

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matters of)	
)	
International Comparison and Consumer Survey Requirements in the Broadband Data Improvement Act)	GN Docket No. 09-47
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act)	GN Docket No. 09-137
)	

**REPLY COMMENTS OF THE MINORITY MEDIA AND TELECOMMUNICATIONS
COUNCIL IN RESPONSE TO – NBP PUBLIC NOTICE # 30**

The Minority Media and Telecommunications Council (“MMTC”) respectfully submits the following comments in response to the Commission’s Public Notice Seeking Reply Comments in Support of National Broadband Plan, NBP Public Notice # 30 (“Notice”).¹

As the Commission stated in the initial Notice of Inquiry, “Our goal must be for every American citizen and every American business to have access to robust broadband services.”² Responding to this inquiry, MMTC noted that the Commission must pay special attention to vulnerable minority communities and minority businesses when developing the plan because “racial and ethnic minorities are disproportionately represented in low-income populations and have been subjected to ‘a long history of being last in line to obtain the new generations of

¹ See Reply Comment Sought in Support of National Broadband Plan, NBP Public Notice # 30, GN Docket Nos. 09-47, 09-51, 09-137, DA 10-61 (rel. Jan. 13, 2010).

² Notice of Inquiry, In the Matter of A National Broadband Plan for Our Future, GN Docket No. 09-51 (rel. April 8, 2009).

technology and communications which are the basic steppingstones to social and economic advancement in our society.’’³

Throughout this proceeding, MMTC and other civil rights organizations have repeatedly urged the Commission, in broadband workshops, filings, and field hearings, to give conspicuous and specific consideration to minority communities and businesses. However, the National Broadband Plan Policy Framework omitted critical issues for the constituents of leading civil rights organizations.⁴

On January 4, 2010, we voiced these concerns in a letter to Blair Levin.⁵ Subsequently, on January 22, Mr. Levin and Commissioner Clyburn spoke at our Broadband and Social Justice Summit held at Howard University.⁶ In his address, Mr. Levin described the important functions of broadband in the lives of Americans and the lost opportunities for those not online.⁷ Further, Mr. Levin illustrated three means to address the adoption challenge: social infrastructure, social innovation, and social purpose media.⁸ In referencing what is in store for our country, he stated:

³ Initial Comments of the Broadband Diversity Supporters, In the Matter of A National Broadband Plan for Our Future, GN Docket No. 09-51, p. 10 (Originally filed June 8, 2009; Corrected Copy filed July 5, 2009) (citing Comments of the Broadband Diversity Supporters, In the Matter of Joint National Telecommunications and Information Administration-Rural Utilities Service Request for Information, Docket No. 090309298-9299-01, at 3 (filed April 13, 2009)).

⁴ See Letter from David Honig, President and Executive Director, MMTC to Blair Levin, Executive Director of the Broadband Initiative, Federal Communications Commission, RE: The Commission’s National Broadband Plan Policy Framework, GN Dockets 09-47, 09-51, and 09-137 (filed Jan. 4, 2010) (“MMTC January 4th Letter”) (setting forth a detailed account of issues not included in the Framework, and noting that the Framework did not include references to, inter alia, minorities, minority businesses, or the digital divide.)

⁵ See id.

⁶ See Blair Levin, Executive Director, Omnibus Broadband Initiative, Federal Communications Commission, Wired for Social Justice Speech at the MMTC Broadband and Social Justice Summit (Jan. 22, 2010).

⁷ See id.

⁸ See id.

But even if we can't precisely predict our digital future we know that it leads to **more**. More opportunities to communicate, more viewpoints, more ideas, more services, more choices, more businesses, more people working together to solve problems that require collaboration and more potential customers.

But to achieve more, we must include more Americans. We must ensure that there are no digital second-class citizens.⁹

In her keynote address, Commissioner Clyburn recognized the essential nature of broadband, the high stakes of non-adoption, and the risk of widening the digital divide.¹⁰ In recognizing these challenges, Commissioner Clyburn offered hope for solutions, which she found from meeting with the broadband adoption team, working with private parties on adoption efforts, and seeing results in minority home broadband adoption surveys.¹¹

Furthermore, in a letter to Henry Rivera, Chairman of the Diversity Committee, Chairman Genachowski recently addressed the Commission's awareness of, and efforts to close, the digital divide: "...I reiterate that these gaps must be addressed boldly for America to take full advantage of the benefits of universal broadband. In the National Broadband Plan, the agency will identify the proactive steps the Commission will take that we believe will assist the effort to close the digital divide."¹²

We are heartened to hear of the Commission's ongoing commitment to addressing the concerns expressed in our January 4th letter.¹³ We look forward to seeing Plan comprehensively

⁹ Id.

¹⁰ See Commissioner Mignon L. Clyburn, Commissioner, Federal Communications Commission, Keynote Address at the MMTC Broadband and Social Justice Summit (Jan. 22, 2010).

¹¹ See id.

¹² See Letter from Chairman Julius Genachowski, Chairman, Federal Communications Commission, to Henry Rivera, Chairman, Advisory Committee for Diversity in the Digital Age (Jan. 5, 2010).

¹³ See MMTC January 4th Letter.

address broadband access and adoption by minorities, and the inclusion of minority business as a full partner in the construction and maintenance of broadband facilities.

Respectfully submitted,



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