INTERGOVERNMENTAL ADVISORY COMMITTEE

TO THE

FEDERAL COMMUNICATIONS COMMISSION

ADVISORY RECOMMENDATION NUMBER 2013 – 10

**Regarding Potential FCC Strategies for Advancing Broadband Adoption and
Digital Literacy
WC Docket No. 12-23**

I.   INTRODUCTION

The Federal Communications Commission (Commission or FCC) has acted boldly to advance broadband adoption and foster digital literacy. The IAC also strongly supports these goals and applauds the Commission for its actions.

The Intergovernmental Advisory Committee (IAC) hereby submits an additional list of strategic recommendations we would like the Commission to evaluate to further these goals.

II.   SUMMARY OF ISSUES

The IAC strongly supports the Commission's view that an increase in the number of people knowledgably and responsibly using broadband would be economically, socially, and politically beneficial. These benefits would accrue to individuals, to society, and to broadband system and application providers.

Pew's "Digital Differences Report" notes that "one in five American adults does not use the internet. Senior citizens, those who prefer to take our interviews in Spanish rather than English, adults with less than a high school education, and those living in households earning less than $30,000 per year, are the least likely adults to have internet access."[1]

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[1]   Kathryn Zickuhr and Aaron Smith. Pew Research Center, April 13, 2012, at 1, http://www.pewinternet.org/Reports/2012/Digital-differences.aspx .

This gap raises the question of why usage is less than optimal. The Commission has documented that availability remains an issue for some. There is a tendency, however, to think that all unserved areas are low income or rural areas, and that all middle income urban areas are well served. This is not true. IAC Members have noted that Jacksonville, Florida includes a new five hundred home development that has been unable to get wired cable, voice or Internet service from either the incumbent cable franchise operator or ILEC. King County, Washington, home to Seattle and Redmond, also includes the small city of Skykomish which is without cable or wireless services.

Recent studies by Connected Nation focus on the reasons for non-adoption even when service is available. "[C]ost and affordability are important barriers to adoption, but not necessarily the largest." Other factors include: the absence of a perceived need (32%), and the lack of a computer (29%).[2]

Each of our strategic recommendations targets one or more of these barriers to broadband adoption.

III.   RECOMMENDATIONS

1.   **Require telecommunications companies seeking Connect America funds to include in their applications: (a) a thoughtful plan detailing a prospective marketing proposal (i.e., outreach to non-users) to connect "hard to convince" persons whose homes the company will pass with fiber or other communications technology, and (b) a proposal to address the digital illiteracy of these prospective customers.**

2**.   Make the implementation of such a plan a condition of receiving funds.**

It is anticipated that the digital literacy and outreach programs would be conducted in partnership with local agencies (e.g., senior services agencies) and that technical support would be provided by the telecommunications companies and in partnership with the local agencies.

Connect America funds are targeted at increasing the physical availability of service. Once service is available it is essential that potential new customers are made aware of this fact. Because the providers will want to attract these potential customers, it should not be burdensome for them to provide their marketing plans. Offering digital literacy training will elevate potential customers' awareness of broadband's benefits and make it more valuable to them.

3.   **Facilitate the development of a technology-neutral "Connect to Succeed" or "Connect for Life" program that includes wire, fiber, wireless, satellite, and other technologies.**

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[2] *Broadband Adoption Among Low-Income Households: Insights from Connected Nation Research*, Connected Nation, July 11, 2011, at 6, http://www.connectednation.org/sites/default/files/bbadoptionamonglow-incomehh_final_071111.pdf.

The IAC supports the cable industry's "Connect to Compete" project, but cable service is not available everywhere nor is cable the service of choice of many consumers. In addition, this worthy initiative excludes other technologies and providers. The FCC could partner with community and national organizations, and other constituency advocates to promote a broader, technology-neutral program. This will increase the number and variety of broadband services available and potential "salespersons" reaching out to persons currently unconnected.

4. **Require or encourage telecommunications companies merging or purchasing other providers to commit resources to digital literacy to the extent this is not prohibited by law.**

In the Comcast, GE, Universal, MB Docket No. 10-56, the Commission ordered the applicants to comply with a number of "CONDITIONS TO EXPAND BROADBAND DEPLOYMENT AND ADOPTION." The conditions included provisions for Comcast's "Broadband Footprint Expansion" and for the "Expanding Broadband Adoption – Comcast Broadband Opportunity Program." The Order further provided that the Expanding Adoption Program "shall address the three key barriers to adoption identified in the National Broadband Plan: (i) reducing the cost of broadband access for low income homes; (ii) the lack of a computing device in the home; and (iii) the absence of digital literacy." We think similar commitments requiring long term obligations to address these issues should be considered in the FCC's review of other mergers and acquisitions.

5. **Encourage service provider- and government-sponsored advertising and marketing campaigns to raise awareness of the importance of digital inclusion and to promote digital literacy. Target areas that have low broadband adoption and communicate the benefits of broadband technology as a learning medium.**

Several New York City agencies have successfully developed and used these strategies. For example, groups affiliated with the New York City Broadband Technology Opportunities Program (BTOP), such as the New York City Department for the Aging, the NYC Department of Parks and Recreation, the Brooklyn Public Library, the Queens Library, the New York Public Library and the New York City Housing Authority (NYCHA), have all developed successful ad campaigns to encourage uptake in computer use amongst seniors, job seekers and youth.

Also, the New York City Department of Technology and Telecommunications has produced a half hour TV program to highlight the value of broadband adoption and describe how digital access for all New Yorkers is being addressed. The BTOP TV program provided an overview of NYC Connected, which consists of three Broadband Technology grants.

Ads, public service announcements (PSAs) and public interest programming will all demonstrate the value and relevance of broadband adoption with a possible result that the target groups themselves would then turn and articulate the value of broadband adoption and access to broadband technology (e.g., training and affordable computers) within their communities and the world at large.

6.   **Advocate for the modification of appropriate U.S. government grant programs to state, local and Tribal governments to enable these governments to use grant funds for digital literacy training as well as capital expenditures.**

Given the clear link between digital literacy and broadband use, often the most effective programs for increasing usage include both capital expenditure and digital literacy training elements. Many of the relevant grant programs limit the use of funds to capital acquisitions. Removing that limitation would enable state, local, and Tribal governments to use these funds more effectively for digital literacy training and facilities.

7.   **Clarify that FCC rules do not prohibit public access video production facilities established wholly or partially as a result of cable television franchises or other applicable state or local law from providing digital literacy training and facilities.**

There has been some confusion on this public access video question. The result has been that some public access facilities question whether providing training and facilities is lawful and have been reluctant to act. Public access facilities have a record of reaching out to traditionally underserved communities and of providing technology and user training.

We believe that more facilities would engage in digital literacy training if the Commission cleared up this confusion.

8.   **Develop and implement plans to incentivize private businesses to participate in public-private partnerships for the provision of digital literacy training and broadband adoption.**

Both the public and private sectors gain by improving digital literacy in our country. There are several pockets of digital literacy training delivered by both sectors. An understanding of all of these efforts and an assessment of where partnerships will strengthen both public and private sectors is critical.

Incentives to private businesses may be an effective method to accelerate the delivery of digital literacy training. The nature of these incentives should be determined with an emphasis on addressing people and areas where this training currently does not exist and with demographic groups who are most likely to need the training. The incentives could be structured so as to encourage private entities to seek public sector partners in promoting the goals of the digital literacy training.

The size and complexity of the challenge is such that it is unlikely either sector will accomplish these goals without the other. In addition, many government workers have little experience in the private sector, and visa-versa. Partnerships have the potential to make both sectors more aware of the talents and useful practices available in the other sector.

9. **Explore and advocate for the implementation of measures designed to improve broadband service subscription by responsible people with poor credit histories.**

Many broadband service providers are reluctant to provide service to people with poor credit histories. Initiating service may require the provider to incur significant up-front costs. It may need to dispatch a truck and installer, run wiring, install software, and provide and configure an electronic device, such as a cable modem. The provider is, in effect, giving the customer a small loan. Typically, the provider recovers these costs over time through the service fee. This model fails if a customer does not pay her or his bill. Importantly, however, not all people with poor credit histories present a current high risk of nonpayment. It takes additional effort for companies to determine which of these potential customers will responsibly pay their bill. Given the importance of broadband service, we believe this extra effort is warranted.

10. **Establish a clearinghouse on best practices for digital literacy training and broadband adoption programs. Host seminars and webinars on these topics.**

While there are many digital literacy training programs and a number of broadband adoption programs today, there is no central repository of information on what programs work for specific purposes (e.g., the elderly, non-English speaking immigrants, etc.). The result is that in this time of limited government resources, state, local and Tribal officials have no way of knowing whether a proposed program has been or is likely to be effective. The Commission can host and support others organizations hosting free webinars and seminars on such best practices, with sufficient public notice and outreach.

Approved on this 14th day of August, 2013.

INTERGOVERNMENTAL ADVISORY COMMITTEE

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Joyce Dickerson, Chair