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Maya Wiley

June 2, 2026

The Honorable Brendan Carr  
Chair  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Re: WC Docket Nos. 11-42, 17-287, 09-197, 21-450, 20-445

Dear Chair Carr,

On behalf of The Leadership Conference on Civil and Human Rights and the undersigned organizations, we write in response to the Notice of Proposed Rulemaking (NPRM) regarding Lifeline and Link Up Reform and Modernization.<sup>1</sup> The Leadership Conference is a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the rights of all persons in the United States. We consider support for low-income consumers, affordable communications, and a robust Lifeline program to be a top priority for the civil and human rights coalition. The Leadership Conference and our Media & Telecommunications task force members are uniquely qualified to offer a valuable civil rights perspective on these issues.

As the Commission has consistently found, both voice and broadband services are essential for full participation in today's economy.<sup>2</sup> People across the country particularly rely on broadband for access to news and information, education, employment, and health care. Unfortunately, some of our nation's most underserved and marginalized communities — including seniors, veterans, people of color, people with disabilities, and residents of rural areas — are often on the wrong side of the digital divide. The Lifeline program was created to help close the affordability gap that keeps many of these communities unconnected to 21st-century communications services. Millions of Americans today rely on the Lifeline program for access to affordable voice and broadband services.

<sup>1</sup> *Lifeline and Link Up Reform and Modernization; Bridging the Digital Divide for Low-Income Consumers; Telecommunications Carriers Eligible for Universal Service Support; Affordable Connectivity Program; Emergency Broadband Benefit Program, Notice of Proposed Rulemaking*, WC Docket No. 11-42 et al., 91 Fed. Reg. 16871-16893 (April 3, 2026) (NPRM).

<sup>2</sup> E.g., *Connecting America: The National Broadband Plan*, Federal Communications Commission (2010), <https://www.fcc.gov/general/national-broadband-plan>.

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The record in this proceeding is abundantly clear — the vast majority of the Commission’s proposed changes to Lifeline would severely harm families currently enrolled in the program and further widen the digital divide. Specifically, as commenters explain:

- The maintenance of support for voice-only services will benefit individuals with disabilities and *all* consumers who use voice services during emergencies, including those in rural areas. Instead of winding down support, the Commission should maintain or increase the amount of the benefit.
- The push to expand collection of social security numbers (SSNs) imposes new burdens on consumers while leaving the primary sources of fraud insufficiently addressed.
- The Commission’s proposal to limit Lifeline benefits to one benefit per *residence* would burden those who live in residences where multiple economic households live under one roof: low-income individuals who live with roommates, particularly those who suffer from housing instability, and those who live in multigenerational homes.
- The proposal to classify Lifeline as a service administered under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) is misguided and not legally sound as Lifeline performs a critical health and safety role, excluding it from the scope of PRWORA.

We describe below some of the evidence found in this proceeding that highlights the negative consequences of the Commission’s proposed changes to the Lifeline program.

### **1. Maintaining Support for Voice-Only Service Will Particularly Benefit Individuals with Disabilities and Universal Access to Emergency Services**

The Leadership Conference has advocated for the continuation of voice-only service for over a decade,<sup>3</sup> and compelling evidence in the record supports maintaining support for voice-only service. Voice service is particularly important for emergency services and emergency alerts. As the National Consumer Law Center (NCLC) points out, these alerts save lives in natural disasters such as hurricanes, flash floods, tornadoes and wildfires.<sup>4</sup>

Furthermore, as the American Association of People with Disabilities (AAPD) explains, individuals with disabilities have lower rates of access to smartphones, computers, and reliable internet connectivity compared to nondisabled populations.<sup>5</sup> As a result, traditional fixed and mobile voice services remain especially indispensable for accessing emergency services, healthcare providers, and critical personal-

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<sup>3</sup> *Letter from The Leadership Conference on Civil and Human Rights to Marlene Dortch, FCC, WC Docket No. 11-42 et al.* (filed Aug. 31, 2015).

<sup>4</sup> *Comments of the National Consumer Law Center, Common Sense Media, Communications Workers of America, The Leadership Conference on Civil and Human Rights, MediaJustice, UnidosUS, and United Church of Christ Media Justice Ministry, WC Docket No. 11-42 et al. at 13 (2026) (NCLC et al. Comments).*

<sup>5</sup> Andrew Perrin and Sara Atske, “Americans with Disabilities Less Likely Than Those Without to Own Some Digital Devices,” Pew Research (Sept. 10, 2021), <https://www.pewresearch.org/short-reads/2021/09/10/americans-with-disabilities-less-likely-than-those-without-to-own-some-digital-devices/>.

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support networks in these communities.<sup>6</sup> We agree with both NCLC and AAPD: support for voice-only service should continue as long as consumers rely on it to access Lifeline's resources.

The continued importance of voice-only service necessitates consideration of maintaining or increasing the support amount. Public utility commenters, such as the New York Public Service Commission and the Public Utility Commission of Oregon, recommend that the amount be restored to \$9.25 per household.<sup>7</sup> Groups representing businesses serving Lifeline customers, like the National Lifeline Association, also support the Commission reinstating the full Lifeline reimbursement amount for voice service.<sup>8</sup> We urge the Commission to take these recommendations into consideration as it moves forward.

## **2. Expanding SSN Collection Fails to Address Fraud, Burdens Consumers, and Chills Enrollment**

The record demonstrates a broad consensus that expanding SSN collection, either by private providers or the Universal Service Administrative Company (USAC), would fail to address fraud, burden consumers, and chill enrollment in Lifeline. National Urban League (NUL), Public Knowledge (PK), and other commenters in the docket point out the numerous issues with this proposal.

First, commenters such as PK and the Hispanic Tech and Telecom Partnership (HTTP) highlight the additional burdens this proposal will place on consumers. Low-income households already face significant challenges recertifying for the Lifeline program, which requires annual affirmation of eligibility in addition to the paperwork required to obtain the initial benefit.<sup>9</sup>

Second, as commenters like NUL and PK point out, millions of Americans have had their SSNs leaked via data breaches in the last several years — including breaches from within government agencies.<sup>10</sup> Most notably, two members of the Department of Government Efficiency (DOGE) stationed at the Social Security Administration held sensitive data of millions of Americans on a thumb drive and gave it to an

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<sup>6</sup> *Comments of the American Association of People with Disabilities*, WC Docket No. 11-42 et al. at 2 (2026) (AAPD Comments).

<sup>7</sup> *Comments of the New York Public Service Commission*, WC Docket No. 11-42 et al. at 3 (2026); *Comments of the Public Utility Commission of Oregon*, WC Docket No. 11-42 et al. at 6 (2026).

<sup>8</sup> *Comments of National Lifeline Association*, WC Docket No. 11-42 et al. at 36 (2026).

<sup>9</sup> *Comments of the Hispanic Tech and Telecom Partnership, League of United Latin American Citizens, Hispanic Federation, and MANA*, WC Docket No. 11-42 et al. at 4 (2026)(HTTP et al. Comments).

<sup>10</sup> *Comments of Public Knowledge, Everyone On, National Digital Inclusion Alliance, National Hispanic Media Coalition, Massachusetts Digital Equity Coalition, NTEN, Open Technology Institute at New America, Multicultural Media, Telecom and Internet Council, American Civil Liberties Union, Asian Americans Advancing Justice | AAJC*, WC Docket No. 11-42 et al. at 13 (2026)(Public Knowledge et al. Comments); *Comments of National Urban League, National Council of Negro Women, Multicultural Media, Telecom, and Internet Council, The Leadership Conference on Civil and Human Rights, OCA - Asian Pacific American Advocates, Media Access Project*, WC Docket No. 11-42 et al. at 5-6 (NUL Comments).

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unauthorized third-party organization.<sup>11</sup> This level of access to sensitive personal information, including SSNs and personal health information, threatens people’s privacy and likely violates long-standing federal privacy protections. It would be reckless of the Commission to require Lifeline customers to provide additional information to the federal government in light of recent data breaches.

Industry commenters, like U.S. Telecom, WTA - Advocates for Rural Broadband, and CTIA also point out that requiring providers to collect and retain full SSNs would create significant privacy and cybersecurity risks by increasing the volume of highly sensitive personally identifiable information held by providers, and would also add costs to implement.<sup>12</sup> The near-unanimous view in the record among both industry and civil-society commenters is clear: the Commission should not move forward with the proposal to expand SSN collection. The collection of this data, by either industry or USAC, is likely to suppress applications because of the associated data security risks and the additional paperwork requirements.

### 3. Restricting the Benefit to One-Per-Residence Would Burden Low-Income Individuals

Currently, the Lifeline program is insufficient because it does not emulate how people who are economically well-resourced use voice and broadband services (i.e., closer to one voice and data service per individual). At a minimum, the Commission should maintain its rule granting one Lifeline benefit per economic household.<sup>13</sup> The Commission’s proposal to limit Lifeline benefits to one benefit per *residence* would burden those who live in residences where multiple economic households live under one roof: low-income individuals who live with roommates, particularly those who suffer from housing instability, and those who live in multigenerational homes. We reject the Commission’s proposal to ration Lifeline to only those economic households fortunate enough to have their own residence.

NCLC’s comment explains that many low-income economic households experiencing housing instability choose to share a residence with one of more other economic households in order to save money.<sup>14</sup> Living with roommates is a responsible means to save money when budgets are tight. It would be antithetical to the goals of the Lifeline program to prevent these individuals from getting assistance solely because they cannot afford their own residences.

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<sup>11</sup> Stephen Fowler, Jude Joffe-Block, and Shannon Bond, “The Government Is Investigating New Claims That DOGE Misused Social Security Data,” NPR (Mar. 11, 2026). <https://www.npr.org/2026/03/11/nx-s1-5745153/doge-social-security-data-whistleblower-investigation>.

<sup>12</sup> *Comments of USTelecom*, WC Docket No. 11-42 et al. at 4-6 (2026); *Comments of WTA - Advocates for Rural Broadband*, WC Docket No. 11-42 et al. at 2 (2026); *Comments CTIA*, WC Docket No. 11-42 et al. at 10-11 (2026).

<sup>13</sup> An eligible economic household under the Lifeline program is, “any individual or group of individuals who live together at the same address and share income and expenses.” 47 C.F.R. 54.410(d)(1)(iii); *see also* [https://www.usac.org/wp-content/uploads/lifeline/documents/forms/LI\\_Worksheet\\_UniversalForms-1.pdf](https://www.usac.org/wp-content/uploads/lifeline/documents/forms/LI_Worksheet_UniversalForms-1.pdf).

<sup>14</sup> NCLC et al. Comments at 13-15.

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As noted by Smith Bagley, this proposal would harm “tribal citizens, many of whom live in multigenerational dwellings containing multiple households.”<sup>15</sup> Multiple generations of households sharing a single residence are continuing to become more and more common in the United States, which is particularly critical in difficult economic times. The U.S. Census Bureau estimated in 2020 that 7.2 percent of all households contained three or more generations under one roof,<sup>16</sup> and recent analysis suggests that this percentage has increased since the 2020 Census Bureau estimate.<sup>17</sup> If the Commission were to limit Lifeline benefits to one per residence, it could also negatively impact older adults who might live together in senior housing, parents who take in a younger generation, families who shelter a neighbor in need and also maintain their own separate households. The Commission should not move away from the current rule.

#### 4. **Classifying Lifeline as a PRWORA Service is Misguided and Legally Dubious**

The NPRM proposes to find that Lifeline is a federal public benefit under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) and would thus limit the benefit based on citizenship status. We agree with the commenters that doing so would be misguided, legally dubious, and would duplicate existing citizenship-verification processes.

We agree with NCLC’s assertion that Lifeline tracks the PRWORA exceptions (for the treatment of emergency medical conditions and short-term, non-cash, in-kind emergency disaster relief): essential communication service is necessary to access those emergency, health, and safety services.<sup>18</sup> Comments by NUL and the Benton Institute for Broadband & Society echo this sentiment and provide further discussion of the legal issues with the Commission’s proposal.<sup>19</sup> Additionally, ongoing legal challenges to the Administration’s changes to how it applies PRWORA to government benefit programs (stemming from Executive Order 14218) also threaten the Commission’s legal justification for this proposal.<sup>20</sup>

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<sup>15</sup> *Comments of Smith Bagley, Inc.*, WC Docket No. 11-42 et al., at 1, 12-17 (2026) (SBI explains they “serve thousands of multigenerational residences that are the rural equivalent of small apartment buildings. . .”).

<sup>16</sup> Chanell Washington, Thomas Gryn, Lydia Anderson and Rose M. Kreider, “In 2020, 7.2% of U.S. Family Households Were Multigenerational,” U.S. Census Bureau (June 13, 2023), <https://www.census.gov/library/stories/2023/06/several-generations-under-one-roof.html>.

<sup>17</sup> Hannah Jones, Jiayi Xu, “Under the Same Roof: Multigenerational Living in the U.S.,” Realtor (May 5, 2026), <https://www.realtor.com/research/multigeneration-2026/>.

<sup>18</sup> NCLC et al. Comments at 5-6.

<sup>19</sup> NUL Comments at 9-12; *Comments of the Benton Institute for Broadband & Society*, WC Docket No. 11-42 et al. at 22-24 (2026).

<sup>20</sup> Zach Sanfilippo and William Ferreira, “The Personal Responsibility and Work Opportunity Reconciliation Act in 2026: Implications for Entities Administering ‘Federal Public Benefits,’” Hogan Lovells (Jan. 22, 2026), <https://www.hoganlovells.com/en/publications/the-personal-responsibility-and-work-opportunity-reconciliation-act-in-2026-implications>.

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## 5. **The Commission Should Raise the Monthly Benefit, Not Lower or Freeze It**

In addition to the concerns raised above, we urge the Commission to consider raising the monthly benefit amount, rather than lowering or freezing it. This is particularly relevant as a bipartisan, bicameral working group in Congress is currently evaluating (and will eventually propose) reforms to the Universal Service Fund. It would be prudent of the Commission to seek guidance from Congress.<sup>21</sup>

We urge the Commission to take heed of the overwhelming evidence in the record opposed to the agency's proposed changes to the Lifeline program and to reverse course. Thank you for your consideration on this important issue. We look forward to working with you on this issue and others of importance to our country. If you have any questions about this letter, please contact Jonathan Walter, senior policy counsel, at [walter@civilrights.org](mailto:walter@civilrights.org).

Sincerely,

The Leadership Conference on Civil and Human Rights  
American Association of People with Disabilities  
Common Cause  
Common Sense Media  
Japanese American Citizens League  
National Action Network  
National Consumer Law Center, on behalf of its low-income clients  
National Disability Rights Network (NDRN)  
National Hispanic Media Coalition  
UnidosUS  
United Church of Christ Media Justice Ministry

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<sup>21</sup> Press Release, Senator Ben Ray Luján, Fischer Announce Bipartisan, Bicameral Universal Service Fund Working Group (June 12, 2025), <https://www.lujan.senate.gov/newsroom/press-releases/lujan-fischer-announce-bipartisan-bicameral-universal-service-fund-working-group/>.