

February 9, 2020



Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street NW  
Washington, DC 20554

**Re: Provider Eligibility, Data Sharing, and Public Education for the Emergency Broadband Benefit Program**

Dear Ms. Dortch:

As Next Century Cities stated in comments regarding the implementation and administration of the Emergency Broadband Benefit Program (“EBBP”),<sup>1</sup> ensuring that all eligible participants, including those in hard to reach areas, have service options should be a priority. Based on conversations with local officials across the country after the Commission announced the proceeding, we learned that many local leaders and their state counterparts who could be integral to program implementation simply do not know about the EBBP or how to help support the Commission’s efforts.

Accordingly, on February 5, 2021, Francella Ochillo and Ryan Johnston met with Commissioner Geoffrey Starks’ Legal Advisor for Wireline and Public Safety, Austin Bonner, and Special Advisor, Alisa Valentin, via video conference to discuss provider eligibility for the program; data collection and information sharing under the EBBP; and how the Commission can partner with the Universal Service Administrative Corporation and state and local governments to publicize the program.

We discussed the need for the Commission to take an expansive view of which providers are eligible to participate in the EBBP. Participating providers should include those that are already designated as Eligible Communications Providers (“ETCs”) in addition to other network models – municipal networks, community mesh networks, and electric cooperatives. These nontraditional networks will not only support participation in areas beyond where ETCs operate, oftentimes they provide lower-cost, higher-speed service options that could boost competition within the EBBP.<sup>2</sup>

Reiterating the importance of collecting data for this new program, we urged the Commission to make public the list of participating providers, their service offerings, and at what price those services are available. This information will help ensure that eligible

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<sup>1</sup> Next Century Cities Comments, WC Docket No. 20-445 (Jan. 25, 2021) (available at <https://ecfsapi.fcc.gov/file/1012601931755/01.25.21%20Emergency%20Broadband%20Benefit%20Fund%20%20NCC's%20Comments%20Final.pdf>).

<sup>2</sup> See generally Becky Chao and Claire Park, Cost of Connectivity 2020 (July 15, 2020), <https://www.newamerica.org/oti/reports/cost-connectivity-2020/focus-on-the-united-states/>; David Talbot, Kira Hessekiel, and Danielle Kehl, Community-Owned Fiber Networks: Value Leaders in America (2018), [https://dash.harvard.edu/bitstream/handle/1/34623859/2018-01-16-Pricing\\_final.pdf?sequence=5&isAllowed=y](https://dash.harvard.edu/bitstream/handle/1/34623859/2018-01-16-Pricing_final.pdf?sequence=5&isAllowed=y).



participants are able to make informed decisions *prior* to enrollment. Such public disclosure would also provide municipal and state governments with key data about who is and is not participating in the program, and key metrics for understanding the impact that the EBBP is having on their communities.

Similarly, we discussed the difficulties that may arise from sharing more granular data on consumers who are eligible for the EBBP based on their participation in other government assistance programs. While it would be helpful for communities to understand the demographics of participants, we recognize that there are compelling privacy considerations which must be taken into account. We recommended that any data released by the Commission be anonymized sufficiently to remain compliant with state privacy laws. Data that helps to inform assessments about whether the EBBP is an effective COVID-19 remedy or underutilized should be published.

The success of the EBBP is directly tied to the success of its public awareness campaign. Of the 33 million households eligible for the Commission's Lifeline program, only about one in four participate, a challenge which surface in the EBBP if the general public is not aware that support is available.<sup>3</sup> Here, without adequate public awareness about the availability of the EBBP, eligible households may not have access to the information they need to enroll. Thus, we explained the importance of the Commission and USAC working with state and local partners to advertise. Echoing calls from local officials, we stated that both the Commission and USAC should host centralized information. State, local, and Tribal governments need direction on how to support enrollment and accurate information about program benefits and responsibilities.

Finally, it is critical that the Commission ensure that EBBP advertising strategies extend to offline platforms. Understanding that the Commission is only allocated to spend 2% of the EBBP's funds on administration, the Commission should set resources aside for local and state allies to help promote participation. Advertising through wholly online means guarantees that the Commission only reaches part of the eligible population. Public service announcements on radio airwaves and advertisements on public access channels are also cost effective and efficient ways to reach historically disconnected populations.

Respectfully Submitted,

/s/ Francella Ochillo  
Francella Ochillo  
Executive Director  
Next Century Cities

/s/ Ryan Johnston  
Ryan Johnston  
Policy Counsel, Federal Programs  
Next Century Cities

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<sup>3</sup> See Universal Service Administrative Co., Lifeline: Program Data, <https://www.usac.org/lifeline/learn/program-data/> (last visited Feb. 9, 2021).



cc: Austin Bonner  
Alisa Valentin

