



Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, D.C. 20554

Re: WC Docket No. 20-445

Good Afternoon,

On behalf of Tech Goes Home, a Boston-based nonprofit working to address digital inequity and empower individuals and families to take advantage of opportunities provided by the digital world, we are grateful for the invitation to submit these comments regarding the implementation of the Emergency Broadband Benefit Program.

The COVID-19 crisis has underscored the deep digital inequities facing our communities, and created an even more urgent need to advance comprehensive, sustainable solutions that will ensure online access to school, work, healthcare, and other critical services. The investment of \$3.2 billion to support the Emergency Broadband Benefit Program represents a critical infusion of resources, but the ultimate effectiveness of the benefit will be determined by how it is implemented. We urge the Federal Communications Commission, the Wireline Competition Bureau (hereafter “the Bureau”), and other relevant officials to be intentional about centering equity, accessibility, and community engagement in the rollout of this new program.

Specifically, the Bureau requests comment on how to define “household” for the purposes of administering the Emergency Broadband Benefit Program, and whether multiple enrollments should be allowed from the same address, among other related questions.

- Our perspective is that “household” should be defined in such a manner and final rules for the benefit constructed so that multiple related or unrelated individuals or family groups residing at the same address are able to enroll independently in the program. Oftentimes, digital inequity appears not only when individuals or families lack access to digital devices and internet connectivity entirely, but when “households” - especially those with multiple young people in school and/or working adults - lack access to enough devices to participate in school, complete job responsibilities, and access other resources simultaneously. For this reason, ensuring that individuals and distinct family groups residing together are each able to realize the full benefit envisioned by the program is paramount.

In addition, any final regulations should ensure there is a mechanism for individuals or families experiencing homelessness and/or without a fixed address to enroll in the program. Tying eligibility to a fixed address has the potential to deny this critical benefit to those who may need it most urgently - to access housing support services, maintain a job or find new employment opportunities, attend school, and more.

In addition, the Bureau asks both how households with students in schools covered by the U.S. Department of Agriculture (USDA) Community Eligibility Provision should be considered eligible households for the Emergency Broadband Benefit Program, and how the Commission can facilitate the ability of schools to connect with their students for the purposes of remote learning.

- In our view, any family with a student (or students) eligible for free or reduced price school meals - regardless of whether that eligibility is determined on an individual or school-wide basis - should be eligible for the Emergency Broadband Benefit Program. Creating additional barriers to eligibility in an attempt to parse families with students in USDA Community Eligibility Provision schools will inevitably lead to more families who should be eligible for the broadband benefit being excluded.

To the broader question of how the Commission can facilitate the “ability of schools to connect with their students for the purposes of remote learning,” comprehensive training for students and families must be a part of the solution, alongside access to digital devices and internet connectivity. Without appropriate training and support, handing someone a computer or tablet with access to the internet can be like handing them a book without first teaching them how to read. The Commission has a potentially important role to play by actively incentivizing the provision of high-quality training and



support, and by serving as a clearinghouse to share best practices for ensuring that individuals and families are prepared to utilize devices and connectivity effectively to access school, work, and other services.

Furthermore, the Bureau seeks comment on “whether the Commission should provide any further clarity regarding services that are eligible for reimbursement in the Emergency Broadband Benefit Program,” beyond the definitions provided by the Consolidated Appropriations Act and the Commission’s existing rules.

- In keeping with our earlier point about the importance of skills training, we believe that internet service providers (ISPs) and any other eligible entities participating in the Broadband Benefit Program who choose to subsidize digital training for economically-eligible families (alongside the provision of internet connectivity and connected devices) should be eligible for reimbursement for the cost of that training. This will help ensure that individuals and families are able to realize the ultimate goal of the benefit - efficiently and effectively accessing school, work, and other resources online.

Finally, the Bureau asks about the best methods for publicizing the availability of the Emergency Broadband Benefit program, specifically to communities most in need.

- In our experience, clear actionable guidance developed in deep partnership with community-based organizations is critical to the long-term success of programs like the Emergency Broadband Benefit. The Bureau should pursue all available means of publicity and should ensure that outreach materials and information are multilingual, culturally competent, and simple, in order to diminish barriers to participation as much as possible.

The Bureau raises the potential of leveraging “schools, libraries, and other local institutions” to inform communities about the availability of the benefit; the Bureau should absolutely prioritize these collaborations - along with nonprofits and other organizations active in target communities. Deep local partnerships are critical not only to identifying the most effective mechanisms for reaching communities in need, but will facilitate greater participation by leveraging the existing trust between residents and their local institutions and organizations. The Bureau should also ensure adequate resources are available so that outreach does not create additional financial burdens on local partners.

Once again, we thank the FCC and the Bureau for the opportunity to comment on the implementation of the Emergency Broadband Benefit Program. We encourage you to act with all haste to implement this program to help address the deep digital inequity in our communities, which has become particularly dire in the context of the COVID-19 pandemic. If implemented thoughtfully and with an intentional focus on equity and sustainability, we believe this program can not only help individuals and families weather the current crisis, but generate momentum towards ending digital inequity in the long run.

Please do not hesitate to reach out to us at [dan@techgoeshome.org](mailto:dan@techgoeshome.org) and/or [theo@techgoeshome.org](mailto:theo@techgoeshome.org) if we can provide any resources or answer any outstanding questions.

Sincerely,

Dan Noyes and Theodora Hanna, Co-CEOs  
Tech Goes Home