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November 4, 2021

The Honorable Jessica Rosenworcel  
Chairwoman  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: WC Docket No. 11-42, Lifeline and Linkup Reform and Modernization**

Dear Chairwoman Rosenworcel:

I write to urge the Federal Communications Commission to reconsider the intended phase-down of Lifeline support for standalone voice service as adopted in the 2016 Lifeline Order.<sup>1</sup> My home state of Vermont is one of many where low-income residents rely solely on voice service with no ability – whether due to lack of availability or excessive cost -- to transition to broadband to access voice offerings supported by Lifeline. I ask that you and your fellow Commissioners grant the National Association of State Utility Consumer Advocates’ (“NASUCA”) petition for reconsideration<sup>2</sup> so that those vulnerable consumers are not disconnected and left behind beginning next month.

The record reflects broad support for the NASUCA petition and for the Commission to give consumers, states and providers more time to sufficiently prepare in advance of the phase-down taking effect.<sup>3</sup> Because the phase-down date is mere weeks away, it is imperative that the Commission act quickly to ensure that low-income consumers do not lose their primary means of telephone service, especially in light of the fact that we remain in a pandemic that has laid bare the continued need for connectivity.

Should the Commission proceed with the December 1, 2021 phase-down in December, it will adversely affect approximately 3,000-3,600 Vermonters who are low-income and depend on voice-only services for their fundamental connectivity needs. With the COVID-19 pandemic still unabated, the imminent phase-down of Lifeline support for standalone voice service will put lives in danger and exacerbate the financial struggle low-income Vermonters already experience. This fallout will cut directly against the Commission’s stated goal of keeping Americans connected for the duration of the pandemic.

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<sup>1</sup> Lifeline and Link Up Reform and Modernization et al., *Third Report and Order, Further Report and Order, and Order on Reconsideration*, 31 FCC Rcd 3962, 3987, ¶ 66 (2016).

<sup>2</sup> Petition of NASUCA for Reconsideration, WC Docket No. 11-42 (June 23, 2016).

<sup>3</sup> See, e.g. Comments of California Public Utilities Commission, WC Docket No. 11-42 (Aug. 3, 2021); Reply Comments of National Association of Regulatory Utility Commissioners, WC Docket No. 11-42 (Aug. 17, 2021); Reply Comments of USTelecom – The Broadband Association, WC Docket No. 11-42 (Aug. 17, 2021).


My agency is well aware that some eligible Lifeline consumers can continue to receive discounted voice-only Lifeline services in certain census blocks pursuant to the Wireline Competition Bureau's June 1, 2021 *Public Notice*.<sup>4</sup> However, according to my staff's calculations, approximately 12,571 census blocks remain subject to the December 1, 2021 phase -down, many of which likely contain affected low-income customers.

Finally, I must underscore the inaccuracy of the data the Commission has used for phasing down the voice-only Lifeline option. In Vermont, there are 24,611 unique census blocks, but according to the data listed on the Universal Service Administrative Company website, there are only 19,033 unique records listed. This discrepancy leaves approximately 6,993 census blocks unaccounted for even in areas where there is no competitive alternative. Should the December 1, 2021 phase-down become effective, voice-only Lifeline customers in those census blocks could be left with no voice service at all.

I thank you for your time and consideration of this important matter, and I welcome further discussion with the Commission on ways to continue to keep Americans connected.

Kind regards,

DocuSigned by:



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June E. Tierney

Commissioner

Cc: Commissioner Brendan Carr  
Commissioner Geoffrey Starks  
Commissioner Nathan Simington

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<sup>4</sup> Wireline Competition Bureau Announces Census Blocks in which Eligible Lifeline Consumers can Continue to Receive Discounted Voice-Only Lifeline Service, *Public Notice*, WC Docket Nos. 11-42, 09-197, 10-90 (June 1, 2021).