

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

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

**COMMENTS OF UNIVISION COMMUNICATIONS INC.**

Univision Communications Inc. (“Univision”) submits these comments in response to the Commission’s *Second Further Notice of Proposed Rulemaking* (“*Second FNPRM*”)<sup>1</sup> in the captioned proceeding to affirm the importance of broadband as a vital national resource and to encourage efforts that promote broadband awareness and literacy to all U.S. consumers.

Univision, the leading media company serving Hispanic America, wholeheartedly agrees with the fundamental premise of the *Second FNPRM* that broadband is a necessary tool to participate fully in our society and in our economy,<sup>2</sup> and that access to broadband must be ubiquitous in order for its potential as a transformative technology to be realized. As the *Second FNPRM* confirms, broadband is critical to our lives, whether we are exploring opportunities in the job market, seeking health care coverage, engaging in civic participation, or pursuing an

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<sup>1</sup> See *In the Matter of Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket No. 11-42, WC Docket No. 09-197, WC Docket No. 10-90, *Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order* (June 18, 2015) (“*Second FNPRM*”).

<sup>2</sup> *Id.* at ¶ 5.

education.<sup>3</sup> Particularly with respect to education, “[w]ithout broadband at home many students and teachers face a ‘homework gap’ that makes learning in the 21st Century even more difficult.”<sup>4</sup>

This is an issue of special importance to Univision, which devotes substantial resources to promoting the value of education to U.S. Hispanics. The homework gap is particularly prevalent among U.S. Latino families served by Univision: while 74 percent of the non-Hispanic white population and 62 percent of the African American population are connected to broadband, only 56 percent of Hispanics have high-speed Internet access at home.<sup>5</sup> Many Latino children therefore find themselves without the tools they need to maximize their educational opportunities -- and immediate action is required to remedy that issue. For these students, access to fixed broadband services at home (as opposed to mobile broadband service on transient phones and tablets) is particularly important, as fixed broadband offers greater bandwidth at a lower price point, typically without restrictions such as bandwidth caps, in a stable and supported home environment that is conducive to learning. Univision therefore supports responsible programs, whether public or private, that help U.S. Hispanics gain access to affordable broadband in the home.

The *Second FNPRM* seeks “creative solutions” to address the homework gap and other disparities that may arise when broadband service is not readily available -- or when the importance of broadband is not well known -- in certain segments of the community. The Commission acknowledges that, absent clear solutions, students in communities that lack (or are not sufficiently aware of) ubiquitous, affordable, and reliable broadband services will not have

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<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> Broadband Technology Fact Sheet, PEW RESEARCH CENTER (Aug. 14, 2015), <http://www.pewinternet.org/fact-sheets/broadband-technology-fact-sheet/>

“the same opportunity as their classmates to reach their full potential and feel like they are part of the academic conversation.”<sup>6</sup>

The impact of these limited opportunities reaches beyond the classroom. Today’s students are tomorrow’s workers, and Hispanics will play an increasingly significant role in the U.S. workforce: by some projections, the Latino population will account for 40% of the increase in the U.S. workforce over the next five years.<sup>7</sup> Ensuring that Latino students have access to broadband thus helps support not only their immediate academic success but also the long-term strength of a vital component of U.S. economic growth.

Although the *Second FNPRM* focuses primarily on reforming the Commission’s Lifeline program to address these challenges, it also recognizes that “no 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.”<sup>8</sup>

Earlier this month, Univision, together with Common Sense Media,<sup>9</sup> heeded this call by launching *¡Avanzamos Conectados!* (Connected, We Advance!), a campaign that highlights the importance of broadband connectivity to educational attainment and provides families with information about affordable access and guidelines for supervising Internet usage in the home. Among other things, the campaign is pursuing three simultaneous approaches to help close the “homework gap:” (1) informing parents about the importance of broadband access and its connection to educational performance, and encouraging families to get broadband access at

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<sup>6</sup> *Second FNPRM* at ¶ 22.

<sup>7</sup> See IHS ECONOMICS, HISPANIC IMMIGRATION AND US ECONOMIC GROWTH, 5 (2015), available at <https://www.ihs.com/info/0215/hispanic-immigration-economic-growth.html>.

<sup>8</sup> *Second FNPRM* at ¶ 22.

<sup>9</sup> Common Sense Media is an independent, nonpartisan organization that supports causes that benefit America's children. These causes include investing in education, health, and overall well-being. In doing so, Common Sense Media works with leaders across the country to advance policies and programs that help give every child the opportunity to thrive. Common Sense Media reaches more than 50 million users, 92,000 member schools, and 250,000 member teachers across its network.

home; (2) connecting Hispanics with local resources to get broadband access and computer hardware at the best value; and (3) providing parents with guidelines for supervising safe and responsible Internet use.

The campaign will raise awareness of issues regarding broadband access through public service announcements on Univision's television, radio, and online platforms; news and public affairs segments across the company's network and local programming; and outreach to Hispanic families at events and education fairs organized by its affiliate stations across the country. In addition, the campaign will feature local phone banks, Facebook question and answer sessions, and Twitter town hall meetings to allow families the opportunity to have their questions answered by experts. Univision Contigo, the company's public service affiliate, also will mobilize its Parent Academies, which are workshops aimed at empowering parents to help their children achieve their educational goals, to incorporate new modules on responsible digital citizenry and how to get families connected.<sup>10</sup>

Additionally, Univision Contigo has partnered with Everyone On, a national non-profit organization that supports the availability of high-speed, low cost broadband service and digital literacy, to develop a text messaging platform that will drive awareness of a mobile website for parents to help get families connected. The new platform will help parents identify discounted broadband, including any Lifeline Program, and computer services by zip code and also help them find Internet training in their local neighborhoods.<sup>11</sup> Univision and Common Sense media also will provide parents with expert tips on how to use technology in a safe and balanced way.

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<sup>10</sup> Univision Contigo partners with other leading organizations to help bring focus to the most critical issues facing the Latino community. Together, Univision Contigo and its partners provide a range of valuable resources that inform Latino families and enable them to take immediate action to improve their access to universally-accepted building blocks for success: Education, Health, Prosperity and Participation.

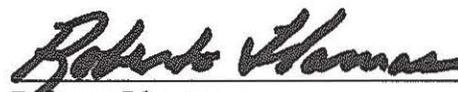
<sup>11</sup> In the three weeks since this platform was launched, nearly 30,000 families already have accessed the digital resources made available on the website.

Naturally, Univision and Common Sense Media are coordinating their activities with other organizations to ensure that the impact of these activities is maximized in communities across the U.S. These organizations include the League of United Latin American Citizens, the National PTA, the National Hispanic Media Coalition, the Hispanic Heritage Foundation, and Latinos in Tech Innovation and Social Media. These organizations will determine how *¡Avanzamos Connectados!* can aid their individual efforts by connecting Hispanic families with resources; they also will distribute information about the campaign, connecting their networks to Univision's resources, and collaborating in identifying other like-minded organizations and strategies to secure broader Internet and computer access for the families and students whose futures depend on them.

Access to ubiquitous, affordable, and reliable broadband service today is critical to participate fully in our society, but absent sufficient awareness of its importance wide swaths of U.S. consumers can get left behind. Univision and Common Sense Media are working hard to ensure that *¡Avanzamos Connectados!* creates widespread awareness of the importance of broadband in the home so the entire Hispanic community is empowered to succeed in the Digital Age.

Respectfully submitted,

**UNIVISION COMMUNICATIONS INC.**



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Roberto Llamas  
Executive Vice President and Corporate  
Officer, Human Resources and Community  
Empowerment  
Univision Communications Inc.  
605 Third Avenue, 12th Floor  
New York, New York 10158  
Tel. (212) 455-5482  
E-mail. [bllamas@univision.net](mailto:bllamas@univision.net)

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