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To: [BOCrfc2015](#)
Subject: National Digital Inclusion Alliance comments attached
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Attachments: [NDIA Comments to Broadband Opportunities Council.pdf](#)

The comments of the National Digital Inclusion Alliance are attached. Thank you!

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June 10, 2015

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Attn: Broadband Opportunity Council

**Comments of the
National Digital Inclusion Alliance
to the Broadband Opportunity Council**

(sent by e-mail to BOCrfc2015@ntia.doc.gov.)

The National Digital Inclusion Alliance submits these comments in response to the Broadband Opportunity Council's Notice and Request for comments issued on April 29, 2015. The National Digital Inclusion Alliance represents leaders of local community organizations, public libraries, towns and other institutions that are working hard to reduce digital disparities among our neighbors. A membership listed is included as an appendix. We are experts in technology adoption and digital inclusion programs, including local technology training, home broadband access and public broadband access programs.

We commend President Obama and the Administration for establishing the new Broadband Opportunity Council ("Council") and engaging the breadth of federal agencies to focus on accelerating broadband deployment and adoption across the country, including the capacity to use online government services.

Free and low-cost broadband options are critical tools in our efforts to increase digital equality in the United States. We are looking forward to the reform and modernization of Lifeline as one opportunity to strengthen the broadband options for vulnerable residents by addressing the broadband adoption barrier of cost.

Through our experience and research¹ we have found that that broadband adoption is most effectively promoted by community-driven efforts that combine:

- Affordable home broadband service,
- Public broadband access, and
- Locally-trusted technology training and support.

We strongly encourage the Council to consider reviewing the lessons learned from broadband adoption programs delivered alongside access efforts, such as the NTIA BTOP program did in a limited, but very important way with infrastructure, public access and adoption programs.

We offer the following specific suggestions of how the federal agencies can help increase broadband adoption in the United States.

Question 1: How can the federal government promote best practices in broadband deployment and adoption? What resources are most useful to communities? What actions would be most helpful to communities seeking to improve broadband availability and use?

2. How can the federal government best promote the coordination and use of federally-funded broadband assets?

Coordinate and promote public access computer centers (public broadband site mapping): This would assist federal and local referrals and planning. This is also useful for disaster preparedness planning and response. The only current national one is operated by Everyone On, with primarily the library database and some additional sites. This is a small sample of those serving local communities. Other federal agencies, with local assistance, could assist with this.

Support expansion of the database and portals that share best practices and program resource materials: The NTIA has done valuable work building the toolkits and collecting program and evaluation materials. This should be expanded and maintained, with all federal programs contributing and with management support for curation and local input. The utility of DigitalLiteracy.gov could be strengthened by allowing broadband adoption practitioners to download and revise resources, upload revised or new resources and also rate the usefulness of the resources. A distributed library system that allows local posting with search or library aggregation should be considered. (The City of Seattle and the University of Washington are piloting a model). Digital Literacy.gov uses a taxonomy developed

¹ This point has been reiterated in [John Horrigan's evaluation of Comcast's Internet Essentials](#), an [independent review of CenturyLink's Internet Basics Program](#), the [Wireline Competition Bureau Low-Income Broadband Pilot Program Staff Report](#) and a myriad of documentation of the National Telecommunication Information Administration's Broadband Technology Opportunities Program (BTOP), particularly the [NTIA Broadband Adoption Toolkit](#).

initially by some of our members, in partnership with local organizations, universities and government. Promotion and application of a national taxonomy would aid search, cataloging and updating.

4. As the federal government transitions to delivering more services online, what should government do to provide information and training to those who have not adopted broadband? What should the federal government do to make reasonable accommodations to those without access to broadband?

Broadband Linked Investment: Online government services require broadband access and digital skills. Moving government services online can result in significant savings for these government agencies. We as a country must ensure all of our neighbors have access to government online services. All federal departments with an online presence and/or establishing new services should invest in ensuring end users can access the services effectively. Departments should be able to demonstrate how they are aiding non-connected users to increase digital skills, gain home access or utilize a convenient public access location.

Support personal health record access for low-income patients: As part of its continuing advocacy and investment in Electronic Health Records adoption (EHR), the Department of Health and Human Services should develop a funding stream for hospital/community partnerships to make electronic patient health record tools accessible to Medicaid/Medicare households that lack home broadband and/or the necessary digital skills, through training and broadband adoption support. The Office of the National Coordinator should work to directly include health literacy and language in their future Meaningful Use standards for patient engagement with online portal websites.²

Ensure people can find local resources and information ambassadors to help with online federal content: Education about public access sites, training and assistance is critical as we saw with the health care plan rollout and the use of local information intermediaries. This requires a system of mapping local technology access and training sites greater than exists currently. We would be happy to help guide such an effort.

Require agencies to assess the impact before they launch online services, as part of the technology project management: One tool to consider for application is the City of Seattle Race and Social Justice IT Project Management Tool.

² Courtney Lyles and Urmimala Sarkar accurately describe the challenges of low-income seniors and existing research on low-income senior use of health information and online portal websites. "Health literacy, vulnerable patients, and health information technology use: where do we go from here?", *Journal of General Internal Medicine*, Vol 30 Issue 3, (March 2015) p. 271-272,

5. How can the federal government best collaborate with stakeholders (state, local, and tribal governments, philanthropic entities, industry, trade associations, consumer organizations, etc.) to promote broadband adoption and deployment?

Bring together stakeholders to highlight successful programs, exchange best practices, articulate metrics and coordinate resource investments. We

recommend doing this in three ways:

- a) Establish a Federal Digital Inclusion Council along with state or regional sub-councils. This would help forge diverse partnerships, local solutions, and feed communications about best solutions to and from the White House and agencies.
- b) Support regional and national digital inclusion summits to disseminate information and engage more local stakeholders.
- c) Create national broadband access and adoption awards, like the Kennedy Center honors, or United Kingdom national awards, to recognize private, public, non-profit and outstanding local volunteers and solutions.

7. What federal programs should allow the use of funding for the deployment of broadband infrastructure or promotion of broadband adoption but do not do so now?

Existing funding programs should encourage partnerships with smaller community-based organizations: This was done for the Department of Education community technology grant and enables greater use of local information ambassadors.

Provide a portal for all broadband adoption funding opportunities: This is essential to community practitioners finding resources who don't always know a program is eligible for broadband adoption and digital literacy related programs.

Link in-school, out-of-school, and workforce training systems to improve pathways to digital literacy and meeting technology workforce needs:

The Department of Commerce, Labor and Education have pivotal roles in guiding broadband adoption and development. We suggest that they lead a coordinated effort and funding to:

- a) Encourage and educate about the application of technology skills to various careers and required education pathways.
- b) Review workforce development definitions to ensure they accurately represent the digital skills necessary for employment.
- c) Promote grant applications that demonstrate linked programs in communities.

8. What inconsistencies exist in federal interpretation and application of procedures, requirements, and policies by Executive Branch agencies related to broadband deployment and/or adoption, and how could these be reconciled? One example is the variance in broadband speed definitions.

Define broadband adoption: If the Executive Branch were to define broadband adoption both the public and private sectors would have an important tool to increase meaningful use of the Internet.

14. What changes in Executive Branch agency regulations or program requirements would improve coordination of federal programs that help communities leverage the economic benefits offered by broadband?

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?

Make it clearer that federal funding streams and programs can be used for broadband access and adoption efforts. For example:

Community Development Block Grant: HUD should make broadband access and digital literacy training for low/moderate income communities an explicitly eligible use of Community Development Block Grant funds. Broadband access and training investments should no longer be lumped into the “public services” category where they are constrained (and often blocked) by the public service “cap”.

Public and subsidized low-income housing funds : Self-sufficiency funds, credits and other mechanisms should explicitly promote and support broadband access and adoption. The HUD definition of allowable utilities should also be modernized to include Internet service.

The Corporation for National and Community Service (CNCS) should add a Broadband Adoption focus area: Either through an additional focus area or inclusion of broadband adoption within the definitions of existing focus areas would encourage CNCS applicants to create broadband adoption programs or integrate broadband adoption components into other programs.

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

A pipeline to provide retired Federal agency computer systems to qualified local nonprofit or school refurbishing programs: All Agencies should establish a system for retired technology redistribution to disadvantaged households in connection with community broadband adoption initiatives.

Extend Community Reinvestment Act credit for bank investments in neighborhood broadband adoption and training partnerships: The Treasury Department and Office of Comptroller of the Currency, working in coordination with the other Federal bank regulatory agencies, should act in order to ensure that

low/moderate income residents will have access to online banking options as customer migration to the Web leads to branch consolidation.

E. Issues Related to State, Local, and Tribal Governments

18. What barriers exist at the state, local, and/or tribal level to broadband deployment and adoption? How can the federal government work with and incentivize state, local, and tribal governments to remove these barriers?

Modernize state workforce definitions to include digital skills: Encourage each state to insure that basic computer literacy training is a funded resource for all clients of workforce and adult education programs.

State support of broadband adoption when states mandate use of online resources: Insure that state initiatives which mandate client use of online resources (including unemployment compensation, workforce and adult training programs) are supported by adequate Internet access resources, including funded digital literacy training, for clients who need them.

19. What federal barriers do state, local, and tribal governments confront as they seek to promote broadband deployment and adoption in their communities?

20. What can the federal government do to make it easier for state, local, and tribal governments or organizations to access funding for broadband?

21. How can the federal government support state, local, and tribal efforts to promote and/or invest in broadband networks and promote broadband adoption? For example, what type of capacity-building or technical assistance is needed?

Support national reinvestment to enable local solutions: Consider stronger mechanisms to enable reinvestment of Information & Communications Technology revenues into helping vulnerable residents. This could include sources such as spectrum sales, merger settlements, revenue from cell towers on federal property and educating the judiciary that an option for case settlement is supporting consumer education, including public access computer programs and digital skills training on consumer safety and how to utilize online resources.

Support expertise and networking: Continue support for the NTIA's Broadband USA and associated staff, education webinars and work in regions across the country. Continuity and depth of expertise to help connect local communities to resources is very valuable. Enabling networks like the NDIA also supports the federal goals.

Other solutions discussed in this document include the directories of best practices and tools, local public computing/broadband directories, and supporting a system of broadband adoption/digital inclusion councils.

F. Issues Related to Vulnerable Communities and Communities With Limited or No Broadband

22. How can specific regulatory policies within the Executive Branch agencies be altered to remove or reduce barriers that prevent vulnerable populations from accessing and using broadband technologies? Vulnerable populations might include, but are not limited to, veterans, seniors, minorities, people with disabilities, at-risk youth, low-income individuals and families, and the unemployed.

23. How can the federal government make broadband technologies more available and relevant for vulnerable populations?

Help residents understand their choices: Create Internet customer information standards that make it easier for consumers to understand and compare Internet service plans and rates. Ensure that deposits, equipment rental, fees, expiration date of limited time offers, speeds and data caps are included in plain language.

H. Measuring Broadband Availability, Adoption, and Speeds

27. What information about existing broadband services should the Executive Branch collect to inform decisions about broadband investment, deployment, and adoption? How often should this information be updated?

28. Are there gaps in the level or reliability of broadband-related information gathered by other entities that need to be filled by Executive Branch data collection efforts?

29. What additional research should the government conduct to promote broadband deployment, adoption, and competition?

30. How might the federal government encourage innovation in broadband deployment, adoption, and competition?

Establish a Broadband Adoption Corps: As recommended by the National Broadband Plan, implement a National Broadband Adoption Corps. Multi-agency funding could be leveraged with private and local support for this digital literacy and adoption initiative. This would also aid in locally responsive outreach regarding free and low income Internet options and assist in local planning efforts. The Minnesota community technology VISTA programs serves as an example that could be built on.

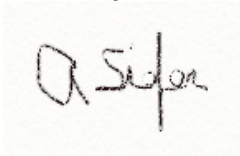
Pilot aggregated Internet purchasing for non-profit organizations: The non-profit community service sector assists many residents with federal, state, local and tribal programs, and is itself a technology disadvantaged sector. The federal agencies could take action to assist with their broadband capacity and one strategy would be to reduce their costs through aggregated purchases of service or through

subsidized connectivity for those that provide broadband adoption assistance to vulnerable communities.

Promote sharing of connections to lower costs: Encourage public and private owned broadband networks to revise their Terms of Service to allow sharing of residential connections in low-income neighborhoods.

Thank you for the opportunity to submit these comments. If there are any questions please contact me at (614) 537-3057.

Sincerely,

A handwritten signature in black ink on a light-colored background. The signature reads "A Siefer" in a cursive, slightly slanted script.

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Appendix
National Digital Inclusion Alliance Membership

Access Humboldt	Eureka, CA
African Immigrant Services (AIS)	Minneapolis, MN
Alpro Solutions	New York, NY
Ashbury Senior Computer Community Center	Cleveland, OH
Austin Free-Net	Austin, TX
Axiom Technologies	Machias, ME
Benton Foundation	Evanston, IL
Brown Paper Tickets	Seattle, WA
City of Kansas City	Kansas City, MO
City of Milwaukee	Milwaukee, WI
City of Minneapolis	Minneapolis, MN
City of Portland	Portland, OR
City of Seattle	Seattle, WA
CL Design	Bellevue, WA
Cleveland Housing Network	Cleveland, OH
Code for Community	Seattle, WA
Community Technology Empowerment Project	St. Paul, MN
Community Technology Network	San Francisco, CA
Compukidz	Seattle, WA
Connect Your Community 2.0	Cleveland, OH
Connect.DC	Washington, DC
Connecting For Good	Kansas City, MO
Digi-Bridge	Charlotte, NC
E2D, Inc	Charlotte, NC
El Paso Public Library	El Paso, TX
Focus: HOPE	Detroit, MI
Free Geek	Portland, OR
Georgia Technology Authority	Atlanta, GA
Gigabit Libraries Network	Sausalito, CA
IBSA, Inc.	Tokeka, KS
InnovateEDU	New York, NY
Jump Wireless	Williamsport, PA
Kansas City Public Library	Kansas City, MO
KC Digital Drive	Kansas City, MO
Literacy, Language and Technology Research Group, Portland State University	Portland, OR
Manchester Community Technologies, Inc.	Inglewood, CA
Matrix Human Services	Detroit, MI
Media Alliance	San Francisco, CA
Minnesota Office of Broadband Development	St. Paul, MN
Mission West Virginia, Inc.	Hurricane, WV
Mobile Beacon	Johnston, RI
Mobile Citizen	Boulder, CO

Mount Hood Cable Regulatory Commission	Portland, OR
Multicultural Media, Telecom and Internet Council	Washington, DC
New Orleans Public Library	New Orleans, LA
Nonprofit Technology Resources	Philadelphia, PA
NTEN Nonprofit Technology Network	Portland OR
Older Adults Technology Services	New York, NY
OpenOakland	Oakland, CA
Partners Bridging the Digital Divide	Warrenville, IL
PCs for People	St. Paul, MN
Philadelphia OIC	Philadelphia, PA
Planulus, Inc.	Spokane, WA
PowerofUS	Washington, DC
Project Appleseed	St. Louis, MO
Puerto Rican Cultural Center	Chicago, IL
Queens Library	New York, NY
Rhode Island Adult Education Professional Development Center	Warwick, RI
Rhode Island Family Literacy Initiative	Providence, RI
Salt Lake City Corporation	Salt Lake City, UT
SHLB Coalition	Washington, DC
Silicon Harlem	New York, NY
St. Anthony Foundation Tenderloin Technology Lab	San Francisco, CA
Tech Goes Home	Boston, MA
Technology & Social Change Group, University of Washington	Seattle, WA
Technology For All	Houston, TX
TeleDimensions, Inc	South Dennis, MA
University Settlement	Cleveland, OH
WinstonNet	Winston-Salem, NC
World Education, Inc.	Boston, MA
Youth Policy Institute	Los Angeles, CA