

January 23, 2021

Hon. Jessica Rosenworcel, Chairwoman
Hon. Geoffrey Starks, Commissioner
Hon. Brendan Carr, Commissioner
Hon. Nathan Simington, Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of WC Docket No. 20-445

Dear Chairwoman Rosenworcel, Commissioner Carr, Commissioner Starks, and Commissioner Simington:

I write today on behalf of the Hispanic Technology and Telecommunications Partnership (HTTP), representing the most influential national Hispanic organizations engaged in policy solutions for the U.S Hispanic community, to encourage the FCC to evaluate the eligibility requirements for the Emergency Broadband Benefit Program to ensure that frontline Latino community members who are most critically impacted by the global health crisis are able to benefit from this important subsidy.

As the United States enters the third wave of the Covid19 pandemic, it continues to expose the deep racial and economic inequality embedded in our country's response systems. In the first week of 2021 alone more cases of Covid19 were reported than at any other time --bringing with it the second-highest number of deaths. Not surprisingly Black, Latino, and Indigenous communities over index in both infection rates and death as a result of long standing racial disparities.¹ Among those most critically affected are frontline immigrant communities including undocumented immigrants. Lack of access to affordable at home broadband, health care, ineligibility for most government relief programs, and job instability have left undocumented immigrant families especially vulnerable amid the pandemic.²

For Latino communities who can most benefit from telehealth solutions, including seniors, veterans, and those with disabilities or pre existing conditions, having a reliable connection to low cost Internet is directly correlated with their ability to shelter in place during a global pandemic. In their most recent findings, MIT researchers Lesley Chiou and Catherine Tucker credit the unequal diffusion of high-speed Internet in homes across regions as one of the key indicators of whether individuals are able to comply with state-level directives to avoid leaving their homes. As is the case with healthcare, education and housing, they conclude that "the digital divide—or the fact that income and home Internet access are correlated—appears to explain much of the inequality we observe in people's ability to comply with shelter in place mandates or take advantage of remote learning opportunities."³

¹ <https://covidtracking.com/race>

² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7357736/>

³ https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3568255

Affordability continues to be one of the clearest structural barriers to adoption followed by the lack of culturally inclusive digital skills training to ensure that multicultural communities are able to develop the range of skills needed to be engaged participants in digital spaces. 37% of Latinos report that a home Internet connection is too expensive, compared to 22% of Whites. Access to Internet-ready devices also represent a significant barrier to broadband adoption with 15% of Latinos reporting not having a desktop computer, compared to 13% of Whites.⁴

With the establishment of the Emergency Broadband Connectivity Fund, Congress allocated \$3.2 billion for the Emergency Broadband Benefit Program with the goal of connecting low-income households, especially households with school-aged children, to at home broadband at affordable rates. Data from the Department of Education shows that Black, Latino, Asian, and American Indian currently account for 52.9% of public K-12 students (28% Latino) yet 4.7 million of these students combined lack the high speed home Internet service necessary to support online learning.⁵

Expand eligibility for Lifeline and the Emergency Broadband Benefit (EBB)

Many of these students could stand to benefit from legacy programs administered by the FCC like Lifeline, were it not for the citizenship requirement currently in place which denies benefits to anyone without a social security number. As the commission seeks to establish the Emergency Broadband Benefit Program under new leadership, we urge the commission to expand the eligibility requirements for the forthcoming EBB by including other forms of identity verification such as the Individual Taxpayer Identification Number (ITIN) which is issued to certain non resident/resident aliens who cannot obtain a social security number.

Set a baseline of consumer eligibility and empower Internet service providers to track and verify that eligibility

Many Internet service providers have already adjusted their eligibility requirements to ensure that those most in need are able to access their low cost options. We encourage the commission to work with Internet service providers to establish a baseline of eligibility that considers the diverse needs of those most critically impacted by the ongoing health crisis and that prioritizes extending service to historically disconnected and currently unsubscribed communities within their footprint. Further, the Commission should work to recognize eligibility and verification processes for existing programs as part of the EBB.

Expand the pool of participating providers

HTTP supports FCC rulemaking to establish an "expedited process" to approve providers that are not already Eligible Telecommunications Carriers (ETCs), but want to participate in the program. We encourage the commission to pay special consideration to carriers that provide service to rural communities or have established programs that focus on vulnerable underserved populations such as low-income households, Tribal areas, communities of color, students, veterans, or those experiencing recent unemployment as a result of the Covid19 health crisis. It is important that all providers are able to begin participating in the program at the same time in order to give consumers the widest choice of options.

⁴ https://www.unidosus.org/Assets/uploads/Publications/profileslatinosandtech_issue1_42815.pdf

⁵ <https://futureready.org/homework-gap/>

Establish minimum requirements for devices eligible for reimbursement

The Consolidated Appropriation Act specifies that any member of a household that participates in the free and reduced-price lunch program or is a recipient of a Pell grant in the current year qualifies for a device subsidy. We encourage the FCC to set minimum requirements consistent for all participating carriers to ensure that reimbursements go towards devices that support video conferencing and other software essential to participation in online learning.

Reimbursement processes should be set up as a non-cash benefit

Even through no immigration restrictions exist for child nutrition programs, and children may obtain meals regardless of their immigration status, many immigrant families concerned with their future potential to become a United States citizen often elect not to enroll in the free or reduced lunch program for fear of becoming a “public charge” which would prevent them from becoming a lawful permanent resident. With that in mind, we encourage the FCC to structure the EBB reimbursement process as a non-cash benefit similar to the free/reduced lunch program paired with multi language educational resources to mitigate any potential hesitation to enrollment. We also encourage the Commission to partner with schools and community anchor institutions as a way of quickly identifying eligible households and leveraging the outreach mechanism of trusted community support organizations.

In order for the Emergency Broadband Benefit Program to be successful at supporting every community with equitable access to broadband, its implementation must be rooted in a commitment to addressing and redressing the structural inequalities of our communications infrastructure and work to ensure that every household can do their part to safeguard the health of their communities and benefit from our new digital normal.

Please count on Hispanic Technology & Telecommunications Partnership as a committed partner and resource as you implement this important broadband benefit.

Sincerely,



Alejandro Roark
Executive Director, HTTP

About Hispanic Technology & Telecommunications Partnership

The Hispanic Technology and Telecommunications Partnership (HTTP) is the leading national Latino voice on telecommunications and technology policy. We are a bipartisan partnership of national Latino organizations working to ensure that the full array of technological and telecommunications advancements are available to all Latinos in the United States. HTTP members are nonprofit organizations that support the social, political, and economic advancement of over 50 million Americans of Hispanic/Latino descent by facilitating access to high quality education, economic opportunity and effective health care through the use of technology tools and resources.