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Communities Connect recommendations in Response to Federal Request for Information Regarding The American Recovery and Reinvestment Act of 2009 Broadband Initiatives Docket Number 090309298-9299-01

Communities Connect Network (CCN) is a statewide coalition of public, non-profit and private organizations working to ensure technology opportunities for all.

We represent 200+ organizations in the State of Washington providing technology access and learning opportunities. According to a recent study by the University of Washington, these organizations (CTs) receive more than one million visits per year.

We bring expertise in broadband deployment and adoption, a clearinghouse for research and training, and education about best practices and the needs of digital inclusion programs. Communities Connect Network was instrumental in creating the Washington State Community Technology Opportunity Grant Program and facilitating the awarding of grants for digital inclusion programs. We developed and manage a multi-sector state Digital Inclusion Council. We encourage the NTIA to consider formation of a national digital inclusion council and support these state councils.

We know from experience and research that you can offer valuable online content and applications like medical information or job applications, but if residents can't afford a broadband connection, don't have a working computer, know where to find the content, or how to use the web effectively, then ARRA won't attain its goal of reaching the most vulnerable populations and these residents, small businesses and non-profits will not become sustainable purchasers of broadband services. Our comments here focus on how to use the ARRA funds to link and support increased demand for and adoption of broadband. For instance, low-income residents and seniors will understand how to use broadband after receiving training and could benefit from low-cost computer distribution programs. The disabled need adapted equipment and training to take advantage of broadband. Technology training and web marketing assistance help enable disadvantaged business sustainability and new entrepreneurs...and greater demand for broadband.

Summary of our recommendations:

1. NTIA and RUS should strengthen support for broadband adoption programs that increased demand, going beyond the minimum amounts set in the ARRA for public access and adoption programs. Broadband adoption programs increase user take-rates and support broadband sustainability. This is especially important for rural and low-income communities.

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2. The \$450 million allocated to public computing and the “innovative adoption programs” should be considered the minimum available for these purposes.
3. There should be different definitions and criteria for underserved in adoption programs vs deployment programs. Definitions and proposals focused on speed alone do not address the adoption needs of vulnerable populations in urban and rural settings for broadband application awareness, skills training, end-user hardware and software, and technical support. Community Technology Centers (CTC's) should be eligible and receive funding, in addition to colleges and public libraries, for public access, training and adoption funds,
4. Local and regional programs that regrant to deliver services should be eligible and are an effective way to ensure use of best practices, enable greater reach to underserved populations and to deliver locally responsive community-based initiatives.
5. NTIA and RUS should support capacity building networks which promote best practices and strategic coordination. In Washington State, CCN provides training, program evaluation and other services which would otherwise be unavailable and unaffordable for small to mid-sized CT programs.
6. Affordability in broadband must also be addressed- for residents, non-profit community service providers, and small businesses.

Answers to Questions

1a. Should a certain percentage of grant funds be apportioned to each category?

While infrastructure is essential, the NTIA and states need to ensure that sufficient funds are allocated to demand side programs. We recommend that the \$450 million allocated to public computing and the “innovative adoption program” be considered the minimum available for these purposes. Credit should be given to deployment projects that demonstrate partnerships to address the demand side needs of cost, user equipment, training and technical support..

The \$200 million public access computer centers and the \$250 million for innovative adoption programs should be awarded as distinct programs to ensure addressing their intent and facilitating monitoring and evaluation.

There is also a risk in this program that only the largest companies and institutions will receive funds, leaving out capacity building for smaller non-profit community institutions in rural areas and/or who most directly reach vulnerable populations, and small businesses. This could be addressed in three ways:

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allowing local regranting to reach them, setting aside a portion of funds for small grants, or rewarding proposals that show partnerships with smaller organizations.

1b. Should applicants be encouraged to address more than one purpose?

Yes. Infrastructure deployment projects should be encouraged to also address adoption purposes. For adoption programs, there is an opportunity to link Internet service providers with those providing consumer hardware, software, training and those who produce locally relevant content and applications.

REGRANTING:

The NTIA should allow applications from organizations that will provide regranting for expansion of public access computing and learning programs, and broadband adoption programs. This will enable greater local responsiveness, aggregate purchasing and impact evaluation, sharing of best practices, and coordination to ensure gaps in services are addressed. Proposals to set-up regranting projects should demonstrate:

- expertise in public computing, technology literacy and grantmaking,
- capacity for financial management,
- multi-sector oversight,
- technology expertise
- processes for community participation in grant decision-making, and
- a plan for impact evaluation.

There are relevant models of this in local, state and federal programs related to technology literacy and access.¹

¹ A few examples of successful regranting programs include the City of Seattle Technology Matching Fund, the Washington state Communities Connect Network and Community Technology Opportunity Programs, the City of Austin Grant for Technology Opportunities Programs (GTOPS) and nationally, the America Connects Consortium and CTCNet which were funded under the Department of Education Community Technology Program.

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1c. How should the BTOP leverage or respond to the other broadband-related portions of the Recovery Act, including the United States Department of Agriculture (USDA) grants and loans program as well as the portions of the Recovery Act that address smart grids, health information technology, education, and transportation infrastructure?

Points should be awarded for programs which use broadband and technology literacy training to address the goals and increase the utilization of the services being delivered through the other parts of the Recovery Act.

In particular, BTOP support for the technology learning programs will meet other ARRA goals including: help build workforce and job seeking skills, support small business education, enhance youth development, and increase access to online consumer, legal and health services. ²

6. Grants for Expanding Public Computer Center Capacity

The Communities Connect network urges 1) inclusion of Community Technology Centers and 2) use of regranting programs as an effective means to reach local communities and aggregate best practices, technical support and assistance, and evaluation.

6a. What selection criteria should be applied to ensure the success of this aspect of the program?

They should clearly identify the population to be served, be able to provide a plan for programs to be provided, including training and time available for general public access to essential services (open lab time for employment searches, resume writing, research on health, etc). Criteria should also include a technical plan, staffing plan (which could include volunteers), demonstrated capacity for financial management and technology support, capacity for marketing services, a plan for impact evaluation, appropriate facilities, and community participation in program design. To help reduce the likelihood of redundant services, new public computing sites should be given points for or required to provide letters of support from a government entity, United Way, or other recognized regional services oversight body. Applicants should also be given preference for services

² See University of Washington research at <http://communitiesconnect.wikispaces.com/UWRResearch>

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developed in coordination with already existing institutions serving target populations within their communities (e.g., extending the reach of a community center, public library or multi-service agency through additional services enabled by a broadband connection).

Services should be provided on a non-discriminatory basis. Additional points should be rewarded for programs that actively enable access for people with disabilities.

Public computing sites in popular community locations, such as small businesses, should be eligible if managed by a not-for-profit that meets the criteria described above.

6b. What additional institutions other than community colleges and public libraries should be considered as eligible recipients under this program?

Community Technology Centers (CTC's) should be eligible. They have been previously recognized as important institutions by the Department of Education's Community Technology Program³. Community Technology Programs have also been defined by the State of Washington.⁴

These centers, often in non-profits, affordable housing, or tribal or local community centers, offer Internet access along with a number of other services, often including deployment of free or low-cost computers and software, technical assistance, technology literacy training, and assistance using computers and the Internet effectively (for work and microenterprise, education, health, or meeting basic needs). They are often complementary to other local library and education services, a first step to both broadband use and better family economic opportunity. Research by the University of Washington with the Communities Connect Network determined that these centers received over 1.3 million visits in

³ See US Department of Education Community Technology Programs, 20 U.S.C. 7263–7263b.
<http://edocket.access.gpo.gov/2003/pdf/03-15708.pdf> and <http://vlex.com/vid/sec-uses-funds-19197356>.

⁴ See Chapter 28B.32 RCW - Community technology opportunity program
<http://apps.leg.wa.gov/RCW/default.aspx?cite=28B.32&full=true#28B.32.020>

2007, resulting in significant employment and education benefits for the individuals as well as for their families and communities.⁵

7. Grants for Innovative Programs to Encourage Sustainable Adoption of Broadband Service

7a. What selection criteria should be applied to ensure the success of this program?

Sustainable adoption of broadband will require attention to access (availability), literacy (skills to use) and meaningful content (a reason to use) (See attachment). Selection criteria should favor programs that:

- Address affordability of broadband services and access to end-user equipment and technical support,
- Expand awareness of the benefits of services (help connect users to relevant content), and
- Provide skill development resources (technology literacy activities) in order to use broadband in a meaningful way.
- Can demonstrate how they will show that their services will provide meaningful changes in high need areas such as health care, legal services, education and economic improvement.

Programs that include these criteria will increase user investment in adopting broadband on a sustaining basis. Recognition should also be given to proposals offering partnerships that strengthen the capacity to provide effective, services, especially to those representing hard to reach populations. For instance, community colleges or a public library could partner with smaller non-profits, senior centers, community chambers of commerce, or immigrant/refugee organizations to effectively reach low-income residents and those with little exposure to broadband.

Proposals should also be considered that bundle users with delivery systems to reduce ongoing expenses for broadband, hardware/software and/or technical

⁵ Crandall, M. (2007). "Digital Inclusion in Action: How Washington's community technology nonprofits provide access, literacy and content". Presentation to Washington Senate Water, Energy and Telecommunications Committee. Olympia, WA. November 30, 2007 See <http://communitiesconnect.wikispaces.com/UWRResearch>

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support. For example, this could be wi-fi in low-income housing, shared tech support for CTC's or a computer with a year of free or low-cost broadband for those completing training.

Projects should also be considered that create local content for broadband or enable more effective delivery of broadband education content, such as video conferencing to enable shared instructors or remote training, or youth video projects about their community.

7b. What measures should be used to determine whether such innovative programs have succeeded in creating sustainable adoption of broadband services?

Measures should include:

- Increased rate of adoption in population served, with distinct tracking of connections for low-income and other historically low-technology adopting residents, non-profits and disadvantaged businesses.
- Improvements in organization and/or individual connectivity, hardware ownership, training and/or technical support.
- Increased technology literacy and computer skills, increased awareness of and use of broadband services by program participants. This would include the number served as a measure, though there needs to be some allowance for challenging populations, such as those with disabilities or limited English speakers, who require additional equipment or training time in order to use broadband services.
- Tangible client-level outcomes as appropriate to the project funded, such as increased academic achievement, increased job readiness, earnings increase, or job placement.
- Increased staff skills to provide broadband adoption and technology literacy programs.
- Increased sustainability of local community technology centers.
- Additional project specific measures may include number of refurbished computers provided to families, sustainable technical support capacity

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- Ongoing commitment from providers or other partners of a method to make Internet connections affordable to low income residents, community technology learning centers and non-profit organizations.
- Impact measures demonstrating downstream results of increased broadband use.

8. Broadband mapping

8e. Other mapping programs that provide models:

Consider mapping public technology access and learning sites as well. Washington State has required this in law.⁶ See examples at http://access.wa.gov/education/community_programs.aspx and at <http://www.communitiesconnect.org/network-directory>. This information should be rolled into a national directory, though may be best managed at the state and local level.

9. Financial Contributions by Grant Applicants

The NTIA and RUS should consider various forms of in-kind contributions that applicants may be able to contribute toward the 20 match requirement, such as assigned personnel, and office and administrative overhead. For a community-based non-profit applicant or partner in an application, in-kind contributions of personnel, administrative overhead, donations of hardware or software, and community volunteer time should be counted as a match. The Washington State Community Technology Opportunity Program recognizes these in its grant program as do other programs.

For programs that assist with broadband adoption for low-income families, small businesses in economically depressed areas, and small non-profits, these additional factors should be considered in waiving the 20% for financial need:

- Size of the organizations' budget and staff
- Economic condition of the community in which the organization is located
- Experience serving low-income families

⁶ See RCW 43.105.360; Web directory — Public community technology programs.
<http://apps.leg.wa.gov/RCW/default.aspx?cite=43.105.360>

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13. Definitions:

a. For purposes of the BTOP, how should NTIA, in consultation with the FCC, define the terms “unserved area” and “underserved area?”

There should be a definition for deployment and one for demand/adoption.

For the purposes of adoption programs an underserved area should be defined as:

(a) any census tract that is located in a federally designated empowerment zone, enterprise community, renewal community, or low-income community; (b) a census tract with a significant population (10% or more below poverty level) of economically disadvantaged residents; or (c) an area in which there is a significant disparity where residents are not able to adopt broadband because of disability, affordability of computers or software, or a lack of technological literacy.

An underserved population could also be identified through statistically valid and qualified research by recognized institutions such as the Pew Center for Internet research, universities, or government entities. These definitions recognize that barriers to broadband and solutions may be localized, such as a program targeted at low-income housing projects, disadvantaged non-profits or business districts.

For the purposes of deployment programs:

The NTIA should take a broad approach to defining unserved and underserved in deployment while recognizing the need to deploy new broadband infrastructure to areas that currently have no service at or above 768kbps downstream. An area is also underserved if customers cannot afford broadband. Competitive service and guaranteed speeds should be goals.

Are there other terms in this section of the Recovery Act, such as “community anchor institutions,” that NTIA should define to ensure the success of the grant program? If so, what are those terms and how should those terms be defined, given the stated purposes of the Recovery Act?

e. What role, if any, should retail price play in these definitions?

Affordability is critical for adoption of broadband and should be a factor in considering whether residents, non-profits, and small businesses are served equitably by

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deployment projects. Consumers should have a central web site they can go to find service providers and compare prices and service packages.

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