

**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

**REPLY COMMENTS OF  
NTCA–THE RURAL BROADBAND ASSOCIATION  
AND  
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

**I. INTRODUCTION & SUMMARY**

NTCA–The Rural Broadband Association (“NTCA”)<sup>1</sup> and the National Rural Electric Cooperative Association (“NRECA”)<sup>2</sup> (collectively “the Associations”) hereby submit these reply comments in response to the Notice of Proposed Rulemaking (“NPRM”) released by the

---

<sup>1</sup> 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.

<sup>2</sup> 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.

Federal Communications Commission (“Commission”) in the above-captioned proceeding.<sup>3</sup> As the Associations stated in initial comments,<sup>4</sup> the Commission should assign responsibility for any new verification functions proposed in this proceeding to the Universal Service Administrative Company (“USAC”) and the National Verifier. The Associations also urged the Commission to view a subscriber payment of any amount toward a monthly bill as subscriber engagement, thereby satisfying the usage requirements. The record in this proceeding supports the positions set forth in the Associations’ initial comments and demonstrates broad consensus among stakeholders on the issues addressed herein.

## **II. THE RECORD SUPPORTS PLACING ANY NEW VERIFICATION RESPONSIBILITIES WITHIN THE PURVIEW OF USAC AND THE NATIONAL VERIFIER, NOT INDIVIDUAL CARRIERS**

In initial comments, the Associations urged the Commission to assign responsibility for any new verification functions proposed in this proceeding, including secondary consent verification, enhanced identity checks, and the potential collection of full Social Security Numbers (“SSNs”), to the USAC and the National Verifier, rather than to individual carriers. The record overwhelmingly supports this position. A diverse spectrum of commenters agree that the Commission should build upon the robust centralized verification and accountability infrastructure it has already invested in rather than layer new compliance obligations onto individual providers.<sup>5</sup>

---

<sup>3</sup> *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).

<sup>4</sup> Comments of NTCA-The Rural Broadband Association and the National Rural Electric Cooperative Association, WC Docket Nos. 11-42 et al. (filed May 4, 2026) (“NTCA/NRECA Comments”).

<sup>5</sup> See Comments of CTIA, WC Docket Nos. 11-42 et al., at 4–7 (filed May 4, 2026) (“CTIA Comments”); Comments of USTelecom – The Broadband Association, WC Docket Nos. 11-42 et al., at 4–6 (filed May 4, 2026) (“USTelecom Comments”); Comments of EchoStar Corporation, WC Docket Nos. 11-42 et al., at 4–5 (filed May 4,

As the Commission recognized in creating the National Verifier in 2016, centralizing eligibility determinations closes one of the main avenues of fraud and abuse in the Lifeline program.<sup>6</sup> The Commission further articulated that the goals of the National Verifier included easing burdens on Lifeline providers while improving privacy and security for consumers.<sup>7</sup> As others explain, eligibility verification requires carriers to take on functions fundamentally different from their role as telecommunications provider and this function is more properly handled by centralized administrators designed for this very purpose.<sup>8</sup> The record supports leveraging and strengthening these centralized systems rather than distributing these responsibilities across individual providers.<sup>9</sup>

The record is equally clear that carriers should not be required to collect, transmit, or store full nine-digit SSNs. As outlined in initial comments, the security infrastructure necessary to protect such data would impose significant costs on small providers that are disproportionate

---

2026) (“EchoStar Comments”); Comments of the Oklahoma Rural Telecommunications Coalition, WC Docket Nos. 11-42 et al., at 12 (filed May 4, 2026) (“ORTC Comments”).

<sup>6</sup> See *Lifeline and Link Up Reform Modernization*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 4007-08, ¶ 129 (2016) (“2016 Lifeline Order”) (creating National Verifier to “close one of the main avenues historically leading to fraud and abuse in the Lifeline program: Lifeline providers determining subscriber eligibility”).

<sup>7</sup> See *Bridging the Digital Divide for Low-Income Consumers*, Fourth Report and Order, Order on Reconsideration, and Memorandum Opinion and Order, 32 FCC Rcd 10475, ¶ 46 (2017) (stating the “goals of the National Verifier [are] to ease burdens on Lifeline providers while improving privacy and security for consumers applying to participate in the program”).

<sup>8</sup> See CTIA Comments at 5 (noting that verifying customer eligibility requires an ETC to “take on responsibilities that are fundamentally different from their core functions as telecommunications carriers” and to “consider eligibility information that is more commonly handled by social welfare agencies, . . . not telecommunications carriers”).

<sup>9</sup> See USTelecom Comments at 4 (noting that these systems “are specifically designed to perform eligibility and identity verification functions in a consistent, secure, and efficient manner” and that “[e]xpanding or enhancing these systems, where appropriate, is a more effective and less burdensome approach to ensuring program integrity than mandating that individual providers replicate similar functions independently”); EchoStar Comments at 4 (recommending that “the best way to enhance identity verifications is to confirm that the National Verifier and NLAD remain the sole and determinative verifiers of Lifeline eligibility”).

to the number of Lifeline subscribers they serve.<sup>10</sup> The record confirms that SSN collection is not a routine part of carrier operations<sup>11</sup> and imposing such a requirement would force providers to build new data handling and storage capabilities that run counter to established principles favoring minimization of sensitive data holding.<sup>12</sup> If the Commission determines that full SSN collection is necessary to verify applicant identity, that function should be housed exclusively within USAC and the National Verifier, allowing any unresolved identify issues to be worked out directly between USAC and the applicant.<sup>13</sup>

### **III. THE RECORD SUPPORTS ALLOWING SUBSCRIBER BILL PAYMENTS TO SATISFY USAGE REQUIREMENTS**

Commenters similarly agree that the Commission should not extend usage tracking and non-usage de-enrollment requirements to Lifeline plans where the ETC assesses and collects a monthly fee (of any amount) from the subscriber.<sup>14</sup> The Commission has long treated a

---

<sup>10</sup> NTCA/NREC Comments at 4-5.

<sup>11</sup> See CTIA Comments at 6 (noting that CTIA’s members “do not routinely collect or retain full nine-digit SSNs from Lifeline customers, or non-Lifeline prepaid wireless customers, today”); USTelecom Comments at 4–5 (stating that requiring providers to handle full SSNs “would create significant privacy and cybersecurity risks” and would be “inconsistent with widely recognized industry and regulatory best practices, which emphasize minimizing the collection and retention of sensitive data to reduce the risk of unauthorized access or misuse”); EchoStar Comments at 2 (cautioning that collecting full SSNs “raises significant privacy and security concerns, including the heightened risk of identity theft” and could “create a serious barrier to Lifeline program participation”).

<sup>12</sup> See USTelecom Comments at 5 (noting NIST and FTC guidance recommending companies scale back collection of personally identifiable information).

<sup>13</sup> See CTIA Comments at 6 (stating that if such a requirement is adopted, “the National Verifier should retain the responsibility for collecting and (if necessary) retaining full SSNs” and that “Lifeline providers would not ‘need to collect and store SSNs,’ and should not be required to do so”); USTelecom Comments at 5 (agreeing that “collection and storage of that information should be done exclusively by USAC through the National Verifier”); ORTC Comments at 12 (recommending that “USAC and the applicant can directly resolve the issue and securely share the full Social Security Number without incurring the risk of ETCs having to take and maintain that information”).

<sup>14</sup> See CTIA Comments at 11 (citing *Lifeline and Link Up Reform*, Order, 30 FCC Rcd 2801, 2802 ¶ 4 (WCB 2015) (concluding that “actually collecting some monthly [copay] amount from subscribers is sufficient to ascertain subscriber intent and ensures that subscribers will continue to subscribe to the service only to the extent that they value and use the service”)); USTelecom Comments at 3–4 (observing that “where consumers pay a portion of their service costs, they already have a strong incentive to use the service” and that “the act of paying for service is itself a reliable indicator of usage and intent”); EchoStar Comments at 10 (stating that “[a] subscriber’s financial

subscriber's decision to pay a monthly bill as meaningful evidence that the subscriber values and intends to continue using the service, and the record confirms broad agreement that this logic remains sound. As discussed in initial comments, the economics of the Lifeline program make these burdens unnecessary as Lifeline rarely covers the full cost of broadband service, especially in rural America where subscribers pay the vast majority of the bill out of pocket.<sup>15</sup> The Commission should maintain its existing approach under which monthly assessment and collection satisfies the usage requirement.

#### IV. CONCLUSION

For the reasons set forth above and in initial comments, NTCA and NRECA urge the Commission to assign any new verification responsibilities to USAC and the National Verifier rather than individual carriers, and to maintain monthly bill payment as sufficient evidence of subscriber engagement. The broad consensus reflected in the record supports these positions and should guide the Commission's actions in this proceeding.

Respectfully submitted,



By: /s/ Brian Ford  
Vice President, Federal Regulatory  
[bford@ntca.org](mailto:bford@ntca.org)

/s/ Lorna Gilmore

commitment through monthly payments provides unequivocal evidence of their affirmative intent to maintain and utilize the service”).

<sup>15</sup> NTCA/NRECA Comments at 6 (citing the 2026 reasonable comparability benchmark for fixed broadband service at 25/3 Mbps of \$106.66 per month).



By: /s/ Erin Fitzgerald Dobozy  
Regulatory Affairs Director  
[erin.dobozy@nreca.coop](mailto:erin.dobozy@nreca.coop)

4301 Wilson Boulevard

Policy Manager  
[lgilmore@ntca.org](mailto:lgilmore@ntca.org)

Arlington, VA 22203

4121 Wilson Boulevard  
Arlington, VA 22203

June 2, 2026