



By Electronic Delivery

November 4, 2015

Tom Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197; Connect America Fund, WC Docket No. 10-90.

Dear Chairman Wheeler:

The Telecommunications Industry Association<sup>1</sup> (“TIA”) hereby submits this ex parte communication to the Federal Communications Commission (“Commission”) to expand on our prior comments on Lifeline and Link Up Modernization.<sup>2</sup>

TIA seeks to associate itself with Connected Nation’s recommendations that effective expansion of Lifeline should include broadband depends on engaging community institutions that are already serving the target, low-income population, specifically:<sup>3</sup>

- Allowing community organizations a form of access to the national income verification and accountability database, so they can determine whether a patron meets the Lifeline program requirements;
- Giving community institutions the option either to validate each recipient of connectivity as qualifying for Lifeline, or allow the institution to receive the Lifeline discount based on

---

<sup>1</sup> TIA is a Washington, DC-based trade association and standard developer that represents the global information and communications technology (ICT) industry through standards development, advocacy, tradeshows, business opportunities, market intelligence, and world-wide environmental regulatory analysis. For over eighty years, TIA has enhanced the business environments for broadband, mobile wireless, information technology, networks, cable, satellite, and unified communications. TIA’s hundreds of member companies’ products and services empower communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. TIA is an accredited standard development organization for the ICT sector by the American National Standards Institute (ANSI).

<sup>2</sup> See, Lifeline and Link Up Reform and Modernization et al., WC Docket No. 11-42 et al., Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71, 80 Fed. Reg. 42760 (2015) (“Notice”).

<sup>3</sup> See, Comments of Connected Nation Inc. “Lifeline” docket, WC 11-42, 09-197 and 10-90 (filed August 31, 2015)

the poverty rate of the surrounding community or of the population served by the community-based organization or entity.

As we observed in our own reply comment "Government policies must promote the role of ICTs in advancing healthcare, particularly the harnessing of patient-generated health data from remote monitoring devices and services which improve the quality of care for Americans while reducing costs for patients."<sup>4</sup>

TIA consequently additionally recommends that the FCC act to encourage more coordination with healthcare remote monitoring providers, especially those providing support for Lifeline eligible patients with chronic care conditions. We suggest that recognizing healthcare providers engaged in furnishing remote monitoring services as community institutions in the manner envisioned by Connected Nation. Among the benefits of this approach, these chronic care health care providers are clearly well positioned to assist potential Lifeline broadband clients in the operation of remote monitoring devices.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being electronically filed via ECFS.

Respectfully submitted,

Telecommunications Industry Association

By: MU\_\_\_\_\_

Mark Uncapher  
Director, Government Affairs

TELECOMMUNICATIONS INDUSTRY ASSOCIATION  
1320 Court House Road  
Suite 200  
Arlington, VA 22201  
(703) 907-7700

cc:  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
Gigi B. Sohn  
Jonathan Chambers  
Marlene H. Dortch, Secretary

---

<sup>4</sup> See, Reply Comments of TIA . "Lifeline" docket, WC 11-42, 09-197 and 10-90 (filed September 30, 2015)