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October 30, 2017

To: Daryl D. Parks
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Tallahassee FL 32301

AT&T
represented by
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The National Digital Inclusion Alliance (NDIA) and partner signatories appreciate the FCC Staff's offer of mediation of two digital redlining complaints against AT&T, brought by Attorney Daryl Parks on behalf of complainants in Cleveland and Detroit. We also appreciate AT&T's agreement to participate. (See FCC Docket No. 17-223 and 17-270 and Joint Statement of the Parties posted 10-4-17.)

Attorney Parks and his clients, complainants Joanne Elkins, Hattie Lanfair, Rachelle Lee, Edward Garner Taylor, Esq. and Ray Taylor, have raised significant issues of law and basic equity affecting hundreds of thousands of households in Cleveland and Detroit, and millions across AT&T's wireline service territory. We are grateful to these individuals for taking a stand on behalf of their neighbors and communities.

AT&T's broad, decade-long pattern of discrimination against low-income neighborhoods in its deployment of fiber-enhanced broadband technologies, as documented in the complaints, can be remedied if the company is willing to undertake a serious effort to do so. We hope AT&T's acceptance of mediation shows a willingness to discuss what such an effort would entail.

On behalf of our 281 affiliate organizations and the other signatories, the National Digital Inclusion Alliance respectfully submits the following suggested framework for a reasonable,





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accountable resolution of the complaints. Since the complaints were filed on behalf of complainants in Cleveland and Detroit, we limit our suggestions to those two cities.

Recommendation: AT&T should agree to take whatever steps are necessary, including additional deployment of fiber and other infrastructure, to ensure that it can offer Internet service to any Cleveland or Detroit household at speeds of at least 25 mbps downstream and 3 mbps upstream. To meet this goal, we suggest the following:

- 1) A detailed plan describing specific new deployments of fiber and other infrastructure, should be submitted to the FCC and Attorney Parks within 6 months of the mediated agreement.
- 2) New deployments covered by the plan should be 50% complete within 18 months of the mediated agreement.
- 3) New deployments covered by the plan should be 100% complete within 3 years of the mediated agreement.
- 4) Degree of completion should be measured as the percentage of residential addresses which could not receive AT&T Internet service at 25/3 mbps as of December 31, 2017, for which such service has become available.
- 5) Beginning three years after the mediated agreement, for each year deployment is not complete, AT&T should donate \$10 million each to foundations (agreed upon by both Attorney Parks and AT&T) in each city to support broadband access and adoption.

Please do not hesitate to contact us if we can be of any assistance to your efforts.

Sincerely,

Angela Siefer
Executive Director
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