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COMMENTS OF THE MULTICULTURAL MEDIA, TELECOM AND INTERNET COUNCIL AND NATIONAL URBAN LEAGUE

The Multicultural Media, Telecom and Internet Council (MMTC) and the National Urban League (NUL) (collectively, the “Civil Rights Commenters”) respectfully submit these comments in response to the Commission’s January 4, 2021 Public Notice addressing the implementation of the Emergency Broadband Benefit (“EBB”) Program established by the Consolidated Appropriations Act.¹

INTRODUCTION AND SUMMARY

Access to broadband connectivity has become increasingly fundamental to daily life. Yet too many Americans lack broadband access or have insufficient service at home, and the COVID-19 pandemic has further exacerbated the digital divide and increased the need for widespread and affordable access to broadband services. Low-income families and communities of color, especially, have an urgent and dire need for affordable, robust, and reliable broadband connectivity. Without immediate access to high-quality broadband services, the homework gap—as described by Acting Chair Rosenworcel²—will continue to increase, the digital divide will become more pronounced, the retooling of America will be thwarted, and low-income families and communities of color will continue to suffer disproportionately as access to vital online services, and the ability to participate in critical economic, social, and civic activities, are increasingly out of reach.

¹ Public Notice, *Wireline Competition Bureau Seeks Comment on Emergency Broadband Connectivity Fund Assistance*, DA 21-6, WC Docket No. 20-445 (rel. Jan. 4, 2021) (“Public Notice”).

² Statement by Commissioner Jessica Rosenworcel, *Lifeline and Link Up Reform and Modernization et al.*, DA 16-714, WC Docket Nos. 11-42, 09-197, and 10-90, (rel. June 22, 2016), available at <https://www.fcc.gov/ecfs/admin/filings/062287225177/document/0622872251774f32>.

The \$3.2 Billion Emergency Broadband Benefit Program offers a vital opportunity to mitigate the harmful impacts of the COVID-19 pandemic on broadband access and digital equity for low-income households. To be sure, substantially more funding will be required to ensure universal and affordable access to broadband for all Americans, but the Civil Rights Commenters applaud Congress for establishing the EBB and the Commission for promptly seeking input on implementing this critically needed program. We urge the Commission to work expeditiously to distribute the available funds to as many low-income families as quickly as possible, ensuring that they have access to the full range speeds and usage allowances that are available to them with the EBB. In doing so, the Commission should adopt a human-centered framework for the program, focused on providing high-quality service to as many low-income households as possible.

As described below, achieving this vision will require the Commission to adopt broad and flexible eligibility criteria; make certain that eligible households have access to robust wired and wireless broadband services with sufficient speeds and usage allowances; commit resources to making eligible households aware of this new funding; and track results. In addition, the Commission must ensure that its adoption of measures to prevent waste, fraud, and abuse—which the Public Notice emphasizes repeatedly—does not undermine the equally (if not more) important interest in ensuring that low-income households and service providers can participate in the EBB Program without excessive red tape or other burdens. The tremendous promise of the EBB Program will be realized only if the application process is streamlined and eligibility verification requirements and other rules are easily administrable.

DISCUSSION

I. ENSURING UNIVERSAL, AFFORDABLE BROADBAND ACCESS IS A CRITICAL AND URGENT CIVIL RIGHTS CHALLENGE

Broadband Internet access is unquestionably essential, yet a significant number of Americans—especially people of color and those struggling with low income—are disconnected from the Internet. Over 34 percent of Black and Latinx adults,³ and nearly one in five Native Americans who reside on a reservation,⁴ do not have home broadband. Relatedly, over 31 percent of Black, Latinx, and Tribal families lack high-speed home Internet.⁵ Likewise, over 44 percent of families that earn less than \$25,000 annually and over 30 percent of families that earn between \$25,000-50,000 annually lack high-speed home Internet access.⁶ Our elderly population is also negatively impacted, with 41 percent of elderly people lacking home broadband connectivity.⁷

This digital divide serves as a structural barrier to advancement generally, and in the face of the COVID-19 crisis, its adverse impacts are even more profound, as people now must rely on the Internet for so many core aspects of their daily lives, including work, education, and obtaining

³ *Internet/Broadband Fact Sheet*, PEW RESEARCH CTR., available at <https://www.pewresearch.org/internet/fact-sheet/internet-broadband/> (showing that 21% of White adults, 34% of Black adults, and 39% of Latinx adults do not have home broadband) (last updated June 12, 2019).

⁴ Avi-Asher Schapiro, *Coronavirus Crisis Threatens Internet Opportunity for Native Americans*, REUTERS (July 27, 2020), available at <https://www.reuters.com/article/us-health-coronavirus-usa-rights-trfn/coronavirus-crisis-threatens-internet-opportunity-for-native-americans-idUSKCN24T06B>.

⁵ John B. Horrigan, *Students of Color Caught in the Homework Gap*, ALLIANCE FOR EXCELLENT EDUC., available at <https://futureready.org/homework-gap/> (last visited Jan. 17, 2021) (showing that 30.6% of Black, 31.2% of Latinx, and 34.2% of American Indian/Alaska Native families lack high-speed home internet, compared to 20.9% of White families).

⁶ *Id.* (showing that 44.5% of families that earn less than \$25,000 and 32.2% of families that earn between \$25,000-50,000 lack high-speed internet).

⁷ *Internet/Broadband Fact Sheet*, *supra* note 3 (defining “elderly” as all persons 65 years of age or older).

healthcare and other vital services. Because of the pandemic, the number of Americans working from home full-time has dramatically increased, from 5.2 percent⁸ in 2017 to 42 percent in 2020.⁹

Additionally, nearly 93 percent of households with school-age children participate in some form of distance learning, but lower-income households are less able to rely on online resources.¹⁰ Nearly 17 million children are unable to participate in remote learning because their families lack broadband access, and nearly 9 million Black and Latinx children in particular lack high-speed Internet access.¹¹ These data points show that simply obtaining access to minimal broadband service (such as a single mobile phone per household) is not remotely sufficient to bridge the homework gap—children must receive high-quality broadband services with sufficient speeds and usage allowances to meet their educational needs.

Since the onset of the COVID-19 crisis, reliance on telehealth services has skyrocketed, increasing from 11 percent to 46 percent of Americans participating.¹² Healthcare providers have reported seeing 50-175 times more patients via telehealth than before the pandemic.¹³

⁸ Dan Kopf, *Slowly but Surely, Working at Home is Becoming More Common*, QUARTZ (Sept. 17, 2018), available at <https://qz.com/work/1392302/more-than-5-of-americans-now-work-from-home-new-statistics-show/>.

⁹ May Wong, *Stanford Research Provides a Snapshot of a New Working-From-Home Economy*, STANFORD NEWS (June 29, 2020), available at <https://news.stanford.edu/2020/06/29/snapshot-new-working-home-economy/>.

¹⁰ See Kevin McElrath, *Nearly 93% of Households with School-Age Children Report Some Form of Distance Learning During COVID-19*, U.S. Census Bureau (Aug. 26, 2020), available at <https://www.census.gov/library/stories/2020/08/schooling-during-the-covid-19-pandemic.html> (“Lower-income households are less likely than higher-income ones to have internet access and computer availability.”).

¹¹ Horrigan, *supra* note 5.

¹² Oleg Bestsenny et al., *Telehealth: A Quarter-Trillion-Dollar Post-COVID-19 Reality?*, McKinsey & Co. (May 29, 2020), available at <https://www.mckinsey.com/industries/healthcare-systems-and-services/our-insights/telehealth-a-quarter-trillion-dollar-post-covid-19-reality#>.

¹³ *Id.*

Furthermore, the pandemic has created additional challenges with connecting underserved communities that the Commission should consider in its launch of the EBB Program, including historically high unemployment rates¹⁴ and evictions.¹⁵

As set forth below, in seeking to address these critical challenges, the Commission should be guided by a human-centered approach in administering the EBB Program that maximizes the value of the available funding.

II. THE COMMISSION CAN TAKE IMPORTANT STEPS TO MAXIMIZE THE VALUE OF EBB SUPPORT AND THEREBY REDUCE THE DIGITAL DIVIDE

A. The Commission Should Define EBB Eligibility Broadly To Maximize Participation by Low-Income Persons and People of Color.

To ensure that the EBB Program maximizes participation by low-income households, the Commission should establish flexible eligibility criteria. The statute authorizes participation by applicants that (1) are approved via the National Verifier and the National Lifeline Accountability Database (“NLAD”); (2) rely on a school to verify participation in the free and reduced-price lunch program or school breakfast program; or (3) otherwise satisfy an approved service provider’s eligibility verification process.¹⁶ Accordingly, the Commission has flexibility to authorize eligibility standards beyond those utilized by NLAD and schools, and should encourage participating providers with their own low-income programs to cast a wide net in defining eligibility criteria.

¹⁴ GENE FALK ET AL., CONG. RESEARCH SERV., R46554, UNEMPLOYMENT RATES DURING THE COVID-19 PANDEMIC: IN BRIEF (2021) (showing that unemployment reached 14.8% in April and declined to a still-elevated level of 6.7% in December); *see also* Emily Benfer et al., *The COVID-19 Eviction Crisis: An Estimated 30-40 Million People in America are at Risk*, ASPEN INST. (Aug. 7, 2020), available at <https://www.aspeninstitute.org/blog-posts/the-covid-19-eviction-crisis-an-estimated-30-40-million-people-in-america-are-at-risk/> (showing that nearly 50 million Americans filed for unemployment insurance as of July 2020).

¹⁵ Benfer et al., *supra* note 14 (showing that 30-40 million Americans are at risk of eviction in the next several months).

¹⁶ *Public Notice*, *supra* note 1, at 7.

The COVID-19 pandemic has caused catastrophic job loss. Millions of Americans who were once gainfully employed no longer have the means to support themselves and their families.¹⁷ While some of these families may not fall below the federally defined poverty line, nearly two-thirds of the population will run out of savings in the near future.¹⁸ Accordingly, the Commission should expand the eligibility criteria to include families who do not qualify under NLAD, but are nevertheless suffering due to COVID-related job loss.

Additionally, undocumented families should be eligible to receive funding. Undocumented families are a part of the fabric of this country, and deserve affordable access to quality Internet services. Many undocumented families who cannot get a social security number nonetheless pay taxes via an Individual Taxpayer Identification Number (ITIN),¹⁹ and the Supreme Court has held that undocumented students have the same right to attend public primary and secondary schools as citizens.²⁰ Due to the pandemic, the safest way—and often the only way—for school children to obtain public education is through the use of remote learning. As a result, undocumented children need access to robust and reliable broadband services at home to participate. To facilitate such participation, the Commission should explore mechanisms (both within NLAD and in connection with service providers’ own programs) to verify eligibility without using a Social Security number.

¹⁷ Benfer et al., *supra* note 14.

¹⁸ Alexandria White, *61% of Americans Will Run Out of Emergency Savings by the End of the Year—Here’s How to Reduce Expenses Now*, CNBC (Nov. 19, 2020), available at <https://www.cnbc.com/select/americans-running-out-of-emergency-savings-in-2020/>.

¹⁹ See <https://www.irs.gov/individuals/international-taxpayers/taxpayer-identification-numbers-tin#itin>.

²⁰ *Plyler v. Doe*, 457 U.S. 202, 221 (1982) (“[E]ducation has a fundamental role in maintaining the fabric of our society. We cannot ignore the significant social costs borne by our Nation when select groups are denied the means to absorb the values and skills upon which our social order rests.”).

In addition, the pandemic has displaced many individuals and families from their homes, as unemployment and other factors have made it difficult to keep up with rent payments. Accordingly, the Commission also should explore how to provide services for transient and homeless populations, such as providing wireless broadband (e.g. hotspots). The pandemic has also caused a rise in multi-generational and multi-family homes,²¹ resulting in an increase in the number of people that require broadband services under one roof. Assuming it is not feasible in the context of this emergency funding program to broaden the definition of “household” used in the Lifeline program, the Commission should undertake a proceeding to consider expanding that definition to enable a broader group of individuals to benefit from broadband subsidies in the home.

B. The Commission Should Promote Access to Robust Broadband Services That Are Fully Capable of Meeting the Needs of Low-Income Households.

Once consumers are enrolled, it is imperative for the Commission to ensure that the program supports robust broadband connectivity that meets or exceeds the FCC’s official definition of broadband, and that can support a typical family’s critical needs relating to work, education, and telehealth, along with the myriad of other online activities in which many families engage.

The Lifeline program has delivered important benefits to millions of low-income households, but the limited federal subsidy (\$9.25 per month) means that Lifeline customers often receive services with subpar speeds and meager usage allowances. The Commission has sought to address these concerns by imposing mandatory minimum Lifeline speeds and usage allowances,

²¹ See Carmen Reinicke, *For Families with Multiple Generations Under One Roof, the Pandemic has Brought Unique Challenges*, CNBC (Nov. 30, 2020), available at <https://www.cnbc.com/2020/11/27/covid-19-brought-unique-challenges-for-multigenerational-families.html> (“The coronavirus pandemic has brought economic hardship and pushed many relatives to live together.”).

but those have since been watered down in the face of objections and legal challenges.²² Leading industry low-cost broadband programs, generally offer more robust connectivity and more generous usage allowances than Lifeline programs, and at reasonable rates.

Congress's authorization of a \$50-per-month subsidy for broadband access (\$75 in Tribal areas), together with up to \$100 for a connected device, creates an unprecedented opportunity to deliver robust broadband connectivity to millions of low-income families in need. Such consumers deserve the same high-quality services that are available to subscribers of greater means. Indeed, bridging the digital divide, and lifting families out of poverty, depend on ensuring that low-income households are not consigned to second-class services and have more choices.

As discussed below, one important way to enable low-income consumers to have a choice between Lifeline plans traditionally offered by eligible telecommunications carriers ("ETCs"), and high-value broadband offerings offered by ISPs with well-regarded low-income plans (that are now subject to automatic approval) is to make the funding immediately available for both. To make these choices meaningful for low-income consumers, the Commission and USAC should make sure that low-income consumers are made aware that the EBB can be used to offset the cost of higher-prices broadband plans, and is not limited to merely offsetting the costs of low-cost broadband plans (at least until the EBB funding runs out).

C. Participating Broadband Providers Should Be Approved on a Streamlined Basis and Should Be Required to Promote the Availability of EBB Support.

1. The Commission should expedite review and approval of eligible providers.

Congress appropriately determined that broadband providers that are not designated as a ETCs are eligible to participate in the EBB Program, and that service providers with widely

²² See *Lifeline and Link Up Reform and Modernization et al.*, Order, 34 FCC Rcd 11020 (2019).

available low-income programs (as of April 1, 2020) should be “automatically approve[d].”²³ The Commission should avoid creating burdens in the application process and should expedite its review and approval to ensure that as many ISPs participate in the EBB Program as quickly and as widely as possible, as Congress intended.

Low-income households seeking prompt access to EBB-supported services should be able to immediately choose from a range of potential providers, offering both wireline and wireless broadband solutions. The presence of multiple, competing services providers will lead to higher levels of service and better choices for low-income consumers to subscribe to broadband plans that support the household needs (rather than plans that are inadequate for the needs of their households).

For these reasons, the Commission should prioritize the expedited approval of ISPs that had low-income programs in place as of April 1, 2020, so as to make sure that eligible consumers have immediate access to as many broadband service options as possible.

2. ***The Commission should require ISPs to promote awareness of the EBB Program.***

As emphasized by Commissioner Starks, the goal of the EBB Program is to “reach more low-income people than any previous FCC effort to close the digital divide.”²⁴ To do so, eligible

²³ *Public Notice*, *supra* note 1, at 2. See Letter of MMTC et al., *Restoring Internet Freedom*, WC Docket No. 17-108, and *Lifeline and Link Up Reform and Modernization*, WCB Docket No. 11-42 (Apr. 17, 2020); see also Press Release, Marcella Gadson, *MMTC Supports Congressman Butterfield’s ‘Expanding Opportunities for Broadband Deployment Act’ to Expand Access to Universal Service Fund Subsidies*, MMTC ONLINE (June 12, 2020), available at <https://www.mmtconline.org/wp-content/uploads/2020/06/MMTC-Press-Statement-Butterfield-Expanding-Opportunities-for-Broadband-Deployment-Act-061220.pdf> (“[Suspending the ETC eligibility requirement] is especially necessary amid the nation’s current crisis where over 44 million Americans have filed for unemployment, 55 million students are at home, and 27 percent of U.S. adults do not have the home broadband connections their households need to access education, employment, telehealth, civic engagement, and more.”). As the Commission considers additional low-income support programs going forward, it should explore forbearance from ETC requirements to maximize participation by broadband providers.

²⁴ *Statement by Commissioner Starks, Commissioner Geoffrey Starks Encourages Robust Participation in Emergency Broadband Benefit Comment Period*, Press Release, FCC (Jan. 4, 2021), available at <https://docs.fcc.gov/public/attachments/DOC-369050A1.pdf>; see also *Rev. Al Sharpton, Geoffrey Starks, Vanita*

households must be made aware that the EBB funding exists. Therefore, it is critical that the Commission require participating ISPs to advertise the services that will be available to EBB-supported households and otherwise promote awareness of the EBB Program. This can be done in a way that does not incur additional regulatory obligations (that might deter participation in the program) beyond those already in place. The Commission should consider providing baseline messaging for eligible providers to use when advertising the EBB Program, to promote a standardized understanding of the program, and the attributes of each offering in order to allow customers to make clear and informed choices. The Commission should create a comparison chart of what speeds work for what size households or uses so that there is an official table of comparison to help households make decisions on what they need. Similarly, the Commission should require providers to develop clear messaging on the functionality of their EBB-supported services. This will foster a greater understanding of the available options and allow eligible households to choose the services that best fit their needs.

In addition to requiring ISPs to advertise their eligible services throughout their service territories, the Commission should undertake its own public awareness campaign. For example, the Commission (in partnership with stakeholders including the Civil Rights Commenters) should use televised public service announcements and other outreach mechanisms and work with faith communities, minority-owned broadcasters,²⁵ civil rights organizations, local community action

[Gupta, Marc Morial, and Maurita Coley, *Broadband Access is a Civil Right We Can't Afford to Lose—But Many Can't Afford to Have*, ESSENCE](https://www.essence.com/news/broadband-access-is-a-civil-right-we-cant-afford-to-lose-but-many-cant-afford-to-have) (June 17, 2020) available at <https://www.essence.com/news/broadband-access-is-a-civil-right-we-cant-afford-to-lose-but-many-cant-afford-to-have> (calling on Congress to enact a robust connectivity plan sufficient to address the immediate and future needs of marginalized communities).

²⁵ As early as 1978, the Commission has recognized that minority ownership of broadcast stations “foster[s] . . . inclusion” and “results in a more diverse selection of programming.” *Statement of Policy on Minority Ownership of Broadcasting Facilities*, Public Notice, 68 FCC2d 979, 983 (May 25, 1978). The Commission has continued to affirm the importance of minority-owned broadcasters. See Commissioner Geoffrey Starks, Remarks at the National Association of Broadcasters Board of Directors (Jan. 27, 2020), available at <https://docs.fcc.gov/public/attachments/DOC-362128A1.pdf> (stating that diversity in ownership matters because

organizations, and others to educate low-income persons and people of color about program benefits, eligibility requirements, and the application process. In particular, the Commission, USAC, and other stakeholders should educate eligible households about how to use the National Verification Portal. The Commission also should rely heavily on public libraries and other learning facilities to enroll underserved households.

D. The Commission Should Promote Transparency and Accountability To Ensure That Participating Households Understand When Benefits Will Be Depleted and So Program Benefits Can Be Effectively Evaluated.

Notwithstanding the substantial benefits that will be enabled by Congress’s appropriation of \$3.2 billion for EBB support, this funding is finite and may be depleted relatively quickly even though urgent needs persist. In all events, the statute provides that the “emergency period” during which funding will be available will end six months after a determination that there is no longer a public health emergency.²⁶ As a result, the Commission needs to make sure that households depending on EBB support are clearly informed about such limits and provided transition options after the program has concluded.²⁷ To do so, the Commission and USAC should provide eligible providers and the general public with up-to-date information about the depletion of funding. Providers in turn should inform customers that they will be eligible to transition to an alternative, lower-priced broadband plan at the conclusion of the emergency program, making clear the price, service levels, and other terms and conditions that will apply. Providers should give notice at the time of initial enrollment and again at least 30 days before program benefits are set to expire.

“[b]roadcast media has the transformative ability to empower and inform, and those exercising this power must represent all of us.”).

²⁶ H.R. 133, div. N, tit. IX § 904(a)(8)(B).

²⁷ The Civil Rights Commenters will urge Congress to appropriate additional funding, as the \$3.2 billion is merely a band-aid that cannot provide a lasting repair of the digital divide, but the Commission—and program participants—must be prepared for the possibility that no additional funding is made available.

In addition, the Commission should be transparent with Congress and the public regarding the efficacy of the EBB Program. To that end, the Commission should require USAC to report (on a streamlined basis) how many households were enrolled into the program. Examples of categories to report on can include the following:

- Households who qualify for pre-existing low-income plans
- Households who qualified through the National Verifier
- Supplemental Nutrition Assistance Program (SNAP) (Food Stamps)
- Supplemental Security Income (SSI)
- Medicaid Federal Public Housing Assistance (FPHA)
- Veterans Pension or Survivors Benefit Programs Tribal Specific Programs
- Bureau of Indian Affairs (BIA) General Assistance
- Tribal Temporary Assistance for Needy Families (Tribal TANF)
- Food Distribution Program on Indian Reservations (FDPIR)
- Tribal Head Start (only households that meet the income qualifying standard).

Additionally, the USAC should make these reports available to the public. Lastly, the Commission should conduct a randomized, anonymous survey of eligible households to assess their attitudes about the EBB Program and about their service providers. The survey will help inform future FCC programming to address the digital divide. This survey should be completed prior to the conclusion of the EBB Program to ensure full access and participation.

III. THE COMMISSION SHOULD ENSURE THAT PROGRAM OVERSIGHT DOES NOT UNDERMINE THE VITAL INTEREST IN WIDESPREAD PARTICIPATION

To be sure, as a steward of public funds, the Commission needs to ensure effective program oversight. But the Commission must not pursue its interest in preventing waste, fraud, and abuse—

which the Public Notice emphasizes at great length—at the expense of workable rules that maximize participation. Indeed, Congress’s goal of providing urgent support to millions of low-income households in need will be achieved only if the EBB Program includes streamlined application processes for consumers and clear standards and easily administrable rules that encourage broad participation by ISPs.

A. The Consolidated Appropriations Act and the Commission’s Existing Verification Processes from the Lifeline Program Provide Ample Means of Preventing Waste, Fraud, and Abuse.

Importantly, the EBB statute includes meaningful, straightforward mechanisms to ensure that eligible EBB providers do not recover excess funding. For example, providers must make various certifications, including that:

- The amounts they are seeking are not more than the standard rate;
- Each household for which the provider is seeking reimbursements will not be charged for an offering if the standard rate is less than or equal to the broadband benefit or will not be charged more than the difference between the standard rate and the broadband benefit;
- The household will not be charged an early termination fee if it later terminates a contract;
- Each household was not subject to a mandatory waiting period; and
- Each household will be subject to a participating provider’s generally applicable terms and conditions.²⁸

In addition, the Commission will be able to leverage the NLAD and schools’ verification programs, together with eligible EBB provider’s established procedures for verifying

²⁸ *Public Notice*, *supra* note 1, at 9.

eligibility and ensuring compliance with other applicable rules. In short, there is no basis to conclude that this program will be vulnerable to any substantial waste, fraud, or abuse. In fact, compared to other federal programs, Lifeline has very little waste, fraud, and abuse. For example, as previously noted by MMTC, the estimated improper payment rate for Lifeline in 2016 was 2.93 percent compared to an estimated improper payment rate for E-Rate of 5.70 percent and the Veterans Health Administration Community Care Program of 93.40 percent.²⁹ Indeed, despite concerns several years ago regarding potential misuse of Lifeline funds, recent reforms have been implemented to address this problem, and we expect that such safeguards will be effective in this context.

B. In All Events, the Commission Cannot Allow Oversight Mechanisms To Undermine the Critical Interest in Maximizing Participation by Eligible Low-Income Households.

As noted, the EBB Program will succeed only if the Commission encourages many ISPs to participate and low-income households can easily verify eligibility and enroll. Therefore, the Commission must ensure that the program is easily administrable for consumers and providers. The Civil Rights Commenters submit that the required statutory certifications, together with the Commission's safeguards under the National Verifier program and an appropriately tailored audit program, will be sufficient to ensure program integrity. But to the extent that the Commission considers adopting additional oversight mechanisms, it should ensure that these mechanisms strike an appropriate balance between prevention of waste, fraud, and abuse and ensuring that the rules do not impede participation by eligible households or eligible providers.

CONCLUSION

²⁹ See Comments of the Multicultural Media, Telecom and Internet Council and the "Lifeline Supporters," *Bridging the Digital Divide for Low-Income Consumers et al.*, WC Docket Nos. 17-287, 11-42, and 09-197 (filed Feb. 21, 2018).

Even in the best of times, but especially in the face of the COVID-19 pandemic, equitable access to high-quality broadband services, especially low-income people and communities of color, is crucial. Whether a family has access to a robust broadband plan that meets their needs determines if their children can go to school, if adults can maintain meaningful employment sufficient to pay the bills, and if the family can receive critical healthcare services, among many other functions. For the indefinitely quarantined, access to a robust broadband plan that meets their needs impacts whether communities can remain connected or whether they will be left behind in a society that increasingly relies on Internet services to progress and survive. The EBB Program provides a vital opportunity to address the harmful and debilitating impacts of COVID-19 on access to broadband services for low-income people and communities of color.

We urge the Commission to adopt the foregoing recommendations, which represent a human-centered design that will allow eligible providers to maximize the benefits of the program.

Respectfully Submitted,

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