

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Wireline Competition Bureau Seeks Comment	)	WC Docket No. 18-275
On Promoting Broadband Internet Access	)	
Service For Veterans	)	

**COMMENTS OF COMCAST CORPORATION**

Comcast Corporation (“Comcast”) hereby responds to the Public Notice issued by the Wireline Competition Bureau (“Bureau”) of the Federal Communications Commission (“Commission”) in the above-referenced docket.<sup>1</sup>

**I. INTRODUCTION**

Comcast commends Congress for passage of the RAY BAUM’S Act of 2018 and the Commission for tackling the important issue of promoting broadband Internet access for veterans. At Comcast, a commitment to veterans and support for the military community is rooted in our company’s history and our core values. It began with our founder, World War II U.S. Navy veteran Ralph Roberts, and it continues through today. We welcome the opportunity to share the important work Comcast is doing to ensure that veterans have access to the tools they need to succeed in civilian life, and to share the lessons of our experience.

Comcast recognizes that broadband has an unparalleled ability to transform people’s lives for the better. It has the power to create greater access to education, employment opportunities, health care services, news, and entertainment. That is why we created *Internet Essentials*, the

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<sup>1</sup> Wireline Competition Bureau Seeks Comment On Promoting Broadband Internet Access Service For Veterans, WC Docket No. 18-275, Public Notice, DA 18-947 (Sept. 12, 2018) (“Notice”).

nation's largest and most comprehensive high-speed Internet adoption program for low-income Americans. Through this program, Comcast has demonstrated its commitment to connecting low-income Americans to the Internet, more so than any other company in America. Since its launch in 2011, *Internet Essentials* has connected more than six million low-income Americans, in 1.5 million households, to high-speed Internet at home, most of them for the first time in their lives.

According to the U.S. Census Bureau's 2016 American Community Survey, about a third of low-income veterans do not have Internet service at home, and only about 60 percent own a computer.<sup>2</sup> This is simply unacceptable, and undoubtedly led to the inclusion of Section 504 of the RAY BAUM'S Act of 2018 and this proceeding. Comcast is committed to doing its part to help. Earlier this year, Comcast announced that it is significantly expanding eligibility for *Internet Essentials* to cover low-income veterans. Through this expansion, the second-largest eligibility expansion of *Internet Essentials* since its launch, an estimated one million low-income veterans will be eligible for the comprehensive broadband adoption program including free digital skills training, the opportunity to purchase an affordable computer for less than \$150, and low-cost, high-speed Internet service at home for only \$9.95 per month plus tax. With *Internet Essentials*, low-income veterans will be able to connect with the resources they need to manage issues they may face, and to find new opportunities that can change their lives.

Comcast recognizes that this work cannot be accomplished alone, and is developing a network of partners to help serve the needs of the veteran population. Through more than 300 new local partners – like Veterans Services Organizations (“VSOs”), county Veterans Service

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<sup>2</sup> U.S. Department of Veterans Affairs, *Profile of Veterans: Internet Use Deep Dive, Data from the 2016 American Community Survey*, Prepared by the National Center for Veterans Analysis and Statistics, at 4 (Apr. 2018), [https://www.va.gov/vetdata/docs/SpecialReports/Profile\\_of\\_Veterans\\_Internet\\_Use\\_Deep\\_Dive.pdf](https://www.va.gov/vetdata/docs/SpecialReports/Profile_of_Veterans_Internet_Use_Deep_Dive.pdf).

Officers, and VA Regional Benefit Offices – alongside national groups like the Elizabeth Dole Foundation and PsychArmor Institute, Comcast is helping more low-income veterans get connected to the Internet. This access enables veterans to get online, access the benefits to which they are entitled, and learn the digital skills they need to be successful as civilians in our fast-paced, global economy.

These steps build on our experience engaging with and understanding the diverse needs of veterans. Comcast has taken concrete steps to recruit, hire, retain, and support members of the military community. To that end, Comcast has established a dedicated Military and Veteran Affairs team headed by Brigadier General (Retired), U.S. Army, Carol Eggert.<sup>3</sup> As of December 31, 2017, we have hired 15,000 members of the military community, surpassing our goal of hiring 10,000 veterans, National Guard and Reserve members, and military spouses across the company.<sup>4</sup> Comcast supports its military employees through services for veterans and their families,<sup>5</sup> and benefits and leave policies that allow employees to focus on their military duties and achievements without worrying about their pay or benefits.<sup>6</sup> In addition, Comcast has established relationships with veteran-owned suppliers and training organizations.<sup>7</sup>

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<sup>3</sup> See Comcast, Military and Veterans Affairs, <https://jobs.comcast.com/military/our-commitment>.

<sup>4</sup> See Carol Eggert, SVP of Military & Veteran Affairs, Brigadier General (Retired), U.S. Army, *Comcast NBCUniversal Celebrates Military Hiring Achievement* (Mar. 12, 2018), <https://corporate.comcast.com/stories/comcast-nbcuniversal-celebrates-military-hiring-achievement>.

<sup>5</sup> For example, Comcast has a dedicated Military Concierge Service Team to help our managers and National Guard and Reserve employees and their families better understand our enhanced benefits and policies, and to assist them through any military-related transition events such as deployments or duty station relocations.

<sup>6</sup> See Comcast, Guard and Reserve Benefits, <https://jobs.comcast.com/military/benefits>.

<sup>7</sup> Comcast has partnered with Bunker Labs, a small-business incubator dedicated solely to veteran entrepreneurs. See Bunker Labs, <https://bunkerlabs.org/>; Press Release, *Bunker Labs And Comcast NBCUniversal Extend Partnership To Help Grow Military-Led Startups* (Mar. 10,

Whether recruiting and hiring veterans to join the ranks of Comcast employees or working to get veterans the tools to help them leverage the Internet to succeed and thrive in civilian life, Comcast is proud of its work to support our military community.

## **II. COMCAST IS COMMITTED TO BREAKING DOWN THE BARRIERS TO BROADBAND ADOPTION AMONG VETERANS**

As the *Notice* highlights, “[b]roadband is critical to ensuring that veterans, like all Americans, have full and meaningful participation in society.”<sup>8</sup> Comcast agrees. While there should continue to be a focus on deploying broadband networks to unserved areas, millions more Americans – including veterans – live in communities with access to broadband networks, yet they do not subscribe, and thus do not yet enjoy the benefits of broadband Internet access.

As of 2016, the national broadband adoption rate was about 81 percent.<sup>9</sup> That means about 19 percent of Americans did not subscribe to a broadband Internet connection at any speed above dial-up at home, whereas Commission data as of June 30, 2017 show that 96 percent of Americans had access to fixed terrestrial broadband at speeds of at least 10/1 Mbps,<sup>10</sup> and 93

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2017), <https://corporate.comcast.com/news-information/news-feed/bunker-labs-and-comcast-nbcuniversal-extend-partnership-to-help-grow-military-led-startups>. In addition, Comcast launched a partnership with Student Veterans of America to help provide meaningful job opportunities to veterans while they are in school and after they graduate. See Student Veterans of America, <https://studentveterans.org/>.

<sup>8</sup> *Notice* at 1.

<sup>9</sup> See Camille Ryan, U.S. Census Bureau, *American Community Survey Reports, Computer and Internet Use in the United States*, at 1 (Aug. 2018), <https://www.census.gov/content/dam/Census/library/publications/2018/acs/ACS-39.pdf> (“Among all households in 2016 . . . 81 percent had a broadband Internet subscription.”).

<sup>10</sup> FCC National Broadband Map, Fixed Broadband Deployment, Number of Fixed Residential Broadband Providers, [https://broadbandmap.fcc.gov/#/area-summary?version=jun2017&type=nation&geoid=0&tech=acfow&speed=10\\_1](https://broadbandmap.fcc.gov/#/area-summary?version=jun2017&type=nation&geoid=0&tech=acfow&speed=10_1). With satellite included, nearly 100 percent of Americans had access to fixed broadband at speeds of at least 10/1 Mbps.

percent had access to fixed terrestrial broadband (i.e., excluding satellite) at speeds of at least 25/3 Mbps.<sup>11</sup> This shows the critical importance of addressing the broadband adoption gap.

Rigorous quantitative research by the U.S. Census Bureau, the National Telecommunications and Information Administration (“NTIA”), and the Commission confirms that the most significant barrier to broadband adoption by a wide margin is a bucket of digital relevance and digital literacy issues.<sup>12</sup> To tackle these critical issues, Comcast has expended more than half a billion dollars in cash and in-kind support to fund digital literacy training and awareness, reaching more than 8.5 million people since 2011. This support is, by design, delivered through national and local nonprofit community partners, including affiliates of the National Urban League, YMCA of the USA, Boys & Girls Clubs of America, UnidosUS, and many others. This ensures that the content is relevant, trusted, and delivered by professional trainers. Comcast is continuing this effort with veterans by working with PsychArmor Institute to create veteran-specific digital skills courses that will be made available for free. This new content – including topics like how to sign up for VA benefits and find a support network online – will supplement the over 150 online training videos, guides and reports available through the *Internet Essentials* Learning Center. Likewise, Comcast has partnered with local VSOs, including, among others:

- The Veterans Multi-Service Center (“VMC”) in Philadelphia, PA that provides career and life-skill assistance to at-risk and homeless veterans is constructing a 66-unit

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<sup>11</sup> FCC National Broadband Map, Fixed Broadband Deployment, Number of Fixed Residential Broadband Providers, [https://broadbandmap.fcc.gov/#/area-summary?version=jun2017&type=nation&geoid=0&tech=acfosw&speed=25\\_3](https://broadbandmap.fcc.gov/#/area-summary?version=jun2017&type=nation&geoid=0&tech=acfosw&speed=25_3). With satellite included, nearly 100 percent of Americans had access to fixed broadband at speeds of at least 25/3 Mbps. *Id.*

<sup>12</sup> See, e.g., NTIA, *Digital Nation Data Explorer* (June 6, 2018), <https://www.ntia.doc.gov/data/digital-nation-data-explorer#sel=internetUser&disp=map> (reporting data from the U.S. Census Bureau’s 2017 Current Population Survey, which found that 58 percent of non-adopting households cited lack of need or lack of interest as the main reason for non-adoption, while 21 percent cited cost as the main reason).

facility – Edison 64 – to house homeless veterans. Comcast’s corporate headquarters office in Philadelphia has had a long-standing relationship with the VMC, including financial, in-kind, and volunteer support of their job search program and their Women Veterans Center, and is sponsoring a computer lab at its new facility.

- The Minnesota Assistance Council for Veterans (“MACV”) that provides housing, resources, and direct services to homeless and at-risk veterans across the state. This partnership focuses on supporting MACV’s online job training program and providing computers for eighty veteran residents to receive remote support and online case management through video conference, email, and chat – all without leaving the home.
- The Five Star Veterans Center in Jacksonville, FL that houses homeless veterans. Since many of them suffer from PTSD, substance abuse, and addiction, the Comcast grants supported the buildout of a computer lab for them to more easily communicate with their case workers and will support the hiring of a part-time instructor to provide over twenty classes of digital skills training focused on job readiness, including resume building and LinkedIn profiles.
- Operation Stand Down Tennessee (“OSDTN”) in Nashville, TN that provides transitional support to veterans, including technical training and employment assistance. In addition to expanding its computer lab to help its clients access VA benefits and services, the partnership supports the delivery of an introductory Vets Who Code training open to the community along with an expansion of its nine-week online coding curriculum to ten additional OSDTN clients.

Over the course of seven years, Comcast has learned the importance of making broadband relevant to the communities we serve. Buy-in among local “trusted voices” is critical to adoption; these voices elevate the importance of home Internet, lend credibility to the resources available through programs like *Internet Essentials*, and provide a valuable feedback mechanism. To that end, the recently announced partnerships with The Elizabeth Dole Foundation and PsychArmor Institute, as well as Comcast’s partnerships with numerous local VSOs, will help to reinforce the importance of digital inclusion among VSOs, caregivers, and government officials.<sup>13</sup> And while VSOs often provide a local hub for benefits and support

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<sup>13</sup> Press Release, *Comcast Corp., Internet Essentials Partners with Elizabeth Dole Foundation and PsychArmor Institute* (Sept. 25, 2018), <https://corporate.comcast.com/stories/comcasts-internet-essentials-program-to-partner-with->

services, they also can provide much-needed Internet access for those who may not have broadband at home. That is why Comcast is sponsoring the creation of computer labs at local VSOs, including those mentioned above; these online access points will highlight and facilitate the use of the benefits, services, and training that are most relevant and beneficial to the low-income veteran population.

The success of *Internet Essentials* is due both to its design as an integrated wrap-around solution, and to its structure as a partnership between Comcast and tens of thousands of community-based organizations, school districts and schools, libraries, government agencies and elected officials. Moreover, since the program's inception, Comcast has made more than thirty-five key enhancements, including eleven eligibility expansions. These substantial investments have resulted in the program's overwhelming popularity and success. Comcast surveyed *Internet Essentials* customers about their experience, and 90 percent said they are highly satisfied with the program, 92 percent said they would recommend the program to friends and families, and 84 percent already have.

As the *Notice* makes clear, Internet access has become a prerequisite for veterans to effectively transition into civilian life. For instance, low-income veterans seeking to pursue a new career path need Internet access to locate and apply for jobs, communicate with potential employers, and take advantage of educational opportunities for themselves and their families. Likewise, as the *Notice* highlights, "broadband-enabled telehealth services and applications can improve veterans' access to health care."<sup>14</sup>

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[elizabeth-dole-foundation-and-psycharmor-institute-to-help-more-low-income-veterans-cross-the-digital-divide.](#)

<sup>14</sup> *Notice* at 2. For example, the VA has dedicated significant resources to the launch and implementation of My HealtheVet ("MHV"), a combination web portal and personal health record management system. *My HealtheVet – Launch and Redesign*, Dept. Veteran Affairs, <https://www.myhealth.va.gov/mhv-portal-web/home?>. Among other things, MHV allows VA

Eligibility for *Internet Essentials* will help these veterans on all these fronts:

- *Internet Essentials* is widely used to access materials to improve educational and professional advancement. In a recent survey of existing *Internet Essentials* customers, 62 percent indicated that their broadband service helped someone in their household locate or obtain employment, and 98 percent said their families are using their broadband service for schoolwork.
- *Internet Essentials* also will empower low-income veterans to take advantage of opportunities to improve their health care outcomes, such as through access to in-home health care management tools. In our recent survey, 78 percent of subscribers said *Internet Essentials* has helped them with finding health or medical information, and almost 60 percent said they were influenced to enroll in the program because it enabled access to health and medical information.

The ultimate goal of these efforts is to break down barriers to adoption and connect more low-income veterans to Internet resources. Veterans have stood up for our country; now it's time for us to stand up for them by providing access to life-changing tools and resources.

### **III. THE COMMISSION SHOULD WORK CLOSELY WITH OTHER AGENCIES AND VSOS TO PROMOTE BROADBAND ADOPTION AND DIGITAL LITERACY AMONG VETERANS**

The *Notice* appropriately seeks comment on how “the Commission and other federal agencies, such as the [VA], [can] encourage collaboration, partnership, and best practices to promote broadband deployment to and adoption by veterans.”<sup>15</sup> Comcast respectfully submits the following observations and recommendations.

First, it is critical that the Commission address barriers to the adoption and use of broadband among veterans. As noted above, research shows that meaningfully tackling the broadband adoption gap requires addressing the bucket of digital literacy and relevancy issues that stand as the primary barrier to adoption for many Americans. An NTIA study discussed in the *Notice* found that “[v]eteran-led households that do not go online at home are *more likely to*

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patients to manage health care activities; communicate with VA health care teams and staff; and, as of September 2017, facilitated more than 107 million VA prescription refills.

<sup>15</sup> *Notice* at 2.



say they do not need or are not interested in the service than non-veterans,” which “could be an indication that getting more veterans online will require a unique form of outreach and education.”<sup>16</sup> This outreach and education needs to highlight the practical positive impact that access to broadband can have in helping veterans improve their lives.

Second, to effectively reach veterans, these programs must incorporate experience from the military community and address topics relevant to that population, such as access to VA benefits, telehealth programs, and new education and job opportunities. Consistent with that goal, efforts like the telehealth pilot programs proposed by the Commission for, among others, low-income veterans are important.<sup>17</sup>

Finally, while the *Notice* mentions the VA, other agencies also play an important role, and inter-agency coordination is essential to ensure that efforts are aligned and not duplicated. For example, the Department of Labor plays a critical role in helping America’s veterans, such as providing veterans with tailored employment resources and expertise, including an online job search tool.<sup>18</sup> And of course, collaboration with the Department of Defense will be critical in effectively reaching veterans as they transition from military service to civilian life.<sup>19</sup> The Commission could play a constructive role by working with these and other Federal agencies to develop the kind of comprehensive broadband adoption programs for veterans that include digital skills training, and would be compelling to – and resonate with – members of the military

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<sup>16</sup> See *id.* at 3 (citing NTIA, Fact Sheet: Veterans’ Computer and Internet Use (Nov. 8, 2017), <https://www.ntia.doc.gov/otherpublication/2017/fact-sheet-veterans-computer-and-internet-use>) (emphasis added).

<sup>17</sup> *Promoting Telehealth for Low-Income Consumers*, WC Docket No. 18-213, Notice of Inquiry, FCC 18-112 (Aug. 3, 2018).

<sup>18</sup> See U.S. Department of Labor, Veterans’ Employment and Training Service, <https://www.dol.gov/vets/veterans/index.htm>.

<sup>19</sup> See, e.g., U.S. Army, Soldier For Life - Transition Assistance Program, <https://www.sfl-tap.army.mil/pages/program.aspx> (providing transition assistance services to eligible Soldiers as they exit the military).

community, and to organize a national campaign to educate veterans on the benefits of digital literacy and opportunities for online engagement. And this federal support will also encourage state and local departments, offices, and officials to prioritize broadband adoption among veterans and create local solutions to address it.

#### **IV. CONCLUSION**

Comcast appreciates the opportunity to share our experience supporting members of the military community and promoting broadband adoption among veterans and the broader military community. Comcast is working hard to do our part, and we are partnering with thousands of community leaders and elected officials to do so. We are firmly committed to engaging with Congress, the Commission, other Federal agencies, and other stakeholders to ensure that our veterans are not left on the wrong side of the digital divide as they transition back to civilian life. Comcast looks forward to continuing to work together to support those who have served and sacrificed for our country.

Respectfully submitted,

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