

**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

**COMMENTS OF THE  
MICHIGAN PUBLIC SERVICE COMMISSION**

On February 23, 2026, the Federal Communications Commission (FCC) released a Notice of Proposed Rulemaking (NPRM) in the above captioned proceedings seeking comment regarding proposed reforms to enhance the Lifeline program integrity and combat waste, fraud, and abuse.<sup>1</sup> Per the schedule established in the NPRM, initial comments are due May 4, 2026 and reply

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<sup>1</sup> FCC’s February 23, 2026, NPRM <https://docs.fcc.gov/public/attachments/FCC-26-8A1.pdf>:

comments are due June 2, 2026.<sup>2</sup> The Michigan Public Service Commission (MPSC) offers the following comments.

### **Consumer Choice During Enrollment and Transfer**

Among other areas of interest, the FCC seeks comment as to whether it should apply the one transfer per calendar month limitation for Lifeline, or whether that limitation should be modified, such as placing a 60- or 90-day freeze on transfers after enrollment.<sup>3</sup> The MPSC cautions the FCC in adopting a particular transfer freeze timeline. Some Lifeline customers may find themselves in a situation where they have signed up with a Lifeline provider, but after obtaining the service they are experiencing issues with reliability of coverage, quality of service, device issues, etc. These customers may attempt to resolve the issue with the provider, but if they are unsuccessful, then they will be left without a service that meets their individual needs. If the FCC were to adopt a transfer freeze requirement that is too stringent, some Lifeline customers may be out of service for 2-3 months until they are able to transfer to a different Lifeline provider. The MPSC suggests that if the FCC were to implement a transfer freeze, then it should also provide an opportunity for customers to be able to transfer to a new provider if they are having service or device issues. The MPSC believes that implementing a transfer freeze could harm these vulnerable customers.

Additionally, the FCC seeks comment regarding number portability issues

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<sup>2</sup> Federal Register April 3, 2026, Publication [Federal Register: 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](#)

<sup>3</sup> *Id.* at p 15.

arising from the benefit transfer process in Lifeline.<sup>4</sup> The MPSC believes that any Lifeline customer seeking to transfer service to a new provider should be entitled to port their existing telephone number without issue or distress. Allowing customers to keep their existing phone number is beneficial for numerous reasons such as consistency and clear communication with family members, doctor offices, government agencies and assistance programs, and the ability to use two-factor authentication. The MPSC is concerned that there may be some instances where a Lifeline customer has attempted to port their telephone number to a new provider, and there is either a communication breakdown between the customer and their existing provider, or situations where the customer has spent a significant amount of time and effort attempting to follow the existing provider's process, only to be informed that they are not able to port the number. In these particular instances, customers may simply give up and transfer to a new provider and be assigned a new telephone number, which is burdensome to any customer, especially those that are participating in the Lifeline program. The MPSC would encourage the FCC to impress upon the Lifeline providers that when transferring service, customers are entitled to port their number to a new provider. For providers that fail to comply with the FCC's porting requirements, the MPSC would encourage the FCC to implement penalties to help deter providers to not properly complete the porting request in compliance with the FCC's rules.<sup>5</sup>

### **Support for Consumers Reliant on Voice Services**

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<sup>4</sup> *Id.*

<sup>5</sup> *Id.* at p 15.

The FCC seeks comment on whether the current \$5.25 support should remain for voice-only Lifeline service.<sup>6</sup> In past filings with the FCC, the MPSC has expressed concerns regarding the elimination of standalone voice support. The MPSC stated in comments to the FCC on January 23, 2018, that “[t]he MPSC reiterates that it opposes a phase-down of the voice-only Lifeline service. We believe that the option of voice-only Lifeline service should remain for all Lifeline customers and those customers should all continue to receive the \$9.25 support.”<sup>7</sup> In its April 19, 2021 filing, the MPSC stated “[t]he MPSC continues to recommend against the phase-down support for voice-only Lifeline service.”<sup>8</sup> The MPSC believes that voice service is vital to a consumer’s ability to access public safety resources and participate in today’s society. While the number of subscribers to Lifeline voice-only has continued to decrease, active customers subscribing to this voice-only service still remain. There are also areas within the state of Michigan that potentially lack the availability of reliable alternative service, and the MPSC believes that it may be unattainable for Lifeline subscribers to find alternative, workable, and affordable voice-only service.

If the voice-only benefit were eliminated, it is also unclear whether the affected customers would transition to qualifying bundled plans or stop subscribing to Lifeline altogether, as there are multiple factors impacting the adoption of these services. The MPSC believes that in some situations, a voice-only Lifeline customer

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<sup>6</sup> *Id.* at p 23.

<sup>7</sup> MPSC January 23, 2018, Comments to the FCC, p 8, <https://www.fcc.gov/ecfs/document/101231633117042/1>.

<sup>8</sup> MPSC April 19, 2021, Comment to the FCC, p 2, <https://www.fcc.gov/ecfs/document/10419455328702/1>.

may not be able to afford bundled service without an increase in the current bundled Lifeline support amount. This concern regarding the bundled Lifeline support amount was stated in the MPSC's April 19, 2021 comments to the FCC:

Lastly, the MPSC continues to have concerns regarding the affordability for customers when obtaining Lifeline voice and broadband service (bundled service). Currently, the support amount for the bundled service is \$9.25 which is the same amount for standalone broadband service. Qualifying Lifeline customers are financially vulnerable and should not be expected to obtain a bundled service without an increased support amount. If the Lifeline customer is receiving bundled services, then it would seem appropriate that the support amount should increase.<sup>9</sup>

Additionally, voice-only Lifeline customers may not be able to afford the equipment cost that is required to acquire broadband service. Lastly, some customers may not understand how to use broadband services, or simply just want voice-only service.

Due to the diverse geological landscape within Michigan, there may be locations where voice-only service is the only reliable form of communication since wireless, broadband, and other alternatives may not be reliable or accessible. If the voice-only benefit is eliminated and subscribers are forced to switch to bundled services, it is possible that for those subscribers, the broadband component of the service may not be used. If the customer wanted to and could afford to use the broadband service, they would likely already be subscribed to a bundled service. The removal of the voice-only service could prohibit customers from obtaining service entirely. The MPSC has previously expressed its concerns regarding this issue to the FCC in its comments on January 23, 2018. In those comments, the

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<sup>9</sup> MPSC April 19, 2021, Comment to the FCC, p 3, <https://www.fcc.gov/ecfs/document/10419455328702/1>.

MPSC stated:

The MPSC continues to believe that customers should have the option to continue receiving Lifeline support for voice-only service. If the only option for customers to obtain Lifeline voice is by combining the service with broadband without increasing financial support, the additional costs associated with acquiring two services may prohibit customers from obtaining service. Also, the low-income or elderly Lifeline customer may not have the means to obtain broadband service because of equipment or financial reasons, and they may also not have a need for broadband service. The MPSC recommends that Lifeline customers be offered stand-alone voice, stand-alone broadband, and a combination of both voice and LBP services.<sup>10</sup>

The MPSC believes that one of the factors for the lower rate of participation in Lifeline may be due to the minimal benefit amount that program participants receive. As expressed in our December 8, 2021 filing of comments regarding the Affordable Connectivity Program, the MPSC stated, “[a]s the FCC is aware, there is an under-utilization of the Lifeline program by potential eligible households.”<sup>11</sup> The MPSC believes that forcing customers into subscribing to unwanted bundled services may reduce participation further in the Lifeline program, unless the benefit amount is increased.

### **Minimizing Reporting Burdens**

The FCC seeks comment on ways to improve program efficiency while reducing regulatory burdens on the Eligible Telecommunications Carriers (ETC’s) participating in Lifeline.<sup>12</sup> Specifically, the FCC is seeking comment regarding the

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<sup>10</sup> MPSC January 23, 2018, Comments to the FCC, p 7, <https://www.fcc.gov/ecfs/document/101231633117042/1>.

<sup>11</sup> MPSC December 8, 2021, Comments to the FCC, p 12, <https://www.fcc.gov/ecfs/document/120853108218/1>.

<sup>12</sup> FCC’s February 23, 2026, Public Notice NPRM, p 28, <https://docs.fcc.gov/public/attachments/FCC-26-8A1.pdf>.

possibility of streamlining FCC Form 481 and FCC Form 555, including combining these forms as well as others and having the same deadline date. The MPSC appreciates the FCC's consideration of ways to improve program efficiency. However, the MPSC would caution the FCC against combining both forms into one. First, the MPSC does not believe that submitting an individual Form 481 and Form 555 is overly burdensome for an ETC Lifeline provider. Second, if these forms were combined, it could cause confusion among providers as to the information that should be provided, and create situations where information is inadvertently not included. Additionally, if part of the combined form is not fully completed or has errors, that could have an adverse effect on the entire form that is submitted. For example, it should be clarified that if a provider properly completes the Form 481 portion of the form, but has excluded some information regarding the Form 555, whether that would mean the entire form would be considered incomplete. This could cause the recertification process to be delayed until everything in the form has been completed. The MPSC believes that by keeping Form 481 and Form 555 separate, it helps to foster communication and interaction with the providers, the state commissions and the FCC. The FCC has expressed its desire to enhance overall Lifeline program integrity and combat waste, fraud, and abuse in this NPRM, and by having continued interaction and communication between the providers the FCC, and the states, it may assist in combating issues regarding waste, fraud, and abuse.<sup>13</sup> Lastly, the MPSC does not believe the FCC should

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<sup>13</sup> FCC's February 23, 2026, Public Notice NPRM, p 5, <https://docs.fcc.gov/public/attachments/FCC-26-8A1.pdf>.

reduce or eliminate any reporting requirements within these forms. These reporting requirements are not only important for the protection of the customer, but also to help safeguard against waste, fraud, and abuse.

### **ETC Compliance Plans**

The FCC seeks comment regarding the “own facilities” requirement and non-facilities-based ETC issues.<sup>14</sup> The MPSC encourages the FCC to revisit its current definition of “own facilities” and to potentially modify that definition to provide further information and guidance as to what constitutes “own facilities,” where those facilities are located, and potential examples of “own facilities”. The MPSC expresses concerns regarding the emergence of more wireless providers attempting to become ETCs. While having multiple ETCs is a benefit to customers, it is important to ensure that these wireless providers are in good-standing and are legitimate and reliable providers. Some wireless providers will claim they have their “own facilities”, but when looking more closely, that term may be used loosely, and they may not have facilities located within the state in which they are seeking to become an ETC, or the actual facility itself is questionable. To help safeguard against bad actors, the MPSC believes it would be beneficial if the FCC reexamined its current definition of facilities and “own facilities” to determine if those definitions can be further clarified or defined.

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<sup>14</sup> FCC’s February 23, 2026, Public Notice NPRM, p 30, <https://docs.fcc.gov/public/attachments/FCC-26-8A1.pdf>.

## Conclusion

The MPSC appreciates the opportunity to provide comments on an important assistance program. The MPSC continues to believe in the importance of voice-only Lifeline. The MPSC also respectfully advocates for the need to increase the Lifeline broadband and bundled services support. Forcing customers into broadband or bundled services without increasing the benefit amount may prohibit customers from subscribing to the service. Requiring customers to obtain a bundled voice and broadband service when a customer may only seek voice service may inevitably increase cost and reduce affordability for Lifeline subscribers, leading to decreased participation in the Lifeline program. The MPSC also suggests proceeding with caution as the FCC contemplates making the Lifeline transferring process more stringent. The MPSC is supportive of the FCC in its efforts to implement certain penalties to help deter providers that do not properly complete the porting request in compliance with the FCC's requirements. Lastly, as the FCC is focused on combating waste, fraud, and abuse regarding Lifeline, the MPSC encourages the FCC to reexamine the "own facilities" and non-facilities-based issue and to consider refreshing or further clarifying the FCC's definitions regarding facilities associated with potential wireless Lifeline ETCs. At the same time, the MPSC would advocate against combining various reporting forms for the ETCs and taking any action to further eliminate reporting requirements by the ETCs.

Respectfully submitted,

**MICHIGAN PUBLIC SERVICE  
COMMISSION**

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