



March 21, 2023

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street NE
Washington, D.C. 20554

Dear Chairwoman Rosenworcel,

As the Federal Communications Commission (FCC) takes steps to implement the Safe Connections Act, I write to encourage the Commission to adopt strong rules to protect the privacy of domestic violence survivors and to ensure their access to critical phone and broadband services.

Congress passed the Safe Connections Act in November 2022 to empower survivors of domestic violence, human trafficking, and other related crimes to sever ties with their abusers and disconnect their shared wireless service plans, which can be used to monitor, control, and stalk. The Safe Connections Act also requires the Commission to open a rulemaking on providing survivors with access to subsidized broadband and phone services (Lifeline and Affordable Connectivity Program) and consider requiring phone services to provide privacy protections for calls to domestic violence hotlines and other support services.

Domestic violence is a significant public health and safety issue affecting over 12 million people in the United States every year, which has only been exacerbated by the COVID-19 pandemic.¹ Safe and affordable connectivity is vital for the physical, emotional, and economic well-being of survivors, as well as their ability to maintain critical connections with their friends, family, and social safety networks when establishing independence from their abusers. I appreciate that the FCC's request for comments on these rules recognizes the necessity for survivors of domestic violence to have access to safe, private, and affordable connectivity.

¹ National Domestic Violence Hotline, Domestic Violence Statistics, <https://www.thehotline.org/stakeholders/domestic-violence-statistics/>

As the Commission moves forward on its notice of proposed rulemaking, I urge the Commission to ensure the process is made easy for survivors of domestic violence to access the privacy, safety, and financial protection provided in the bill.² I agree with survivor advocacy and direct service organizations that the Commission should adopt rules that lower barriers to access Lifeline and the Affordable Connectivity Program. Setting the standard of survivor identification to be self-attestation, rather than requiring a third-party to “vouch” abuse and financial difficulties, can enhance survivor agency and access to low-cost phone service programs.³ One of the main methods for abusers to retain control is isolation, which increases the difficulty for a survivor to obtain someone to vouch for their status. Self-attestation minimizes the survivor’s burden, as they may not have access to personal identification or financial documents.

I also support strengthening the FCC’s privacy rules to protect domestic violence survivors that are accessing support resources, such as shelters and assistance hotlines. Often, the path to escaping abuse starts with a phone call to a service like the National Domestic Violence Hotline. However, in abusive households, those calls appearing on phone logs and bills creates threats to the safety and ability of survivors to leave — as well as creating a chilling effect. The Commission should vigorously act to protect that important ability to take the first step and seek assistance. I agree with commenters that the Commission should move forward with requiring phone companies to mask or omit such calls, to create a registry of participating services, and open that registry to as broad set of categories of assistance services possible.

I appreciate the Commission’s consideration of these important protections and hope the FCC will move quickly to support the privacy and lifeline of domestic violence survivors.

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in blue ink that reads "Richard Blumenthal". The signature is fluid and cursive, with the first name "Richard" being the most prominent part.

Richard Blumenthal
United States Senate

² Supporting Survivors of Domestic and Intimate Partner Violence
Notice of Proposed Rulemaking – WC Docket Nos. 22-238, 11-42, 21-450

³ Letter from EPIC and advocacy groups for domestic violence survivors’ connectivity. <https://epic.org/epic-coalition-urge-fcc-to-support-domestic-violence-survivors-in-low-cost-programs/>