



Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Ajit Pai
Commissioner Jessica Rosenworcel
Commissioner Michael O’Rielly
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

October 28, 2014

Re: Comcast-Time Warner Cable, Docket #14-57

Dear Chairman and Commissioners:

Social Interest Solutions is writing to respectfully urge you and your colleagues at the Federal Communications Commission (FCC) to secure a public benefit from the proposed Comcast acquisition of Time Warner Cable (TWC) and trade of service territory with Charter Communications. Specifically, we recommend the FCC ensure that Comcast improves its Internet Essentials (CIE) program by taking the two following steps:

1. Require Comcast to extend CIE to include all low-income households and
2. Hold Comcast accountable for achieving clear performance goals for the program.

Social Interest Solutions is a California-based national non-profit technology and policy organization focused on improving enrollment and retention in public and privately funded health and social services programs by reforming and modernizing systems and processes. More than 15 million Americans have leveraged SIS’s web-based eligibility and enrollment system, One-e-App, to gain access to needed health and social services.

Affordable broadband at home is a crucial means for low-income Americans to connect to health, education, job training, nutrition assistance, housing, and other programs and services that are increasingly available through online sources, such as healthcare.gov. Comcast Internet Essentials - which provides home Internet access at a \$9.95 per month, a computer for \$149.99 plus tax, online training and other benefits - could have a significant impact. For example, 87% of all California students on free-or-reduced lunch will reside in Comcast service areas if the acquisition is approved. Yet, despite the promise of the program, challenges with the subscription process have resulted in just 14% of the eligible population being signed up during the last three years.

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Should the FCC decide to approve this acquisition, SIS respectfully requests that the FCC take the opportunity to order Comcast to greatly improve its program, and to be accountable for delivering a functional, results-driven program with measurable goals showing a real public benefit to low-income persons in its service areas. We request at least the following components be included in such an approach:

1. **Include All Low-Income Households:** Extend Comcast Internet Essentials to all low-income households, not just those with school children. For example, low-income seniors, people with disabilities and recently returned veterans are not covered today. According to the California Emerging Technology Fund's 2014 Annual Statewide Survey, 6 in 10 of those who do not use the Internet at home suggested they might be interested if they had access to affordable broadband and equipment and the skills to use it.
2. **Set Performance Goals:** Set a national goal for Comcast to increase Internet Essentials subscribership for eligible households to reach 45% in 2 years, and to continue the program until 80% adoption is achieved in low-income neighborhoods in each major market within the combined service areas. Mechanisms should be put in place to monitor performance against these goals and to adopt performance improvements as necessary. For example, adequate outreach staff, advertising and operational resources should be devoted to the program to deliver acceptable levels of performance.

The FCC set forth a bold vision to empower all Americans with high-speed Internet access in the National Broadband Plan. In furtherance of that vision, Social Interest urges the FCC to take advantage of this opportunity to ensure that the benefits of the CIE program are delivered to low-income families in a more meaningful way.

Sincerely,



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