



Jan. 8, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St, SW
Washington, D.C. 20554

**Re: Notice of *Ex Parte* presentation
WC Docket No. 11-42, 09-197 and 10-90**

Dear Ms. Dortch:

On Wednesday, Jan. 6, 2015, Tom Koutsky of Connected Nation, Rachel Bird Niebling and Chip Slaven of the Alliance for Excellent Education, Randy Paris of Digital Promise, Reg Leichty from EducationCounsel (on behalf of COSN) and the undersigned met with Charles Eberle, Trent Harkrader and Gigi Sohn of the FCC staff to discuss the Lifeline reform proceeding. Each of the organizations represented in the meeting expressed support for modernizing the Lifeline program to include support for broadband services for low-income people. We also indicated that schools and libraries could help to distribute information about the availability of the Lifeline support in their communities.

In addition, we discussed a few key legal questions in the upcoming decision:

- We supported the view that schools, libraries and other anchor institutions should be able to participate in the Lifeline program to the extent that they are providers of broadband services to low-income consumers. We expressed the view that the Commission should not require Lifeline providers to be an Eligible Telecommunications Carrier (ETC) in order to participate in the Lifeline program. We stated that section 254(e) was only intended to apply to the former high-cost fund, and that section 254(j) recognizes the Commission's legal authority to allow non-ETCs to participate in the Lifeline program. To protect against waste, fraud and abuse in the Lifeline program, we suggested that the Commission adopt a streamlined certification process for schools, libraries and other community anchor institutions such as housing projects, that wish to participate, rather than subjecting them to the ETC process and requirements.
- We also discussed the proposal to allow schools, libraries and other community anchor institutions such as public housing projects to apply for Lifeline support as agents on behalf of Lifeline consumers. We noted that there would be administrative

efficiencies if an institution were able to submit one application on behalf of hundreds of low-income residential consumers that it serves, rather than each low-income consumer submitting a separate application. There is precedent for aggregating universal service discounts, as the E-rate rules allow Research and Education networks to apply for E-rate funds on behalf of schools and libraries. Aggregation of Lifeline benefits in a similar way would provide administrative benefits and would allow community anchor institutions to offer a wide range of services to low-income consumers, including off-campus connectivity for students and digital literacy training.

- We also noted that the benchmarks for reviewing the success of the Lifeline program should be based on broadband adoption and affordability, not “availability” as proposed in the NPRM.

Finally, we noted that anchor institutions have a strong interest serving the needs of their surrounding communities, not just the broadband needs within the school or library buildings. We urged the FCC to adopt Lifeline rules that give anchor institutions an opportunity to help make the Lifeline program successful in promoting broadband adoption and addressing the “homework gap.”

Sincerely,

A handwritten signature in black ink that reads "John Windhausen, Jr." with a stylized flourish at the end.

John Windhausen, Jr.

Executive Director

SHLB Coalition

(202) 256-9616

jwindhausen@shlb.org

cc: Charles Eberle
Trent Harkader
Gigi Sohn