

## Summary

Our Partnership in Philadelphia supports the Commission's desire to use savings from the Lifeline Program/Universal Services Fund to support programs and services to improve digital literacy and broadband adoption among Americans who have faced barriers to benefitting from technology. The collective Partnership's expertise is in the area of digital inclusion - delivering public access computing, providing digital literacy training and evaluation, program management, and in supporting the partnerships, staff training, and dissemination of best practices necessary for successful programs. Through our combined efforts, we see evidence that support for public access computing, digital literacy services, and low-cost broadband for low-income residents increases meaningful adoption of broadband technology and enables economic participation, improved public safety and health, pursuit of educational opportunities, and civic engagement. The communications and economic strengths of the networks also grow exponentially as new broadband users are added.

## Key Positions

Our comments focus on these positions:

1. Community based non-profit and local governments service providers should be eligible organizations in addition to schools and libraries.
2. Existing digital literacy training providers and communities, including those receiving BTOP funds, should be encouraged, and not barred from participating in the proposed digital literacy program.
3. Identification of specific needs and responsive digital literacy programs is best done at community level and the FCC should support this approach as much as possible.
4. We strongly encourage the FCC to partner with the current NTIA BTOP program staff and assets in planning and implementing the pilot and digital literacy programs. This will best leverage existing expertise within the federal government and learning resources already developed.
5. We support the FCC funding digital literacy and encourage the commission to consider other sustainable strategies, funding sources and incentives for industry partnerships to enable broadband adoption and digital inclusion that do not reduce funding for existing voice and broadband programs.
6. The proposed funding of \$10,500 per site is valuable, but will have limited impact and does not recognize all the costs necessary to provide services.
7. Funds should be set aside for overall program evaluation, technical assistance, sustainability planning. Each grantee should be required to include and fund evaluation activities.
8. Community match requirements should be low (up to 25%) and allow in-kind contributions. Providers and educators already face significant hurdles in sustaining digital literacy and community service programs. This may be particularly true for rural areas, tribes and smaller organizations.
9. The FCC should support sharing of best practices and training in delivery of digital literacy. This should be accomplished through the following activities in the grant program and by the FCC, in partnership with other federal agencies:

- a) Support training of trainers
  - b) Support sustainability of DigitalLiteracy.gov in conjunction with regional best practice portals like phillykeyspots.org, CommunitiesConnect.org, CTNBayArea.org, and PBWiki
  - c) Support a national digital literacy and public computing center mapping project, fed by state and local data collection. (See broadbandmap.gov)
  - d) Implement the Digital Literacy Corps called for in the National Broadband Plan. Work with AmeriCorps to identify national and state opportunities to foster digital corps members.
10. We support the American Libraries Association position that money should not be taken away from E-rate for this effort.
11. The broadband pilot should involve more than one tribal land.
12. In the pilot, new digital literacy providers should also be strongly encouraged to partner with existing digital literacy providers who would bring expertise to the projects.

The FCC should build on what has been begun by the Broadband Technology Opportunity Program (BTOP) currently underway and administered by the National Telecommunications and Information Administration (NTIA). The two years of BTOP was a very limited time, and the FCC would do well to leverage the infrastructure and expertise that has already been put into place through this program.