Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Lifeline and Link Up Reform and	)	WC Docket No. 11-42
Modernization	)	
	)	
Lifeline and Link Up	)	WC Docket No. 03-109
	)	
Federal-State Joint Board on Universal	)	CC Docket No. 96-45
Service	)	
	)	
Advancing Broadband Availability Through	)	WC Docket No. 12-23
Digital Literacy Training	)	

COMMENTS OF CONNECTED NATION, INC.

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SUMMARY

Connected Nation, Inc., a national non-profit 501(c)(3) organization working to expand access, adoption, and use of the broadband Internet, strongly supports the Commission's proposal to dedicate and direct universal service funds to support digital literacy and training. Connected Nation estimates that of the approximately 76 million adults that have not adopted broadband at home, approximately 15 million consider their lack of digital skills and knowledge as the main reason why they do not adopt broadband today. A comprehensive, sustained, and effective digital literacy training effort would help bridge this digital skills gap.

Funding for digital literacy training is important and needed, because meeting the nation's and the Commission's broadband priorities **will not be met** simply through the legacy universal service programs that focus solely upon the cost of network infrastructure.

However, while the Commission in the *Further Notice* has properly identified the problem, implementing that vision is another story. The Commission's proposal to prevent institutions that already offer training from receiving funding is misguided. And the Commission's proposal to limit that funding to a rigid, per-institution formula that will barely cover one-half of the cost of training will not effectively solve the nation's digital literacy challenge.

Connected Nation believes that the Commission instead should leverage institutions and practices that are already in place. Getting more community institutions to offer digital training can happen if the federal initiative contributes both funding **and** a commitment to making it less costly for community institutions to offer training. The Commission can have a great effect by focusing its efforts on helping work institutions like U.S. Department of Commerce State Broadband Initiative grant entities and the Institute of Museum and Library Services to develop a

suite of common tools and digital learning options.   This approach would develop and offer a common set of tools and digital training options to states, libraries, community centers, and other groups in a way that would lower the cost and support the introduction of digital learning programs in those communities.

Community institutions like libraries want to serve their patrons, and funding those efforts is important and critical. But the trick to expanding the digital learning opportunities in America is not only to provide adequate funding but to provide it in a way that makes it **cheaper and easier for community institutions to offer digital learning** at the same time.

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COMMENTS OF CONNECTED NATION, INC.

Connected Nation, Inc., a national non-profit 501(c)(3) organization working to expand

the access, adoption, and use broadband Internet technology, offers these comments on the

Commission's proposal to advance and expand digital literacy training, outlined in paragraphs

416-447 in the *Further Notice of Proposed Rulemaking*.[1]

The broadband adoption gap is the single most important challenge that technology

policymakers face today. Connected Nation's research, along with research published by other

organizations, provides us with a measure of the challenge facing us. For instance:

- ◼ 32% of the American households have not adopted broadband at home,[2]

- ◼ Only 37% of low-income minority households with children have broadband at home,[3]

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[1] *See Lifeline and Link Up Reform and Modernization et al.,* Report and Order and Further Notice of Proposed
Rulemaking, WC Dkt. Nos. 11-42 *et al.,* CC Dkt. No. 96-45, FCC 12-11 (rel. Feb. 6, 2012) (*Further Notice*).
[2] NTIA, U.S. Dep't of Commerce, Exploring the Digital Nation: Computer and Internet Use at Home (Nov. 2011),
available at
http://www.ntia.doc.gov/files/ntia/publications/exploring_the_digital_nation_computer_and_internet_use_at_home_
11092011.pdf at 5.

■ 40% of low-income households do not own a computer (compared to only 9% of all others),[4] and

■ 17 million children do not have broadband at home – and 7.6 million of these children live in low-income households.[5]

A lack of digital skills is a significant reason why nearly one-third of the population does not have access to broadband at home. As part of the Department of Commerce, National Telecommunications and Information Administration's State Broadband Initiatives (SBI) grant program, Connected Nation has surveyed adults that do not have broadband in nine states. Our research indicates that 19% of all non-adopters cite a lack of digital knowledge, concerns of complexity, or fear of online risks as the main reason they do not adopt broadband.[6] This research indicates that there are approximately 15 million adults that would cite the digital skills gap as the main barrier to adoption. This is the population that is potentially reachable through aggressive and sustained digital literacy programs.

As a result, Connected Nation strongly supports the Commission's proposal to dedicate and direct universal service funds to support digital literacy and training. Such funding is important and needed, because the broadband priorities of the Commission and the nation **will not be met** simply through the legacy universal service programs that focus solely upon the cost of network infrastructure. Funding for network infrastructure alone might have made sense in the latter portions of dial tone telephone era, when the basics of how to use a telephone were

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[3] Connected Nation, 2011 Residential Technology Assessment Initial Results, *available at:* http://www.connectednation.org/survey-results/residential.

[4] Connected Nation, *The Adoption Gap in Low-Income Households with Children: 2011 Residential Survey Preliminary Findings* (Sep. 2011), *available at:*, http://www.connectednation.org/_documents/connectednationlow-income2011surveyfindingsfinal.pdf. In this case, "low-income" is defined as a household with an annual household income below $25,000.

[5] *Ibid.*

[6] *Ibid* at 4.

relatively simple to absorb. But even in the early years of the Bell System through the 1950's, the regulated Bell System regularly invested resources in training individuals in how to use the telephone.[7] Just as it was legitimate to ask Bell System ratepayers to pay for movies on how to dial a telephone, there is a legitimate place for the Universal Service Fund to pay for digital training programs that would expand the adoption and use of broadband technology. In costly areas to serve, solving the broadband adoption gap will advance the transformation of the Universal Service Fund program because greater adoption will spur demand for these networks and improve the business case for deployment. Simply put, higher broadband adoption rates will decrease the supply-side network subsidies that will be needed to ensure that all Americans have adequate access to broadband.

Digital literacy is also important to economic growth and recovery. With one-third of Americans not fully utilizing broadband technology, the ability of broadband technology to be the engine of economic and social growth in the United States is severely limited. Moreover, today's broadband gap may become an economic opportunity chasm in the very near future – with education, healthcare, government services, and job skills increasingly moving online, Americans without digital skills will fall increasingly behind. The emergence of a disconnected Internet Underclass could slam the brakes on economic recovery, job growth, and social development.

However, while the Commission in the *Further Notice* has properly identified the problem, implementing that vision is another story. The Commission's proposal to limit funding

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[7] *See, e.g.,* "How to Use the Dial Phone" (1927), posted on YouTube, http://www.youtube.com/watch?v=Et_u7JLoUjY&feature=related (last visited Apr. 2, 2012); AT&T Archives, "Now You Can Dial" (1954), available at http://techchannel.att.com/play-video.cfm/2011/6/3/AT&T-Archives-Now-You-Can-Dial (last visited Apr. 2, 2012).

only to institutions that do not currently offer training today will miss key opportunities to close the digital skills gap. In addition, the Commission's proposed funding levels of $15,000 annually per institution for 8-10 hours of formal training per week dramatically underestimates the cost of offering training.

In these Comments, Connected Nation outlines a different strategy for a national digital literacy initiative. The strategy that Connected Nation has employed to bridge the digital skills gap is cost-effective, because it lowers the costs of offering training solutions and still relies upon local implementation and variation. Incorporating this approach along with funding would offer a common set of tools and digital training options to states, libraries, community centers, and other groups that would lower costs and support their offering of digital learning programs in their community. These institutions want to serve their customers, and funding is important and critical. But the trick to expanding the digital learning opportunities in America is not only to provide funding but to provide it in a way that makes it **cheaper and easier for community institutions to offer digital learning** at the same time.

I.   CONNECTED NATION'S DIGITAL LEARNING INITIATIVES

Connected Nation, Inc., a non-profit corporation, is working with hundreds of anchor institutions, community leaders, states, local governments, and citizens across the country to expand the reach, adoption, and use of broadband technology. Digital literacy and technology outreach projects have indeed been at the heart of Connected Nation's mission since its founding. From the introductory "Computers 4 Kids" program it inaugurated in Kentucky and Tennessee in 2004, to working with state library associations to organize and host state broadband summits and convenings in conjunction with the Bill and Melinda Gates Foundation,

Connected Nation has been at the forefront of closing broadband access, adoption, and utilization gaps in the United States. Through the Department of Commerce, National Telecommunications and Information Administration's State Broadband Initiatives (SBI) grant program, Connected Nation's non-profit subsidiaries are currently organizing and leading broadband initiatives in eight states and the Territory of Puerto Rico.[8]

Connected Nation has built digital literacy programs that integrate connectivity, devices, and training from the ground up, and it has targeted its initiatives on the basis of sound empirical research. Connected Nation begun by working directly with state governments in attempting to solve the issue of the availability and adoption of broadband in the mostly rural areas of Kentucky, and later Tennessee and Ohio.

With this mandate, Connected Nation quickly learned that bridging the "broadband access gap" involved far more than last-mile, network construction initiatives. Research in these communities and work with community leaders demonstrated that the problem of *access* to broadband technology in rural, unserved areas was not simply a question of cost but also, and even more importantly, a question of adoption and use of that technology in those communities. Years before the National Broadband Plan and the proposals for the Connect America Fund were written, Connected Nation recognized that the business case for broadband investment in low-income, low population areas was simply not present without vibrant programs designed to increase the adoption and use of broadband in those communities. The success of these programs depends upon there being active and engaged local champions and institutions, and a large part of Connected Nation's work still focuses upon developing tools and applications that

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[8] For a list of SBI institutions, *see* U.S. Dep't of Commerce, National Telecommunications & Information Administration, *State Broadband Initiative,* http://www2.ntia.doc.gov/SBDD.

empower and make it easier for these local community institutions to deploy digital learning initiatives in their own community.

Connected Nation has built this point of view into each of our digital learning and outreach programs:

Every Citizen Online is Connected Nation's signature program in Ohio. Every Citizen Online is a public-private partnership that supports the offering of free computer and broadband training classes in more than 265 library, community college, workforce development, and community center locations across the state of Ohio. Connected Nation's subsidiary Connect Ohio developed and administers the program on a statewide basis. The program consists of three parts:

- **Institutional Support.** The program first recruited community training partners – most often libraries and community colleges, but also nonprofit organizations like Goodwill – and provided them basic infrastructure to offer digital literacy training. For some partners, this included outfitting computer labs in communities.

- **Media Outreach.** Connect Ohio established a statewide media campaign to raise awareness of the program. This initiative has involved broadcast radio and television advertisements, contests, and both earned and purchased media.

- **Trainer Recruitment and Classroom Support.** Connect Ohio recruits and compensates trainers and provides them with basic curricula materials. Connect Ohio also manages the schedule of these training options, manages classroom attendance and size, builds and supports curricula, tracks attendance, and surveys trainees.

The program received a Sustainable Broadband Adoption grant from the National Telecommunications and Information Administration of $6.9 million and matching funds from a number of entities, including the state of Ohio and technology firms. Of the grant funds, $1.3 million were invested in upgrading the computers at training centers, and $5.6 million are being spent on expanding available training programs across these institutions. The program includes a

significant public awareness campaign that reached an average of 44.5 million households per month through the broadcast of public service announcements in 2011 ("Life is Better with Broadband").

With this funding, the program will provide 80,000 in-person training hours and will include online, self-guided training curricula. The goal of the program is to train 200,000 Ohioans in computer and broadband skills, through a free six-hour training program hosted at local library, community college, workforce development, and community center sites. Launched in January 2011, the goal is to convert 75,000 of these trainees into broadband adopters.

Computers 4 Kids (previously known as No Child Left Offline). Computers 4 Kids began in 2005 as a computer refurbishing program that was developed as part of Kentucky's *Prescription for Innovation,* a comprehensive effort by the state government to drive economic development through broadband. The partnership between Kentucky's Finance and Administration Cabinet, Kentucky Correctional Industries, and ConnectKentucky (Connected Nation's original program) refurbished state surplus computers and placed them in the homes of families on the free and reduced school lunch program. The program ensured that thousands of state computers were saved from landfills and refurbished for the benefit of families. This program has since expanded to include distribution of computers to community anchor institutions that provide services to vulnerable populations such as community centers, Boys & Girls Clubs, YMCAs, and libraries.

Connected Nation has expanded its Computers 4 Kids program into Tennessee, now fueled by a $2.3 million Sustainable Broadband Adoption grant from the NTIA. This program deploys computers, academic support programs, and workforce training to two important and

especially at-risk populations: children about to "age out" of the state foster care system as they

turn 18, and youth who are active in the state's 76 Boys & Girls clubs. Over the next three years,

the program will impact the lives of nearly 60,000 youth across the state. The program is a

collaboration between Connected Nation's Connected Tennessee program, the Boys & Girls

Clubs of Tennessee, and the state Department of Children's Services. The program arm these

vulnerable youth with laptops and training in order to prepare them to enter the workforce or

college.[9]

Connect Equestrian View is a two-year digital literacy training project that Connected

Nation launched in a federally-subsidized low-income housing development in Lexington,

Kentucky in January 2010. The project equips new residents in the Hope VI Equestrian View

neighborhood with technological resources and provides them with technology training.

Connected Nation works with the Lexington Housing Authority, the Lexington Public Library,

and the William Wells Community Center to develop technology inclusion programs for

residents. The program combines a new laptop, up to 24 months of broadband connectivity, and

an extensive digital literacy training program. This training includes basic computer set-up and

operation as well as advanced training courses in areas including cybersecurity, social

networking, cybersafety, e-business development, teleworking, and advanced use of Microsoft

Office Suite applications.

II. FACILITATING DIGITAL LEARNING SUCCESS: LESSONS LEARNED FROM CONNECTED NATION'S DIGITAL LEARNING PROGRAMS

All of Connected Nation's digital learning programs share a common, basic vision –

digital literacy training is important to broadband adoption, and the key to increasing digital

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[9] *See* http://www.connectedtn.org/recipients.

literacy training options for consumers is to make it **easier** and **less expensive** for community institutions to offer that training. Without exception, the leaders of these libraries and community institutions want to serve their communities. These community leaders know intimately how technology will drive the future of their children and towns. Many libraries and community institutions already provide digital learning programs to their patrons, but many do not or on a limited basis, due to a lack of funding and readily available tools and knowledge on how to implement such a program.[10]

Stated simply, when combined with adequate funding, if it can be made easier and less expensive for community institutions to offer training, more will. Connected Nation has built its digital learning projects and initiatives around this concept – that if given the right tools and capacity, local community institutions and leaders will take responsibility and can manage tremendous change in their communities.

For example, consider Perry County, Tennessee. In January 2009, the unemployment rate in this small county with a population of 7,900 was 27%, the third highest in the country. That summer, Connected Nation, along with technology and broadband firms, the local government, and the South Central Tennessee Workforce Alliance helped build and create a "Digital Factory." The Perry County Digital Factory a fully-equipped work center that offers digital skills training, job placement, and work space. And in the two years since it opened, it

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[10] For a comprehensive discussion of the funding and technology challenges that public libraries face in particular, *see* American Library Association, *Libraries Connect Communities: Public Library Funding & Technology Access Study 2010-2011: Public Library Technology Study: Final 2010-2011 Report,* at 24-25, *available at:* http://www.ala.org/research/initiatives/plftas/2010_2011#final%20report. These challenges are faced by institutions that have a tradition of offering technology services to their patrons – consider the daunting challenge that an enterprise like a Goodwill or a community center faces when it is at "square one" in offering training options.

has prepared its trainees for technology jobs, and the unemployment rate in the county has gone down to 17%.[11]

Imagine, though, the "to do" list that community leaders or institutions face when they decide to offer digital literacy training. Important functions like equipping a center to support a class, recruiting and managing trainers, arranging class schedules, managing class enrollment, planning and arranging for access to curricula, and outreach and advertising of class offerings – all of these steps need to happen successfully for a program to succeed.

Helping community leaders and institutions with this "to do" list is an important part of what Connected Nation's digital learning and state programs do. Arranging for technology partners to sponsor and build a digital learning lab, ordering and installing computers, recruiting trainers, establishing and local outreach and awareness campaign, and developing localized curricula – these are the program administration gaps that Connected Nation's programs fill. Based on our own experience in Ohio, Tennessee, and Kentucky, Connected Nation has found that many of these functions and tools can be reasonably centralized quite effectively. And when resources like those are available, community institutions are eager to, and will, begin to develop their own solutions and programs for their communities.

Connected Nation respectfully suggests that as the Commission invests in digital learning solutions, it keep these lessons in mind. Funding is certainly needed, but thinking of digital literacy funding solely as an investment of $15,000 per year per institution (as the *Further Notice* proposes) alone will only solve part of the funding gap. That funding alone will **not** make it easier for those institutions to actually offer effective digital literacy training programs (and

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[11] Connected Tennessee, "Perry County: Two Years Later," *Connected: Computer 4 Kids Quarterly (Fall 2011); see also* http://www.youtube.com/user/connectednation#p/a/EDCD28619970905/1/Y6Fqdb1r9Js.

depending on how implemented, may even introduce additional headaches). Therefore, while Connected Nation strongly supports the Commission's objective, it suggests that the Commission also consider incorporating into its program support for institutions and initiatives that can coordinate these common functions in a way that leverages work already being undertaken today. In particular, the NTIA has established technical assistance and capacity-building programs in every state and territory through the State Broadband Initiatives grant program. In addition, as suggested by the American Library Association, the Institute of Museum and Library Services also serves an important capacity-building role for such community institutions. To the maximum extent possible, the Commission's digital literacy funding effort should be done in concert with and subject to the direction and guidance of those institutions.

III.   COMMENTS ON THE *NOTICE OF PROPOSED RULEMAKING*

In this Section, Connected Nation provides its comment on specific questions raised by the Commission in the *Further Notice.*

A. Digital Literacy Training Works and Can Close the Broadband Adoption Gap

Connected Nation estimates that for 15 million adults, a lack of digital skills is the main barrier to home broadband adoption.[12] Further, another 11 million adults, or 14% of all non-adopters, cite a lack of relevance or awareness as the main reason they do not adopt.[13] And for the millions of other adults in which cost and access might be the main barrier, a lack of digital

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[12] *Supra* n. 6 and accompanying text.

[13] Connected Nation, *The Adoption Gap in Low-Income Households with Children: 2011 Residential Survey Preliminary Findings* (Sep. 2011), *available at:*, http://www.connectednation.org/_documents/connectednationlow-income2011surveyfindingsfinal.pdf at 4 (reporting that 14% of non-adopting adults do not adopt due to relevance concerns, which translated to the estimated population of non-adopters is approximately 11 million).

skills or concerns over fraud and online risks remain common. An effective digital learning and

outreach program can bridge these digital skill gaps, and turn many of these adults into active,

broadband adopters.

As the Commission noted in the *Further Notice,* in-person digital literacy training can be

a very effective means of converting computer and technology neophytes into broadband

adopters. Connected Nation's Every Citizen Online project in Ohio demonstrates the real,

tangible value that digital literacy training offers consumers, especially those seeking to improve

their job skills. As an example, one Gahanna, Ohio, library patron, a nurse, completed Every

Citizen Online training after losing her job due to a lack of sufficient job skills. The hospital

where she worked had upgraded to an electronic records system and began to require employees

to have online-literacy knowledge and skills. "I was able to get away with limited computer

knowledge for years," she said. But when she was asked to use unfamiliar applications at work,

"there was no one I could turn to for computer help." The training offered by her employer

bypassed the basic computer skills she needed. As a result of training at her local library, she

now has basic knowledge and is re-entering the work force.[14]

Connect Ohio also offers training in conjunction with the Goodwill Columbus'

Workforce Development program. Each year, this program helps hundreds of adults obtain

gainful employment. One recent trainee who had lost her job due to a lack of computer skills

took a class offered by Goodwill Columbus and noted, "I need computer skills. I'm here to learn

Word, to cut and paste to make a résumé, and to e-mail. This [class] is a great resource." The

Connect Ohio Every Citizen Online program also offers solutions to seniors, in partnership with

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[14] *For more information, see* http://connectohio.org/blog/post/columbus-library-patrons-connect-family-learn-job-skills-through-eco-training.

Tech Wise and the Lake Counsel on Aging. These classes focus on bridging the barriers to senior broadband adoption.[15]

B. To Maximize Effectiveness, Funding Should be Coordinated and Use a Suite of Tools and Training Options -- Funding for Digital Literacy Should Not Be Limited to Entities that Do Not Offer Training Today, as the Commission Proposes

Connected Nation believes that the Commission's digital literacy training effort should be coordinated with existing institutions and programs, and focus on building a suite of tools and training options that would lower the cost of offering and expanding training options. As a result, Connected Nation believes that that Commission's proposal in paragraph 430 to limit funding to entities that do not already offer formal digital literacy training today is a wrongheaded approach and would virtually guarantee that the Commission's initiative will result in an unnecessary duplication of effort and work.

Limiting funding to entities that do not offer formal training today will miss a significant opportunity to close the digital skills gap. For example, the Columbus (Ohio) Metropolitan Library hosts ECO training at nine of its twenty-one locations. That program is a well-coordinated strategy that it developed working with Connect Ohio. It would be reasonable and even efficient to think, however, of expanding that program to the other twelve library locations in Columbus that do not offer ECO training today. Expansion of the number of locations in Columbus may be an effective and efficient use of digital literacy funding, yet the Commission's

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[15] *For more information, see* http://connectohio.org/blog/post/connecting-seniors-through-every-citizen-online.

proposal would forego this option entirely. Stated simply, if it imposes this rule, the

Commission may fall well-short of its goal to have 60% of library locations offer digital training.

In addition, the Commission's proposal invites questions about what a "formal" digital

literacy program is and fails to recognize that digital literacy training can encompass both formal

and informal approaches. Many libraries, for example, offer "point of need" training, outside the

context of a formal class. This approach, which might include a short discussion with a patron

and a particular curriculum guide or self-training module, can be employed at the most effective

time – when a patron at the library and asking for help. And for smaller institutions that may not

have enough patrons to warrant a formal classroom, informal point of need training may be the

most cost effective method of offering training in areas such as online job hunting.

Tools can be developed to support point of need training, and such training may

eventually lead to more intensive, formal training of the patron. However, would a library

program that includes offering a patron self-guided curricula with "office hours" of the library IT

professional qualify as "formal digital literacy" training? Tying funding to the lack of any

training program that could be regarded as "formal" would discourage community institutions

from developing creative and efficient solutions such as "point of need" training.

Rather than raise the cost of offering training, the Commission should be working to

lower the cost and ease the administration of training programs of all stripes. The Commission's

proposal to limit funds to entities that do not offer formal training today seems derived from a

desire to avoid duplication of funding and effort. This goal can be achieved in a much more

effective way – by ensuring that funding efforts be coordinated in a way that avoids unnecessary

duplication. As discussed above, the Connect Ohio Every Citizen Online program avoids

unnecessary duplication by centralizing certain core functions like trainer recruitment, curricula

development, outreach campaigns, and course attendance and research. As a result of this

coordination and centralization of common functions, small institutions across the state – not

only libraries but Goodwill centers, senior centers, and Boys & Girls Clubs – can now offer

training to their patrons. By centralizing functions like outreach, classroom schedules, and

trainer recruitment that make sense to be centralized, this approach maximizes the use of funding

and allows smaller institutions to offer a wide range of training options on a cost-effective basis.

Building this common suite of tools and training options is a nuanced task. Connected

Nation suggests that existing State Broadband Initiative programs and the Institute of Museum

and Library Services can fill this coordinating role and employ strategies that would maximize

the effectiveness of a digital learning initiative. The Commission should actively work with

those institutions to develop a set of tools and approaches that will lower the cost of training

courses and avoid unnecessary duplication. Developing a comprehensive suite of training

options and tools would be the most effective and efficient means of bridging the digital skills

gap.

C. The Commission has Dramatically Underestimated the Cost of Digital Literacy Training

The Commission in paragraphs 439-440 of the *Further Notice* asks whether $15,000 per

entity per year would be adequate for an entity to provide 8-10 hours of formal training per

week. As noted above, Connected Nation believes that a singular focus upon formal training

will not solve the digital skills gap that the nation faces. That said, the Commission has

dramatically underestimated the cost of offering digital literacy training, which can be twice

what the Commission believes.

The Commission's proposal would invest approximately $28-38 per hour of formal training. By contrast, Connect Ohio's Every Citizen Online program – which offers training in both urban and rural areas – costs approximately $70 for each hour of in-person training, a figure that we believe is commensurate with the training costs of other institutions.[16] It is possible that the Commission's proposed per-hour cost likely would not even cover the hourly cost of the trainer. Therefore, while in paragraph 436 of the *Further Notice* the Commission has identified many of the important components that an effective digital literacy training program must contain, the Commission does not seem to have taken the cost of all of these factors into account. Completely missing from the Commission's cost estimate are materials for students, the cost of the meeting room or facility, curriculum development, trainer recruitment and training, classroom and schedule administration (attendance and scheduling), let alone any publicity or outreach that the institution would do regarding the course.

These other program costs must be taken into account. As the American Library Association's *Public Library Funding & Technology Access Study* pointed out:

> The increased use of services, combined with insufficient funding, is a continuing strain on libraries trying to maintain and improve technology services… Public libraries continue to hold stable and, in some cases, increase their public access Internet services, resources and infrastructure. The survey shows, however, that libraries' ability to do so is waning.[17]

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[16] The Every Citizen Online program in Ohio has a budget for digital literacy training of $5.6 million, out of which it will provide 80,000 hours of in-person training at over 200 different locations. These program costs includes the cost of a trainer, instructor and trainee materials, curriculum development, class scheduling and tracking.

[17] American Library Association, *Libraries Connect Communities: Public Library Funding & Technology Access Study 2010-2011: Public Library Technology Study: Final 2010-2011 Report,* at 24-25, *available at:* http://www.ala.org/research/initiatives/plftas/2010_2011#final%20report.

The ALA study describes recent setbacks in staffing, operating hours, and longer technology replacement schedules that public libraries are facing. Funding for digital literacy can help solve those problems if it is deployed in a smart, effective, and coordinated manner.

Unfortunately, a focus placed solely upon the incremental cost of offering training – without regard to all of the other software, curricula, administrative, and outreach costs involved – would not relieve that pressure. Moreover, by placing the focus solely on the cost per hour of training, and not the cost per trainee, the Commission would have no way to track success or measure the cost-effectiveness of the training that it would fund.

Connected Nation believes that an approach that includes all costs involved in offering digital literacy training would be a far more appropriate. Some of these costs are incremental to the number of classes that are hosted, but some other aspects of the cost are relatively fixed, regardless of how much training is offered. Many of these common costs can be shared among institutions, such as media and outreach strategy, curriculum and software development, trainer recruitment, class scheduling and attendance tracking, and call center operations. The value of Connect Ohio's Every Citizen Online is that it centralizes these functions for libraries and other community institutions. And when that happens, even very small community centers can take advantage and begin to offer digital literacy training to their patrons.

Without further coordination, the Commission's proposal to provide $15,000 silos of funding to institutions may miss these opportunities. At best, the proposed approach risks duplicating common functions; at worst, the proposed approach could even discourage institutions from offering training if the institution has reason to believe that its true costs will exceed $15,000 per year. Because the costs involved in digital literacy training are higher than the Commission's estimate, it is imperative that the Commission work direct with the SBI

programs that are already functioning in states and the IMLS in order to coordinate this effort. Connected Nation believes that targeting investment into develop a suite of common administrative tools and functions and digital learning options – which then would be made available to all institutions to adapt to their training programs – would be an efficient and effective means of recruiting and empowering local institutions.

IV. CONCLUSION

Connected Nation strongly supports the Commission's proposal to invest universal service funds to help solve the digital skills gap. Connected Nation estimates that there are approximately 15 million adults in America today that cite a lack of digital skills and knowledge as the main reason why they do not adopt broadband. A comprehensive, sustained, and effective digital literacy training effort would help bridge this digital skills gap.

However, the Commission's proposal to prevent institutions that already offer training from receiving funding, and to limit that funding to a rigid, per-institution formula that will barely cover one-half of the cost of training, will not effectively solve the nation's digital literacy challenge.

Connected Nation believes that the Commission instead should incorporate both adequate funding for digital training **and** a commitment to making it less costly for community institutions to offer that training. The Commission should leverage the work already undertaken and help institutions like U.S. Department of Commerce State Broadband Initiative grant entities and IMLS develop a suite of common tools and digital learning options. This common set of tools and digital training options would lower the cost and support the introduction of digital learning programs by states, libraries, community centers, and other groups.

Community institutions like libraries want to serve their patrons, and funding those

efforts is important and critical. But the trick to expanding the digital learning opportunities in

America is not only to provide adequate funding but to provide it in a way that makes it **cheaper**

and easier for community institutions to offer digital learning at the same time.

Respectfully submitted,

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