

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)
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Lifeline and Link-Up) WC Docket No. 03-109
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COMMENTS OF THE IOWA UTILITIES BOARD

Introduction

On April 29, 2004, the Federal Communications Commission (FCC) released a Report and Order and Further Notice of Proposed Rulemaking regarding Lifeline and Link-Up, WC Docket No. 03-109. In the Further Notice, the FCC is seeking comment on one topic. That topic is whether the income-based criterion of 135 percent of the federal poverty guidelines (FPG) should be increased to 150 percent of the FPG. On July 25, 2007, the Wireline Competition Bureau issued a notice that it wishes to refresh the record around the issue raised in the earlier Further Notice.

Discussion

The Iowa Utilities Board re-states its support for an increase of the income-based criterion from the 135 percent level to the 150 percent level of the federal poverty guidelines. This is nothing more than treating all low-income consumers in an equitable manner. Currently, in Iowa, consumers who are

eligible for the Low Income Heating Assistance Program (LIHEAP) comprise the majority of the subscribers of the Lifeline/Link-Up program.

Consumers qualifying under the LIHEAP program already have an income-based standard of 150 percent as an eligibility criterion. Increasing the income-based criterion for Lifeline/Link-Up from 135 percent to 150 percent would allow consumers not eligible for LIHEAP due to their homes or apartments including utilities in the rent, to be treated equitably with LIHEAP eligible consumers.

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Respectfully submitted,

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