

# WORDSOUTH

A CONTENT MARKETING COMPANY

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January 14, 2021

## Via ECFS

The Honorable Chairman Ajit Pai  
The Honorable Commissioner Brendan Carr  
The Honorable Commissioner Jessica Rosenworcel  
The Honorable Commissioner Geoffrey Starks  
The Honorable Commissioner Nathan Simington  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

- **Re: Letter by WordSouth — A Content Marketing Company in WC Docket No. 20-445 – Wireline Competition Bureau Seeks Comment on Emergency Broadband Connectivity Fund Assistance**

Dear Chairman Pai and Commissioners Carr, Rosenworcel, Starks, and Simington:

The Federal Communications Commission (Commission) has been given the daunting task of setting up a \$3.2 billion broadband support program in very short order. The Emergency Broadband Benefit Program (Program), created from the Emergency Broadband Connectivity Fund under the Consolidated Appropriations Act, 2021, has the potential to help millions of Americans connect or remain connected to broadband service at a time when such connectivity is critically important for work, school, health and business. The success of the program is dependent on many things, from establishing eligibility requirements to engaging broadband providers to protecting against fraud. However, even if all the regulatory and administrative issues are worked out completely, success still hinges on the public's awareness of its availability and benefits.

In response to the Commission's request for public comment, we have prepared an outline for a plan of action we believe will greatly increase the opportunity for the Program's success. It is centered around a streamlined, coordinated and centralized approach. We lay out the benefits below; but first, to understand the impact of the alternative — a disjointed, decentralized communications effort — we need look no further than the first several months of the pandemic response in America. While federal officials provided daily updates for a few weeks, the actionable response was largely left to the states. This not only included coordination of equipment and protective gear for hospitals, but also critical messaging concerning personal safety precautions. Citizens were seeing varying responses across states, which led to confusion, distrust and misinformation.

In contrast, we recommend the vitally important public awareness portion of the Program be developed and spearheaded by either the Commission or the Universal Service Administrative Company (USAC). Our belief that this would best position the Program for success is based on our company's decades of service to the rural telecommunications and electric industries.

Through the years we have helped incumbent telcos promote everything from their “new blazing fast” 56k dial-up service, transitions to DSL, fiber education, and Gig launches. We have worked with electric cooperatives moving into the broadband business through partnerships, joint initiatives, and standalone programs. We have supported broadband providers as they have built new networks with state grants and federal programs such as the American Recovery and Reinvestment Act, Connect America Fund and ReConnect (and, hopefully, the Rural Digital Opportunity Fund). Through our work, both past and current, we have learned some important things about these companies that can inform the rollout of the Commission’s Program:

1. Most rural broadband providers operate with limited staffs, especially in the communications and marketing departments, and these employees often have additional duties that extend beyond communications and marketing.
2. Most rural broadband providers today are extremely busy and their staffs are stretched thin. In fact, many clients have indicated they are busier than they have ever been. This level of activity is due to:
  - building out new broadband service in their incumbent service areas;
  - building out new broadband service in competitive service areas;
  - pursuing and managing grants and loans to build new broadband service; and/or
  - managing the impact of the pandemic, both in terms of employee safety and customer well-being.

In light of these facts, it is particularly critical that promoting awareness be as streamlined and efficient as possible to ensure the greatest chance of success for the Program. Our recommendations for a comprehensive communications campaign include:

### **Centralized Program**

A communications program offered by either the Commission or USAC would provide a comprehensive solution that broadband providers could access and put to work, with minimal effort, at the local level to promote the Program in their communities. This would allow their already busy staffs, now tasked with administering yet another initiative, to quickly deploy a targeted communications campaign.

### **Consistency**

This comprehensive communications program would provide consistency throughout the country with uniform messaging, colors, images and text. This consistency would support and build awareness.

### **Centralized Access**

The entirety of this communications program, we recommend, would be available via a website serving as a central online portal for all components. Broadband providers would register at the website for immediate, cost-free access to all supporting materials, including:

- internal messaging pieces to inform employees about the program (this is arguably the most important component, because all employees must be aware of and understand the program in order for its implementation to be a success for the provider)
- talking points for employees to use when interacting with customers
- social media graphics and messaging
- point-of-sale materials such as posters for counters and lobbies
- customer-focused materials such as a brochures and fliers to give to prospective participants in the field or office

- letters and fliers to send to schools, libraries, health care offices and other anchor institutions to solicit their help in promoting the program and provide them with supporting materials
- TV commercials for those providers with local ad insertion capabilities, allowing them to drop ads into open slots

These and similar materials would be prepared in such a way as to allow broadband providers to customize them with their company names and logos. Alternatively, the agency chosen by the Commission or USAC to develop this project could provide customization and even print fulfillment services for those broadband providers needing additional support.

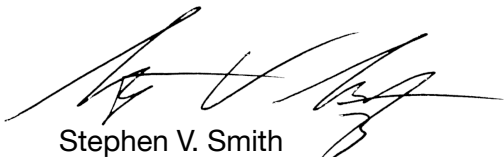
### **Eligibility Language**

In terms of messaging, the components of this campaign should clearly state the eligibility requirements. A prospective beneficiary of the Program is more likely to contact a provider if the marketing materials make them aware they qualify. The messaging should be clear that prospects only need to contact a provider to enroll and provide proof of eligibility, versus having to contact a provider just to see if they qualify. This would have the added benefit of making the program simpler to administer for providers, particularly new entrants and non-ETCs without a baseline understanding of and experience with managing Lifeline eligibility.

Lastly, in the best interest of the Program, we believe participating broadband providers should be highly encouraged, if not required, to use some elements of the Commission- or USAC-sanctioned communications campaign to promote the Program within their service areas.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully Submitted,



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