

April 19, 2023

Marlene H. Dortch
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Implementing the Infrastructure Investment and Jobs Act: Prevention and Elimination of Digital Discrimination, GN Docket No. 22-69, Notice of Proposed Rulemaking, FCC 22-98

Ms. Dortch:

Our coalition of stakeholders representing underserved communities appreciates the opportunity to offer reply comments on the Commission's open proceeding regarding the Prevention and Elimination of Digital Discrimination – GN Docket No. 22-69.

Our diverse group of advocates suggest numerous ways the Commission can best go about helping “facilitate equal access to broadband” and preventing digital redlining in underserved communities. Most notably, we suggest:

1. **Partnering with internet service providers** to offer discounted or subsidized plans for low-income families.
2. **Providing culturally relevant digital literacy trainings** and workshops on basic computer skills, internet safety, and online resources.
3. **Equipping schools in underserved areas** with technology and digital resources to offer after-school technology programs.

Connecting all Americans to affordable, high-speed internet is a bipartisan commitment. From our coalition's perspective, we were concerned to see that various docket filings strayed from this bipartisan commitment and instead called for increased regulation over the broadband space.

While we may not always see eye-to-eye on how best to close the digital divide, stakeholders and policymakers agree that broadband access, affordability, and adoption are the three primary pillars standing in the way of reaching our shared goal of connecting all Americans.

By bringing more Americans online, our nation has a real chance to enhance the lives of so many individuals – including many in vulnerable communities – who have been left on the wrong side of the digital divide for far too long. Underserved communities cannot wait to gain the skills and tools required to unlock the power of the internet and innovation, and **increased regulations will be counterproductive to our efforts – leaving underserved communities on the wrong side of the digital divide for longer.**

Over the past year, our organizations – most notably ALLvanza, LGBT Tech, U.S. Black Chambers and the National Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship – have worked tirelessly to educate households on the federally-funded Affordable Connectivity Program (ACP). This program has been instrumental in providing over 16 million families with \$30 off their

internet bill. Going forward, our coalition will continue advocating for renewing funding for the ACP, since without stable telecommunications subsidy support, many members of vulnerable communities will struggle to sustain access to broadband internet and the resources and services it enables.

While our efforts to promote internet affordability and education in underserved communities have paid off, we now must tackle the adoption piece of the broadband equation. As NTIA and the Commission embark on a bold internet for all agenda, it is crucial that we don't lose sight of the digital literacy programs that educate individuals – including many non-English speakers – on how to use the internet and digital technologies safely and effectively.

One way to accomplish this aim is by **cultivating partnerships with community organizations, universities, and businesses** to provide training, equipment, and other resources to underserved communities through public awareness campaigns and more.

Ensuring every piece of the broadband equation is accounted for will be challenging, and **progress can come to a screeching halt if incentives and smart regulations are at odds with each other**. It is worth noting that a light-touch regulatory model has worked well and helped created a level playing field and healthy competition across America's broadband ecosystem.

To protect consumers from predatory practices, we believe in establishing clear and enforceable standards for service quality. We also caution against imposing overregulation that would create new barriers to entry for small and emerging broadband providers, many of whom are eager to offer consumers new choices in underserved areas but lack the technical resources to comply with complex regulations.

We believe a balanced approach that incorporates both incentives and smart regulations is the most effective way to achieve our broadband goals while also minimizing potential drawbacks. We appreciate the chance to provide additional comments on this important proceeding, and we look forward to working with the Commission to fulfill our nation's bold connectivity mission.

Sincerely,

Rosa Mendoza, President and CEO, ALLvanza

Ron Busby, President, U.S. Black Chambers

Chris Wood, Executive Director & Co-Founder, LGBT Tech

Sarah Haque, Sr. Policy Associate, National Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship