



January 25, 2010

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Portals II, Room TW-A325  
Washington, DC 20554

**Re: GN Docket Nos. 09-47, 09-51, 09-137**

Dear Ms. Dortch:

USTelecom submits this letter to recommend that the National Broadband Plan support development of a test project to provide an academically rigorous evaluation of concepts that effectively increase broadband adoption by low-income households.

It is important that an adoption strategy be right from the start, efficient, effective, implementable and auditable, which is difficult or impossible without proper design from the outset. Although today many broadband providers and organizations are making admirable efforts to increase adoption, we are not aware of any uniform and comprehensive study comparing the impact and efficacy of these programs, nor do the programs now in existence necessarily include all the elements that should be evaluated to determine the optimal strategies to increase sustainable adoption. Even the most definitive data that is available about adoption – the Pew survey work – does not contain much guidance as to how to increase adoption in various segments of society. Developing test beds to fill in those conceptual gaps and assembling and evaluating the resulting data are important steps in the Commission’s consideration of strategies to increase broadband adoption.

USTelecom proposes a project that would gather actionable information for the FCC regarding effective methods to increase adoption by low-income households. This project would test a variety of approaches and gather concrete and statistically significant data about what works best to overcome the barriers to adoption for low-income households. Solid data on current initiatives, along with that developed from establishing test beds for new initiatives, should be used to inform forward movement on any nationwide program. Potentially, these test beds and data gathering would be implemented in conjunction with outreach organizations and hardware manufacturers and broadband service providers. This project ideally would be implemented under a construct developed in conjunction with an academic institution or a consumer advocacy organization focused on producing meaningful data on broadband adoption in a relatively brief period of time.

Marlene H. Dortch

January 25, 2010

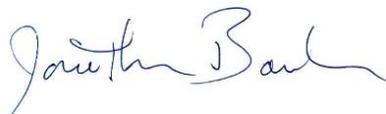
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Important test bed elements that should be assessed for their effect on adoption by low-income households would include discounts on broadband service, discounts on hardware (e.g.; computers, modems), digital literacy programs, provision of relevant content and education on the benefits of broadband. While the final three elements could be common to all test beds, various combinations and subsidy levels for hardware, connectivity and potentially other variables could be tested and evaluated. Relevant data could be gathered from both rural and urban populations, and relevant demographic groups within those populations.

USTelecom and a broad array of its members are committed to investing resources to design this project and to support it on a scale required to develop actionable data. We know this is critical data in support of a national broadband plan and would expect to have data ready for review by early in 2011. While we will contribute real resources to the study in the form, for example, of discounts on broadband services, we believe that additional money will be needed to support the academic research needed to make the program a success. (We believe this funding could come from a number of sources including available stimulus dollars, but we recognize that universal service funds cannot be used for this type of project.) The final report that is submitted to the Commission will include specific recommendations, steps and timelines to ensure the success of full scale programs going forward. With this data and rigorous analysis in the short run, federal policymakers and industry will be able to better design comprehensive policies that support sustainable broadband adoption among all low-income users.

Pursuant to Commission rules, please include this letter in the above-referenced dockets.

Sincerely,

A handwritten signature in blue ink that reads "Jonathan Banks". The signature is fluid and cursive, with the first name "Jonathan" and last name "Banks" clearly legible.

Jonathan Banks  
Senior Vice President, Law & Policy

Cc: Elise Kohn  
Carol Matthey