



December 2, 2009

Chairman Julius Genachowski
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Comment Sought on Broadband Adoption – NBP Public Notice # 16
GN Docket Nos. 09-47, 09-51, 09-137**

Dear Mr. Chairman and Commissioners:

Common Sense Media hereby submits its response to the Commission's request concerning Broadband Adoption – NBP Public Notice # 16 – GN Docket Nos. 09-47, 09-51, 09-137. Common Sense Media is the nation's leading non-partisan organization dedicated to improving the media lives of kids and families. Our programs include educating and empowering parents and teachers on how to understand and manage what children see, hear, create and share with the Internet and digital media. Common Sense provides information about digital literacy and media education in schools and community settings, as well as trustworthy ratings and reviews of all forms of media (movies, television, video games, music, books, apps, etc) through our comprehensive Web site and other platforms, helping millions of families and educators decide what media and technology are appropriate for children.

In past comments, Common Sense Media has outlined how successful broadband implementation can't be just about wiring and hardware. In the same way, successful broadband implementation cannot be measured only by counting connections. Broadband investment won't really bring the rewards we need unless we foster sustained adoption and smart use. We must overcome the barriers to adoption, particularly those related to relevancy and technology and digital literacy skills. But sustained adoption also requires that we address parent and teacher concerns about the potential dangers of the digital media world. We must build awareness of the benefits of broadband, the Internet and digital technology, while also preparing our children – and their parents and teachers – to make smart and safe choices about what they learn, share and create in the broadband world.

Defining Digital Literacy

In question 4.b of this Public Notice, the Commission asks

What programs and policies should the federal government adopt to educate consumers and increase technology and digital literacy skills to ensure that individuals have sufficient ability to use hardware and navigate and process digital information and broadband-enabled applications?

In this Public Notice, digital literacy is defined primarily as technical skills involving the usage of hardware, software and applications.¹ In order to harness the power and the potential of this increasingly digital world, digital literacy must be defined as more than just technical skills.

Digital literacy must include

- Technical literacy – the ability to use hardware and navigate and process digital information and broadband-enabled applications.²
- Information literacy – the ability to access and manage information.
- Media literacy – the ability to analyze, evaluate and create messages in a variety of media modes.
- Digital citizenship – the ability to use digital media and technology responsibly, ethically, and effectively.

The Need for Digital Literacy and Citizenship

As we have noted in prior comments,³ to prepare our children to live, learn and thrive in a digital media world, America needs digital literacy and citizenship programs that will help children understand how digital media impacts the way they socialize, communicate, gather and process information, participate in political and economic life, and form opinions and values. Families and educators need to help children learn how to be media savvy and safe, to search for age appropriate content, and to be careful and ethical with regard to their own digital conduct. And to do this, parents and teachers need guidance and training as well.

There are several steps to developing comprehensive digital literacy and citizenship programs for every school and community in America, and they should all be part of the National Broadband Plan:

1. Fund professional development for educators.
2. Create basic resources for educating teachers, parents, and kids, and help schools and community programs access them.
3. Deliver education/technology resources in underserved schools and communities.
4. Make digital literacy and citizenship essential parts of every school's basic curriculum.
5. Ensure strong interagency coordination.⁴

¹ See Question 5.d – For programs that include digital literacy training, what is the curriculum? Which of the following categories of digital literacy subject matter are addressed by the program?

- i. hardware usage
- ii. software and applications usage
- iii. web navigation
- iv. managing and assessing the quality of online content
- v. purchase of hardware (specs) and broadband service that fit the program participant's technology needs and budget

² Public Notice #16, Question 4.b.

³ See Re: A National Broadband Plan for Our Future – GN Docket No. 09-51 – filed June 8, 2009 – accessible at <http://fjallfoss.fcc.gov/ecfs/document/view?id=6520219932> (accessed December 2, 2009); Re: Broadband Needs in Education, Including Changes to the E-Rate Program to Improve Broadband Deployment – GN Docket Nos. 09-47, 09-51, 09-137; CC Docket No. 02-6; WC Docket No. 05-195 – filed November 20, 2009 – accessible at <http://fjallfoss.fcc.gov/ecfs2/document/view?id=7020349466> (accessed December 2, 2009).

⁴ For further detail see Digital Literacy and Citizenship in the 21st Century, a Common Sense Media White Paper – <http://www.common Sense Media.org/digitalalliteracy>.

One federal program where digital literacy and citizenship education can be promoted is the Enhancing Education through Technology (Ed-Tech) State Program.⁵ The primary goal of this program is to improve student achievement through the use of technology in elementary and secondary schools. An additional goal of the program is “to assist every student in crossing the digital divide by ensuring that every student is technologically literate by the time the student finishes the eighth grade.”⁶ However, no definition for technology literacy is given in the law, nor in guidance from the Department of Education.⁷

The National Broadband Plan should encourage the Department of Education to define technology literacy and to include digital literacy and citizenship as part of that definition. In addition, the National Broadband Plan should recommend similar changes in the authorizing language for the Ed-Tech program.

The Ed-Tech program is also woefully underfunded. A significant increase in funding for technology and digital literacy education and professional development is critical to our nation’s economic future, and to sustained adoption and smart use of broadband. We must acknowledge digital literacy and citizenship as a national priority, and the National Broadband Plan should commit at least \$500 million annually for comprehensive digital literacy programs for America’s kids, schools and communities.

The nation whose children best harness the educational and creative powers of digital media will write the economic and educational success story of the 21st century. Digital media is changing the ways that kids live and learn – and the changes can create opportunities or pose potential dangers. We need to fund teachers, curricula, and parenting tools that prepare kids and adults to better understand and manage media’s role in their lives. The emerging fields of digital literacy and digital citizenship are essential investments in our children’s future, and should be at the heart of the National Broadband Plan.

Digital Literacy Standards and Curricula

In question 4.b of this Public Notice, the Commission asks

- i. Should the government establish nationwide standards for digital literacy? How would such standards be measured?*
- ii. Many states have started to implement digital literacy standards and curricula. Should the federal government do more to standardize these initiatives?*

⁵ Elementary and Secondary Education Act of 1965, as amended, Title II, Part D. See <http://www.ed.gov/programs/edtech/index.html>.

⁶ ESEA, Title II, Part D, Sec. 2401(a)(2)(A).

⁷ See Final Guidance on the Enhancing Education Through Technology (Ed-Tech) Program (March 11, 2002) and Guidance on Enhancing Education through Technology (Ed Tech) Program Funds Made Available under the American Recovery and Reinvestment Act of 2009 (July 2009) at <http://www.ed.gov/programs/edtech/legislation.html> (accessed December 2, 2009).

Mandatory nationwide standards for digital literacy would be hard to develop, and even harder to keep up-to-date with changes in the digital media world. A better role for the federal government would be providing guidance and assistance to states and school districts, such as by

1. Including digital literacy in the National Education Technology Plan, currently being developed by the Department of Education to provide a vision for how information and communication technologies can help transform American education.⁸
2. Encouraging the National Governors Association (NGA) and the Council of Chief State School Officers (CCSSO) to include digital literacy and citizenship as part of the Common Core State Standards Initiative.⁹
3. Encouraging states to integrate 21st century skills, such as critical thinking, problem solving and communication skills, into core academic subjects, such as through adoption of the Partnership for 21st Century Skills framework.¹⁰
4. Creating a working group – including education groups, internet safety groups, and other relevant experts in new media, along with representatives of relevant government agencies – to identify best practices and develop guidance for states and school districts.
5. Developing and maintaining a list – through the Department of Education, Department of Health and Human Services, or Federal Communications Commission – of digital literacy and citizenship programs that meet the guidance provided by the working group above.
6. Funding – as noted above, in order to ensure that our nation’s investment in broadband produces the most benefit to the country, we must work towards both sustained adoption and smart use, and we must dedicate significant funding for comprehensive digital media literacy programs for America’s kids, schools and communities.

Ensuring Non-Students Acquire Digital Literacy Skills

In question 4.b.ii of this Public Notice, the Commission asks

How can the federal government ensure that individuals no longer in school acquire and maintain these skills?

Through comprehensive digital literacy and citizenship education, parents and educators will learn how to help children make smart decisions about what they watch, read, create and share. Parents and educators will also develop their own digital literacy skills.

Parents and teachers across the country need training and preparation in the fundamentals of digital literacy and citizenship. Many of today’s parents and teachers lag behind kids in understanding and using technology and digital media. Teachers must understand the basic technologies and applications, as well as what their students are doing with them, if they are to teach 21st-century skills and ethics successfully. By using digital media and technology to break down the walls between formal learning environments (schools) and informal learning

⁸ <https://edtechfuture.org/>

⁹ <http://www.corestandards.org/>

¹⁰ http://www.21stcenturyskills.org/index.php?option=com_content&task=view&id=254&Itemid=120

environments (homes, after-school programs, libraries, community programs) digital literacy programs will improve the education of children, and help many more adults develop digital literacy skills as well.

National Digital Literacy Corps

In question 4.b.iii of this Public Notice, the Commission asks

Should the federal government create a national digital literacy corps comprised of individuals who conduct outreach and training programs in communities with very low adoption rates?

The federal government should create a national Digital Teacher Corps – along the lines of AmeriCorps and Teach for America – for on-site educator training. These Digital Teachers would provide professional development and in-service training for educators and staff in community programs, helping them improve their facility with technology and media, and with basic tenets of digital learning. The Digital Teacher Corps would create jobs and career opportunities for recent college graduates, and bring tech-savvy young adults into schools and community programs, where they could mentor students while also coaching faculty.

However, it is important to note that teachers across the country need training and preparation in the fundamentals of understanding and using technology and digital media. The Digital Teacher Corps must be part of a larger program of professional development and support for existing teachers, who can bring digital literacy skills to many more students.

Federal Outreach Campaign

In question 4.c of this Public Notice, the Commission asks

Would a federal outreach campaign utilizing multiple types of media to disperse information about broadband, including its relevance and utility, be effective in increasing adoption and usage rates? What types of messaging should a federal outreach campaign include?

Broadband, technology and digital media are critical components for building 21st century skills in schools and for building a promising economic future for America's youth. Moreover, the cost of digital exclusion is large and growing, and as such, our national investment in broadband must foster broadband adoption in *all* communities. To that end, an innovative and effective public awareness and education campaign must be a critical centerpiece of the National Broadband Plan.

Today, millions of Americans fail to receive the educational and economic benefits of broadband. Many fail to recognize the opportunities broadband can create, and millions more have concerns about their children accessing inappropriate or indecent content. In short, an overall lack of awareness about the value of broadband, coupled with concerns about potential problems, keeps millions of Americans from adopting broadband. This puts them and their children at risk of falling even further behind in the increasingly digital world of the 21st century.

The nation must take two coordinated steps to change these perceptions and to increase broadband adoption in underserved communities:

1. A Targeted National Public Awareness and Education Campaign – built with significant partnerships with the media industry – promoting the positives of broadband and reassuring families and communities about how they can manage the potential negatives, and
2. A Connected Outreach Campaign with schools and community groups, providing digital literacy tools and information that will help families, teachers and other local leaders use broadband in safe, responsible and productive ways.

A detailed proposal for a Broadband Opportunities Awareness Campaign was submitted to the Commission on November 23, 2009 in re: A National Broadband Plan for Our Future, GN Docket Nos. 09-51, 09-137.¹¹ In this proposal, we outline

- Key Audiences to Reach
- Media Strategies for Reaching Key Audiences
- Key Campaign Messages and Themes
- Partnering with Major Media Companies
- Partnering with Schools and Community Groups for On the Ground Outreach
- Ongoing Outreach with Community and Advocacy Organizations Leadership from Policymakers and Government Institutions
- Budget Outline in Brief

Measuring the Success of Programs

In question 4.h of this Public Notice, the Commission asks

How should the success of each program or policy be measured, what data is necessary to evaluate success and how should such data be collected?

As noted above, successful broadband implementation cannot be measured only by counting connections, which may not last, and may not improve education, healthcare, job opportunities, and other national purposes. Broadband investment won't really bring the rewards we need unless we foster sustained adoption and smart use. We must overcome the barriers to adoption, particularly those related to relevancy and technology and digital literacy skills. But sustained adoption also requires that we address parent and teacher concerns about the potential dangers of the digital media world. We must build awareness of the benefits of broadband, the Internet and digital technology, while also preparing our children – and their parents and teachers – to make smart and safe choices about what they learn, share and create in the broadband world.

Learning from Existing Programs

In question 5 of this Public Notice, the Commission asks for examples of successful programmatic efforts to address broadband adoption and usage. Question 5.d inquires about programs that include digital literacy training and their curriculum.

¹¹ Accessible at <http://fjallfoss.fcc.gov/ecfs2/document/view?id=7020349837> (accessed December 2, 2009).

Common Sense Media creates and distributes a variety of media education and digital literacy materials for parents, students and educators. Through our website, we provide information and advice to millions of parents and educators about media and technology issues – including articles, toolkits and other resources. In November 2008 we launched our free Common Sense Schools program,¹² providing schools with tools to run media education programs for parents and teachers. One sign of the great need for these tools is that nearly 5,000 schools nationwide have registered for the program in the first year.

In addition, many educators have asked for materials they can use to teach their students how to be responsible digital citizens. In response, Common Sense Media is creating a school-based curriculum designed to instruct K-12 students (starting with middle school children) in the essentials of positive media usage. Through lesson plans, online games, videos, and other resources, Digital Literacy: Citizenship in a Connected Culture will empower young people to be responsible and respectful as they navigate the digital world.

For more information on the methodology, development, components and partners involved in creation of this new curriculum, please see our November 20, 2009 filing in Re: Broadband Needs in Education, Including Changes to the E-Rate Program to Improve Broadband Deployment – NPB Public Notice # 15 – GN Docket Nos. 09-47, 09-51, 09-137; CC Docket No. 02-6; WC Docket No. 05-195.¹³

Conclusion

Broadband can help America continue to close the digital divide in education and economics by bringing valuable resources and opportunities to all our children, in every community, but only if we foster sustained adoption and smart use. In order to overcome the barriers that are keeping underserved communities from adopting broadband, the National Broadband Plan must include comprehensive digital media literacy programs for America’s kids, families, schools and communities.

Through digital literacy and citizenship education, we can ensure that every American child has the knowledge, ethics, and skills needed to harness the educational and economic power of the digital world, and to avoid its potential dangers. Working together, we must create the teaching and parenting tools that will enable us to educate, empower, and protect our children, and bring teachers and parents up to speed as well. As we noted in our June 8, 2009 filing re: A National Broadband Plan for Our Future¹⁴ a National Broadband Plan must

- Help families and schools learn how to find quality educational content online and on other digital platforms;
- Encourage the creation and dissemination of more and better quality educational content;

¹² <http://www.commonsensemedia.org/educators>

¹³ Accessible at <http://fjallfoss.fcc.gov/ecfs2/document/view?id=7020349466> (accessed December 2, 2009)

¹⁴ Common Sense Media Comments to FCC re: A National Broadband Plan for Our Future – GN Docket No. 09-51, June 8, 2009 – accessible at <http://fjallfoss.fcc.gov/ecfs/document/view?id=6520219932> (accessed December 2, 2009).

- Ensure that all Americans have access to easy-to-use tools, information and technology they need to make the most of the educational, economic and social opportunities online; and
- Promote basic digital literacy and citizenship skills among all Americans as we move into this new digital era.

Digital literacy and citizenship for children and families must be a national priority. We must provide the tools, guidance and training necessary to ensure that all of America's kids can access and utilize the educational and economic power of the digital world, and the National Broadband Plan is the place to start. We call on you to commit at least \$500 million annually for comprehensive digital literacy programs for America's kids, families, schools and communities. If we invest wisely in the digital media literacy and education that need to accompany broadband, we will create new jobs, encourage adoption of broadband, and prepare our children for the high tech jobs of their global future.