

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

In the Matter of )  
 )  
Technological Transition of the ) GN Docket No. 12-353  
Nations Communications )  
Infrastructure )  
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**COMMENTS OF THE MINORITY MEDIA AND TELECOMMUNICATIONS  
COUNCIL, NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED  
PEOPLE, 100 BLACK MEN OF AMERICA, A. PHILIP RANDOLPH INSTITUTE,  
INTERNATIONAL BLACK BROADCASTERS ASSOCIATION, MINORITY  
BUSINESS ENTERPRISE LEGAL DEFENSE AND EDUCATION FUND, NATIONAL  
ASSOCIATION OF BLACK COUNTY OFFICIALS, NATIONAL ASSOCIATION OF  
BLACK OWNED BROADCASTERS, NATIONAL ASSOCIATION OF  
NEIGHBORHOODS, NATIONAL BLACK COLLEGE ALUMNI HALL OF FAME,  
NATIONAL BLACK FARMERS ASSOCIATION, NATIONAL COALITION ON  
BLACK CIVIC PARTICIPATION, NATIONAL ORGANIZATION OF BLACK  
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**I. Summary and Introduction**

The undersigned organizations<sup>1</sup> (“Joint Commenters” or “we”) respectfully express our support for the relief (*i.e.*, a market test) sought in AT&T’s Petition (“AT&T Petition”),<sup>2</sup> which calls for a national dialogue regarding America’s transition to all Internet Protocol (“IP”) enabled networks. We respectfully encourage the FCC to grant rapid approval of the relief sought in the Petition.

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<sup>1</sup> Minority Media and Telecommunications Council at <http://mmtconline.org/>; National Association for the Advancement of Colored People at <http://www.naacp.org/>; 100 Black Men of America at <http://www.100blackmen.org/home.aspx>; A. Philip Randolph Institute at <http://www.apri.org/>; International Black Broadcasters Association at <http://www.ibbainc.com/>; Minority Business Enterprise Legal Defense and Education Fund at <http://mbeldef.homestead.com/about.html>; National Association of Black County Officials at <http://www.blackcountyofficials.com/>; National Association of Black Owned Broadcasters at <http://www.nabob.org/>; National Association of Neighborhoods at <http://www.nanworld.org/index.html>; National Black College Alumni Hall of Fame at <http://www.nbcahof.org/>; National Black Farmers Association at <http://www.blackfarmers.org/>; National Coalition on Black Civic Participation at <http://ncbcp.org/>; National Organization of Black Elected Legislative Women at [www.nobel-women.org](http://www.nobel-women.org/); Rainbow PUSH Coalition at <http://www.rainbowpush.org/>; United Negro College Fund at <http://www.uncf.org/>; United States Black Chamber, Inc. at <http://www.usblackchamber.org/>. This Petition reflects the institutional views of each of the Joint Commenters and is not intended to reflect the individual views of their respective officers, directors, members or staff.

<sup>2</sup> Petition of AT&T, *Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, GN Docket No. 12-353 (filed November 7, 2012) (“AT&T Petition” or “Petition”).

Our organizations focus on a variety of issues, including civil rights, education, health care and jobs, but we all share the goal of advancing African Americans and the African American community.

In its most recent infrastructure investment announcement, Project Velocity IP (“Project VIP”), AT&T pledged \$66 billion over the next three years in the deployment of next generation high-speed IP-enabled fixed and mobile networks.<sup>3</sup> We commend AT&T for its investment pledge and for its decision to proceed with its Project VIP investment irrespective of the FCC’s final determination in this proceeding.<sup>4</sup> This investment seeks to build out the all IP-based network infrastructure that will expand delivery of key next-generation IP-enabled services and applications throughout AT&T’s service territory, bringing these 21<sup>st</sup> Century services and other economic opportunity to more African Americans.

*A. President Obama’s universal broadband access goals & the FCC’s National Broadband Plan both recognize the need for IP Transition.*

In a 2011 speech, President Obama articulated his guiding principles for the future of telecommunications in the United States. “Every American,” he said, “deserves access to the world’s information. Every American deserves access to the global economy.”<sup>5</sup> As the President observed,<sup>6</sup>

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<sup>3</sup> Press Release, “AT&T to Invest \$14 Billion to Significantly Expand Wireless and Wireline Broadband Networks, Support Future IP Data Growth and New Services” AT&T (November 7, 2012), *available at* <http://www.att.com/gen/press-room?pid=23506&cdvn=news&newsarticleid=35661> (last accessed January 17, 2013).

<sup>4</sup> AT&T brings a long track record of service to the IP transition issue. For years, AT&T has been at the forefront of adopting progressive policies to promote diversity in supplier practices, community investment and philanthropy. Black Enterprise named AT&T as one of the 40 Best Companies for Diversity in 2012, *available at* <http://cdn-live2.blackenterprise.net/wp-content/blogs.dir/1/files/2012/07/2012-Best-Companies-For-Diversity.pdf>; Diversity Inc. named AT&T the No. 3 Company for Blacks and No. 2 for Supplier Diversity in 2012, *available at* <http://www.diversityinc.com/top10companiesblacks/> and *at* <http://www.diversityinc.com/top10supplierdiversity/>; DiversityBusiness.com named AT&T No. 1 “Organization for Multicultural Business Opportunities” in 2012; AT&T was named one of the Best Places to Work by the Human Rights Campaign Corporate Equity Index in 2012, *available at* <http://www.hrc.org/resources/entry/best-places-to-work-2012>; Profiles in Diversity Journal recognized AT&T with its Diversity Leader Award in 2011, *available at* <http://www.diversityjournal.com/5791-2011-diversity-leader-award-winners>. Today 19% of AT&T’s workforce is African American, many of whom help comprise the almost 60% of AT&T employees company-wide that are union represented. *See* AT&T, “AT&T Supports Union Members,” *available at* <https://www.wireless.att.com/businesscenter/promotions/union-plus.jsp> (last accessed January 18, 2013). For over 40 years, AT&T has advanced supplier diversity and in 2011 the company spent over \$12 billion with diverse suppliers. AT&T, *2011 Sustainability Report: People and Community*, *available at* <http://www.att.com/gen/corporate-citizenship?pid=12307> (last accessed January 17, 2013); AT&T has contributed \$115 million through corporate, employee and AT&T Foundation giving programs, a generous portion of which has been allocated to projects to strengthen the African American community.

<sup>5</sup> *See* “Remarks by the President on the National Wireless Initiative,” The White House, Office of the Press Secretary (February 10, 2011), *available at* [www.whitehouse.gov/the-press-office/2011/02/10/remarks-president-national-wireless-initiative-marquette-michigan](http://www.whitehouse.gov/the-press-office/2011/02/10/remarks-president-national-wireless-initiative-marquette-michigan) (last accessed January 18, 2013).

<sup>6</sup> *See* “We Can’t Wait: President Obama Signs Executive Order to Make Broadband Construction Faster and Cheaper,” The White House, Office of the Press Secretary (June 13, 2012), *available at* [www.whitehouse.gov/the-](http://www.whitehouse.gov/the-)

broadband access is changing the way we live and work, creating jobs and opportunities while fueling advancements in areas such as health care and education. And as broadband offerings evolve, requiring ever-increasing speeds and bandwidth capacity, next-generation IP broadband will become increasingly central to our communication needs. The FCC's National Broadband Plan recognizes this, calling the transition to all-IP networks, "*the great infrastructure challenge of the early 21st Century.*"<sup>7</sup>

The beta-trials proposed by AT&T in its Petition represent a sensible method of determining how to undertake this transition. The Petition offers a balanced approach for the FCC as it begins to further its objective of nationwide deployment of next-generation networks. Many questions will need to be addressed and answered as part of these trials and throughout the transition itself. In supporting the relief sought in the Petition to initiate geographically defined beta tests, we reserve judgment, at this time, on specific recommendations as to how the Commission can best address our existing and on-going interest in the provision of service to underserved populations; ensuring high rates of service adoption across all levels of income, race, and primary language; promoting service affordability and the availability of competitive alternatives in the marketplace. We look forward to engaging the Commission and industry—with greater specificity-- on these important issues when actual plans and proposals for beta-trials are filed at the agency.

In the interim, the incremental approach of geographically limited trials provides the best means to obtain stakeholder and expert input to help raise and resolve complex issues in an open and transparent process. With minimal consumer disruption, the beta-trials would enable policymakers to choose the best and fastest path of how to migrate consumers from antiquated 20<sup>th</sup> century "voice only" networks to the networks, services, and applications that will directly benefit the nation's economy and the African American community in particular.

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[press-office/2012/06/13/we-can-t-wait-president-obama-signs-executive-order-make-broadband-const](http://www.fcc.gov/press-office/2012/06/13/we-can-t-wait-president-obama-signs-executive-order-make-broadband-const) (last accessed January 18, 2013).

<sup>7</sup> FCC, *Connecting America: The National Broadband Plan*, at 3 (2010) ("*National Broadband Plan*"), Federal Communications Commission, available at <http://www.broadband.gov/plan/executive-summary/> (emphasis added) (last accessed January 28, 2013).

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*B. African Americans are rapidly embracing broadband technology.*

Given the vital role of broadband technology in the African American community and in the digital economy, policymakers should promote policies that spur the transition to IP and next generation high-speed broadband network build-out. Rapid deployment of these networks—both wired and wireless—would bring the benefits of advanced broadband access and services to more Americans, including members of the African American community. African Americans have enthusiastically embraced broadband technologies. African Americans have outpaced the general population in their adoption of mobile technologies (49% of African Americans use smartphones compared to 45% of whites<sup>8</sup>) and they are more than twice as likely to use smartphones to access the Internet.<sup>9</sup> African Americans also lead all demographic groups in accessing social media sites, with 70% of the community engaging in social media.<sup>10</sup> Unfortunately, home based wired broadband connectivity for African Americans trails the connectivity in the white community by 17 percentage points.<sup>11</sup> Moreover 80% of white Americans connect to the Internet, while only 71% of African Americans do so.<sup>12</sup> These trends point to affordability as a significant concern for African Americans when choosing broadband service. Indeed, the Joint Center for Political and Economic Studies reports that affordability is the number one impediment to African American broadband adoption.<sup>13</sup> That is not surprising inasmuch as African American annual median income is almost \$18,000 lower than the national

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<sup>8</sup> Pew Research, *Digital Differences*, at 17, Pew Research: Internet & American Life Project (April 13, 2012) available at [pewinternet.org/~media/Files/Reports/2012/PIP\\_Digital\\_differences\\_041312.pdf](http://pewinternet.org/~media/Files/Reports/2012/PIP_Digital_differences_041312.pdf) (last accessed January 18, 2013) (“*Digital Differences Report*”).

<sup>9</sup> *Id.* at 19.

<sup>10</sup> *Id.* at 13; see also Press Release “The U.S. Black Chamber, Inc. launches new Social Media Campaign: “Working for Change: Engaging Black Businesses through Social Media” (November 26, 2012), available at <http://usblackchamber.org/pdf/smcpr.pdf> (last accessed January 28, 2013).

<sup>11</sup> *Id.* at 10, indicating that “62% of all American adults have high-speed internet access at home, including two thirds (66%) of whites and roughly half of African Americans (49%) and Hispanics (51%).”

<sup>12</sup> *Id.* at 5.

<sup>13</sup> Kenneth Mallory and Tiffany Bain, “National Urban League: Broadband Internet Is Fundamental to Civil Rights,” *Politics365* (July 27, 2012), available at <http://politic365.com/2012/07/27/national-urban-league-broadband-internet-is-fundamental-to-civil-rights/> (last accessed January 28, 2013).

average;<sup>14</sup> further, according to Pew, the wealth gap separating African Americans and white Americans is an astonishing 20:1.<sup>15</sup> For most families, laptops and desktop computers must be purchased from wealth, not income.

The IP transition envisioned in the AT&T Petition could provide greater choices for consumers by creating additional advanced broadband service offerings in the marketplace, thus potentially making a wide range of services more affordable for the direct benefit of African American residential subscribers, as well as African American analog and digital entrepreneurs. African American annual median income is almost \$18,000 lower than the national average<sup>16</sup> making affordability a fundamental barrier to adoption among African Americans. Policies that encourage the rapid build-out of more IP-enabled broadband networks would help create additional competitive and affordable options for home broadband service.

Further, from a cost allocation standpoint, the IP transition as contemplated in the Petition is progressive: it would tend to shift the ultimate responsibility for huge fixed capital expenditure costs, attendant to maintaining redundant copper facilities, away from low-income consumers. We have always enthusiastically supported progressive cost allocation (and tax) policies that help lift the poor out of poverty rather than push them deeper into poverty.

In light of the African American community's interest in service affordability, we encourage the Commission to include affordability, pricing and adoption rates of newly deployed IP-enabled broadband service in its analysis of future beta-trials and formulation of policies necessary to expedite the transition to all-IP networks.

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<sup>14</sup> Brenton L. Hudson, "Median Household Income Gap at \$18,000," Black PRWire (April 28, 2012), *available at* [http://www.blackprwire.com/press-releases/3523-bprw\\_median\\_household\\_income\\_gap\\_at\\_18000](http://www.blackprwire.com/press-releases/3523-bprw_median_household_income_gap_at_18000) (last accessed January 18, 2013).

<sup>15</sup> Tami Luhby, "Worsening Wealth Inequality by Race," CNNMoney (June 21, 2012), *available at* <http://money.cnn.com/2012/06/21/news/economy/wealth-gap-race/index.htm> (last accessed January 28, 2013).

<sup>16</sup> Brenton L. Hudson, "Median Household Income Gap at \$18,000," Black PRWire (April 28, 2012), *available at* [http://www.blackprwire.com/press-releases/3523-bprw\\_median\\_household\\_income\\_gap\\_at\\_18000](http://www.blackprwire.com/press-releases/3523-bprw_median_household_income_gap_at_18000) (last accessed January 18, 2013).

## **II. Access to advanced IP-enabled broadband networks and services provides critical economic and societal benefits for African Americans**

IP broadband networks can provide the African American community with increased access to a range of technologies, devices and services that can enrich our lives, personally and professionally. By approving the AT&T Petition, the Commission would accelerate a digital communications transition that goes beyond the modernization of America's network infrastructure. It would significantly increase minority access to professional development, education, healthcare, and social connectivity options.

### *A. Deployment of IP-based networks would accelerate job growth and economic opportunity.*

In the midst of economic recovery, African Americans continue to face staggering unemployment. In a national economy that is currently confronting 7.9% nationwide unemployment, the African American community is experiencing higher unemployment at 14%.<sup>17</sup>

Expanding access to high-speed broadband is a significant step toward addressing this problem for the nation as a whole and for the African American community specifically. Information and communications technology based industries are the fastest growth sectors in the economy and constitute a passkey for extensive entrepreneurship opportunities for African American and urban communities.<sup>18</sup> These industry sectors are not only growing, they are thriving. The media, telecommunications and wireless industries now comprise one-sixth of the national economy.<sup>19</sup>

Moreover, the link between broadband penetration and economic growth on a national scale is well established. A five-year study of the OECD's broadband market concluded that a 10% increase in

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<sup>17</sup> US Department of Labor, Bureau of Labor Statistics, "Employment status of the civilian population by race, sex, and age," Table A-2, Economic News Release (last modified January 4, 2013), *available at* <http://www.bls.gov/news.release/empsit.t02.htm> (last accessed January 18, 2013).

<sup>18</sup> Marcella Gadson, "David Honig Alerts the Nation's Leaders to the Current Trends on Spectrum Shortage and African Americans at the World Conference of Mayors" Minority Media & Telecom Council: Broadband & Social Justice (May 28, 2012), *available at* <http://broadbandandsocialjustice.org/2012/05/david-honig-alerts-the-nations-leaders-to-the-current-trends-on-spectrum-shortage-and-African-Americans-at-the-world-conference-of-mayors/> (last accessed January 18, 2013).

<sup>19</sup> Michael R. Shea, "The Full Spectrum," Columbia College Today (Summer 2012), *available at* <http://www.college.columbia.edu/cct/summer12/features2> (last accessed January 18, 2013).



broadband penetration yielded a 0.25% increase in GDP growth.<sup>20</sup> In the U.S. mobile industry, a 10% gain in 4G LTE penetration is expected to produce a gain in the overall economy of 231,000 jobs.<sup>21</sup>

For the African American community, the benefits of accelerating a nationwide transition to an all-IP network are, as a 2013 National Urban League Institute report concludes, “enhanced job creation in communities hardest hit by joblessness, and... enhanced ability of African Americans and others who are hit hardest by joblessness to compete for those jobs.”<sup>22</sup> Thus, access to high-speed IP-based broadband can potentially create multiple “windows of opportunity” to help secure economic empowerment in the 21<sup>st</sup> century economy. Access to faster and more robust technologies can expand employment-seeking opportunities as a higher percentage of African Americans (78%) and Hispanics (64%) use the Internet for job searches as compared to whites (48%).<sup>23</sup> Moreover, IP-enabled services and applications would play a pivotal role in the future development and growth of African American business, given that the percentage of African American Internet users researching starting a business (28%) is twice that of whites (14%).<sup>24</sup>

*B. Deployment of IP-based networks would help unleash educational opportunities.*

Our 21<sup>st</sup> Century skills-based economy demands a highly educated workforce. The IP Transition, which the Petition seeks to accelerate, would help provide better access to educational attainment that will prepare the African American community for the jobs of tomorrow. Today, African Americans lag in education compared with other groups. Less than two-thirds of African Americans (64%) graduate from

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<sup>20</sup> See P. Koutroumpis, *The Economic Impact of Broadband on Growth: A Simultaneous Approach, Telecommunications Policy*, at 471-485 (2009), as cited in International Telecommunications Union, *Impact of Broadband On the Economy* (April 2012), available at [http://www.itu.int/ITU-D/treg/broadband/ITU-BB-Reports\\_Impact-of-Broadband-on-the-Economy.pdf](http://www.itu.int/ITU-D/treg/broadband/ITU-BB-Reports_Impact-of-Broadband-on-the-Economy.pdf) (last accessed January 18, 2013).

<sup>21</sup> Robert J. Shapiro and Kevin A. Hassett, NDN, *The Employment Effects of Advances in Internet and Wireless Technology: Evaluating the Transitions from 2G to 3G and from 3G to 4G* (January 2012), available at [http://ndn.org/sites/default/files/blog\\_files/The%20Employment%20Effects%20of%20Advances%20In%20Internet%20and%20Wireless%20Technology\\_1.pdf](http://ndn.org/sites/default/files/blog_files/The%20Employment%20Effects%20of%20Advances%20In%20Internet%20and%20Wireless%20Technology_1.pdf) (last accessed January 13, 2013) noting “[t]his analysis estimates that under the current transition, every 10 % increase in the adoption of 3G and 4G wireless technologies could add more than 231,000 new jobs to the U.S. economy in less than a year.”

<sup>22</sup> Madura Wijewardena, Chanelle Hardy and Dr. Valerie Wilson, *Connecting the Dots: Linking Broadband Adoption to Job Creation and Job Competitiveness* at 6, National Urban League Policy Institute (Winter 2012), available at [http://www.twcresearchprogram.com/pdf/TWC\\_WijewardenaReport.pdf](http://www.twcresearchprogram.com/pdf/TWC_WijewardenaReport.pdf) (last accessed January 18, 2013).

<sup>23</sup> Jon P. Gant, PhD, et al., *National Minority Broadband Adoption: Comparative Trends in Adoption, Acceptance and Use*, at 20 (February 2010), available at [internetinnovation.org/files/special-reports/Minority\\_Broadband\\_Adoption\\_Joint\\_Center\\_22010.pdf](http://internetinnovation.org/files/special-reports/Minority_Broadband_Adoption_Joint_Center_22010.pdf) (last accessed January 17, 2013).

<sup>24</sup> *Id.* at 21.

high school on time, 12 percentage points lower than the rate for whites.<sup>25</sup> Moreover, less than 20% of African Americans 25 years and over reported having a bachelor's degree or more in 2011.<sup>26</sup>

The expansion of affordable high-speed broadband offers perhaps our best hope to close this “education gap.” Black colleges and university centers would benefit immediately from the IP-enabled services and applications that would be made available if these educational institutions were served by the initial wire centers participating in the beta tests. For those seeking education opportunities, including job training, the spread of IP-based broadband networks would offer greater access to online courses. Improving connectivity on the campuses of minority serving institutions compliments the President's goal of increasing access to broadband technology across the country and supports the development of technology education and distance learning.<sup>27</sup> Today, Apple's iTunes U application features more than 500,000 free lectures from hundreds of universities including Stanford, Harvard and Oxford.<sup>28</sup> A 2012 federal survey reported that the number of high-school level students in distance education more than tripled between 2005 and 2010.<sup>29</sup> Distance learning opportunities can provide a means of overcoming the relative dearth of advanced course offerings in some urban schools.<sup>30</sup> According to the College Board Advocacy and Policy Center, as of 2010 only 34% of school districts offered Advanced Placement or International Baccalaureate courses in English, math, social studies, and science.<sup>31</sup>

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<sup>25</sup> Science and Engineering Indicators 2012, National Science Foundation, *Chapter 1. Elementary and Secondary Mathematics and Science Education*, National Science Foundation, available at <http://www.nsf.gov/statistics/seind12/c1/c1s4.htm> (last accessed January 16, 2013).

<sup>26</sup> U.S. Census Bureau, *Educational Attainment in the United States: 2011* (February 23, 2012), available at [http://www.census.gov/newsroom/releases/pdf/bullet\\_1\\_cb12-33.pdf](http://www.census.gov/newsroom/releases/pdf/bullet_1_cb12-33.pdf) (last accessed January 18, 2013).

<sup>27</sup> See “Minority Serving Institutions Digital and Wireless Technology Program Fact Sheet,” available at <http://www.uncf.org/sites/advocacy/documents/One.Page/MSI.Digital.Divide.One.Pager.pdf>

<sup>28</sup> See generally “iTunes U: A lifetime of learning on tap,” available at <http://www.apple.com/apps/itunes-u/> (last accessed January 18, 2013).

<sup>29</sup> National Center for Education Statistics, “Fast Facts: Distance Learning,” Table 110, available at [nces.ed.gov/fastfacts/display.asp?id=79](http://nces.ed.gov/fastfacts/display.asp?id=79) (last accessed January 17, 2013), noting that the number of students rose from “just over 300,000” to 1.3 million.

<sup>30</sup> See generally Diane Rado, “Inequities found in area Advanced Placement course choices,” *The Dallas Morning News* (December 7, 2009), available at <http://www.dallasnews.com/news/education/headlines/20091206-Inequities-found-in-area-Advanced-Placement-3907.ece> (last accessed January 18, 2013).

<sup>31</sup> John Michael Lee, Jr., et al., *The College Completion Agenda 2011 Progress Report*, at 100, College Board Advocacy and Policy Center (2011) available at [completionagenda.collegeboard.org/sites/default/files/reports\\_pdf/Progress\\_Report\\_2011.pdf](http://completionagenda.collegeboard.org/sites/default/files/reports_pdf/Progress_Report_2011.pdf) (last accessed January 17, 2013).

The potential financial benefits of expanded distance learning through accelerated IP-based network deployment can assist states and municipalities in dealing with the budget constraints currently facing many school districts by reducing overall costs. The estimated U.S. average expenditure per pupil for a fully-online model (\$6,400) is almost 30% below per-pupil spending on a blended-learning model (\$8,900) and even more dramatically lower than per-pupil costs at traditional “brick and mortar” schools (\$10,000).<sup>32</sup>

Thus, as IP networks become more ubiquitous, African Americans will be able to more easily access educational opportunities in a cost-effective way. As costs are reduced, these savings can be shared with minority serving institutions, increasing their ability to educate and graduate more African Americans, thus enhancing the community’s prospects for educational advancement.

*C. Deployment of IP-based networks would advance access to tele-health services and applications.*

Access to affordable healthcare remains a nationwide problem, particularly for African Americans, who are generally less likely to seek and receive healthcare services than the general population.<sup>33</sup> The growth of tele-health, enabled by high-speed broadband networks, is a seminal development in healthcare. As the National Broadband Plan states, “broadband ... removes barriers of time and space.”<sup>34</sup> Tele-health can now enable a patient to be monitored at home 24 hours a day, seven days a week. It also empowers the elderly and frail to avoid frequent trips to the doctor’s office that might expose them to illness.<sup>35</sup> Therefore, encouraging the continued transition to IP networks could help to further expand healthcare access and treatment

African Americans are in dire need of more and better healthcare. African Americans currently have the highest mortality rate of any racial or ethnic group for all cancers combined,<sup>36</sup> and are 40% more likely to

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<sup>32</sup> Tamara Battaglino, *et al.*, *The Costs of Online Learning*, at 4, Thomas Fordham Institute, available at [gsehd.gwu.edu/documents/users/juliestella/The-costs-of-online-learning.pdf](http://gsehd.gwu.edu/documents/users/juliestella/The-costs-of-online-learning.pdf) (last accessed January 18, 2013).

<sup>33</sup> U.S. Department of Health & Human Services, *Addressing Racial and Ethnic Disparities in Health Care: Fact Sheet*, Agency for Healthcare Research and Quality, available at <http://www.ahrq.gov/research/disparit.htm> (last accessed January 17, 2013).

<sup>34</sup> *National Broadband Plan* at 193.

<sup>35</sup> *Id.*

<sup>36</sup> U.S. Cancer Statistics Working Group, *United States Cancer Statistics: 2009*, Department of Health and Human Services, Centers for Disease Control and Prevention, and National Cancer Institute, available at <http://apps.nccd.cdc.gov/uscs/cancersbyraceandethnicity.aspx> (last accessed January 18, 2013).

have high blood pressure.<sup>37</sup> While African Americans make up only 14% of the U.S. population, in 2009 African Americans accounted for 43% of HIV infection cases.<sup>38</sup>

Improved tele-health through expanded access to IP broadband can improve African Americans' quality of life and facilitate the treatments that many so desperately need. Accessible broadband means real-time transmission of x-rays, imaging and other data for medical evaluation by specialists in another state. Telemedicine has already been shown to improve blood pressure and blood readings of diabetics in low-income communities, resulting in fewer emergency room visits and a reduction in hospital readmissions.<sup>39</sup>

**III. The FCC should move quickly to approve the relief sought in AT&T's Petition so that all Americans, including African Americans, can experience all the benefits that modern 21<sup>st</sup> century IP-based networks can offer.**

For the reasons discussed above, we support the relief sought (*i.e.*, a market test) in AT&T's Petition, which puts forth an innovative roadmap toward a full transition to all-IP networks and all-IP services in the U.S. This Petition offers the FCC an opportunity to test the process of full transition in a controlled, structured, incremental way with broad stakeholder input. Such a measured approach, with clear timelines, would limit consumer disruption and provides an opportunity for the FCC to work constructively with the private sector, leading America's IP transition and bringing the finest in IP broadband technology to the African American community and all Americans.

We strongly recommend that the FCC act quickly on AT&T's Petition. Expedition is critical because issues of critical importance to the African American community sometimes fall through the cracks at the FCC (*e.g.*, minority media ownership, prison payphones, and equal employment opportunity transparency). Review of AT&T's Petition should be expedited in order to offer an opportunity to expand IP networks that would spur job creation, unleash innovation, create better healthcare, improve education and promote a better quality of life for African Americans.

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<sup>37</sup> The Office of Minority Health, *Heart Disease and African Americans*, U.S. Department of Health & Human Services (last modified August 29, 2012), available at <http://minorityhealth.hhs.gov/templates/content.aspx?ID=3018> (last accessed January 18, 2013).

<sup>38</sup> Centers for Disease Control and Prevention, "HIV in the United States: At a Glance," U.S. Department of Health & Human Services (last modified December 12, 2012), available at <http://www.cdc.gov/hiv/resources/factsheets/us.htm> (last accessed January 15, 2013).

<sup>39</sup> eHealth Initiative, "An Issue Brief on eHealth Tools and Diabetes Care for Socially Disadvantaged Populations," available at <http://www.ehealthinitiative.org/resources/viewdownload/39/551.html> (last accessed January 28, 2013).

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