



City of Portland Office of Management and Finance
Bureau of Revenue and Financial Services, Revenue Division

Office for Community Technology

Ted Wheeler, Mayor
Tom Rinehart, CAO
Ken Rust, CFO
Thomas W. Lannom, Division Director
Ann Goldenberg, Manager
111 SW Columbia St., Suite 600
Portland, Oregon 97201-5840

▲ Broadband & Communications Policy

▲ Cable Regulation & Consumer Protection

▲ Utility Franchises, Licenses & Wireless

March 15, 2017

Chairman Pai
Federal Communications Commission
445 Twelfth Street, SW
Washington DC 20554

Re: *Comment on Request for Reconsideration Concerning Lifeline Broadband Providers*, WC
Docket Nos. 09-197, 11-42

Dear Chairman Pai:

We appreciate the opportunity to submit comments in response to *the Request for Reconsideration Concerning Lifeline Broadband Providers*. The City of Portland, Oregon, is committed to eliminating broadband access and affordability gaps so our residents can achieve near universal adoption of broadband. In Portland, 28% of Hispanic households and households with residents 65 or older don't have Internet at home. This figure rises to 29% for households with income under \$30,000. The Portland Broadband Strategic Plan and Digital Equity Action Plan lay out a holistic strategy to address inequities in digital access, literacy and relevance and increase marketplace competition.

The City of Portland is also on record supporting the FCC's efforts to reform and modernize the Lifeline Program to include access to the Internet for low income residents.

However, we agree with our colleagues at the Leadership Conference of Civil and Human Rights that the FCC's Order on Reconsideration adopted February 3, 2017 "delays an array of innovative and high quality Lifeline broadband offerings and has a chilling effect on other potential Lifeline broadband entrants. The new LBP designation process is critical for increasing competition and facilitating competition and innovation in the Lifeline broadband program, and we urge the Federal Communications Commission to resume the designation process immediately."

While we recognize the efforts of the FCC to prevent waste, fraud, and abuse in the Lifeline program and applaud actions to safeguard the funds for those who truly need Lifeline assistance, we believe the FCC's Order prohibits new providers from passing on benefits to deserving low income families. These families live without the margins afforded by wealth, including the time

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needed to recover from missed opportunities. Delaying Lifeline funding forces far too many deserving families go without the assistance that could be available now. Their punishment should not be the result of others who committed waste, fraud, and abuse. Instead, we encourage the FCC to continue addressing the misuse of Lifeline funds while actively assisting poor families in accessing broadband internet.

Sincerely,

A handwritten signature in black ink, appearing to be 'Ann Goldenberg', with a long, sweeping line extending from the end of the signature towards the top right of the page.

Ann Goldenberg

Division Manager, Office for Community Technology