



February 9, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket Nos. 11-42, 09-197, 10-90

Dear Secretary Dortch:

The American Library Association (ALA) and Benton Foundation share a deep commitment to ensuring no one in this nation is excluded from digital opportunity. We are on the recordⁱ urging the Commission to address three aspects of broadband adoption: ability, access, and affordability—or the A’s of broadband adoption and deployment. Similarly, Dr. Colin Rhinesmith referred in recent research to the four essentials for digital inclusion: low-cost broadband, digital literacy training with relevant content and services, low-cost computers and public access computing centers.ⁱⁱ

We are encouraged the Lifeline modernization effort is working to address the essential concern of affordability, and that the Commission also recognizes “that no one program or entity can solve this problem on its own and what is needed is many different organizations, vendors and communities working together to address this problem” of the homework gap, broadband access and adoption. It is vital people have the skills and confidence to use the internet. Without considering all of these issues, digital opportunity will continue to be stymied. Veteran researcher John Horrigan has referred to this as “digital readiness.”ⁱⁱⁱ

Virtually all U.S. public libraries provide assistance to people of all ages in using technology, building digital skills and meaningfully using broadband to support education, employment, access to government information and services and more. The Digital Inclusion Survey from University of Maryland Information Policy & Access Center with the ALA finds that libraries provide training ranging from basic internet search skills to safe online practices to website development—matching services to diverse populations and needs.^{iv} Mastering technology and online resources is not a one-time endeavor. Technology is constantly changing, and skills must be honed and transferable to new situations.

As the Commission revisits the Lifeline program to determine how it should be structured to fulfill the 21st century needs of program participants, ALA respectfully suggests the Commission seek additional comment on and/or actively explore through public convenings the remaining obstacles to broadband adoption for low-income consumers, including additional challenges faced by people with disabilities, low literacy, English as a second language as well as eligible recipients in rural and tribal areas.

Specifically, we suggest the Commission consider the following:

1) Leverage and build on existing infrastructure and resources

Through our digital inclusion work and broad experience with broadband adoption issues, we have found that the most effective community approaches leverage existing infrastructure, such as libraries and digital inclusion organizations rather than create new programs or entities. This is most cost effective and is most sustainable. We encourage the Commission to champion the role these community institutions can and do play in supporting broadband adoption and meaningful use.

- There are over 16,000 public libraries in virtually every community across the country. Libraries already are engaged in digital literacy training and provide free access to computers and the internet—and are the only source of such access in 62% of communities rising to 70% in rural areas.
- Libraries also routinely partner with other community organizations to create robust and relevant programs.

2) Convene stakeholders at the national and state level

As the Commission has recognized, it will take the concerted effort of many stakeholders to fully address the challenges of broadband adoption among low-income consumers. The Commission has convened numerous successful workshops and roundtables bringing together stakeholders for various proceedings. We suggest that the Commission conduct similar events to raise awareness of the broadband adoption challenges; further advance efforts already underway; and spark new or strengthen existing relationships among stakeholder groups. There are numerous interests within the Lifeline community, and the Commission has a powerful role in bringing these voices together and encouraging sustainable private and public funding opportunities to sustain and expand these efforts.

The Commission could use the bully pulpit to continually highlight opportunities enabled through broadband access, as what is relevant in 2016 will evolve over the years. It will be important for technology companies, service providers, foundations, and stakeholder groups to have a platform to adapt strategies to meet the next generation needs.

3) In addition to the work underway at the Commission, other agencies also are meaningfully engaged in broadband adoption issues and are developing strategies to address national challenges

We encourage the Commission to coordinate efforts so that they are not duplicated or counter to one another. For example, the recent work of the Broadband Opportunity Council^v urges coordination among Federal Agencies and Departments to increase broadband deployment and adoption. Another example of a related effort is the Department of Housing and Urban Development's ConnectHome initiative^{vi} to connect residents of public housing, which includes a strong emphasis on addressing the barriers to broadband adoption beyond affordability. Additionally, the National Telecommunications and Information Administration in the Department of Commerce has developed a number of tools and resources that evaluate the broadband adoption efforts of grantees under the Sustainable Broadband Adoption and Public Computer Center grant categories of the Broadband Technology Opportunities Program.

4) Further explore the use of WiFi hotspot devices to bridge gaps in affordable home access

ALA commented during the Lifeline FNPRM proceeding that libraries lend WiFi devices to their patrons and many more are interested in providing that service, particularly to families with school-aged children, but also to low-income patrons. We encourage the Commission to further investigate that as an option within the Lifeline program and respectfully point the Commission to our comments filed in the docket.

Sincerely,

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ⁱ American Library Association 2015 Lifeline comments and ex parte, respectively:

<http://apps.fcc.gov/ecfs/document/view?id=60001223331> and
<http://apps.fcc.gov/ecfs/document/view?id=60001047021>.

See also 2012 Lifeline comments and reply comments, respectively:

<http://apps.fcc.gov/ecfs/document/view?id=7021908401> and
<http://apps.fcc.gov/ecfs/document/view?id=7021915158>.

ⁱⁱ Rhinesmith, Colin. (January 2016) "Digital Inclusion and Meaningful Broadband Adoption Initiatives." Evanston, IL: Benton Foundation, January 2016. benton.org/broadband-inclusion-adoption-report

ⁱⁱⁱ Horrigan, J. (June 2014) "Digital Readiness: Nearly one-third of Americans lack the skills to use next-generation 'Internet of things' applications."

http://jbhorrigan.weebly.com/uploads/3/0/8/0/30809311/digital_readiness.horrigan.june2014.pdf and American Library Association. (December 2015) "After Access: Libraries and Digital Empowerment."

http://www.ala.org/advocacy/sites/ala.org/advocacy/files/content/ALA%20DI%20After%20Access_final_12%2017%2015.pdf.

^{iv} Bertot, J.C., Real, B., Lee, J., McDermott, A.J., & Jaeger, P.T. (2015). *2014 Digital Inclusion Survey: Findings and Results*. College Park, MD: Information Policy & Access Center, University of Maryland College Park. Available at <http://digitalinclusion.umd.edu/>. Figure 26.

^v Broadband Opportunity Council Report and Recommendations (August 2015)

<https://www.ntia.doc.gov/report/2015/broadband-opportunity-council-report-and-recommendations>.

^{vi} ConnectHome <http://connecthome.hud.gov/>