

## Recommendations to Increase Broadband Adoption for Opportunity Communities

Submitted by the  
Digital Inclusion Subgroup  
of the  
Digital Empowerment and Inclusion Working Group

FCC Advisory Committee on Diversity and Digital Empowerment

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**The COVID-19 Crisis Has Underscored the Importance of Digital Adoption Programs.** The impact of the COVID-19 pandemic has been particularly severe for those who lack access to broadband service, depriving them of work from home, distance learning, telehealth, and e-commerce capabilities that can mitigate the adverse economic and social effects of the pandemic.

As this report (attached) demonstrates, there is a broad range of effective, community-based digital inclusion and digital readiness programs – many of which are already undertaken by, or in conjunction with, local libraries. The recommendations outlined below are designed to improve coordination and foster synergies with these existing initiatives – and encourage and support new efforts in areas lacking such programs – so that the whole becomes much greater than the sum of the parts. To that end, we propose the following:

1. **The DEI Working Group Encourages the Use of New Terms and Definitions to Reflect Evolving Policy Landscape.** Digital adoption is a critical component to achieving full digital inclusion and equity. Digital adoption, however, is more than just the adoption of broadband at home – it includes access and use of devices, and use and participation in digital readiness, digital literacy, and skills training that goes beyond just the connectivity. To better reflect today’s ever-changing policy landscape, the DEI Working Group encourages advocates, researchers, industry partners, and government agencies to broaden the term “digital adoption” to encompass home use of broadband, digital readiness, digital literacy, and skills training.

The DEI Working Group also encourage advocates, researchers, industry partners, and government agencies to use the term “opportunity communities” rather than disadvantaged or low-income. The term encompasses communities that are traditionally underserved or face structural barriers to mobility and equity.

- 2. Government Programs Should Simplify and Better Coordinate Government Support and Address Connectivity and Technology Constraints so that Libraries Can Prioritize Other Aspects of Digital Adoption, Particularly Digital Skills and Training.** Libraries are often tasked with providing hot spots, Wi-Fi parking lots, and devices to their patrons – impacting their ability to focus on critical adoption, training, and use efforts. More coordination is needed between various government agencies and state library agencies to increase the use of support services currently available to libraries under existing programs. Often, small, and rural libraries do not have the resources or capacity to afford consultants to apply for government funding and therefore forgo applying for these funds.

Taking necessary steps to simplify and better coordinate government support, as well as providing libraries with the requisite broadband infrastructure and connectivity can, in turn, offer them the foundation for serving as stronger local hubs for digital skills training in communities across the country.

- 3. Improve Coordination of Federal Digital Empowerment Efforts.** The FCC is well-positioned to serve as a convener to support an enhanced vision for digital inclusion across the federal government. In addition to addressing broadband access issues – which are within the FCC’s purview – digital inclusion also expands focus to encompass digital adoption, digital skills training, and meaningful use of applications for job skills training and economic opportunity. The FCC can and should engage in better coordination among the myriad of federal agencies involved in addressing skills training and economic mobility efforts. There is insufficient coordination in the federal government at present, and the FCC could play an important role in promoting greater synchronization of these efforts. For example, the Commission should partner with other federal agencies in an interagency working group to discuss the development of a series of “challenge grants” (grants from federal agencies that can pilot specific initiatives) that focus on digital skills training/readiness to adoption.
- 4. Empower and Engage USAC to support Digital Adoption.** The FCC should look at USAC as more than an administrative body and support USAC’s mission-fulfilling role as a federal driver of digital adoption. The critical role that USAC plays in administering USF provides the organization with a unique understanding of challenges and gaps with implementation of programs such as E-Rate and Lifeline. This experience and expertise positions USAC as a strong FCC partner and collaborator in digital adoption efforts. USAC funding serves as the foundation for connectivity that supports adoption efforts. The Commission should support and encourage USAC to work

across federal, state, and non-governmental organization (NGO) partners to enhance its mission. The Commission should also leverage USAC’s expertise and experience in vital policy conversations related to digital adoption.

- 5. Simplify E-Rate Funding Applications and Advocate for Complementing E-Rate with Support for Digital Skills within Libraries.** The FCC should simplify the E-Rate funding application for libraries. Not all libraries are utilizing E-Rate, and a significant amount of E-Rate funds goes to consultants to help program applicants navigate the E-Rate enrollment and application process. A state’s E-Rate Coordinator is selected by their respective state to provide support and assistance to E-Rate program applicants. They are considered an “official State representative” when communicating with E-Rate program administrators (on behalf of applicants) and often interface directly with USAC and the FCC to improve program outcomes and “...convey recommendations and feedback to fulfill the goals of the [E-Rate] program...”<sup>1</sup> Although every state has an E-Rate coordinator, services rendered can vary state by state. Some states have stronger E-Rate coordinators than others. For this reason, creating a user-centric guide to E-Rate for libraries can help take-up rates and support more libraries.

In addition, the FCC should encourage Congress to seek ways to complement E-Rate funding, which is statutorily limited to on-site connectivity, to facilitate access to other resources to support the provision of digital readiness programs and equipment. Complementing E-Rate funds with other resources specifically available for library-based digital adoption and digital empowerment efforts would expand the benefits of E-Rate, while also improving broadband adoption among some of the country’s most vulnerable populations and communities. For example, ARPA allocated \$7.17 billion dollars for schools and libraries to facilitate off-site connectivity by establishing the ECF, which will be administered by USAC. Participating libraries will receive total reimbursement for the cost of hotspots, routers, laptops, tablets, and similar devices loaned to their patrons. However, the law does not address digital skills training that is necessary to deploy and manage the devices.

- 6. Incorporate Lessons Learned from the Coronavirus Public Health Emergency by Soliciting Feedback from a Range of Stakeholders.** Library stakeholders including the FCC should convene post-COVID-19 to assess the lessons learned from emergency programs and temporary policy changes implemented during the COVID-19 crisis and consider a new path forward of increased efficiency and support for broadband adoption. For example, the FCC waived the E-Rate program gift rule to allow libraries to receive support from service providers for remote learning efforts without fear of violating the FCC’s rules. However, the waiver is set to expire on June 30,

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<sup>1</sup> State E-Rate Coordinators’ Alliance (SECA), “SECA regularly communicates with the E-rate program administrator (“USAC”), the Federal Communications Commission (“FCC”) and other federal and state policy makers regarding the operation and administration of the E-rate program to convey recommendations and feedback to fulfill the goals of the program as enumerated by the FCC and Section 254 of the Telecommunications Act of 1996.” <https://secaerate.net/About-SECA>

2021, and the country is still in a pandemic. The DEI Working Group strongly encourages the FCC to consider the merits of an extension.

The FCC can convene a range of stakeholders from across government, industry, and local community groups to gain ideas and initiate efforts to amplify the agenda of the agency. These meetings can help stakeholders across various sectors coordinate efforts to support the FCC's mission while at the same time expose the FCC to new ideas from the front lines on ways to support more effective policy.

The DEI Working Group believes there are some important topics that the FCC should prioritize to bring together stakeholders to support libraries, a vital anchor institution, to drive adoption to many opportunity communities. Below are suggested discussions/workshops that the FCC can use to meet its overall objective to bridge the digital divide. The FCC Chair and individual Commissioners also have a unique opportunity to use the bully pulpit to advocate for certain changes:

- **Post-COVID-19 Lessons Learned** – The pandemic was unprecedented, but so were the actions of the FCC, and the private, and nonprofit sectors. The FCC should bring together key stakeholders across sectors to look at what emergency responses worked well; what responses could be changed and/or adopted more broadly moving forward; and the extent to which adoption efforts fell short as anchor institutions like libraries had to move to virtual support.
- **Workshopping the Universal Service Fund to Enhance Digital Adoption Efforts** – The FCC should host a series of workshops with community groups, educators, Internet service providers and other relevant stakeholders to discuss how to leverage and improve USF programs to support digital adoption efforts. Libraries face challenges in obtaining funding and require outside support to gain access to E-Rate funds. Gathering experts and stakeholders to provide input and assess the effectiveness of current models will help drive change, ensure that the right questions are asked, and ultimately improve opportunities for information exchange and create an environment where new solutions and ideas can be presented and vetted.
- **The FCC as a Digital Adoption (or Inclusion) Agency** – The FCC can bring together industry and community partners to discuss ways to align current library funding resources to support the digital access and adoption lifecycle. The goal is to establish the FCC, in tandem with USAC, as a digital adoption (or inclusion) agency that looks at not only build-out, but also digital adoption and upskilling. Since the FCC has led and participated in the implementation of federal broadband-related programs, the Commission is a strong choice for helping to determine how digital skills training can be incorporated into the mission critical services offered by programs administered through the FCC and its agency partners, which can help improve digital adoption outcomes. The FCC can work with entities such as the Corporation for National and Community Service, NTIA, U.S. Departments of Education and Labor, the Department of the Interior

(including the Bureau of Indian Affairs and its Office of Indian Energy and Economic Development), and the IMLS on ways to better coordinate resources to libraries that support a digital skills lifecycle – from access to adoption.

Beyond government agencies, the FCC should bring together the private sector, nonprofits, and local and state governments that all fund or implement digital skilling efforts in conjunction with libraries to support opportunity communities. Currently, there is little to no coordination among these entities to reach the same communities within the same geography. For example, governments, the private sector, and NGO stakeholders provide funds to libraries and adoption partners, like Girls Who Code; however, the lack of coordination between funders leaves some libraries and partners underfunded and others with a wealth of support. It would be more productive to discourage competition for funds, and instead support the ability to share and scale resources. The FCC can bring together major funders and adoption groups to discuss better ways to coordinate resources to assist more communities. Through this effort, private partners, NGO partners, and public partners (e.g., NTIA), might consider working to develop a digital adoption resource map to ensure resources are properly allocated.

- 7. Revisit Tribal Library Definition and Funding Eligibility** – The current definition of libraries hinges on eligibility for LSTA funds from a state library agency. This is problematic for some tribes as it puts a state library agency in the position of establishing the eligibility of a Tribal library for federal funding – creating issues of jurisdiction and sovereignty that are not always acceptable or workable for some tribes and states.<sup>2</sup> Additionally, it puts decisions regarding Tribal libraries in the hands of stakeholders that do not understand the uniqueness of Tribal libraries. The LSTA has a separate provision for Tribal library services, and the legislation has also been amended to clarify that, by statute, Tribal libraries are eligible for funding from a State Library Administrative Agency. The FCC should reevaluate its own Tribal library funding eligibility in light of the LSTA.

As reported by the ALA, the Commission expressed interest in addressing the “...long-standing issue of tribal library eligibility in the existing E-Rate program in relationship to ensuring that these libraries are fully eligible for funding from the [Emergency Connectivity Fund] ECF.”<sup>3</sup> However, on May 10, 2021, the FCC adopted rules for the distribution of the Emergency Connectivity Fund that did not amend E-Rate rules because the rules remained primarily focused on implementing the Emergency Connectivity Fund.<sup>4</sup>

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<sup>2</sup> Association of Tribal Archives, Libraries, & Museums, *The Disconnect between the FCC’s Schools and Libraries Universal Service Program (E-Rate) and Tribal Libraries*, <https://www.atalm.org/sites/default/files/ATALM%20E-Rate%20Brief.pdf> (last visited May 18, 2021).

<sup>3</sup> Comments of American Library Association, WC Docket No. 21-93, at 3 (Apr. 5, 2021), [https://ecfsapi.fcc.gov/file/10405314108601/ALA\\_ECF\\_Comments\\_04052021.pdf](https://ecfsapi.fcc.gov/file/10405314108601/ALA_ECF_Comments_04052021.pdf).

<sup>4</sup> See *Establishing Emergency Connectivity Fund to Close the Homework Gap*, Report and Order, FCC 21-58, ¶ 25 (May 11, 2021) (“The LSTA was recently amended to make clear that Tribal libraries are eligible for support from a state library administrative agency under LSTA. Consistent with those amendments, and guidance from the Institute of Museum and Library Services, we clarify that Tribal libraries, which are by statute eligible for support from state library administrative agencies under the LSTA, are eligible for support from the Emergency Connectivity Fund.”)

Therefore, the DEI Working Group recommends that the FCC revisit the issue of Tribal library definition and updating E-Rate rules that affect funding eligibility.

Greater collaboration with the IMLS, whose museum and library-funding model has enabled the grant-making institution to support more than 442 Native American tribes,<sup>5</sup> can help provide a glide path as the FCC revisits the federal library definition and works to ensure greater equity for Tribal libraries. Such a change will improve E-Rate eligibility for many Tribal libraries and create new opportunities for funding that can be used to advance digital inclusion efforts in Tribal areas. This action can also incentivize greater collaboration with Tribal leaders and stakeholders – creating new opportunities for the FCC, USAC, and other relevant entities to explore additional ways to collaborate and gather additional inputs from Tribal leaders and relevant stakeholders to enhance USF program outcomes for Tribal libraries and their communities.

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The current E-Rate eligibility rules were adopted long before the LSTA was amended and include a citation to an outdated version of that LSTA. Because this proceeding is focused on the implementation of the Emergency Connectivity Fund, we do not amend the E-Rate rules at this time to reflect the change to the LSTA.”) (internal citations omitted).

<sup>5</sup>Supplemental data supplied by Institute of Museum & Library Services (May 2021). *See also* Institute of Museum & Library Services, *\$1.7 Million in Grants to Strengthen Native American, Native Hawaiian Museum Services: IMLS Funds Projects in Support of Native Heritage and Cultural Preservation* (June 4, 2020), <https://www.imls.gov/news/17-million-grants-strengthen-native-american-native-hawaiian-museum-services>.