In the Matter of )
EMERGENCY BROADBAND )
CONNECTIVITY FUND )
ASSISTANCE )

WC Docket No. 20-445

COMMENTS OF
THE CITIES OF LOS ANGELES, CALIFORNIA; CHICAGO, ILLINOIS; PORTLAND, OREGON; BOSTON, MASSACHUSETTS AND THE TEXAS COALITION OF CITIES FOR UTILITY ISSUES

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EXECUTIVE SUMMARY

The cities of Los Angeles, California; Chicago, Illinois; Portland, Oregon, Boston, Massachusetts and the Texas Coalition of Cities For Utility Issues file these comments to thank the 116th Congress for creating the $3.2 billion Emergency Broadband Connectivity Fund and to offer our support, insights and pledge of assistance to the Federal Communications Commission as it seeks to best develop and execute an EBC program to implement Congress’ vision.

We offer insights based upon our many years of local partnerships to address the digital divide in our communities including that money is not the only obstacle to connecting the unconnected and partnering is the only way to succeed. Through partnerships one comes to appreciate the vast resources that already exist, but are not known of nor coordinated.

The numerous digital divide efforts in place at the local level can and should serve as models for the Commission. The Commission can adopt, and benefit from, our insights, such as

- Eligible recipients many times are not aware of programs and support that are available to them, therefore outreach must be an integral component of the Commission’s plans;
- Community based organizations, schools, public housing agencies and other local entities have existing relationships with the targeted communities and can be of invaluable support in both identifying and certifying parties’ eligibility.
- State and local issued cable franchises should be used as a proxy for the Commission to certify numerous additional broadband providers. Our experience is that these parties are already equipped [or highly qualified] to immediately begin participating in the EBC and bridging the digital divide.
- By ensuring that individuals and families signed up for existing bulk purchases and sponsored programs are eligible for reimbursement, the Commission can piggyback on the labor and successes of numerous local programs.
- While families with school aged children are rightly seen as primary beneficiaries of the Act and the EBC, the Commission must strive to help all eligible parties participate so that they might live, work, learn and succeed in the digital world.
- Preserve flexibility to serve the homeless and those that are in transitional housing such as abuse shelters.
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Before
The Federal Communications Commission
Washington DC

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I. INTRODUCTION

A coalition of local governments submit these comments in response to the Public Notice released on January 4, 2021, seeking comment and suggestion on how best to implement the Emergency Broadband Connectivity Fund. The cities of Los Angeles, California; Chicago, Illinois; Portland, Oregon; Boston, Massachusetts and the Texas Coalition of Cities for Utility Issues submit these comments. There is no question that the digital divide is seen in our communities and in the nation, so we will not spend any time establishing the need for a response.


3 The City of Los Angeles is proud to continually seek solutions to connect our most vulnerable residents to the online services and information they need to thrive. At the beginning of the COVID-19 pandemic, the City of L.A. launched its GetConnectedLosAngeles.lacity.org site to provide information on low-cost and no-cost internet connectivity options for all Angelenos, especially for our students who were now in a distance learning environment. As the conditions of the pandemic kept Angelenos 'Safer at Home', the City began convening the LA Telecommunications and Digital Equity Forum, meeting frequently with all telecommunication providers on solutions to destroy the digital divide and to expedite the build out of 4G and 5G across L.A. including in areas previously digitally divided. Starry Internet moved quickly to
provide 6 months of free broadband to residents in our public housing facilities, reaching 9,000 households as of December 31, 2020. In addition, the City launched the Angeleno Connectivity Trust (ACT) in partnership with the Mayor's Fund for Los Angeles and T-Mobile, to provide 18,000 WiFi hotspots to K-12 students experiencing homelessness, with a disability and/or those who have dropped out or are at risk of dropping out due to lack of connectivity. The City's FamilySource Centers, YouthSource Centers, LA Public Library and Community Based Organizations help to identify eligible students and provide wraparound services.
Illinois;\(^4\) Portland, Oregon,\(^5\) Boston, Massachusetts\(^6\) and the Texas Coalition of Cities For Utility Issues\(^7\) (“Local Governments”) file these comments to thank the 116\(^{th}\) Congress for creating the

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\(^4\) Chicago is proud to be known as the city of broad shoulders, a global, diverse city home to 77 neighborhoods and the nation’s first skyscraper, all of which the City proudly shares at https://www.chicago.gov/city/en/about/facts.html. For purposes of these comments, Chicago is most proud to be a connected community that seeks to ensure that all of its residents have the ability to connect to affordable broadband services. In the middle of the COVID-19 pandemic (June 25, 2020), the City launched “Chicago Connected,” a public-private partnership, that seeks to provide high speed internet for approximately 100,000 eligible Chicago Public Schools (CPS) families at no cost to them. The program provides internet to public school students for up to four years by directly paying for internet service for families that are most in need. Comcast, RCN, and T-Mobile are our participating providers. Eligibility is determined on an annual basis. A summary of Chicago Connected is attached hereto as Exhibit A and may be found online at https://digitalbridgek12.org/toolkit/deploy/chicagoconnected/#:~:text=Lightfoot%20announced%20the%20launch%20of,their%20home%20for%20remote%20learning.

\(^5\) Portland’s City Council unanimously adopted the Digital Equity Action Plan on April 6, 2016. The Digital Equity Action Plan (DEAP) outlines a series of operational and policy proposals for public and private agencies, along with nonprofits, in Portland/Multnomah County to advance the cause of digital equity. The DEAP Mission is to bridge the digital divide for excluded members of our community with affordable access, training and tools. More information and practical applications of the DEAP vision can be found at https://www.portlandoregon.gov/oct/73863.

\(^6\) While Boston is one of the nation’s oldest municipalities, it is a community that seeks to be on the cutting edge of science, education and digital inclusion. Boston has many firsts to its credit: the nation’s first public park, first public or state school, and first subway system. In 1799, Boston established the first board of health and the first health department in the United States with Paul Revere named as the first health officer. Boston also celebrates what it believes is the first comprehensive digital inclusion program run by any municipality in the United States: Tech Goes Home. Tech Goes Home challenges deep digital inequity by empowering community members to access and use digital tools to overcome systemic barriers and advance lives. Simply put, Tech Goes Home makes available for those that qualify and complete our training program computers, internet access, and training. Boston’s goals are to ensure that students can do homework, adults can find jobs and manage finances, seniors can connect with loved ones, linguistic minorities can learn English remotely, and all can access telehealth. A copy of Tech Goes Home Annual Report is reproduced as Exhibit B and can be visited online at https://47ab9e76-c79f-45c8-8473-ff7df2a7cd56.filesusr.com/ugd/f01914_2a3f84485cf94608bb8900b53fb40864.pdf.

\(^7\) The Texas Coalition of Cities For Utility Issues (“TCCFUI”) is a coalition of more than 50 Texas municipalities dedicated to protecting and supporting the interests of the citizens and cities of Texas with regard to utility issues. The Coalition is comprised of large municipalities and rural villages. TCCFUI monitors the activities of the United States Congress, the Texas
$3.2 billion Emergency Broadband Connectivity (“EBC”) Fund in the Consolidated Appropriations Act, 2021 (“Act”)⁸ and to offer our support, insights and pledge of assistance to the Federal Communications Commission (“Commission” or “FCC”) as it seeks to best develop and execute an EBC program to implement Congress’ vision.⁹

Congress and the FCC are to be applauded for recognizing the heightened need for affordable broadband connections and the need for access devices that make the broadband connection functional. While the COVID pandemic has shown a spotlight on the need for access to affordable broadband, local governments have consistently expressed our concerns that the digital divide exists.¹⁰ And moreover, the digital divide exists in urban America, where broadband may be available, but for many it has not been affordable.¹¹

Local Governments further file in the hope that our experiences in seeking to close the digital divide through sponsored broadband access and bulk purchases, providing connecting

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¹⁰ See Comments of NATOA (filed Jan. 25, 2021) at 2 (“Local governments are uniquely situated to contribute to the success of the Program. The availability of affordable broadband for every citizen has long been a priority for local governments. For decades, local governments have worked to prevent redlining through cable franchise agreements and, more recently, efforts to ensure the benefits of 5-G services reach every resident.”)

¹¹ Id.
equipment and training on how broadband can improve lives will prove helpful to the Commission as it seeks to best invest the billions in assistance that the Act makes possible. Local Governments also hope that the Commission will look to capture our experiences and insights so that going forward the Commission and the Universal Service Administrative Company (“USAC”) will explore better ways to distribute support in order to make broadband affordable for all Americans. We fear that for too long such programs have merely served as pass-throughs to providers.

II. ELIGIBLE PROVIDERS

Congress directed that the Emergency Broadband Benefit Program make available funding to support participating providers’ provision of certain broadband services and connected devices to qualifying households. A provider’s eligibility, as defined in the Act, is to be determined by having been designated as an eligible telecommunications carrier (“ETC”) or approved pursuant to a test to be established by the Commission.12 Local Governments offer the following suggestions regarding expanding the pool of qualified providers.

A. Cable Franchise as Proxy for Eligibility and Capability

The Notice asks “How should the Commission set up an expedited process for approving broadband providers for areas where they are not eligible telecommunications carriers?”13 The Act makes clear that the FCC is authorized to provide a wide latitude in making a broadband

12 Consolidated Appropriations Act, 2021, H.R. 133, div. N, tit. IX, § 904(a)(12), (d)(2). Specifically, the Commission is required to establish an expedited process “to automatically approve as a participating provider a broadband provider that has an established program as of April 1, 2020, that is widely available and offers internet service offerings to eligible households and maintains verification processes that are sufficient to avoid fraud, waste, and abuse.”

13 Local Governments would be interested in knowing if there are areas in the country that lack an ETC. Would not such a result be a reflection of a system flaw in ensuring that all have access to advanced services?
provider eligible for the program.\textsuperscript{14} A provider to be eligible must either be an eligible telecommunications carrier or be able to meet a four pronged test to be developed by the Commission to ensure an eligible provider “[1] … has an established program as of April 1, 2020, … [2] is widely available…, [3] offers internet service offerings to eligible households and [4] maintains verification processes that are sufficient to avoid fraud, waste, and abuse.”

Local Governments are conducting digital inclusion programs within our communities and have found partners in our local and state franchised cable operators.\textsuperscript{15} Local Governments believe these providers have already demonstrated that they can meet the Commission’s four (4) pronged test and can self-certify their eligibility. Local Governments would further note that the presence of a state or local cable franchise\textsuperscript{16} could serve as a proxy for the stability of the applicant. The existence of a franchise could be read by the Commission as a proxy for, and evidence of, the provider having been found to be technically, legally and financially capable of offering services to consumers in the area, while meeting a modicum of consumer protection and legal compliance.\textsuperscript{17}

Finally, Local Governments would recommend that any provider that is currently providing a low-cost internet access service either on their own, or as part of a public-private partnership such as Chicago Connected or Tech Goes Home, should automatically be qualified


\textsuperscript{15} The City of Los Angeles and all of the Texas communities in TCCFUI are served by state franchised cable operators. The City of Chicago has both local and state franchised providers. Boston and Portland are served by multiple cable operators with locally negotiated franchises.

\textsuperscript{16} Local Governments acknowledge that cable services are legally distinct from broadband services as currently defined by the Commission, but that has not always been the case, and the great majority of residential broadband services in this country today are provided over a cable system.

\textsuperscript{17} See generally 47 USC § 546 which outlines the test for the grant and renewal of a cable franchise.
as an eligible provider regardless of their ETC status. We would also hope that the Commission would look to see how to support efforts such as those offered by commenters, and not punish early adopters and communities that have looked to defeat the digital divide.

B. **Commission Should Explore Means to Incent Participation**

The Act is clear that participation in the program is voluntary, and a provider must affirmatively “elect” to participate.\(^1\) Still, Local Governments are worried that not enough, or not the right providers will elect to participate. We hope that the Commission will consider means to incent participation. One would think that the ability to access a multi-billion pot of funds would be incentive enough, but Local Governments will celebrate each announcement of a provider’s election to participate. We note that the trade press has not been chock full of ISPs announcing that they will participate nor that they will seek qualification under the FCC’s new certification process.

1. **Can and Should Commission Consider Participation as a Prerequisite for Continued ETC Status?**

As a means to ensure that every eligible household in America has access to at least one provider of broadband services, Local Governments suggest that the FCC examine whether continued participation in Lifeline and other Universal Service programs could be contingent upon a provider’s participation in the Emergency Broadband Benefit Program.

2. **Commission Should Ensure Only “Actual Amount Charged” Is Paid.**

Many providers today are offering a broadband connection for far less than the fifty dollar ($50) amount provided for in the Act. Local Governments request that the Commission must continue to be mindful not to allow the EBC to result in rate escalations, and to ensure that

providers do not offer one price in the competitive market and a different, and likely higher, price when seeking reimbursement from the FCC. Local Governments have been able to negotiate very competitive prices and stand ready to share that experience with the Commission.

III. ELIGIBLE RECIPIENTS

The Act provides that a household may qualify for the Emergency Broadband Benefit Program if at least one member of the household:

- meets the qualifications for participation in the Lifeline program;\(^{19}\)
- has been approved to receive benefits under the free and reduced-price lunch program under the Richard B. Russell National School Lunch Act\(^{20}\) or the school breakfast program under Section 4 of the Child Nutrition Act of 1966;\(^{21}\)
- has experienced a substantial loss of income since February 29, 2020;\(^{22}\)
- has received a Federal Pell Grant under Section 401 of the Higher Education Act of 1965\(^{23}\) in the current award year; or

\(^{19}\) 47 CFR § 54.409(a)-(b).

\(^{20}\) See 42 U.S.C. § 1751 et seq.

\(^{21}\) See 42 U.S.C. § 1773.

\(^{22}\) Consolidated Appropriations Act, 2021, H.R. 133, div. N, tit. IX § 904(a)(6)(C) (income loss must be “documented by layoff or furlough notice, application for unemployment insurance benefits, or similar . . .”). We seek comment on how to define a “substantial loss of income since February 29, 2020” and additional types of documentation that would demonstrate such a loss. Id. Should households with an income currently above a certain level be excluded from the program even if they have experienced a substantial loss of income? If so, how should that level be defined?

\(^{23}\) See 20 U.S.C. § 1070(a).
• meets the eligibility criteria for a participating provider’s existing low-income or COVID–19 program, subject to approval by the Commission and any other requirements deemed by the Commission to be necessary in the public interest.24

A. Accept Existing Certifications and the Need for Community Partners

Local Governments fear that while there are large numbers of our constituents that will qualify to participate in this program,25 we are very worried that any burdensome certification process or limited outreach program will scare many eligible parties away, or worse, that many eligible parties will never hear of the program.26

Local Governments, and our community partners, caution the Commission that it will be very challenging to connect the unconnected, even when cost is eliminated as a barrier.27 Challenges experienced in many of our digital divide programs reveal the following barriers to rolling out bulk purchases and sponsored services: (1) inaccurate contact information/difficult to reach; and (2) lack of trust for ISPs (another reason that we encourage the Commission to look for local partners that have built up relationships with the population the EBC seeks to serve). It

24 H.R. 133, div. N. tit. IX § 904(a)(6).

25 Chicago Connected has had more than 50,000 students enrolled in the first 7 months of the program and is on track to reach 100,000 students by the end of the 2020-2021 school year. But those numbers pale when compared with estimates that as many as 235,000 children might be eligible and the pool of eligible students grew by 53,000 this year. See CPS Press Release.

26 Local Governments will address this challenge in greater detail in Section VII, infra.

27 In an effort to connect the unconnected, the City of Los Angeles is working through FamilySource and YouthSource Centers, LA Public Library and Community Based organizations to identify eligible students for its Angeleno Connectivity Trust (ACT). ACT is providing 18,000 T-Mobile WiFi hotspot program. These organizations are well equipped to find students in our most vulnerable populations - students experiencing homelessness, with a disability, and who may have dropped out or at risk of dropping out due to lack of connectivity - who are eligible for the program.
is unrealistic for the Commission to believe that ISPs alone can find and connect the unconnected.

We hope that the Commission will use as a proxy any and all existing certifications that our schools, public housing and benefit organizations have already collected for the numerous federal benefit programs since Congress has identified these as qualifying criteria. For instance, the Notice asks whether the Commission should employ the United States Department of Agriculture’s (“USDA”) Community Eligibility Provisions. We respond enthusiastically yes.

For example, Chicago Connected, through the Chicago Public Schools system, Comcast, RCN, T-Mobile and 35 community-based organizations (CBOs), conducted initial enrollment of participants by reaching out to eligible households of their students that otherwise qualify for:

- Free and reduced price lunch;
- Medicaid qualifications;
- The Chicago Connected Community hardship index using the UIC Hardship Index; or are part of a

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28 Chicago Public Schools employ and are the beneficiaries of the USDA test and have not found it to result in any unjust enrichment or abuse of a benefit.

29 See Chicago Connected Fact Sheet attached hereto as Exhibit A. A list of the 35 community-based organizations partnering in sign-ups and increasing digital literacy can be found at https://cps.edu/chicagoconnected.

30 Following initial enrollment efforts, Chicago Connected currently relies on free and reduced price lunch status to determine eligibility.

31 For more information on the Hardship Index, please visit https://greatcities.uic.edu/2019/12/13/fact-sheet-chicago-community-area-economic-hardship-index-2017/.
• Special student populations such as diverse learners, English Learners and students in temporary living situations.\textsuperscript{32}

By conducting robust outreach with community partners, Chicago Connected is able to overcome the challenge of an eligible party not being aware of the program and their eligibility. Moreover, Local Governments have come to understand that the outreach program needs to involve community partners that have great credibility and existing relations with the targeted audience. For example, based on participant survey data and evaluation of Chicago Connected to date, the number one obstacle to program participation is successful outreach and clear, understandable program details that reach eligible families. Figure 1 below, from Boston’s Tech Goes Home, provides a visual on the level of outreach and partnering that such a program must have in order to bring benefits to the eligible community.

The story in Portland, Oregon is very similar. In 2014, a small group of community stakeholders met to consider how to foster increased digital inclusion in our community. This small group bloomed into Portland’s Digital Inclusion Network (DIN), a coalition of community organizations interested in raising awareness about digital equity barriers and developing solutions to bridging the digital divide. Relying on Portland’s Digital Equity Action Plan framework, the DIN continues to lead a path forward for public agencies, businesses, and community nonprofits to work together in a more efficient way. The DIN is comprised of public, ...

\textsuperscript{32} We are pleased to report that ‘Chicago Connected’ has served as a model for other cities and school districts across the country, with more than 20 cities reaching out for more information on how the program is structured and operated. Notably, the City of Philadelphia recently announced a similar effort, PHLConnectED, to connect 35,000 of its students with internet services and devices.
private, and nonprofit organizations working to raise awareness about digital equity barriers and developing solutions to bridging the digital divide.\textsuperscript{33}

Local Governments would call the Commission’s attention to the flexibility that Congress provided to you in Section 904(a)(6). The Commission is authorized to accept a participating

\textsuperscript{33} More information can be found at https://digitalinclusionnetwork.net/. The partners are identified by their contribution of WIFI Access, Internet Service Provider, Technology Classes, Technology Help, Public Computers and Low Cost Computers.
provider’s test, assuming that it is more generous than those outlined in the Act so long as the Commission deems such a test to be in the public’s interest.

1. **Commission Should Embrace Group Certification**

   The Commission should continue to employ USDA’s Community Eligibility Provision to effectively qualify an entire school or school district for the Emergency Broadband Benefit Program. While establishing large sectors of the economy for certain benefits has not been the Commission’s core mission, it has been for USDA. The Commission would not only facilitate the expedited deployment of the Emergency Broadband Benefit Program, but by employing the USDA standard, the Commission might best facilitate the ability of schools to connect with their students for remote learning.

2. **Commission Might Consider Prioritizing the Unconnected**

   Absent Commission intervention, the funding made possible by the Act could have an adverse result in that it could serve to incent ISPs to do the least amount of work possible to access these funds -- that is, subsidizing their current customers. The Commission might consider setting aside a portion of the funds to first serve the unconnected.

   Our cities could be useful, integral partners in this effort given our ability to help determine eligibility and support engagement.

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34 The Commission asks at page 7 of the Notice whether it should employ USDA’s Community Eligibility Provision to effectively qualifying an entire school or school district for this Benefit program.

35 Chicago’s Public Schools stands ready to share their experiences with the Commission as to just how important the group certification plays not only in Chicago Connected broadband program, but in bringing multiple benefits to Chicago households with school aged children.
B. Lessons Learned

1. Social Security Number is Not Required

Many of our programs have found that complex applications and the fear that the lack of a Social Security number is fatal to even the simplest of applications: lessons that we hope the Commission will take into consideration.

Chicago Connected addresses the issue of a Social Security number up front in its FAQ section, as it has come to understand the assumed need for a Social Security number serves as a deterrent to many applying for the program:

Do I need a Social Security Number to sign up?

No. There are over 30 different forms of identification that can be provided to confirm a family’s name and address, including a driver’s license, a utility bill in the applicant's name, or a current employment badge / photo ID.36

2. Past Arrears Are Seen As a Bar to Application

The Act makes clear that no participating providers may disqualify an otherwise eligible household because a “member of the household has any past or present arrearages with a broadband provider.”37 We would further hope that none of the potential providers use this as the basis to abstain from the program.38

But most households that are eligible for the Act’s benefit will be hard pressed to know that such a benefit exists, let alone that what had been a past hurdle for their family to obtain

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36 See Chicago Connected Fact Sheet attached hereto as Exhibit A.


38 Chicago Connected has obtained an agreement from partner Comcast not to disqualify from eligibility any household that has arrears.
low-cost access because of past due bills has been removed. The Commission should pay special attention to publicizing the removal of the past due hurdle.

3. Embrace Bulk Purchasers and Sponsored Services

The Commission should permit bulk purchasers of broadband services such as schools, public housing and public interests to continue to make purchases for eligible households and allow those households to assign any credit to the bulk purchaser. Likewise, the Commission should embrace the practice of sponsored services.

For instance, Chicago has both a bulk purchasing contract for hot spots with T-Mobile and sponsored service arrangements with Comcast and RCN, but the majority of the program is a sponsored service arrangement. Chicago Public Schools families sign up with Comcast or RCN to participate in the Chicago Connected program and are given a sponsor code that results in Chicago Connected covering the actual cost. Students experiencing homelessness, housing insecurity, or last mile wired service connectivity issues are alternatively given an active hot spot through Chicago’s bulk purchase contract with T-Mobile. Boston Public Schools hold a bulk purchase contract with Comcast Internet Essentials and manages the voucher process and family connection directly, while for new immigrants, seniors and public housing residents, the City contracts with Tech Goes Home to be both the purchaser and the sponsor.

For students and residents without stable housing, both Boston Public Schools and the City of Boston hold emergency bulk contracts with multiple wireless carriers and distribute the hotspots and tablets directly to the recipients.
Bulk purchasing and sponsored services of broadband connections is the basis for tens, if not hundreds, of thousands of low-income households having broadband today.\(^3^9\) By permitting the eligible household to assign their discount credit to the purchasing agent, the Commission could piggyback on existing relationships and successes.\(^4^0\) Not only would such an act by the Commission make the transition seamless, it would also allow the program to benefit from the reduced rates these bulk purchases have been able to negotiate. For instance, should the Commission authorize Tech Goes Home to obtain the Emergency Broadband subsidy, the FCC could expand the reach of the program almost fivefold, for the administrative expenses and delays are removed and the access price is one–fifth of the amount authorized by Congress.

Finally, the fact is that Congress already contemplated a role for bulk purchasers that are also eligibility proxies. Since Congress provided that such entities could serve to verify the

\(^{3^9}\) An example of a bulk program or sponsored services can be seen in Los Angeles where in October of 2020, Mayor Eric Garcetti announced a new initiative to deliver six months of free internet access to residents in four public housing communities across Los Angeles. The project is a partnership between the Mayor’s Office of Budget and Innovation, the Housing Authority of the City of Los Angeles (HACLA), Starry Internet, and Microsoft Corp. It will accelerate the availability of low-cost, high-quality broadband options in local public housing developments for nearly 3,600 units of housing and 9,000 residents. More information is available at https://www.lamayor.org/mayor-garcetti-announces-free-internet-access-residents-four-public-housing-communities.

\(^{4^0}\) Local Governments adopt the distinctions and call for actions of the National Digital Inclusion Alliance (NDIA). NDIA calls on the Commission to take all reasonable steps to encourage providers to renegotiate local, COVID-era contracts for bulk purchases of internet service for low income K-12 families and other households in need. They explain the distinctions this way: “Referred to as sponsored agreements or single payer agreements, these contracts involve a community anchor institution (such as a city or school district) or a community-based organization agreeing to pay directly for hundreds, if not thousands of internet service accounts for a year or more, so that low-income constituents can afford to participate in distance learning, telemedicine, etc. in the absence of Federal assistance. With EBC subsidies available, at least temporarily, for those same constituents (and the same providers, notably Comcast), the scarce public and philanthropic dollars committed to those contracts -- often CARES Act funds -- ought to be repurposed; for example, to extend the terms of the contracts in question for additional months or increase the speed of service being provided.”
eligibility of a household for the Emergency Broadband Benefit Program, why would one assume that Congress would object to their assistance in rolling the program out or expanding the reach of the Benefit by taking advantage of the lower bulk purchase.  

4. **Build in Notice of Funds Exhaustion and Continuity Strategies**

Local Governments are concerned with what happens when the Emergency Broadband Benefit Program’s funds are exhausted and encourages the Commission to include safeguards to try and reduce the impact of the lost service. At the very least, Local Governments encourage the Commission to institute a robust notification requirement on themselves and any eligible provider. Just as multiple communication channels will be needed to communicate the availability of low-cost offers, those same channels will be required to communicate the end of the program, or the transition to alternative support.

The Commission might consider requiring as an eligibility requirement that any provider that has a low cost programs, such as Comcast’s Internet Essentials, be required to conduct outreach and automatically convert any Emergency Broadband Benefit Program customer’s access to the provider’s low cost program. (This assumes that the EBC customer would be eligible for the low cost program.)

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42 The FCC should allow bulk eligibility partnerships with school districts, public housing authorities, tribes and similar entities. The EBC could support quick access to large populations of eligible participants by allowing public housing authorities, tribal, and other low-income housing and similar providers to either be considered as eligible providers or partner with other ISP’s to ‘turn-on’ the internet service in every unit and then run contract management with the Housing Authority or other entity. This would remove all application barriers that often interfere with individual unit households registering for the program, it would support streamlined verification and eligibility tracking, it would limit the account management for ISPs, it would allow for housing authorities or other entities to centralize communications with tenants about the service and options one the EBC ends. The FCC had a similar provision for other types of providers for Lifeline broadband, which was put on hold during the last Administration.
5. **Consider Making Program Effective As of Effective Date of Legislation**

Local Governments would suggest that the Commission consider making the EBC subsidy available as December 27, 2020, the effective date of the legislation, not when the Emergency Broadband Benefit Program is eventually rolled out. In addition to assisting families, bulk purchases and sponsors with a budgetary lift in the middle of the COVID-19 pandemic, such a move might also assist in the exit plan for when funds have been exhausted. Were the Commission to reimburse providers for services provided in January and February, or better yet, provide a two month credit for payments made in those months, the Commission could extend the program for two months for each of those eligible parties when the funds have been exhausted. In this way, the Commission would be well on its way to developing its exit strategy that we seek in our requests above.

**C. Does Reliance on Household Standard Exclude the Homeless?**

Local Governments request that the Commission ensure that reliance on the household standard does not render ineligible those that might be in a family shelter, domestic violence shelter or other temporary shelter. Local Governments request that the Commission explore ways to serve those who traditionally are not providers’ customers, such as the homeless population. In order to do so, the Commission must avoid overly restrictive requirements regarding the number of customers at a particular address by, at a minimum, ensuring that the subsidy is available to residents in such temporary housing. Creative thinking can lead to solutions. For instance, Chicago Connected serves this population by distributing wireless

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43 Section 904(a)(6)(E) provides definition of “eligible household” as a household in which “at least one member … meets the eligibility criteria for a participating provider’s existing low-income or COVID-19 program.”
hotspots. Similarly, Boston provides tablets to residents both in transitional housing and who are experiencing housing instability which the City believes does not reduce one’s need for access to broadband connectivity.

IV. MINIMUM SERVICE/SPEED AND PRICING/TECHNOLOGY AGNOSTIC

The Act provides that participating providers will make available to eligible households a monthly discount off its standard rate for an Internet service offering and associated equipment up to $50.00 per month regardless of technology.\(^{44}\) The Act further provides that participating providers will receive reimbursement from the Emergency Broadband Benefit Program for the discounts provided.

That the Emergency Broadband Benefit Program must be technologically agnostic is so each eligible recipient can use the best form of broadband access for them. For instance, in Los Angeles, the City is engaged with a fixed wireless provider to bring broadband to its public housing\(^ {45}\) and the City is partnering with T-Mobile to provide 18,000 students with hotspots for the next five years.\(^ {46}\)

A. Local Governments Request Commission Examine Ways to Pay Less for Speeds less than 25/3

Local Governments recognize that the Act makes eligible any service that is faster than dial up, so the FCC may be limited in what it can do to establish minimum speeds, but Local Governments request that speed thresholds serve to prioritize competitive offerings and that the Commission examine how it might seek to address the issue of lack of speed by limiting the size


\(^{46}\) More information on how the “Angeleno Connectivity Trust” is providing free internet service to students in Los Angeles can be found at [https://www.lamayor.org/Connectivity](https://www.lamayor.org/Connectivity).
of the benefit available to the provider. Moreover, we note that the Commission states in the Notice that devices must be sufficiently robust to support video platforms for distance learning. Local Governments believe that the identical test should be employed for the service the device will be using. Local Governments would go further and call for the Commission to establish a speed of service that is sufficient to also support multiple, simultaneous video conferencing platforms for the benefit of households with more than two children in remote learning and caregivers/parents in remote work.

B. Local Governments Support Commission’s Plans on Discounts

Local Governments believe that both the Act and the Commission contemplate running the Emergency Broadband Benefits Program so as to avoid windfalls for the industry at the expense of the number of eligible households serviced. Local Governments merely wish to voice our support and agreement for same.

a. Providers should have to honor all existing discounts. Such discounts have proven to be sufficient compensation previously, and any savings preserved allow additional beneficiaries of the program.

b. Eligible participants should have access to any existing discount as of the effective date of the program. Funds should be available as a credit at the end of the program or be permitted to be applied to purchase of equipment at the discretion of the participant.

c. Bulk purchasing and pricing, especially for public housing, should be protected.
V. EQUIPMENT

The Act provides participating providers may receive up to one-hundred dollars ($100.00) for the purchase price of a single connection device per eligible household.\textsuperscript{47} The Act further clarifies that the device may be a laptop, desktop computer, or tablet, but not a phone, and providers must submit certifications of capabilities and delivery to the Commission in order to receive any such reimbursement.\textsuperscript{48}

Finally, the Commission has determined that for any device to be eligible for reimbursement, it must be capable of supporting distant learning.

Because of the shortness of the comment cycle, Local Governments will not address the Commission’s questions regarding equipment in any greater detail other than to applaud the Commission’s preliminary determinations as to the distance learning capabilities of the equipment.

In our Reply Comments, we will offer the Commission greater insights into our experience with the device component of our program.

\textsuperscript{47} Consolidated Appropriations Act, 2021, H.R. 133, div. N, tit. IX § 904(b)(5).

VI. PARTNERING IS THE ONLY WAY TO SUCCEED AND THE WHEEL DOES NOT CONTINUALLY NEED TO BE REINVENTED

Portland’s digital divide experience makes clear that program elements such as digital literacy programs, services and training tools already exist and are available, but those facts were not known by Portland’s partnering community-based organizations (CBO) and the marginalized and vulnerable populations. Portland, therefore, took on the role of creating a searchable directory of digital inclusion assets such as training classes, free WiFi locations, free or low-cost computer resources, public computing centers, and tech support for those that were not aware of what was available, how to best use these resources, and how to connect to services. CBOs can continue to interact with residents to help them with education, employment, voting, citizenship, housing, legal and health services while Portland supports their efforts with this directory of resources available for all to use.49

The Portland partnering experience is one that is repeated in every one of the commenting communities, and we would assume that such success through partnering has been the experience throughout the nation.50 Local Governments commend this approach to the Commission and in Section VII, hope to outline how local governments and local government agencies can best serve the effort.

49 More information and details regarding this effort may be found at https://digitalinclusionnetwork.net/about and https://www.portlandoregon.gov/oct/article/765968.

50 The City of Los Angeles in partnership with the California Emerging Technology Fund and EveryoneOn is helping Angelenos find options for low-cost internet services, access to computers, and digital literacy services. The webpage allows an individual to search for services by entering one’s zip code. Visit https://getconnectedlosangeles.lacity.org/ to see the wide array of services available. But as discussed more in Section C, these types of tools only work if a recipient is aware of the portal and has access to it. That is why Los Angeles and others are looking to alternative messaging strategies.
VII. ADVERTISING/AWARENESS –

A. The Need to Market -- Just Because You Build It, Does Not Mean Eligible Parties Will Know About It, Let Alone Sign Up

Communities across the nation have sought to roll out low-income broadband access programs, and the greatest challenge faced by all has been 1) ensuring that eligible parties are aware of the programs existence and 2) having those eligible parties register for the benefit. Local Governments therefore applaud and adopt the insights shared with the Commission by a collection of Public Interest groups. The FCC must appreciate that this is a marketing challenge as much as it anything and that in local governments and PEG access programming providers across the nation, the Commission has ready and willing partners.

The FCC can ensure eligible individuals are notified by allocating a portion of the administrative funds to marketing campaigns through a diverse set of media outlets targeting all eligible participants and minority audiences. The groups recommended working with state and local agencies, governments, and non-profit organizations that have assisted with or provided pandemic relief, encouraging them to pass information along to ensure potential qualifying candidates receive notification of the emergency broadband relief program.  

B. Local Elected Officials Would Be the Broadband Benefits Greatest Cheerleaders

Recent relations between the FCC and local government officials have been strained at best, but the potential benefits offered by the Emergency Broadband Benefit Program will find local officials only too willing to assist. Mayors, city councilors as well as school superintendents will trumpet the potential of the program as they are faced with delivering

education and local government services in a socially distant manner. That can only be done if local government constituents are able to access online services. All the Commission has to do is ask and provide a uniform script to ensure the message is consistent.

C. \textit{Local Governments and PEG channels are Partners in Waiting to Market the Program.}

Many eligible parties are not online to view ‘website’ communications of low-cost connectivity offers. With libraries being closed during the pandemic, those without a computer may not be online regularly to receive the information. Like local governments, the FCC must explore alternative means of communication.

During the beginning of the pandemic, the City of Los Angeles launched a website to share low-cost internet offers from the providers, and also realized that the messaging needed to go across many channels to reach the intended audience. As such the City used its local PEG channel, social media, and the school district’s TV channel to carry the messaging.

Public access cable channels have rarely been considered essential\textsuperscript{52}—that is until the COVID-19 pandemic disrupted every facet of public life. Often lampooned or ignored, these channels have offered informational lifelines to more than 3,000 U.S. communities desperate for local news, high school graduations, religious services, entertainment, and education. Their performance in the crisis underscores the potential for hyperlocal media, as well as the need for regulatory structures that bolster open society.

A survey conducted by the American University’s School of Communications Center for Media & Social Impact titled, “PEG ACCESS MEDIA: LOCAL COMMUNICATION HUBS

\textsuperscript{52} Many coastal communities would challenge this statement as PEG channels have long been a source of information in the run up to natural disasters.
IN A PANDEMIC”\textsuperscript{53} documents how in the COVID-19 pandemic, communities across the U.S. have come to depend on their public, educational and governmental (PEG) access operations for crucial information of importance locally, and not just the news.

PEG media services are increasingly providing technical operations support for local governments and schools districts, and are serving as platforms for community events. PEG channels are providing detailed local information and updates on COVID-related news and data to their residents, as well as hosting distance learning opportunities for their schools. The Commission should consider how it might include a PEG component into its marketing program.

**VIII. CONCLUSION**

Congress and the FCC are to be applauded for acknowledging and funding efforts to close the digital divide. These efforts will be more successful if:

- The Commission adopts and incorporates the lessons and insights that Local Governments\textsuperscript{54} and our community partners have sought to share in these comments; and

\textsuperscript{53} Patricia Aufderheide, Antoine Haywood, Mariana Sánchez Santos, PEG ACCESS MEDIA: LOCAL COMMUNICATION HUBS IN A PANDEMIC, Center for Media & Social Impact, School of Communication, American University (August 2020) available at https://cmsimpact.org/report/peg/.

\textsuperscript{54} In addition to our ideas, local governments also bring a credibility to this project. A recent Gallup poll from August-September 2020, found that local governments are the most trusted of government entities included in the poll, with 71 percent of Americans saying they trust it a great deal or fair amount (https://news.gallup.com/poll/321119/trust-federal-government-competence-remains-low.aspx) (site last visited Jan. 22, 2021).
• The Commission accepts our offers of assistance to reach the unconnected.

Respectfully submitted,

/s/ Gerard Lavery Lederer
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BEST & KRIEGER LLP
(202) 370-5304; Cell: (202) 664-4621
1800 K Street N.W., Suite 725
Washington, DC 20006

January 25, 2021 Counsel for the Local Governments
About the Program

- Launched on June 25, 2020, Chicago Connected is a public-private partnership designed to provide high speed internet for eligible Chicago Public Schools (CPS) families at no cost to them.
- The program will provide internet for approximately 100,000 CPS students for up to four years by directly paying for internet service for families that are most in need. Comcast, RCN, and T-Mobile are the participating providers. Eligibility will be determined on an annual basis.

How it Works

- Families are notified of eligibility by CPS via letter, e-mail, and text message containing a code to activate services.
- Families can visit cps.edu/getconnected or contact their local school to check if they are eligible.
- With general program questions or assistance with CPS remote learning guidance or devices, families can call CPS at (773) 417-1060.
- Wi-Fi:
  - Signing up is easy -
    - Comcast: Call (844) 963-0178 or visit InternetEssentials.com
    - RCN: Call (312) 955-2400
  - Signing up for Wi-Fi requires a form of ID, redemption code from CPS, and address. A Social Security Number is not required -- over 30 different forms of ID are accepted.
  - Once signed up, the provider will ship equipment with instructions to set up and activate Wi-Fi. If needed, professional installation support is available upon customer request.
  - Chicago Connected families with an existing low-cost Internet package with Comcast will have the option to transition to Chicago Connected, if they choose.
- Hotspots:
  - Students in temporary living situations are eligible for a hotspot.
  - Students can request a hotspot by calling their principal. An address is not required.
  - Chicago Connected will also extend existing hotspot service through T-Mobile for students in temporary living situations for up to four years.

Frequently Asked Questions

When can I sign up?

As soon as you receive an activation code, you can sign up immediately.

Do I need a Social Security Number to sign up?

No. There are over 30 different forms of identification that can be provided to confirm a family’s name and address, including a driver’s license, a utility bill in the applicant's name, or a current employment badge / photo ID.
Do I need a background or credit check to sign up?

No. Families who sign up do not undergo a background or credit check.

**Additional Information**

- 35 community-based organizations (CBOs) are responsible for facilitating program sign ups and increasing digital literacy in their neighborhoods. A list of participating CBOs can be found at [cps.edu/chicagoconnected](http://cps.edu/chicagoconnected).
- CBOs, CPS staff and principals, and Comcast are conducting outreach to inform households that they are eligible and help them sign up.
- Households with outstanding debt owed to Comcast are eligible for Chicago Connected.
- Families who enroll will receive a digital welcome packet, including technical and digital literacy support materials from Chicago Connected.

**Eligibility**

Household eligibility for Chicago Connected is determined using a weighting of factors including:

- Free and reduced price lunch status
- Medicaid qualifications
- Community hardship index using the [UIC Hardship Index](http://uichardshipindex.org)
- Special student populations such as diverse learners, English Learners and students in temporary living situations

CPS is partnering with community-based organizations to conduct direct outreach to families. You can also check if your family is eligible by going to [cps.edu/getconnected](http://cps.edu/getconnected).

**Funding**

- Chicago Connected is funded through a public-private investment. The program is estimated to cost approximately $50 million over the next four years, prioritizing families in need on the City’s South and West Sides.
- Core partners:
Impact Report
2020
Our Work

In the face of deep digital inequity, Tech Goes Home empowers communities to access and use digital tools to overcome systemic barriers and advance lives. Simply put, we bring computers, internet, and training to those without so students can do homework, adults can find jobs and manage finances, seniors can connect with loved ones, and all can access telehealth.

TGH partners with community assets such as schools, libraries, and community centers to run our 15-hour digital skills training courses.

* Active in the Past 12 Months.

Our Mandate

2020 brought enormous challenges to the communities that Tech Goes Home serves throughout Greater Boston.

Already facing systemic injustice, our communities are navigating unprecedented new challenges created by COVID-19 that disproportionately impact people of color and low-income households.

The pandemic underscored just how significant a burden digital exclusion continues to place on the many families who remain without the internet access, digital devices, or digital skills necessary to access critical resources like education, work and healthcare from home. These tools are essential to helping adults find jobs, empowering students to achieve, seniors to access critical health services and connect with loved ones, and people of all ages to participate in civic life.

In 2020, in response to skyrocketing demand as a result of the pandemic and associated stay-at-home orders, we worked in collaboration with over 150 community-based partner sites and 300 instructors throughout the city to build out an entirely virtual learning model, and shift our courses to meet the needs of our learners.

We updated and expanded our education courses to focus on remote learning and help nearly 1,200 students access and excel at remote schoolwork. We developed new resources to ensure that more than 2,500 of our learners could access essential resources such as remote grocery and prescription delivery, telehealth, and benefits, from home. We ramped up our professional development and workforce training courses to help more than 500 unemployed learners apply for jobs from home and find new opportunities in the workforce.

We are constantly inspired by our learners, who are wonderful and resilient, and are proud of the work we did this year to serve as many people as our resources allowed. But there is so much work left to do.

We look forward to continuing our work to remove the systemic barriers that lead to digital inequity, and empower individuals and families throughout Greater Boston to access the enormous opportunities provided by the digital world.
Tech Goes Home works with people of all ages, living in communities throughout Greater Boston. Our programs serve those without the means to connect to and engage with the online world at home, and focus on people and communities who face systemic barriers to technology adoption including individuals who are un- or under-employed, are from low-income households, have limited English proficiency, or are living with disabilities.

“I learned how to create a presentation in Google Slides, which I am able to put into real life practice when I’m teaching my students online. Without the skills that TGH teaches, your opportunities for personal and professional growth are limited. TGH opens a world filled with knowledge and skills that are crucial to have in the 21st century.” — Yvonne, TGH Community Graduate, October 2019
Our Impact

**Removing Barriers to Academic Achievement**
At a time when access to virtual learning is more important than ever, Tech Goes Home’s programs provide students and their families with the essential digital resources and training that remove barriers to pursuing academic achievement.

<table>
<thead>
<tr>
<th>Our learners reported that, as a result of TGH programs:</th>
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<tbody>
<tr>
<td>755 Students’ grades improved</td>
</tr>
<tr>
<td>864 Caregivers are more involved with their children’s education</td>
</tr>
<tr>
<td>1,156 Students are better able to do schoolwork online</td>
</tr>
<tr>
<td>1,655 Children use their TGH device for learning multiple times a week</td>
</tr>
</tbody>
</table>

“Many of our students were trying to complete college applications and writing their college essays on their phones. It has made a huge difference for our students to have devices at home to be able to work on their applications at their own pace.” — TGH Community Instructor, June 2020

**Empowering Economic Mobility**
Tech Goes Home’s programs provide adults with tools, access, and skills training that open up pathways for job opportunities that require digital skills.

<table>
<thead>
<tr>
<th>Our learners reported that, as a result of TGH programs:</th>
</tr>
</thead>
<tbody>
<tr>
<td>167 Entrepreneurs started a business</td>
</tr>
<tr>
<td>235 Adults got a better job</td>
</tr>
<tr>
<td>268 Jobseekers entered a work training program</td>
</tr>
<tr>
<td>568 Graduates who were unemployed at the beginning of the TGH course found jobs or became full-time students after taking the course</td>
</tr>
</tbody>
</table>

“TGH was the best experience of my life. It made me change my career. I am now a student in college training to be a PC Engineer!” — Kewanee, TGH School Graduate, November 2019

“I learned how to create a budget using a spreadsheet. This helps me keep track of and evaluate the productivity of my business. I feel more proficient and my business is thriving.” — Cindy, TGH Small Business Graduate, March 2019
Our Impact

Driving Community and Family Engagement

Through Tech Goes Home, learners form connections with members of their community while learning skills such as communicating via email, accessing community health resources, completing the census, and registering to vote.

Our learners reported that, as a result of TGH programs:

<table>
<thead>
<tr>
<th>2,531</th>
<th>2,569</th>
<th>2,790</th>
<th>3,015</th>
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<tbody>
<tr>
<td>Graduates use their device and skills for their health and wellness</td>
<td>Residents use their technology and skills to access city resources</td>
<td>Adults made new connections or friends</td>
<td>Graduates use their technology and skills to communicate with others via email or videocall</td>
</tr>
</tbody>
</table>

“"I learned how to use the computer to help my child in school. Having a computer during this pandemic has been a blessing." — Conroy, TGH Community Graduate, September 2020

“"I gained more confidence in my computer skills. As a paraprofessional, my goal was to be able to assist students and teachers better and I accomplished that in my TGH course." — Noreen, TGH Community Graduate, May 2020

COVID-19 Impact Data

COVID-19 brought unprecedented challenges to the communities we serve. The ability to work, learn, and access critical resources from home has never been more important, and in 2020 we pivoted our programs to ensure we could continue to serve our existing learners, and meet the needs of new ones.

We moved our entire operation completely online with our new Distance Learning model, formed new partnerships to increase telehealth access, launched a webinar series, produced video tutorials, and compiled a COVID-19 resource page.

“"A learner's daughter got COVID-19 and was having issues of housing and job discrimination because of it. The learner and I met after class one day and I reviewed the different resources we had gone over and how they could help her out. She told me later on that it gave her confidence to fight and now the DOJ is involved helping her." — TGH Community Instructor, May 2020
“These courses and devices are making a huge difference in the lives of many immigrant adults and families, seniors, and school children in Revere. Now that technology is used in all the schools, many low-income families are struggling to provide technology devices and parental control of what their children are watching online. This program is making this possible for many of the families and seniors in need.” — TGH School Instructor, February 2020

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