



February 21, 2018

**Federal Communications Commission**

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

EveryoneOn respectfully submits these comments in response to the Federal Communications Commission's (FCC's) request for public comments on the Inquiry Concerning Bridging the Digital Divide for Low-Income Consumers, WC Docket Nos. 17-287, 11-42, 09-197. EveryoneOn thanks the FCC for providing this opportunity to comment on this issue.

*About EveryoneOn*

EveryoneOn is a national nonprofit creating social and economic opportunity by connecting everyone to the internet. Since 2012, we have connected more than 500,000 low-income people in 48 states to free and affordable home Internet service, devices, and digital literacy training. We aim to leverage the democratizing power of the internet to provide opportunity to all people in the United States — using connectivity to create social mobility for all.

Our organization has been able to attain national scale while maintaining impact on a community level due to our three-part approach: 1) working with internet service providers to create and deploy low-cost offers; 2) creating a best-in-class digital platform, which is best described as a “TurboTax for digital inclusion” that families can use to access affordable internet service, devices, and digital literacy education; 3) and maintaining a nationwide network of partners across sectors who are working on-the-ground directly in communities. No other organization has brought together such a collection of assets to bridge the digital divide.

Serving as a facilitator between low-income communities and people and internet service providers, device refurbishers, and digital literacy trainers, we also work with enrollment partners (nonprofits, schools, and other community-based organizations) across the country to better reach eligible populations. Through our digital platform, partner platforms, and relationships with internet service providers and device refurbishers, we are able to market these affordable home internet offers and collect data in order to help people adopt the Internet and end the digital divide once and for all.

According to the American Community Survey, 62 million people living in the United States lack home internet access. Of those unconnected, 50 million people have access to an offer from an ISP but are unable to afford the monthly payments. The 2016 Lifeline Modernization order would have provided subsidies for many of these individuals, which would have enabled them to access the life-changing power of the internet. The Notice of Proposed Rulemaking and Notice of Inquiry discussed here not only seek to completely undo all the potential good that the Modernization Order would have accomplished but, in reducing the effectiveness and reach of the Lifeline program, actively block millions of people

living in the United States from improving their lives through educational, professional, and healthcare resources available online.

In particular, EveryoneOn profoundly objects to (1) the elimination of the Lifeline Broadband Provider designation, and (2) the elimination of non-facilities based ETCs. The revocation of the Lifeline Broadband Provider (LBP) designation would strangle innovation coming from small broadband carriers that operate in local areas and are connected to their communities. For example, many of the coalition members of the National Digital Inclusion Alliance (NDIA), of which EveryoneOn is a member, that could have participated in the Lifeline program will be blocked from doing so. The removal of the LBP designation, combined with the elimination of non-facilities based ETCs, will reduce the pool of applicants that could provide broadband through the Lifeline program to a mere handful of entities.

Additionally, the FCC majority's argument that the LBP classification preempts State authority is harmful and ironic, especially considering the FCC majority does not seem to value States' rights with regard to other programs, such as net neutrality.

The proposed changes to the Lifeline program would, in effect, kill the program in all but name. Instead of further restriction, EveryoneOn urges the FCC to adopt more inclusive policies and definitions in order to close the digital divide and enhance digital equity with all speed. A nationally-determined LBP designation would enable small and future-facing entities to be eligible for the program. The designation may also encourage national ISPs to participate in the Lifeline program as they would be able to enhance their already-existing eligibility programs.

It is only through dynamic and future-proof policies and processes that encourage innovative thinking that we will be able to close the digital divide, providing access to the American dream to all people living in the United States. By closing the digital divide, the United States will experience enhanced social equity and an economic boom of over \$50 billion.<sup>1</sup> These are resources that the country desperately needs.

Respectfully submitted,



Chike Aguh  
Chief Executive Officer  
EveryoneOn

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<sup>1</sup> [Deloitte](#)