



May 18, 2018

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Jessica Rosenworcel
Commissioner Brendan Carr
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Public Reporting of Affordable Internet Subscriptions by Internet Service Providers

Dear Chairman Pai and Commissioners Clyburn, O'Rielly, Rosenworcel, and Carr:

The Utility Reform Network (TURN), California Emerging Technology Fund (CETF), and The Greenlining Institute have worked diligently for more than a decade to sponsor and lead successful initiatives to close the Digital Divide in California. We have made significant progress, but much work still must be done to reach our most disadvantaged populations. More than 5 million Californians remain unconnected without home Internet access and more than 7 million are underconnected with Internet access only through a smartphone—a marvelous device but not sufficient for students to do homework and adults to gain workforce skills.

Collaboration among policymakers, regulators, Internet Service Providers (ISPs), and community-based organizations, coupled with accountability and transparency, is essential to reach this goal. We commend the Federal Communications Commission for establishing the Connect America Fund 2, as it will incentivize ISPs to build infrastructure projects and encourage adoption by the hardest-to-connect populations in California and throughout the nation. We have encouraged incumbent providers to apply for CAF2 to extend broadband access to rural communities. We also applaud the Commission for recognizing the need for affordable high-speed Internet service for low-income households and memorializing reduced-cost broadband offers in the approvals of many corporate consolidations. As a result, most large ISPs offer affordable Internet service for eligible low-income households, but many were required as a condition of a merger and are set to expire in the next few years, and some are entirely voluntary. Thus, time is of the essence to step up promotion of the affordable offers to enroll as many eligible low-income households as possible. Unfortunately, focus groups and surveys reveal that the majority of low-income residents are not aware of the affordable offers and many need assistance to get through the sign-up process. More must be done.

Therefore, we are writing to request that you require each ISP to regularly publicly report on the progress it is making in signing up low-income households for affordable high-speed Internet service. ISPs currently hold this vital information privately and only submit limited adoption data confidentially to the FCC. Transparency is needed for accountability and to guide policymakers, public agencies, and community organizations in targeting outreach efforts to inform eligible households. Public reporting will drive more progress.



TURN, CETF, The Greenlining Institute, national consumer organizations, and community partners all rely on data to allocate our limited resources in seeking to close the Digital Divide. However, it is clear that too many Americans are being left behind at an accelerating pace because they are not online at home. Further, efforts to date are falling short of the goals for digital inclusion when the majority of low-income households are not aware of the affordable offers. Therefore, we respectfully urge you to request each ISP that offers an affordable Internet service subscription as a public benefit in conjunction with securing approval for a corporate merger or acquisition, whether or not the regulatory-required timeframe for making the offer available has expired, publish the following information quarterly on the FCC website:

- Subscription data by state and by census tract, delineating how many eligible households totally have signed up for the affordable broadband offer and how many have dropped service in the last quarter and cumulatively since the offer was made available.
- Advertising activity during the last quarter, particularly television and radio advertising (by state, by station, times and frequency).
- Other relevant outreach activity during the last quarter, such as community information forums and grants to non-profit community-based organizations to assist in distribution of information, digital literacy, and sign ups (by state).

The available affordable offers are a time-limited resource to accelerate digital inclusion and enable our poorest and most disadvantaged households to participate in the digital economy and become more self-sufficient. Getting everyone online will increase educational and economic opportunities for the betterment of all Americans. Now is the time for transparency and accountability.

Sincerely,

Barbara O'Connor, Secretary and Co-Chair
California Emerging Technology Fund

Richard Motta, Treasurer and Co-Chair
California Emerging Technology Fund

Carol Whiteside, Audit Committee Chair
California Emerging Technology Fund

Orson Aguilar, President
The Greenlining Institute

Mark Toney, Executive Director,
The Utility Reform Network (TURN)

Sunne Wright McPeak, President and CEO
California Emerging Technology Fund