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September 24, 2009

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

**Re: A National Broadband Plan for Our Future, GN Docket No. 09-51;
Ex Parte Notice**

Dear Ms. Dortch:

On September 21, 2009, Comcast Corporation (“Comcast”) coordinated a meeting attended by representatives of various organizations that have expressed an interest in and a commitment to promoting adoption of broadband by all Americans and by Blair Levin and Brian David of the Federal Communications Commission. The discussion centered around the role that adoption strategies should play in the formulation and execution of the National Broadband Plan.¹

The meeting largely focused on the importance of having the National Broadband Plan address how to persuade the millions of Americans who have access to broadband Internet service but who have not yet brought it into their homes to adopt that service. At the outset, Mr. Cohen pointed out that between three and four times as many people do not subscribe to broadband because of adoption-related issues as compared to deployment-related issues, noting that various sources show that, at most, only eight percent of American households do not have

¹ Participating in the meeting were Donald Baer, Vice Chairman of Burson-Marsteller; Stephen Balkam, CEO of the Family Online Safety Institute; David Cohen, Executive Vice President of Comcast Corporation; Ralph Everett, President and CEO of the Joint Center for Political and Economic Studies; Charlie Firestone, Executive Director of the Communications and Society Program at the Aspen Institute; Sena Fitzmaurice, Executive Director of Corporate Communications and Government Relations for Comcast; Michael Gallagher, President and CEO of the Entertainment Software Association; Ellen Goodman, Associate Professor of Law at Rutgers University; David Honig, Executive Director of the Minority Media & Telecommunications Council; Robert Huber, Features Editor at *Philadelphia Magazine*; Rob Keast, Director of Outreach at Third Way; Raquel Noriega, Director of Strategic Partnerships at Connected Nation; Michael Powell, Senior Partner at Providence Equity Partners and Former FCC Chairman; Michael Riksen, Vice President for Policy and Representation at National Public Radio; Alan Simpson, Director of Policy at Common Sense Media; Calvin Smyre, Member of the Georgia House of Representatives; Gigi Sohn, CEO and Co-Founder of Public Knowledge; James Steyer, CEO and Founder of Common Sense Media; Michael Tomasky, Editor of *Democracy: A Journal of Ideas*; Nicol Turner-Lee, Vice President and Director of the Media and Technology Institute for the Joint Center for Political and Economic Studies; Joseph W. Waz, Senior Vice President of External Affairs and Public Policy Counsel for Comcast; Brent Wilkes, National Executive Director for the League of United Latin American Citizens; and Kathryn A. Zachem, Vice President of Regulatory and State Legislative Affairs for Comcast.

access to broadband (i.e., there is not a broadband Internet service going by their door), but about 37 percent of Americans do not *subscribe* to broadband according to the latest Pew Internet & American Life Project survey. Accordingly, although deployment of broadband to the remaining people who do not have access is important, the Plan must not overlook the bigger barrier to becoming the connected nation that Congress envisions, and the opportunities for successful programs that can promote adoption by those who are within reach of broadband Internet service.

We summarize here some insights and proposals raised in the meeting that may be useful to the Commission in developing the Plan and addressing the adoption problem.

- Content-based approaches to fueling adoption are critical. Content (whether in the form of information, applications, or services) is what drives consumers to the Internet and broadband. But the lack of content that is not purely for entertainment or e-commerce – in areas such as education, job training, workforce development, etc. – limits the Internet’s appeal to many consumers. The Plan should consider looking to public media outlets, partnering with government at all levels and with private sector content producers and distributors, to develop the kind of compelling content that will persuade more Americans to adopt broadband Internet services.
- If the government takes determined steps to move more service delivery online, more people will adopt broadband. Federal, state, and local governments could provide incentives, like many private corporations do, for utilizing services online, or it could provide penalties for not using services online. Either way, pointing citizens to the Internet to obtain the services they need or to fulfill necessary responsibilities – whether it be filing tax returns, registering vehicles, or voting – will help get more non-adopters to adopt broadband.
- Digital literacy is a significant barrier to adoption. For children, a formalized digital literacy curriculum in schools is needed. Private-public partnerships that utilize local organizations and their members to educate citizens in the communities they serve on how to use a computer and the Internet are also very effective at addressing digital literacy. Development of a “Digital Literacy Corps” along the lines of AmeriCorps, could go a long way to teaching people the skills they need to use broadband effectively. One Economy’s “Digital Connectors” program is another model that is being launched on significant scale across the nation.
- Lack of a computer is one of the most common reasons non-adopters give for not being online or subscribing to broadband. Programs designed to get netbooks or laptops to consumers who meet certain income criteria, along with free or reduced-cost broadband access for a certain period, is one public-private initiative the Plan should consider. Another approach could be to provide vouchers (similar to those provided to facilitate the DTV Transition) for low-income Americans to obtain computers or broadband service, though a voucher program could present budgetary challenges. One option could be to redirect current NTIA BTOP funds toward such experiments. Another option could be to provide low-income Americans with loans to obtain computers.

- Although it is unclear the extent to which concerns about cybersecurity, identity theft, privacy, malware, etc. impair the adoption of broadband, they are significant issues that the Plan should address. We cannot encourage Americans to adopt broadband and put their financial and societal security information at risk without taking responsibility for educating them about the dangers and providing them with tools to protect themselves and their families.
- Consumers who have not adopted broadband often are not aware of its benefits. There is a need for a strategic public awareness initiative to educate everyone about the benefits of broadband. The initiative should be broad and start with the President setting the tone, the government doing everything possible to build momentum, and elected officials at all levels of government getting on board to spread the word. In addition, private organizations need to develop individualized messages for specific target groups. Broadband adoption can be a cultural issue, so we need to figure out how to address cultural differences and design programs that increase the appeal of broadband to all segments of society.
- The Internet is portrayed in popular media primarily as an entertainment medium, but very little information is provided about how the Internet and broadband can improve people's lives or deliver essential services. The popular media need to embrace the Internet and broadband as a critical component of Americans' lives, and do more to enhance the image of broadband Internet service as something with great potential to change lives and boost our national goals.
- The Commission should learn from the lessons of the DTV transition, which showed how the Commission can leverage existing resources to educate and raise awareness about an issue of public concern among a large segment of the population.

The participants recognized that implementing many of these proposals will require action from Congress and coordination among the relevant agencies at all levels of federal, state, and local government. Visible support from the highest levels of the Administration, as well as buy-in and support from key constituencies in the public and private sector, will be essential to ensuring that this Plan delivers on its significant promise.

If you have any questions, please feel free to call the undersigned.

Sincerely,

/s/ Kathryn A. Zachem

Kathryn A. Zachem

Vice President,

Regulatory and State Legislative Affairs

Comcast Corporation

cc: Brian David
Blair Levin