

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Telecommunications Carriers Eligible for Universal Service Support)	WC Docket No. 09-197
)	
Connect America Fund)	WC Docket No. 10-90

COMMENTS OF COMMON SENSE KIDS ACTION

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August 31, 2015

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Comments of Common Sense Kids Action

Common Sense Kids Action (“Common Sense”) respectfully submits these comments in response to the Second Further Notice of Proposed Rulemaking (“FNPRM”) posted in the Federal Register on July 17, 2015, by the Federal Communications Commission (“Commission” or “FCC”) in the above-captioned proceeding.¹ Common Sense is an independent, nonpartisan voice for America’s children that helps parents, children and teachers thrive in the complex world of media and technology. Common Sense works to drive policies at the state and national levels that promote investment in children’s education and overall well-being. Common Sense has an uncommon reach among parents and teachers, with more than 50 million users, 92,000 member schools, and more than 250,000 member teachers across its network.

Introduction

Like the telephone in the 20th century, broadband Internet has become the primary means of communication in the 21st century. In its FNPRM, the Commission appropriately stated:

“Broadband is necessary for even basic communications in the 21st Century, and offers improved access to and quality of education and health services, improved connectedness of government with society, and the ability to create jobs and prosperity. Broadband access thus is necessary for even basic participation in our society and economy.”²

However, despite its importance, broadband is not universally available. Thirty percent of Americans, including a disproportionate number of low-income and minority households, do

¹ *Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund, Notice of Proposed Rulemaking*, WC Docket Nos. 11-42, 09-197, 10-90, FCC 15-71, proposed June 18, 2015, <https://federalregister.gov/a/2015-17289>.

² *FNPRM*, ¶ 5.

not have a broadband connection at home.³ Ensuring that all households—especially those with school-aged children—have access to broadband at home should be a national priority.

In addition to more than a decade of work helping parents and teachers navigate America’s increasingly digital social and educational environments, Common Sense has a long and successful track record of advocating for children’s access to high-speed Internet. Common Sense was a key supporter of the Administration’s ConnectEd program and the FCC’s E-rate Modernization Orders.⁴ ConnectEd and E-rate are important steps towards connecting all children with reliable 21st century technology. Currently, we are working to help states and school districts take advantage of new E-Rate resources.

The second step in this critical national connectivity effort is to ensure that all children have access to broadband Internet at home. Therefore, Common Sense strongly supports the FCC’s proposal to modernize the Lifeline program to include an option for broadband Internet. Expanding Lifeline to include broadband is one crucial step towards ensuring that all children and families have equal access to home-based broadband.

Summary of Arguments

Common Sense supports modernizing the Lifeline program to include home broadband. Our comments address the questions in the FNPRM that are most relevant to Common Sense’s expertise while focusing on five key points:

³ “Broadband Technology Factsheet,” *Pew Research Center*, last updated 2015, <http://www.pewinternet.org/fact-sheets/broadband-technology-fact-sheet/>.

⁴ “Modernizing E-Rate,” *Federal Communications Commission*, last updated January 13, 2015, <https://www.fcc.gov/e-rate-update>.

- 1. Modernizing the Lifeline program to include broadband will minimize the “homework gap” and help to ensure that low-income students have access to the same educational tools as their wealthier counterparts.** Most teachers assign homework that requires the Internet, and students without it—too often those in low-income households—are at risk for falling behind in school. Low-income children are already at risk for lower academic achievement, and lack of home broadband further limits their opportunities to succeed. Thus, the Lifeline program should give highest priority to low-income families with school-aged children, those most likely to be caught in the “homework gap.”
- 2. Modernizing the Lifeline program to include broadband will help low-income households improve their financial footing and strengthen the overall economy.** Though by no means a complete solution, this step will help to address risk factors associated with children living in poverty.
- 3. In modernizing the Lifeline program, the FCC should set a minimum standard of speed in order to close the “homework gap,” and for other reasons.** A minimum connectivity speed may indeed be necessary to ensure that students can complete all assignments and be able to do so in a timely manner.
- 4. In modernizing the Lifeline Program, the FCC should shift the enrollment and eligibility process to a neutral third party.** Responsibility for determining eligibility of Lifeline participants should no longer be born by telecommunication carriers. Rather, to help ensure fiscal responsibility and program accountability, the process should be shifted to a neutral third party, such as the administrator of an existing government benefits program. This shift will reduce the potential for ineligible program users and

will encourage more carriers to join the Lifeline marketplace, likely bringing costs down as carriers compete for Lifeline subscribers.

- 5. Modernizing the Lifeline program will be most effective if coupled with an education program for eligible users and enrollees.** The Lifeline program should include specific methods for explaining to new users the benefits of the program and how to access the subsidy, how to acquire suitable devices, and how to receive technology training. Common Sense and other organizations can help with these efforts.

Modernizing Lifeline to Include Broadband Will Improve Education

The Commission solicited comments about Lifeline’s applicability to the problem of the so-called “homework gap,” when children are assigned homework that they cannot complete because they lack an adequate Internet connection at home. The Commission stated, “The need for connectivity for educational purposes does not necessarily stop at the end of the school day. Teachers often assign work to their students that requires broadband connectivity outside of school hours to more efficiently and effectively complete the assignment or project.”⁵

Today, seven out of 10 teachers assign homework that requires the use of the Internet.⁶ As students get older, home broadband becomes increasingly important to their schooling.

⁵ *FNPRM*, ¶ 18.

⁶ Kat Stewart, “Cox Proudly Extends its Commitment to Connect2Compete,” *National Cable and Telecommunications Association (NCTA)*, published August 19, 2014, <https://www.ncta.com/platform/industry-news/cox-proudly-extends-its-commitment-to-connect2compete/>; See also the 2008 study conducted by Grunwald Associates LLC for Cable in the Classroom: Larry Barrett, “77% of Teachers Assign Internet-Required Homework: Survey,” *Multichannel News*, October 24, 2008, <http://www.multichannel.com/news/internet-video/77-teachers-assign-internet-required-homework-survey/298980>.

Almost every high school student says that teachers regularly assign homework that requires the Internet.⁷ Even when teachers assign homework that they don't think requires Internet access, most students still use the Internet to complete their homework.⁸

However, five million households with school-age children do not have broadband at home, and a disproportionately high number of those households are low-income families.⁹ Kids without home broadband—those caught in the homework gap—must find alternatives to home broadband, like going to a friend's house that has high-speed Internet, finding a commercial location with free Wi-Fi, or going to a public library. These alternatives can be burdensome for students—for example, public libraries often have time limits on Internet use and lines of patrons waiting to use library computers. The difficulty of accessing an Internet connection can prevent low-income students from fully preparing for each school day, putting them at a further educational disadvantage compared with their more affluent peers.

The detrimental effects of low home broadband penetration on student achievement are exacerbated because parents in homes without adequate Internet connections have greater

⁷ Thirty-one percent of high school students say they are required to use the Internet for homework assignments outside of school daily; 42% are required to use it every few days; 10% are required to do so once a week; and 10% are required to every few weeks. See “Taking the Pulse of the High School Student Experience in America: Research Findings—‘Access to Technology,’ Phase 1 of 6,” *National Research Center for College and University Admissions*, published April 29, 2015, https://www.fosi.org/documents/142/Taking_the_Pulse_Phase_1_Research_Findings_FINAL.pdf.

⁸ “From Chalkboards to Tablets: The Emergence of the K-12 Digital Learner,” *Project Tomorrow: Speak Up*, published June 2013, <http://www.tomorrow.org/speakup/pdfs/SU12-Students.pdf>.

⁹ About a third (31.4%) of households whose incomes fall below \$50,000 and with children ages 6 to 17 don't have broadband at home. See *Chart 2 and the Appendix of John B. Horrigan, “The Numbers Behind the Broadband Homework Gap,” Pew Research Center*, published April 20, 2015, <http://www.pewresearch.org/fact-tank/2015/04/20/the-numbers-behind-the-broadband-homework-gap/>.

difficulty than their better-connected peers in viewing grades online, contacting teachers, downloading or printing assignments, and visiting school websites. This gap between families with broadband and those without it becomes more pronounced as household income drops.¹⁰ And in classrooms with students who don't have Internet access at home, teachers feel constrained from incorporating digital technology into their teaching, thus affecting the education of *all* students—regardless of whether individual students have home broadband.¹¹

Common Sense recognizes that the Lifeline program is not the only answer to closing the homework gap. The Commission correctly stated that, “[N]o one program or entity can solve this problem on its own and what is needed is many different organizations, vendors, and communities working together to address this problem.”¹² Still, Common Sense agrees that modernizing Lifeline to include broadband is a crucial step towards helping students in low-income families improve their educational outcomes.

The value of home broadband for low-income students is underscored in the stories of Tristan, Nelly, and Sarah, three youths from Anchorage, Alaska, who were in jeopardy of not graduating from high school. Though each had a unique story, all had difficult backgrounds, including periods of homelessness. Through a technology loaner program, they borrowed

¹⁰ In households making \$150,000 or more that have school-aged children, only three percent don't have high speed Internet at home, but the number rises to 40% in households earning less than \$25,000. See *Chart 2 and the Appendix of John B. Horrigan, “The Numbers Behind the Broadband 'Homework Gap,’” Pew Research Center*, published April 20, 2015, <http://www.pewresearch.org/fact-tank/2015/04/20/the-numbers-behind-the-broadband-homework-gap/>.

¹¹ Fifty-six percent of teachers of the lowest income students say that students' lack of access to digital technologies is a "major challenge" to incorporating more digital tools into their teaching; 21% of teachers of the highest income students report that problem. See Kristen Purcell *et al.*, “How Teachers Are Using Technology at Home and in Their Classrooms,” *Pew Research Center*, published February 28, 2013, <http://www.pewinternet.org/2013/02/28/how-teachers-are-using-technology-at-home-and-in-their-classrooms/>.

¹² *FNPRM*, ¶ 22.

computers and modems, took online courses, and successfully completed high school.¹³ Stories like theirs demonstrate the potential power of technology and the value of home Internet for equalizing students' opportunities for success across socioeconomic boundaries.

Modernizing Lifeline to Include Broadband Will Strengthen Our Economy

The FCC's interest in extending broadband Internet to low-income households will benefit the national economy. All Americans, regardless of income, benefit economically as more people gain access to home broadband. Home broadband penetration is highly correlated with an increased GDP, and some studies suggest a causal relationship.¹⁴ Acquiring home

¹³ "Anchorage School District," *Mobile Beacon*, <http://www.mobilebeacon.org/anchorage-school-district/>.

¹⁴ See, for example:

--"Last year (2010) Ericsson and Arthur D. Little concluded that for every 10 percentage point increase in broadband penetration GDP increases by 1 percent." See "New study quantifies the impact of broadband speed on GDP," *Ericsson*, published September 27, 2011, <http://www.ericsson.com/news/1550083>.

--"World Bank research indicates that, for high-income countries, a 10-percentage-point rise in broadband penetration adds a 1.21-percentage point rise in economic growth." See The Broadband Commission for Digital Development, "Broadband: A Platform for Progress," *UNESCO*, published June 2011, <http://unesdoc.unesco.org/images/0021/002198/219825e.pdf>.

--"About two years after the initial spike in Internet growth, we begin to also see GDP levels starting to rise. The growth of GDP nearly mirrors the curve at a two-to-three year delay." See Shahram Amiri and Brian Reif, "Internet Penetration and its Correlation to Gross Domestic Product: An Analysis of the Nordic Countries," in the *International Journal of Business, Humanities and Technology*, published February 2013, http://www.ijbhtnet.com/journals/Vol_3_No_2_February_2013/5.pdf.

--"The consensus seems to be that a 10-percent increase in broadband's household penetration delivers a boost to a country's GDP that ranges from 0.1 percent to 1.4 percent." See Soren Buttkereit *et al.*, "Mobile Broadband for the Masses: Regulatory levers to make it happen," *McKinsey & Company*, published February 2009, https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&cad=rja&uact=8&ved=0CB8QFjAA&url=http%3A%2F%2Fwww.mckinsey.com%2F~%2Fmedia%2Fmckinsey%2Fdotcom%2Fclient_service%2Ftelecoms%2Fpdfs%2Fmobile_broadband_for_the_masses.ashx&i=PMGaVeSgNomrgwTc0JGIDA&usg=AFQjCNF_x-Xemd5wl9vkovqFTuGhfw83WA&sig2=fcSxw9-

broadband has also been shown to increase household income. Households that go from having no Internet to a basic four-megabits-per-second connection, for example, have seen an estimated rise in income of \$2,100 per year.¹⁵ This higher income may be because having an Internet connection allows for more robust and flexible work arrangements, provides access to educational opportunities, and enables people to search and apply for jobs online. Increased earnings, of course, further stimulate the economy as previously lower-income consumers participate more fully in the marketplace.

As noted above, having broadband Internet at home provides a significant advantage to those seeking new employment or career development opportunities. People can use the Internet to find job opportunities, apply for jobs, pursue online degrees, complete job training, research a company or an organization, connect with professional networks, and better communicate with employers. Most Americans feel that not having broadband Internet at home would be a disadvantage when it comes to finding a job or learning career skills.¹⁶ Because low-income Americans are less likely to have home Internet, they are at an even greater disadvantage in today's digital economy, making it harder to improve their economic status.

Expanding Lifeline to include broadband can help to lower the number of children living in poverty. Children and youth living in low-income households are already at risk for a well-known list of negative outcomes, such as poor academic achievement, higher rates of dropping out of school, abuse and neglect, physical health problems, developmental delays, and behavioral

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¹⁵ "Measuring the Impact of Broadband on Income," *Ericsson*, published 2013, <http://www.ericsson.com/res/thecompany/docs/corporate-responsibility/2013/impact-of-broadband-speed-on-household-income.pdf>.

¹⁶ See *Chart 2 and Appendix* in Kathryn Zickuhr and Aaron Smith, "Home Broadband 2013," *Pew Research Center*, August 26, 2013, <http://www.pewinternet.org/2013/08/26/home-broadband-2013/>.

and socio-emotional problems.¹⁷ Solutions to these problems and others related to youth living in poverty are obviously complex but can be partly addressed by increasing broadband penetration in low-income households.

Lastly, part of staying competitive in our global market is being connected online. The United States is not ranked first, second, or even in the top 10 countries with household broadband penetration. Instead it ranks 20th, behind France (4th), the United Kingdom (10th), and Canada (12th).¹⁸ If the United States is to continue its role as a global economic and technology leader, it must take steps, including updating the Lifeline program, to improve broadband penetration rates.

Ensure Minimum Broadband Speed for Lifeline Participants

The Commission requested comments on the question of whether to establish a minimum broadband speed that vendors would be required to offer. In order to close the homework gap, and for other reasons, a minimum speed may indeed be necessary to ensure that students can complete all assignments and be able to do so in a timely manner. The FCC should consider requiring a minimum speed that will address this issue. Rather than set a fixed speed for Lifeline-eligible products that would need continual upgrades as technology improves, the FCC should establish a minimum service standard range that reflects comparably functional products normally available in the marketplace and ensures adequate functionality for users. The FCC

¹⁷ “Effects of Poverty, Hunger, and Homelessness on Children and Youth,” *American Psychological Association*, 2015, <http://www.apa.org/pi/families/poverty.aspx>.

¹⁸ The Broadband Commission, “The State of Broadband 2013: Universalizing Broadband,” *United Nations Educational, Scientific, and Cultural Organizations*, published September 2013, <http://www.broadbandcommission.org/Documents/bb-annualreport2013.pdf>.

should not allow Lifeline to deliver functionally inadequate connectivity for families and children. Doing so would risk wasting Lifeline dollars at the expense of low-income families.

Enrollment and Eligibility Decisions Should Be Shifted to a Third Party

The Commission requested comments about potentially shifting subscriber eligibility verification and enrollment decisions to a neutral third party in order to enhance fiscal responsibility and program accountability. The Commission stated that removing this burden from carriers could serve as an incentive for more carriers to participate in the Lifeline program, thereby increasing competition, improving quality, and reducing costs.

Common Sense agrees that the enrollment process can and should be revised so that telecommunications carriers are no longer the responsible party for determining subscriber eligibility. Instead, a neutral third party, either at the state or federal level, should bear this responsibility. For example, verification of eligibility to participate in Lifeline could occur simultaneously with verification of eligibility for one or more other low-income support programs, such as the Supplemental Nutrition Assistance Program (SNAP), Medicaid, or Supplemental Security Income (SSI), three programs that correlate with Lifeline eligibility today. This new verification process for Lifeline would prevent private companies from accidentally or intentionally enrolling individuals who do not qualify for Lifeline. Further, to help ensure only one subsidy per household, the eligibility verification information would be sent from SNAP, Medicaid, or SSI to a designee of the FCC, such as the Universal Service Administrative Company (USAC), which would be responsible for maintaining a database of Lifeline users and ensuring that only one subscriber per household is enrolled at any one time.

This shift in responsibility could also increase the security of subscribers' information by requiring that it be collected and stored in fewer locations.

Shifting verification of eligibility to SNAP, Medicaid, or SSI could reduce Lifeline's administrative burden by saving time and trouble for subscribers and carriers. The program will still incur administrative costs, and the FCC should determine the appropriate reimbursement payments to SNAP, Medicaid, or SSI for their participation in the process. Removing the verification eligibility responsibility from carriers could encourage more carriers to participate in Lifeline. Increasing carrier participation should drive down the cost of service as increased consumer mobility fosters competition in the marketplace.

Lifeline Enrollees Will Need Education about the Program, Access to Devices, and Technology Training

The Commission has requested comments about how federal and state agencies can educate consumers about enrolling in the Lifeline program. Common Sense believes that educating eligible and enrolled Lifeline participants is essential for the success of the program. Potential and current subscribers should understand the differences in the products and services that Lifeline offers, the basics of Internet safety and security issues, and the types of devices that can access the Internet and how to acquire such devices. SNAP, Medicaid, SSI, and USAC could provide educational packets at the time of verification and/or enrollment. The FCC could contract with outside organizations and companies to provide Lifeline education programs. Schools and libraries could also play an important role in an education campaign. Public-private partnerships, such as that of the Administration's ConnectEd program, could help families with school-aged children obtain affordable devices. In situations where schools offer one-to-one

computing programs, students may be given devices to take home to complete homework once their homes are connected to broadband. In addition, many students and adults could benefit from digital literacy training. Common Sense and other organizations have extensive experience with digital literacy programs and could be of assistance in this effort.

Conclusion

Expanding broadband penetration should be a national priority. Greater broadband penetration increases educational attainment, strengthens our economy, and advances personal income, and yet, 30 percent of American households lack broadband connectivity at a time when high-speed Internet is considered an essential 21st century communications tool. As a nation, it is our responsibility to close the digital divide that is exacerbating inequality in our school systems and communities. One important step, but certainly not the only step, toward achieving this goal is to modernize the FCC's Lifeline program to include broadband service. This step is most important for our youth, whose educational and economic outcomes will be increasingly determined by their ability to navigate the technological landscape in every field of study and work. Common Sense strongly supports the FCC's proposal to move forward with implementing the proposed changes to the Lifeline program, consistent with the comments and recommendations herein.

Respectfully submitted,

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About Common Sense: Common Sense is dedicated to helping kids thrive in a world of media and technology. We empower parents, teachers, and policymakers by providing unbiased information, trusted advice, and innovative tools to help them harness the power of media and technology as a positive force in all kids' lives. [Common Sense Kids Action](http://www.common sense media.org/kids-action), the advocacy arm of Common Sense Media, works with policy makers, business leaders, and other advocates across the nation to ensure that every child has the opportunity to succeed in the 21st century. Kids Action works to drive policies at the state and national levels that promote access to high-quality digital learning experiences; ensure that kids' online privacy and safety are protected; make access to high-quality early education possible for every child; and reduce childhood poverty. With potential advocates in every home and school across the nation, Kids Action is building a movement dedicated to making kids and education America's top priority. www.common sense media.org/kids-action