

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

Comment Sought on International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act))))	GN Docket No. 09-47
In the Matter of a National Broadband Plan for our Future)))	GN Docket No. 09-51
Inquiry Concerning the Deployment of Advanced Telecommunications Capability to all American in a Reasonable and Timely Fashion and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act))))))	GN Docket No. 09-137

COMMENTS – NBP PUBLIC NOTICE #13

The Greenlining Institute (“Greenlining”) respectfully submits these comments in response to the Federal Communications Commission (“FCC”) National Broadband Plan (“NBP”) Public Notice #13, which seeks comments on the draft study entitled *Next Generation Connectivity: A Review of Broadband Internet Transitions and Policy from Around the World*, conducted by Harvard’s Berkman Center for Internet and Society (“Berkman Study”).¹

Greenlining commends the FCC’s efforts, and encourages the FCC to expand its inquiries to expert review of issues pertaining to broadband penetration in low-income communities and communities of color. In particular, the FCC must examine how income and inequality affect broadband penetration and utilization. Further, there must be an emphasis on programs that aim to improve digital literacy. The FCC must be abreast of *all* issues affecting *all* sectors of the American population in order to develop a fully informed NBP.

I. Introduction to Greenlining and its Advocacy For Bridging the Digital Divide

Greenlining is a multi-ethnic public policy, advocacy, and research institute based in Berkeley, CA, that advocates on behalf of California’s 25 million minorities and low-income

¹ Comments Sought on Broadband Study Conducted by the Berkman Center for Internet and Society, NBP Public Notice #13, DA 09-2217 (Oct. 14, 2009).

communities. More specifically, the Greenlining represents the interests of a diverse coalition of community-based organizations, minority-owned businesses, and civil rights organizations in California, including the state's largest African American churches, the state's largest community development organizations, and the state's largest immigrant rights group. In addition, Greenlining works with some of the nation's largest and most influential members of the minority media.

Access to quality wireless technology and broadband is essential. As such, Greenlining has extensively advocated the importance of ameliorating the digital divide at both the state and federal level. Greenlining testified on this issue alone before the California legislature, the California Public Utilities Commission, and the 17th Annual California Public Policy Conference. Today, Greenlining submits these comments to stress the importance of examining underlying demographic factors that create and perpetuate the digital divide. Greenlining encourages the FCC to create a NBP that will create a stronger economy and cultivate meaningful socioeconomic progress for the underserved.

II. Greenlining's Response to Inquiry Item #5

NBP Public Notice #13 seeks comments on whether additional studies are needed along the line of the Berkman Study. Greenlining ascertains several observations and findings from the Berkman Study that warrant further expert examination. Most notable include the finding that median income, urban concentration and poverty all contribute to explaining levels of penetration and the examination of systematic programs that aim to increase the supply *and* demand of broadband.²

- a. FCC Must Expand its Inquiry to Examine how a NBP can Effectively Target Reducing Poverty and Inequality in order to Create and Maintain a Viable Economy.

A successful NBP must address social and economic barriers to broadband access and seek ways to mitigate these barriers. The Berkman Study acknowledges “the relative importance and potential high returns to policies focused on the poor as poor, whether urban or rural, rather than on the rural as

² Berkman Study (*Next Generation Connectivity: A Review of Broadband Internet Transitions and Policy from Around the World*) at p. 37.

rural, irrespective of poverty.³ The study, however, discounts a NBP that targets reducing poverty and inequality in the United States.

The attitude that a NBP cannot address poverty or inequality is incorrect and problematic. To begin, the Berkman Study ignores the fact that increased access to technology and high speed internet encourages equal economic opportunity, educational advancement and democratic participation. These equal access factors have a direct impact on reducing inequality and improving socioeconomic mobility. Next, increased broadband penetration works directly to reduce poverty because it is undisputed that jobs lead to economic growth. Increased access and investment in broadband creates more jobs involved in the building and expansion of broadband networks. Moreover, digitally literate workers are more attractive to prospective employers, and businesses that are comfortable with digital technology are more economically competitive.

Although the Berkman Study acknowledges that poverty and inequality account for a substantial portion of levels of broadband penetration, it mistakenly determines that a NBP is independent of programs that address economic and social inequalities. These issues are critical in a NBP that aims to propel the United States into the digital generation in order to create and maintain a viable world economy. Accordingly, the FCC should commission a study to address how a NBP can effectively target reducing poverty and inequality.

- b. FCC Must Expand its Inquiry to Better Understand How Poverty and Inequality Explains Levels of Broadband Penetration because Broadband Penetration is a Centerpiece in Economy Recovery and Growth.

The Berkman Study found that median income explained the difference in broadband penetration.⁴ This element explained the difference more than urbanicity or poverty.⁵ As such, the study concludes that “interventions targeted at improving broadband penetration among poor people, urban or

³ Berkman Study (*Next Generation Connectivity: A Review of Broadband Internet Transitions and Policy from Around the World*) at p. 37.

⁴ Id.

⁵ Id.

rural, may be warranted independently of interventions aimed at addressing rural access.”⁶ Greenlining agrees with this conclusion because improving broadband penetration across all demographics is important for a successful NBP. Indeed, maximizing broadband penetration is critical to a successful NBP because it is a centerpiece in economic recovery and growth. Accordingly, the FCC should commission a study to better understand how income affects broadband penetration. This investigation will provide the FCC with data on effective interventions focused on low-income users in order to develop a successful NBP.

c. NBP Must Include Heavy Investment in Internet Education and Skills Training

The Berkman Study astutely identified that “the heavy emphasis on skills training is an important lesson carried by these international studies.”⁷ As demonstrated by the South Korean model, providing skills training and education on the importance of digital literacy is integral when establishing a NBP.⁸ It is not enough for a NBP to solely focus on supply-side of the equation in aiming to increase broadband penetration. Indeed, investing in skills training rather than merely in hardware and connectivity is critical.

In addition to creating more infrastructures, the NBP must include intervention programs to increase the demand of broadband access. Accordingly, the FCC should commission a study that focuses on the most effective ways that the United States can invest in programs that will increase Internet education and skills training.

III. Greenlining’s Research and Analysis Addressing the Digital Divide and the Depth of the Problems

Working with academics from institutions, such as USC, Stanford, Northwestern, Santa Clara University and MIT, Greenlining recently issued a report addressing the digital divide and the depth of

⁶ Berkman Study (*Next Generation Connectivity: A Review of Broadband Internet Transitions and Policy from Around the World*) at p. 37.

⁷ Id. at p. 172.

⁸ Id. at p. 171.

the problem. This report has been well received by the FCC⁹, and Greenlining respectfully provides additional comments in these proceedings in the form of the attached study entitled “Digital Inequality: Information Poverty in the Information.”

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⁹ October 2, 2009, National Broadband Plan Workshop: Diversity and Civil Rights Issues in Broadband Deployment and Adoption (http://www.broadband.gov/docs/ws_27_diversity.doc)