

**From:** [Michael Scurato](#)  
**To:** [BOCrfc2015](#)  
**Subject:** Comments of the National Hispanic Media Coalition  
**Date:** Wednesday, June 10, 2015 7:57:46 PM  
**Attachments:** [NHMC BOC Comment-FINAL.pdf](#)

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To Whom It May Concern:

Please accept these comments filed on behalf of the National Hispanic Media Coalition and add them to the public record. If you have any questions, please contact me. Thank you.

Best,  
Michael



June 10, 2015

**VIA E-MAIL**

Broadband Opportunity Council  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue, NW, Room 4626  
Washington, DC 20230  
[BOCrfc2015@ntia.doc.gov](mailto:BOCrfc2015@ntia.doc.gov)

**Re: *Broadband Opportunity Council Notice and Request for Comment:  
Department of Commerce, NTIA, Docket No. 1540414365-5368-01;  
Department Of Agriculture, Rural Utilities Service, RIN 0660-XC019.***

Dear Members of the Broadband Opportunity Council:

The National Hispanic Media Coalition (“NHMC”)<sup>1</sup> respectfully submits these comments in response to the Broadband Opportunity Council’s (“BOC”) Request for Comments (“RFC”) seeking stakeholder input about ways the government can support the needs of communities seeking to expand broadband adoption and access; about regulatory barriers unduly impeding broadband deployment, adoption, or competition; about how existing programs can be modified to support broadband competition, deployment, or adoption; and about actions to remove the barriers and realign existing programs to increase broadband competition, deployment, and adoption.<sup>2</sup>

While NHMC cares deeply about greater Executive Branch agency involvement in each of the categories listed in the notice – competition, deployment, and adoption – these comments focus on adoption. NHMC believes that executive branch agencies, given the breadth of their work and the number of direct interactions that they have with constituents, can and should play a much greater role in ensuring that each person in this country is able to easily access the Internet. Indeed, as stated in the Presidential Memorandum launching the Council,

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<sup>1</sup> NHMC is a 29-year-old media advocacy and civil rights organization for the advancement of Latinos, working towards a media that is fair and inclusive of Latinos, and towards universal, affordable, and open access to communications. NHMC is dedicated to ensuring Latinos and other people of color not only have access to broadband, but are able to adopt it as well.

<sup>2</sup> Dep’t. of Ag., Rural Utilities Service, Dept. of Commerce, Nat’l Telecomm. & Info. Admin., Docket No. 1540414365–5365–01, Broadband Opportunity Council Notice and Request for Comment, 80 Fed. Reg. 23785 (April 29, 2015), *available at* [http://www.ntia.doc.gov/files/ntia/publications/fr\\_boc\\_notice\\_and\\_rfc\\_4-29-15.pdf](http://www.ntia.doc.gov/files/ntia/publications/fr_boc_notice_and_rfc_4-29-15.pdf) (“RFC”).

“Access to high-speed broadband is no longer a luxury; it is a necessity for American families, businesses, and consumers.”<sup>3</sup>

As this Council is well aware, access to broadband is increasingly being taken for granted as more essential services move onto the Internet. The use of the Internet to disseminate information and deliver services by both the public and private sector is a good thing. It allows for increased efficiency and often saves time and money for all involved, freeing up resources to achieve other goals. However, we must note that those without ready access to broadband will not be able to partake in this progress. Efficiencies and savings, no matter how great, should not be realized at the expense of leaving segments of our population in the digital darkness, unable to access modern platforms as traditional methods like toll-free telephone numbers and brick-and-mortar locations become increasingly unavailable.

While it is in the best interest of the private sector to support efforts to achieve universal broadband access and adoption in this country, as each new broadband user is a potential customer, it is the *responsibility* of the public sector, to include all Executive Branch agencies that utilize online platforms, to make efforts to ensure that their outreach is effective and those they serve are online.

NHMC is encouraged by the President’s recognition of this reality and is hopeful that this process, at the very least, highlights for all executive branch agencies that achieving universal broadband access and adoption should be near the top of their priorities.

### **The digital divide is real and persistent**

While home broadband adoption rates have improved since broadband service was first offered as a retail product, the adoption rate still lags among certain segments of the population. Nearly half of Latinos (47%) and almost one-third (30%) of the general population do not have broadband at home.<sup>4</sup> The adoption rate is even more dismal in Spanish-dominant households where just 38% have broadband.<sup>5</sup> Others who are more likely to lack home broadband include the poor, African Americans, Native Americans, rural residents, and seniors.<sup>6</sup>

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<sup>3</sup> Presidential Memorandum on Expanding Broadband Deployment and Adoption by Addressing Regulatory Barriers and Encouraging Investment and Training (Mar. 23, 2015), available at <https://www.whitehouse.gov/the-press-office/2015/03/23/presidential-memorandum-expanding-broadband-deployment-and-adoption-addr>.

<sup>4</sup> Aaron Smith and Kathryn Zickuhr, *Home Broadband 2013: Trends and demographic differences in home broadband adoption*, Pew Research Center (Aug. 26, 2013), available at <http://www.pewinternet.org/2013/08/26/home-broadband-2013/>.

<sup>5</sup> Lee Rainie, Director, Pew Internet and American Life Project, Presentation at Washington Post Live 2013 Bridging the Digital Divide forum (Nov. 5, 2013), available at <http://www.pewinternet.org/Presentations/2013/Nov/The-State-of-Digital-Divides.aspx>.

<sup>6</sup> *Id.*

This digital divide threatens to remain cemented in place as overall broadband adoption has lagged considerably in recent years – a fact that is possibly attributed to a multitude of factors including a lack of federal policy solutions and ever-escalating broadband prices. According to one researcher from the Pew Research Center’s Internet Project, “[a]fter increasing by an average of nearly seven percentage points per year from 2000 through 2009, the national broadband adoption level increased by a total of just seven percentage points from 2009 through 2013.”<sup>7</sup>

Perhaps even more troubling and indicative of the lack of urgency to address this issue in recent years: the latest data indicates that the broadband adoption rate actually posted a slight decline among lower-income communities.<sup>8</sup> Fewer than half of households earning less than \$25,000 have broadband at home.<sup>9</sup>

### **Broadband access and adoption drives positive social and economic outcomes**

A few years ago, the Federal Communications Commission’s (“FCC”) Broadband Adoption Taskforce defined the digital divide that exists between those that have broadband and those that do not as an “opportunity divide” that manifests itself in a number of ways.<sup>10</sup> The Taskforce found that broadband adoption was increasingly important across different sectors of our economy and society. For instance, more than 80% of Fortune 500 companies, including huge employers like Wal-Mart and Target, only accept job applications online.<sup>11</sup> In the next decade, nearly 80% of jobs will require some digital literacy skills.<sup>12</sup> Students with broadband at home graduate at a higher rate than students who lack such access.<sup>13</sup> Consumers with broadband at home can save up to \$7,000 per year on goods and services,

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<sup>7</sup> *Broadband Adoption: The Next Mile Before the Subcomm. On Commc’ns., Tech., and the Internet of the S. Comm. On Commerce, Sci., and Transp.*, 113<sup>th</sup> Cong. 1 (2013) (statement of Aaron Smith, Senior Researcher, Pew Research Center’s Internet Project), *available at* [http://www.commerce.senate.gov/public/?a=Files.Serve&File\\_id=8919d402-a852-4246-916e-de623778e7e5](http://www.commerce.senate.gov/public/?a=Files.Serve&File_id=8919d402-a852-4246-916e-de623778e7e5) (“Smith Testimony”).

<sup>8</sup> *Id.* at 16 (reporting based on 2012 Census data that 48% of households earning less than \$25,000 use broadband at home); *Computer and Internet Use in the United States: 2013*, American Community Survey Reports at 3 (Nov. 2014), *available at* <http://www.census.gov/history/pdf/2013computeruse.pdf> (reporting based on 2013 Census data that 47.2% of households earning less than \$25,000 have high speed Internet access at home, down from 48% in 2012).

<sup>9</sup> Smith Testimony at 16.

<sup>10</sup> FCC Broadband Adoption Taskforce, *Broadband Adoption Presentation to FCC Open Meeting*, at slide 4-5 (Nov. 30. 2011), *available at* [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-311281A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-311281A1.pdf) (“Broadband Adoption Taskforce Presentation”).

<sup>11</sup> *Id.* at slide 10.

<sup>12</sup> *Id.* at slide 11.

<sup>13</sup> *Id.* at slide 14.

and annual revenues of small businesses with broadband access are, on average, \$200,000 higher than those without broadband.<sup>14</sup>

A recently-released study of communities that received funding through the Broadband Technology Opportunities Program (BTOP) found communities that received funding increased access to broadband by 2%, which is predicted to generate between \$5.17 billion and \$21 billion in increased annual economic activity for those communities.<sup>15</sup> Receiving broadband infrastructure grants results in noticeable economic growth, job creation, and income increases, as well as faster broadband speeds at more competitive prices.<sup>16</sup> For example, communities that received BTOP infrastructure grants are projected “to create more than 22,000 long-term jobs and generate more than \$1 billion in additional household income each year.”<sup>17</sup>

Other recent research shows that broadband adoption rates, not the availability of broadband alone, drives local economies of rural communities.<sup>18</sup> Researchers analyzed county-level data to compare non-metro areas in terms of broadband availability, adoption and economic growth between 2001 and 2010. They found that rural counties that reached or exceeded a broadband adoption rate of 60% experienced greater income growth and less growth in unemployment.<sup>19</sup> Those where household broadband adoption was less than 40% exhibited lower growth in the number of businesses and total number of jobs. Broadband adoption is the key to continuing to improve the health of our economy.

For the 5 million households with school-age children that do not have broadband, the Internet is an inaccessible school supply required to complete homework assignments and study for tests.<sup>20</sup> Only one in three households have broadband access, yet seven in ten teachers assign homework that requires it.<sup>21</sup>

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<sup>14</sup> *Id.* at slide 19.

<sup>15</sup> Juliana Gruenwald, “Research Study Shows NTIA Broadband Grants Provided Billions in Economic Benefits,” Nat’l Telecomm. & Info. Admin. (Jan. 2014), *available at* <http://www.ntia.doc.gov/press-release/2015/research-study-shows-ntia-broadband-grants-provided-billions-economic-benefits>.

<sup>16</sup> “BTOP Evaluation Study,” Nat’l. Telecomm. & Info. Admin. (accessed June 10, 2015), *available at* <http://www2.ntia.doc.gov/Broadband-Resources#evaluation>.

<sup>17</sup> *Id.*

<sup>18</sup> Econ. Research Serv./USDA, *Broadband Internet’s Value for Rural America*, ERR-78 at 15 (Aug. 2009), *available at* [http://www.ers.usda.gov/media/155154/err78\\_1\\_.pdf](http://www.ers.usda.gov/media/155154/err78_1_.pdf).

<sup>19</sup> *Rural economies benefit from broadband*, Nat’l Agric. & Rural Dev. Policy Ctr. (Aug. 5, 2014), *available at* <http://www.nardep.info/BenefitsBroadband8.html>.

<sup>20</sup> John B. Horrigan, “The numbers behind the broadband ‘homework gap,’” Pew Research Center Fact Tank (April 20, 2015) *available at* <http://www.pewresearch.org/fact-tank/2015/04/20/the-numbers-behind-the-broadband-homework-gap/>.

<sup>21</sup> *Remarks of Commissioner Jessica Rosenworcel*, Taking the Pulse of the High School Student Experience in America, Hispanic Heritage Foundation, Washington, DC (April 29, 2015),

A recent survey by the Hispanic Heritage Foundation and the Family Online Safety Institute revealed that nearly 100% of high school students say they are required to access the Internet to complete homework assignments outside of school.<sup>22</sup> Nearly 50% reported that they have been unable to complete a homework assignment because they did not have access to the Internet or a computer, and 42% say they received a lower grade on an assignment because of lack of Internet access.<sup>23</sup> Pew research shows that half of teachers in low-income communities say their students' lack of home broadband access has been a barrier to integrating technology into their lessons.<sup>24</sup> Failure to address disparities in home broadband access among our students threatens to significantly harm an entire generation and negatively impact our economy and workforce.

### **Government administration benefits from increased broadband adoption**

In addition to creating economic growth, the ability to move information and services online could save the government a tremendous amount of money. The experience in Great Britain is instructive. When Great Britain, a government that has 650 services and conducts more than a billion transactions with citizens annually, implemented a digital strategy in 2012 to move common transactions online, it projected savings of £1.7 billion annually.<sup>25</sup> Moving government transactions online avoids about 150 million phone calls made to government services.<sup>26</sup> Further, Great Britain found "[o]nline transactions can be 20 times cheaper than by phone, 30 times cheaper than face-to-face, and up to 50 times cheaper than by post."<sup>27</sup>

State governments in the U.S. are discovering that online tools offer similar savings and opportunities for efficiency. A 2012 study by the Center for Public Policy & Administration at the University of Utah found "eGovernment," "the process of delivering information and processing government transactions digitally through web, phone, mobile, and point-of-

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*available at* [https://apps.fcc.gov/edocs\\_public/attachmatch/DOC-333274A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/DOC-333274A1.pdf) ("Remarks of Comr. Rosenworcel").

<sup>22</sup> Hispanic Heritage Foundation and Family Online Safety Institute, *Taking the Pulse of the High School Student Experience in America* (April 28, 2015), *available at* <http://www.hispanicheritage.org/hispanic-heritage-foundation-mycollegeoptions-family-online-safety-institute-and-other-partners-announce-findings-of-new-study-titled-taking-the-pulse-of-the-high-school-student-experience/>.

<sup>23</sup> *Id.*

<sup>24</sup> Remarks of Comr. Rosenworcel.

<sup>25</sup> Charles Arthur, "Government services go 'digital by default' to save almost £3bn," *The Guardian* (Nov. 6, 2012), *available at* <http://www.theguardian.com/technology/2012/nov/06/government-services-digital-default-save>.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

purchase channels,” saved Utah \$61 million dollars over a 5-year period.<sup>28</sup> There, each face-to-face transaction costs about \$17.11, but is just \$3.91 when conducted online, saving \$13.20 per transaction.<sup>29</sup>

Moving government benefits and services online also saves time and money for consumers. The Department of Veterans Affairs (“VA”) is an example of a one-stop experience for veterans to access available benefits, streamlining the application processes for the 21.8 million veterans in the United States.<sup>30</sup> The VA benefits navigator promises it will find all programs and benefits a veteran is eligible for in just 20 minutes.<sup>31</sup> Additionally, the “Explore Benefits” page offers specific information about disability compensation, education and training, employment services, health care, home loans, life insurance, memorial benefits, pensions, and benefits for spouses, dependents, and survivors.<sup>32</sup> The Department also has an “Outreach and Social Sharing Portal” with modern infographics, video testimonials, and sample messaging with unique hashtags for vets to text or tweet about their benefits.<sup>33</sup> In addition to relying on social media to drive vets in search of benefits online, the VA hosts workshops for vets returning from deployment, teaching them about the site and encouraging them to look online for assistance first.

Vets are not the only ones benefiting from online service portals. All citizens can learn about and apply for services and benefits ranging from health and education to housing and finances on [benefits.gov](http://benefits.gov). The portal offers links to benefits by category or by state and also includes a benefit finder that produces a list of possible benefits a respondent might be eligible for based on an online questionnaire.<sup>34</sup>

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<sup>28</sup> Center for Public Policy & Administration, “Smarter eGovernment: The Economics of Online Services in Utah,” The Univ. of Utah at 1 (2012), *available at* [http://cdn.nextgov.com/media/gbc/docs/pdfs\\_edit/110112jm1.pdf](http://cdn.nextgov.com/media/gbc/docs/pdfs_edit/110112jm1.pdf) (“Utah Report”); *see also* Joseph Marks, “States Save Money with Online Services,” Nextgov (Nov. 1, 2012), *available at* <http://www.nextgov.com/cio-briefing/2012/11/states-save-money-online-services/59214/>.

<sup>29</sup> Utah Report at 1.

<sup>30</sup> Tom Risen, “Veterans Day Data Boot Camp,” U.S. News & World Report (Nov. 10, 2014), *available at* <http://www.usnews.com/news/blogs/data-mine/2014/11/10/veterans-day-data-boot-camp>.

<sup>31</sup> VA Benefits Navigator, U.S. Dept. of Vet. Affairs (accessed June 10, 2015), *available at* <http://explore.va.gov/benefits-navigator>.

<sup>32</sup> Explore VA: Learn about VA benefits you may be eligible for, U.S. Dept. of Vet. Affairs (accessed June 10, 2015), *available at* <http://explore.va.gov/>.

<sup>33</sup> Outreach & Social Sharing Portal, U.S. Dept. of Vet. Affairs (accessed June 10, 2015), *available at* <http://explore.va.gov/outreach-sharing>.

<sup>34</sup> Benefit Finder, Core Questions (accessed June 10, 2015), *available at* [http://www.benefits.gov/benefits/benefit-finder#benefits&qc=cat\\_1](http://www.benefits.gov/benefits/benefit-finder#benefits&qc=cat_1).

## **Cost is a significant barrier to broadband adoption**

Experts have identified a number of barriers to adoption including affordability, digital literacy, and relevance. According to available data, affordability is the key driver of adoption decisions for a larger number of non-adopters. For instance, Latinos cite cost as the number one reason for non-adoption, with 41% of Latinos citing financial challenges as a barrier to broadband.<sup>35</sup> For people under 65, the primary reason cited for non-adoption is also cost.<sup>36</sup> Further, data shows that, for lower-income rural households where broadband is available, affordability is the main barrier to adoption.<sup>37</sup> For families that cancel broadband service, a segment that is particularly important as low-income adoption rates decline, cost is overwhelmingly the reason why.<sup>38</sup> Fifteen percent of U.S. adults use the Internet but lack access at home.<sup>39</sup> Forty-two percent of this group cites affordability issues as the main barrier to adopting broadband.<sup>40</sup>

This is not surprising as Americans pay more for high-speed Internet than citizens abroad.<sup>41</sup> Consumers in Seoul, Hong Kong, Tokyo, Zurich, Bucharest and Paris pay as little as \$30 a

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<sup>35</sup> Dep't of Commerce, Nat'l Telecomm. & Info. Admin., *Exploring the Digital Nation: Embracing the Mobile Internet* at 15 (Oct. 2014), available at [http://www.ntia.doc.gov/files/ntia/publications/exploring\\_the\\_digital\\_nation\\_embracing\\_the\\_mobile\\_internet\\_10162014.pdf](http://www.ntia.doc.gov/files/ntia/publications/exploring_the_digital_nation_embracing_the_mobile_internet_10162014.pdf) ("Digital Nation Report").

<sup>36</sup> John B. Horrigan, PhD, *Closing Online Access Gaps for Older Adults*, Time Warner Cable Research Program on Digital Communications at 11 (Fall 2014), available at <http://www.twcresearchprogram.com/pdf/TWC%20Horrigan%20Project%20GOAL%20Paper.pdf>.

<sup>37</sup> *Rural Broadband At A Glance*, USDA (2013 ed.), available at <http://www.ers.usda.gov/media/1133263/eb-23.pdf>.

<sup>38</sup> Digital Nation Report.

<sup>39</sup> Smith Testimony.

<sup>40</sup> *Id.* ("When asked why they do not have internet service at home, 42% of internet users who lack home broadband cite financial issues such as: not having a computer; not being able to afford internet service; or having a cheaper option for access outside the home").

<sup>41</sup> Claire Cain Miller, "Why the U.S. Has Fallen Behind in Internet Speed and Affordability," *New York Times* (Oct. 30 2014), available at [www.nytimes.com/2014/10/31/upshot/why-the-us-has-fallen-behind-in-internet-speed-and-affordability.html?\\_r=0&abt=0002&abg=0](http://www.nytimes.com/2014/10/31/upshot/why-the-us-has-fallen-behind-in-internet-speed-and-affordability.html?_r=0&abt=0002&abg=0); see also Brian Fung, "The price of Internet is too high," *The Washington Post* (Oct. 28, 2013) available at <http://www.washingtonpost.com/blogs/the-switch/wp/2013/10/28/the-price-of-internet-is-too-high/> ("A high-speed plan will do nothing for you if its price is out of reach for ordinary consumers. And... Americans are still paying through the nose for what residents in some cities overseas get at a substantially lower rate"); see also Danielle Kehl, "New Yorkers Get Worse Internet Service Than People in Bucharest," *Slate Future Tense* (Nov. 21, 2014) available at

[http://www.slate.com/blogs/future\\_tense/2014/11/21/cost\\_of\\_connectivity\\_study\\_2014\\_americans\\_pay\\_more\\_for\\_slower\\_internet\\_access.html](http://www.slate.com/blogs/future_tense/2014/11/21/cost_of_connectivity_study_2014_americans_pay_more_for_slower_internet_access.html) ("You can expect to pay more than twice as much for 25 Mbps (a speed which FCC Chairman Tom Wheeler recently described as 'table



month for broadband speeds that cost \$300 a month in the U.S. The U.S. is ranked 30th in the world for speed, and we pay \$3.50 per megabit while Ukrainians pay just \$0.90.<sup>42</sup>

## RECOMMENDATIONS

Support modernization of the FCC's Lifeline Program. Question 7 asks whether any federal programs should allow the use of funding for the deployment of broadband infrastructure or promotion of broadband adoption that do not do so now. The Executive Branch, including all Executive Branch agencies, should support the FCC's Lifeline Program, which provides a modest subsidy to low-income families so that they may acquire and maintain communications services. The FCC is about to undertake a process that would modernize the program for the broadband era and allow customers greater flexibility to apply their benefit to the cost of a broadband connection. Lifeline is currently the only federal effort to provide direct-to-consumer support to address the affordability barrier to adoption of communications services. As an existing program, Lifeline is capable of providing relief to low-income families seeking broadband service relatively quickly and the Executive Branch should weigh in to support this process and populate the FCC's record with information about the importance of connecting low-income populations to broadband for better administration of other government programs.

All federal programs should support broadband adoption efforts. To directly answer the question posed in question 7, NHMC believes that all federal programs should allow some funding to be used to promote broadband access and adoption. Programs are missing huge swaths of target beneficiaries when there is no funding to close adoption gaps.

For example, this is especially clear in education as assignments, educational tools, and assessments increasingly move online. No child should be required to complete exams and homework online unless they have home access.<sup>43</sup> In this context, the Department of Education needs to help facilitate home broadband adoption.

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stakes' when it comes to broadband in the 21st century) in the United States compared with parts of Europe and Asia"); *see also* Tom Geoghean, "Why is broadband more expensive in the US?," BBC News (Oct. 28, 2013), *available at* <http://www.bbc.com/news/magazine-24528383> ("For instance, at high speeds of 45 Mbps and over, the OECD report has the US ranked 30th out of 33 countries, with an average price of \$90 a month").

<sup>42</sup> Claire Cain Miller, "Why the U.S. Has Fallen Behind in Internet Speed and Affordability," New York Times (Oct. 30 2014), *available at* [www.nytimes.com/2014/10/31/upshot/why-the-us-has-fallen-behind-in-internet-speed-and-affordability.html?\\_r=0&abt=0002&abg=0](http://www.nytimes.com/2014/10/31/upshot/why-the-us-has-fallen-behind-in-internet-speed-and-affordability.html?_r=0&abt=0002&abg=0); Micah Singleton, "Here's how terrible U.S. broadband service really is," Daily Dot (Sept. 5, 2014), *available at* [www.dailydot.com/politics/us-broadband-speed-cost-infographic/](http://www.dailydot.com/politics/us-broadband-speed-cost-infographic/).

<sup>43</sup> Christine Armario and Sally Ho, "Online Common Core testing lays bare tech divide in schools, Associated Press, Yahoo! Tech (May 11, 2015), *available at* [https://www.yahoo.com/tech/s/online-common-core-testing-lays-bare-tech-divide-155549423.html?gg\\_forward=true](https://www.yahoo.com/tech/s/online-common-core-testing-lays-bare-tech-divide-155549423.html?gg_forward=true).

One way to make these efforts is by exploring cross-sector partnerships. For instance, partnerships between educational providers and housing authorities have shown promise. Spartanburg, South Carolina, a town where half the students in the school district lacked home Internet access, is an excellent model for pilot projects. There, the Spartanburg Housing Authority partnered with a school district and two wireless providers to ensure all students have broadband at home.<sup>44</sup> Additionally, the partnership provides students with tablets and computers to overcome the affordability barrier posed by device costs.

However, agencies must go beyond the public-private partnership model and be allowed to directly fund significant efforts to move the needle on broadband adoption among their constituents. Given the stagnant state of broadband adoption in this country, urgent action is needed without having to wait to line up private sector partners.

Direct every agency that interacts with constituents on the Internet to train all public engagement and outreach staff and contractors to assist constituents that lack home broadband. In question 23, the RFC asked how the federal government can make broadband technologies more available and relevant for vulnerable populations. If an executive branch agency institutes a policy that requires or encourages important constituent communications to occur online, agency staff that interacts with constituents must be prepared to assist those who have yet to adopt broadband. This training should ensure that all staff members and contractors that interact with constituents are able to clearly describe the benefits of using online tools and direct constituents to resources that could help them obtain broadband Internet access. For instance, once the Lifeline Program is modernized to fully support broadband, all Executive Branch agency staff that interacts with low-income constituents should be prepared to direct such constituents to Lifeline and provide basic information about how to enroll.

Further, there should be more outreach and education about transactions that can be conducted online. All Executive Branch agencies should be required to direct callers to existing online services as part of standard phone tree greetings. The agencies should also streamline services and promote [benefits.gov](http://benefits.gov). Further, the government should be mindful of language barriers and ensure information about websites and services are available in as many languages as possible.

Instruct all Executive Branch agencies to improve their mobile websites. In further response to question 23, with nearly two-thirds of Americans owning a smartphone, the government should work toward making its sites and services easily accessible from mobile devices. This is

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<sup>44</sup> Joshua Bolkan, "South Carolina District Taps Partners To Launch Home Internet Access Pilot," THE Journal (May 1, 2015), *available at* <http://thejournal.com/articles/2015/05/01/south-carolina-district-taps-partners-to-launch-home-internet-access-pilot.aspx>.

important for the “19% of Americans who rely to some degree on a smartphone for accessing online services and information,” and mobile-friendly sites are especially critical for Latinos (13%), who are three times more likely than whites (4%) to rely on their smartphone as their sole means of Internet access.<sup>45</sup>

Evaluate the accuracy of the National Broadband Map. In question 28, the RFC asks if there are any 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. One gap is with the government’s own data—the National Broadband Map. A March 26, 2015 story about a new homeowner who had to sell his house because he could not get broadband illuminated a potential flaw in the National Broadband Map.<sup>46</sup> At this point, the accuracy of the National Broadband Map is questionable making it unclear how widely broadband is actually deployed in the U.S. According to the report: “The National Broadband Map lets you enter any address in the US to find out what Internet access options are available. The database shows 10 options at [the homeowner]’s house, including mobile and satellite, but they’re all either inadequate for home Internet service or unavailable. One of the 10 options is [a] fiber network that residents cannot use.”<sup>47</sup> This story raises concerns about the granularity of data included in the map and whether availability determinations should be made about entire geographic areas if only a handful of households are served.

Conduct a survey of federal government use of the Internet to interact with constituents and report on any resulting efficiencies or cost savings achieved. Question 29 asks what additional research should the government conduct to promote broadband deployment, adoption, and competition. The Council should survey and report on all government programs, forms, interfaces, events, and outreach that require Internet access and determine the amount of money that this migration online has saved. Doing so will be one way to demonstrate a return on investment for any current and future programs designed to spur broadband adoption.

Direct every agency and office that utilizes the Internet to interact with constituents to report on whether or not such outreach is currently sufficient. In further response to question 29, all executive branch agencies should determine whether or not and outreach that is exclusively housed online is effectively reaching the target populations. For instance, a government programs designed to serve households earning less than \$25,000 per year would risk excluding more than half of eligible households if it were to move its application process exclusively online. Each agency should estimate, based on the demographic characteristics of the population that it serves and current Census data about broadband adoption, how many

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<sup>45</sup> Aaron Smith, “U.S. Smartphone Use in 2015,” Pew Research Center (April 1, 2015), *available at* <http://www.pewinternet.org/2015/04/01/us-smartphone-use-in-2015/>.

<sup>46</sup> Jon Brodtkin, “New homeowner selling house because he can’t get Comcast Internet,” *Ars Technica* (March 26, 2015), *available at* <http://arstechnica.com/business/2015/03/new-homeowner-selling-house-because-he-cant-get-comcast-internet/>.

<sup>47</sup> *Id.*

fewer constituents it is able to reach using online versus traditional outreach and intake methods.

Research should provide a greater understanding of the broadband industry. In question 29, the RFC asked what additional research the government should conduct to promote broadband deployment, adoption, and competition. The government should conduct research about the economic impact of broadband adoption, not just broadband access. It should also research the impact of varying levels of competition in different markets and how pricing, innovation, availability, and adoption are impacted by competition. This research could help create more robust policy aimed at fostering new entrants and additional competitors.

Additional data should be sought about the actual costs of providing broadband service after initial capital expenditures are recouped. Understanding the cost of providing the service could help the federal government better craft adoption programs and set reasonable subsidy amounts in any relevant current or future programs.

Ensuring that everyone in this country is able to overcome the barriers to adopting broadband should be a top priority for policymakers. Indeed, if existing research is any guide, investments towards this goal will yield great returns. The Broadband Opportunity Council has a tremendous opportunity to build a bridge across the digital divide and ensure our vulnerable populations are not left behind. NHMC commends the President and the Council for beginning this process and is looking forward to future engagement to ensure Latinos and all Americans have universal and affordable access to broadband.

If you have any questions about these comments, please contact Michael Scurato, NHMC's Policy Director, at (202) 596-5711 or by e-mail at [mscurato@nhmc.org](mailto:mscurato@nhmc.org).

Respectfully submitted,

\s\ Michael J. Scurato

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