

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the matter of)
)
Advanced Broadband Availability Through) WC Docket No. 12-23
Digital Literacy Training)
)

To: The Federal Communications Commission

COMMENTS OF THE INTERNET KEEP SAFE COALITION (iKEEPSAFE®)

I. INTRODUCTION

The Internet Keep Safe Coalition (iKeepSafe®) submits these comment replies in response to the Commission’s Further notice of Proposed Rulemaking (“FNPRM”) regarding “the use of universal service funding to address the barrier that lack of digital literacy creates to increased broadband adoption among low-income Americans. . .[Also] on using universal service support for targeted, time-limited funding to ensure that low-income Americans who have not adopted broadband have the digital literacy skills they need to access and use broadband, [and] the effectiveness of formal digital literacy training classes, and the benefits such training provides as compared to informal digital literacy guidance that may be provided by librarians and others to consumers who have not adopted broadband.”¹

As a fundamental premise for accomplishing increased digital literacy and broadband adoption, iKeepSafe recommends that the Commission follow an established public health model for initiating change in populations: new skills and habits are best retained when the message comes from someone they know and trust, ideally a peer, and the message is positive and optimistic.

¹ *Advancing Broadband Availability Through digital literacy Training*, et al., WC Docket No. 12-23 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, ¶¶ 416 – 421, 426–428 (rel. Feb. 6, 2012) (“Digital Literacy Training Order”).

II. IKEEPSAFE SUPPORTS DIGITAL LITERACY AND CITIZENSHIP TRAINING AS THE BEST OPPORTUNITY FOR AFFECTING INCREASED BROADBAND ADOPTION AMONG LOW-INCOME AMERICANS.

Obstacles to Adoption: FCC research identifies three main reasons why people do not have broadband at home: ²

- 41% of non-adopters cite lack of digital literacy or lack of relevance in their lives as the main reason they don't have internet. They don't understand how or why broadband benefits them.
- 15% cite the cost of the broadband service as the inhibitor
- 10% cite the cost of the computer.

Digital literacy helps citizens understand the benefits of broadband, even for those who have never been online. Users cannot visualize how the technology will enhance their lives until they have competency in using it. Without this vision, offers for reduced-rate broadband will fail due to perceived lack of relevance.

Strong digital literacy training will take participants beyond the basics of merely plugging into broadband to genuine connectedness by helping them understand why broadband will improve their lives. The most successful programs must address why and how broadband will help them to live, learn, work, earn, and play:

- Live: Using online tools to promote personal wellness.
- Learn: Using online tools to become tech savvy and self directed learners
- Work: Using online tools to protect and manage personal spending and savings
- Earn: Using online tools to become college and career ready in the 21st century
- Play: Using online tools to find cultural and recreational opportunities near schools and across the city³

III. CASE STUDY: “TECH GOES HOME” FOR LOW INCOME RESIDENTS OF BOSTON. WHERE UNIVERSAL SERVICE FUNDS WILL HAVE A SIGNIFICANT IMPACT.

² Horrigan, John B., The FCC's National Broadband Plan Consumer survey, Broadband Adoption and Use in America, OBI Working Paper series 1, February 2010, http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-296442A1.pdf

³ *TechGoesHome.org*, “Curriculum.” <http://www.techgoeshome.org/curriculum>.

iKeepSafe submits the following case study as a model for a successful pilot for expanding broadband adoption through digital literacy and recommend this kind of digital literacy education as a primary recipient for Universal Service Funds. “Tech Goes Home” (TGH) is a BTOP grantee that serves low income residents of inner city Boston (with new pilots in New York). It is similar in some respects to Connect Ohio program mentioned in the Commission’s Digital Literacy Training Order.⁴

TGH provides a laptop, reduced rates for broadband access, and 15 hours of required digital literacy training with a teacher at their child’s school. In 226 classes, TGH served 5,153 individuals in 3016 households; 45 percent had no computer in the home, and 37 percent did not have Internet access. By the end of the training, every family has a computer in the home, and 95% report that they will register for broadband access. Six months later, 90 percent had adopted broadband, and 41 percent reported that the TGH program made it easier to find work, or it improved job prospects at current job.

TGH also promotes an unusually symbiotic educational relationship between the parents, students, and educators at the neighborhood school. Seventy-one percent (71%) of participants had never set foot in their child’s school before taking the training classes; six months after the training, 58 percent reported that they stayed in communication with their teacher (or community trainer),” and 40 percent have participated in further activities with their child in school.

The positive impact of this model not only for broadband adoption in the parents and the next generation, but also for improved parental involvement in the child’s education cannot be overstated. Having the opportunity to own a computer and be connected to broadband is a catalyst for parent involvement in school and continued interaction with teachers at the school after the required training ends.

The TGH program offers these residents the ability to improve their quality of life as new members of the online community. It’s also available to non-student families. Low-income citizens who live near the schools and community centers where the program is implemented are eligible to participate. TGH provides opportunities for all residents to connect to schools,

⁴ See paras. 426-27.

community programs and assets, government agencies, and each other. TGH was named Laureate in the 2011 ComputerWorld Honors Program⁵ and an award of Technology Achievement from the Public Technology Institute.⁶

This approach also follows the early model developed by Dr. Davina Pruitt-Mentle for using on-site training in digital literacy to expand broadband adoption in immigrant populations (Davina Pruitt-Mentle, personal communication, October 2005).

IV. IKEEPSAFE ENCOURAGES INTER-AGENCY COOPERATION AMONG FEDERAL AGENCIES ALREADY ENGAGED IN DIGITAL LITERACY FOR BROADEST REACH AND DEEPEST PENETRATION.

Over the last seven years, iKeepSafe has partnered with many federal agencies in efforts to improve digital literacy, particularly for safety and security for youth. Government agencies already engaged in promoting cyber safety, security, and literacy/citizenship will benefit by taking a multi-disciplinary approach in leadership and action that reaches out to all the community efforts underway (local and federal). In addition, many states have programs that dovetail with federal programs.

As it is, the different agencies work independently in silos. iKeepSafe encourages all agencies engaged in promoting digital literacy and citizenship—including safety, security, and ethics in the online community—to cooperate with each other, share information, and seek to understand different but related aspects of digital literacy and citizenship.

For example, the Department of Education (DOE) funds studies to measure digital and media literacy and has a technology plan to prepare all students to succeed in the twenty-first century digital environment. Homeland Security promotes an education track for preparing students to enter cyber security professions; it also promotes a broad culture of educating for cyber safety, security, and ethics through the National Cyber Security Alliance.

The Department of Justice (DOJ) funds and promotes extensive research in online safety and risk prevention by the Crimes Against Children Research Center. Health and Human

⁵ "Honors Program 2011." *CWhonors.org*. Computerworld.com, 1 May 2011. Web. 01 May 2012. <<http://www.eiseverywhere.com/ehome/CWHONORS2011/35791/>>.

⁶ City of Boston, Massachusetts. Office of the Mayor. *City of Boston Receives Awards for Technology Achievement from the Renowned Public Technology Institute*. City of Boston. City of Boston, 23 Mar. 2011. Web. <<http://www.cityofboston.gov/news/Default.aspx?id=5031>>.

Services brings public health experts into this dialogue with bully prevention studies and health risk management for at-risk behaviors. The Federal Trade Commission (FTC) is active in online fraud prevention, privacy and consumer education through its OnGuardOnline.gov program. All of these topics come together in digital literacy. If we want to “play where the puck is going to be,” (continuing with Commissioner McDowell’s Gretzky metaphor), digital literacy training for broadband adoption would include all of these aspects for the most robust system yet!

V. CONCLUSION: GOALS

We know from experience, that literacy is not accomplished in a three-hour seminar or online. Where relevancy and literacy skills are the primary obstacles, we cannot assume that online solutions will reach the people who need it the most.

We are convinced that the best hope for reaching low-income Americans and instigating lasting broadband adoption with genuine literacy is through offering small community grants that are connected to local organizations where these families already circulate. Local community programs (in schools, after school programs, Boys and Girls Clubs, YMCA/YWCA, continuing education programs, etc.) that include twelve to fifteen hours of tutoring with a mentor who is personally connected in some way will yield the biggest bang for the USF buck.

Respectfully submitted,

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