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November 17, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42

Dear Ms. Dortch:

On November 13, 2015, Kathy Zachem and the undersigned of Comcast met with Gigi Sohn, Jon Wilkins, Matthew DelNero, Trent Harkrader, and Eric Feigenbaum of the Commission staff to discuss Lifeline reform proposals in the above-referenced docket.

We reiterated Comcast's support for the Commission's efforts to modernize the Lifeline program to support broadband services effectively. Consistent with Comcast's comments in this proceeding, we urged the Commission to simplify and streamline the rules for program entry and provider participation. In particular, the Commission should remove providers from the customer eligibility verification process by implementing a national third-party verifier, which would also reduce opportunities for waste, fraud and abuse. Provider participation criteria such as the current eligible telecommunications carrier requirement also should be eliminated or simplified such as through a streamlined federal registration process. Increasing provider participation will help ensure that low-income consumers receive robust services and the Commission should not adopt Lifeline minimum service standards that place undue restrictions on Lifeline customers' ability to apply their Lifeline subsidy to the broadband plan that best meets their needs.

In the meeting, we also discussed lessons learned from Comcast's *Internet Essentials* program – the nation's largest and most comprehensive broadband adoption program – and research on broadband adoption and utilization which show the critical importance of addressing a bucket of digital literacy and relevancy issues in order to meaningfully tackle the broadband adoption gap.¹ We highlighted that closing the digital divide is fundamentally dependent on a

¹ See, e.g., John B. Horrigan, Knight Foundation, *Adoption of Information & Communications Technologies in the United States: Narrowing Gaps, New Challenges*, at 8 (2013), http://www.knightfoundation.org/media/uploads/publication_pdfs/Knight_Digital_Access_Update_Feb2014.pdf; Octavian Carare (FCC), Chris McGovern (Connected Nation Inc.), Raquel Noriega (Connected Nation Inc.), and Jay A. Schwarz (FCC), *The Willingness to Pay for Broadband of Non-Adopters in the U.S.: Estimates from a Multi-State Survey* (2014), http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2375867.

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comprehensive approach that addresses digital relevance and digital literacy, the cost of computing equipment, and the cost of broadband service. We further discussed the second study of *Internet Essentials* customers by Dr. John B. Horrigan. Called *Deepening Ties*, it examined the evolution of customers from non-adopters to adopters. Perhaps the most striking finding of this report is that the real key to economic and personal empowerment through broadband adoption comes when you combine Internet access with formal training and education. For example, the study found that those who received formal digital training were 15 percentage points more likely to use the Internet to look for a job.²

We emphasized that the success of *Internet Essentials* is due to its design as an integrated wrap-around solution that marries low-cost high-speed Internet access with training and education and access to a low-cost computer, and the reason that it is structured as a partnership between Comcast and thousands of school districts, libraries, elected officials, and nonprofit community partners.

In light of the research, we discussed that the Commission should promote the development of comprehensive broadband adoption programs. We further discussed that a way to do this would be to include in Lifeline reform a requirement that broadband providers accepting Lifeline support implement digital literacy and relevance training programs. We noted that different populations may need customized solutions designed to address their specific needs and thus, providers should have sufficient latitude to design varying and effective training programs. We also discussed that the Commission could track digital literacy and relevance training initiatives by having providers submit information regarding their training programs on an annual basis.

Please direct any questions to the undersigned.

Sincerely,

/s/ Jordan B. Goldstein
Vice President, Regulatory Affairs
Comcast Corporation

cc: Matthew DelNero
Eric Feigenbaum
Trent Harkrader
Gigi Sohn
Jon Wilkins

² John B. Horrigan, *Deepening Ties: Comcast Internet Essentials Customers Show Broader and Deeper Ties to the Internet Over Time – Especially Among Those Who Had Digital Literacy Skills Training* (2015), <http://corporate.comcast.com/images/comcast-ie-report-2-horrigan.pdf>.