November 13, 2026

Dear Chairman Cruz:

The National Lifeline Association (NaLA) represents service providers, stakeholders and beneficiaries of the federal Lifeline low-income connectivity support program. NaLA believes that every person should have access to essential communication services. The Lifeline program is intended to make essential voice and broadband services affordable for low-income Americans across the country and in rural and urban areas alike.

NaLA strongly supports protecting the Lifeline program from waste, fraud and abuse. That is why NaLA has supported mandatory use of the National Verifier to determine eligibility for Lifeline benefits by all providers in all states. And it is why NaLA supports S. 3954, The No Lifeline for Dead People Act.

While no database is perfect and the time in which it takes a death to be recognized in such databases will vary, NaLA believes that uniform use of an improved National Verifier will better protect Lifeline than reliance on multiple program administrators.

Preventing the enrollment of dead people in Lifeline, however, requires more than just mandatory use of today's National Verifier. S.3954 should be amended to require the Federal Communications Commission to commence a rulemaking to determine how current National Verifier identity verification processes can be improved so that the National Verifier verifies as alive and eligible fewer dead people and detects deaths among the enrolled Lifeline population in a timelier and more accurate manner. S. 3954 also should be amended to require the FCC to establish these processes by rulemaking and to share death determinations with service providers in real-time. Such collaboration will better enable service providers to identify and isolate problems which will in turn better protect Lifeline and Lifeline service providers from improper payments.

NaLA looks forward to working with you and the Senate Commerce Committee to improve Lifeline and the National Verifier.