



Office of the Mayor

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January 25, 2021

SUBMITTED VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L St. NE
Washington, DC 20554

Re: Emergency Broadband Benefit Program Docket No. 20-445

Dear Ms. Dortch:

Thank you for providing the City of Madison with the opportunity to provide comments on the Federal Communication Commission's Emergency Broadband Benefit Program.

The COVID-19 pandemic has demonstrated to Madison officials the growing digital divide between those who have access and those who do not. During the COVID-19 pandemic, virtual learning, health-care management, teleworking, and social connections have been difficult for those who have internet; for those without internet, there is not even a possibility of internet access at all.

The City of Madison has partnered with several governmental entities (Madison Metropolitan School District, Community Development Housing Authority and Madison Public Libraries) to address the increasing digital divide. Current collaboration efforts have primarily focused on ensuring all students are able to access the internet for virtual learning, and addressing the digital divide in Community Development Housing, to name a few. We believe that the FCC's Emergency Broadband Benefit Program will increase the number of students and residents who would be able to receive low-cost internet.

For Madison Metropolitan School District students, the most typical eligibility criterion is the "Free & Reduced Lunch status" when determining a student's minimum eligibility. Program benefit limitations would be based on the type of service provided. For example, if the service is a mobile cellular hotspot,

then one device per student would be the limit. If the service is a landline with at least 30 Mb of download connectivity and includes Wi-Fi hardware for the student, then it would be one service per household. The school district's system requirements for required educational software and hardware include a Chromebook device with webcam, microphone, 4 GB RAM, processor capable of handling virtual meetings, 32GB flash storage and a touch-screen display for elementary-aged students. The device, if newly purchased, must guarantee 4 years of Google Chrome OS management support to prevent premature obsolescence.

Currently, the City of Madison and the Community Development Housing Authority are participating in a study to examine the digital divide climate in CDA Housing. The CDA Residential Internet Survey Report, stated that there were "substantial gaps in acquisition of residential internet access services, but also that relatively few residents are taking advantage of available subsidized programs from Spectrum and, to a lesser extent, AT&T." [CTC-Technology & Energy CDA Residential Internet Survey Report]. The following are their key findings:

- Substantial percentages of CDA residents do not have a home internet connection;
- 44 percent reported not having a home internet connection;
- 42 percent reported not having cellular/mobile phone with internet service; and 25 percent reported having neither form of service at home;
- Those who lacked either form of service tended to be older;
- CDA residents may be significantly underutilizing existing broadband subsidy programs;
- Some CDA residents who need internet access at home for work are not using services that are likely to always suffice for telework;
- Nineteen percent of all respondents only use a smartphone for home internet access;
- Most respondents say they find broadband unaffordable;
- CDA residents are very price-sensitive;
- Despite these various gaps, most respondents do use the internet. Most (80 percent) respondents.

In terms of the residential broadband access gap, 44 percent of respondents reported that they do not subscribe to residential internet service, and 25 percent have neither a residential internet subscription nor a mobile subscription. At the same time, for those who do have subscriptions, there appears to be significant underutilization of existing low-cost programs for which many CDA residents may be eligible.

We urge the Commission to require participating providers to publicize the availability of their low-cost programs in their service areas since there is a definite lack of knowledge about program availability in Madison. We encourage providers and the FCC to work directly with local governments to ensure that program benefit reach as many eligible households as possible. As we have worked to connect residents to low-cost internet programs, we have done the following to raise awareness in our community:

- developed a Madison Public Library telephone internet access information line for residents
- assisted residents in applying for low-cost internet programming
- developed a City of Madison COVID-19 Community Resources website with information on opportunities for low-cost internet
- partnered with DANEnet, to support the Everyone On Madison program, to provide digital literacy, low-cost devices and assistance enrolling in low-cost internet service

By providing the opportunity for the FCC's Emergency Broadband Benefit Program, residents will have more opportunities to connect. Access to the internet will connect residents to jobs and children and

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parents to schools and educational opportunities, and reduce isolation among our disabled/elderly population by providing access to health-care options and to connecting socially with family and friends.

Sincerely,

A handwritten signature in black ink, appearing to read "SRConway". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Satya Rhodes-Conway, Mayor, City of Madison

cc: Sarah Edgerton, Director, City of Madison IT
Greg Mickells, Director, Madison Public Library
Tom Conrad, Interim- Director, Housing Authority