

January 25, 2021

Office of the Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: WC Docket No. 20-445**

Dear Commission's Secretary:

United Spinal Association is pleased to submit the following comments in response to the Federal Communications Commission's (FCC or Commission) request for comment on the Emergency Broadband Connectivity Fund Assistance (EBB) program.

Celebrating our 75<sup>th</sup> anniversary this year, our vision is to build an inclusive world and embrace the talents of all people with physical disabilities to achieve their full potential. Founded by paralyzed veterans, United Spinal Association is dedicated to enhancing the quality of life of all people living with spinal cord injuries and neurological disorders (SCI/D), including veterans, and providing support and information to loved ones, care providers and professionals. United Spinal has 75 years of experience educating and empowering over 2 million individuals with SCI/D to achieve and maintain the highest levels of independence, health and personal fulfillment. United Spinal has over 57,000 members, 50 chapters, close to 200 support groups and more than 100 rehabilitation facilities and hospital partners nationwide, including 10 distinguished Spinal Cord Injury Model System Centers that support innovative projects and research in the field of SCI. United Spinal Association is also a VA-accredited veterans service organization (VSO) serving veterans with disabilities of all kinds.

**A Roadmap to National Universal Broadband Coverage**

United Spinal shares Acting Commission Chairwoman Jessica Rosenworcel's enthusiasm and high hopes for the EBB program. We agree with the Acting Chairwoman that we "need to find ways to get 100% of us connected in this country and this program is an essential part of making that happen." Indeed for our members, a sustained federal investment to ensure deployment and maintenance of a high capacity, secure and reliable 5G broadband national network that is accessible, affordable, adoptable for all Americans is fundamental to our daily independence. That independence empowers us to care for our personal health and livelihoods by earning a fair wage, securing an education and contributing to our nation's economy. We absolutely agree with the Chairwoman's assessment that the EBB should and can play a major role in permanently connecting 100% of us to the Internet with equitable deployment of broadband. Thank you, Acting Chairwoman Rosenworcel for making this important nexus. United Spinal is hopeful that EBB will be viewed, constructed and analyzed as a roadmap leading to strategies, data, prototypes and programs to implement a national system of broadband service to all.

To this end, United Spinal requests that, in addition to the reporting and auditing requirements in law for Congressional notification, the Commission memorialize as much of the decision making and justifications for the implementation of the EBB in order to save time and precious taxpayers' dollars in order to efficiently guide future opportunities presented to permanently expand broadband services to the American people. United Spinal also encourages the Commission to coordinate with other federal entities that serve the disability and senior communities to gather useful information on the accelerated explosion of broadband usage over the last several months. Despite the unparalleled tragedies and torment the COVID 19 pandemic has reaped upon the American people, almost overnight, the health crisis helped achieve what those of us in the disability community have sought for years, remote healthcare, learning work and shopping.

The disability community has also long sought a national broadband superhighway, because sadly, there is no traditional transportation superhighway for us. Certainly there is no public sector universal door to door, safe, on demand, accessible and reliable transportation system for our community, especially for wheelchair users. Nor is there any doubt how much the lack of such a transportation system is costing the American people. One study, focused just on the disability community, the Ruderman White Paper on Self-Driving Car Technologies: The Impact on People with Disabilities, suggests, two million employment opportunities could result and \$19 billion in annual healthcare costs saved if people with disabilities had access to basic transportation needs that autonomous vehicles could provide.<sup>1</sup> Of course, broadband development, including 5G, and deployment is an essential prerequisite to the promising automated vehicle industry.

Broadband availability can also help bring an end to the detrimental impact related to individuals being isolated for whatever reason: "An estimated 25.5 million Americans have disabilities that make traveling outside the home difficult, according to the Bureau of Transportation Statistics report Travel Patterns of American Adults with Disabilities.<sup>2</sup> An estimated 3.6 million with disabilities do not leave their homes. People with travel limiting disabilities are less likely to own a vehicle or have vehicle access than people without disabilities...An estimated 71 percent reduce their day-to-day-travel, while an estimated 41 percent rely on others for rides." Make no mistake, we are not advocating universal broadband deployment as a substitute for a robust traditional transportation system. United Spinal believes the development of both transportation and broadband must be done in concert so that each complements the other. And that the American consumer, whatever the new normal economy yields, will be best served by the smart construction of both a national transportation and broadband system.

### **EBB Fundamental Principles**

As we agree programs, like EBB, can speed broadband deployment, we also believe they can and in fact must, simultaneously ingrain fundamental principles in broadband infrastructure so that users of all abilities can maximize their utilization of their individual broadband service.

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<sup>1</sup> [https://rudermanfoundation.org/wp-content/uploads/2017/08/Self-Driving-Cars-The-Impact-on-People-with-Disabilities\\_FINAL.pdf](https://rudermanfoundation.org/wp-content/uploads/2017/08/Self-Driving-Cars-The-Impact-on-People-with-Disabilities_FINAL.pdf)

<sup>2</sup> Brumbaugh, Stephen. Travel Patterns of American Adults with Disabilities (Washington: Bureau of Transportation Statistics, 2018), <https://www.bts.gov/travel-patterns-with-disabilities>

**Accessibility:** Infusing full accessibility requirements in the EBB program for providers should be a given. Accessibility in both service and device selection are essential if people of all abilities are to equitably employ the Internet's vast resources.

**Consumer Choice:** Secondly, consumer choice in utilizing federal assistance should be a fundamental consideration. While much accessibility work still needs to be done in the digital world, United Spinal appreciates the efforts broadband providers have made with accessibility in recent years and we believe that most existing broadband consumers are equipped to know which services best meet the needs of their individual abilities. FCC efforts to assist new customers are outlined in consumer outreach below.

The Commission should allow for as many providers as possible to participate in the EEB program to provide as large a range of choice in services for consumers. United Spinal concurs with NCTA – The Internet & Television Association that, “achieving the goal of robust provider participation from non-ETC companies will require the Commission to take a number of affirmative steps in developing the EBB Program.” To expedite EBB program participation by their customers, it is our hope that the Commission is doing everything possible now to reach out to non-ETC-companies to seek their counsel on how they can best participate in the EBB program for their customers.

Please know, through our membership network, United Spinal will gladly assist the Commission in its provider outreach efforts. Greater choice, we hope, will also drive greater competition, not only in providing more services for less cost but in driving additional innovations in accessibility to attract more of the 61 million Americans with differing abilities.

**Consumer Outreach:** To maximize EBB program participation, the FCC must employ a multifaceted outreach program to attract both providers and consumers.

Disability organizations, like United Spinal, can play a role in spreading the news. Please utilize us. FCC should continue to seek input from disability and senior organizations interested in the testing, development, and deployment of broadband services and related consumer devices through direct consultation with these groups. The Commission in consultation with its Disability Advisory Committee should establish dedicated technical assistance endeavors that promote the inclusion of the perspective shared by these groups. Further, the FCC should establish a public-private initiative dedicated to utilizing innovations to address the needs of underserved populations, particularly individuals with disabilities and older adults.

Public workshops should be used to gather additional input and to spread information on how the EBB program can be used to address the needs of people of all abilities and ages.

**Regulatory Streamlining:** United Spinal, as we believe and as the FCC appreciates, the message from Congress urges the FCC to simplify, simplify, simplify. Simplifying the EBB program consumer and provider participation requirements as much as possible to maximize consumer and provider participation by using existing programming and verification processes will encourage participation. And a concise messaging and marketing campaign built upon those existing standards assists all stakeholders in more successfully helping the FCC with its program goals. Again, United Spinal wants to assist and a simplified program inevitably simplifies messaging for organizations across the digital spectrum.

Thank you for considering these comments. Please do not hesitate to contact Kent Keyser, Public Policy Fellow, with any questions at (718) 803-3782 or [kkeyser@unitedspinal.org](mailto:kkeyser@unitedspinal.org).

Sincerely,

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