

From: [Dempsey, Jameson](#)
To: [BOCrfc2015](#); [Karen Hanson](#); "[Denise.Scott1@wdc.usda.gov](#)"
Cc: [Heitmann, John](#); [Guyan, Joshua](#)
Subject: Broadband Opportunity Council - Lifeline Connects Comments
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To The Broadband Opportunity Council:

Please find attached the comments of the Lifeline Connects Coalition on the Broadband Opportunity Council's Request for Comment (Docket No. 1540414365-5365-01, RIN 0660-XC019).

Should you have any questions please feel free to contact us.

Sincerely,
Jameson

KELLEY

DRYE

Jameson J. Dempsey

Washington Harbour, Suite 400
3050 K Street NW, Washington, DC 20007
o: (202) 342-8602 | m: (917) 858-6006
jdempsey@kelleydrye.com

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**Before the
RURAL UTILITIES SERVICE
DEPARTMENT OF AGRICULTURE
and
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
DEPARTMENT OF COMMERCE**

In the Matter of)	
)	
Broadband Opportunity Council)	Docket No. 1540414365-5365-01
Notice and Request for Comment)	
)	RIN 0660-XC019

The Lifeline Connects Coalition (the Coalition),¹ by and through its attorneys, submits these comments in response to the Rural Utilities Service (RUS) and the National Telecommunications and Information Administration (NTIA) Broadband Opportunity Council (BOC) Notice and Request for Comment (Request for Comment) on “actions the federal government can take to promote broadband deployment, adoption, and competition, including by identifying and removing regulatory barriers unduly impeding investments in broadband technology” in furtherance of the March 23, 2015 Presidential Memorandum on the same subject.²

¹ Lifeline Connects is a coalition of primarily wireless telecommunications service providers that believe that all Americans deserve access to affordable telephone and broadband service. Its members are Blue Jay Wireless, LLC, Global Connection Inc. of America, i-wireless, LLC and Telrite Corporation. Lifeline Connects is committed to educating and separating myths from facts about the Lifeline program, sharing best practices on compliance and industry self-regulation, and proposing additional reforms to preserve the integrity of the program.

² See Broadband Opportunity Council Notice and Request for Comment, Docket No. 1540414365-5365-01, RIN 0660-XC019, 80 Fed. Reg. 23785 (Apr. 29, 2015); Office of the Press Sec’y, The White House, Memorandum for the Heads of Executive Departments and Agencies, *Expanding Broadband Deployment and Adoption by Addressing Regulatory Barriers and Encouraging Investment and Training* (Mar. 23, 2015), available at <https://www.whitehouse.gov/the-press-office/2015/03/23/presidential-memorandum-expanding-broadband-deployment-and-adoption-addr>.

The Coalition commends the many efforts that the Executive Branch has already taken to promote access to telecommunications and broadband for low-income and underserved Americans, including through the ConnectED program and the programs instituted through the American Recovery and Reinvestment Act of 2009. While the work and investments to date have been important, there is still much work needed to ensure access for all Americans. It is for this reason that we welcome the opportunity to offer a number of proposals to promote broadband availability and adoption within vulnerable communities.³

As explained in more detail below, the Coalition recommends that Executive Branch Agencies leverage existing funding sources to: (1) promote public-private partnerships to develop resources for vulnerable communities, including broadband availability and adoption playbooks, broadband adoption kits, and mobile applications; and (2) leverage federally funded broadband assets to deploy publicly available broadband hotspots within vulnerable communities.

I. The Executive Branch Agencies Should Fund Public-Private Partnerships Between Local Communities and Low-Income-Focused Providers to Promote Broadband Adoption

In the Request for Comment, the BOC asks a series of questions related to broadband adoption, particularly among vulnerable communities.⁴ The Coalition respectfully submits that

³ The Coalition uses the term “vulnerable communities” as it is used in the Request for Comment. *See* Request for Comment, Question 22 (“Vulnerable populations might include, but are not limited to, veterans, seniors, minorities, people with disabilities, at-risk youth, low-income individuals and families, and the unemployed.”).

⁴ Among other questions, the BOC asks: “How can the federal government best collaborate with stakeholders (state, local, and tribal governments, philanthropic entities, industry, trade associations, consumer organizations, etc.) to promote broadband adoption and deployment?” *Id.* at Question 5. “How can specific regulatory policies within the Executive Branch agencies be altered to remove or reduce barriers that prevent vulnerable populations from accessing and using broadband technologies?” *Id.* at Question 22. “How can the federal government make broadband technologies more available and relevant for vulnerable populations?” *Id.* at Question 23. “As the federal

the Executive Branch should use existing resources to fund three types of public-private partnerships between local communities and industry to develop and implement strategies to address the root causes that limit broadband adoption among vulnerable communities: cost, digital literacy, relevance, and accessibility.⁵

Specifically, the Coalition proposes that the Executive Branch agencies (1) fund broadband availability and adoption playbooks targeted toward closing the adoption gap among vulnerable communities; (2) establish public-private partnerships to create and distribute broadband adoption kits focused on digital literacy and the availability of broadband resources; and (3) develop or fund the development of accessible mobile applications tailored to the needs of vulnerable populations to make broadband more relevant for them. In supporting these public-private partnerships, the Executive Branch agencies should seek to leverage the expertise and experience of Lifeline program eligible telecommunications carriers (ETCs), which through their work have forged deep relationships with vulnerable communities and developed successful strategies for promoting adoption of communications services, including broadband in some areas.

A. *Fund Broadband Availability and Adoption Playbooks for Vulnerable Communities to Address Broadband Adoption Barriers*

The Coalition proposes that the Executive Branch provide funding for local communities to develop, together with key stakeholders, broadband availability and adoption playbooks to

government transitions to delivering more services online, what should government do to provide information and training to those who have not adopted broadband?” *Id.* at Question 4.

⁵ *Id.* at Question 17 (recognizing that “[t]ypical barriers to broadband adoption include cost, relevance, and training.”); Fed. Commc’n Comm’n, *Connecting America: The National Broadband Plan*, 168-69 (2010) (identifying four principal barriers to broadband adoption: the cost of broadband, digital illiteracy, lack of relevance to their needs, and inaccessibility for people with disabilities).

simultaneously address the needs of vulnerable populations and the root causes of non-adoption. Each community should have its own playbook, and each playbook should include strategies for making available no-cost-to-consumer or very-low-cost-to-consumer broadband solutions; integrating robust digital literacy training within community anchor institutions; and developing resources that increase the relevance and accessibility of broadband content and services for vulnerable populations.

The playbooks should reflect the unique needs of each community, while building upon general strategies for success. To that end, while drafting the playbooks, communities should bring together local leaders, community anchor institutions, and broadband providers that have demonstrated a unique focus on serving low-income and vulnerable communities. For example, since the inception of the Lifeline program, Coalition members and other ETCs have worked hard to build relationships with and serve vulnerable communities throughout the United States. Through this experience, these ETCs have developed significant experience in marketing and provisioning telecommunications and broadband services specifically aimed at the needs of vulnerable communities, serving on the front lines in closing the adoption gap. Indeed, in many cases, a Lifeline subscriber's first experience with the Internet is through its wireless carrier. As a result, Lifeline ETCs would serve as excellent private-sector partners in the development and implementation of the playbooks.

To ensure that communities are able to gain insights from each other in the development and implementation of the playbooks, the Executive Branch agencies should create a playbook clearinghouse that is publicly available on the Internet (e.g., through the Economic Development Administration (EDA) website).⁶ This clearinghouse should include not only the playbooks of

⁶ See National Broadband Plan at 183-84.

individual communities, but also follow-up implementation status reports so that communities can learn from each other about those strategies that were successful and those that could be improved. This clearinghouse would also serve as a place from which state and federal policymakers—or a neutral third-party—can evaluate adoption strategies and programs; understand the role and importance of free or low-cost broadband programs for vulnerable communities; and craft policies that maximize the benefit of those strategies programs.⁷

B. Establish Public-Private Partnerships to Create and Distribute Broadband Adoption Kits in Conjunction with a National Broadband Awareness Campaign

In addition to supporting the development of playbooks, the Executive Branch agencies also should support partnerships between public and private sector stakeholders to promote broadband adoption and digital literacy through broadband adoption kits—i.e., a package of materials that a community anchor institution or public benefit center can use to inform members of vulnerable communities about the importance and availability of broadband service.

The kits should include culturally sensitive brochures, potentially in multiple relevant languages, describing the benefits and relevance of broadband. For example, the brochures could explain how web-based resources can improve an individual’s access to employment resources, healthcare, government benefits, educational resources, and childcare. In addition, the kits should include easy-to-navigate how-to guides for various broadband devices—e.g., smartphones and tablets—and a glossary of key terms to promote digital literacy. Moreover, to address the broadband affordability gap, the kits should provide information on programs, such as Lifeline, through which individuals may be eligible to receive free or very-low-cost service. This information should include eligibility requirements, ETCs in the state, and plan options.

⁷ See *id.* at 183.

To ensure the maximum impact of the broadband adoption kits, they should be deployed in conjunction with a national broadband awareness campaign.⁸ During this awareness campaign, local communities and broadband providers could partner to host digital literacy and adoption events in community anchor institutions, public housing complexes, or other places that are frequented by vulnerable populations. At these events, individuals could distribute materials from the kits and provide incentives for non-adopters to sign up for broadband service (e.g., discounted or free broadband-enabled equipment). Moreover, the events could include special hands-on training sessions during which individuals—particularly the elderly and disabled communities—could gain computer and smartphone skills, and learn about available assistive technologies.

Following the national awareness campaign, broadband adoption kit materials should be made available in community anchor institutions, public housing complexes, and through other locations serving vulnerable communities (e.g., food pantries, churches, etc.). These locations should provide training to staff so that they can answer questions that individuals may have about the value of broadband, how to use various broadband-enabled technologies, and programs available to address the root causes of non-adoption. In this way, members of vulnerable communities will have easy access to important resources about broadband and access, and dedicated staff persons to answer their questions.

⁸ This national broadband awareness campaign is consistent with Recommendation 9.7 of the National Broadband Plan. *See id.* at 180-81. While the Coalition appreciates the work of public-private partnerships such as Connect2Compete to promote broadband adoption, we submit that the national awareness campaign proposed herein should include a focus on wireless broadband services and devices, since vulnerable communities, such as low-income Americans and minorities, are more likely to turn to and heavily rely on smartphones for online access (e.g., for access to employment resources). *See* Pew Research Center, *U.S. Smartphone Use in 2015*, 3 (2015), available at http://www.pewinternet.org/files/2015/03/PI_Smartphones_0401151.pdf.

C. *Develop Mobile Applications Tailored to Vulnerable Populations to Make Broadband More Relevant for Them and to Better Connect Them to Public Assistance and Vital Information*

One of the key challenges that broadband adoption projects face is demonstrating the relevance of broadband to non-adopters, particularly the elderly. To close the relevance gap, the Executive Branch agencies should build or fund the development of culturally relevant, mobile-friendly apps designed for vulnerable communities. These apps could include: (1) a mobile digital literacy portal with tools and lessons for new adopters to understand the benefits of the Internet (consistent with materials in the broadband adoption kits)⁹; (2) program- or agency-specific apps that allow members of vulnerable communities—particularly low-income individuals—access to their benefit information, contact local agency points of contact, or schedule appointments; (3) job training, CV-development, and other federal, state, or local employment resources; or (4) information about nearby free Wi-Fi hotspots.

There are a number of possible avenues for developing these applications to close the relevance gap. First, the General Services Administration’s 18F division or the White House’s U.S. Digital Service could develop mobile applications in-house that are focused on important federal programs targeting vulnerable communities.¹⁰ Second, the Executive Branch could develop grant programs within the EDA to fund non-profits and state and local public sector efforts to develop mobile applications relevant to the needs of vulnerable communities. Third, the Executive Branch could establish public-private partnerships with broadband providers

⁹ This portal could build on, improve, and update the resources available at www.digitalliteracy.gov, which NTIA launched in 2011.

¹⁰ The White House, *The Story of the U.S. Digital Service*, <https://www.whitehouse.gov/digital/united-states-digital-service/story> (last visited June 10, 2015); 18F, <https://18f.gsa.gov/> (last visited June 10, 2015).

focused on vulnerable communities (e.g., ETCs) to develop mobile applications tailored to those communities and to offer those applications.

Regardless of how the Executive Branch develops (or supports the development of) these mobile applications, the net effect will be to increase the relevance of broadband and broadband-enabled services for vulnerable communities, boosting adoption and bringing more Americans into the digital economy.

II. The Executive Branch Agencies Should Leverage Federally Funded Broadband Infrastructure to Promote Free Wi-Fi Broadband Access Within Vulnerable Communities

In the Request for Comment, the BOC asks: “How can the federal government best promote the coordination and use of federally-funded broadband assets.”¹¹ In short, the Coalition proposes that the Executive Branch modernize its regulations and policies to create incentives for federally funded last-mile broadband infrastructure projects to make available free, public Wi-Fi hotspots to end users in community anchor institutions and public accommodations.

For example, the EDA could encourage recipients of Planning Program grants to include free, public Wi-Fi as a part of any regional economic development plan. In addition, the EDA could incentivize recipients of Economic Development Assistance Program grants to include a free, public Wi-Fi component to the extent those programs support broadband in community anchor institutions and public accommodations. Similarly, the Department of Housing and Urban Development could incentivize any broadband projects funded through the Choice Neighborhood Implementation Grants program to include a free, public Wi-Fi option in public spaces such as entryways and outdoor spaces. Moreover, RUS could incentivize recipients of grants provided through its Community Connect Broadband Grants program to include a free,

¹¹ Request for Comment, Question 2.

public Wi-Fi component that extends both to the covered community center as well as to any public accommodations that receive broadband as a result of the grant.

By encouraging the deployment of free, public Wi-Fi access, the Executive Branch agencies will help to overcome the affordability gap for low-income individuals who are unable to adopt broadband for cost-related reasons—or supplement solutions like the Lifeline program, which is poised to transition to supporting broadband service—and ensure that vulnerable populations are not left behind in the mobile revolution.

III. CONCLUSION

In these comments, the Coalition provides several recommendations that would have a significant and positive effect on closing the adoption gap that threatens to leave so many vulnerable Americans behind. We appreciate the opportunity to share our experience and insight and are ready to assist the BOC as its work progresses.

Respectfully submitted,



John J. Heitmann
Joshua Guyan
Jameson J. Dempsey
Kelley Drye & Warren LLP
3050 K Street, NW
Suite 400
Washington, DC 20007
(202) 342-8400

Counsel for the Lifeline Connects Coalition

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