

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45
	)	
Advancing Broadband Availability Through Digital Literacy Training	)	WC Docket No. 12-23
	)	

**Reply Comments of the American Library Association in Advancing Broadband  
Availability for Low-Income Americans through Digital Literacy Training**

The American Library Association (ALA), the oldest and largest professional library association with approximately 60,000 members, submits these reply comments on the Federal Communications Commission’s Further Notice of Proposed Rulemaking (FNPRM) to bring attention to two main issues that merit further discussion. First, ALA urges the Commission to take action to bring the proposed digital literacy program to fruition through savings realized from Lifeline reform and administered through the Lifeline program.<sup>1</sup> Doing so will ensure that the populations most at risk as it relates to broadband adoption and successful use do not necessarily fall further behind. Second, ALA believes it is not possible to overstate the importance of targeting funds for training – whether formal or a combination of formal and informal – to low-income communities, as these often include the most vulnerable segments of our nation.

**Increasing broadband availability must work in tandem with digital literacy training**

Among the stated goals of the National Broadband Plan (NBP) was to ensure that “[E]very American should have affordable access to robust broadband service, and the means and skills to

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<sup>1</sup> See past ALA comments re: legal authority: <http://apps.fcc.gov/ecfs/document/view?id=7021906322>.

subscribe if they so choose.”<sup>2</sup> ALA wholeheartedly concurs. As has been made abundantly clear by numerous commenters and the Commission itself, without the skills or the desire and understanding necessary to build 21<sup>st</sup> century skills, there will be people unable to move forward in the online job market; unable to secure online educational opportunities; unable to receive government benefits; and unable to participate fully in civic life. This is a national crisis, but one that is not new – merely exacerbated by the speed at which technology changes and influences basic daily life.

As more basic and critical services migrate online (and often online only) without sufficient resources and training to support their usage, there is a growing inequity that disproportionately affects low-income persons – including many older adults, people living with disabilities, and communities of color – preventing this population from reaching its full potential. In the current proceeding, the Commission has before it the opportunity to change the trend and implement sustainable, long-term solutions to the problem.

Access to the physical infrastructure – affordable, robust broadband, hardware, and software – is one necessary piece. Access to relevant content is another. Fundamentally, both will sit idle without a digitally literate population. As an example, the recent library public computing center projects funded through the BTOP program, across the board include digital literacy training – many include specific, targeted training such as workforce development.<sup>3</sup> Project managers often stated that solely providing the physical space and infrastructure did not advance the underlying purposes of the increased public computing capacity.

ALA believes that the Commission’s investment in advancing access to the infrastructure is critical and applauds current initiatives to address availability and affordability. To ensure these are successful investments, ALA encourages the Commission to roll out a digital literacy component utilizing savings *realized* from Lifeline program reform. Data about barriers to adoption previously cited, as well as front-line library experience with community demand for digital literacy, make clear we are at a critical juncture in systematically addressing the need.

### **Supporting broadband adoption in low-income communities**

Libraries traditionally provide equitable access to information, a role that has increased as more and more resources migrate online. In conjunction with providing physical access, libraries focus on guiding people to the most relevant resources to meet their needs and provide support to those individuals who may need additional help making use of such resources.<sup>4</sup>

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<sup>2</sup> See the National Broadband Plan, Chapter 2, Goal No. 3. Available <http://www.broadband.gov/plan/2-goals-for-a-high-performance-america/>.

<sup>3</sup> See for example, Broadbandexpress@yourlibrary. Available, <http://www.nysl.nysed.gov/libdev/nybbexpress/>. See also, Maine Public Library Information Commons. Available <http://www.maine.gov/msl/commons/>.

<sup>4</sup> ALA takes this opportunity to reiterate the argument that the Commission should allow eligible applicants in this proposed new program to design a suite of digital literacy support such that specific community needs and issues

Assuming that the funding for the proposed digital literacy program comes from savings within the Lifeline program,<sup>5</sup> ALA continues to support that these funds be used to improve the ability of low-income persons to take full advantage of broadband and online resources. Home broadband adoption across the country hovers at 65 percent of households having broadband “but among households with incomes below \$25,000 the percentages are flipped: 65 percent lack broadband connections.”<sup>6</sup> These numbers also are stark among the disabled community where only 41 percent of adults living with a disability have broadband at home.<sup>7</sup> People living with a disability are almost two times as likely to live in a household with an annual income of less than \$30,000.<sup>8</sup> Among those over 65 years old, about 18 percent live in poverty.<sup>9</sup> On tribal lands where the poverty rate is about 28 percent (compared to 15 percent nationally)<sup>10</sup> broadband adoption is hardly on the scale on which the rest of the country is measured with estimates being as low as 10 percent.<sup>11</sup>

The low-income community – including these sub-groups – is at significant risk in falling further behind in the knowledge-based economy should there not be a particular focus on removing the barriers to broadband access and adoption it faces. The Commission can tackle that challenge through the current proceeding with the Lifeline pilot projects, in conjunction with the digital literacy initiative.

Libraries are well situated to provide direct assistance to these most vulnerable populations in digital literacy training. Income is a major driver for uses of public library Internet access and seeking technology help and training from library staff. People earning between 100 and 200 percent of the poverty guidelines, or about \$22,000 to \$44,000 for a family of four, had higher odds of using library computers or wireless connections by a factor of 2.68 than people earning more than 300 percent of the poverty guidelines. This is consistent with the lower availability of alternative means for Internet access also reported by lower income earners. Libraries also make a valuable community partner in helping close the broadband adoption gap among low-income

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can be effectively addressed. Programs with a tangible and immediately relevant outcome often prove the most successful; the investment of often precious time and resources on the part of the individual seeking help results in a completed government form or uploaded résumé, for instance.

<sup>5</sup> As previously stated, ALA strongly opposes funding digital literacy training or other related activities through the E-rate program. See <http://apps.fcc.gov/ecfs/document/view?id=7021906322>.

<sup>6</sup> See Dailey, et al., *Broadband Adoption in Low-income Communities*. In addition to income, the report discusses the effects of unemployment and age on home broadband adoption. Available [http://webarchive.ssrc.org/pdfs/Broadband\\_Adoption\\_v1.1.pdf](http://webarchive.ssrc.org/pdfs/Broadband_Adoption_v1.1.pdf).

<sup>7</sup> See *Americans living with disability and their technology profile*. Available [http://pewinternet.org/~media/Files/Reports/2011/PIP\\_Disability.pdf](http://pewinternet.org/~media/Files/Reports/2011/PIP_Disability.pdf).

<sup>8</sup> Ibid.

<sup>9</sup> See *The Research Supplemental Poverty Measure: 2010*. Available [http://www.census.gov/hhes/povmeas/methodology/supplemental/research/Short\\_ResearchSPM2010.pdf](http://www.census.gov/hhes/povmeas/methodology/supplemental/research/Short_ResearchSPM2010.pdf).

<sup>10</sup> See United States Census Bureau American Indian and Alaska Native Heritage Month: November 2011. Available [http://www.census.gov/newsroom/releases/archives/facts\\_for\\_features\\_special\\_editions/cb11-ff22.html](http://www.census.gov/newsroom/releases/archives/facts_for_features_special_editions/cb11-ff22.html).

<sup>11</sup> In the Matter of Improving Communications Services for Native Nations, CG Docket No. 11-41, para 1. Available [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/FCC-11-30A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-11-30A1.pdf).

communities. Finally, they already are providing basic literacy training programs that address the often additional hurdle that many may need to cross before beginning digital literacy training.

ALA encourages the Commission to bolster the Lifeline program as it considers the most effective means to spur broadband adoption by including digital literacy training. Doing so will ensure that low-income participants who also need to develop digital literacy skills have access to robust and relevant training and support options.

Respectfully submitted,

A handwritten signature in cursive script that reads "Emily Sheketoff".

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