



National Digital Inclusion Alliance
3000 E Main St #50
Columbus, OH 43209

August 25, 2023

Esteemed members of the Senate Universal Service Fund Working Group, the National Digital Inclusion Alliance (NDIA) respectfully submits these comments to the Working Group as you consider the Universal Service Fund (USF)'s future.

NDIA prioritizes equity. This means we support digital inclusion work that prioritizes people who have been left behind by the digital divide. NDIA bridges the community of digital inclusion practitioners and policymakers, serving as a unified voice advocating for broadband access, devices, digital skills training, and tech support. Working collaboratively, NDIA identifies, crafts, and disseminates resources and tools to help community-based digital inclusion programs increase their impact with populations who have been left behind. While universal, the digital divide disproportionately impacts disadvantaged communities and individuals, particularly people of color and people experiencing poverty. Today, NDIA has more than 1,400 affiliates including 23 Tribal entities, and a variety of organizations in all 50 states, the District of Columbia, American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, and the US Virgin Islands serve these populations. The work and insight of these affiliates inform the following recommendations.

A National Digital Equity Plan should measure the effectiveness of USF

As part of the [Digital Equity Act](#) (codified by the Infrastructure Investment and Jobs Act), Congress requires each state, the District of Columbia, and the territories to create a Digital Equity Plan¹. This was a good idea, and we commend Congress for rightly acknowledging the importance of community-driven planning. The plans will provide the groundwork for understanding the current landscape; developing equitable, robust digital inclusion ecosystems; and providing a roadmap for achieving digital equity nationwide.

Likewise, Congress should mandate the creation of a National Digital Equity Plan. The effectiveness of USF programs could then be measured against the National Digital Equity Plan's goals. This plan could and should be influenced by and aligned with the digital equity plans the states, territories, and the District of Columbia are currently creating--and the plans Tribal entities will eventually create--through the Digital Equity Act.

We must plan for the future. Technology will continue changing, and how we use it will too. We need to consider these realities as we assess the effectiveness of USF. A National Digital Equity Plan should provide a plan for sustainability to account for this continuous change, guiding the

¹ Infrastructure Investment and Jobs Act, 47 USC § 1702 (2021).

systems-level changes that are essential to the United States' future ability to compete globally. To do this, every community across the United States should have a digital inclusion ecosystem, and the National Digital Equity Plan should outline a strategy to ensure this outcome.

A digital inclusion ecosystem is a combination of programs and policies that meets a geographic community's unique and diverse needs. A strong digital inclusion ecosystem is coordinated and integrates programs and policies addressing all aspects of the digital divide, starting with affordable broadband, devices, and skills, and including:

- Affordable and subsidized broadband service options that meet the community's needs
- Affordable and subsidized device ownership programs that meet the community's needs
- Multilingual digital literacy and digital skills training that meet the community's needs
- Hardware and software technical support
- Digital navigation services to guide residents to the above services
- Collaboration among entities providing local digital inclusion services, policymakers, advocates, social service providers, and community leaders, who come together to co-create solutions in partnership with the community

The Affordable Connectivity Program and Lifeline should both be funded through USF

The Affordable Connectivity Program (ACP) should be aligned with the Lifeline program. Modern communication requires access to voice, text, and data.

Although the universal service goals must account for evolving communications technology, the Commission must continue to support core communications services, such as voice and text. These services should not be phased out. Traditional phone service (voice) remains critical for access to emergency services, work activities, and social connection.² Text capabilities remain essential for people living with speech barriers.

Both mobile and in-home broadband services are essential to everyday modern life. For example, two-factor authentication is a common method for reducing fraud and typically requires both internet access and a texting service. As Congress noted in the Digital Equity Act, we must ensure vulnerable populations (or covered populations as defined in the DEA) have the necessary skills and information to secure their privacy and protect themselves online.

ACP addresses one of the main barriers to broadband adoption³ – cost – and helps make broadband more affordable for over 20 million households in both rural and urban communities⁴. The success of the federal broadband investments, including BEAD (Broadband

² Broadband Connects America, *In the Matter of Report on the Future of the Universal Service Fund*, February 17, 2022.

³ Broadband adoption is sustained access to robust broadband service that meets the needs of the entire household. This means the ability to subscribe to broadband plans that can serve everyone in the house—not just through an individual's mobile phone—and provide the speeds that support a variety of online activities.

⁴ See "ACP Enrollment and Claims Tracker", Universal Service Administrative Company, accessed May 7, 2023, <https://www.usac.org/about/affordable-connectivity-program/acp-enrollment-and-claims-tracker/>

Equity Access and Deployment) and the Capital Project Fund (CPF) programs, are inextricably linked to the continuation of the ACP program. ACP improves the business case for investing in rural areas,⁵ reduces broadband service cancellations, and increases the likelihood that service providers will achieve a reliable return on investment from networks deployed through BEAD.⁶

Congress should ensure bridge funding for ACP

NDIA's estimate aligns with widespread expectation that the \$14.2 billion Congress allocated to the ACP program will be depleted by mid-2024⁷. To allow time for the FCC to modernize USF to include ACP, Congress must allocate bridge funding to sustain ACP through the end of 2024 at a minimum.

USF should fund the Digital Equity Foundation

Well-intentioned efforts to address the digital divide during the COVID-19 lockdowns were often limited to providing emergency internet access. For example, schools throughout the country passed out mobile hotspots, often without any training; the result was many were never even turned on. Many communities learned that solutions must be holistic and include digital skills training, sustained access to appropriate devices, digital navigation⁸, and technical support. To truly advance universal service, we must address all the barriers to digital equity - lack of affordable, robust connectivity; lack of appropriate devices; and lack of digital skills. Doing so requires human intervention. Technology itself will not solve the digital divide. As technology continues to evolve, how we use it continues to evolve, resulting in the continuous need for digital skills training, digital navigation, and technical support.

Funding from the Digital Equity Act will establish essential programming across the United States but is not a sustained funding source. As Congress notes in the Digital Equity Act, "(3) *achieving digital equity for all people of the United States requires additional and sustained investment and research efforts*"⁹. To address this additional and sustained need, the [Digital Equity Foundation, as proposed by Senator Ben Luján](#), should be added as a USF program. The

⁵ See Blair Levin, "Washington may be about to take a giant step backward in closing the digital divide" (blog), Brookings Institution, March 13, 2023, <https://www.brookings.edu/blog/the-avenue/2023/03/13/washington-may-be-about-to-take-a-giant-step-backward-in-closing-the-digital-divide/>

⁶ See Common Sense Media, *Closing the Digital Divide Benefits Everyone, Not Just the Disconnected: An analysis of how universal connectivity benefits education, health care, government services, and employment* (Common Sense Media; Boston Consulting Group, 2022) at 29-32, available at https://www.common Sense Media.org/sites/default/files/research/report/2022-cs-bcg-closing-digital-divide_final-release-3-for-web.pdf

⁷ See Paul Garnett, "When Will Affordable Connectivity Program Funding Run Out?", Vernonburg Group, 7/6/23 (<https://www.vernonburggroup.com/blog/when-will-affordable-connectivity-program-funding-run-out/>); Institute for Local Self-Reliance, "ACP Dashboard" (<https://acpdashboard.com/>).

⁸ Digital navigators are individuals who address the whole digital inclusion process — home connectivity, devices, and digital skills — with community members through repeated interactions.

⁹ Infrastructure Investment and Jobs Act, 47 USC § 1702 (2021).

Digital Equity Foundation should fund devices, digital skill support, and guidance in signing up for ACP. NDIA's affiliates¹⁰ already take some of the burden of providing sign-up support off the shoulders of the FCC (with and without outreach grants from the FCC). Sustained funding for the Digital Equity Foundation would ensure that local, trusted organizations have the resources to continue to assist their community members with ACP sign-ups and reach more people in need of services.

A National Digital Equity Plan would enable federal agencies to improve coordination among their digital inclusion and broadband programs. Just as the states are aligning state agencies within State Digital Equity Plans, the federal government should do the same. Doing so can reduce duplication of resources while increasing the impact of individual programs.

Sources of USF Contribution

Contribution to USF should come from multiple sources to reduce the fee amount assessed to any one service. Spreading around who pays may be politically more difficult but would reduce the percentage of the contributions. Determination of which sources to assess should be based upon those that:

1. Are for-profit entities that are positively impacted by the Universal Service Programs,
2. Currently have data upon which to assess the fee, and
3. Do not pass the fee on to low-income households.

Modernizing USF will be a heavy and difficult lift. NDIA commends this Working Group for initiating the conversation and commits to engaging the NDIA community of over 1,400 affiliates and providing their on-the-ground perspective to Congress and the FCC as the modernization process continues.

Sincerely,

A handwritten signature in black ink that reads "ASiefer". The letters are cursive and fluid, with the first name "Angela" being more compact and the last name "Siefer" being more extended.

Angela Siefer
Executive Director

¹⁰ "Affiliates." n.d. National Digital Inclusion Alliance. Accessed August 24, 2023.
<https://www.digitalinclusion.org/affiliates/>.