

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

In the Matter of)	
)	
Amendment of Parts 1, 21, 73, 74 and)	
101 of the Commission's Rules to)	
Facilitate the Provision of Fixed and)	WT Docket No. 03-66
Mobile Broadband Access,)	(Terminated)
Educational and Other Advanced)	
Services in the 2150-2162 and)	
2500-2690 MHz Bands)	
)	
Transforming the 2.5 GHz Band)	WT Docket No. 18-120

COMMENTS OF THE NATIONAL DIGITAL INCLUSION ALLIANCE

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The National Digital Inclusion Alliance (NDIA) respectfully submits these comments in response to the FCC's Notice of Proposed Rulemaking in the matter of "Transforming the 2.5 GHz Band", WT Docket No. 18-120.

We are leaders of local community organizations, public libraries, municipalities and other institutions working hard to reduce digital disparities among our neighbors. To improve the daily lives of all community members, we call for digital inclusion public policies that reflect our expertise and diverse experiences.

Our approach is based in the knowledge that broadband adoption is most effectively promoted by community-driven efforts combining:

- Affordable home broadband service.
- Public broadband access.
- Appropriate affordable devices.
- Locally trusted technology training and support.

The National Digital Inclusion Alliance represents organizations with a wide range of experience reducing the digital divide in the United States. The experiences of our affiliates

include providing guidance to low-income parents connecting to their children's teachers, teaching seniors how to use their electronic health records, helping veterans learn digital skills in order to acquire a job, and enabling disabled adults to participate more fully in their communities. The services of our affiliates include digital literacy training, public Internet access, home broadband programs and digital inclusion advocacy.

NDIA currently has 340 affiliated organizations, including 42 national nonprofits and 257 local public and nonprofit organizations in 39 states, the District of Columbia and the US Virgin Islands. Our local Affiliates include 29 municipal government bodies, 45 local public libraries and regional library councils, 17 college/university programs, 13 state government agencies, 3 local school districts, 8 housing authorities and 142 local nonprofit organizations. The full list of NDIA affiliates with links to their websites can be found at <https://digitalinclusion.org/members>.

In these brief comments, NDIA does not intend to discuss the technical issues raised by the NPRM. Instead, we urge the Commission to keep three important facts in mind as you address these issues:

1) Digital inclusion – defined as activities to ensure that all individuals and communities, including the most disadvantaged, have access to and use of computer and Internet technology – is both an important educational function in itself, and a critical underpinning of 21st century adult and K-12 education strategy in many digitally underserved communities across the U.S.

Community digital inclusion programs provide hundreds of thousands of adults with basic digital skills training; support their transition to the use of these skills in employment training, GED preparation, postsecondary education, entrepreneurship and other adult learning environments; and assist families to overcome the K-12 “homework gap” by acquiring affordable home computers and Internet access. In addition, community digital inclusion programs often engage in partnerships with their local K-12 school systems to provide after-school programming, homework assistance, and advanced technology learning such as website development and coding for elementary and high school students.

2) Very affordable mobile wireless broadband accounts, offered by nonprofit resellers (and NDIA affiliates) Mobile Citizen and Mobile Beacon, play a critical and growing role in community-based digital inclusion efforts throughout the U.S. These accounts, typically costing eligible low-income households only \$10 per month for unlimited Sprint mobile hotspot access, are uniquely possible due to provisions of the providers' Educational Broadcast Spectrum leasing agreement with Sprint.

The value of very affordable, non-data-limited Mobile Citizen and Mobile Beacon access for participating households' digital literacy and K-12 education outcomes has been documented repeatedly – notably in a 2017 study ¹ of low income Twin Cities households who signed up for Mobile Beacon accounts through “Bridging The Gap”, a program of NDIA affiliate PCs for People.

¹ See https://www.mobilebeacon.org/wp-content/uploads/2017/05/MB_ResearchPaper_FINAL_WEB.pdf

3) Educational institutions holding EBS spectrum allocations and spectrum leasing contract have often enabled support for other digital inclusion initiatives in underserved communities throughout the U.S., sometimes through collaborations between those institutions and other local anchors or nonprofits. Examples include 4G hotspot lending programs initiated by a number of local library systems in recent years, 4G accounts provided by local EBS spectrum holders directly to K-12 students, and innovative LTE network development by school systems in underserved rural areas.

In light of the importance of existing EBS allocations and EBS spectrum leasing arrangements to digital inclusion efforts across the U.S., NDIA asks the Commission:

- To be careful to take no actions as a result of this proceeding which will reduce the spectrum allocations available to educational institutions or, through those holders, to established local EBS coalitions and nonprofit resellers such as Mobile Citizen and Mobile Beacon;
- To give existing EBS holders, as well as local nonprofit and public educational institutions, an unequivocal priority over for-profit entities in the allocation of underutilized EBS spectrum;
- To retain the existing educational use requirements for EBS spectrum allocations; and
- To explicitly identify digital inclusion – i.e., activities to ensure that all individuals and communities, including the most disadvantaged, have access to and use of computer and Internet technology – as an educational use for purposes of meeting this requirement.

Thank you.