



California Emerging Technology Fund
Recommendations for Internet Service Providers to Consider in Responding to COVID-19
10 Steps to Improve Promotion and Administration of Interim Free and Affordable Offers
“How to Get All Low-Income Households Online to Achieve Broadband For All”
April 2020

The California Emerging Technology Fund (CETF) was directed to be established by the California Public Utilities Commission (CPUC) as a public benefit from corporate mergers in 2005 with the mission to close the Digital Divide in California. CETF works with policymakers, regulators, and stakeholders to accelerate the deployment and adoption of broadband, a generic term for high-speed Internet infrastructure, including both wireline and wireless technologies. In pursuit of Digital Equity, CETF works with public agencies, schools, and community-based organizations (CBOs) throughout the state to inform unconnected households and digitally-disadvantaged populations about available reduced-cost affordable home Internet service offers and to assist them in signing up for service. The current health crisis has illuminated the Digital Divide, especially in light of governmental directives to “shelter-in-place” that necessitate distance learning, remote working, and telehealth.

Internet Service Providers (ISPs) are to be commended for stepping up to meet the challenges of the COVID-19 pandemic by providing interim free service, increasing allowed data for specific plans, forgiving customer late fees, sustaining service by increasing compensation for their workforce, and installing emergency connectivity for critical care facilities. CETF salutes these efforts and recognizes the enormity of launching new products and implementing these kinds of practices nationwide involving multiple call centers and thousands of employees. CETF regularly conducts quality-control test calls into the ISP call centers to monitor how low-income households are treated and receives trustworthy feedback from CBOs and schools about the experiences of low-income households trying to sign up for interim free and affordable service offers. While each ISP has its own customized affordable offer and eligibility criteria, and there is a lot of variation among customer representatives as to how they interact with low-income prospective customers, there are shared challenges and issues for all ISPs to address. Therefore, the purpose of this document is to provide recommendations for all ISPs to improve the promotion and administration of interim free and available affordable offers. Overall, there is a need to increase advertising of the interim free and available affordable offers and to improve the subscription process for low-income customers to avoid upselling.

The 2019 Statewide Survey on Broadband Adoption (sponsored by CETF and conducted by the Institute of Government Studies, University of California, Berkeley) documented that only 30% of California households eligible for reduced-cost affordable home Internet service are aware of the offers—and, half of those who are aware don’t trust the ISPs. Focus groups comprised of low-income residents revealed that families with only a smartphone periodically buy relatively-expensive data plans (Internet access) so their children can do their homework; and they end up paying more for data than they would if they were subscribers to an affordable offer.

Thus, given that 70% of eligible households are not aware that they qualify for reduced-cost home Internet service offers, ISPs need to increase advertising (including a telephone number and not just a website), especially through community and ethnic media channels. Partnerships between ISPs and “trusted messengers” (school districts, energy utilities, assistance programs such as CalFresh) to notify eligible households by mail are very effective, especially if CBOs are engaged as partners to help low-income households sign up for the subscription. ISPs also need to train their call center personnel to sincerely assist low-income residents by informing them about the interim free and affordable offers for which they are eligible without upselling them and failing to disclose future costs of market-rate plans.

CETF recommends that ISPs implement the following 10 Steps to improve their affordable offers process and to significantly increase the number of low-income households who sign up:

- Offer interim free service to all prospective customers, including low-income households.
- Train customer service call center personnel not only to offer the interim free service during this crisis, but also to promote sincerely the reduced-cost affordable home Internet offer by screening diplomatically for eligibility at the beginning of each call.
 - In a customer-friendly and helping-tone of voice, ask if the prospective customer has a child in school “on the lunch program” or if the family “uses CalFresh”.
 - If the caller answers “yes” to either question, then let the prospective customer know that the family is eligible for the affordable offer in addition to the initial free service.
 - Clearly explain the benefits of the reduced-cost affordable offer.
- Prohibit upselling prospective low-income customers to higher-priced packages (including not criticizing the affordable offers). Of course, customers may choose whatever service packages they prefer and can afford, but call center personnel need to clearly explain the amount of the market-rate bill that will be sent after the free-offer period.
- Designate families in schools with a high percentage of students (such as 70% or more) eligible for the National School Lunch Program (NSLP) as automatically qualified for the affordable offer (referred to as “auto-enroll” of all students in the school).
- Sign up eligible customers immediately for the affordable offer (who say their child is on the lunch program or that they use CalFresh) without first requiring the NSLP-eligibility letter from the school (which is not possible to obtain during this crisis). Don’t make the customer wait. (The ISP could ask for the verification of eligibility by the end of 2020.)
- Allow existing customers on market-rate plans who qualify for the affordable offer to switch immediately to the reduced-cost plan without having to wait or suspend Internet service for a certain period of time.
- Accept multiple eligible households with the same residential address to sign up for the affordable offers. (Given the cost of housing, it is increasingly common that multiple families are sharing the same dwelling unit.)
- Increase advertising significantly for the affordable offers with a telephone number for prospective customers. Use community and ethnic media to advertise in-language and in-culture to reach the most digitally-disadvantaged.
- Expand staffing at the call centers to decrease wait times for customer service. Ensure that call centers have multiple-language proficiency, especially Spanish-speaking representatives.
- Collaborate with and fund CBOs as “trusted messengers” and “honest brokers” to conduct outreach in-language and in-culture to digitally-disadvantaged communities and to assist unconnected low-income households through the sign-up process.