

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

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| In the Matter of |) | |
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| Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act |) | GN Docket No. 09-137 |
| |) | |
| A National Broadband Plan for Our Future |) | GN Docket No. 09-51 |
| |) | |
| International Comparison and Survey Requirements in the Broadband Data |) | GN Docket No. 09-47 |
| |) | |

**COMMENTS OF MABUHAY ALLIANCE (NBP PUBLIC NOTICE #16)
ON BEHALF OF 15 MILLION ASIAN AMERICANS REGARDING
BROADBAND ADOPTION: POCKETS OF ASIAN AMERICANS AT THIRD
WORLD LEVELS OF BROADBAND ACCESS, ADOPTION AND USAGE**

*“The Hmong community, America’s freedom fighters during the Vietnam War, face special problems relating to broadband illiteracy and financial hardships as it adversely affects small business/housing development and job opportunities, ” Dr. Toulou Thao,
Hmong Community Leader - Fresno.*

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Mabuhay Alliance submits these comments on behalf of our nation’s fastest growing minority group, Asian Americans.¹ We commend the Federal Communications Commission (FCC or Commission) staff for their thorough analysis of the potential problems in broadband adoption and particularly commend this Commission and Chairman Genachowski and commissioners Baker, Clyburn, Copps and McDowell for their efforts to reach out to the Asian American community.

As previously stated at meetings with Chairman Genachowski, commissioners Baker, Clyburn and Copps, and at meetings with senior staff for all five of the commissioners, the Asian American community is not homogeneous in its needs and its adoption of new technologies. Generally, Asian American sub-ethnic groups that have been in the United States for long periods of time have broadband adoption rates and literacy that equals or exceeds the population as a whole. For example, among some Asian American sub-ethnic groups, the graduation rate from college with a bachelor’s degree is 50 percent higher than the U.S. average. However, there are specific problems for our nation’s 250,000 Hmong, 250,000 Cambodians, almost 250,000 Laotians, almost 250,000 Thais, over 50,000 Indonesians and almost 300,000 Samoans, as well as some pockets of our nation’s almost two million Vietnamese Americans.² All are relatively new immigrant groups and among many, there are essentially little or no second generation American citizens.

Among these seven Asian American groups, the largest concentrations are in California, where, for example, there are over 700,000 Vietnamese Americans.

Mabuhay Alliance and the leadership from many Asian American organizations such as the Korean Churches for Community Development and the (Vietnamese) Economic Business Development, Inc., concur that there are pockets among all Asian American groups that do not have access to effective broadband capability. But we all concur that the greatest problems, ones where this Commission, with the assistance of Silicon Valley and telecommunications companies, could make the greatest difference, are among the Hmong, Cambodian, Laotian, Indonesian, Vietnamese and Samoan communities.

¹ This is a short-hand for another commonly used term Asian Pacific Islanders.

² Our demographic expert has extrapolated from 2006 data, used growth rates from 2000 to 2006 and adjusted for historical census undercounts.

National Program

"The Japanese American community is in a position and is committed to assisting the FCC and assisting the underserved Asian American communities," Jason Akira Hobson, Japanese American Bar Association.

Ordinarily, we would urge that the State of California play a major role given that the seven identified groups are disproportionately located in California. However, California is facing a unique budgetary crisis that is affecting its educational system from kindergarten to its once great university system. This will, particularly, albeit inadvertently, cause great hardships to immigrant groups and deal harshly with new immigrant groups including the seven previously identified Asian American groups. We therefore urge, a centralized federal government effort from D.C., much as the French educational system is directed by the national government from Paris. This is consistent with the American Recovery and Reinvestment Act of 2009 (Recovery Act) and its national goals.

Missing Data

Although Asian Americans as a whole have a lower unemployment rate than the national average, this is not the case for most of the sub-ethnic groups identified herein, such as the Hmong, who are concentrated in rural areas with real unemployment rates well above 20 percent.³ As Mabuhay Alliance set forth in its November 20th comments on the 2010 Quadrennial Regulatory Review proceeding, data on key elements of the Asian American community are not readily available. We therefore urge that the FCC itself work with Mabuhay Alliance and sub-ethnic groups identified herein, plus the very large Filipino American, Chinese American, Japanese American and Korean American groups, to gather crucial data.

³ California's real unemployment rate as of October 2009 was 21.9 percent, but in the San Joaquin Valley where virtually all California Hmong reside, the real unemployment rate was well above 30 percent. Unfortunately, neither the federal government nor the state of California provides data by sub-ethnic group and California has no data broken down by race or ethnicity.

Number One in Broadband by 2014

“The Korean American community can assist America in catching up to South Korea and Japan in broadband access, adoption and usage,” Hyepin Im, President of the Korean Churches for Community Development.

The goal of Mabuhay Alliance and the Asian American community is to ensure that by any measure of broadband access, adoption and usage, America is Number One. We therefore suggest that this Commission invite leaders from South Korea and Japan (currently among the top three in broadband services worldwide) to meet with the Commission and the Pan Asian American community and other minorities to develop a plan that will enable us to be Number One within five years.

We urge that the funding to achieve this should come from a combination of government and private sources.⁴ This includes Google, Amazon, eBay, Microsoft, Intel, Cisco and Oracle. This should also include the major networks that are beneficiaries of FCC policies such as ABC, CBS, Fox and their holding companies, as well as cable companies such as Comcast.

An example of what could be done regarding broadband access, adoption and usage are the programs adopted by the California Public Utilities Commission (CPUC) with AT&T and Verizon, in which the two companies contributed 60 million dollars to a broadband fund that is now being run by a nonprofit that focuses on underserved communities. It is grossly underfunded, largely because other industries affected by the FCC but outside CPUC jurisdiction have failed to contribute.

Specific Questions

“If the American government and the FCC knew as much about our Indonesian Americans as it knows about Bali, we would not be outside the broadband network essential to our future,” Nina Jusuf, Executive Director of Transformasi.

Due to the lack of sufficient funding and the absence of a D.C. office (Mabuhay Alliance will open its D.C. office by March 2010), Mabuhay Alliance is unable to provide detailed responses with specific numbers for many of the cogent questions raised in “measuring broadband adoption,” “cost of digital exclusion,” “barriers of adoption,” “overcoming barriers to adoption,” and “learning from existing programs.” However, we offer initial observations regarding these five areas.

⁴ Government sources could include economic stimulus funds, micro-business development funds, job training funds, health care funds and educational funds, since all of these areas are affected by broadband access, adoption and usage. As for industry participation, a wide range of industries have poor public policies relating to any form of literacy or education as it affects the Asian American community and particularly the Hmong, Cambodian, Laotian, Indonesian, Vietnamese and Samoan communities. And, these industries also have similarly poor policies relating to the Korean American, Filipino American, Chinese American and Japanese American communities

Firstly, this Commission should quickly develop a task force that includes Asian Americans, including from disadvantaged Asian American communities, to survey and measure the scope of access, adoption and usage inadequacies and their costs. We, however, believe the costs are far less than the costs of remaining 15th in the world in broadband access and having third world broadband access for groups such as the Hmong community, who were America's freedom fighters during the Vietnam War.

Regarding what benefits of having broadband are lost to those without such access, we urge a special study of the Hmong community in California and perhaps Minnesota and Wisconsin, where there are also large concentrations of Hmong. The Hmong community is committed to assisting and cooperating in this effort.

The Commission may wish to understand why some consumers who have access to broadband do not adopt broadband. In part, this is because their neighbors have similar disabilities or what might be called "broadband illiteracy." We therefore urge a National Digital Literacy Corps. We believe that it could be led in part by Asian Americans who are secured from the resources of Americorps. The Hmong community in California for example, has indicated that it would welcome up to three National Digital Literacy Corps volunteers.

Mabuhay Alliance also suggests that since broadband access, adoption and usage is particularly low among new immigrants, the Department of Justice and the INS could play a key role in welcoming new immigrants to this country with free and easily accessible broadband literacy classes. This could best be funded by corporations such as Google, Microsoft and Amazon, and foundations such as the Gates Foundation.

The best starting points for training, particularly among the Asian American sub-ethnic groups identified, would be within their community organizations. For many of these groups one of the most effective community organizations are their churches.

Mabuhay Alliance is very familiar with national and state lifeline programs for telephone usage. And its President and CEO serves on the Low-Income Energy Oversight Board for the CPUC and as a community advisor for a corporation with extensive outreach programs to low-income minorities, Sempra Energy. These programs are not in their present form readily adoptable to lifeline subsidies or usage for broadband. However, they can be modified and we believe that the CPUC senior staff would be willing to work with us and the FCC to achieve the laudable goals of the Recovery Act, particularly in the context of this Commission's position on broadband as it relates to telecommunications companies such as AT&T and Verizon.

Inadequate Media Outreach

“The Vietnamese American community is the third largest Asian American community in America. But unfortunately, we are often treated by the media and government as an obscure footnote,” Lynn Dangtu, Founder, President and CEO of the (Vietnamese) Economic Business Development, Inc.

One issue not directly addressed in this proceeding is the role of media outreach. The media have the power, partly through direct and indirect promotions to help develop broadband literacy among new immigrant groups. Characters, for example, on TV sitcoms who are Asian American could make references to the advantages achieved by broadband literacy, access, adoption and usage. Unfortunately, as this Commission is aware, there are inadequate minority media outlets and the major media offer few Asian American role models. And, to our knowledge, they offer none to the Hmong, Cambodian, Laotian, Indonesian, Vietnamese and Samoan American communities and virtually none for the Filipino American or the Korean American communities.

Respectfully submitted,

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