections, NDIA affiliates have identified problematic activities that some Lifeline representatives engage in while signing up qualified individuals for Lifeline. Many ETCs offer phones or tablets to consumers at enrollment, often with no payment required. However, the Lifeline program only provides subsidies for service, meaning that providers (and in some instances states) incur the cost of the devices. Some Lifeline agents entice low-income customers with free cell phones as part of an introductory offer, and then fail to fully disclose and make understandable the new or increased monthly fees that Lifeline applicants may not fully understand or expect. Additionally, NDIA affiliates have learned about cases in which participants in the Lifeline program received inoperable cell phones or experienced technical issues with devices they received at pop-up events or temporary sign-up locations. When there is no customer support for the devices (which is the common scenario), these participants lack a direct way to repair their devices or seek assistance. The Office of Inspector General at the Commission found that many providers failed to register all their enrollment representatives or report their enrollment activity in RAD, resulting in the FCC's inability to hold them accountable for following the rules of the program.<sup>28</sup> In modernizing Lifeline, the FCC should account for these challenges and implement protections to ensure that qualified Lifeline applicants are well-informed, have choices, and can easily enroll in the program. To that end, the Joint Commenters support OIG's 2025 recommendation to enforce program rules that require ETCs to

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<sup>27</sup> Universal Service Administrative Company, "Representative Accountability Database (RAD)," <https://www.usac.org/lifeline/rad/>.

<sup>28</sup> Office of Inspector General, Federal Communications Commission, *Open Recommendations from FCC OIG Investigations* (Mar. 31, 2025), [https://www.fcc.gov/sites/default/files/OI%20Open%20Recommendations%20Report\\_508.pdf](https://www.fcc.gov/sites/default/files/OI%20Open%20Recommendations%20Report_508.pdf).

timely and accurately register all enrollment representatives in RAD and report their enrollment activity.<sup>29</sup> Without compliance, we urge the FCC to investigate alleged misconduct.

Additionally, NDIA affiliates have located several job postings for Lifeline agents or independent contractors to enroll qualified individuals in Lifeline. The postings included descriptions of compensation with no caps on commissions, granting the applicant the ability to maximize their earnings based on their efforts,<sup>30</sup> unlimited earning potential with the option to select desired on-site location(s),<sup>31</sup> and monthly bonuses with uncapped income.<sup>32</sup> These activities are concerning and do not promote strong program integrity as they certainly fail to support a system that prioritizes the needs of program participants.

Again, the Joint Commenters emphasize that there have undoubtedly been bad actors who have taken advantage of already vulnerable populations, yet the harm is compounded when officials and media shift blame onto the very groups (rural, low-income, veterans, and seniors) these programs are intended to protect, which allows corporate actors to walk away with limited consequences.

#### **IV. Full Social Security Numbers Requirements Create Barriers to Participation and Exceed Lifeline's Statutory Purpose.**

The Lifeline program was created as an extension of Congress's mandate for universal service in the Communications Act of 1934 and reaffirmed in the Telecommunications Act of 1996.<sup>33</sup> While the services covered by universal service have evolved in the last 90 years, the principle of universal service itself has not: "Consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high-cost areas, should have access to

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<sup>29</sup> *Id* at 9.

<sup>30</sup> Lifeline Agent, enTouch Wireless, accessed September 15, 2025, <https://entouchwireless.com/agent-application/>

<sup>31</sup> Independent Contractors, StandUp Wireless, <https://standupwireless.com/careers/contractors/>.

<sup>32</sup> Hiring Lifeline Field Agents & Managers, Executive Marketing Group, <https://www.lifelinewirelessjobs.com/>.

<sup>33</sup> 47 U.S.C. § 254.

telecommunications and information services — including advanced telecommunications and information services — that are reasonably comparable to those provided in urban areas at reasonably comparable rates.”<sup>34</sup>

In order to meaningfully move the needle on universal service, the Commission must cast a wide net to reach and help as many eligible consumers as possible through programs, like Lifeline. Thus, the program's enrollment methods should be designed to minimize barriers and increase conversion from eligibility to enrollment. Unfortunately, the current proposed move to require disclosure of full Social Security Numbers (“SSNs”) from all eligible applicants does the exact opposite, chilling enrollment and undercutting the program’s impact. The Commission is proposing to add this friction on top of a verification system that already works: one built on Name, Date of Birth, and the last four digits of an SSN, a data-minimized formula that has reliably verified eligibility through state and federal databases for years. The Commission's proposal for full SSN disclosure is out of touch with the reality of the consumers it serves through the Lifeline program. Eligible applicants may lack experience with online or government applications, and are likely to be wary of sharing data with government agencies. This—coupled with the fact that millions of Americans have had their SSNs leaked via data breaches in the last several years, including breaches from within government agencies—would present a barrier for any reasonable consumer faced with the burden of sharing personal data in an application.<sup>35</sup>

As the Joint Commenters previously stated, the Commission has a duty to reduce waste, fraud, and abuse as much as possible, but this proposal does not achieve that. The existing

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<sup>34</sup> 47 U.S.C. § 254(b)(3).

<sup>35</sup> See Disclosure of Charles Borges, Chief Data Officer, Soc. Sec. Admin., to U.S. Office of Special Counsel (Aug. 26, 2025), <https://whistleblower.org/wp-content/uploads/2025/08/08-26-2025-Borges-Disclosure-Sanitized.pdf> (alleging DOGE personnel copied the NUMIDENT database — containing names, dates of birth, and Social Security numbers of more than 300 million Americans — to a cloud environment lacking standard SSA security controls); Identity Theft Res. Ctr., 2025 Data Breach Report (Jan. 2026) (documenting that Social Security numbers were involved in approximately two-thirds of 2025 data breach notifications).

three-part formula keeps the data burden on applicants reasonably low while meeting the program's integrity needs. Departing from this long-standing, noncontroversial practice does not fix a real problem; it sets a dangerous precedent of demanding more personally identifiable information from Americans simply for seeking out a federal assistance program.

Additionally, this comes against the backdrop of the current Administration's broader efforts to amass and consolidate vast amounts of personal information across federal and state programs, with little regard for privacy and security protections. Already, there have been reports of other federal agencies experiencing potential data breaches and disregarding standard privacy protocols under the Administration's *laissez-faire* approach to data handling.<sup>36</sup> This proposal risks dramatically accelerating these efforts, potentially putting people's personal information at even greater risk of misuse and breach.

Further, the Joint Commenters are extremely concerned with the undertone of this proposal. For a program that garnered bipartisan support and cooperation for decades, it is difficult to ignore the timing of this proposal alongside expanded federal data-sharing initiatives targeting immigrant communities among other anti-immigrant strategies deployed by the Trump Administration. Regardless of the political moment and the desire to get points on an invisible scoreboard, it is imperative to remind the Commission that mixed-status immigrant families *are legally eligible* for the Lifeline program through several programmatic qualifications, including through American citizen minor children, and utilization of Lifeline is not relevant for the current interpretation of the "public charge" rule. Requiring full SSNs does not change that fact, but it does increase the surveillance of people in the United States by an agency that has no

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<sup>36</sup> Jenna McLaughlin, "A whistleblower's disclosure details how DOGE may have taken sensitive labor data," All Things Considered on NPR (April 15, 2026), <https://www.npr.org/2025/04/15/nx-s1-5355896/doge-nlr-Elon-musk-space-security>; US Government and Accountability Office (GAO), *Department of Government Efficiency: Treasury Needs to Fully Implement Data Protection Controls* (Apr. 28, 2026), <https://www.gao.gov/products/gao-26-108131>.

authority or jurisdiction to do so beyond what Section 254 authorizes. If these proposed barriers keep even one more family from getting connected, that is one family too many. The Commission's duty is to advance universal service, not to put it further out of reach for the households Lifeline was designed to serve.

**V. Replacing the One-Per-Household Rule With a One-Per-Residence Limit Would Re-Create Barriers the 2012 Reform Already Resolved and Disproportionately Harm Multigenerational Households.**

This Notice of Proposed Rulemaking reflects a purposeful misunderstanding of the living conditions of households across America, including multigenerational households, low-income individuals, unhoused people, those in transitional shelters, and those who are victims of domestic violence, to name a few. While the Joint Commenters are extremely concerned with this Chair's overarching attempt to use certain populations as scapegoats in order to advance a narrative that is meant to cause harm, the Joint Commenters are also concerned with the way that broader goal manifests itself.

The Commission seeks comment on whether to replace the long-standing one-per-household rule with a one-per-residence limit, a cap on the number of households at a single address as a rebuttable presumption, or a redefinition of "independent economic household."<sup>37</sup> Each of these proposals would walk back a deliberate, corrective design choice the Commission made in the 2012 Lifeline Reform Order.<sup>38</sup> Before 2012, enforcement of duplicate-prevention rules effectively treated addresses as the unit of measurement, which systematically excluded eligible families living in multigenerational, multifamily, and shared-housing arrangements. The 2012 Order fixed this by defining "household" as an economic unit of people who share income and expenses so that separate low-income families at

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<sup>37</sup> 2026 NPRM at paras. 63–64.

<sup>38</sup> Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd. 6656 (2012); *see also* 2026 NPRM at para. 63 n.159 (acknowledging that "[t]he Commission has previously considered adopting, but rejected, a one-per-residential address rule").

the same address could each access the benefit they qualify for.<sup>39</sup> That definition has functioned for 14 years without meaningful evidence of abuse. The Commission must not undo it.

Multigenerational living is not an edge case to be policed; it is a long-standing cultural and family practice across our communities and many others. Pew Research Center found that about a quarter of Asian (24 percent), Black (26 percent), and Latino (26 percent) Americans lived in multigenerational households in 2021, compared with 13 percent of those who are white.<sup>40</sup> For communities of color, multigenerational households are part of how families care for elders, raise children, and maintain cultural and linguistic continuity across generations. A one-per-residence rule (or any rule that treats multiple households at one address as presumptively suspect) would impose documentation and verification burdens on these families that other applicants would not face. The Commission cannot ignore the predictable disparate impact of such a rule on communities defined by race, ethnicity, and national origin. Further, the Title VI of the Civil Rights Act of 1964 prohibits federally administered programs from operating in ways that produce such disparities,<sup>41</sup> and Section 254 directs this Commission to ensure universal service is available to consumers in all regions of the Nation, including low-income consumers.<sup>42</sup> A rule that produces disproportionate barriers for Latino, Black, Asian, and immigrant households cannot be reconciled with either obligation.

For many of the families Lifeline is designed to serve, multigenerational living is also an economic necessity. Since 2001, rent has increased by 26.7 percent after adjusting for overall

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<sup>39</sup> 47 C.F.R. § 54.400(h) (2024) (defining "household" for purposes of the Lifeline program); see also 47 C.F.R. § 54.409(c) (2024) (codifying one-per-household limitation).

<sup>40</sup> Richard Fry, Jeffrey S. Passel & D'Vera Cohn, *The Demographics of Multigenerational Households*, Pew Rsch. Ctr. (Mar. 24, 2022), <https://www.pewresearch.org/social-trends/2022/03/24/the-demographics-of-multigenerational-households/>.

<sup>41</sup> Civil Rights Act of 1964, 42 U.S.C. § 2000d (2018) ("No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.").

<sup>42</sup> 47 U.S.C. § 254(b)(3) (2018) (directing that "[c]onsumers in all regions of the Nation, including low-income consumers . . . should have access to telecommunications and information services").

inflation, while renters' incomes have risen only 7.7 percent<sup>43</sup> in real terms over roughly the same period. In 2022, 83 percent of renter households earning less than \$30,000 were cost-burdened.<sup>44</sup> For low-income families, sharing housing across generations is often the only way to remain housed at all. The 2012 economic-household definition recognized this reality. To now design a verification rule that penalizes families for sharing an address directly contradicts the program's stated purpose. An FCC affordability program cannot, in good faith, make it harder for low-income families to access service because those families have already made the difficult choice to share housing to afford rent. The Commission cannot punish co-living and call it mission-aligned.

Additionally, NDIA Affiliates have reported challenges with unhoused people and people living in shelters and other social service housing (substance abuse programs, mental health facilities, therapeutic communities, halfway houses, congregate shelters, etc.), providing an address to demonstrate program eligibility. Shelters and other social service groups (reentry and rehabilitation organizations, addiction treatment, aftercare programs, outpatient programs, etc. ) will allow people to use their address, and it is not uncommon for people to live in shelters for two to three years. Mobile device benefits are essential for securing employment, accessing healthcare, finding permanent housing, and communicating with friends and family. Elder communities are also impacted by physical address requirements. NDIA affiliates have cited instances when they are supporting an elder in enrolling in the program, and someone uses their physical address in a multi-resident living facility, which then renders them ineligible.

Additionally, some affordable housing units rent rooms only, and sometimes just beds, when

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<sup>43</sup> Sonya Acosta & Erik Gartland, *New Census Data Show Persistent Gap Between Incomes and Rent, Impact of Rental Assistance*, Ctr. on Budget & Pol'y Priorities (Sept. 15, 2025), <https://www.cbpp.org/blog/analyzing-the-census-bureaus-2024-poverty-income-and-health-insurance-data>.

<sup>44</sup> Sophia Wedeen, *High Housing Costs Are Consuming Household Incomes*, Joint Ctr. for Hous. Studies of Harv. Univ. (June 12, 2024), <https://www.jchs.harvard.edu/blog/high-housing-costs-are-consuming-household-incomes>.

tenants work alternating schedules. The lease is for the room and can have an independent household with the same address (including the unit number).

The proposed shift is also part of a troubling pattern in this NPRM. Like the proposed full-SSN requirement, it adds applicant-side burden of documentation, verification of household composition, and the obligation to rebut a presumption without identifying any failure in the current rule that would justify the cost. The Commission's own questions in the NPRM confirm this: it asks how often subscribers have been wrongfully rejected, how often duplicate support has improperly been granted, and whether circumstances have changed since 2012.<sup>45</sup> These are not the questions of a Commission responding to a documented integrity problem. They are the questions of a Commission searching for one. With the Affordable Connectivity Program ended, Lifeline is the only remaining federal program supporting communications affordability for low-income households. Narrowing it now, on the basis of speculation rather than evidence, moves the Commission further from, not closer to, the universal service mandate Congress directed it to pursue.

Again, the current rule is not broken. It is the product of careful, evidence-based reform that corrected a real exclusion problem. Re-creating that exclusion in 2026 would harm the very households Lifeline exists to serve, in direct conflict with both Section 254 and the Commission's broader civil rights obligations.

## **VI. The Lifeline Benefit Must Be Enhanced to Meet Modern-Day Connectivity Needs.**

For many years, the Lifeline program focused on providing access to voice and text, but in 2016, it was updated to make broadband an allowable expense.<sup>46</sup> Yet, at \$9.25 a month, the

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<sup>45</sup> 2026 NPRM at para. 64.

<sup>46</sup> In the Matter of Lifeline and Link Up Reform and Modernization, adopted March 31, 2016, available at <https://docs.fcc.gov/public/attachments/FCC-16-38A1.pdf>.

benefit is limited in its ability to support a home broadband connection, given that households report paying an average of \$67 per month for home service.<sup>47</sup> The current \$9.25 monthly benefit was set decades ago and has not been adjusted to reflect modern broadband prices nor been indexed to account for inflation. Further, the Pew Research Center data states that 57% of U.S. adults with annual household incomes of \$30,000 subscribe to fixed home broadband. Meanwhile, 98 percent of adults in the U.S. with annual household incomes of more than \$70,000 report that they use the internet, and 88 percent of that population say they have broadband at home.<sup>48</sup> What drives this gap is the simple fact that millions of Americans cannot afford consistent broadband service. These households fall into the category researcher, John Horrigan, describes as “subscription vulnerable” because they experience “intermittent disconnection due to inability to pay the bill and find it very difficult to pay for service.”<sup>49</sup> ACP closed these broadband service gaps for more than 23 million enrolled households in rural, Tribal, and urban communities, enabling consistent connectivity and facilitating consistent access to education, healthcare, job applications, and work.<sup>50</sup> Simply put, ACP was popular because it worked.<sup>51</sup> The program received bipartisan support and helped seniors like Phyllis,<sup>52</sup> a 78-year-old retired federal government worker living in rural Pennsylvania, and veterans like

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<sup>47</sup> Colby Humphrey, Elizabeth A. Mack, and John B. Horrigan, "Moving toward a continuum model of broadband affordability for low-income households," *Telecommunications Policy* (2025), <https://doi.org/10.1016/j.telpol.2025.103027>.

<sup>48</sup> Risa Gelles-Watnick, “Americans’ Use of Mobile Technology and Home Broadband,” (Jan. 31, 2024), <https://www.pewresearch.org/internet/2024/01/31/Americans-use-of-mobile-technology-and-home-broadband/>.

<sup>49</sup> John Horrigan, “The ACP Boosted Rural Adoption and Helped Keep the Subscription Vulnerable Online,” Benton Institute for Broadband & Society, (Apr. 2, 2025), <https://www.benton.org/blog/acp-boosted-rural-adoption-and-helped-keep-subscription-vulnerable-online>.

<sup>50</sup> Federal Communications Commission, Measuring the Impact of the Affordable Connectivity Program: Survey Fact Sheet (2024), <https://www.fcc.gov/sites/default/files/ACP-Survey-Results.pdf>; Universal Service Administrative Company, “ACP Enrollment and Claims Tracker,” <https://www.usac.org/about/affordable-connectivity-program/acp-enrollment-and-claims-tracker/>.

<sup>51</sup> Amy Huffman, “The Affordable Connectivity Program is Popular Because it Works,” National Digital Inclusion Alliance (Apr. 22, 2024), <https://www.digitalinclusion.org/blog/the-affordable-connectivity-program-is-popular-because-it-works/>.

<sup>52</sup> The National Digital Inclusion Alliance. “Phyllis Is Online with ACP and Is Advocating for More Older Adults,” (Jan 3, 2024), [https://youtu.be/EIkVJb\\_sCKI?si=okHOxgO6Tsb4nnkj](https://youtu.be/EIkVJb_sCKI?si=okHOxgO6Tsb4nnkj).

Walter<sup>53</sup>, who served in Iraq and now lives in rural Texas, get and stay connected. And at its peak, the ACP program had double the enrollees than the Lifeline program. ACP's overperformance was in large part due to the larger benefit size (\$30 vs \$9.25), but also the resources dedicated to outreach and enrollment support from trusted institutions like NDIA affiliates, and universal provider participation.<sup>54</sup> The Joint Commenters urge the Commission to evaluate the ACP program to learn lessons from its success to improve the Lifeline program's enrollment rates and efficacy.

Additionally, universal Service goals must account for evolving communications technology and continue to support core communications services, such as voice and text. Current Lifeline subscribers report that all three services are equally important to them.<sup>55</sup> Traditional phone service (voice) remains critical for access to emergency services, work activities, and social connections.<sup>56</sup> Text capabilities also remain an essential communication tool for a variety of reasons, including basic communication for people living with disabilities and emergency responses during crises like natural disasters, mass emergencies, and violent threats.<sup>57</sup> Additionally, households increasingly rely on data-intensive applications such as telehealth, online education, videoconferencing, and AI-enabled tools that demand robust speeds and low latency. For Lifeline to be cost-effective and fulfill its role in supporting universal service, the

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<sup>53</sup> The National Digital Inclusion Alliance. "Walter's Online with ACP, & He's Connecting More Texas Veterans" (Jan 4, 2024), <https://www.youtube.com/watch?v=9ZRVo6e1gO0>.

<sup>54</sup> Jericho Casper, "Affordable Connectivity Program Reached More Than Twice the Families of Lifeline," Broadband Breakfast" (September 15, 2025), <https://broadbandbreakfast.com/affordable-connectivity-program-reached-more-than-twice-the-families-of-lifeline/>.

<sup>55</sup> National Lifeline Association (NaLA), "Annual Consumer Survey" (Jan. 31, 2025), <https://nalalifeline.org/blog/nala-releases-findings-from-annual-consumer-survey/>.

<sup>56</sup> Broadband Connects America, In the Matter of Report on the Future of the Universal Service Fund (Feb. 17, 2022), <https://www.fcc.gov/ecfs/document/10218267182830/1>.

<sup>57</sup> Federal Communications Commission, "What You Need to Know About Text-to-911," <https://www.fcc.gov/consumers/guides/what-you-need-know-about-text-911>.

benefit must be substantial enough to fill the growing data and bandwidth needs of our most vulnerable families.

Overall, both mobile and home broadband services are essential for households to fully participate in everyday modern life. Mobile broadband plans often have data caps or bandwidth limits that inhibit performance, but provide connectivity in and outside one's home. Home broadband subscriptions allow an individual to complete more complex tasks when paired with a laptop or desktop, including data analysis using spreadsheets or other statistical software, graphic design, or applying for jobs.<sup>58</sup> They are complementary technologies and are not interchangeable.

## **VII. The Commission Must Take Steps to Reduce Friction in the Enrollment Process.**

Lifeline, like many other programs meant to provide a safety net for low-income households, have barriers to the enrollment process that discourage people who have limited time to navigate the process from applying and ultimately benefiting from programs that can transform their lives. According to USAC, in 2025, the National Verifier made eligibility decisions on 15 million Lifeline applications. As was previously stated by the Joint Commenters, in the fourth quarter of 2025 alone, the National Verifier received 4.5 million applications and more than 2.7 million applications were determined to be “not qualified because they did not meet the program criteria and were not resolved by the applicant within 45 days.”<sup>59</sup> People who are most in need of programs like Lifeline are burdened by the “time tax” or “a levy of paperwork, aggravation, and mental effort imposed on citizens in exchange for benefits that putatively exist to help them.”<sup>60</sup> As a 2021 GAO Report found, “more than two-thirds of new

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<sup>58</sup> Colby Humphrey, Elizabeth A. Mack, and John B. Horrigan, "Moving toward a continuum model of broadband affordability for low-income households," Telecommunications Policy (2025), <https://doi.org/10.1016/j.telpol.2025.103027>.

<sup>59</sup> Universal Service Administrative Company, “Lifeline National Verifier Quarterly Eligibility” (Dec. 2025), <https://www.usac.org/wp-content/uploads/lifeline/documents/Data/2025-Q4-National-Verifier-Quarterly-Eligibility-Data.pdf>.

<sup>60</sup> Annie Lowrey, “The Time Tax: Why is so Much American Bureaucracy Left to Average Citizens?” *The Atlantic* (Jul. 27, 2021), <https://www.theatlantic.com/politics/archive/2021/07/how-government-Learned-waste->

applicants and reverification applicants who went through the manual review process abandoned their applications.”<sup>61</sup> Similarly, a study by Education SuperHighway found, as it relates to the Affordable Connectivity Program, that “45% of ACP applicants are rejected, and many more simply abandon the complex, time-consuming process. Specific challenges include providing the necessary documentation to prove eligibility, language barriers, and a lack of the digital skills required to navigate the online application process.”<sup>62</sup> As ACP’s application process was similar to the Lifeline program’s, it is further evidence that, “many programs meant to aid the poorest of the poor have demeaning, invasive, and time-consuming screening requirements.”<sup>63</sup> The Joint Commenters urge the Commission to follow the Open Technology Institute at New America’s recommendation to “further [integrate] enrollment and verification processes in the course of designing an affordability program” and to “take into consideration how easy it is to provide proof of each eligibility method, whether eligibility can be automatically verified through existing federal and state databases, and how much funding should be directed towards integrating additional state and federal databases.”<sup>64</sup>

#### **VIII. The Commission Should Leverage the Role of the Consumer and Governmental Affairs Bureau Through Outreach Efforts.**

The Joint Commenters support outreach efforts for the Lifeline program. As was the case with the ACP, many digital inclusion organizations, often operating these efforts with little or no funding, promoted the program within their communities. These groups guided clients through

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[your-time-tax/619568/](#).

<sup>61</sup> Government Accountability Office (GAO), “FCC Has Implemented the Lifeline National Verifier but Should Improve Consumer Awareness and Experience” (Jan. 2021), <https://www.gao.gov/assets/gao-21-235.pdf>.

<sup>62</sup> Education Superhighway, “No Home Left Offline: Accelerating Affordable Connectivity Program Adoption: How Local Action Can Close the Broadband Affordability Gap” (2022), [https://www.educationsuperhighway.org/wp-content/uploads/No-Home-Left-Offline\\_Accelerating-ACP-Adoption\\_2022.pdf](https://www.educationsuperhighway.org/wp-content/uploads/No-Home-Left-Offline_Accelerating-ACP-Adoption_2022.pdf).

<sup>63</sup> *Id.*

<sup>64</sup> Raza Panjwani, Sarah Forland, and Jessica Dine, “Broadband Affordability: Removing a Roadblock to Universal Service: Lessons from the Affordable Connectivity and Lifeline Programs, New America” (Nov. 7, 2024), <https://www.newamerica.org/insights/broadband-affordability-removing-a-roadblock-to-universal-service/>.

the enrollment process, assisted them in overcoming any enrollment-related challenges, and, when the program expired, helped their constituents understand which alternative options were available, including the Lifeline program.<sup>65</sup> In response to the successful efforts in getting these communities connected to affordable broadband, the Joint Commenters strongly urge the FCC to establish a grant program to enable outreach and enrollment efforts in Lifeline through the Consumer and Governmental Affairs Bureau (“CGB”). In addition to funding outreach and enrollment activities, such a program should educate consumers regarding predatory sales tactics and misinformation, facilitate customer choice, and ensure outreach neutrality. This program should also ensure that reliable information about the program is widely disseminated and facilitates enrollment. The Joint Commenters also urge the FCC to require grantees to demonstrate a proven track record of effectively serving their community.<sup>66</sup> Organizations with such a record can conduct grant-funded activities impartially, because they are not vested in applicants' choices. Further, grantees who provide digital inclusion programming possess valuable information about low-cost internet options that can help community members maintain connectivity and access devices and digital skill training.

The Commission must properly support these grantees so they can successfully inform and enroll participants in Lifeline. Similar to the “Your Home, Your Internet” and “ACP Navigator” pilot programs, the FCC should require USAC to provide approved grantees who meet established requirements with access to the National Verifier, which will help eligible Lifeline participants with the application process.<sup>67</sup>

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<sup>65</sup>Amy Huffman, “The Affordable Connectivity Program is Popular because it Works,” National Digital Inclusion Alliance (Apr. 22, 2024), <https://www.digitalinclusion.org/blog/the-affordable-connectivity-program-is-popular-because-it-works/>.

<sup>66</sup> National Digital Inclusion Alliance on the Implementation of the Affordable Connectivity Program (Dec. 9, 2021), <https://www.fcc.gov/ecfs/search/search-filings/filing/1031637767104>.

<sup>67</sup> Your Home, Your internet Third Report and Order, 87 FR 54401, 12-14 (Sept. 6, 2022).

Also, digital navigators have found that the most successful outreach and enrollment strategies for broadband benefit programs are high-touch, time-intensive, personalized, and require significant staff time to implement. For example, one NDIA affiliate registered over 600 households for the Emergency Broadband Benefit through street teams. The teams comprised 12 people, two coordinators, and 10 supporting people. While this effort was fruitful, it was time-consuming, labor-intensive, and costly. This is an example of a local outreach effort necessary to reach and provide enrollment support to eligible households.<sup>68</sup>

The grant program should also be structured so that its application process, reporting requirements, and financial requirements are as unburdensome to subgrantees as possible. Wherever possible, the FCC should provide additional support for small organizations that are trusted in their communities but have limited capacity to participate in large, federal grant programs.<sup>69</sup> These grants should provide a portion of the funding to awardees up front, because a reimbursement process that requires a small organization to provide all resources up front would prevent many organizations with limited resources from participating. The grant award should be at least \$50,000, as the application and administration of a smaller award would inhibit small organizations with limited resources from participating due to the outsized administrative costs. The grant term should be at least two years to limit the administrative burden for the grantee and to ensure ample time to close the digital divide in low-income communities.<sup>70</sup> In addition, the FCC should create shared resources for grantees, including but not limited to: program trainings, toolkits with shared informational and educational materials in many languages that simply describe the program in a multitude of languages, and other outreach materials.<sup>71</sup>

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<sup>68</sup> National Digital Inclusion Alliance on the Implementation of the Affordable Connectivity Program (Dec. 9, 2021), <https://www.fcc.gov/ecfs/search/search-filings/filing/1031637767104>.

<sup>69</sup> *Id.*

<sup>70</sup> *Id.*

<sup>71</sup> Universal Service Administrative Company, “Advertise Lifeline,” <https://www.usac.org/lifeline/rules-and-requirements/advertise-lifeline/>.

Lastly, previous outreach grants provide a solid foundation for developing new outreach grant initiatives. Acknowledging that individual provider offerings may not suit every consumer is essential. These grants demonstrate the necessity of a neutral approach to ensure consumers are not steered toward specific products. In line with the ACP Outreach Grant Program Notice of Funding Opportunity, the Joint Commenters recommend that any future outreach programs require grantees to maintain neutrality and prohibit service provider in-kind contributions, commissions, or compensation linked to program applications or enrollment.<sup>72</sup>

Lastly, to complement the Commission’s authority to establish such programs, the FCC should also work with Congress on additional solutions. For example, the recently introduced *Promoting Access to Broadband Act* would provide a pathway to formalize and fund outreach and enrollment efforts at scale, which could reinforce the important work being carried out in states by trusted organizations in states with low Lifeline enrollment.<sup>73</sup>

## **IX. Conclusion**

Lifeline remains an important program to connect the nation’s low-income consumers to vital voice and broadband services. Due to the ongoing affordability crisis, the Commission must use its authority to better ensure the program meets the needs of consumers in the modern-age. Unfortunately, the tone and substance (to the extent it exists) in this proceeding are guided by misguided political motivations meant to vilify the nation’s most vulnerable consumers and to catastrophize and misinterpret the “waste, fraud, and abuse” narrative. The Commission should instead allocate its resources and time to identify why Lifeline remains underutilized and remedy

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<sup>72</sup> Federal Communications Commission Consumer and Governmental Affairs Bureau, Notice of Funding Opportunity: Affordable Connectivity Outreach Grant Program, FCC-ACOGP-23-001 (32.011).

<sup>73</sup> Durbin, Rep. Kelly Introduce Bicameral Bill To Increase Access To Broadband Service For Americans (April 28, 2026), <https://www.durbin.senate.gov/newsroom/press-releases/durbin-rep-kelly-introduce-Bicameral-Bill-to-increase-access-to-broadband-service-for-americans>.

those issues by better protecting consumers, expanding outreach efforts, and easing the enrollment process.

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