

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

In the Matter of)	
)	
Wireline Competition Bureau Seeks)	WC Docket No. 20-445
Comment on Emergency Broadband)	
Connectivity Fund Assistance)	

COMMENTS OF THE EMERGENCY BROADBAND BENEFIT CARRIERS

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SUMMARY

The EBB Carriers participating in these comments provide Lifeline benefits throughout many urban and rural areas in the United States, including Tribal lands. To quickly operationalize the 2021 Appropriations Act provisions creating an Emergency Broadband Benefit Program, the Commission must draw upon existing Lifeline rules and procedures to the greatest extent possible. This will enable Lifeline providers to quickly adapt existing internal procedures and avoid inefficiencies associated with separate compliance requirements.

The Commission should permit existing Lifeline providers to elect to participate in the EBB Program throughout a state, including areas where a carrier provides service but has not been designated as an ETC, without the added step of filing an application. Again, this will accelerate the commencement of services to citizens who may not have Lifeline options and are suffering from the pandemic's economic impact.

With respect to the two new qualifying programs specified in Section 904(a)(6)(B), the Commission should direct USAC to add them to the list of qualifying programs within NLAD at the earliest possible date. This will promote efficient program administration and minimize program waste that can occur in the manual verification process.

The Commission should provide as much direction as possible to assist EBB carriers in meeting compliance obligations. In particular, the statute is vague concerning what constitutes a substantial loss of income in cases where a customer does not present a furlough notice or application for unemployment benefits. Given that the statute creates a safe harbor for carriers acting in good faith to manually verify customer documents, the Commission should

clarify that carriers are not required to conduct investigations to determine whether such documents are genuine.

It would be a good policy choice for the Commission to clarify that EBB Program participants may obtain the benefit of any reduction in price or increase in data allowances implemented by carriers after December 1, 2020, and as the EBB Carriers read the statute, it is permitted.

With respect to eligible services, the statute adopts the definition of broadband set forth at 47 U.S.C. § 8.1(b). The Commission must avoid setting a different definition that inadvertently denies citizens living in remote areas access to EBB benefits that Congress intended for them to have. Similarly, while the statute defines what devices, and how many, can be funded through the EBB Program, the Commission should use universal service support to provide one or more additional devices to households having more than one school-age child, as well as authorize universal service funds for the purchase of a Mi-Fi device.

On Tribal lands, the Commission should clarify that EBB Program benefits will be made available using the Tribal lands definition in Section 54.400(e) of the Commission's rules, *and* in the three types of off-reservation lands designated in the recently adopted 5G Fund Order.

The EBB Carriers urge the Commission to adopt a mechanism to notify EBB carriers, who can in turn notify customers, as funds deplete. Effective communication with affected citizens is an essential element to program success.

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COMMENTS OF EMERGENCY BROADBAND CARRIERS

The Emergency Broadband Benefit Carriers (“EBB Carriers”), by counsel, and pursuant to the Commission’s *Public Notice*, DA 21-6 (Jan. 4, 2021), hereby submit these comments in the above-captioned proceeding.¹ EBB Carriers are all established commercial wireless carriers providing fixed and mobile telecommunications services across the United States.² All have qualified as eligible telecommunications carriers (“ETCs”) in some or all of their authorized service areas and all intend to participate in the Emergency Broadband Benefit (“EBB”) Program established by Congress in the Consolidated Appropriations Act of 2021.³

I. INTRODUCTION.

Within the 2021 Appropriations Act, Congress enacted the EBB to deliver immediate and substantial assistance to households adversely affected by the COVID-19 pandemic. With

¹ *Wireline Competition Bureau Seeks Comment on Emergency Broadband Connectivity Fund Assistance*, Public Notice, DA 21-6, WC Docket No. 20-445 (Jan. 4, 2021) (“*Public Notice*”).

² EBB Carrier members are United States Cellular Corporation, Smith Bagley, Inc. (“SBI”), Cellular South, Inc. and Cellular South Licenses, LLC (collectively, “C Spire”), Union Telephone Company dba Union Wireless, NE Colorado Cellular, Inc., dba Viaero Wireless, and East Kentucky Network, LLC.

³ H.R. 133: Consolidated Appropriations Act, 2021 [Including Coronavirus Stimulus & Relief], Pub. L. No. 116-260, H.R. 133, 116th Cong. (2020) (“*2021 Appropriations Act*”).

almost every aspect of Americans' lives upended, remote access through a broadband connection to work, school, government, family and friends, are all essential elements to coping with the pandemic.

While the EBB Program provides substantial additional support to affected households, the statute requires agency expertise to operationalize numerous aspects outlined in the statute. With so little time between the law's enactment and the deadline for implementation,⁴ EBB Carriers' comments below reflect the need for simplicity and, to the greatest extent possible, the use of familiar procedures within the Lifeline program to enable participating carriers to meet consumer and FCC expectations, while also enabling the Commission to efficiently manage the program and enforce its rules.

II. PARTICIPATING IN THE EBB PROGRAM.

A. Existing ETCs Should be Permitted to Participate by Election Throughout a State Where They Are Designated.

As the Commission acknowledges, existing carriers that have been designated as ETCs are automatically eligible to provide EBB benefits. For ETCs electing to participate, EBB Carriers recommend a simple process whereby the ETC submits an election notice to the Universal Service Administrative Company ("USAC") containing the information specified in the *Public Notice*:⁵

- (1) the states in which it plans to participate and a statement that it is an ETC in good standing in each;

⁴ The 2021 Appropriations Act, §904(c)(1), provides a 60-day window for the Commission to promulgate regulations implementing the program.

⁵ See *Public Notice* at p. 2.

- (2) a statement that, in each such state, it was a “broadband provider” within the meaning of the 2021 Appropriations Act as of December 1, 2020;
- (3) whether it seeks to participate in each state because it is either a designated ETC or is seeking designation by the Commission to participate (or both);
- (4) whether the provider intends to distribute connected devices in each such state;
- (5) a description of any Internet service offerings for which it plans to seek reimbursement in each state,
- (6) documentation demonstrating the standard rates for the services for which it may claim reimbursement; and
- (7) Submission of an ETC’s FRN and 498 ID (SPIN) to expedite USAC’s ability to coordinate the ETC’s election.⁶

If any aspect of the submitted materials is found to be deficient, USAC may insist on corrections before any EBB Program reimbursements are authorized.

EBB Carriers recommend that the Commission allow ETCs with an established record of compliance – such as ETCs that have not been subject to forfeiture penalties for failure to comply with Lifeline or other Universal Service Fund regulations – to begin offering EBB program discounts immediately upon submitting an election. Importantly, ETCs with an established track record are in the best position to move quickly and are least likely to present compliance problems. Established participants in the Lifeline program have ample incentive to maintain their good standing and have historically presented the Commission with few compliance or enforcement issues. Allowing such carriers to move immediately will promote

⁶ See *Public Notice* at p. 3.

rapid implementation and is consistent with Congressional recognition that the problems presented by the pandemic constitute an emergency, requiring prompt action.

In some cases, a carrier is not designated as an ETC throughout the entirety of its service area in a particular state.⁷ In such a case, EBB Carriers support the Commission’s proposal to require the carrier to offer EBB “across all of its service areas in each of the states in which it is approved to participate.”⁸ Some EBB Carriers have been designated as ETCs in portions of a state, sometimes resulting in a patchwork of ETC-eligible areas. By allowing ETCs to offer EBB Program benefits throughout their service areas in a state, the Commission will avoid the confusion that results when an eligible consumer applies for discounted service, only to be told that their home is located in an ineligible area.

In the case of most wireless carriers, service offerings, terms and conditions are uniform throughout the network in any state, so there are no variances to be accounted for between ETC and non-ETC areas.⁹ Affected citizens living in non-ETC areas will be touched by advertising and see the same EBB outreach materials. A carrier will be able to extend the EBB to households in non-ETC areas without any significant changes to its business, other than offering only EBB discounts (and not Lifeline) to households located outside of the ETC service area.

⁷ For example, new wireless coverage may have been constructed or acquired, or ETC may have been designated for only certain portions of its service territory to meet legacy high-cost program requirements.

⁸ *Public Notice* at p. 4.

⁹ See *2020 Communications Marketplace Report*, FCC 20-188, GN Docket No. 20-60 (rel. Dec. 31, 2020) at ¶137, n.188 (“The pricing analysis included in this section shows that mobile service providers offer nationwide pricing plans available throughout their service area, with no pricing disparity between rural and urban markets”).

Accordingly, an ETC with an established track record of compliance, offering uniform rates and terms throughout a state, should be permitted to elect to participate in the EBB Program throughout its service area in the state, and be automatically authorized to extend EBB benefits throughout such area.

B. Non-ETCs Should Participate After Grant of an Application That Includes a Compliance Plan.

Pursuant to Section 904(d)(2) of the *2021 Appropriations Act*, carriers that are not ETCs must obtain Commission approval to participate in the EBB Program. EBB Carriers recommend that the Commission adopt the proposals set forth in the *Public Notice* to require an application setting forth the same information as an election, along with a compliance plan that memorializes the applicant's commitments to prevent program abuse, and documentation of an established program in a state if automatic approval is being sought.¹⁰ Carriers without experience in Lifeline or other established discount programs must submit to a deeper review so that the Commission may demonstrate to Congress that it has taken reasonable steps to ensure that only qualified carriers that understand their compliance obligations participate in the EBB Program.

¹⁰ See *Public Notice* at p. 5.

III. OPERATIONAL ISSUES WITHIN THE EBB PROGRAM

A. Adopting Existing Lifeline Procedures Will Enable Participating Carriers to Accurately Verify Customer Eligibility.

Ensuring that households are eligible to participate in the EBB Program is an essential element of the Commission's compliance mandate.¹¹ To the greatest extent possible, the Commission's existing Lifeline procedures should be leveraged to minimize program waste, maintain simplicity for carriers and the FCC, increase carrier compliance, and minimize the Commission's costs in meeting requirements set forth in the statute.¹² The Lifeline procedures for subscriber eligibility determination and certification set forth in the Commission's Lifeline rules should be incorporated into EBB eligibility determinations and compliance obligations.¹³

Under Section 904(a)(6) of the 2021 Appropriations Act, households eligible for Lifeline benefits under 47 C.F.R. § 409(a) or (b) are eligible for an EBB Program discount. Existing Lifeline subscribers have already demonstrated eligibility through the initial Lifeline intake processes, either having been enrolled via the National Verifier or confirmed via the reverification process, and they are subject to the Commission's Lifeline annual recertification process. Accordingly, the Commission should allow carriers to immediately offer existing Lifeline households all available EBB Program benefits.

¹¹ See 2021 Appropriations Act, §904(b)(2), (b)(3).

¹² This will also assist the Commission in complying with obligations under the CARES Act accountability measures. See *Public Notice* at p. 13. When Lifeline program rules, procedures, and norms are applied consistently, existing ETCs as well as newcomers will find it easier to maintain compliance and those involved in audits/enforcement will be able to perform their tasks more efficiently.

¹³ See, e.g., 47 C.F.R. §§ 54.404, 405 and 410.

With respect to new households qualifying through the broadened EBB list of programs, EBB Carriers implore the Commission to quickly adjust existing Lifeline mechanisms to take advantage of the substantial institutional knowledge contained within USAC and within all ETCs familiar with Lifeline procedures. With respect to the two new qualifying programs specified in Section 904(a)(6)(B),¹⁴ the Commission should direct USAC to add them to the list of qualifying programs within NLAD at the earliest possible date.¹⁵ Other adjustments to NLAD, such as making the SAC field optional,¹⁶ should be relatively simple.

When carriers make the eligibility determination, EBB Carriers support a requirement to retain documentation, to assist the FCC/USAC in their audit responsibilities. New households qualifying solely through new programs specified in the statute should provide a document demonstrating participation that can be maintained by the carrier for audit purposes. With respect to recordkeeping for verifications done by the carrier, copies of any documents used in resolving third-party identity verification (“TPIV”) or similar issues, and any documentation proving eligibility, should be retained.

Incorporating as much of the verification process as possible into the National Verifier and NLAD systems and simplifying manual processes will be key to enabling carriers to meet

¹⁴ Richard B. Russell National School Lunch Act (42 U.S.C. § 1751 et seq.) or the school breakfast program under section 4 of the Child Nutrition Act of 1966 (42 U.S.C. § 1773).

¹⁵ Currently, USAC’s NLAD input template accepts eligibility codes E1-E16 reflecting the ways to qualify for Lifeline. The Tribal-specific programs are included and are highlighted on USAC’s Enrollment Eligibility Code guide. The two new school meal programs could be added as E17 and E18. See https://www.usac.org/wp-content/uploads/lifeline/documents/nlad/Handout_Enrollment-Eligibility-Codes.pdf.

¹⁶ See <https://www.usac.org/wp-content/uploads/lifeline/documents/RAD/NV-NLAD-Field-Descriptions.pdf>.

compliance goals and giving auditors clean paper trails to work with. Carriers currently participating in the Lifeline program already have systems and processes in place to verify and recertify customers through the National Verifier and NLAD and to file reimbursements for customer discounts. However, many do not have the personnel or facilities in place to begin large-scale processing of manual verification requests. Accordingly, folding as much of the new EBB Program into existing Lifeline procedures and linking the new program databases specified in the statute to the National Verifier and NLAD will serve the public interest by increasing carrier compliance while reducing the Commission's audit burdens.

The Commission should provide as much direction as possible to assist EBB Carriers in meeting compliance obligations. For example, the Commission should provide direction on what constitutes a "substantial loss of income since February 29, 2020" to assist EBB Program participants in determining whether a household is eligible.¹⁷ The statute is clear that an applicant is eligible if it provides documentation of a layoff or furlough notice, or an application for unemployment insurance benefits, however an applicant is also permitted to provide "other similar documentation."¹⁸ It would help both carriers and the Commission to have clarity on what "other similar documentation" is sufficient to qualify a customer.

It is noteworthy that the statute creates a safe harbor from enforcement actions if a participating carrier relies in good faith on information provided to it by any third party.¹⁹ The

¹⁷ See *2021 Appropriations Act* at § 904 (a)(6)(C).

¹⁸ *Id.*

¹⁹ See *2021 Appropriations Act* at § 904 (j).

Commission should clarify that EBB Program participants may rely on documentation provided and that carriers are not required to go behind documents presented and conduct investigations to determine whether such documents are genuine. For EBB Carriers, clarity regarding what documentation is acceptable will give the safe harbor meaning. For the Commission, it will reduce program waste and the potential for consumer fraud.

B. Use the Existing Definition of Household and Retain Existing Procedures to Prevent Duplicates.

Without a consistent definition and set of procedures for minimizing multiple reimbursements to a single household that are consistent with the Lifeline program, it will be almost impossible for carriers to maintain compliance. The term “household” (which Congress did not define) must be defined as currently set forth at 47 C.F.R. § 54.400(h), and the procedures for preventing duplicative support must be made identical, including the use of a Lifeline Household Worksheet as set forth at 47 C.F.R. § 54.410(g).

C. The Statute Permits Carriers to Offer Lower Prices Than Those Offered on December 1, 2020.

The Commission asks for comment on the most efficient method for having providers submit standard rate information.²⁰ Carriers should submit a .pdf document containing all of the rates for qualifying broadband service being offered as of December 1, 2020, along with a copy of the applicable terms and conditions for those plans.

The Commission asks how to address promotional rates in effect as of December 1, 2020. If the promotional rate in effect as of December 1, 2020 remains available, then a

²⁰ *Public Notice* at p. 3.

customer should be able to choose it, however a carrier providing service to a customer taking service under a promotional rate should not be permitted to claim a reimbursement for an amount greater than the promotional rate.

An important question is whether a carrier should be locked into providing EBB Program participants the rates offered as of December 1, 2020. EBB Carriers submit that the statute does not have such a limitation. The statute defines the “standard rate” as the “monthly retail rate” as of December 1, 2020 (§ 904(a)(13)). The statute requires the benefit provided to be applied to the actual amount charged, “which shall be *no more than* the standard rate....” (§ 904(a)(7), emphasis ours). This implies that the amount charged could be less than the standard rate. The statute also states that an Internet service offering means service “offered in the same manner, and on the same terms” as described in offerings available on December 1, 2020 (§ 904(a)(9)). Notably, the statute does not state that EBB recipients may only choose from those rate plans offered as of December 1, 2020.

To give meaning to Section 904(a)(7), a carrier must be permitted to lower its rate, either by lowering its price or increasing the quantity of service provided for the same price. In so doing, a reduced price offering would be made available “in the same manner” as described in offerings as of December 1, 2020. As long as the terms and conditions do not change, the Commission could conclude that the offering is on the “same terms,” giving meaning to all parts of the statute.

Were the Commission to prohibit a carrier from lowering its price or increasing its data quantity, or both, it would effectively write Section 904(a)(7) out of the statute,²¹ denying EBB customers the benefit of any price improvements that might occur after December 1. It would be good policy to permit EBB Program participants to get the benefit of better rates offered to retail customers.

Accordingly, the Commission should permit carriers participating in the EBB Program to reduce the rate that an EBB customer pays from those specified for equivalent rate plans on December 1, 2020. A carrier lowering prices below those offered on December 1, 2020 should be required to submit that information as an amendment to its initial election or application.

D. The Commission Must Not Narrow Congress' Definition of Broadband; It Should Use Universal Service Support to Provide Additional Devices.

The Commission seeks comment on whether it should provide further clarity regarding services that are eligible for reimbursement in the EBB Program.²² EBB Carriers caution against any narrowing of the statute's definition of broadband internet access service as set forth in the Commission's rules:

Broadband internet access service is a mass-market retail service by wire or radio that provides the capability to transmit data to and receive data from all or substantially all internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service, but excluding dial-up internet access service.²³

²¹ By providing that the amount charged shall be "no more than" the standard rate, Section 904(a)(7), by definition, permits the amount charged to be less than the standard rate.

²² *Public Notice* at p. 8.

²³ *See* 47 C.F.R. § 8.1(b).

In addition to implementing the intent of Congress as expressed in the statute, the Commission must avoid setting requirements that inadvertently deny citizens living in remote areas access to EBB benefits. While 3G networks operating in remote areas can deliver throughput that supports video conferencing platforms and other software essential to full participation in online learning, setting standards that disqualify households from accessing EBB benefits on a network that otherwise meets the definition at 47 C.F.R. § 8.1(b) would contravene a core Congressional objective of increasing the availability and quantity of broadband to all Americans during this emergency period.

With respect to devices, EBB Carriers urge the Commission to maintain consumers' ability to choose from a broad array of devices, as there are a wide variety of needs. Many households have school-age children with specific needs for learning, while others do not. These other households have work, medical, social, and emergency communications needs that favor an EBB Program that permits a wide variety of devices to be eligible for reimbursement. EBB Carriers believe Congress' broad use of the word "tablet" is consistent with this concept and that households should be permitted to choose devices that meet their individual needs.

Section 904(b)(5) of the 2021 Appropriations Act limits reimbursement to "no more than 1 connected device per eligible household." The Commission should authorize the provision of one or more additional devices to certain households, using universal service funds. For example, where a household has more than one school-age child, each requires a device to connect to remote classroom functions. Accordingly, the Commission should, *sua sponte*, determine how best to provide one or more additional devices to those households

able to demonstrate that there are multiple school-age children attempting to attend classes remotely.

The Commission should also consider authorizing Lifeline program support to fund MiFi devices. A MiFi device acts as a hotspot by turning commercial wireless service into Wi-Fi, giving multiple people in the household access to the Internet. MiFi devices can be extremely useful for low-income households lacking modems and routers, and should be considered eligible for Lifeline support in households receiving the EBB Program benefit, especially those with school-age children.

E. It is Critical That the Definition of Additional Tribal Lands Adopted in the 5G Fund Order be Applied to the EBB Program.

The Commission proposes to use the same definition of Tribal lands as used in the Lifeline program and to allow members of households on such Tribal lands to use their participation in the same Tribal programs permitted under the Lifeline program to qualify for the EBB, in addition to other permitted means of qualifying.²⁴ As discussed above, EBB Carriers support aligning the new EBB Program with existing Lifeline rules as much as possible, including aligning the definition of Tribal lands eligible for the EBB Program.

Importantly, the applicable Lifeline rule defining Tribal lands for purposes of the Lifeline program, 47 C.F.R. § 54.400(e), does not specifically include the three types of lands that the Commission recently designated as Tribal lands for purposes of the Commission's high-cost

²⁴ See *Public Notice* at p. 10.

programs.²⁵ Today, carriers such as SBI are eligible to provide Tribal Lifeline benefits in certain areas, such as the Eastern Navajo Agency, not by the rules or any specific designation, but rather pursuant to waivers granted by the Commission dating back to 2005.²⁶

Accordingly, the Commission should clarify that EBB Program benefits intended for Tribal lands will be made available on Tribal lands as defined in Section 54.400(e) of the Commission's rules, *and* in the three types of off-reservation lands designated in the 5G Fund Order.²⁷

The Commission also proposes to use the processes USAC has in place for identifying the location of a consumer's residence within the Lifeline program. EBB Carriers agree with this proposal.

The Commission asks whether there other accommodations the Commission should consider to ensure that eligible households on Tribal lands and the providers that serve them are able to participate in the EBB Program. EBB Carriers urge the Commission to consider that

²⁵ See *Establishing a 5G Fund for Rural America*, Report and Order, FCC 20-150, 2020 WL 6381425 (2020) ("*5G Fund Order*") at ¶¶ 40-44.

²⁶ See *Federal-State Joint Board on Universal Service; Smith Bagley, Inc. Petition for Waiver of Section 54.400(e) of the Commission's Rules*, Memorandum Opinion and Order, 20 FCC Rcd 7701 (2005).

²⁷ See *5G Fund Order, supra*, at ¶ 41. These lands are, (1) any federally recognized off-reservation trust lands, Tribal designated statistical areas (TDSAs), or joint use areas from the Census Bureau's American Indian, Alaska Native, and Native Hawaiian boundaries, (2) those areas within the study area boundaries of the Eastern Navajo Agency and Sacred Wind Communications in New Mexico to allow so-called "checkerboard" Tribal and non-Tribal land areas in this section of New Mexico to be aggregated as Tribal lands for purposes of the high-cost program, including the 5G Fund, consistent with past Commission waivers, and (3) any areas within the geographic boundaries reflected in the Historical Map of Oklahoma (1870-1890), including the Cherokee Outlet, consistent with the Commission's interpretation of the "former reservations in Oklahoma" in section 54.400(e).

the pandemic is getting worse right now, not better.²⁸ Tribal communities have been hit hardest and citizens have suffered the effects of lockdowns on a scale much greater than most of the rest of the nation.²⁹ On each of the Tribal lands it serves, SBI remains unable to provide services in the ordinary course, due to store closings, social distancing measures, and work from home orders. Under these conditions, it is exceedingly difficult to do effective outreach, manage the many people who prefer to do business in person, and in general, manage compliance obligations.

Accordingly, EBB Carriers ask the Commission to extend to the EBB Program the various accommodations that have been made for carriers providing Lifeline service, including the temporary waiver of documentation requirements for subscribers residing in rural areas on Tribal lands.³⁰

F. Appropriate Notice to Carriers and Consumers Regarding Fund Depletion is Essential.

With \$3.2 billion in available funds, and no certainty that Congress will extend the program during the COVID-19 emergency, the Commission must develop a mechanism to notify EBB carriers, who can in turn notify customers, as funds deplete. EBB Carriers suggest a

²⁸ See Smith Bagley, Inc., *Request for Six-Month Extension of COVID-19 Lifeline Relief*, WC Docket No. 11-42 (filed Jan. 13, 2021), available at <https://www.fcc.gov/ecfs/filing/10113077958517>.

²⁹ For example, the White Mountain Apache Tribe Emergency Operations Center posted a list of COVID-19 emergency actions taken to date, including 43 days of lockdown/shelter in place status, 28 of which have occurred since November 6, 2020. See <https://www.facebook.com/White-Mountain-Apache-Tribe-Emergency-Operations-Center-103417867996160/photos/pcb.230343025303643/230342998636979> (viewed Jan. 15, 2021).

³⁰ See *Lifeline and Link Up Reform and Modernization*, Order, DA 20-577, 2020 WL 2844870 (WCB rel. June 1, 2020) (permitting ETCs on Tribal lands to immediately begin providing Lifeline-supported service to a consumer, whereupon the consumer will have 45 days to provide eligibility documentation).

monthly public notice announcing the amount of funds expended in the past month, along with a cumulative total. At such time as the Commission believes the fund to be within 90 days of exhausting, it should release a public notice so that carriers may begin to notify customers that the EBB benefit is expected to expire in the near future. This level of transparency will minimize consumer harm, and reduce confusion and complaints as the EBB Program concludes.

IV. CONCLUSION.

The Emergency Broadband Benefit Carriers appreciate the opportunity to submit these comments and urge the Commission to adopt the recommendations set forth above.

Respectfully submitted,
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