



March 10, 2020

Peggy Mitchell

Secretary

Oklahoma Corporation Commission

Jim Thorpe Office Building

2101 Lincoln Boulevard

Oklahoma City, OK 73105

IN RE: INQUIRY OF THE OKLAHOMA CORPORATION COMMISSION TO IDENTIFY AND RESOLVE ISSUES RELATED TO THE OKLAHOMA UNIVERSAL SERVICE FUND, LIFELINE SERVICE, OKLAHOMA HIGH COST FUND, BROADBAND SUPPORT, VOIP SERVICE AND OTHER TELECOMMUNICATIONS MATTERS (CAUSE NO. PUD 2018-00066)

Dear Secretary Mitchell:

On behalf of the National Consumers Leagueⁱ and Next Century Cities,ⁱⁱ I am writing in support of the Oklahoma Corporation Commission's (the "Commission") proposal to amend 17 O.S. § 139.105 to increase the current Oklahoma Lifeline Fund ("OLF") support to \$10.00 per month for eligible households living on non-tribal areas, and those households on tribal areas not eligible for enhanced federal Lifeline support.

The undersigned groups know the impact that access to modern communications technology makes in the lives of millions of Americans. The proposed enhanced Lifeline subsidy will help more low-income Oklahomans benefit from the Lifeline program and expand opportunities for Lifeline participants. As noted in the filing by Consumer Action, a similar system of support in California has proven beneficial for consumers: "each qualified California household receives more than \$14 per month in addition to their federal Lifeline

subsidy (\$9.25). The California model works well, with participation rates of more than 40 percent, and improves low-income households' voice and broadband connectivity.”

We know that low-income consumers deserve access and, for families living on the margins, Lifeline benefits can make a world of difference. The Census Bureau reports that only 59.3% of U.S. households with annual incomes less than \$20,000 have adopted broadband.ⁱⁱⁱ In Oklahoma City, only 50.1% of households in the same income bracket have adopted broadband.^{iv} A recent BroadbandNow Study found that 1.6 million Oklahomans are unserved by "terrestrial" broadband internet.^v Consequently, the proposed increase in OLF support will help address Oklahoma's lagging broadband adoption rates compared with the rest of the United States.

We agree with filings from Consumer Action, the National Grange, and other advocates that the additional \$10 to the OLF is a reasonable increase that would significantly improve broadband access for millions of Oklahoma residents. Ultimately, it will help bridge the digital divide and should be given high priority.

Sincerely,



John Breyault

Vice President, Public Policy, Telecommunications, and Fraud

National Consumers League

E-mail: johnb@nclnet.org

Phone: (202) 835-3323

ⁱ The National Consumers League, founded in 1899, is America's pioneering consumer organization. Our mission is to protect and promote social and economic justice for consumers and workers in the United States and abroad. For more information, visit www.nclnet.org.

ⁱⁱ Next Century Cities is a non-profit coalition of over 200 municipalities, founded to support mayors and local elected officials, that work to ensure that every resident has access to fast, affordable, and reliable broadband. Working together, member communities collaborate on ways to build next-generation networks, improve affordability, and increase adoption rates. Next Century Cities views the Lifeline program as an essential tool

used to expand broadband to unserved and underserved populations. For more information, visit www.nextcenturycities.org.

iii Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates. Online: <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

iv Macaig, Mike. "Digital Divide Most Glaring in Low-Income Communities," *Government Technology*. September 7, 2017. Online: <https://www.govtech.com/computing/Where-the-Digital-Divide-Is-the-Worst.html>

v [Busby, John and Tanberk, Julia](#). "FCC Reports Broadband Unavailable to 21.3 Million Americans, BroadbandNow Study Indicates 42 Million Do Not Have Access," BroadbandNow Research. February 2020. Online: <https://broadbandnow.com/research/fcc-underestimates-unserved-by-50-percent>