

October 27, 2011

VIA ECFS

Hon. Julius Genachowski, Chairman
Hon. Michael Copps, Commissioner
Hon. Robert McDowell, Commissioner
Hon. Mignon Clyburn, Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Universal Service Reform (Connect America Fund, WC Docket No. 10-90); A National Broadband Plan for Our Future, GN Docket No. 09-51; Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135; High-Cost Universal Service Support, WC Docket No. 05-337; Developing a Unified Intercarrier Compensation Regime, CC Docket No. 01-92; Federal-State Joint Board on Universal Service, CC Docket No. 96-45; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Lifeline and Link-Up, WC Docket No. 03-109) (ex parte)

Dear Chairman Genachowski and Commissioners:

CFY and Technology Goes Home (TGH) encourage the Commission to seek further comment on Blair Levin's ex parte letter of October 19, 2011¹ as we strongly support the concept he laid out regarding broadband adoption.

As organizations with on-the-ground experience implementing broadband adoption programs, we can provide a well informed perspective. Mr. Levin makes several points, which merit repeating.

- "...as part of the National Broadband Plan, we determined that there were a number of barriers to adoption, such as digital literacy, that would not be addressed simply by reforming the Lifeline/Link-up program to support low-income persons purchasing broadband devices and services."
- It is "good to build on the lessons learned from NTIA's recent investment in a number of adoption related programs..."
- Adoption is "critical to achieving the purposes of Universal Service and that the government should adjust its expenditures through the Universal Service fund to reflect the heightened priority of adoption."

First, we agree with Mr. Levin that cost is only one of the barriers to adoption. Many prior broadband discount programs have been plagued by low sign-up rates. Both TGH and CFY make discounted broadband available to low-income families using a model that gets results. TGH and CFY are considered two of the top performing organizations in NTIA's Broadband Technology Opportunities

¹ See Ex Parte Letter to Secretary Marlene H. Dortch from Blair Levin, Fellow, Communications and Society Program, The Aspen Institute, Federal-State Joint Board on Universal Service, CC Docket No. 96-45 et al. (filed October 19, 2011).

Program (BTOP). The broadband adoption rates we are seeing among the low-income families we serve in New York City, Boston and Los Angeles are the most competitive in the nation. In New York City, CFY offers its discounts through Cablevision and TWC. In Boston, TGH offers its discounts through Comcast. All three providers are pioneers in establishing precedent-setting partnerships to increase broadband adoption. In the case of TGH, we served nearly 1,400 families and an additional 500 community members in FY10-11 and saw adoption rates climb to nearly 90%. CFY served almost 9,000 families in FY10-11 and saw adoption rates climb to 90%.

The experience of both TGH and CFY demonstrates that discounts are not enough. Based on our experience, there are two other major barriers that a broadband adoption program must address, and that the FCC should ensure can be supported as it develops its own broadband adoption programs:

1. Lack of relevance and training
2. Inefficient outreach strategies

1. Addressing lack of relevance and training: Both TGH's and CFY's programs make broadband relevant to families by reinforcing the value of broadband for digital learning and school achievement. This approach is highly effective because all parents want what is best for their children, and know education is critical for their children's success. In fact, we would argue that, of all the ways to make broadband relevant for non-adopters, demonstrating to them that broadband will help their children achieve in school is one of the most powerful. In order to best demonstrate relevance for non-adopters, we have found training to be the best vehicle. Both TGH and CFY make training a centerpiece of their programs. It is through hands-on training that families learn about the relevance of broadband for improving their children's success in school.

2. Addressing inefficient outreach strategies: There are numerous examples of broadband programs that have had difficulty getting non-adopters to sign-up. Even when training is offered for free, few families take part unless they have a deep relationship of trust with the organization providing it. TGH and CFY address this issue by partnering with schools (one of the most trusted organizations in a given community) to maximize outreach. Schools not only are trusted by families, they also offer an effective infrastructure for parent outreach and an ongoing institutional link for students, parents and teachers that helps support digital learning on an ongoing basis.

In CFY's experience, however, schools will typically only participate in outreach for a broadband adoption program if that program is serving the whole school (or an entire grade of students) – not just a portion of the students. We therefore urge the FCC to explore the option of using a whole school model for determining eligibility for its broadband adoption program. Instead of only determining eligibility family-by-family, eligibility could also be determined by school – for example, all families with students attending a school that has at least 75% free/reduced lunch would qualify. By determining eligibility at the school level rather than the individual level, a broadband adoption program can:

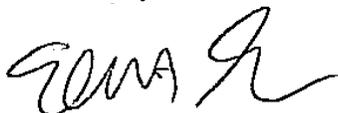
1. Leverage the school's existing infrastructure and relationships to do effective parent outreach (the school is unlikely to participate otherwise)
2. Avoid the costly and time intensive use of third party verifiers

Finally, Mr. Levin appropriately calls for a new investment that “adjusts its expenditures through the Universal Service fund” in ways that will more directly support both new and proven initiatives. In particular, he suggests undertaking a competitive awards process, akin to the “Race to the Top” or “i3” programs, which would encourage different paths to innovative solutions.

The i3 program, for example, invites solutions that take proven models to scale while also encouraging new approaches that show promise. Criteria for such an awards process can be established, in part, by examining the results of the full range of broadband adoption initiatives currently underway.

In sum, the FCC can take a more direct path to reaching its ultimate goal of increasing broadband adoption rates to maintain global competitiveness by ensuring that broadband adoption programs support training to demonstrate relevance, and efficient outreach strategies such as those used in whole school models.

Sincerely,



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