



January 24, 2018

Chairman Ajit V. Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Bridging the Digital Divide for Low-Income Consumers, WC Docket Nos. 17-287, 11-42, 09-197

Dear Chairman Pai:

I am writing to impress upon the FCC the importance of the Lifeline Program to the communities we serve in the Twin Cities Metro Area of Minnesota. Since our founding 30 years ago the Saint Paul Neighborhood Network has been at the forefront of the community technology movement. One of SPNN's signature programs is the Community Technology Empowerment Project (CTEP). Since 2004, the CTEP program has placed AmeriCorps members at approximately 30 public computer centers in the Twin Cities to teach basic technology literacy skills for social, civic and economic empowerment to low-income communities and new Americans. Last year alone, the CTEP program helped certify over 1,500 individuals in technology skills, and more than 650 later obtained employment. Our AmeriCorps members also help hundreds of low-income people access low-cost home broadband every year, primarily through Comcast Internet Essentials and PCs for People.

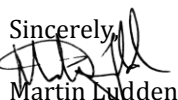
According to Purdue's Digital Divide Index up to 40% of residents in Ramsey County, where SPNN is located, do not currently have home broadband. The most frequently used subsidized internet options in the Twin Cities are available through Comcast Internet Essentials (\$9.95 for up to 15mpbs) and Century Link (9.95 a month for 12 months for up to 1.5 Mpbs), as well as through local nonprofit PCs for People (4G LTE for \$10 a month and no hidden fees).

We cannot rely solely on these programs to serve our low-income participants because a) consumers' access to current subsidy programs are limited by ISP's service areas; b) the programs vary greatly in eligibility requirements and quality—for instance Century Link has a limited time offer and the internet is slow; and c) the programs do not reach enough of our participants. PCs for People's model, for instance, is popular among our participants because PCs for People provides low-cost mobile hotspots that can move with people as they change addresses, but PCs for People does not have the capacity to equip all eligible Twin Cities residents with low-cost internet.

These are among the reasons we oppose the proposed outright elimination of the Lifeline Broadband Provider designation created by the 2016 Lifeline Order.

We might find less use for the Lifeline program if high speed home broadband was generally more affordable. However ISP monopolies in certain Twin Cities service areas, and digital redlining by their burgeoning competitors, keep high speed internet out of reach for most of our low-income program participants. While digital redlining and high prices are a problem, they should not overshadow the need for low-cost internet options for low-income people. Even in a Minneapolis neighborhood where recent ISP competition has caused internet costs to come down (US Internet, for instance provides high speed internet starting at \$34.00 a month in some Minneapolis neighborhoods) the internet is still unaffordable to those eligible for Lifeline. The Lifeline program is a critical program to provide cost support for participants in our program who could not otherwise afford internet. We therefore oppose the Commission's suggestion that the "digital redlining" of low income urban neighborhoods can be remedied by targeting enhanced Lifeline subsidies to encourage ETC infrastructure investment,

Our low-income participants are often low-income despite working full-time jobs and taking advantage of training and education programs offered by our partner programs. People come to our programs because they want to take to take the GED, learn computer skills to move up the work ladder, or participate in adult basic education programs. Providing our participants with affordable home broadband options through Lifeline is key to supporting them in these efforts.

Sincerely,


Martin Ludden
Executive Director
Saint Paul Neighborhood Network