

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

In the matter of	)	
American Recovery and Reinvestment Act of	)	GN Docket No. 09-137
2009: A National Broadband Plan for	)	
Our Future, Notice of Inquiry	)	
	)	

**Comments of One Economy Corporation**

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One Economy Response to FCC: A National Broadband Plan for Our Future, Notice of Inquiry 7-31-09 (GN Docket No. 09-137)

One Economy Corporation appreciates the opportunity to respond to the United States Federal Communications Commission's request for comments regarding the National Broadband Plan. Our comments herein should be taken as an extension to the comments that we submitted in response to [GN Docket No. 09-51](#), also found at <http://www.one-economy.com/press/downloads>.

## **I. One Economy's Credentials**

One Economy has been working for the past nine years to maximize the potential of technology to help low-income people improve their lives and enter the economic mainstream. Working on four continents, we use innovative approaches to deliver the power of technology and information to low-income people, connecting them to valuable tools for building better lives. We help bring broadband into the homes of low-income people, employ youth to train their community members to use technology effectively, and create public-purpose media that engages, informs, and facilitates action.

Our efforts in bringing technology to low-income people are rooted in an approach of making broadband Available, Affordable, and Adoptable. This approach is a model that we have used successfully time and time again to connect people to the digital age. One Economy connects people to affordable broadband access, while also ensuring that the technology is adopted through our youth Digital Connectors program and our public-purpose media properties. The principles of Availability, Affordability, and Adopted not only form the basis of our work, but also for our ongoing comments to the National Broadband Plan.

### ***Community Connections***

One Economy has worked with more than 50 communities around the world to build digital inclusion programs, including offering free or low-cost Internet access, providing affordable computers, and building the capacity of local organizations that integrate technology into their work. From 2004 to 2006, we worked to change state affordable housing finance policies in 42 states to encourage the inclusion of broadband into the homes of low-income people. As a result of our efforts, more than 350,000 Americans now have affordable broadband in their homes.

### ***Digital Connectors***

One Economy's Digital Connectors® offer the knowledge and skills required for young people to be successful learners, workers, and leaders in the 21<sup>st</sup> century. The Digital Connectors program is a youth development movement that teaches best practices engaging teens and young adults, ages 14-21, in leadership development, media education, life skills management, and community service. Through learning about their respective roles in their communities, thinking critically about how media affects their lives, producing their own media about pressing issues, and developing team-building and leadership skills, youth are able to master technical competencies and practice lifelong principles that inspire educational advancement, workforce preparation, and local or global citizenry. Overall, 3,000 Digital Connectors have provided more than 56,000 hours of community service in more than 30 cities. These youth have also worked

with over 15,000 families, helping them to foster adoption of broadband technology in their respective communities.

### ***Next Generation Public-Purpose Media***

One Economy has created a network of public-purpose media properties that connect low-income people to resources and information about important issues such as health, jobs, money, schools, and housing. One Economy's multilingual websites, written at an accessible literacy level, combine compelling programming with localized, relevant information that helps people take action. The Public Internet Channel ([www.pic.tv](http://www.pic.tv)), One Economy's latest effort, is a multimedia experience that inspires and engages its viewers to improve their lives. Everything on the Public Internet Channel is relevant, current, accessible, and, whenever possible, local – and always with a clearly-defined public purpose. Led by our signature website, the Beehive ([www.theBeehive.org](http://www.theBeehive.org)), these online tools have reached nearly 18 million people, many of whom are coming online for the first time.

## **II. Executive Summary**

The purpose of our comments herein is to provide our recommendation on the framework, construction, and key elements for the National Broadband Plan (Plan). In doing so, we remark upon the following:

**The Broadband Progress Board** (a concept we introduced in our response to [GN Docket No. 09-51](#)). We discuss the role the Board and advisors to the Board would play, the timing to role out this Board, and who key members of the Board and advisors would be.

**The 3Us – Ubiquity, Usage, and Utility.** We believe the Plan composition and measures for success should be guided by the principles of Ubiquity, Usage, and Utility. To promote Ubiquity, the Plan should be judged on both the availability of affordable broadband connections and the subscribership to those broadband connections. Though Anchor Institutions should be important components to the Plan, the home should be considered the focal point for ubiquity today, and 24/7 access “on-the-person” connectivity should be considered the focal point for ubiquity in the future. To foster Usage, the Plan should be judged on the consumption of the Internet and on specific areas of content. To ensure Utility, the Plan should be judged on the increases in measureable outcomes in sync with Administration goals. We specify a number of these Utility measures in that section of the comments. With the 3Us in place, the Plan will achieve its great promise.

**Measurement Tools.** Though there are many sources for measurement, we discuss a few that focus on the end-user, the consumer of broadband services. The tools that we talk about are broadband mapping, the FCC's Consumer Survey and Broadband Registry, community assessment surveys and field hearings, civic engagement through public-purpose media, and private company measurement. In using these tools, we discuss the importance of including demand side variables and focusing on the 3Us in order to capture the best variables to judge success.

**The Social Dividend** (a concept we introduced in our response to [GN-Docket No. 09-51](#)). As spectrum is a public good, broadband must also have a public purpose. We classify that public

purpose as a Social Dividend, or enhanced socioeconomic outcomes. In this section, we delve into the importance of providing underserved populations with advanced hardware, software, and broadband connections and review the importance of “Leapfrogging” in underserved and unserved communities. Additionally, in order to compete in the global marketplace, our efforts must also focus on transforming the individuals in these communities not just into consumers of technology but also into producers and architects of technology.

**Customer-Centricity.** Toward the end of our comments, we provide our input on the necessity for consumer-centricity in the broadband arena. Technology will be shaped by innovations and the ever-changing needs of the consumer. If we don’t make our policies and programs responsive to those changes, then we will fail to meet the promise of technology that this Administration has embraced.

Throughout this document, we will address many of the questions posed in the Notice of GN Docket No. 09-137, in addition to expounding upon some of the principles we iterated in our previous response to [GN Docket No. 09-51](#). The topics covered in that previous response were:

- One Economy’s Recommended Approach | Broadband with a Purpose and a Social Dividend
- Broadband Deficit | Intentional Focus on Low-Income Populations
- Free Market Principles | Focus on Supply AND Demand
- Leapfrogging | Next-Generation Networks for Underserved and Unserved
- North Star | Government’s Role as a Free Market Stimulus and the Creation of a Broadband Progress Board
- Civic Engagement | Gathering Opinions and Mapping’s Role in the Broadband Plan

### **III. Formation of the Broadband Progress Board**

The first step in developing the Plan should be gaining input from key actors in the broadband community. Whether these individuals actually sit on the Broadband Progress Board or act as advisors, their opinions are vital to ensure that relevant items are included in the Plan, that we avoid unintended consequences, and that interim benchmarks and annual measures are put into place. Realizing that the FCC is under considerable time pressure to complete the plan by February 2010, the Commission may not be able to formalize a Board by that time, so we recommend that the key actors should be approached informally prior to Plan development. The Board and its advisors should be formalized very soon after the Plan is created.

Once formed, the role of the Board should be:

1. Develop, refine, or alter interim benchmarks and annual measures
2. Suggest and approve strategies for meeting benchmarks and goals
3. Create best pathways for implementing strategies
4. Make decisions based on reports and recommendations on changes or improvements to Plan, benchmarks and measures, or strategies to achieve benchmarks and goals
5. Ensure that civic participation is part of the Plan development process and ongoing feedback

Though the central Broadband Progress Board should be limited to 20 in number, so as not to be unwieldy, Board and Advisors to the Board should include:

- Key members of the FCC
- Government agencies impacted most specifically by broadband, including Commerce, Department of Education, Department of Energy, Department of Labor, Health and Human Services, Housing and Urban Development, National Institutes of Health, National Science Foundation, and United States Department of Agriculture
- Private companies or associations, especially in regards to broadband providers, Internet application providers, and other key broadband services
- National or international non-profit companies engaged in activities vital to the adoption of broadband
- National or international non-profit companies representing unserved, underserved, vulnerable populations, and other key public constituencies

#### **IV. Developing the Plan and Gauging Success | the 3Us**

We have used the 3As – Availability, Affordability, and Adoptability – as our guiding principles in analyzing our own efforts and the efforts of others. In an expansion of that concept, we recommend using the 3Us as guiding principles for developing the Plan and for gauging its success:

- Ubiquity – is broadband 1) available to 100% of the U.S. and 2) subscribed to by 90% of the U.S.?
- Usage – is broadband being consumed in greater amounts by subscribers?
- Utility – is broadband actually contributing to national goals, from productivity to employment to healthcare to education, etc.?

##### ***Ubiquity***

Of course, availability of broadband should be a measure of ubiquity, and we support the Administration’s goal to deliver broadband to 100% of the country. Yet, just supplying broadband only answers the first half of the supply AND demand relationship. We must also focus on removing the obstacles to demand so that 100% of the country has 24/7 use of the Internet.

Ubiquity underscores the need for affordability in hardware and affordability in broadband connection. It also necessitates the need to increase awareness around the importance of broadband connections and the vital role it will play in the life of underserved and unserved populations. These elements must be prominently addressed in the Plan in order to achieve the Ubiquity benchmarks that we suggest.

We discussed numerous policies to meet these goals, including Universal Service reform, creative financing tools, and many other levers in our previous comments ([GN Docket No. 09-51](#)). However, all of these policies must focus intently on sustainability. Programs must be piloted and proven successful, carried out by entities that have already delivered measurable results, and have a long-term focus. We need to think carefully about the way we structure subsidies to incentivize broadband and hardware purchases, municipal WiFi, public-private partnerships, and mapping initiatives that don’t provide a pathway toward adoption.

The notion of Ubiquity raises several additional questions, including: What is the importance of speed and bandwidth issues in increasing the supply of broadband? How do we define 24/7 use of the Internet? Do Anchor Institutions have a role in Ubiquity?

*Speed and Bandwidth* – Though we will leave the question of speed to others, One Economy’s stated goal is to “deliver the most speed to the most people.” However, we recommend that the Commission remain technology and provider agnostic, that the benchmarks progress over time, and that the FCC favors Leapfrogging – the use of next-generation networks (4G, 5G) in underserved or unserved communities. The broadband infrastructure in these communities is much smaller, so the installation of next-generation networks makes sound fiscal sense. Leapfrogging will also create a longer runway before the infrastructure becomes outmoded – an important factor in communities that are often last to receive market-based capital improvements. Lastly, Leapfrogging will produce a Social Dividend, a socioeconomic benefit to overlooked communities and an intentional bridging of the Digital Divide.

*24/7 Access “On-the-Person”* – It is vital to define 24/7 access and use of the Internet as “on-the-person.” To meet that objective, today’s broadband delivery must first focus on the home, where individuals spend the majority of their non-working or school day. In the coming years, wireless broadband will play an increasingly important role and, therefore, the National Broadband Plan must adapt itself over the next few years to also include wireless broadband accessed through laptops, netbooks, tablets, and smartphones. 24/7 access must be in the home and on-the-person, for far too often we unintentionally relegate the poor to less optimal access. When using public funding and public policy, we need to close gaps in this 24/7 access, not rely on the barriers of time and space.

*Role of Anchor Institutions in Ubiquity* – Anchor Institutions should not be included in delivering 100% Ubiquity of availability or of subscription. Only the home and, eventually, on-the-person wireless broadband should be counted toward Ubiquity; otherwise, we will confine underserved and unserved populations to less desired and effective forms of broadband service and miss the goal of 24/7 access. Moreover, individuals should be able to search, learn, and discuss personal content, such as healthcare, in a private setting as opposed to a public space. However, One Economy recognizes the critical role that Anchor Institutions play in communities through the United States. We recognize the vital every-day broadband need in schools, health care institutions, and public safety, so we deem these as Tier One Anchor Institutions and recommend “fat pipes” into all of them. And our Tier Two Anchor Institutions – libraries, community centers, and churches – should be buttressed if they are located in underserved or unserved communities. These Tier Two Anchor Institutions should also leverage other support activities, such as digital literacy promotion or job training.

Specific Ubiquity measures that we recommend include:

- Broadband availability in 100% of the U.S.
- Affordable broadband in 100% of the U.S.
- Affordable broadband hardware in 100% of the U.S.
- Broadband subscribership in 90% of the U.S.

### **Usage**

Usage should be determined by two primary measures: the first concerning the amount of consumption – the amount of time people are using broadband, the amount of data being

consumed, and the rate of consumption – and the second concerning the content being consumed.

Two of the most important drivers of Usage are digital literacy and relevant content, and we have discussed these in detail in previous comments. Both elements must be key components of the Plan's components in regards to Usage. In a subsequent paper, we will convey our suggestions around a broad based *National Digital Literacy Initiative*, which is imperative in helping low-income, vulnerable, and otherwise underserved people overcome barriers to computer, broadband, Internet, and mobile adoption. We have also discussed in detail the vital role that relevant content plays in driving adoption, and the importance of public purpose media in delivering multi-lingual, localized, life-enhancing and life-sustaining content.

For measures in regards to the amount of broadband consumption, we recommend:

- Amount of time people are using broadband
- Amount of data being consumed
- Rate of data consumption
- Where the data is being consumed (i.e. primary sources such as the home or “on-the-person,” secondary sources such as libraries or churches, etc)

We believe that individuals should and will make their own choice as to the content that they consume. However, we urge the FCC to take into consideration the priorities of the Administration and deliver upon the Social Dividend of enhanced socioeconomic outcomes. Therefore, we would recommend the following measures as gauges for the Social Dividend:

- Usage of health content
- Usage of education content
- Usage of employment or job training content
- Usage of online government services
- Usage of public purpose media
- Usage of emergency preparation and disaster relief content

### **Utility**

We should also look at the measures for Utility (the realization of the Social Dividend) to evaluate the success of the Plan. As asserted in a Century Foundation report, the provision of broadband can provide “significant benefits for the environment, for education, for public safety, for health care, and a wide variety of other essential needs.”<sup>1</sup> Thus, as with Usage, Utility should be measured in terms of its impact and the way it motivates individuals to act on health, education, employment, government service provision, emergency preparedness, technology production, and other Administration concerns.

To buttress Utility, we need to foster individual choice, especially among underserved populations. Sustainable adoption in these groups is rooted in informed choice, and policies should be developed to remove barriers to information access, improve the dissemination of available options, and facilitate action. When provided as such, individuals will act in their own best interests.

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<sup>1</sup> Windhausen, John, Jr. “A Plan to Extend Super-Fast Broadband Connections to All Americans.” Century Foundation. January 2009.

Looking at these categories, here are some suggested components to the Plan and success gauges:

- Individual choice – willingness to pay for broadband (i.e. willingness to pay more)
- Health care – online research leads to better healthy lifestyle, disease prevention, and recovery; health records easily accessed; competition through online medium drives down costs
- Education – improvement in grades and educational attainment
- Employment – skill development increases through training initiatives; job growth through online means for underserved sectors; new businesses created
- Government services – fewer hours spent in line; fewer costs spent by government; greater access to service; expansion of e-government
- Emergency preparation – quicker response time to emergencies, enhanced service provision, fewer deaths from natural or manmade emergencies, expedited access to recovery resources; enhanced communication and coordination
- Technology production – youth trained in technology development; applications created; technology entrepreneurship

## **V. Measurement Tools | Broadband Mapping and Consumer Tools**

In addition to Form 477 and other federal data collection tools, there are several tools that could serve as excellent gauges for the Broadband Progress Board. In this section, we will discuss broadband mapping, consumer survey and consumer broadband registry, and private company measurement.

### **Broadband Mapping**

One Economy has gained significant experience in the broadband mapping arena, having developed the Broadband Information Services Consortium (BISC) to meet the federally mandated requirements around mapping states and territories. Broadband mapping should not just serve to paint a static picture of the U.S. broadband geography but rather to be used as a key tool to benchmark the ongoing success of the Plan.

To meet that requirement, we believe that broadband mapping could be improved by the following:

- Homogeneous data points – At the moment, states are collecting heterogeneous data, and the unfortunate result of this is asymmetric measurement. Homogeneous data points need to be collected to develop a baseline and measure improvement against that baseline.
- Focus on demand – The Broadband Mapping NOFA puts a very small focus on mapping obstacles to adoption, allowing for only a small amount in the Planning section of the grant. Instead, it emphasizes supply-side data such as price, availability, and speed. We recommend a larger focus on incorporating demand issues into this equation. This expanded design would increase the focus on overcoming obstacles to adoption in addition to aligning better with the Broadband Data and Improvement Act.
- Incorporate many voices – It is imperative that the FCC and NTIA's development of the broadband map also be informed by key public constituencies, such as underserved, minorities, and vulnerable populations. Civic participation, through crowdsourcing,

town halls, and surveys should also be encouraged. When we put together the BSIC , we did it with the purpose of incorporating many voices and developing a living body of work.

### **Consumer Survey and Broadband Registry**

For these products, we recommend that the FCC incorporate input from non-profits and other organizations to bolster the survey questions. As with Broadband Mapping, the survey should focus on demand, utility, and other responses that will help benchmark progress against the Broadband Progress Board, and inform policy and programmatic adjustments. The data discerned in this survey should be open for public consumption and delivered in an easily downloadable format for 3<sup>rd</sup> party use.

### **Community Assessment Surveys and Field Hearings**

To reiterate a point made in our previous comments ([GN Docket No. 09-51](#)), we recommend developing community assessment surveys and field hearings to identify key stakeholders in target communities, gain an understanding of the assets and needs of the community, hold hearings with the general population to increase civic engagement and build consensus, and then implement programs targeted to that community.

### **Civic Engagement through Public-Purpose Media**

We also discussed this topic in our previous comments ([GN Docket No. 09-51](#)), where we laid out the potential for public purpose media to serve as a forum for civic engagement and data collection. A recent Pew Internet & American Life Project report highlights the significance of this assertion: "...37% of internet [sic] users aged 18-29 use blogs or social networking sites as a venue for political or civic involvement..."<sup>2</sup> As this and future generations age in a digital society, leveraging the capabilities of the Internet and relevant public purpose content and applications to produce a civic-minded and engaged society is critical. One Economy's civic engagement website 247 Townhall ([www.247townhall.org](http://www.247townhall.org)) is an example of such a tool.

### **Corporate Measurement Tools**

The FCC should also incorporate private company tools, such as the downloadable toolbars used by M-Lab, DSL Reports, and other companies. These consumer-focused tools can serve as great resources for the FCC because of their mass usage and refined customer experience. Additionally, sources such as Nielsen and comScore could be leveraged for usage and cross-tabs on vulnerable populations, including minorities, tribal groups, and the elderly.

## **VI. The Social Dividend | Setting the Bar High for Underserved Populations**

It is imperative that low-income people receive the benefits that the next generation of broadband products will bring to society. If low-income and underserved people cannot afford, are not sufficiently aware of, and/or do not have the digital literacy competency for the technology and devices that will make an impact on their lives, then we will fail to bring this population into a society that grows and flourishes through the technology it creates. We must

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<sup>2</sup> Smith, Aaron, Kay Lehnman Schlozman, Sidney Verba, and Henry Brady. "The Internet and Civic Engagement." Pew Internet & American Life Project. September 2009.

put technology such as laptops/netbooks, smartphones, and 4G/5G connectivity into the hands of underserved populations at the very beginning. We need to create early adopters and creators among these groups instead of allowing small pockets of wealth or geography to dominate ownership and shrink our technological landscape. Setting a high bar for technology ownership and support among this population will enable marginalized populations to enter the economic mainstream and help drive American productivity. We will produce true, measurable results such as disease management with improved health outcomes, greater educational attainment among youth and young adults, financial literacy with measurable growth in personal savings and wealth accumulation, and speedier response time to natural and manmade emergencies among vulnerable populations.

### **Leapfrogging**

We delved into Leapfrogging in our previous comments ([GN Docket No. 09-51](#)) and in our “Setting Performance Measures” section above, so we will just touch upon the concept here. We recommend that the Commission consider Leapfrogging in regards to underserved and unserved populations whenever possible in developing policies, programs, or services that promote the introduction of high bandwidth, fast speed connections. At a comparatively low capital expense, we can greatly improve the lives of low-income children and communities who currently lack the access to the advantages that broadband can deliver to healthcare, education, employment, and vital public services.

### **Technology Creation**

For our children to realize the potential of technology, we must turn them into creators of the technology they consume. We have already witnessed the power of creation with the vast contributions on Facebook, MySpace, Digg, YouTube, and customer reviews. This is a good start, but it is even more important to teach youth to develop their own websites, create mobile applications, and learn how to code. The returns on technology education, taught in schools or in conjunction with digital literacy education, will surely be outstanding, resulting in greater employment opportunities at higher wages, increases in entrepreneurship, and enhanced socioeconomic outcomes.

## **VII. Customer-Centricity | A Note about Technology and Consumer Trends**

It is vital for the Broadband Progress Board to take into account the major changes that are taking place in technology and the way that consumers will react to these changes, as well as adapt their measures and strategies to meet these changing trends. The difficulty in this is that consumers often do not adequately forecast their usage of a new technology prior to their actual usage of that technology. For this reason, we recommend that the FCC demonstrate foresight by asking consumers about scenario-based predilections and also respond to changes as they happen. The FCC and the Broadband Progress Board need to set their sights ahead of the technology curve and develop strategies to encourage innovation along this curve.

A prime example of this is the AT&T Wireless release of the Apple iPhone. Before the iPhone, consumers rarely utilized the mobile Web or mobile applications, and wireless carriers and handset manufacturers took this as a signal not to rush into the development of an innovative mobile Web and mobile application experience. The iPhone results were conclusive: in February

of 2008, Google reported 50 times as many search results on the iPhone as any other handset<sup>3</sup>, and, in February of 2009, the iPhone controlled 2/3 of all mobile Web traffic<sup>4</sup>. Furthermore, a recent comScore report states that since June 2008, iPhone adoption among those earning between \$25,000 and \$75,000 increased by 46%, and that “lower-income mobile subscribers are increasingly turning to their mobile devices to access the Internet...”<sup>5</sup> Consumers had been ready to enter the mobile Web arena, but it took the new user experience of the iPhone to motivate consumers to get there and to push carriers and handset manufacturers into the space in order to capture customer demand.

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<sup>3</sup> “Google reports iPhone Usage 50x Other Handsets ...,” smoothspan, 2/18/08,  
<http://smoothspan.wordpress.com/2008/02/15/google-reports-iphone-usage-50x-other-handsets-amazon-s3-goes-down-low-friction-has-a-cost/>

<sup>4</sup> Apple iPhone controls over 66% of all mobile web use,” Katie Marsal, 3/1/09,  
[http://www.appleinsider.com/articles/09/03/01/apple\\_iphone\\_controls\\_over\\_66\\_of\\_all\\_mobile\\_web\\_use.html](http://www.appleinsider.com/articles/09/03/01/apple_iphone_controls_over_66_of_all_mobile_web_use.html)

<sup>5</sup> Press Release, comScore. “All About iPhone.” October 2008  
([http://www.comscore.com/Press\\_Events/Press\\_Releases/2008/10/Lower\\_Income\\_Mobile\\_Consumers\\_use\\_Iphone](http://www.comscore.com/Press_Events/Press_Releases/2008/10/Lower_Income_Mobile_Consumers_use_Iphone))