To the Broadband Opportunity Council,

Attached are comments from EveryoneOn in response to the Request for Comment put out by the Broadband Opportunity Council. Please let us know if you have any issues with the file or further questions on our comments.

Thank you!

Best,
Suchita

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Comments to the Broadband Opportunity Council

EveryoneOn is a national nonprofit working to eliminate the digital divide by making high-speed, low-cost Internet service and computers as well as free digital literacy training accessible to all unconnected Americans. We aim to leverage the democratizing power of the Internet to provide opportunity to all Americans—regardless of age, race, geography, income, or education level.

In our years working with community-based organizations, national nonprofits, schools, and more on Internet adoption work, we have collected best practices on adoption as well as suggestions on how to make adoption easier and more effective.

BEST PRACTICES

Currently, digital inclusion work is primarily conducted on a local level, and there are strong benefits to this approach. Every community has different needs and community-based organizations are best placed to understand these needs and create solutions to directly address them. However, because of this localized approach, communities do not always share practices which each other, which means that new digital inclusion organizations are often required to recreate work that has already been done.

It is integral that we create support systems for community-based organizations such that digital inclusion organizations across the country have a platform on which to communicate with each other, provide resources, and share best practices.

CROSS-SECTOR COORDINATION

Infrastructure for Internet service is still a problem in the United States, especially in rural areas. According to the National Broadband Map, three percent of the population has access to zero wireline service providers. This distinction is starker when looking at urban versus rural populations. According to a study by the NTIA, 71 percent of the rural population in 2011 had access to a basic wireline broadband service as compared to 98 percent of the urban population.

We need to improve infrastructure, especially in rural areas. However, building out infrastructure is expensive. To help with this problem, we should coordinate construction efforts across sectors to help reduce total cost.

CROSS-SECTOR PARTNERSHIPS

Home Internet access has been proven to improve outcomes in the economic, health, education, and other sectors. Ensuring that Americans have access to affordable Internet is not only beneficial to the unconnected household but also to the many sectors these households interact with on a daily basis.

By working with partners such as banks, utility companies, and hospitals, we can incentivize companies to fund or promote Internet adoption, as it is economically beneficial to them as well. More households online mean more customers for many companies, and therefore there is reason for them to invest.

DEVICES

Internet access important, but won't be adequately used without a device. Mobile phones aren't enough, especially for school and work purposes. For those, you really need a laptop or desktop computer.

According to a report by Pew Research Center, 10 percent of Americans own a smartphone without any other form of high-speed Internet at home. Fifteen percent only have limited options aside from their data plans.

Without access to affordable devices, Internet service won't be adequately utilized. Studies have often found that people don't use large amounts of data, but what isn't discussed is the correlation between using very little data and not having a computer. In fact, we have found that, on average, households use 44 GB of data per month. That is, when households have a connection, they are very active on the Internet, but need the means to do so.

As an example of an Internet and device solution, we are currently working with Cox Communications, Computer Dealers Inc., and local partners in Macon, GA to engage low-income families with young children. Through a grant from the Cox Foundation and by working with our partners, we have managed to heavily subsidize tablets preloaded with learning content for these families and paired it with affordable Internet access. The combined solution, we believe, will be more effective in helping these families take advantage of the power of technology than simply offering low-cost Internet service.

To truly engage low-income communities online, we need to ensure that we are working with device refurbishers and come up with creative solutions to ensure these households have devices as well.

EXPAND E-RATE

The digital divide, while harmful to society as a whole, is particularly harmful to K-12 students. Internet access is becoming increasingly integral to completing homework and succeeding in school. Lack of home access has created what FCC Commissioner Jessica Rosenworcel has termed the "Homework Gap." A recent study by the Pew Research Center found that households with annual incomes below $50,000 are four times as likely as higher-income households to lack broadband.

While e-rate reform in 2014 helped direct funding toward school's Internet initiatives, it is still limited to the physical school buildings. As school move from computer labs to 1:1 learning, they need to ensure that their students are connected not only while at school, but also at home.

It is no longer appropriate to define a school by the physical building in which classrooms are housed. In this digital age, learning extends beyond those walls and into students' homes. Therefore, by allowing e-rate funding to help provide Internet access to schools, that funding should be applicable not only to infrastructure in the

buildings themselves, but also to service in students' homes when there otherwise is none.

MEASUREMENT & EVALUATION

Despite increased conversation around digital inclusion and broadband adoption, the data with which we are working is severely limited and quickly growing out-of-date. As we move forward with Internet adoption work, it is integral that we collect data along the way to inform and improve our work. Currently those in the digital adoption space rely on a handful of studies, many of which are not current, to inform the work they do.

The government should ensure surveys and data collection focus on barriers to adoption, data usage, device usage, churn rate, and more. It is also important to collect and utilize data on how customers and churn rates react to different trends, such as date of payment, cost of service, and cost of device.

It would also be useful to understand how households utilize and purchase different types of plans. It would be good to know the amount of data used on different types of plans, likelihood to remain on them, and more. It would also be interesting and helpful to have more data on how eligibility requirements affect customers, how many customers make it through various eligibility requirements, and what sorts of barriers they impose.

SPECTRUM

In the National Broadband Plan, the FCC offers a range of suggestions on how we can more efficiently use spectrum. One recommendation for policy we believe ought to be followed through with is incentivizing the use of spectrum in socially beneficial ways. That is, we could consider auctioning bands of spectrum with the express purpose of using it for affordable Internet access or incentivizing Internet service providers in other ways to provide affordable offers.

The Broadband Opportunity Council offers a unique opportunity to collaborate efforts across departments in the federal government. It gives us the chance to look closely at the work that is already being done to combat the digital divide, ensure that it is not redundant, and identify ways to not only improve upon solutions that are already underway, but also to collaborate to create new ones.

Working on the digital divide, we have come to truly appreciate how access to the Internet really does mean access to opportunity. We look forward to what the Broadband Opportunity Council can do to make these opportunities a reality for the millions of Americans currently without home Internet service.