



October 12, 2020

Hon. Ajit Pai, Chairman  
Hon. Jessica Rosenworcel, Commissioner  
Hon. Michael O'Rielly, Commissioner  
Hon. Brendan Carr, Commissioner  
Hon. Geoffrey Starks, Commissioner  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

RE: Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84

Dear Chairman Pai and Commissioners:

Our respective organizations have long advocated for digital inclusion and policies that ensure that Latino and economically disadvantaged communities are able to benefit from the wide range of opportunities offered by broadband access. While we do not speak to the legal arguments set forth in the NCTA Petition in the above-referenced matter, we strongly support efforts to expand broadband deployment in rural areas and encourage the FCC promptly to consider the NCTA Petition in order to ensure that broadband is being delivered to rural areas in an equitable and time efficient manner.

While U.S. broadband networks have performed reasonably well during the pandemic, the pandemic has exposed certain remaining and persistent gaps in the digital divide, especially in rural areas. Now more than ever, access to reliable, high-speed internet is a necessity, as Americans have turned to the internet for a range of digital services during the pandemic, including online learning, remote work, and telehealth. Unfortunately, reports have shown that the vast majority of Americans lacking access to high-speed internet live in rural areas.<sup>1</sup> This includes communities of color which (on average) make up 20 percent of these rural communities.

Indeed, low-income Latino and Black individuals make up a significant portion of the millions of households across the country that lack access to broadband, a disparity that is only further worsened by the disproportionate economic impact COVID-19 has had on these communities in the form of

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<sup>1</sup> Rural Health Research Gateway, Disparities in Preventive Care by Race and Ethnicity Among Rural Adults - [https://www.ruralhealthresearch.org/projects/100002425#:~:text=Currently%2C%20in%20%20rural,Prevention%20\(James%20et%20al.](https://www.ruralhealthresearch.org/projects/100002425#:~:text=Currently%2C%20in%20%20rural,Prevention%20(James%20et%20al.) "Currently, 1 in 5 rural residents is a person of color or American Indian, adding up to nearly 10 million rural residents who are black, Latinx, Indigenous, Asian, or mixed-race." *Id.*

temporary and permanent job loss.<sup>2</sup> Hispanic and black Americans have been hit the hardest, with 61% and 44% respectively reporting a job or wage loss due to Covid-19, compared with 38% of whites. High rates of unemployment in communities of color have only intensified the need for broadband access in rural communities, along with other emerging digital needs related to online schooling and access to telehealth services. The federal government and the FCC should take the steps needed to bridge this exacerbated digital divide.

In addition to providing financial resources where appropriate, these steps by Congress and the FCC should include removing unnecessary legal, regulatory, and economic barriers to broadband deployment and investment. Given the expansive geographic nature of most rural areas, eliminating infrastructure barriers is critical and necessary to delivering broadband connectivity to rural households and businesses.

COVID-19 has exposed the gaps that still exist in delivering high-speed internet to all Americans, especially in rural areas. We hope that you will stand with us to expand opportunities by encouraging broadband buildout and connecting as many rural communities as possible to the internet. There has never been a more urgent time to ensure that rural unserved communities gain access to broadband as soon as possible, including the millions of rural Hispanic and communities of color that have too often been left behind.

We encourage timely review of the NCTA Petition in order to ensure that any barriers to rural broadband deployment and investment are removed.

Sincerely,

**Sindy Benavides**  
Chief Executive Officer  
LULAC

**Frankie Miranda**  
President & CEO  
Hispanic Federation

**Rudy Arredondo**  
President & CEO  
Latinos Farmers & Ranchers

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<sup>2</sup> According to recent findings by the Pew Research Center, “job and wage losses due to COVID-19 have hit Hispanic adults the hardest.” Pew Research Center, Financial and health impacts of COVID-19 vary widely by race and ethnicity, May, 5, 2020 - <https://www.pewresearch.org/fact-tank/2020/05/05/financial-and-health-impacts-of-covid-19-vary-widely-by-race-and-ethnicity/>. Pew reports that 61% of Hispanic Americans reported a job or wage loss in their household due to the coronavirus outbreak, compared with 38% of white adults and 44% of black Americans. *Id.*