

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Office of the Secretary  
45 L Street NE, Washington, DC 20554.

Re: FCC WC Docket No. 11-42, Comments on State of the Lifeline Marketplace

On behalf of Asian Americans Advancing Justice | AAJC, OCA – Asian Pacific American Advocates, and the National Council of Asian Pacific Americans (NCAPA) we submit the following comments in response to the Federal Communication Commission’s (“FCC” or “Commission”) Public Notice, released on March 19, 2021. We believe the Lifeline program is essential to connecting low-income Asian American and Pacific Islander and other minority households to all facets of everyday life.

Asian Americans Advancing Justice | AAJC (“Advancing Justice | AAJC”) is dedicated to civil and human rights for Asian Americans and to promoting a fair and equitable society for all. We provide the growing Asian American community with multilingual resources, culturally appropriate community education, and public policy and civil rights advocacy. In the communications field, Advancing Justice | AAJC works to promote access to critical technology, services, and media for our communities.

OCA – Asian Pacific American Advocates (“OCA”) is a national membership-driven organization of community advocates dedicated to advancing the social, political, and economic well-being of AAPIs. OCA strongly believes that as our country continues to digitize and create modern communications networks, it is pivotal that Asian Americans and Pacific Islanders shape the policies and regulations that create the framework for that innovation.

The National Council of Asian Pacific Americans (“NCAPA”) is a coalition of 37 national Asian American Pacific Islander (AAPI) organizations around the country. Based in Washington D.C., NCAPA serves to represent the interests of the greater AAPI communities, the fastest growing racial group in the nation, and to provide a national voice for Asian American and Native Hawaiian Pacific Islander issues.

The Lifeline program, established in 1985 by the FCC assists eligible individuals in paying the recurring monthly services charges associated with telecommunication usage. While initially designed to support traditional landline service, in 2005 the FCC expanded the program to cover either a landline or a wireless/mobile option. As of last year, Lifeline assisted more than 12 million



participants, at least 6.5 million of whom are receiving broadband after the FCC modernized the program to include broadband.

Wage, education, and language proficiency gaps contribute to the digital divide within the Asian American community, a gap in which Lifeline can play a critical role in reducing. According to the 2015 1-Year ACS, there are currently 2.14 million Asian Americans and Pacific Islanders living in poverty.<sup>2</sup> The median household income of Indian Americans is \$114,261, that of Samoan Americans and Burmese Americans is \$54,193 and \$39,730, respectively. Additionally, 4.6% of Japanese Americans have less than a high school diploma, compared with 53.6% of Burmese Americans. Finally, 18.7% of Indian Americans and 20.4% of Tongan Americans are limited English proficient, compared with 48.9% of Vietnamese Americans and 42.9% of Marshallese Americans.<sup>i</sup>

Nearly 333,000 Asian Americans are on food stamps, one of the qualifiers to participate in the Lifeline program. In 2015, 2.6% of SNAP recipients were categorized as Asian American. Though this number may appear small, the divide between certain ethnic groups was stark: 2.38% of Thai Americans were enrolled in the program, compared with 67.3% of Bhutanese Americans. Furthermore, in 2016, 26% of Asian Americans and 37% of Pacific Islanders were enrolled in Medicaid or some other public insurance program.<sup>ii</sup>

In addition, these services are especially critical for Asian and Pacific Islanders in the U.S. who utilize broadband internet to financially support their family members overseas. In 2019, immigrants sent over \$550 billion of remittances to family members in low and middle income countries, allowing them to pay for necessities such as food, housing, and healthcare. For many AAPI communities, these remittances are essential.<sup>iii</sup> In Tonga, remittances accounted for nearly 41% of their total GDP and Filipino-Americans alone sent about \$10 billion back to the Philippines.<sup>iv</sup>

In order to bolster the rate of adoption of Lifeline especially among low-income communities of color, the FCC should perform targeted outreach to expand sign-up access for communities most in need of this service, such as undocumented individuals who might be dissuaded due to the social security requirements. Successful outreach can be accomplished by working with trusted community partners to create in-language informational packets, highlight the change in sign-up requirements, and provide language assistance during service enrollment.

Alongside protecting the services Lifeline offers, it is imperative that the FCC maintains the Emergency Broadband Benefit program to address a variety of different access needs and also considers a permanent broadband subsidy beyond the pandemic. Lifeline's voice services and hotspot devices are critical for communities without access to broadband and wired internet infrastructure, such as individuals struggling with digital literacy and rural and redlined neighborhoods. ISP services prove efficient, high quality internet, which makes this option best for individuals who rely on their home internet to complete their school and work.

Lifeline currently offers a \$9.25 monthly discount on service for eligible low-income subscribers and up to \$34.25 per month for those on Tribal lands—an amount that too often falls short of covering the cost of Internet service.<sup>v</sup> The Emergency Broadband Benefit program will offer up to \$50 per month towards broadband service for eligible households and up to \$75 per month for households on Tribal lands—opening up new options and services for low-income consumers who were previously limited to few plans they could afford. However, the pandemic has made clear that access to broadband and the Internet is a necessity. Even after the pandemic ends, the digital divide will still persist, and low-income households and communities of color will still benefit greatly from an increased subsidy that can realistically cover the cost of Internet service in the United States. The FCC should therefore also consider a permanent broadband subsidy to continue to make progress towards bridging the digital divide.

The Lifeline program should also continue to maintain voice services as a standalone option to ensure that benefits include individuals and households that rely primarily on voice services to stay connected. Not all communities have the digital literacy necessary to access the Internet, and these communities will still need affordable alternatives for communicating with loved ones, accessing emergency services, and participating in civic life. Furthermore, voice will remain a critical service in areas of the country that do not yet have access to broadband infrastructure—such as rural regions or redlined neighborhoods.

Sincerely,

Asian Americans Advancing Justice | AAJC  
OCA - Asian Pacific American Advocates  
National Council of Asian Pacific Americans

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<sup>i</sup> <https://www.advancingjustice-aajc.org/sites/default/files/2020-02/Lifeline%20Backgrounder.pdf>

<sup>ii</sup> <https://www.advancingjustice-aajc.org/sites/default/files/2020-02/Lifeline%20Backgrounder.pdf>

<sup>iii</sup> <https://theconversation.com/immigrants-are-still-sending-lots-of-money-home-despite-the-coronavirus-job-losses-for-now-148387>

<sup>iv</sup> <https://asia.nikkei.com/Economy/Remittances-from-overseas-Filipinos-hit-record-but-growth-slows>

<sup>v</sup> <https://slate.com/technology/2021/01/lifeline-fcc-expansion-biden-broadband-access.html>