

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Bridging the Digital Divide for Low- Income Consumers	)	WC Docket No. 17-287
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
Affordable Connectivity Program	)	WC Docket No. 21-450
	)	
Emergency Broadband Benefit Program	)	WC Docket No. 20-445
	)	

**REPLY COMMENTS OF THE NATIONAL ASSOCIATION OF  
STATE UTILITY CONSUMER ADVOCATES, MAINE OFFICE OF PUBLIC  
ADVOCATE, OREGON CITIZENS UTILITY BOARD, NEW JERSEY DIVISION OF  
RATE COUNSEL, PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE, AND  
THE UTILITY REFORM NETWORK**

June 2, 2026

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**I. INTRODUCTION AND SUMMARY**

Pursuant to the Federal Communications Commission (Commission or FCC)’s February 18, 2026 Notice of Proposed Rulemaking (Lifeline NPRM or NPRM), the National Association of State Utility Consumer Advocates (NASUCA)<sup>1</sup> submits Reply Comments in the above-captioned matters and to supplement its Initial Comments filed on or about May 4, 2026.

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<sup>1</sup> NASUCA is a voluntary association of 62 consumer advocate offices. NASUCA members represent the interests of utility consumers in 45 states, the District of Columbia, Puerto Rico, Barbados and Jamaica. NASUCA is incorporated in Florida as a non-profit corporation. NASUCA’s full members are designated by the laws of their respective jurisdictions to represent the interests of utility consumers before state and federal regulators and in the courts. Members operate independently from state utility commissions. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General’s office). NASUCA’s associate and affiliate members also represent the interests of utility consumers but are not created by state law or do not have statewide authority. Some NASUCA member offices advocate in states whose respective state commissions do not have jurisdiction over certain telecommunications issues.

NASUCA appreciates the expansive scope and breadth of the comments filed to date in this proceeding. NASUCA does not respond to every position advanced in the record. Its silence on any particular issue is not agreement or disagreement with either the Commission's proposals or commenters' proposals and arguments.

NASUCA's Reply Comments focus on three key issues raised in response to the Lifeline NPRM. First, NASUCA joins the overwhelming support expressed throughout the record opposing the proposed phase-down of voice support and urges the Commission to retain Lifeline voice support in its current form. Second, NASUCA continues to implore the Commission to refrain from collecting all nine digits of consumers' Social Security Numbers (SSN), as such collection raises significant privacy and data security concerns without sufficient justification. Third, NASUCA opposes any proposal to base Lifeline eligibility on a per-address rather than per-household standard, as doing so would substantially restrict access to Lifeline services for vulnerable consumers, including those residing in multi-family, temporary, or shared housing arrangements.

## **II. REPLY COMMENTS**

### **A. The Record Shows that the Commission Should Preserve Voice-Only Lifeline Service and Should Restore the Full \$9.25 Subsidy.**

Voice service remains an essential communications tool for many low-income consumers, particularly seniors, individuals with disabilities, rural residents, and consumers living in areas where broadband or wireless coverage remains unreliable or unaffordable. Numerous initial comments and the record support opposing any reduction in support for voice-only Lifeline service and restoring the prior \$9.25 monthly subsidy level.

NASUCA joins the substantial number of commenters opposing the continued phase-down of voice support. Lifeline's statutory purpose is to ensure access to essential

communications services for low-income households, and that purpose is not served by favoring one service type over another.<sup>2</sup> The Commission should ensure that Lifeline reforms preserve support for both voice and broadband services, thereby allowing consumers and providers the flexibility to select the communications service that best fits individual household circumstances.

The record cements the problem that voice reliability concerns persist in many parts of the country. As the Ohio Consumers' Counsel observed, some rural consumers continue to experience inadequate wireless coverage and cannot reliably obtain affordable wireless voice service.<sup>3</sup> Likewise, the California Public Utilities Commission emphasized that seniors, individuals with disabilities, and rural residents still rely on traditional voice service, particularly in geographically remote and difficult-to-serve areas where broadband and wireless alternatives remain inadequate and unreliable.<sup>4</sup>

NARUC notes that “nothing has changed since the last waiver was granted.”<sup>5</sup> NASUCA agrees with NARUC’s assertion that the extensive support for retaining voice-only Lifeline support--that has existed in the record since 2017--remains largely un rebutted.<sup>6</sup> In fact, the continued existence of more than 160,000 Lifeline subscribers relying on voice-only or bundled services that do not meet broadband minimum service standards confirms that there remains a significant population dependent upon these services.<sup>7</sup> The FCC’s own 2025 Universal Service Monitoring Report identified approximately 181,000 subscribers to voice-only Lifeline services

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<sup>2</sup> The legal foundation for universal service is established in 47 U.S.C. Section 254, which dictates that universal service principles be based on access to quality services at just, reasonable, and affordable rates.

<sup>3</sup> Off. of the Ohio Consumers' Couns., Comments at 3, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>4</sup> Cal. Pub. Utils. Comm'n, Comments at 6, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>5</sup> Nat'l Ass'n of Regul. Util. Comm'rs, Comments at 2, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

across states and territories nationwide. These vulnerable consumers should not be excluded through continued subsidy reductions.<sup>8</sup>

Numerous stakeholder comments explained that voice-only service remains critically important. The District of Columbia Public Service Commission pointed out that while enrollment in voice-only Lifeline service has declined, subscribers continue to rely on the service because broadband remains unaffordable even with available discounts.<sup>9</sup> For those consumers, voice-only Lifeline service provides access to emergency services, healthcare providers, employers, caregivers, and family members.<sup>10</sup>

Reducing support for voice-only service increases out-of-pocket costs for the nation's most economically vulnerable consumers and risks further disconnecting households from essential communications services. Many stakeholders demonstrated that voice-only Lifeline support remains necessary to ensure continued access to essential communications services for vulnerable consumers. The record further supports increasing its level to better reflect current affordability needs and program goals. NASUCA agrees with other stakeholders that the current reduced subsidy amount is inadequate for many low-income households and undermines the affordability goals of the Lifeline program. As cited by the Washington Utilities and Transportation Commission, the Benton Institute for Broadband & Society reported in 2023 that 78 percent of Lifeline subscribers "say they cannot afford a Lifeline co-pay of \$10 per month."<sup>11</sup> The Commission should not ignore this sobering evidence.

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<sup>8</sup> *Id.* at n.2.

<sup>9</sup> Comments of the Pub. Serv. Comm'n of the Dist. of Columbia at 2, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>10</sup> *Id.*; See also Adrienne B. Furniss, *The Importance and Effectiveness of the Lifeline Program*, Benton Inst. for Broadband & Soc'y (Aug. 28, 2023), <https://www.benton.org/blog/importance-and-effectiveness-lifeline-program>

<sup>11</sup> See Comments of the Washington Utilities and Transportation Commission and Public Counsel Unit of the Washington Attorney General's Office at 4, WC Docket No. 11-42, et al. (filed May 4, 2026) citing Adrienne B. Furniss, *The Importance and Effectiveness of the Lifeline Program*, Benton Inst. for Broadband & Soc'y (Aug. 28, 2023), <https://www.benton.org/blog/importance-and-effectiveness-lifeline-program>

NASUCA asserts that the current reduced subsidy amount no longer reflects the realities facing low-income consumers and fails to provide sufficient support to maintain affordable service. NASUCA agrees with the New York State Public Service Commission and other stakeholders that the Commission should restore the voice-only support level to \$9.25 per month.<sup>12</sup> As further explored by the Public Utility Commission of Oregon and the Oregon Broadband Association, maintaining a lower subsidy for voice service creates an inequitable distinction between similarly situated low-income households solely based on the type of communications service selected.<sup>13</sup> Similarly, the Alaska Telecom Association emphasized that voice service remains an important component of communications offerings in high-cost and remote areas where providers must rely on a range of technologies to meet consumer needs.<sup>14</sup> NASUCA agrees with these comments because reducing or eliminating support for voice service risks disrupting service arrangements that are functioning effectively for low-income households in those regions. NASUCA contends that Lifeline support should reflect the program's core mission of affordability and universal access, regardless of whether a household chooses voice, broadband, or bundled services.

For these reasons, NASUCA urges the Commission to discontinue the voice support phase-down and preserve voice-only Lifeline support. In addition, NASUCA recommends the Commission restore the subsidy amount to \$9.25 per month. Doing so would reinforce Lifeline's longstanding goals of affordability, accessibility, consumer choice, and universal service.

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<sup>12</sup> N.Y. State Pub. Serv. Comm'n, Comments at 3, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>13</sup> Pub. Util. Comm'n of Or. & Or. Broadband Ass'n, Comments at 6, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>14</sup> Alaska Telecom Ass'n, Comments at 2, WC Docket No. 11-42 et al. (filed May 4, 2026).

**B. The Record Shows That Requiring Full Social Security Numbers Would Increase Privacy and Security Risks Without Improving Program Integrity.**

NASUCA opposes any requirement that Lifeline applicants submit the full nine digits of their SSN for enrollment or eligibility verification. The record overwhelmingly supports this position. The record demonstrates that the Commission's current framework, requiring only the last four digits of a SSN alongside an applicant's name, date of birth, and address, already provides sufficient information to support eligibility verification while reducing unnecessary exposure of highly sensitive personal data.

A majority of stakeholder comments note that the Commission has previously recognized the importance of safeguarding consumer information and has engaged in efforts to train staff and improve handling protocols for sensitive data in the Lifeline context. That recognition underscores a core principle that should continue to guide program administration: data minimization is a foundational privacy and security best practice, particularly where vulnerable populations are involved.

Multiple stakeholders point out that requiring full SSNs would amplify privacy and security risks without enhancing program integrity. The Minnesota Department of Commerce correctly observes that applicants already provide substantial identifying information, and that requiring full SSNs would heighten the risk of identity theft while adding little incremental value to eligibility verification.<sup>15</sup> This elevated risk would apply across all states, including those participating in and those opted out of the National Lifeline Accountability Database (NLAD).<sup>16</sup>

Similarly, USTelecom emphasizes that collecting full SSNs would be inconsistent with widely recognized industry and regulatory best practices, which favor minimizing the collection

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<sup>15</sup> Minn. Dep't of Commerce, Comments at 2, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>16</sup> *Id.*

and retention of sensitive data.<sup>17</sup> NASUCA agrees with the widespread concern expressed by stakeholders--including Commission representatives, consumer advocate groups, and telecommunications providers--that expanding SSN collection would impose substantial operational burdens on providers, necessitating new compliance systems, enhanced security infrastructure, and ongoing risk management obligations.

The problem of “program integrity” will not be strengthened by a requirement for full SSNs. Individuals who obtain SSNs fraudulently would already possess valid nine-digit numbers; thus, expanding collection would not prevent such bad actors from participating.<sup>18</sup> Instead, it would expose a significantly larger population of legitimate applicants to increased risk in the event of a data breach.<sup>19</sup> The Oklahoma Rural Telecommunications Coalition also provides important evidence documenting the growing frequency and severity of consumer data breaches, which reinforces the conclusion that additional collection of sensitive identifiers would increase systemic risk exposure without providing commensurate benefits.<sup>20</sup>

These concerns are **not** theoretical. As the California Public Utilities Commission notes, mandatory full SSN collection could deter enrollment by eligible consumers, including domestic violence survivors and individuals who have previously experienced identity theft.<sup>21</sup> Public Knowledge similarly highlights the scale of modern data exposure risks, including large-scale breaches involving federal databases and the documented prevalence of SSNs in the majority of reported data breaches in recent years.<sup>22</sup> These realities underscore the heightened danger of

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<sup>17</sup> USTelecom – The Broadband Ass’n, Comments at 9, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>18</sup> See Wash. Utils. & Transp. Comm’n, Comments at 4, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>19</sup> *Id.*

<sup>20</sup> Okla. Rural Telecomm. Coal., Comments at 10–12, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>21</sup> Cal. Pub. Utils. Comm’n, Comments at 12, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>22</sup> Pub. Knowledge, Nat’l Digital Inclusion All., Nat’l Hispanic Media Coal., Open Tech. Inst. at New Am., Multicultural Media, Telecom & Internet Council (MMTC), Am. Civil Liberties Union, Asian Am. Advancing Justice | AAJC, EveryoneOn, Mass. Digital Equity Coal., & NTEN, Comments at 13, WC Docket No. 11-42 et al. (filed May 4, 2026).

expanding SSN collection requirements in a program serving low-income households--precisely the populations Lifeline is designed to serve.

Considering this significant record of evidence, NASUCA urges the Commission to reject requiring collection of full SSNs for Lifeline enrollment or eligibility verification. Maintaining the current limited SSN collection approach counterbalances program integrity with the critical need to protect consumers from unnecessary privacy risks, identity theft, and cybersecurity vulnerabilities.

**C. Record Evidence Shows That a Per-Residence Rule Would Reduce Access to Lifeline for Eligible Low-Income Households Without Improving Program Integrity.**

NASUCA strongly opposes any proposal to shift Lifeline eligibility from a per-household standard to a per-residence or per-address basis. A review of the record does not support such a foundational change. The existing one-per-household framework appropriately recognizes that multiple distinct economic households may reside at a single residence or address and is essential to ensuring that eligible low-income consumers are not arbitrarily excluded from the program.

The record in this matter demonstrates that adopting a per-residence limitation would significantly impede access to Lifeline for the most vulnerable consumers. As the National Multifamily Housing Council explains, a substantial share of the U.S. population resides in multifamily housing that may receive some form of government financial support, and many such households include individuals who independently qualify for Lifeline under 47 U.S.C. § 54.409.<sup>23</sup> A per-address rule would endanger support to eligible individuals simply because they share housing with others at the same location.

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<sup>23</sup> Nat'l Multifamily Hous. Council, Nat'l Apartment Ass'n & Real Estate Tech. & Transformation Ctr., Comments at 4, WC Docket No. 11-42 et al. (filed May 4, 2026).

The Commission previously concluded that “it would be inappropriate to exclude otherwise eligible consumers solely because they lack a unique residential address,” and warned that a per-address approach could “have the unintended consequence of excluding low-income consumers from participation in Lifeline.”<sup>24</sup> This reasoning remains sound today because the underlying housing realities have not changed in a manner that would justify departing from that established policy as further demonstrated by the stakeholder comments in this proceeding.

The proposed shift would also create administrative complications and consumer confusion. As the Commission itself noted in the Notice, providing Lifeline support on a first-come, first-served basis at a given address would arbitrarily favor one eligible household over another and would be difficult for both providers and consumers to understand and administer consistently.<sup>25</sup>

Numerous comments caution against disrupting the existing framework. For example, the New York State Public Service Commission emphasizes that the current rules were intentionally designed to allow multiple separate economic households at a single address to receive Lifeline support, with verification procedures in place to prevent improper duplication.<sup>26</sup> NYSPSC also warns that revising this long-standing framework risks inadvertently excluding eligible families, particularly in settings where multiple unrelated individuals or families share housing, including apartments, group homes, and other shared living arrangements.<sup>27</sup> The Alaska Telecom Association similarly underscores that the Commission’s prior rationale for rejecting a one-per-address rule remains valid, particularly given the prevalence of shared

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<sup>24</sup> *Lifeline and Linkup Reform and Modernization, et al.*, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6692 ¶ 80 (2012),

<sup>25</sup> *Id.* at 5-6.

<sup>26</sup> N.Y. State Pub. Serv. Comm’n, Comments at 2, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>27</sup> *Id.*

housing arrangements and the importance of ensuring that eligibility determinations do not turn on housing configurations rather than a household's economic need.<sup>28</sup>

The record also reflects the scale of housing instability and shared living arrangements that would be disadvantaged by a per-address limitation. As noted by the National Consumer Law Center, and supported by data from the National Alliance to End Homelessness, millions of households are severely housing cost-burdened or living in doubled-up arrangements.<sup>29</sup> These conditions establish that a per-residence limitation would disproportionately impact precisely the low-income populations Lifeline is intended to serve.

For these reasons, NASUCA urges the Commission to retain the current one-per-household eligibility standard. Maintaining this framework ensures that Lifeline continues to function as an equitable, administrable, and targeted support mechanism for eligible low-income consumers, regardless of shared or nontraditional housing arrangements.

### **III. CONCLUSION**

For the foregoing reasons, NASUCA recommends the Commission to preserve and strengthen the Lifeline program in a manner consistent with its core statutory objectives. Specifically, NASUCA urges the Commission to discontinue the voice support phase-down and to preserve voice-only Lifeline service. NASUCA further recommends that the Commission restore the voice-only support amount to \$9.25 per month to better advance the program's longstanding goals of affordability, accessibility, consumer choice, and universal service.

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<sup>28</sup> Alaska Telecom Ass'n, Comments at 4, WC Docket No. 11-42 et al. (filed May 4, 2026).

<sup>29</sup> Nat'l Consumer Law Ctr., Common Sense Media, Commc'ns Workers of Am., Leadership Conf. on Civil & Hum. Rts., MediaJustice, UnidosUS & United Church of Christ Media Justice Ministry, Comments at 14, WC Docket No. 11-42 et al. (filed May 4, 2026).

In addition to, and in light of, the substantial record evidence, NASUCA urges the Commission to reject any requirement to collect full SSNs for Lifeline enrollment or eligibility verification. Maintaining the current limited SSN collection approach strikes the right balance between program integrity with the critical need to protect consumers from unnecessary privacy risks, identity theft, and cybersecurity vulnerabilities.

Finally, NASUCA urges the Commission to retain the current one-per-household eligibility standard. Preserving this framework ensures that Lifeline continues to operate as an equitable, administrable, and targeted support mechanism for eligible low-income consumers, including those residing in shared or nontraditional housing arrangements.

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