



July 31, 2015

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket Nos. 09-197, 10-90 and 11-42

Dear Ms. Dortch:

The Voice on the Net Coalition (“VON”) was founded in 1996 to support the continued development of Internet communications through regulatory advocacy and education.¹ During this time, VON members have developed the applications, products and services that have transformed the way all of us communicate - whether by voice, data, text or video. But one significant obstacle continues to impair all IP communications providers— the unavailability of ubiquitous broadband.

The Commission has the opportunity today to help fill existing voids for Internet access in two underserved communities: in rural America and among low income populations. With changes to existing Universal Service Fund (“USF”) programs for high cost areas and Lifeline, the Commission will substantially close the gap for broadband availability. VON supports both of these efforts.

Specifically, VON supports proposals to provide USF support for stand-alone broadband in rate of return areas. Under existing rules, high cost support in rate of return markets is limited to lines where the end user also subscribed to the incumbent local exchange carrier’s voice offering.² This policy is inconsistent with the Commission’s repurposing of USF to support broadband.

Providing such support would advance several of the goals articulated in the *Connect America Fund Order*. It would promote broadband adoption, consistent with Section 254(b)(3). It would also afford customers in high-cost areas with access to advanced voice and video applications and services comparable to those available in urban areas. Finally, it would encourage competition for

¹ VON consists of leading IP communications companies developing and delivering innovative services over the Internet. VON works to advance regulatory policies that enable Americans to take advantage of the full promise and potential of IP communications. The Coalition believes that with the right public policies, IP-based services can make communicating more affordable, businesses more productive, jobs more plentiful, the Internet more valuable, and Americans more safe and secure. For more information, visit www.von.org.

² Public Notice, *Wire/line Competition Bureau Seeks Comment on Options to Promote Rural Broadband in Rate-of-Return Areas*, WC Docket No. 10-90, DA 13-1112 at 1 (WCB May 16, 2013).



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voice services, giving consumers the opportunity to subscribe to a competitor's VoIP offering without having to pay for two voice applications.

VON also supports the inclusion of broadband as part of available Lifeline offerings.³ An individual's ability to participate in the 21st Century economy requires broadband for education, health and public safety. As more Lifeline eligible participants purchase smart phones, limiting the offering to voice and text puts those most in need without access to vital services. Many of these people do not have access to the Internet at home and rely on Lifeline-supported phones for access to online homework, job applications and medical information.⁴

As the Commission notes, "broadband provides the ability to facilitate societal interaction and communications through email, instant messaging, and real-time video conferencing...."⁵ These features and functionalities are critical for individuals that may be hearing or speech impaired. Ubiquitous access to broadband will also be required for the successful deployment and operation of Next Generation 911; and it will be critical for all consumers to have broadband enabled devices.⁶

The most fundamental premise of the Communications Act is that ALL Americans should have access to basic communications services, including broadband. By expanding the high cost and Lifeline programs as described above the Commission will be taking a big step toward the broadband ubiquity it desires.

Please contact the undersigned if you have any questions.

Respectfully submitted,

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³ Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, WC Docket 11-42, FCC 15-71 (rel. June 22, 2015) at para. 17.

⁴ Id. at paras. 18-20.

⁵ Id. at para. 28.

⁶ Id. at para. 29.