



October 6, 2017

**Federal Communications Commission**

**GN Docket No. 17-199 Reply to the National Digital Inclusion Alliance (NDIA) Comments:  
Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans  
in a Reasonable and Timely Fashion**

EveryoneOn respectfully submits these comments in response to the comments made by the National Digital Inclusion Alliance (NDIA) to the Federal Communications Commission (FCC) request for public comments on the Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion. EveryoneOn thanks the FCC for providing this opportunity to comment on this issue.

**About EveryoneOn**

EveryoneOn is a national nonprofit creating social and economic opportunity by connecting everyone to the internet. Since 2012, we have connected more than 500,000 low-income people in 48 states to free and affordable home Internet service, devices, and digital literacy training. We aim to leverage the democratizing power of the internet to provide opportunity to all people in the United States — using connectivity to create social mobility for all.

Our organization has been able to attain national scale while maintaining impact on a community level due to our three-part approach: 1) working with internet service providers to create and deploy low-cost offers; 2) creating a best-in-class digital platform, which is best described as a “TurboTax for digital inclusion” that families can use to access affordable internet service, devices, and digital literacy education; 3) and maintaining a nationwide network of partners across sectors who are working on-the-ground directly in communities. No other organization has brought together such a collection of assets to bridge the digital divide.

Serving as a facilitator between low-income communities and people and internet service providers, device refurbishers, and digital literacy trainers, we also work with enrollment partners (nonprofits, schools, and other community-based organizations) across the country to better reach eligible populations. Through our digital platform, partner platforms, and relationships with internet service providers and device refurbishers, we are able to market these affordable home internet offers and collect data in order to help people adopt the Internet and end the digital divide once and for all.

EveryoneOn would like to thank the NDIA for its helpful comments on the FCC’s inquiry, in addition to its long-standing efforts to encourage ubiquitous and affordable internet across the country. In particular, EveryoneOn would like to extend its support for NDIA’s recommendations 1

and 7 which recommend that the FCC not reduce the qualifying speed for advanced telecommunications services and approach different geographical and socio-economic environments with different considerations.

### **Maintain the Current Definition and Standards of Advanced Telecommunications Services**

EveryoneOn supports the current definitions of advanced telecommunication services and speed standards, and would strongly recommend against redefining them. Any reduction in the benchmark for speed would render advanced telecommunications services insufficient for residences, businesses, and anchor institutions around which communities, particularly in rural areas, thrive. In these ways, the proposed redefinition would create a two-tiered system whereby access to truly advanced telecommunication services would be reserved (a) for areas where it currently exists and/or (b) for those that could afford it in its current state, while low income and/or rural communities would be relegated to lower-speed broadband.

### **Ensure Deployment Strategies Reflect Specific Needs of Communities and Regions**

EveryoneOn supports the creation and implementation of advanced telecommunications systems that meet the basic needs and requirements for people to live in the increasingly digital world no matter where they live. As NDIA suggests on page 12 of its comments, the truest means to evaluate the breadth of internet access and determine the reasonableness of its deployment is to assess adoption in areas where broadband is already accessible. There is evidence to suggest that low-income people in the United States already rely heavily on mobile connections and devices, despite the availability of fixed broadband in many of their areas. Where broadband is accessible yet adoption remains low, it can be inferred that customers are not having their needs effectively met, particularly with regard to cost.

With increasing numbers of job applications, college applications, and homework assignments becoming available exclusively online, a connection to the internet in 2017 is truly a connection to the American dream. Instead of creating separate and distinct pathways of internet connectivity, the access to which is determined by location and income, EveryoneOn strongly encourages the pursuit of universal, high-speed, connectivity through policy interventions. EveryoneOn recommends that the FCC re-approve the nine Lifeline Broadband Providers (LBPs) whose approval was revoked in early 2017 and, with all speed, select a pathway for future LBP approval that will enable LBP approval with the greatest expediency and standardization of coverage.

In summary:

- EveryoneOn strongly endorses recommendations 1 and 7 from NDIA's list of comments
- EveryoneOn strongly recommends that the FCC not lower the standard speed benchmark in order to enable residences, businesses, and anchor institutions to function properly
- EveryoneOn recommends that strategies for increasing adoption reflect the needs of the particular geographic area they are targeting ( i.e. cost barrier vs access barrier)

- EveryoneOn strongly implores the FCC to re-approve the nine LBPs whose approval was revoked in early 2017 and approve a process for further LBP approval that will maximize speed of deployment as well as standardization of access

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chike Aguh". The signature is fluid and cursive, with the first name "Chike" and last name "Aguh" clearly distinguishable.

Chike Aguh  
Chief Executive Officer  
EveryoneOn