To: Broadband Opportunity Council, Rural Utilities Service (RUS), and National Telecommunications and Information Administration (NTIA)

Please find attached my comments for submission to the Broadband Opportunity Council, pursuant to the Council's "Notice and Request for Comment" (Docket No. 1540414365–5365–01) dated April 29, 2015.

Thank you.

Bill Callahan, Director
Connect Your Community 2.0
216-870-4736
connectyourcommunity.org

To: Broadband Opportunity Council
        Rural Utilities Service (RUS)
        National Telecommunications and Information Administration (NTIA)
From: Bill Callahan, Director, Connect Your Community 2.0, Cleveland, OH

Re: Docket No. 1540414365–5365–01, Broadband Opportunity Council Notice and Request for Comment

Comments of Bill Callahan, Director, Connect Your Community 2.0

Submitted June 10, 1015

Thank you for the opportunity to contribute to this important deliberation. The organization I represent is a member of the National Digital Inclusion Alliance and supports the comments being submitted today by NDIA Executive Director Angela Siefer. My comments are intended to provide a concrete local perspective on several of NDIA's proposals.

I'm director of a collaborative of organizations in greater Cleveland and Detroit called "Connect Your Community 2.0", or CYC 2.0. Our participants (Attachment 1) are local nonprofits and institutions which share a longstanding commitment to promoting digital literacy and sustainable broadband adoption by low-income residents in our communities, which, as you may know, suffer from some of the nation's highest percentages of households lacking home Internet access of any kind. (See Attachment 2, a chart drawn from the U.S. Census' American Community Survey for 2013.)

Most of CYC 2.0's participants were contractual partners or active participants in the Connect Your Community (CYC) Project, a U.S. Department of Commerce Broadband Technology Opportunities Program Sustainable Broadband Adoption project operated from 2010 to 2013 by Cleveland-based OneCommunity. The CYC Project, which I directed, engaged fifteen community-based nonprofit partners to recruit, train, equip and support new broadband adopters in eight localities in Ohio, Michigan, Kentucky, North Carolina and Florida. The Project exceeded its goal of 26,000 documented "Sustainable Broadband Adopters" including about 23,000 previously unconnected home broadband subscribers, and provided free basic computer training to more than 33,000 individual adult participants in the process. CYC classes were conducted by project staff and volunteers in more than 350 separate community locations. (More information about that Project, including curriculum, local approaches and outcomes, and survey research with graduates can be found at http://connectyourcommunity.org/about-cyc-1-0/.)

The mission of CYC 2.0 is to build on the capacities and expertise of our participants -- especially the capacity, expertise and data created through BTOP's investment in the CYC Project – to develop a locally sustainable model for ongoing, large-scale digital literacy and adoption work serving our low-income neighbors. We believe the key to success in this mission is support from a variety of investment partners that have objective, compelling business reasons to help reduce Internet access barriers for their constituents.

Those prospective investment partners include, among others:
- local hospitals (to support PHR adoption by low income patients and help meet Federal

    meaningful use requirements)
- banks (to help inner-city customers to adapt to online banking, keep them as customers and avoid Community Reinvestment Act problems as branch consolidation pressures mount)
- state, city and county government, which increasingly rely on online tools for managing human services, unemployment and workforce services, tax filings, utility payments, permitting, public safety interactions with citizens, civic information sharing, and numerous other routine functions – tools which are inaccessible to a large proportion of Cleveland and Detroit citizens.

The Commission has asked, under *"D. Promoting Broadband Adoption"*:

16. What federal programs within the Executive Branch should allow the use of funding for broadband adoption, but do not do so now?

17. Typical barriers to broadband adoption include cost, relevance, and training. How can these be addressed by regulatory changes by Executive Branch agencies?

I want to suggest three specific areas in which programmatic or regulatory action by Executive Branch agencies could materially help our efforts to develop local broadband adoption partnerships, on the model described above, in Cleveland and Detroit.

1) Department of Health and Human Services support for healthcare provider/community efforts to help non-connected Medicaid and Medicare households to become "PHR-ready". More than 60% of Cleveland and Detroit households with incomes below $20,000 lack home Internet service of any kind (including mobile), according to the 2013 ACS. The same is true of about 58% of Cleveland residents over the age of 65. Yet the hospital systems and community health centers serving our cities face increasingly challenging "meaningful use" targets for Patient Health Record adoption and use by these patient populations.

CYC 2.0 participants in both Cleveland and Detroit have met with local hospital representatives to explore collaborations on low-income PHR adoption, and Cleveland's Ashbury Senior Computer Community Center is currently conducting a pilot MyChart training program in cooperation with MetroHealth, the county safety-net hospital, and the Center for Health Research and Policy. But these efforts have been hobbled by lack of significant funding possibilities.

A recent article in the Journal of General Internal Medicine[1] addresses this as a national problem and observes: *"From the access and training perspectives, available funds from both federal/state agencies as well as healthcare systems would ensure increased opportunities for more vulnerable patients to be able to use online tools for health management."*.

HHS should take the initiative to identify funding streams (from public dollars, foundations as well as other industry stakeholders like EHR vendors) to begin addressing this problem in the most straightforward way: Support for community digital literacy and adoption programs organized in partnership with providers, and focused on empowering low-income patients to make meaningful use of their providers' Personal Health Record tools.

1 *Courtney R. Lyles and Urmimala Sarkar, "Health Literacy, Vulnerable Patients, and Health Information Technology Use: Where Do We Go from Here?", J Gen Intern Med, 1/15/2015 (published online)*

2) Community Reinvestment Act credit for bank investments in community digital literacy and adoption programs that empower inner-city customers to use online banking.   The mass migration of customers to electronic banking is causing many banks, including some with major neighborhood branch presences in Cleveland and Detroit, to undertake branch consolidations as well as repositioning to traffic-heavy locations like suburban grocery stores. This process may be inevitable, but it leaves the banks vulnerable to the loss of non-connected customers of the closed branches, not to mention Community Reinvestment Act issues. And of course it reduces access to financial services and choices for the affected customers and communities.

We believe there is a common interest between banks and community digital inclusion programs in helping the customers in question, and unconnected community residents in general, to gain broadband access and skills to use online banking tools. The Office of Comptroller of the Currency should encourage this shared interest by allowing banks subject to its regulatory authority to gain credit in their Community Reinvestment Act ratings for investing in training partnerships with digitally underserved communities, and by taking leadership to extend the practice through its coordination with the independent regulatory agencies.

3) Explicit Community Development Block Grant eligibility for community investments in broadband access and digital literacy for low and moderate income households. Almost all local public funding for neighborhood computer literacy and adoption programs in Cleveland has come in the form of small CDBG contracts from City Council "ward allocations". These grants are always too small to have strategic impact because they are categorized as "public service" expenditures that must fit within the city's fixed CDBG public service expenditure "cap", along with numerous competing services priorities like senior programs, community safety programs, etc. Investment in actual access infrastructure (e.g. community wifi meshes) is even more limited.

The Department of Housing and Urban Development could open up significant possibilities for neighborhood-based solutions to Cleveland and Detroit's very severe digital disconnection problem by designating Internet connectivity and digital literacy for low and moderate income residents as an eligible activity category, separate from the capped public services category.

Thank you.

For more information contact:
Bill Callahan, Director
Connect Your Community 2.0
bill@connectyourcommunity.org

Attachment 1: **Connect Your Community 2.0 participating organizations**

Cleveland
Ashbury Senior Computer Community Center
Center for Health Research and Policy
Cleveland Housing Network Community Training Center
Cleveland Community Development Department
Connect Lorain County
Cuyahoga Community College
Cuyahoga County Public Library
OneCommunity
Seeds of Literacy
The Straightway Project

Detroit
Focus:HOPE
Matrix Human Services
Wayne State Center for Urban Studies
Community Telecommunications Network

Attachment 2:

Percentage of households with no Internet access				
72 U.S. cities with 100,000 or more households				
Source: 2013 American Community Survey 1-Year Estimates				
	All households	No Internet access		
		Number of households	% of households	Rank
Median, all 72 cities			21.7%	
20 worst-connected:				
Detroit, MI	255,322	101,923	39.9%	1
Miami, FL	154,556	56,886	36.8%	2
Cleveland, OH	164,400	59,403	36.1%	3
New Orleans, LA	158,354	53,572	33.8%	4
Buffalo, NY	109,511	35,679	32.6%	5
Memphis, TN	250,302	80,922	32.3%	6
St. Louis, MO	140,536	44,815	31.9%	7
Milwaukee, WI	231,386	72,129	31.2%	8
Baltimore, MD	244,114	74,116	30.4%	9
Cincinnati, OH	133,301	40,361	30.3%	10
Toledo, OH	118,526	35,363	29.8%	11
Philadelphia, PA	582,528	173,795	29.8%	12
El Paso, TX	219,332	63,047	28.7%	13
Dallas, TX	476,733	135,640	28.5%	14
Fresno, CA	161,474	43,541	27.0%	15
Wichita, KS	151,213	40,170	26.6%	16
Tulsa, OK	162,992	42,675	26.2%	17
Indianapolis, IN	326,395	84,818	26.0%	18
San Antonio, TX	493,102	124,833	25.3%	19
Chicago, IL	1,030,136	256,481	24.9%	20

Data from 2013 American Community Survey 1-Year Estimates, Table B28002: Presence and types of Internet subscriptions in household