



April 6, 2021

Acting Chair Jessica Rosenworcel
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: File No. ITC-T/C-20200930-00173
GN Docket No. 21-112

Dear Acting Chair Rosenworcel:

On behalf of The Leadership Conference on Civil and Human Rights (The Leadership Conference), a coalition charged by its diverse membership of more than 220 national organizations to promote and protect the rights of all persons in the United States, we submit this comment in connection with Verizon Wireless Communication Inc.'s application to acquire TracFone Wireless, Inc. to highlight the need for both the Commission and Verizon to take significant steps to protect TracFone's Lifeline subscribers.

We consider a robust Lifeline program to be a top priority for the civil and human rights coalition. The current record is devoid of any detailed plans for a long-term, robust investment in quality Lifeline services post-transaction. Accordingly, we urge the Commission not to approve this transaction absent binding conditions that will protect Lifeline customers. As a next step, we urge the Commission to issue a Request for Information to obtain information sufficient to make the necessary public interest determinations and provide answers to the questions that have been raised in the record about potential harms to Lifeline subscribers.

As the Commission has consistently found, both voice and broadband services are essential for full participation in today's society. This is especially true now, as the nation continues to struggle with the challenges posed by the current public health and economic crises. The need for connectivity across the country for access to news and information, education, employment, and health care has never been greater, exacerbating the consequences of the existing digital divide, even as fewer people are able to afford broadband during the crisis. The Lifeline program was created to help close the affordability gap that keeps seniors, veterans, people of color, people with disabilities, and residents of rural areas unconnected to 21st century communications services. Millions of Americans today rely on the Lifeline program for access to affordable voice and broadband services.

In its initial application and subsequent filings, Verizon asserts that it will continue offering Lifeline supported services through TracFone where it offers service over Verizon's

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Wade Henderson


network.¹ Outside of these vague assertions, Verizon has failed to provide any detailed information for how it plans to meaningfully participate in the Lifeline program post-transaction. For example, Verizon has not provided an explanation of the type of wireless coverage it will provide TracFone's Lifeline customers and what the timeline would be for migrating subscribers who are currently receiving service on a non-Verizon network.

With approximately 1.7 million low-income subscribers across 43 states and the District of Columbia (comprising 22 percent of total Lifeline subscribers), Tracfone is one of the largest providers of Lifeline services.² We urge the Commission and Verizon to ensure that these Lifeline customers are protected post-transaction. If you have any questions about the issues raised in this letter, please feel free to contact Leadership Conference Media/Telecommunications Task Force Co-Chairs Cheryl Leanza, United Church of Christ, Office of Communication, Inc., at cleanza@alhmail.com, Kate Ruane, American Civil Liberties Union, at kruane@aclu.org, or Bertram Lee, at lee@civilrights.org.

Sincerely,



Wade Henderson
Interim President and CEO



LaShawn Warren
Executive Vice President for Government Affairs

¹ See Application; See Letter of America Movil, S.A.B. de C.V., TracFone Wireless, Inc., and Verizon Communications Inc., IB File No. ITC-T/C-20200930-00173 (Feb. 11, 2021).

² Lifeline Participation, Universal Service Administrative Co., <https://www.usac.org/lifeline/learn/programdata/>.