



July 15, 2020

Hon. Roger F. Wicker
 Chairman
 Committee Commerce, Science, and
 Transportation
 U.S. Senate
 Washington, DC 20510

Hon. Maria Cantwell
 Ranking Member
 Committee Commerce, Science, and
 Transportation
 U.S. Senate
 Washington, DC 20510

Hon. Frank J. Pallone, Jr.
 Chairman
 Committee on Energy and Commerce
 U.S. House of Representatives
 Washington, DC 20515

Hon. Gregory P. Walden
 Ranking Member
 Committee on Energy and Commerce
 U.S. House of Representatives
 Washington, DC 20515

Dear Chairman Wicker, Ranking Member Cantwell, Chairman Pallone, and Ranking Member Walden:

The Multicultural Media, Telecom and Internet Council (MMTC) and the undersigned 25 organizations write to express our support for congressional measures to provide relief for the millions of households that are struggling to get and stay connected during the COVID-19 pandemic. We applaud the forward-thinking efforts made in the recent Health and Economic Recovery Omnibus Emergency Solutions (HEROES) Act, particularly through the Emergency Benefit for Broadband Service, which has already passed the House. However, as the Senate considers the bill and both houses engage in negotiations, we believe several steps can be taken to strengthen the proposals made to support individuals and families, and to improve the likelihood that these critical measures pass the Senate.

Keeping families connected is more important now than ever. Broadband connectivity is the critical link for tens of millions of households to keep working, learning, and socially engaging while sheltering in place. And for the many more millions who cannot work remotely or who will pioneer the reopening of the American

economy, mobile broadband remains crucial for staying connected while traveling to and from their workplaces.

The Federal Communications Commission's (FCC) most recent Broadband Deployment Report found that more than 18 million Americans lacked access to broadband that met the FCC's minimum standards.¹ In normal times, this figure would be highly concerning. But in a pandemic, access to affordable broadband can literally become a life-and-death issue, as it provides access to vital information and is a cornerstone of connectivity for our personal and professional lives. Many families are struggling to get by, with about half of lower-income Americans reporting household or job wage loss due to COVID-19,² and defraying the cost of connectivity would make a meaningful impact in their lives.

We remain committed to our position that expanding access to and increasing awareness about the FCC's Lifeline program, which provides discounted mobile and internet service to low-income families that are trying to subsist on less than 135 percent of the Federal Poverty Guidelines, is of critical importance. The program is a vital resource to help those most in need get and stay online, and we applaud the measures proposed in the HEROES Act to strengthen the Lifeline program by enhancing its benefits.

However, there is also another constituency that is not eligible for Lifeline but impacted by the economic recession – millions who live just above Lifeline's current income thresholds and are struggling to make ends meet. We believe that extra and immediate measures must be taken to ensure that affordable access to high-quality internet service can be a reality for everyone in need now.

Congress can support these efforts by establishing a voucher program to help cover vital communications services for families who aren't eligible for the Lifeline program but are still in financial distress. While the HEROES Act takes a major step toward keeping people connected during the coronavirus emergency, the Act can go further in several critical respects:

Funding Appropriation

- *First*, the Act authorizes up to \$9 billion in consumer support for broadband connectivity, but appropriates less than half the authorized amount for actual spending. We suggest that for the emergency broadband benefit to help consumers in their time of need, Congress must fully appropriate the authorized funds.

Establishment of Voucher Program

- *Second*, the Emergency Benefit for Broadband Service in the HEROES Act would help low-income households and households with a member who has lost his or her job as a result of the pandemic – but, as noted above, the current crisis has imposed financial strains on many other households that do not fall into either of those categories, such as individuals who had their work hours reduced or who lost their jobs but found new employment with lower pay. We believe that the most efficient and effective way to ensure these households can maintain connectivity is through the establishment of a voucher program that would complement the Lifeline program by covering individuals who are struggling but cannot qualify for Lifeline because their income is falls outside its thresholds.

¹ *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, 2020 Broadband Deployment Report, Docket No. 19-285, __ FCC Rcd __, ¶ 94 (rel., April 24, 2020).

² See Kim Parker, Juliana Menasce Horowitz, and Anna Brown, *About Half of Lower-Income Americans Report Household Job or Wage Loss Due to COVID-19*, Pew Research Center (April 21, 2020), available at <https://www.pewsocialtrends.org/2020/04/21/about-half-of-lower-income-americans-report-household-job-or-wage-loss-due-to-covid-19/>

- The program would deliver two vouchers per month, and the disbursement mechanism would mirror that used in the CARES Act. By using the voucher mechanism and the CARES Act framework, program administrators would avoid having to create a new eligibility test and verification mechanism, which would slow the verification and fund disbursement process. We further recommend that the program incorporate an accompanying public awareness campaign to promote the voucher program and others such as the Lifeline program. This campaign could be modeled on that of the DTV Voucher Program previously launched in 2008, which had widespread success in ensuring the public knew about the support available to them. More details about the voucher proposal are provided below.

Expanding Eligibility to ITIN Users

- *Third*, the Act's proposed emergency broadband benefit program has laudably attempted to remedy the approach taken in the CARES Act, which excluded millions of immigrants who do not have legal status in the U.S. but work here and pay taxes; it excluded American citizens who are married and filed jointly with individuals who use Individual Taxpayer Identification Numbers (ITINs); and it excluded their children, who also may be citizens, and are suffering the economic effects of the COVID-19 pandemic. The HEROES Act's inclusion of ITIN users will ensure these families are not left out of the vital assistance they need. We have recommended that the mechanism used under the CARES Act be implemented to expedite fund disbursement for the voucher program; in doing so, it also should be updated to include eligibility for ITIN taxpayers and their families. Providing support to ITIN users will help these individuals and their families to afford the internet connectivity necessary to connect to social and economic opportunities while keeping their families safe.

Proposed Voucher Program Details

We support a program where qualified households' eligibility would be defined by Congress based upon a predetermined income level that would qualify them to receive two vouchers each month for the duration of the COVID-19 emergency. Based on federal income ranges, we suggest low-income and lower-middle class households that do not qualify for Lifeline be eligible for the voucher program – the thresholds would be \$20,000 to \$50,000 per year for single individuals and \$30,000 to \$60,000 per year for heads of household and those who are married filing jointly.

A two-voucher system would be beneficial because it would provide recipients the option of using their vouchers for two different communications services, combining them toward the payment of a single bill, or allowing multiple members of the same household to use the voucher. Further, the vouchers could be applied to existing communications services bills or at the point of sale when subscribing to new services.

A qualified household would have their vouchers administered through the same mechanism used in the CARES Act, but also would include ITIN taxpayers. The IRS and Department of the Treasury would serve as administrators and, in keeping with the CARES administrative structure, would automatically send the vouchers to qualified taxpayers under the emergency broadband relief program. Upon receipt of a voucher, the service provider would redeem it for reimbursement from a fund created by Congress for this purpose.

Because the program would rely on the same distribution methods being used to provide COVID-19 financial relief through the CARES Act, no new eligibility or verification process would be necessary. Use of pre-qualified vouchers also would prevent providers from seeking reimbursement from ineligible households, which would help prevent waste, fraud, and abuse.

Consumers should have the power to choose the communications solutions that work best for their families during this time of crisis, and the two-voucher system provides the flexibility they need to fit their needs. Further, expanding eligibility criteria to all those tax-paying individuals who operate under work

authorizations, work with ITINs, or are members of families with mixed citizenship status would further ensure the strongest recovery possible for our nation. Finally, avoiding the creation of artificial barriers to accessing the voucher, along with publicizing the program's existence, are two components critical for helping to ensure unemployed and underemployed consumers receive the support they need to stay connected – now. Requiring needy families to navigate a complex, decentralized state-by-state administrative structure, on the other hand, would cause undue delay for them to benefit from the voucher. Connectivity during this pandemic in a timely manner is essential.

Proposed Broadband Voucher Is Cost-Effective, Targeted, Efficient, and Inclusive

The coronavirus pandemic is a once-in-a-century event that requires swift and resolute action from policymakers. Keeping the vulnerable connected represents an important component for the health, safety, and economic well-being of everyone in our nation and shows what we truly value as a society. A federally administered broadband voucher, paired with the temporary Lifeline expansion currently being considered under the HEROES Act, would offer a cost-effective, targeted, and efficient way to make sure we all stay connected.

Respectfully submitted,

1. Multicultural Media, Telecom and Internet Council (MMTC)
2. A. Philip Randolph Institute
3. ALLvanza
4. Asian Americans Advancing Justice | AAJC
5. Black Female Founders
6. Black Women's Roundtable
7. Dialogue on Diversity
8. Hispanic Federation
9. Hispanic Technology and Telecommunications Partnership
10. League of United Latin American Citizens (LULAC)
11. MANA - A National Latina Organization
12. National Action Network
13. National Asian American Coalition
14. National Association of Neighborhoods
15. National Blacks In Government, Inc.
16. National Coalition on Black Civic Participation
17. National Congress of Black Women
18. National Diversity Coalition
19. National Foundation for Women Legislators
20. National Hispanic Media Coalition
21. National Organization of Black Elected Legislative (NOBEL) Women
22. National Puerto Rican Chamber of Commerce
23. OCA – Asian Pacific American Advocates
24. Rainbow PUSH Coalition
25. @TechLatino: The National Association of Latinos in Information Sciences and Technology
26. The Latino Coalition