**BEFORE THE**

**FEDERAL COMMUNICATIONS COMMISSION**

**WASHINGTON, DC 20554**

In the Matter of )

Affordable Connectivity Program ) WC Docket No. 21-450

)

COMMENTS OF ALLVANZA, THE MULTICULTRAL MEDIA TELECOM AND INTERNET COUNCIL (MMTC), OCA-ASIAN PACIFIC AMERICAN ADVOCATES AND LGBT TECHNOLOGY PARTNERSHIP

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December 20, 2021

**COMMENTS OF ALLVANZA, THE MULTICULTRAL MEDIA TELECOM AND INTERNET COUNCIL (MMTC), OCA-ASIAN PACIFIC AMERICAN ADVOCATES AND LGBT TECHNOLOGY PARTNERSHIP**

ALLvanza, The Multicultural Media, Telecom and Internet Council (MMTC), OCA-Asian Pacific American Advocates and LGBT Technology Partnership respectfully submit these comments in response to the Federal Communications Commission’s request for comment (Public Notice) on the Affordable Connectivity Program (ACP). As described in the recently affirmed Infrastructure Investment and Jobs Act (IIJA), the Commission is tasked by Congress with the critical responsibility of reinforcing the capacities of Emergency Broadband Benefit Program (EBB) and establishing a migration process toward the Affordable Connectivity Program (ACP), a permanent successor program.

For decades, our organizations have collectively fought for equal access and representation of all people, regardless of sexual orientation and gender identity and economic background, in tech, media, and telecommunications through opportunity creation, awareness building, and advocacy. Central to this fight is bridging the digital divide by ensuring that people across the country, particularly among underserved and minority members of our communities, have access to the Internet in our innovation and technology-based society. We believe that the federal government has a unique opportunity to further this effort with the ACP program. If executed carefully, the ACP can become a major catalyst for ensuring affordable, accessible and reliable broadband for all.

The current Emergency Broadband Benefit provides 8.5 million households[[1]](#footnote-1) a vital lifeline to the Internet. It has been a positive resource for so many over the last 18 months as many segments of the population adapted to online lifestyles on a more regular basis; all of which certainly includes engaging with school, work, connection with loved ones, and much more. The ease of this transition has been disproportionately challenging for many underserved communities and individuals who lack continuity of affordable Internet service. Now, as the Commission aims to install a more sustainable framework through the ACP, we urge the Commission to learn from both the strengths and weaknesses of EBB. All things considered, we encourage the Commission to focus on the following in the midst of implementation:

Primarily, we emphasize that the ACP requires a genuinely manageable timeline for transition and implementation. This is important for both consumers and providers to be aware of the expectations for optimal levels of service and connection continuity, and meet the relevant objectives under reasonable deadlines. For providers in particular, it allows enough time to set systems up and ensure they work efficiently to avoid causing confusion for those enrolled in the ACP.

Further, for fostering usage clarity, we observe demonstrable benefits through migrating enrollees from EBB to the ACP under an auto-enrollment method as opposed to alternative processes. Opt-in has historically presented greater risks of users losing connection for reasons that are unknown to them. While providers should be held to applying the ACP provisions to all plans that are currently offered in EBB to potential customers, providers should be enabled flexibility with navigating separate plans that are considered to be “grandfathered” within the system. Once enrolled, consumers should have the option to assess their service capacity and decide if they want to change providers, which ultimately allows for greater transparency and choice in the marketplace.

While 8.5 million EBB enrollees represents significant usage, there are still many more eligible and likely interested individuals that have not yet enrolled – often due to simple lack of awareness. Through our work, we have seen this first hand and we cannot allow such problems to persist. We believe the Commission can enhance the value of its work by earnestly seeking to develop closer relationships with non-profit organizations and cultural advocacy groups to build awareness of the ACP’s provisions, drive adoption, and establish a robust feedback loop among current and prospective enrollees and the Commission. This will be instrumental in helping the Commission to be responsive to elements of administering the program in a timely manner and better understanding how the program may be enhanced. For our part, our collective organizations will strive to facilitate greater awareness and education related to the ACP and its enrollment rules and processes.

The ACP provides an unprecedented funding framework and a historic opportunity to connect those who have struggled at the fringes of our technology-driven world. However, to reach the ACP’s full potential, we must ensure heightened transparency around the benefits, ease of access for both users and providers and, most importantly, promote awareness around this opportunity. For far too long, many segments of the population have struggled with connectivity and digital literacy deficits and the Commission should recognize how high the stakes are with this transition.

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_\_

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1. <https://www.usac.org/about/emergency-broadband-benefit-program/emergency-broadband-benefit-program-enrollments-and-claims-tracker/#total-enrolled> [↑](#footnote-ref-1)