

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
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Affordable Connectivity Program)	WC Docket No. 21-450
)	
Emergency Broadband Benefit Program)	WC Docket No 20-445
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COMMENTS OF COMMON SENSE

Drew Garner
State Broadband Policy Fellow

Amina Fazlullah
Senior Director, Equity Policy

Common Sense
699 8th Street
Suite C150
San Francisco, CA 94103

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I. SUMMARY

Common Sense Media (“Common Sense”) hereby respectfully submits comments on the Federal Communications Commission (“Commission” or “FCC”) Wireline Competition Bureau request for comment on the Affordable Connectivity Program (“ACP”). We ask the Commission to design the ACP outreach grant program so that it allows activities such as traditional marketing campaigns, text message-based campaigns, and the creation of material that supports institutional outreach and enrollment. We also ask the Commission to allow participation from a wide range of public-serving organizations and to minimize the administrative burden for applicants and participants.

II. BACKGROUND

Common Sense is the nation’s leading independent nonprofit organization dedicated to helping kids and families thrive in a world of media and technology. We empower parents, teachers, and policymakers by providing unbiased information, trusted advice, and innovative tools to help them harness the power of media and technology as a positive force in all kids’ lives. Common Sense has an uncommon reach among parents and teachers, with over 100 million users and one million educators across its networks and platforms. We have a long and established track record of advocating for broadband connectivity for all children and families, in schools and at home, regardless of their socioeconomic status and geographic location.

Research conducted by Common Sense has found that the digital divide disproportionately impacts low income and minority families.¹ Among kids from lower-income

¹ Rideout, V.J. & Robb, M.B. *The Common Sense Census presents: Research brief. Remote learning and digital equity during the pandemic*. San Francisco, CA: Common Sense; Chandra, S., Chang, A., Day, L., Fazlullah, A., Liu, J., McBride, L., Mudalige, T., Weiss, D., (2020). *Closing the K–12 Digital Divide in the Age of Distance Learning*. San Francisco, CA: Common Sense Media. Boston, Massachusetts, Boston Consulting Group.

households, nearly 25% do not have a computer at home and nearly 40% do not have residential broadband. Among kids from higher-income households, those numbers are 5% and 10%, respectively. Similarly, minority families often lag behind White families in terms of connectivity. Nearly 90% of White households have some form of broadband, compared to roughly 75% of Black households and less than 70% of Hispanic households.

These findings are confirmed by multiple sources. EducationSuperHighway identified affordability as the leading cause of the digital divide and found that Black and Hispanic households are more likely to lack connectivity than their White counterparts.² Pew Research concluded that over 25% of Black and Hispanics households lack home broadband.³ The Bureau of Indian Affairs found that over 33% of households on Tribal lands lack access to 25/3 Mbps.⁴ Together, these and other findings repeatedly demonstrate that the digital divide affects a diverse range of communities and that economic inequality is one of its driving factors.

The ACP was created to address these issues. However, as of January 2022, fewer than one in five eligible households has enrolled.⁵ This underutilization stems in part from a lack of awareness about the ACP. The ACP is a new program, and, according to a survey by AT&T,

² EducationSuperHighway, *No Home Left Offline Report* (November 2021), https://www.educationsuperhighway.org/wp-content/uploads/No-Home-Left-Offline-Report_EducationSuperHighway2021.pdf (last visited March 16, 2022)

³ Andrew Perrin and Erica Turner, *Home broadband adoption, computer ownership vary by race, ethnicity in the U.S.*, (July 16, 2021), <https://www.pewresearch.org/fact-tank/2021/07/16/home-broadband-adoption-computer-ownership-vary-by-race-et-ethnicity-in-the-u-s/> (last visited March 16, 2022)

⁴ U.S. Department of the Interior, Indian Affairs, *National Tribal Broadband Strategy*, (January 15, 2021), https://www.bia.gov/sites/bia.gov/files/assets/as-ia/doc/2020_%20December_%20National%20Tribal%20Broadband%20Strategy%20FINAL-cover%20change.pdf (last visited March 16, 2022)

⁵ Rural LISC and Heartland Forward, *Emergency Broadband Benefit Snapshot*, <https://www.lisc.org/rural/our-work/broadband-infrastructure/emergency-broadband-benefit-snapshot/> (last visited March 16, 2022)

most households have not heard of it.⁶ This is why Congress gave the Commission the authority to conduct ACP outreach.⁷ If the ACP is to be maximally effective, eligible households must be:

1. Made aware of the program and how it works;
2. Informed about available service offerings and participating providers;
3. Educated about the uses and benefits of connectivity; and,
4. Helped to establish eligibility and enroll in the program.

We submit these comments to help the Commission design a grant program that will achieve these goals.

III. PERMITTED OUTREACH ACTIVITIES (Q275)

The digital divide afflicts a diverse range of communities. These communities are geographical distinct, use a variety of languages and communication media, trust different organizations, and have varying levels of technological fluency. No single outreach method will be appropriate for all communities, and so the Commission should encourage a range of approaches. To this end, we recommend the Commission allow the following activities:

A. The Commission Should Allow Traditional Advertising Campaigns

The Commission should allow recipients to use grant funds to cover costs associated with traditional advertising campaigns. Specifically, recipients should be allowed to contract with third party organizations not named in the grant application for the purposes of marketing strategy and planning, content creation, content distribution, and acquiring space for advertising content. For example, a recipient should be allowed to hire an advertising agency to create ACP promotional material and broadcast it across TV, radio, and social media. Such contracting

⁶ Fierce Telecom, *AT&T survey finds most consumers aren't aware of broadband subsidies*, <https://www.fiercetelecom.com/broadband/att-survey-finds-most-consumers-arent-aware-broadband-subsidies> (last visited March 16, 2022)

⁷ See 47 U.S.C. §§ 1752(b)(10)(C)(i)-(ii).

arrangements will allow nonprofits to produce higher-quality marketing campaigns than they could if limited to in-house resources, resulting in more effective promotion of the ACP.

Nonprofits are often trusted institutions, and nonprofit-led advertising will benefit from their reputation and ability to provide ISP-agnostic purchasing and enrollment guidance. This will reinforce the ACP's legitimacy among the eligible community.

The Commission should allow a duration of at least a year for traditional advertising grants. This duration will allow recipients to take advantage of cost efficiencies associated with long-term marketing arrangements. Similarly, the Commission should streamline any reapplication process for recipients seeking additional rounds of funding. Comprehensive and efficient ACP promotion will require prolonged campaigns, and the Commission should facilitate them however possible. The Commission should also require recipients of such grants to demonstrate that their campaigns will target vulnerable communities, use languages and communication media relevant to those communities, and drive traffic to resources capable of supporting enrollment and digital inclusion programming.

B. The Commission Should Allow Text Message-Based Campaigns

The Commission should allow recipients to use grant funds to cover the cost of activities associated with text message-based campaigns. Recipients should be allowed to develop and administer messaging platforms, create content, acquire phone numbers, and pay for distribution costs. Texting campaigns are an effective way to reach people in the digital divide; they do not require the internet, they use familiar and accessible forms of communication, they can be relatively inexpensive per impression, and they can deliver information that can be accessed at the receiver's leisure, which is good for busy parents or people working multiple jobs. Texting is already used by governments and school districts to disseminate alerts and information, and it could be an effective way to raise awareness about the ACP among vulnerable populations.

The Commission should require recipients of such grants to demonstrate that their campaigns will target vulnerable communities, use appropriate languages, and drive traffic to resources capable of supporting enrollment and digital literacy education. The Commission should also encourage recipients to work with existing government texting programs, particularly those that confer ACP eligibility to their participants. These programs, namely WIC, SNAP, SSI, Medicaid, and Lifeline, may already have the ability to text their participants. If they do, they could be used to efficiently and precisely target ACP outreach. Not only would this promote the ACP, the resulting connectivity would allow those programs' participants to make better use of the programs' online resources.

C. The Commission Should Allow Recipients to Produce Content and Training for Other Organizations

The Commission should allow recipients to use grant funds to create and distribute materials that enable other organizations to promote the ACP. Such uses, like creating toolkits, fliers, or train-the-trainer guides, offer a relatively inexpensive way to leverage existing institutional networks. For example, a grant recipient connected to a network of schools⁸ could develop guides for bulk purchasing, training for the community eligibility enrollment processes, and fliers for parental-awareness. By distributing these materials across the network of schools, the recipient would be empowering trusted, community-based institutions to promote the ACP. This would greatly magnify the impact of the original grant.

D. The Commission Should Create a Database of ACP Advocates

The Commission should either create or allow a grant recipient to create a publicly accessible database of organizations that are engaged in ACP outreach and enrollment. For

⁸ Common Sense Education is one such organization. It produces a digital literacy curriculum that is in over 72% of U.S. K-12 schools (and 86% of all Title I schools) and used by more than 1.2+ million member educators across all 50 states. Material could be designed for this curriculum that would help member schools and educators engage in ACP promotion, enrollment, and bulk purchasing.

reputability, this database should be hosted on an official government website. It should also be searchable and contain the listed organizations' contact information and details about their service area, expertise, and available ACP resources. Such a database will allow for resource sharing and coordination of ACP campaigns.

IV. ELIGIBLE ENTITIES (Q276)

The Commission should make ACP outreach grants available to a wide range of public service oriented organizations. These organizations include, but are not limited to, state, local, and tribal governments, social service agencies, school districts, libraries, public housing authorities, non-profits, community-based organizations, and other entities with a successful record of promoting government programs. When reviewing applications, the Commission should consider the applicant's connection to ACP-eligible populations, its experience with marketing and/or program enrollment, and its demonstrated knowledge of social, economic, and connectivity issues.

V. APPLICATION PROCESS (Q277)

The Commission should ensure that the application process, reporting requirements, and financial requirements are minimally burdensome. Overly burdensome processes will inhibit participation from smaller, locally-focused organizations, who may not have experience with federal grant writing. However, these organizations may have a wealth of experience with community engagement, and so the Commission should do what it can to foster their participation.

Specifically, we recommend the Commission tailor reporting requirements to the grant application when possible. If a grant is used for advertising, the recipient should be required to

track related metrics such as impressions and outreach numbers, but they shouldn't be required to track enrollment. Conversely, if a recipient is engaged in hands-on enrollment, they should not necessarily have to track how enrollees learned of the ACP. This data is useful and the Commission should make it easy for recipients to submit and view other submissions, but recipients should not be required to track every metric. Such a requirement may be overly burdensome and complicate grant implementation.

VI. CONCLUSION

The ACP was created to address the leading cause of the digital divide—affordability.⁹ However, to be effective, eligible households must first learn about the ACP and be helped with enrollment. This can be challenging for a number of reasons: many eligible households lack connectivity and so raising awareness about the ACP is difficult; complicated application processes can be a barrier to those with limited language or technological fluency; and a lack of familiarity with the benefit may lead some to be skeptical of its authenticity. This grant program will overcome these challenges if it is designed to generate diverse types of outreach from a diverse set of organizations.

⁹ EducationSuperHighway, *No Home Left Offline Report* (November 2021), https://www.educationsuperhighway.org/wp-content/uploads/No-Home-Left-Offline-Report_EducationSuperHighway2021.pdf (last visited March 16, 2022)