

May 1, 2023

The Honorable Alan Davidson
Assistant Secretary of Commerce for Communications and Information
National Telecommunications and Information Administration
1401 Constitution Avenue NW
Washington, DC 20230

Re: Notice and Request for Comment – Digital Equity Act, NTIA-2023-0002

Dear Assistant Secretary Davidson,

As a coalition of diverse organizations dedicated to connecting underserved communities with high-speed, reliable, and affordable broadband, we write today to provide guidance to the Department of Commerce's National Telecommunications and Information Administration (NTIA) regarding the implementation of the Digital Equity Act (DEA) of 2021 Grant Program. Specifically, we offer our insights on the design and implementation of two key components of this grant program: 1) the \$1.44 billion State Digital Equity Capacity Grant, and 2) the \$1.25 billion Digital Equity Competitive Grant Program.

The Infrastructure Investment and Jobs Act of 2021 (IIJA) made a historic investment of \$65 billion in broadband infrastructure to help close the digital divide. We believe that the \$48 billion in Bipartisan Infrastructure Law funding¹, which NTIA is responsible for distributing, can be allocated efficiently and effectively if multicultural stakeholders and diverse community organizations are engaged in the development and implementation of digital equity programs. These programs fall under the purview of the \$2.75 billion Digital Equity Act of 2021.

The digital economy has undergone significant transformation, particularly in light of the COVID-19 pandemic. Remote work and online education have become increasingly commonplace, and the need for digital readiness and home internet access has never been more critical. We fully support the goals of the Bipartisan Infrastructure Law, including the vital objective of ensuring that every household in America has access to broadband connectivity. To this end, we believe that the DEA must work in tandem with federal programs such as the Affordable Connectivity Program (ACP) to advance digital equity and inclusion efforts at both the national and state levels.

Universal connectivity and adoption are essential for addressing economic, educational, social, and health disparities in our country. When communities have access to broadband, digital engagement increases, leading to improved quality of life and improved economic outcomes. A study by Connected Nation found that when broadband access, adoption, and usage is incorporated into community development and equity planning, economic outcomes improve.² The benefits of connectivity extend to

¹ National Telecommunications and information Administration, NTIA IIJA Broadband Programs: Overview for State and Local Governments, January 2022, https://broadbandusa.ntia.doc.gov/sites/default/files/2022-02/State_Local%20IIJA%202-Pager_Final%2001.27.2022.pdf

² Connected Nation, Study: Expanding Broadband Linked to Economic Growth, September 22, 2021, <https://connectednation.org/blog/2021/09/22/study-expanding-broadband-linked-to-economic-growth/>

services such as telemedicine, digital banking, and online shopping. A 2021 report by Deloitte affirms that enhanced broadband coverage, adoption, and speed can lead to incremental job growth across the country.³

Despite these proven benefits, recent Census Bureau American Community Survey findings state that at least 32.7 million households (71.6 million Americans) have yet to adopt broadband⁴ – a number that exceeds the FCC’s estimate of more than 14 million Americans still lacking access to fixed, high-speed internet.⁵ Reasons for non-adoption can depend on a variety of factors, including income, age, geography, education, race, ethnicity, lack of access to devices, and trust. To increase broadband adoption rates, greater emphasis must be placed on the development and implementation of digital readiness programs that are poised to meet the unique needs and challenges of local communities.

For example, several of our respective organizations have been engaged in developing and implementing programs focused on promoting ACP. This digital equity work is critical to ensuring that local communities are aware of this important program and have the digital tools and readiness training needed to boost program participation. The unique advantage that many of our organizations have is our understanding of the communities we serve and the trust that communities have in our work, and that of our local affiliates and partners on the ground.

Assessing State Digital Equity Plans under the Digital Equity Planning Grant⁶

To achieve meaningful change for communities across the country, NTIA must ensure that stakeholders engaged in the implementation of State Digital Equity Plans reflect the diversity and multicultural representation of each state. Millions of Americans are not adopting broadband even when it is available to them. Reasons for non-adoption vary based on demographic and socio-economic factors. According to the U.S. Department of Commerce’s Internet Use Survey results, the main barrier for non-adoption is a lack of interest or perceived benefit/need for connectivity.⁷ Approximately 56 percent of households surveyed cited this as the main reason for not subscribing to home internet.⁸ Organizations involved in

³ Deloitte, Quantifying the Economic Impact of Closing the Digital Divide: Analysis shows criticality of broadband infrastructure to the U.S. economy (Press Release), May 3, 2021, <https://www2.deloitte.com/us/en/pages/about-deloitte/articles/press-releases/quantifying-the-economic-impact-of-closing-the-digital-divide.html>

⁴ U.S. Census Bureau, American Community Survey Report, Computer and Internet Use in the United States: 2018, April 2021, <https://www.census.gov/content/dam/Census/library/publications/2021/acs/acs-49.pdf>

⁵ FCC, Fourteenth Broadband Deployment Report (Data for 2019, Released 01/19/21, Page 20, Fig. 1), <https://docs.fcc.gov/public/attachments/FCC-21-18A1.pdf>

⁶ NTIA Digital Equity RFC, *Question 1: During the public comment period for the States’ Digital Equity Plans, what guidance should NTIA and/or each State provide to enable communities to review and provide actionable feedback to States regarding their State Digital Equity Plans? What criteria/factors/outcomes should communities focus on in their review? How can NTIA ensure that States/Territories consult with Tribal entities about how best to meet Tribal members’ needs?* Page 10, https://ntia.gov/sites/default/files/publications/digital_equity_rfc_final.pdf

⁷ Digital Nation Data Explorer, National Telecommunications and Information Administration (ntia.gov), October 5, 2022, <https://ntia.gov/other-publication/2022/digital-nation-data-explorer#sel=noNeedInterestMainReason&demo=&pc=prop&disp=chart>

⁸ *Ibid*

digital inclusion efforts should have a proven track record of developing and implementing successful digital readiness programs, campaigns, and initiatives.

Digital Equity Competitive Grant and BEAD⁹

Achieving digital equity and promoting digital inclusion require careful consideration of programs with proven results and favorable outcomes. Priority should be given to underprivileged communities and those with limited digital readiness resources. Additionally, broadband adoption and digital readiness programs should be accompanied by increased awareness of programs like ACP to improve information sharing and adoption rates. A recent report by the Information Technology and Innovation Foundation (ITIF) affirms that the U.S. leads the world in broadband deployment.¹⁰ According to the report, high-speed service is available to 98 percent of U.S. households but the country's adoption rates are "closer to average for developed countries at 90 percent."¹¹ Broadband adoption continues to be a key barrier and challenge for many communities across the country.

Prioritizing Digital Equity in BEAD¹²

In states with readily available high-speed internet, NTIA's Broadband Equity, Access, and Deployment (BEAD) program can support adoption efforts through digital equity programs focused on digital skilling/readiness, supplying digital devices (i.e., laptops), and promoting key broadband programs like ACP. We encourage NTIA to leverage BEAD funding to develop broadband adoption programs in states where availability challenges have been addressed. BEAD funding can supplement DEA programs, focusing on increasing adoption of existing broadband services and ensuring the success of digital adoption and readiness programs.

This approach will prevent overbuilding of broadband networks and avoid the misuse of federal funds. By strategically leveraging BEAD funding to support DEA grant programs, NTIA can place a greater emphasis on encouraging more consumers to adopt broadband services that are already available in their communities. This targeted approach will contribute to the overall success of digital adoption and readiness programs developed with the support of NTIA broadband funding.

⁹ NTIA Digital Equity RFC, *Question 11: What rules, if any, should the Assistant Secretary develop to ensure that digital equity is achieved in the Competitive Grant Program?* Page 16, https://ntia.gov/sites/default/files/publications/digital_equity_rfc_final.pdf

¹⁰ ITIF, *The State of US Broadband in 2022: Reassessing the Whole Picture*, December 5, 2022, <https://itif.org/publications/2022/12/05/state-of-us-broadband-in-2022-reassessing-the-whole-picture/>

¹¹ ITIF, *New Report Shows State of U.S. Broadband Deployment Is Strong; The Country's Biggest Challenge Is Broadband Adoption*, December 5, 2022, <https://itif.org/publications/2022/12/05/state-of-us-broadband-deployment-is-strong-countrys-biggest-challenge-is-broadband-adoption/>

¹² NTIA Digital Equity RFC, *Question 22: How can NTIA best ensure that States and Territories that receive funding under BEAD and Digital Equity Programs are closely aligning their planning efforts to close the equity gaps for all Covered Populations? How can NTIA work with the States, Territories, and their communities to promote the collective impact and outcomes between BEAD's Five-Year Action Plan and States' Digital Equity Plans to achieve equity for its Underrepresented Communities/Covered Populations?*, Page 22-23, https://ntia.gov/sites/default/files/publications/digital_equity_rfc_final.pdf

The Digital Adoption Gap¹³

The digital adoption gap remains a significant challenge in achieving universal connectivity and digital equity. While broadband infrastructure has expanded, adoption rates have not always kept pace, particularly in underserved and marginalized communities. Americans with lower incomes tend to adopt broadband at lower levels,¹⁴ which makes programs like ACP a critical bridge to ensuring universal broadband adoption. Nationally, there are more households failing to adopt broadband services than there are households with no access to internet connectivity. Approximately 71.6 million Americans have yet to adopt broadband¹⁵ – a number that exceeds the 14 million Americans with no access to fixed, high-speed internet.¹⁶

Broadband mapping efforts have been instrumental in identifying areas where broadband infrastructure is lacking, and efforts to continue to improve the accuracy of maps is a major step towards addressing the digital divide. However, addressing the digital adoption gap requires a comprehensive understanding of the barriers to adoption, which may include affordability, digital literacy, trust, and access to devices. According to recent Pew Research data, racial and ethnic populations, including Latino and African American, are known to under-index in broadband subscribership.¹⁷ We urge NTIA to consider these factors when designing and implementing grant programs under the Digital Equity Act.

¹³ NTIA Digital Equity RFC, *Question 23: How can NTIA encourage the design and implementation of Digital Equity Programs to support and advance the economic mobility of members of Underrepresented Communities/ Covered Populations to support BEAD implementation and broader economic outcomes (e.g., through new skills, upskilling, re-skilling, career pathways, and other high-quality workforce development activities)?*, Page 24, https://ntia.gov/sites/default/files/publications/digital_equity_rfc_final.pdf

¹⁴ Pew Research Center, *Digital divide persists even as Americans with lower incomes make gains in tech adoption*, June 22, 2021, <https://www.pewresearch.org/fact-tank/2021/06/22/digital-divide-persists-even-as-americans-with-lower-incomes-make-gains-in-tech-adoption/>

¹⁵ U.S. Census Bureau, *American Community Survey Report, Computer and Internet Use in the United States: 2018*, April 2021, <https://www.census.gov/content/dam/Census/library/publications/2021/acs/acs-49.pdf>

¹⁶ FCC, *Fourteenth Broadband Deployment Report (Data for 2019, Released 01/19/21, Page 20, Fig. 1)*, <https://docs.fcc.gov/public/attachments/FCC-21-18A1.pdf>

¹⁷ Pew Research Center, *Home broadband adoption, computer ownership by race, ethnicity is U.S. (July 16), 2021*, <https://www.pewresearch.org/fact-tank/2021/07/16/home-broadband-adoption-computer-ownership-vary-by-race-ethnicity-in-the-u-s/>

Recommendations

Promote Digital Readiness Training: We recommend that NTIA prioritize grant proposals that include digital readiness training programs. These programs should be designed to empower individuals with the skills and knowledge needed to navigate the digital world confidently and safely.

Increase Awareness of the Affordable Connectivity Program (ACP): The ACP provides a federal subsidy to make broadband more affordable for low-income households. We recommend that NTIA work collaboratively with the Federal Communications Commission (FCC) and relevant third party stakeholders to raise awareness of the ACP and ensure that eligible households are informed about the program and its benefits.

Engage Multicultural Stakeholders: To ensure that grant programs are culturally responsive and effective, we recommend that NTIA actively engage multicultural stakeholders and diverse community organizations in the development and implementation of digital equity programs to ensure barriers and challenges to broadband adoption are properly addressed.

Monitor and Evaluate Program Outcomes: To measure the impact of the Digital Equity Act grant programs, we recommend that NTIA establish mechanisms for monitoring and evaluating program outcomes. Data collected through this process can be used to inform future policy decisions and program improvements.

Conclusion

We commend NTIA for its efforts to advance digital equity and inclusion through the Digital Equity Act grant programs. As a coalition of diverse organizations dedicated to connecting underserved communities with broadband, we stand ready to support NTIA in achieving its goals. We believe that, by working together, we can help bridge the digital divide and ensure that all Americans have the opportunity to participate fully in today's digital economy. We look forward to contributing to the ongoing dialogue on digital equity and inclusion.

Sincerely,

Jose Antonio Tijerino, President and CEO, Hispanic Heritage Foundation

Rosa Mendoza, Founder, President and CEO, ALLVanza

Christopher Wood, Executive Director & Co-Founder, LGBT Technology Partnership

Robert E. Branson, President and CEO, Multicultural Media, Telecom, and Internet Council (MMTC)

Thu Nguyen, Executive Director, OCA-Asian Pacific American Advocates