ADTRAN, Inc. (“ADTRAN”) takes this opportunity to respond to a few of the issues raised in the initial comments on the Commission’s Notice of Proposed Rulemaking concerning reforms to the Lifeline and Link Up subsidy programs. ADTRAN filed initial comments in support of the Commission’s efforts to update and expand the subsidized services to include broadband, while also taking steps to make the program more efficient and less susceptible to waste, fraud and abuse. ADTRAN recognizes that broadband has become essential for participating in many activities, including education, health care and civic involvement. The proposed reforms to the Lifeline and Link Up programs can help ensure that this critical service is affordable to low-income Americans. But ADTRAN wants the Commission to make sure that

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the reforms are efficient and technology neutral. Some of the other initial comments were not consistent with these principles.

One of the issues raised in the NPRM was the need to establish technical standards for the broadband services to be subsidized under the Lifeline program. Some of the comments suggest that the Commission should adopt separate, less robust standards that would apply to mobile broadband services. CTIA contends that the Commission has elsewhere established mobile-specific standards to account for the particular attributes of wireless broadband networks. And the Joint Wireless Carriers urge the Commission to adopt “technology neutral” standards -- if the Commission establishes minimum standards -- but their conception of “technology neutral” would be less rigorous standards for mobile broadband (e.g., 3G service). ADTRAN disagrees with these proposals by wireless interests to apply lower standards to mobile broadband.

In its comments, USTelecom questions the necessity of prescribing minimum standards, because different individuals or households may have varying needs, and different offerings may best fit their needs. USTelecom goes on to suggest that if the Commission nonetheless adopts minimum standards, it should do so without regard to particular technologies:

2 CTIA Comments at p. 10.

3 Joint Wireless Carriers Comments (Blue Jay Wireless, LLC, et al.) at p. 23. Cf., Qualcomm Comments at p. 7 ("FCC adoption of Lifeline performance standards that do not account for the capabilities of today’s mobile broadband networks will impede the ability of low-income consumers to access the mobile services they demonstrably prefer").

4 See, USTelecom Comments at p. 10:

Given that the universe of potential Lifeline subscribers encompasses a broad range of demographics, consumers should be free to select the Lifeline broadband service that best meets their needs. For example, a senior citizen living on his or her own may have different broadband needs from a family with school aged children. While the former may have basic broadband needs relating to general communication (e.g., e-mails, web-
To the extent the Commission deems it necessary to establish minimum service standards, it should do so in a technology neutral manner, with identical minimal speeds for wireline and wireless services. Such an approach will ensure competitive parity and is consistent with the Commission’s determination that consumers should have access to broadband that is capable of enabling key applications.\(^5\)

ADTRAN agrees with USTelecom that the Commission should not tilt the playing field to favor any particular technology by adopting different standards for specific technologies. But ADTRAN also agrees that the Commission need not adopt minimum standards, but instead should leave it up to the consumers to choose the services that best suits their needs.\(^6\) A number of the other commenting parties concur with the view that consumers should have the flexibility to select a broadband service, rather than have the Commission dictate minimum speeds.\(^7\)

\(^{5}\) USTelecom Comments at p. 11.

\(^{6}\) In its initial comments, ADTRAN suggested that a minimum standard of 10/1Mbps as utilized in the CAF Phase II program might be appropriate, if not too “generous.” But having reviewed the comments that were filed, ADTRAN now believes that it would be unnecessary for the Commission to prescribe minimum speeds, instead allowing customers to choose the services that best meet their needs at prices they are willing to pay.

\(^{7}\) E.g., Cincinnati Bell Comments at pp. 4-7 (don’t require minimum speed); ITTA Comments at pp. 26-28 (FCC should not establish minimum standards – prescribing such standards increases costs and takes choice away from consumers); Comcast Comments at p. 13 (“the Commission should not adopt Lifeline minimum service standards that place undue restrictions on Lifeline customers’ ability to apply their Lifeline subsidy to the broadband plan that best meets their needs.”); NCTA Comments at pp. 2-3 (do not establish minimum standards, but allow customers to choose what best suits their needs); ACA Comments at p. 8 (“The Commission should not link access to the subsidy to a minimum level of broadband service for wireline providers; there is no evidence that today’s standard wireline broadband service offerings (as well standard voice offerings) are inadequate or not reasonably priced, even for introductory levels of service. Moreover, by imposing additional service requirements on providers, the Commission would discourage their participation, which would in turn limit the number and variety of broadband services available to low-income consumers.”); Comptel Comments at pp. 11-12 (do not set minimum standards for fixed and mobile broadband, instead “the Commission should permit the market and consumers to choose the mix and grade of services that best suit their needs.”); Telscape et al. Comments at pp. 5-7 (no need to prescribe...
On a separate issue, in its initial comments, AT&T contends that the Commission cannot and should not designate broadband as a “supported service” under Section 54.101 of the Commission’s Rules, which would have the effect of “mandating that ETCs provide broadband Internet access service throughout their ETC service areas.” ADTRAN agrees. Without subsidization, the Commission cannot simply dictate that a particular class of broadband service providers – ETCs – deploy broadband service even in areas where it would be uneconomical. ADTRAN in its initial comments did indicate that broadband should be a “supported service,” but wants to clarify that it meant “supported service” as a generic equivalent to “subsidized service.” ADTRAN did not intend to suggest that the Commission should designate broadband as a “supported service” under Section 54.101 of the Commission’s Rules that would then have to be provided throughout an ETC’s territory.

Finally, ADTRAN want to address two proposals in the initial comments that it believes would be unwise and impractical. Qualcomm suggests that the Commission could use the Lifeline program to end the “homework gap”:

Mobile broadband can play an important role in closing the “homework gap,” as demonstrated by the E-rate Mobile Broadband LOGO Pilot program and by the popularity of mobile services, devices, and applications among the many millions of today’s successful students. While ADTRAN appreciates the critical role broadband plays in today’s educational system, the Lifeline program may not be the best way to address comprehensively the “homework gap”

minimum service standards – customers should choose the services and level of service they desire); ITIF Comments at p. 7 (“the Commission should determine the appropriate level of eligibility and work to get all those who qualify connected, leaving the choice of speeds and mode (wireline or wireless) up to the participants.”).

8 AT&T Comments at p. 30.

9 Qualcomm Comments at p. 3 (footnote omitted).
issue. Doing some “back of the envelope” calculations, there are an estimated 5 Million households with school age children that lack access to broadband.\textsuperscript{10} The reported annual per student cost estimates for the Learning On-The-Go (“LOGO”) wireless pilot program referenced by Qualcomm ranged from $352 (San Diego Unified School District) to $712 (Piedmont City School District). Assuming an annual average cost of $500 per student, and 5 Million households (with an average of 1.8 students per household\textsuperscript{11}), the annual cost of completely closing the “homework gap” using mobile broadband would be $4.5 Billion. Such an expenditure would put a huge strain on the Universal Service Fund, and under the current contribution system would increase the USF contribution factor to well over 20%. This suggests that the issue of fully eliminating the “homework gap” is best addressed legislatively, rather than by the Commission in its reform of the Lifeline Program.\textsuperscript{12}

The Joint Wireless Carriers advocate creation of a “comprehensive ‘National Lifeline Wi-Fi Network,’ a nationwide, free-to-end-user Wi-Fi network for participants in the Lifeline program similar to the cable industry’s Wi-Fi Alliance.”\textsuperscript{13} ADTRAN believes that such a network raises significant problems with regard to cost, management, spectrum availability (particularly if there would be separate spectrum dedicated to such a network) and limiting

\textsuperscript{10} See, Separate Statement of Commissioner Rosenworcel in the \textit{NPRM} ("According to the Pew Research Center, the Homework Gap is real because five million households out of the 29 million households in this country with school-aged children lack access to broadband.").

\textsuperscript{11} See, \url{https://www.census.gov/hhes/families/files/graphics/FM-3.pdf}.

\textsuperscript{12} The Digital Learning Equity Act could be one such legislative fix. Cf., \url{https://www.fcc.gov/document/commissioner-rosenworcel-statement-digital-learning-equity-act}.

\textsuperscript{13} Joint Wireless Carriers Comments (Blue Jay Wireless, LLC, et al.) at p. 59.
access to eligible individuals. The Commission has rejected similar proposals in the past,\(^\text{14}\) and should reject this proposal as well.

ADTRAN strongly supports the Commission’s proposal to reform the Lifeline Program so that broadband services will be subsidized. Broadband services can allow the currently unconnected households to engage in remote health care monitoring, Internet surfing/research, video calling, job seeking (and job training), and helping to close “homework gap.” ADTRAN thus urges the Commission to support broadband services under the Lifeline Program, but on a technology-neutral basis. In addition, the Commission should reject proposals that would greatly expand or complicate the Lifeline Program.

Respectfully submitted,
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