

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
Wireline Competition Bureau Seeks Comment ) WC Docket No. 21-93  
on Emergency Connectivity Fund For )  
Educational Connections and Devices to )  
Address the Homework Gap During the )  
Pandemic )

**COMMENTS OF ZP BETTER TOGETHER, LLC**

ZP Better Together, LLC (“ZP”) hereby submits comments to the Federal Communications Commission (the “FCC” or “Commission”) in response to the Public Notice released by the Wireline Competition Bureau (the “Bureau”) on March 16, 2021 regarding the emergency connectivity fund to address the homework gap during the pandemic.<sup>1</sup> ZP is an FCC-certified provider of video relay service (“VRS”), which provides vital communications access for people who are deaf, hard of hearing or have speech disabilities. ZP Better Together, LLC (“ZP Better Together”) applauds Congress for establishing a \$7.171 billion Emergency Connectivity Fund as part of the recently enacted American Rescue Plan Act of 2021.<sup>2</sup> ZP encourages the Bureau and the Commission to consider the needs of the deaf and hard of hearing community in the administration of the Emergency Connectivity Fund.

As the Bureau acknowledges, people with disabilities, including those in the deaf and hard of hearing community (the “Community”), have been disproportionately impacted by the

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<sup>1</sup> *Wireline Competition Bureau Seeks Comment on Emergency Connectivity Fund For Educational Connections and Devices to Address the Homework Gap During the Pandemic*, WC Docket No. 21-93, DA 21-317 (WCB rel. Mar. 15, 2021) (“Public Notice”).

<sup>2</sup> American Rescue Plan Act, 2021, H.R. 1319, 117th Cong., tit. VII, § 7402 (2021).

COVID-19 pandemic.<sup>3</sup> The isolation that has affected all Americans in the past year has been felt particularly hard by the Community, many of whom are low-income and may struggle to afford the broadband connection necessary to enable the video-based communications they rely on. As such, ZP recommends that the Bureau consider mechanisms to prioritize, or, at a minimum, ensure access to, funded services or devices for people with disabilities. These mechanisms could include partnering with disabilities rights organizations, or other community-based organizations to educate the Community on the availability of these funds.

Additionally, given that remote learning depends on high-quality video, and the communications relied upon by the Community also relies upon high-quality video, the Bureau should require that funded connectivity provides the necessary bandwidth and speeds to support video communications that will satisfy the needs of both uses. ZP looks forward to engaging with the Bureau and Commission further on this and other broadband funding opportunities to ensure that people who are deaf and hard of hearing receive equal communications access.

Respectfully submitted,

/s/ Gregory Hlibok  
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<sup>3</sup> Public Notice at 6 (“We recognize that people with disabilities have faced additional challenges as a result of the pandemic-necessitated transition to remote learning.”).