

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

In the Matter of)	
)	
Lifeline and Link Up Reform 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
NTCA–THE RURAL BROADBAND ASSOCIATION
AND
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

I. INTRODUCTION

NTCA–The Rural Broadband Association (“NTCA”)¹ and the National Rural Electric Cooperative Association (“NRECA”)² (collectively “the Associations”) hereby submit these comments in response to the Notice of Proposed Rulemaking (“NPRM”) released by the Federal Communications Commission (“Commission”) in the above-captioned proceeding.³ The NPRM

¹ NTCA represents approximately 850 independent, community-based companies and cooperatives that provide advanced communications services in rural America and more than 400 other firms that support or are themselves engaged in the provision of such services.

² NRECA represents nearly 900 not-for-profit rural electric cooperatives that provide reliable, affordable power to 42 million consumers across 48 states. Rural electric cooperatives serve 88% of U.S. counties, including 92% of the nation’s persistent poverty counties. More than 200 NRECA members are actively involved in broadband deployment efforts, bringing connectivity to areas that other service providers have deemed too difficult or costly to serve.

³ *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42 *et al.*, Notice of Proposed Rulemaking, FCC 26-8 (rel. Feb. 23, 2026).

proposes comprehensive reforms to the Lifeline program aimed at enhancing program integrity, combating waste, fraud, and abuse, and ensuring that Universal Service Fund (“USF”) dollars are directed to eligible low-income Americans.

NTCA and NRECA share the Commission’s commitment to these goals. The Associations’ collective members serve as the sole or primary Lifeline wireline provider in many of the nation’s most remote, economically disadvantaged, and costly-to-serve rural communities, and they have a direct stake in ensuring the program operates with integrity and efficiency. These small, community-based providers have longstanding relationships with the subscribers they serve and a strong record of responsible program participation. With this shared commitment as context, NTCA and NRECA urge the Commission to leverage the program infrastructure it has already built through the National Verifier and the Universal Service Administrative Company (“USAC”) to implement the reforms proposed in this proceeding. The Commission should not layer new compliance obligations onto individual carriers where centralized administration would be more effective and less costly.

II. THE NATIONAL VERIFIER AND USAC SHOULD BEAR THE RESPONSIBILITY FOR ADDITIONAL VERIFICATION REQUIREMENTS

The Commission created the National Verifier to serve as a centralized system for facilitating eligibility verifications of Lifeline applicants and subscribers.⁴ Since its full nationwide deployment in 2020, the National Verifier has served as the primary mechanism for determining consumer eligibility, most often through automated connections with state and federal agency

⁴ *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 4006, 4011, paras. 126, 133-135 (2016) (2016 Lifeline Report and Order).

databases.⁵ The NPRM now proposes a range of new verification measures, including secondary consent verification, enhanced identity checks, and potential collection of full Social Security Numbers.⁶ NTCA and NRECA support the Commission’s goal of ensuring that Lifeline benefits are directed only to eligible recipients. However, the Associations urge the Commission to assign responsibility for these new verification functions to USAC and the National Verifier, rather than to individual carriers. These proposals are precisely the type of program integrity work that the National Verifier was designed to perform.⁷

The NPRM seeks comment on whether households should be required to independently verify their enrollment and transfer requests through an affirmative response to a text or email, and whether USAC or the eligible telecommunications carrier (“ETC”) should be responsible for contacting the consumer.⁸ This function is more properly assigned to USAC than to individual ETCs. Having USAC contact the consumer directly to confirm consent before an enrollment or transfer is effectuated in the NLAD would produce more reliable and uniform results than leaving it in the hands of each individual ETC to implement its own secondary verification process. A centralized approach avoids the creation of duplicative systems across hundreds of providers, ensures that consumers receive a consistent verification experience regardless of which carrier they select, and enables USAC to maintain a single authoritative record of consent

⁵ USAC, *Launches*, <https://www.usac.org/lifeline/national-verifier/how-to-use-nv/launches/national-verifier-opt-out-launch/> (detailing the National Verifier launch schedule that was completed in Dec. 2020).

⁶ NPRM at paras. 25-30, 33-35.

⁷ 47 CFR § 54.400(o) (defining the National Verifier as “an electronic and manual system with associated functions, processes, and policies and procedures, to facilitate the determination of consumer eligibility for the Lifeline program, as directed by the Commission”).

⁸ *Id.* at para. 35.

confirmations. Moreover, requiring verification through text message or email may exclude elderly consumers and others who do not have access to a cellphone or broadband service, the very populations the Lifeline program is designed to serve. Having USAC perform this function would also mitigate concerns about introducing a new compliance gap – or even the potential for fraud – to the extent that certain ETCs fail to implement this properly. By contrast, requiring individual ETCs to perform secondary verification would impose costs that are disproportionate for small, rural providers without producing a meaningfully better result than centralized administration.

The NPRM also seeks comment on whether to require collection of the full nine-digit Social Security Number rather than the last four digits currently required.⁹ NTCA and NRECA support the use of additional verification tools where they are cost-effective and improve program integrity, but these functions must be housed within the National Verifier. Carriers should not be required to collect, transmit, or store full Social Security Numbers or other additional sensitive personally identifiable information. The security infrastructure necessary to protect such data would impose significant costs on small providers that are disproportionate to the number of Lifeline subscribers they serve.¹⁰ The National Verifier is the logical home for these verification functions, as again, it was created for this very purpose. This approach concentrates sensitive data handling in a single system with established security protocols rather than distributing that risk across many individual carriers.

⁹ *Id.* at para. 26.

¹⁰ *See* 47 CFR § 64.2011 (requiring telecommunications carriers to notify the Commission and affected individuals following a breach of customer proprietary network information). Requiring small carriers to collect and store full SSNs would significantly expand the scope of sensitive data subject to these breach notification obligations and the associated liability exposure.

III. BILL PAYMENT DEMONSTRATES SUBSCRIBER ENGAGEMENT AND SHOULD SATISFY USAGE REQUIREMENTS

NTCA and NRECA support the principle that Lifeline supported service should be actively used by subscribers and that USF dollars should not subsidize service that goes unused. The Associations agree with the Commission that the billing arrangements identified in the NPRM represent attempts to manufacture the appearance of a billing relationship without genuine monthly subscriber engagements.¹¹ However, the Commission should not extend usage tracking and non-usage de-enrollment requirements to *all* Lifeline plans, including those where the ETC assesses and collects a monthly fee from the subscriber. Where a subscriber is paying real money out of pocket every month, that payment is itself the most reliable evidence of active engagement with the service.

The Commission recognized this principle in the 2012 Lifeline Report and Order when it concluded that plans subject to monthly assessment and collection “do not present the same risk of inactivity as subscribers of pre-paid services” because subscribers have a financial incentive not to continue paying for a service they do not use.¹² That logic remains valid, and the record does not demonstrate that subscribers who pay monthly bills are a source of the program integrity concerns driving this proceeding.

The economics of the Lifeline program reinforce this point. Lifeline support never covers the full cost of broadband service – and it does not even come close in rural areas especially. Based upon the most recent Urban Rate Survey, the Commission has set the 2026 reasonable

¹¹ NPRM at paras. 89, 92; *see also Wireline Competition Bureau Reminds Eligible Telecommunications Carriers of Lifeline Requirements*, WC Docket Nos. 09-197, 11-42, Public Notice, 39 FCC Rcd 5689, 5690-91 (WCB 2024).

¹² *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6771, para. 263 (2012) (2012 Lifeline Report and Order).

comparability benchmark for fixed broadband service at 25/3 Mbps at \$106.66 per month,¹³ which represents rates two standard deviations above the urban average. Even using a conservative estimate of what rural subscribers actually pay, the out-of-pocket costs are substantial. A non-Tribal Lifeline subscriber receiving the standard \$9.25 monthly benefit is paying the vast majority of the bill out of pocket. Under even the most generous scenario, a subscriber on qualifying Tribal lands receiving the maximum enhanced Lifeline credit of \$34.25 per month (\$9.25 plus the \$25 Tribal benefit) is still responsible for a significant monthly payment.¹⁴

In short, no rational consumer would continue paying \$70 to \$90 or more each month for a service he or she is not using. The monthly financial obligation to the carrier is a built-in program integrity mechanism that ensures that subscribers who do not value or use the service will cancel. Given these economic incentives (and disincentives), there is no need for the Commission to impose additional tracking and reporting burdens on carriers under these circumstances.

IV. ADDITIONAL REFORMS SHOULD PRESERVE CONSUMER ACCESS AND REDUCE PROVIDER BURDENS

NTCA and NRECA support maintaining Lifeline support for voice-only service at the current \$5.25 level.¹⁵ For some NTCA and NRECA members, voice service remains the only

¹³ *Wireline Competition Bureau and Office of Economics and Analytics Announce Results of 2026 Urban Rate Survey for Fixed Voice and Broadband Services, Posting of Survey Data and Explanatory Notes, and Required Minimum Usage Allowance for Eligible Telecommunications Carriers*, WC Docket No. 10-90, Public Notice, DA 25-1088 (WCB/OEA Dec. 19, 2025). The reasonable comparability benchmark represents rates two standard deviations above the urban average monthly rate. See USF/ICC Transformation Order, 26 FCC Rcd at 17694, para 84.

¹⁴ 47 CFR § 54.403(a)(3).

¹⁵ 47 CFR § 54.403(a)(2); NPRM at paras. 57-59.

Lifeline supported service available in their service territories, and certain subscribers rely exclusively on voice for emergency access and basic communication. The Wireline Competition Bureau has recognized this reality by issuing one-year waivers of the voice-only phase-out every year since 2021.¹⁶ The pattern of repeated waivers demonstrates that the Commission should codify continued voice-only support rather than perpetuating regulatory uncertainty through annual extensions. Eliminating voice-only support would leave some of the nation's most vulnerable rural consumers with no Lifeline option at all in areas where no provider offers broadband service meeting the program's minimum service standards.

NTCA and NRECA welcome the Commission's inquiry into reducing regulatory reporting burdens on ETCs participating in Lifeline, particularly small businesses.¹⁷ The Associations support combining FCC Forms 481 and 555 into a single filing, aligning filing deadlines, and creating a single coordinated portal through which the Commission, USAC, and relevant state entities can access the information, and eliminating reporting requirements that duplicate information already collected through other Commission systems.¹⁸ Streamlining these requirements would reduce administrative costs for small providers without diminishing the Commission's ability to oversee the program.

¹⁶ 2021 Standards Waiver Order, 36 FCC Rcd at 15544-46, paras. 13-17; 2022 Standards Waiver Order, 37 FCC Rcd at 7697-98, paras. 14-17; 2023 Standards Waiver Order, 38 FCC Rcd at 6100-01, paras. 12-13; 2024 Standards Waiver Order, 39 FCC Rcd at 7004-05, paras. 12-13; 2025 Standards Waiver Order, 40 FCC Rcd at 4328, paras. 11-12.

¹⁷ NPRM at para. 71.

¹⁸ *Id.* at paras. 72-74.

V. CONCLUSION

For the reasons set forth above, NTCA and NRECA urge the Commission to assign new verification responsibilities to USAC and the National Verifier, recognize monthly bill payment as sufficient evidence of subscriber engagement, maintain voice-only support at \$5.25, and streamline annual reporting requirements. The Associations' members are committed to a Lifeline program that serves eligible rural consumers with integrity and efficiency.

Respectfully submitted,



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