

February 5, 2021



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

**Re: Working With Local Officials to Ensure the Success of the Emergency  
Broadband Benefit Program**

Dear Ms. Dortch:

On January 25, 2021, Next Century Cities submitted comments regarding the implementation and administration of the Emergency Broadband Benefit Program (“EBBP”). On February 4th, Francella Ochillo and Ryan Johnston met with Commissioner Nathan Simington’s Chief of Staff, Carolyn Roddy; Wireless Advisor, Erin Boone; and Media Advisor, Adam Cassady, via telephone to discuss provider eligibility for the program; actions that could combat waste, fraud, and abuse; and ways for the Commission to partner with the Universal Service Administrative Corporation and state and local governments to ensure that information regarding the Emergency Broadband Benefit Program is made widely available to anyone who may be eligible for the program.

As the COVID-19 pandemic continues to force individuals to work, learn, shop, and interact with loved ones from home, broadband connectivity is critical. The Emergency Broadband Benefit Program is designed to meaningfully address one of the largest barriers to broadband adoption – cost. The Commission is in the process of collecting comments on many of the facets of this program including how it should determine which providers are eligible to participate.

We urged the Commission to take an expansive view of provider eligibility, including providers that are already designated as eligible telecommunications carriers (“ETC”) as well as providers that the Commission has not previously considered. We explained that including municipal networks, community mesh networks, and electrical and coops alongside traditional providers would help improve service options and support participation much farther than if only designated ETC or incumbent providers were eligible to participate. We also highlighted concerns from our members in areas where there are no incumbent providers or ETCs. If the Commission does not include municipal network providers, mesh networks, and cooperatives, many eligible households may not have a service provider.

Additionally, we recommended that automatic enrollment should be limited to providers that are already designated as ETCs. Since USAC has already done the work to vet them, requiring duplicative applications will only inundate USAC with work they have already completed. To the contrary, verification is necessary for non-ETC providers. If the



Commission were to automatically enroll providers that were subject to further examination and then removed, this would cut against the Commission's directive to minimize waste. In that instance, a provider could begin servicing a community and then be removed from the program, which would waste money and resources on ineligible providers and risk service interruptions for program participants.

Noting that the Emergency Broadband Connectivity Fund is a finite resource that must last through the rest of the pandemic, we urged the Commission to require providers to make pricing data public (including promotional pricing and fees). This would allow consumers to make informed decisions while also reducing potential fraud by way of discrepancies between what providers are reporting their prices are versus what EBBP participants are being charged.

Finally, we discussed the importance of the Commission and USAC working with state and local partners to advertise the EBBP. The Commission and USAC are in the best position to host centralized information. Considering that this is a federal program, state, local and tribal governments will look to the Commission for clear direction and accurate information. Accordingly, the Commission should host a centralized website with information and resources. This will help to ensure that participants and program allies will be able to find information on enrollment, program benefits, and participant responsibilities.

Respectfully Submitted,

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

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

cc: Carolyn Roddy  
cc: Erin Boone  
cc: Adam Cassady

