Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of:	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Lifeline and Link Up	)	WT 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 BY THE CITY AND COUNTY OF SAN FRANCISCO

INTRODUCTION

The City and County of San Francisco ("San Francisco" or "City") strongly supports the proposal of the Federal Communication Commission ("Commission" or "FCC") to initiate a low-income broadband pilot program, as set forth in the Report and Order and Further Notice of Proposed Rulemaking FCC 12-11 ("ROFNPR").[1] San Francisco also agrees with the Commission's decision to draw on the experiences of Broadband Technology Opportunity Program ("BTOP") and other programs seeking to expand broadband adoption.[2] However, we believe that the Commission could best achieve its broadband goals by relying on programs with proven experience and established resources, rather than by excluding the very organizations with the greatest experience and resources to help the Commission reach those goals.

[1] ROFNPR¶ 321.
[2]

an entirely new program to take all the necessary steps, find and equip training facilities, hire trainers, train trainers, develop curriculum, translate curriculum for non-English speakers and conduct outreach in order to meet the Commission's goals..

The Commission should fund school programs that serve the public. Eight of San Francisco's BTOP grant sub-recipients are Beacon Centers, school based community centers that serve school based children and the general public. The Beacon Centers are a collaboration between the San Francisco Unified School District ("SFUSD") and the City's Department of Children, Youth and Their Families. The Beacon Centers are operated by community based organizations with strong ties to the community that have been selected through a competitive process. They serve as a bridge between the schools and their communities by providing after school programs to SFUSD student and offering digital literacy and digital media training to adults in the communities they serve. Some Beacon Centers are not confined to schools, so can operate during the school day as well as after school. For example, the North Beach/Chinatown Beacon Center offers training to developmentally disabled adults in a non-school based facility.

Some Beacon Centers are located in San Francisco's neighborhoods with the lowest broadband subscribership and lowest incomes: Bayview/Hunter's Point, Visitacion Valley and Chinatown. While some of the centers had technology programs prior to the BTOP grant, most did not. The infusion of BTOP funding allowed the Beacon Centers to equip labs and hire trainers. By precluding these entities from participating in the program, the Commission would be effectively cutting off some of the organizations best equipped to help the Commission succeed in achieving its goals. In addition, existing programs like the Beacon Centers could be expanded within the

individual eligibility process.

San Francisco does not believe that census tracks to determine need would artificially skew the results, as urban census tracks, being densely populated in a small area, do not reflect the actuality of large pockets of poverty which are mediated in the track by more well to do populations sprinkled throughout. In fact there is a huge digital divide in the urban setting, which may be more pernicious as it leads to the digitally illiterate being left out of society in many ways that does not happen in the more consistent rural culture.

3. THE COMMISSION SHOULD PROVIDE SUFFICIENT, FLEXIBLE FUNDING FOR DIGITAL LITERACY PROGRAMS

San Francisco agrees with ALA's contention that $15,000 per year per entity may not be adequate for a sound digital literacy program and that funding amounts should be somewhat flexible to account for differences in costs between regions and the scope of proposed training. The ALA estimates that the real costs of a "complete, rigorous and sustainable" digital literacy program are approximately $45,000 per year.[5] For San Francisco's own BTOP funded digital inclusion program, its Beacon Center sub-recipients pay an average of $52,000 per year in salary and fringe benefits for a full time technology coordinator. This represents just the labor costs, not the technology, connectivity, facilities and other costs.

[5] ALA Comments, p. 11