



Submitted via Electronic Comment Filing System

January 25, 2021

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
45 L St. NE
Washington, DC 20554

Re: Emergency Broadband Benefit Program [Docket No. 20-445]

Dear Ms. Dortch,

Thank you for the opportunity providing comments to the Federal Communications Commission (FCC) on the Emergency Broadband Benefit Program (EBBP) established by the Consolidated Appropriations Act of 2021. NeighborWorks America strongly supports the newly created Emergency Broadband Connectivity Fund reimbursing service providers for providing consumers with discounted broadband services and connected devices during the coronavirus pandemic. NeighborWorks envisions this as one of the many steps taken, along the path, developing and improving broadband infrastructure of our communities and their residents during the COVID-19 crisis, and importantly, beyond. Broadband is no longer a luxury, but a critical utility service needed to participate fully in our nation's economy, culture, and society.

Please note these comments have not been submitted to or approved by NeighborWorks America's board and do not necessarily represent the views of its board members, either collectively or as individuals. These comments have been formed based on the ongoing work of NeighborWorks with our network of nearly 250 NeighborWorks-chartered local and regional nonprofits.

For over 40 years, the Neighborhood Reinvestment Corporation (doing business as NeighborWorks America), a Congressionally-chartered, national, nonpartisan nonprofit, has created opportunities for people improving their lives and strengthening their communities by providing access to homeownership and safe, affordable rental housing, increasing financial capability, and promoting community and economic development. Before the COVID-19 pandemic arrived, Internet access was already a critical utility. Now, with public health restrictions severely limiting in-person interactions, much of American life has moved online. As a result, broadband access is absolutely essential to gaining or sustaining employment, achieving secondary or post-secondary educational success, and obtaining telehealth appointments. It is key to household economic stability and will be crucial for economic recovery and resilience for people and communities across the country.

NeighborWorks offers these broad comments to the Emergency Broadband Benefit Program reinforcing the need bringing timely and equitable access and devices to all eligible households, ensuring strong communication efforts about the program, and emphasizing the need for effective collaboration with the affordable housing and community development players and providers in communities. The EBBP has the potential to help bridge the digital divide by enabling a comprehensive, country-wide broadband infrastructure akin to electric grid or systems of roads. While the estimates vary, the number of Americans without the ability to access (let alone the ability to afford) broadband Internet could be as high as 42 million, according to BroadbandNow Research. The goal of full connectivity, universal access and affordability must be achieved.

NeighborWorks America and the NeighborWorks network have focused together on broadband needs in affordable multifamily homes and in communities lacking broadband access - particularly through our network's Rural Initiative. Large swaths of rural areas, tribal areas, and areas of persistent poverty lack access to reliable high-speed Internet. In tandem with the EBBP, the FCC should ensure Broadband coverage maps are up-to-date and verified to be accurate for a majority, if not all, of the residents of a census tract. Accurate maps can help direct funds for payments of bills or additional funds for building infrastructure for real access.

Developing Robust Communication Strategies

The FCC has asked about promoting the EBBP program and raising awareness. NeighborWorks urges the Commission to encourage all Internet Service Providers (ISPs) to participate. Those participating should be required to publicize the availability of the benefit in their service areas. The FCC should require providers to work directly with their local governments and local community development nonprofits ensuring the benefit reaches as many eligible households as possible. Building upon these partnerships can and should provide opportunities expanding broadband coverage.

To meet the goals of reaching people in need of assistance, the FCC should engage in a broad public outreach campaign, including prominent web, social media, and other public service-like announcements. This campaign should focus both on the ISP participation, but also nonprofit, government, and tribal government organizations. The FCC can develop and provide model communications assisting participating ISPs informing their current or potential customers about the EBBP. Additionally, the FCC can maintain a web-listing of participating ISPs for consumers, governments or partner organizations to access.

Uptake of this program, especially among target populations, will require strategic partnerships and robust communication. To support residents of affordable housing, NeighborWorks strongly recommends the FCC develop a comprehensive public outreach campaign, including partnerships with public housing authorities, state housing finance agencies, tribal governments, community development organizations, and affordable housing providers. Because the FCC proposes requiring eligible households to directly interact with the National Verifier, applying for the Emergency

Broadband Benefit Program, transparent and easy-to-understand messaging will be necessary ensuring current Lifeline users and, especially first-time users, can navigate the National Verifier platform.

Finally, transparent and jargon-free communications and marketing materials should be created and shared with consumers describing the winddown of the program prior to its predicted conclusion, which will happen either six months after the public health emergency ends or when funds are fully expended. Again, the FCC can create model communications so ISPs could provide a two- or three-month notice of the program's termination so consumers could plan accordingly. Consumers also should not be subject to termination or other fees associated with ending account services if such termination is a result of the end of the EBBP.

Promoting the Participation of Internet Service Providers

Communication is critically important for promoting and encouraging the participation of providers of Internet services. The effectiveness and uptake of the EBBP will be dependent on the widespread participation of ISPs. Because the program is voluntary, it will be critical for the FCC lowering barriers to entry and consider other ways encouraging participation, particularly of small and local ISPs. Such ISPs, including those serving rural communities, should be automatically considered eligible to participate, as their services will be 'widely available' in the areas they serve. They also are often working with housing and community providers ensuring connectivity and access for lower-income households. The FCC can construct incentives encouraging smaller ISPs, especially those serving communities that would otherwise not be served, particularly with those that may be able to expand their service areas with the assistance of the EBBP-ensured payments. NeighborWorks supports using a system of rolling applications for ISPs allowing time for outreach and marketing, working to encourage ongoing participation.

Ensuring Adequate Broadband Speed

Because having access is but the first test, the FCC must ensure participating ISPs are providing speeds above the current 25/3 Mbps standard. If internet speeds are too slow, they will not support full functionality of activities enabling consumers to make or receive high-quality voice, data, graphics, and video telecommunications. If the speeds of service do not allow students full participation in school or workers to engage at work, the digital divide will not be bridged, and the benefit will not meet its full goal.

Lowering Barriers to Consumer Participation

The EBBP's programmatic design, along with the participating providers themselves, should ensure there are no impediments to participation for eligible households. Providers can and should work with local partners ensuring students, seniors, people with disabilities and others, like people living on tribal lands, have no barriers accessing by ensuring easy verification of eligibility. The FCC could, for

example, establish alternative verification processes that dovetail with federal, state or local housing program eligibility definitions, giving blanket eligibility to residents living in federally assisted housing such as HUD's 202/811, Section 8, and Public Housing; USDA Rural Housing programs; or Low-Income Housing Tax Credit properties. In order to ensure that all residents of a multifamily housing property are eligible, the FCC should clarify the definition of address to include 'unit' or 'apartment' so that there is not a limit on consumers at one street address who can access the benefit.

Providing Affordable Useful Devices

In addition to the monthly discount for services and associated equipment, the EBBP statute provides an additional subsidy passed through ISPs for a discount of up to \$100 for connected devices, including a laptop, desktop, or tablet. The FCC should ensure eligible devices include a webcam or video capabilities, microphones, and word-processing applications. NeighborWorks also encourages the FCC to consider additional incentives for ISPs or community partners assisting in providing options for additional subsidized devices to lower-income households with more than one potential user. The FCC should clarify the household contribution, for a connected device, is a one-time cost and incentivize the lowest possible costs of \$10 versus the maximum of \$50 where appropriate.

Closing

NeighborWorks appreciates the FCC's efforts to swiftly implement the Emergency Broadband Benefit Program and supports all efforts closing the digital divide in rural, tribal, and other parts of the country not served by affordable, accessible, and adequate broadband. We look forward to reviewing the comments filed during the public response comment period and would be happy to serve as a resource to the FCC as you develop your outreach and communications about the EBBP.

Sincerely,

A handwritten signature in black ink that reads "Marietta Rodriguez". The signature is written in a cursive, flowing style.

Marietta Rodriguez
President and CEO