

NDIA and signatories strongly agree with The Cities of Los Angeles, California; Chicago, Illinois, Portland, Oregon, Boston, Massachusetts and the Texas Coalition of Cities for Utility Issues comments. Specifically, their assertions that there is a marketing challenge associated with the Emergency Broadband Benefit are spot on. This sentiment is in alignment with the *ex parte* letter from Public Knowledge, “The FCC can ensure eligible individuals are notified by allocating a portion of the administrative funds to marketing campaigns through a diverse set of media outlets targeting all eligible participants and minority audiences”.¹ Unfortunately, the Consolidated Appropriations Act of 2021 allocated zero monies for the outreach of this program. Similar to the The Cities of Los Angeles, California et. al. comments, NDIA petitioned the Federal Communications Commission to prioritize local initiatives and support the marketing of the Emergency Broadband Benefit. Awareness and transparency of the EBB program are vital to its success.

Recommendation

It is our recommendation that the FCC allocate \$30 million of its allowed \$64 million in EBBP administration dollars to the states, tribes and territories to disburse for community-based EBB outreach. The states, tribes and territories could then partner with organizations experienced in signing up eligible households for discount internet programs. For Boston’s Tech Goes Home, 154 partner sites and 300 instructors were necessary to successfully market discount internet programs within the city of Boston and the greater Boston area alone.² Similarly, Kids First Chicago serves as another example of an organization intentionally recruiting partners trusted by unconnected populations. Knowing trusted informed advocates are essential, Community based organizations (CBOs) received funding to conduct outreach to eligible families of Chicago Public Schools students. CBOs serve as trusted informed advocates for internet service purchased through a sponsored agreement with two internet service providers. The CBOs’ work has had a positive impact on the number of households signing up for subsidized internet service.

We also recommend that marketing to existing or new customers should be specific so as to ensure customers are well informed of their options. When an ISP markets EBB to an existing customer, the customer should know the start and end date of the program and their financial contribution. This will ensure that customers understand they have choices and are not misled.

Why Community-Based Outreach is Needed

According to a recent in-depth study of digital adoption efforts in California, programs that significantly increase the likelihood of successful home internet adoption include informed advocates who understand both the low-cost broadband offerings and the needs of low-income households.³ NDIA’s Affiliates experiences guiding sign up for free and low-cost internet confirm these research findings.

¹ See Ex Parte Letter of Public Knowledge, Free Press, Georgetown Law Institute for Technology Law & Policy, Next Century Cities, Open Technology Institute, Benton Institute for Broadband & Society, National Digital Inclusion Alliance, A Learned Hand, LLC, National Consumer Law Center, The Leadership Conference on Civil and Human Rights, Joint Center, Media Justice, Libraries Without Borders (filed Jan. 11, 2021.)

² Tech Goes Home Impact Report 2020

https://47ab9e76-c79f-45c8-8473-ff7df2a7cd56.filesusr.com/ugd/f01914_2a3f84485cf94608bb8900b53fb40864.pdf

³ Lloyd Levine. *Broadband adoption in urban and suburban California: information-based outreach programs ineffective at closing the digital divide*. Journal of Information, Communications and Ethics in Society. 18 June 2020. <https://www.emerald.com/insight/content/doi/10.1108/JICES-04-2020-0041/full/html>



To successfully market the EBB program, the FCC must allocate funds to community based efforts with knowledge of both free/low-cost broadband offerings and the needs of low-income households.



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