

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

In the Matter of)	
)	
Inquiry Concerning the Deployment of)	GN Docket No. 09-137
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)	
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
International Comparison and Consumer Survey)	GN Docket No. 09-47
Requirements in the Broadband Data)	
Improvement Act)	

**COMMENTS OF MABUHAY ALLIANCE (NBP PUBLIC NOTICE #18)
FCC SHOULD HELP UNDERSERVED COMMUNITIES GATHER
REQUESTED DATA ON BROADBAND**

“The Hmong are too poor to effectively gather the data to prove that they are without effective, quality broadband services. The government should come and do its own survey with our cooperation,” Dr. Toulou Thao, Hmong Community Leader - Fresno.

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December 3, 2009

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“The Hmong are too poor to effectively gather the data to prove that they are without effective, quality broadband services. The government should come and do its own survey with our cooperation,” Dr. Toulou Thao, Hmong Community Leader - Fresno.

On behalf of 15 million Asian Americans, we iterate the support set forth in our December 1st comments on the need for the United States to be Number One in broadband and to ensure that minorities, including many Asian American sub-ethnic groups, not be left behind. (“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”)

In general, we support the Federal Communications Commission securing the information contained in this docket which asks 43 detailed questions on “community hubs,” “business adoption and usage,” “broadband’s role in regional economic development,” “government-provided social benefit programs” and “workforce development.” These questions can easily be answered by Fortune 500 corporations such as Amazon, Google, Microsoft, and probably Wal-Mart. And it is possible that other large corporations could also be of help to this Commission. Unfortunately, a comprehensive response to the details of the FCC questions requires a nonprofit or a truly small business to set aside two to three workers for a month or more to provide sufficient information to be helpful to this Commission.

We therefore make the following recommendation regarding data gathering:

The 98 percent of businesses with 25 or fewer employees should be put in a different category than businesses with 450 employees and annual revenue of 100 million dollars or more. These small businesses (approximately 98 percent of all businesses) should be provided with the financial resources to ensure that the Commission has complete answers to the crucial questions raised in this docket.

Similarly, except for nonprofits the size of the Ford Foundation or the Rockefeller Foundation, our nation’s over 800,000 nonprofits lack the staff resources to provide comprehensive responses. This includes Mabuhay Alliance. In order for us to respond in an accurate and comprehensive fashion and to secure the vital information requested, we would have to take a minimum of two employees working to prevent foreclosures from their jobs for at least one month.

On behalf of the 98 percent of all businesses that have 25 or fewer employees (truly small businesses) and the 99 percent of nonprofits that lack huge endowments but are truly grassroots, we will, if the FCC and the senior staff are interested, propose a cost efficient system to ensure full and adequate comments.

I. Community Hubs Must Be Expanded to Include Churches and Low-Income Health and Foreclosure Clinics

“Our nation’s 1.3 million Korean Americans rely on our churches for a wide range of information and services, and churches could well be a center for broadband expansion,” Hyepin Im, President of the Korean Churches for Community Development.

One key organizational group left out of this discussion are the hundreds of thousands of churches that are often the educational center for millions of Americans. They may be as important in particular communities as libraries and are far more important than community colleges or job training centers.

Another organizational center that has been left out are the thousands of foreclosure prevention centers being used by the 12 million American families facing foreclosure. Mabuhay Alliance, for example, operates foreclosure centers in many cities in California and Nevada and a major intermediary that it works with, HomeFree USA, has 66 affiliate organizations across the country addressing the foreclosure crisis.

Another community hub that is inadvertently left out of the definition are the over 7,000 low-income nonprofit health care centers around the nation. They are being supplemented by for-profit low-income health centers such as those operated by Wal-Mart and Walgreens.

Another key resource are microbusiness enterprise centers such as CAMEO, who has over 80 members throughout the state of California. (A microbusiness is defined as five or fewer employees, and CAMEO states that the national estimate of microbusinesses is approximately 24 million and growing.)

II. Business Adoption and Usage

Please see above responses. We stress again, however, that there are 24 million truly small businesses and that number is growing as the jobless begin to tap into their entrepreneurial skills. This group is likely to have great need for the use of broadband and is in the least position to have high-quality broadband access and usage.

III. Broadband's Role in Regional Economic Development

Please see above responses. Broadband could be used to assist local communities and regions in competing in a zero-sum game to attract new businesses. But, in general, we oppose this zero-sum approach. Instead, we prefer an approach that unifies America and ensures full broadband access, adoption and usage at the highest current levels. (See, for example, the unfortunate advertising duel between AT&T and Verizon over cell phone connectivity.)

IV. Government-Provided Social Benefit Programs

“A logical place to provide broadband access would be the thousands of foreclosure prevention centers created by nonprofits around the nation to save 12 million American families from foreclosure,” Marcia Griffin, President of HomeFree USA.

Please see above responses. Mabuhay Alliance urges that the government itself through: (a) TARP funds, (b) economic stimulus funds and/or (c) job training funds, pay for a comprehensive study in which organizations serving our nation's Asian American communities will happily cooperate. For example, it is impossible for any organization to determine, as set forth in section IV-b, the percentage of individuals who currently receive federal benefits and who have access to broadband. The number of food stamp families, for example, has doubled in the last few years, including sections of America where 40 percent or more of children are receiving food stamps. (See New York Times article of November 29th entitled, “Food Stamp Use Soars, and Stigma Fades.”)

Similarly, it is impossible for any nonprofit to determine the current Administration's costs for key benefit programs. Mabuhay Alliance believes that the administrative costs are in the multi-billions of dollars (question IV-c).

V. Workforce Development

Federally supported job placement programs are outdated. They train Americans for jobs that no longer exist or only exist in low-cost underdeveloped nations. A significant portion of job training funds and ineffective placement funds should instead be made available to ensure that America is Number One in broadband. This could include, for example, a pilot broadband program for the Hmong community in California.

VI. Conclusion

On behalf of 15 million Asian Americans, we commend the FCC for its preliminary efforts to gather data to ensure that America is Number One in broadband. However, we believe that the crucial data, the grassroots data, the data from 98 percent of all American businesses (small businesses) and the data from 99 percent of all nonprofits will not be gathered in an effective fashion without the government providing sufficient resources to ensure that the questions asked in this docket are effectively addressed.

An alternative funding source would be for a major foundation, such as the Gates Foundation or Fortune 500 foundations involved in education and broadband to fund this data gathering. Amazon, Google, eBay, Microsoft, Intel and Cisco would be a logical place to start.

Respectfully submitted,

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Dated: December 3, 2009