



July 18, 2016

Regulations Division  
Office of the General Counsel  
Department of Housing and Urban Development  
451 7th Street, SW  
Room 10276  
Washington, DC 20410-0500

**Comments of the National Digital Inclusion Alliance on HUD's proposed rule in Docket No. FR-5890-P-01, "Narrowing the Digital Divide through Installation of Broadband Infrastructure in HUD-funded new construction and substantial rehabilitation of multifamily rental housing"**

To whom it may concern:

The National Digital Inclusion Alliance (NDIA) respectfully submits these comments on HUD's proposed rule in Docket No. FR 5890-P-01, "Narrowing the Digital Divide through Installation of Broadband Infrastructure in HUD-funded new construction and substantial rehabilitation of multifamily rental housing".

NDIA represents leaders of community organizations, public libraries, local governments, housing authorities and other institutions working in our communities to reduce digital disparities among our neighbors. Our affiliates help millions of disadvantaged Americans to join the 21st century mainstream through digital literacy training, public Internet access, affordable home broadband services, and digital inclusion advocacy.

On behalf of this unique network of experienced community leaders and practitioners, NDIA advocates digital inclusion policies based in our shared conviction that broadband adoption is most effectively promoted by collaborative, community-driven efforts that combine affordable home broadband service, public broadband access, and technology training and support provide by trusted community partners.

NDIA currently counts 193 affiliated organizations. Our affiliates currently include 33 national nonprofits and 139 local public and nonprofit organizations in 31 states and the District of Columbia, and in 41 urban metropolitan areas. Local NDIA affiliates include fourteen municipal governments, three housing authorities, twenty-two local public libraries and regional library councils, and eighty-one local nonprofit organizations. A full list and map of NDIA affiliates can be found at <http://www.digitalinclusionalliance.org/members/>.



## Comments on the proposed rule:

The National Digital Inclusion Alliance has strongly supported the ongoing effort of President Obama, the Broadband Opportunity Council, and HUD to foster broadband deployment and adoption for all Americans, including the 45% of American households with incomes below \$35,000 a year which still lack home broadband access. We recognize that the proposed rule is an important part of this overall effort, and we commend HUD's leadership for taking steps to remove one barrier to affordable broadband access in affordable housing units it helps to finance.

NDIA does not, itself, possess special expertise or experience in the areas of affordable housing development and financing, so we will not comment independently on the specifics of the proposed rule.

But we do wish to add our support for some key points made in comments submitted by two of our affiliates which do possess that kind of expertise and experience: The National Housing Conference, and the City of Seattle, WA.

Quoting from comments of the National Housing Conference:

*"While having broadband infrastructure in HUD multifamily properties is a significant first step to home internet for low-income residents, NHC hopes that HUD is also exploring ways to make connection more available and to make adoption a reality for more HUD residents. This proposed rule is a positive step forward but is only one part of the effort to connect HUD residents. Without assistance to pay for the unit connection, devices and digital literacy training, residents may not have meaningful internet access. As part of this effort, NHC encourages HUD to consider ways to leverage models and best practices from the ConnectHome initiative and other work being done by housing providers. HUD can also encourage partnerships with internet service providers who provide low-cost internet service for eligible households, like Comcast's Internet Essentials programs. Exploring ways to better utilize the Federal Communication Commission's Lifeline program that can now support broadband should also be an important element of this effort to bridge the digital divide."*

*"HUD has made good strides in clarifying that broadband is an eligible expense, like the recent guidance on broadband in HOME, CDBG, and the National Housing Trust Fund. HUD should continue these efforts for all multifamily development programs. Building on these initial steps, HUD should explore treating cost-effective basic broadband as a standard operating cost for affordable housing properties."*

*"In the proposed rule, HUD acknowledges that properties in rural locations may not be*



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*able to install broadband infrastructure, which highlights the challenge of getting rural communities as a whole connected to the internet. HUD should coordinate with USDA when possible to help get these communities connected. For instance, when HUD funds a multifamily property in a rural community that does not have the infrastructure to even support broadband, HUD should coordinate with USDA to see if the agencies could leverage their programs to address this 'last mile' connection."*

Quoting from comments of the City of Seattle:

*"[Implementation of the rule should] Encourage sufficient infrastructure to enable competitive internet options and allow for aggregated purchasing and service delivery."*

*"Local housing providers should be enabled with options to provide the best, lowest cost service to residents as possible. The two primary means to do this are to 1) enable multiple competitive providers, or 2) enable the housing provider and residents to aggregate purchasing and delivery of service. To do this there either needs to be sufficient conduit and wiring from the entry point to each unit, or to a central distribution managed distribution system where either a single best provider can be selected or multiple providers can offer service through the building distribution system."*

*"Housing should be planned with the capacity for wired and wireless. Wireless infrastructure planning should also include consideration of building materials, electrical and conduit leads for access point placement and reasonable wireless penetration. This has been a barrier in developing internet access services in some current buildings."*

*"Internet infrastructure should include common areas and meeting spaces. Many low income housing communities also benefit from infrastructure that allows internet provision in common areas and meeting spaces where they can be used for digital literacy training, computer access, use of the internet during community meetings, and other education and civic applications."*

*"Buildings should have broadband capacity for higher and future capacity needs. The FCC standard is a minimum, but limits capacity for education, health and civic applications."*

*"Infrastructure is not the total solution to narrowing the digital divide and should be coupled with other HUD efforts... These rules for infrastructure buildout will be most effective when coupled with support for broadband adoption and digital literacy programs, along with mechanisms that allow local HUD recipient housing providers to lower the cost of services to residents."*





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*"... We recommend that HUD additional consider rules that treat broadband as standard operating cost and eligible expenditure in affordable housing. This recognition of the utility of broadband services would enable localized programs that could reduce cost and barriers to adoption by aggregating costs and internet delivery... This could further enable models developed in conjunction with use of the upcoming FCC Lifeline broadband program for low income residents."*

NDIA supports these important, common-sense insights and recommendations from NHC and Seattle, and urges HUD to consider them seriously in finalizing and implementing the final version of the proposed rule.

Thank you for the opportunity to comment on the proposed rule on behalf of NDIA's affiliates.

Sincerely,

Angela Siefer  
Director  
NDIA