

Hon. Kathleen H. Burgess  
Secretary to the Commission  
New York State Public Service Commission  
Agency Building 3  
Albany, NY 12223-1350  
Email: [secretary@dps.ny.gov](mailto:secretary@dps.ny.gov)

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2018 MAY 18 PM 2:24

Re. PSC Docket # 18-C-0125  
Date: May 14, 2018

Dear Hon. Burgess:

The National Grange, the nation's oldest rural advocacy organization, has filed many times at the Federal Communications Commission ("FCC") to express support for the Lifeline affordability program and the many rural Americans that it serves.<sup>1</sup> Because of the Lifeline program, substantial numbers of low-income Americans, including millions of rural households, are able to communicate with prospective and current employers, connect with emergency, healthcare, social, and educational services, and keep in touch with family and friends.

Today, the National Grange respectfully submits these comments to support a TracFone Wireless, Inc. ("TracFone") Petition (Docket # 18-C-0125) seeking approval to participate in the New York State Lifeline Program and receive distributions from the Targeted Accessibility Fund ("TAF") Administrator. TracFone has specifically requested that the Public Service Commission ("Commission") authorize TracFone to: (1) provide wireless Lifeline service pursuant to the New York State's Lifeline program; and (2) receive distributions from the TAF in the amount of \$11 per household per month in order to fund TracFone's enhanced Lifeline service offering.

The National Grange recognizes the importance of wireless Lifeline services for millions of low-income consumers, especially rural Americans who do not have access to robust broadband. For rural consumers, the issues around Lifeline reform hinge on service delivery and the best use of funds to

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<sup>1</sup> See National Grange Comments, *In the Matter of Bridging the Digital Divide for Low-Income Consumers, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support*, FCC WC Docket No. 17-287, 11-42, 09-197 at 1 (filed Feb. 21, 2018).

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maintain and guarantee that all Americans, including low-income households residing in rural areas, have access to essential telecommunication services at affordable prices.<sup>2</sup>

We understand that TracFone is requesting \$11 per month from TAF to provide a more enhanced service offering to New York's low-income Lifeline eligible consumers. TracFone has indicated that they will increase its voice offering from 350 minutes to unlimited and its data offering from 1 GB to 2 GB per month. The National Grange believes that this is a significant and meaningful increase for low-income consumers. Rural low-income consumers deserve to have increased and improved offerings for Lifeline services in New York.

While this will benefit all low-income New Yorkers, the National Grange notes that for rural New Yorkers improved broadband offerings is especially important. In a 2017 Pew Survey, the Pew Center found that rural Americans remain less likely than non-rural adults to have home broadband, smartphones, and other devices to connect to the Internet.<sup>3</sup> Moreover, "all persons, regardless of race or ethnicity, were less likely to use the Internet when living in rural areas, but minority rural residents face a particularly large digital divide."<sup>4</sup> Low-income rural residents, as expected, adopt broadband at a much lower rate than low-income urban residents.<sup>5</sup> Consequently, by doubling its data offering, TracFone will help bridge the digital gap for low-income and rural New Yorkers.

Respectfully Submitted,

Stephen C. Coy, Master

New York State Grange

100 Grange Place Cortland, NY 13045

(607) 756-7553

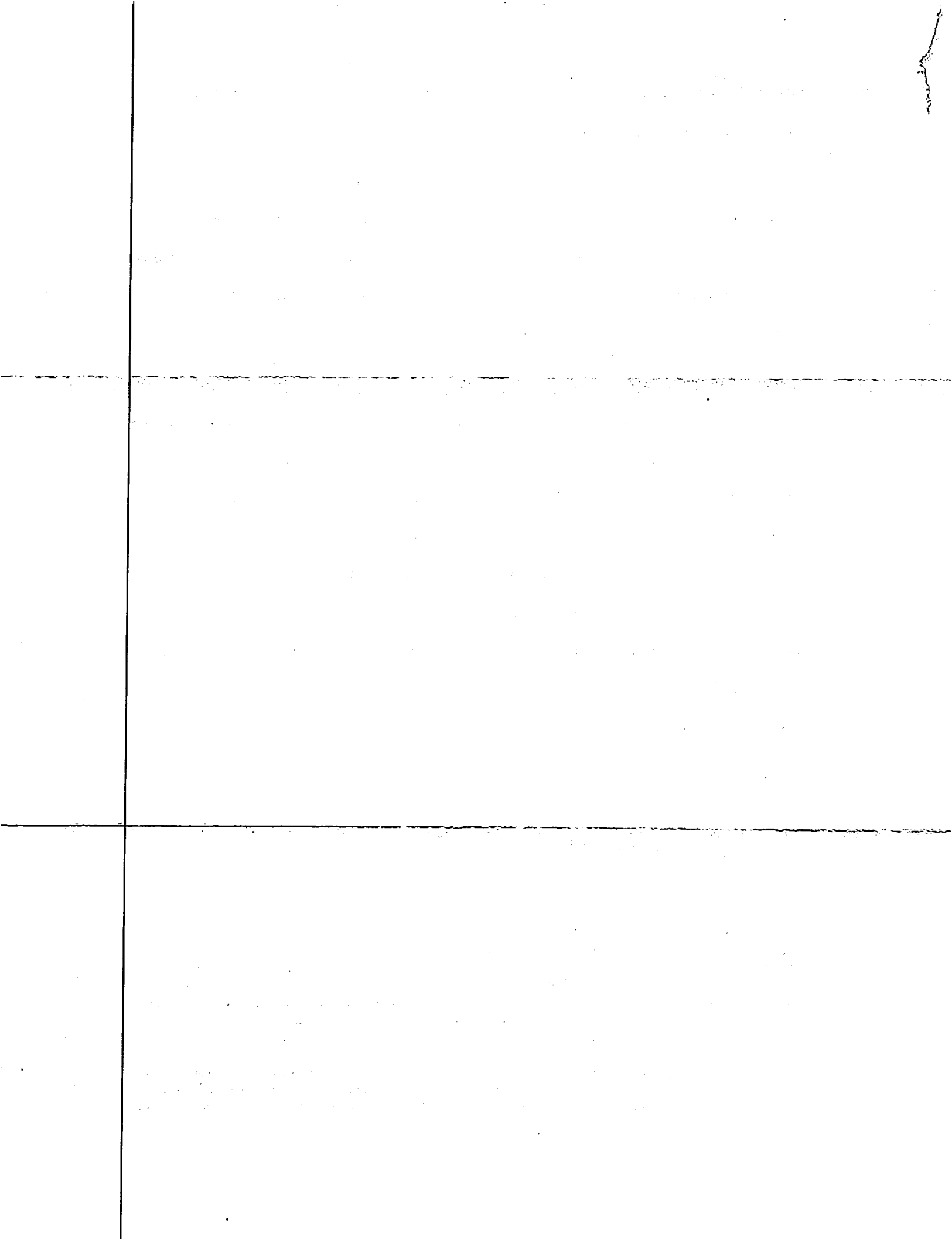
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<sup>2</sup> See Attachment 1. 2016 National Grange Journal of Proceedings.

<sup>3</sup> A. Perrin, *Digital Gap Between Rural and Nonrural America Persists*, Pew Research Center, May 19, 2017, <http://www.pewresearch.org/fact-tank/2017/05/19/digital-gap-between-rural-and-nonrural-america-persists/>.

<sup>4</sup> E. Carlson, *The State of the Urban/Rural Divide*, National Telecommunications and Information Administration, August 10, 2016, <https://www.ntia.doc.gov/blog/2016/state-urbanrural-digital-divide> ("in rural areas, 70 percent of White Americans had adopted the Internet, compared to 59 percent of African Americans and 61 percent of Hispanics").

<sup>5</sup> See *Id.* ("The biggest gap in Internet use between rural and urban Americans based on income came from those with incomes between \$25,000 and \$49,000; 66 percent of rural residents in that income range used the Internet, compared with 70 percent of their urban counterparts." At higher income ranges, rural residents adopted at the same rate as urban residents).



2. The National Grange supports continued strict enforcement of the Federal Communications Commission's national "Do Not Call List." The National Grange supports expansion of the Do-Not-Call list to include computer dialed political telemarketing, including but not limited to charities and political groups, and be it further no one calling a household for commercial or charitable request reasons may use a restricted number or call a phone with a restricted number. Telemarketers, as well as these computer or robocalls should be prohibited from calling cell phones as well. The National Grange supports the Robocall Enforcement Improvement Act.
3. The National Grange recognizes the importance of the Universal Service Fund (USF) to the American public, especially in rural communities. The National Grange urges the Federal Communications Commission (FCC) to approve any petitions by wireless telephone companies that demonstrate their ability to meet the obligations of Lifeline service, especially in rural areas, so they can serve low-income consumers with wireless Lifeline telephone service through the federal Universal Service Fund.
4. The National Grange will work with telecommunications coalitions to encourage an increase in the number of cellular phone towers in a large amount of rural America.
5. The National Grange urges U.S. Congress to expedite funding for a resilient, mobile, wireless, data network between local and state first responders and emergency personnel with federal emergency agencies, such as FEMA, Homeland Security and the National Guard.
6. The National Grange urges Congress to appropriate the necessary funding to combat the continuing cyberspace warfare threats to the United States in the 21st century.
7. The National Grange opposes any relinquishing of control of the American internet access to the UN or any foreign entity.

#### *Broadcasting*

1. The National Grange supports the concept of public broadcasting and urges improved service for our rural communities. The National Grange supports continuing the present level of federal funding for the Corporation for Public Broadcasting through self-supporting sources of financing.
2. The National Grange supports the National Rural Electric Cooperative Association in its efforts to help rural areas receive satellite TV reception. The National Grange supports legislation to ensure that satellite dish owners in rural areas pay no more for their service than cable TV subscribers in the cities do. The Grange supports regulations requiring satellite television companies to provide rural customers access to more than one predetermined set of local channels including local public access channels in the customer's region.
3. The National Grange supports the continuation of religious broadcasts on radio and television.
4. The National Grange urges Congress to maintain the Federal Communications Commission (FCC) as a watchdog agency to protect the public from unfair practices and monopolies. We oppose media mergers where one company can control all forms of media. We encourage the FCC to provide ample opportunity for new media companies and medium-sized media companies to be able to compete.
5. The National Grange supports elimination of the foul language, obscenities, and vulgar images used on TV, radio, or public places and fully supports the increased penalties for

