

January 25, 2021

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: EMERGENCY BROADBAND CONNECTIVITY FUND ASSISTANCE
WC Docket No. 20-445**

Dear Ms. Dortch:

The Robert W. Deutsch Foundation invests in innovative people, projects, and ideas that improve the quality of life in Baltimore and beyond. For over thirty years the Foundation has brought a lens of racial equity and a commitment to actions that challenge those inequities to our grant making, priority setting process, programming and strategic planning in the city of Baltimore.

Today we submit the following on behalf of the Johnston Square Partners, an alliance of nonprofit stakeholders which include ReBUILD Johnston Square Neighborhood Organization, ReBUILD Metro, Baltimoreans United for Leadership Development (BUILD), Baltimore Arts Realty Corporation (BARCO) and St. Frances Academy.

Recently, the alliance released the Johnston Square 2020 Vision Plan, a collaborative document which provides a roadmap for equitable neighborhood reinvestment. Now, following decades of disinvestment, blight and crime, the neighborhood is uniquely positioned to rebuild a more humane and resilient community with a focus on the following common themes:

- Establishing a clean and attractive neighborhood;
- Providing diversity of retail and housing options;
- Developing a variety of open spaces and community assets; and
- Creating safe streets

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We are committed, excited and hopeful, yet we also recognize that we will not be able to achieve our shared vision without affordable, reliable and high-speed broadband for all Johnston Square's residents, and by extension, Baltimore's most vulnerable communities.

Across the city of Baltimore, more than 40% of the population lacks home internet access, approximately 96,000 households¹, the majority of which are Black and Latinx. Black and Latinx residents are not only most impacted by Baltimore's digital divide, but are also most likely to suffer from educational setbacks, economic loss, and compromised health conditions associated with the COVID-19 pandemic. Income inequality, biased credit scoring and other forms of systemic racial discrimination are just some of barriers that low-income populations and communities of color continue to face. These households are denied the power of broadband to apply for jobs, pursue educational opportunities, participate in civic life and organize for social change.

In the Johnston Square area, more than 55% of residents under the age of 18 live below the poverty line; 34.5% of households lack home internet access and the median household income is just over \$19,000.² To compound the challenge, Johnston Square lacks a library within its boundaries, eliminating any supplemental Wi-Fi support, and the local elementary school, Johnston Square Elementary, which sits in the heart of the neighborhood, has not applied for E-rate. In effect, this means the community does not even have "parking lot" Wi-Fi.

As the FCC considers the guidelines for the Broadband Connectivity Fund, we ask that you center the needs of families, like those in Johnston Square. These residents, many of whom are students, must have broadband access to continue their education. Additionally, their families need broadband access for healthcare and job searching.

To ensure the most vulnerable of residents is able to successfully access this vital resource, the FCC must:

- Ensure that providers of all sizes--not just the incumbents--be included in the program;
- Conduct targeted media outreach--especially to ethnic media--to ensure that low-income households are aware of their eligibility for the Emergency Broadband Benefit and hear about it through trusted messengers via broadcast and print media;
- Design and make available digital materials that community based organizations can easily print, post and distribute; keeping in mind the need for language accessibility and literacy levels;
- Host Town Halls in "majority minority communities" (*sic*) so that community anchor institutions, civic leaders and local and state officials learn about the ways to support and/or promote participation in the program;
- Elevate trusted community institutions as champions of this vital program, recognizing places of worship, HBCUs, neighborhood associations and nonprofits as leaders in connectivity, driven by public interest values instead of profit margins; and

¹Abell Foundation. "Baltimore's Digital Divide: Gaps in Internet Connectivity and the Impact on Low-Income Residents." Updated May 2020. <https://abell.org/publications/baltimores-digital-divide-gaps-internet-connectivity-and-impact-low-income-city>

² Baltimore Neighborhood Indicators Alliance. Vital Signs by Community. Retrieved from https://bniajfi.org/community/Oldtown_Middle%20East/

- Work with Universal Service Administrative Company and participating providers to ensure that Lifeline subscribers know that they are also eligible for the Emergency Broadband Benefit.

Sincerely,
(in alphabetical order)

Baltimore Arts Realty Corporation
Baltimoreans United in Leadership Development (BUILD)
Byte Back
Mt. Sinai Baptist Church
PCs for People Maryland
Project Waves
ReBUILD Johnston Square Neighborhood Organization
ReBUILD Metro, Inc.
Robert W. Deutsch Foundation
Saint Frances Academy