

**Before the  
Federal Communications Commission  
Washington, DC 20554**

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

**COMMENTS OF THE NATIONAL ASSOCIATION OF  
TELECOMMUNICATIONS OFFICERS AND ADVISORS AND THE NATIONAL  
ASSOCIATION OF COUNTIES**

**I. INTRODUCTION**

The National Association of Telecommunications Officers and Advisors (“NATOA”)<sup>1</sup> and the National Association of Counties (“NACo”)<sup>2</sup> submit these comments in response to the

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<sup>1</sup> NATOA’s membership includes local government officials and staff members from across the nation whose responsibility is to develop and administer communications policy and the provision of such services for the nation’s local governments.

<sup>2</sup> NACo represents county governments, and provides essential services to the nation’s 3,068 counties.

Further Notice of Proposed Rulemaking (“FNPRM”), released February 6, 2012, in the above-entitled proceedings.

## **II. COMMENTERS’ INTEREST**

The economic, educational, health, and social benefits that broadband can bring to local communities cannot be overstated. For years, local governments have worked to support increased broadband deployment through cable franchising agreements, tower facility siting policies, and public safety communications infrastructure installations. But ensuring that affordable broadband is available to all parts of our country is just one piece of the puzzle. Deployment without widespread adoption only contributes to the digital divide we continue to experience in our nation, especially in our economically challenged communities. As the Commission points out, “the percentage of non-adopters among low-income Americans may be as much as double the national rate [of approximately 32 percent].”<sup>3</sup>

For this reason, we strongly support the Commission’s initiatives to “tackle the digital literacy challenge” and we urge the Commission to make “use of universal service funding to address the barriers that lack of digital literacy creates to increased broadband adoption among low-income Americans.”<sup>4</sup>

## **III. ARGUMENT**

In the FNPRM, the Commission contemplates using funds freed up by Lifeline/Link Up reform to support digital inclusion programs. We commend the Commission for taking this funding approach. Coupled with the actual subsidy money under the Low Income program, this funding could have an extraordinarily powerful impact on the communities that are intended to benefit from it.

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<sup>3</sup> Cite to FNPRM at 416.

<sup>4</sup> Id.

The Commission further envisions allocating the funding to libraries, and using the E-Rate mechanism to distribute the funding. While we commend the Commission for its vision, we propose that by considering this program more broadly, the Commission could dramatically expand its efficacy and impact.

**A. Digital Literacy Center Locations Must Take Into Account Local Community Factors**

Local governments have been working on digital inclusion programs for over a decade, and we are very enthusiastic both to have the FCC as a partner in this endeavor, and for the newfound recognition over the past few years for programs that speak to educating Americans—particularly seniors and low-income citizens—who have not previously had the benefit of this technology. Digital literacy programs will give these citizens not just support, but an understanding of how the Internet (and the resources available through it) can be transformative in their lives.

Virtually every local government in the United States already conducts, operates, or supports some kind of digital literacy programming, whether in their libraries, senior centers, public housing complexes, Head Start program facilities, community colleges, K-12 schools, city halls, post offices, and community media centers. As this long and varied list illustrates, the center of community education is different in every community. In each community, the facility that is best suited to such activities must be tailored to local geography and cultural factors.

In many of those communities, that place is going to be a library—but not always. And all of those facilities, if they can demonstrate the local need and their capability of delivering the services, should be allowed to apply for competitive funding.

## **B. Digital Literacy Programs Belong in Many Locations, Not Just Libraries**

Seniors may be the least digitally literate demographic in the United States—yet as a group, they have an enormous stake in digital literacy. Local governments are extremely concerned about ensuring that seniors have this kind of access and training. Thus, it is extremely important to make digital literacy training available to seniors where they are most able to access it. For example, a library may be a very logical place to go for training for many citizens, but not for seniors who do not have easy access to a library, whether because they lack mobility, spend their days in senior centers, or live in senior homes. Accordingly, senior centers and senior housing are essential locations for digital literacy programs.

Furthermore, it is incredibly costly and difficult for seniors to get information about healthcare. And while the Internet is a treasure trove of high quality, free (or very low cost) information about healthcare, many seniors do not realize that this resource is available to them. The healthcare mechanism could be the lever that gets seniors to learn how to use the Internet, because of the free availability of information that is vital to them. This scenario also illustrates the importance of digital literacy, because seniors who are new to the Internet must learn how to differentiate among websites that provide high-quality medical information and those that are inaccurate or, worse, trying to sell them something.

Another important population to consider in terms of the location of digital literacy programs are low-income Americans. There is no coincidence that public computer centers are now more common in low-income housing centers; this scenario is based on an award-winning model that was pioneered by the City of San Francisco over many years. By siting a public computer center in a low-income housing unit, a community can enable, as one example, parents

who are motivated to have a better understanding of what their children are doing in school. These parents would have much easier access to digital literacy training—as could their children.

Indeed, while many low-income Americans use libraries, it is not necessarily the case that there is a culture of library use among low-income Americans everywhere. But other facilities that provide services to low-income Americans, including, for example, homeless shelters or soup kitchens, could be very important recipients of funding and providers of services. The Obama administration has noted on countless occasions how important the Internet is for job searching. Surely the means of the job search and all other educational elements of the Internet should be available in places where low-income Americans already go for services—not only in places where ideally we would want them to go.

We thus strongly urge the Commission to make the program available to a broader set of locations because of the importance of customizing a program to meet the needs of the local community (i.e., in determining the most logical place for services to be delivered). The beauty of localism and local decision-making is that, in any community, the community is best able to make the decision as to what the logical locations are for this kind of training and support.

In a huge number of communities, the libraries may be where training will take place. But we ask that the Commission not limit the program to libraries because not all communities are the same. Indeed, the National Telecommunications and Information Administration (NTIA) awarded Public Computer Center (PCC) and Sustainable Broadband Adoption (SBA) grants to entities as varied as fire departments because, in some rural communities, the fire house turned out to be the most centrally located facility and the most logically suited to providing these services.

### **C. The NTIA, Not USAC, Should Manage the Program Funding**

NTIA's experience and unique expertise in this area is something we strongly commend to the Commission. Communities throughout the country have recognized the heroic efforts that NTIA have made in the Broadband Technology Opportunities Program (BTOP) era. NTIA has overseen an incredibly complex and fast-moving program that required significant federal dollars to be spent efficiently, appropriately, and quickly. It has done this work well, and has developed deep expertise in-house.

NTIA, to its credit, has also leveraged the experience of the Technology Opportunities Program (TOP), which was a Clinton-era program aimed at the same kind of goals as the FCC is considering here. TOP was defunded in the George W. Bush administration, but the best practices that were developed served as part of the basis for BTOP.

Put another way, NTIA has nearly two decades of experience and expertise in this field. It should absolutely be an important part of the program that the FCC contemplates. We ask that the FCC leverage the NTIA's expertise in this regard rather than try to re-create it elsewhere.

We understand that there may be statutory limitations, but the program that the Commission creates out of this rulemaking will ideally leverage NTIA's capabilities and even enable NTIA to replicate its important and impressive BTOP achievement in implementing SBA and PCC programs. NTIA essentially has those kinds of programs down to a science and, through its experiences, has developed an efficient and fair federal grant program. We hope to see that continued, rather than the Commission seeking to replace and replicate all that learning at another institution.

In addition, leveraging NTIA's BTOP experience would have the added benefit of leveraging all of the federal government's stimulus spending on broadband, which has been a

clear policy priority of the Obama administration. Such a move would illustrate that the Recovery Act broadband programs have had benefits not only through their immediate job-creating impact, but in terms of creating new approaches and new learning best practices, and in pointing the way to a broadband future that the FCC can now join. In this way, if the Commission creates a program that leverages NTIA's experience, there will be exponential benefits from that initial BTOP funding that will accrue over time far out of proportion to the simple dollar figure represented here.

For all of these reasons, we urge the Commission to find mechanisms to leverage NTIA's capabilities rather than saddling USAC with this new set of responsibilities. USAC has traditionally been very focused on certain kinds of quantitative measurements and evaluations, and ably fulfilled its mission—to its great credit. USAC's experience with these quantitative programs, particularly the Schools and Libraries E-Rate program, however, may not necessarily translate to digital literacy programs in the same way that NTIA BTOP experience does. In fact, quite the contrary. We would hate to see USAC's mission of getting affordable broadband to schools and libraries diluted in any way. We are also frankly not sure that the correct expertise currently resides in USAC for a digital literacy program.

**D. Digital Literacy and E-Rate Must Have Separate Missions and Funding**

There is another reason why we feel it would be inappropriate to blur the lines between the E-Rate program and this digital literacy program: our long-term concern about risks to the E-Rate program's funds and mission. As the American Library Association (ALA) noted in its comments in this proceeding, we are deeply concerned about any risk to E-Rate, which in its current form is already insufficient to fund the full range of connectivity needs of America's schools and libraries.

We strongly urge that the Commission not create any risk of blurring the lines between E-Rate funds and programs, and the new digital literacy program, which must not under any circumstances be funded from E-Rate funds. It would be a tragic outcome of this proceeding if, now or in the future, the E-Rate wall was breached and the core goals of E-Rate were sacrificed, even in small part, through re-allocation of E-Rate funds to digital literacy. These two programs—connectivity on one hand, literacy on the other—should never have to compete for funds. They are equally essential, though very different in nature. They should be funded separately, with no risk of comingling or dilution of funding for either.

#### **IV. CONCLUSION**

We strongly support the Commission's goal to increase digital literacy and, in turn, narrow the digital divide. But we believe any funding program must provide eligibility for a wide variety of training sites, not just schools and libraries. Further, we urge that any new program include the participation of the NTIA and make use of its knowledge and experience in managing competitive grant programs.

Local governments stand ready to assist the Commission as it proceeds with its efforts to bring the benefits of broadband to all Americans.

Respectfully submitted,



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