

February 9, 2021



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

**Re: Increasing Effectiveness of, and Using Community Anchor Institutions to Promote, the Emergency Broadband Benefit Program**

Dear Ms. Dortch:

On February 5th, Ryan Johnston met with Commissioner Brendan Carr’s Legal Advisor, Ben Arden, and Policy Advisor, Greg Watson, via video conference to discuss provider eligibility for the Emergency Broadband Benefit Program (“EBBP”); actions that could combat waste, fraud, and abuse; and ways for the Commission to partner with the Universal Service Administrative Corporation and community anchor institutions to ensure that eligible consumers are able to benefit from the program as intended. Both are critical components of program administration and implementation.

The COVID-19 pandemic has revealed many reasons why internet connectivity is a necessity for every household, regardless of income or geography. Yet many residents will be unaware of their EBBP eligibility. As Next Century Cities (“NCC”) stated in our January 25th comments,<sup>1</sup> using varied methods to reach those who are unable to afford broadband connections at the standard cost should be at the core of developing program rules and outreach strategies.

Regarding efforts to combat potential waste and fraud, I stated that price transparency is essential for consumers to understand what service options are available and the cost. Public disclosure of this type of information would help to prevent providers from taking unfair advantage of participants. Additionally, audits to ensure that the cost reimbursed to providers is the same as the price charged to participants can help to avoid draining program resources that must last until the end of the pandemic. The Commission should also ensure that EBBP audits collect pricing information on what internet service plans would cost for non-EBBP consumers.

I highlighted that the Commission’s partnerships with school districts and other community anchor institutions are critical for effective advertising. The EBBP is designed to help take the burden off students who are now required to learn from the safety of home. Research shows that low-income students may not have the requisite internet connection or devices to fully participate in remote learning.

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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>).



The need for EBBP support is in communities of all sizes. Nationwide, for households with incomes below \$35,000, 4.3% confirmed that their children never have a device available for distance learning.<sup>2</sup> For households with incomes below \$25,000, devices were rarely or not ever available for children’s learning in 12.2% of respondents households while 9.8% of households did not even have an internet connection.<sup>3</sup> Among teenage students living in households with an annual income below \$30,000, nearly one in four did not have a computer at home.<sup>4</sup> With social distancing mandates applying to entire families, even households that have since acquired a device may not have enough devices available for all family members for telework work and remote learning throughout the day. Several months into the pandemic, in September 2020, 59% of U.S. parents in households living on lower incomes indicated that their children may face digital obstacles in completing schoolwork.<sup>5</sup>

School aged children reflect one segment of the population in need. A study released in March 2020 by the National 4H Council and Microsoft found that of 1,500 students ages 13-19 surveyed, 20% of teens living in rural areas lack high-speed internet access while nearly half of all students surveyed said that their home internet speed negatively impacted their ability to complete school work from home.<sup>6</sup> Furthermore, the study found that a lack of internet access impacted students’ confidence about graduating high school and accessing employment opportunities.<sup>7</sup> These concerns are supported by a Philadelphia Federal Reserve study released in August 2020, which found a correlation between households without broadband access and lower labor force participation and higher unemployment.<sup>8</sup>

Naturally, the Commission must find meaningful ways to collaborate with school districts and community anchors, which are far more public facing than any government entity, to

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<sup>2</sup> See Victoria Collis and Emiliana Vegas, *Unequally Disconnected: Access to Online Learning in the U.S.* (June 22, 2020), <https://www.brookings.edu/blog/education-plus-development/2020/06/22/unequally-disconnected-access-to-online-learning-in-the-us/>.

<sup>3</sup> *Id.*

<sup>4</sup> See Brooke Auxier and Monica Anderson, *As Schools Close Due to the Coronavirus, Some Students Face a Digital Homework Gap* (March 16, 2020), <https://www.pewresearch.org/fact-tank/2020/03/16/as-schools-close-due-to-the-coronavirus-some-u-s-students-face-a-digital-homework-gap/>.

<sup>5</sup> Emily Vogels, *59% of Parents with Lower Incomes Say Their Child May Face Digital Obstacles in Schoolwork* (Sept. 10, 2020), <https://www.pewresearch.org/fact-tank/2020/09/10/59-of-u-s-parents-with-lower-incomes-say-their-child-may-face-digital-obstacles-in-schoolwork/>.

<sup>6</sup> See National 4-H Council, *New Survey Finds Teens Without Access to High-Speed Internet Are Less Likely to Believe They Can Achieve the American Dream* (March 24, 2020), <https://4-h.org/media/new-survey-finds-teens-without-access-to-high-speed-internet-are-less-likely-to-believe-they-can-achieve-the-american-dream/>.

<sup>7</sup> *Id.*

<sup>8</sup> Alvaro Sanchez and Adam Scavette, *Broadband Access, Computer Use, and Labor Market Attachment in Philadelphia* (Aug. 2020), <https://www.philadelphiafed.org/-/media/frbp/assets/community-development/reports/broadband-access-computer-use-and-labor-market-attachment-in-philadelphia.pdf>

(“There is a 27 percentage point gap in labor force participation between workers with and without an at home broadband computer in Philadelphia, compared with a 21 percentage point gap in the nation. There is a 7 percentage point gap in the unemployment rates between workers with and without an at-home broadband computer in Philadelphia, compared with a 4 percentage point gap in the nation.”).



ensure that the low-income students and their families learn about the EBBP. It is helpful for eligible participants to hear about the program from trusted messengers – teachers, librarians, or faith leaders – as these community leaders have been developing connectivity solutions and providing resources throughout the pandemic. If the Commission works with these institutions, providing the direction and resources, the EBBP will be better positioned to achieve its goal of connecting all low-income residents who are struggling with connectivity during the pandemic.

It is also worth noting that school districts already have experience working with other Universal Service Fund (“USF”) programs. Allowing them to help bring consumers to the EBBP will not only make the EBBP more efficient, but it will also have the tangential effect of making consumers more aware of the other opportunities that schools can offer them under other USF programs.

Respectfully Submitted,

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

cc: Ben Arden  
Greg Watson

