

September 21, 2012

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WC Docket No. 11-42
WC Docket No. 03-109
CC Docket No. 96-45

Dear Ms. Dortch:

On behalf of our members and supporters as well as for all of America's working poor, we are writing to support efforts to include CHIP as a qualifying Lifeline Program. CHIP (Children's Health Insurance Program), a state and federal partnership program that works closely with Medicaid, is not currently a qualifying federal assistance program, except in states where CHIP is administered as part of Medicaid. As you know, Medicaid is a qualifying program for Lifeline.

We believe that adding CHIP to the list of qualifying assistance programs will advance the goal of ensuring universal availability of telecommunications services to low-income consumers.

In several states, CHIP and Medicaid are combined into one program; in these states, families in CHIP may qualify for Lifeline through their Medicaid participation. However, in other states, CHIP is administered as a separate child health program or is offered as a combination program. This is where the challenges occur for the working poor. Under the current FCC program rules, a child who receives CHIP benefits in a state that has a separate child health program will not enable his or her household to qualify for Lifeline benefits. In states that have a combination program, a household's eligibility for Lifeline service depends on whether that particular state's rules qualify the child for CHIP benefits through a separate program. This process is complicated, discriminatory and unfair. Variations in the administration of CHIP by states should not limit access to Lifeline to these families who could benefit greatly from the programs' services.

Including CHIP as a Lifeline-qualifying assistance program without regard to how any specific state administers CHIP, would substantially lower the economic barrier to telephone service for working poor families, a group the federal and state governments have identified as unable to afford health coverage for their children. We urge you to include CHIP as a qualifying Lifeline program in all states without regard to how any state chooses to administer its CHIP program.

Thank you for your consideration.

Submitted electronically by Cleo Manuel Stamatou on behalf of:

Richard Fiesta, Director of Government and Political Affairs, Alliance for Retired Americans¹

¹ The Alliance for Retired Americans is a nationwide organization, founded in May 2001, with four million members. Our primary objective is to enroll and mobilize retired union members and other seniors and community activists into a

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nationwide grassroots movement advocating a progressive political and social agenda that respects work and strengthens families.

² The Community Action Partnership is the nonprofit, national membership organization representing the interests of the 1,100 Community Action Agencies (CAAs) across the country that annually help 20 million low-income Americans achieve economic security.

³ Founded in 1971, Consumer Action is a national non-profit education and advocacy organization serving more than 8,000 community-based organizations with training, educational modules, and multi-lingual consumer publications. For details, visit consumer-action.org.

⁴ The Hispanic Federation provides grants to a broad network of Latino non-profit agencies serving the most vulnerable members of the Hispanic community and advocates nationally with respect to the vital issues of education, health, immigration, economic empowerment, civic engagement and the environment.

⁵ LULAC is the largest and oldest Hispanic Organization in the United States. LULAC advances the economic condition, educational attainment, political influence, health and civil rights of Hispanic Americans through community-based programs operating at more than 900 LULAC councils nationwide. The organization involves and serves all Hispanic nationality groups.

⁶ The Maryland Consumer Rights Coalition (MCRC) advances and protects fairness and justice for Maryland consumers through research, education, and advocacy. For more information, visit Marylandconsumers.org.

⁷ NCL, founded in 1899, is the nation's pioneering consumer organization. Our non-profit mission is to protect and promote social and economic justice for consumers and workers in the United States and abroad. For more information, visit <http://www.nclnet.org>.