

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Advancing Broadband Availability through Digital Literacy Training)	WC Docket No. 12-23
)	

**Comments of the
Washington State Council on Digital Inclusion and the
City of Seattle**

On behalf of the Washington State Council on Digital Inclusion and the City of Seattle, we respectfully submit the following comments in response to the Federal Communications Commission’s Further Notice of Proposed Rule Making

The Washington State Council on Digital Inclusion (CoDI) recommends strategies, deployment of best practices, and research among public computing centers, non-profit human service, and workforce development agencies, broadband providers, educational institutions, state and local governments, the state library, and the justice system. The Council is supported by the EdLab Group Foundation, as part of the Communities Connect Network Project (CCNP) See www.communitiesconnect.org for more information. EdLab Group Foundation is a Broadband Technology Opportunities Program (BTOP) grant recipient supporting the work of 35 public computing centers located in urban and rural areas across Washington State. The City of Seattle is a founding member of the Council on Digital Inclusion. The City has operated a Community Technology Program since 1997 and is a leader in the digital inclusion field. See www.seattle.gov/tech.

All participants in the CoDI are committed to broadband adoption and digital inclusion. However, there are divergent views, particularly among broadband companies, about how to fund these programs. Thus, these comments do not necessarily represent the position of all participants of the CoDI. However, they do reflect our combined expertise in delivering and evaluating digital literacy services. This includes a close partnership in program evaluation with the University of Washington Information School, who is also a founding member of the CoDI.

Summary

We support the Federal Communications Commission's (FCC) desire to use savings from the Lifeline Program/Universal Services Fund to support programs and services to improve digital literacy and broadband adoption among Americans who face barriers to benefitting from these technologies. These programs and services include the proposed digital literacy program and the broadband pilot program.

Our expertise is in the area of digital inclusion: delivering public access computing, providing digital literacy training and evaluation, program management, and in supporting the partnerships, staff training, and dissemination of best practices necessary for successful programs. Through our combined efforts, we see evidence that support for public access computing, digital literacy services, and low-cost broadband for low-income residents increases meaningful adoption of broadband technology and enables economic participation, improves public safety and health, and enhances pursuit of educational opportunities and civic engagement. The communications and economic strengths of the networks also grow exponentially as new broadband users are added.

Key Positions

Our comments focus on these positions:

1. Community based non-profit organizations and local governments' service providers should be eligible organizations in addition to schools and libraries.
2. Existing digital literacy training providers and communities should be encouraged, not barred from participating in the proposed digital literacy program.
3. Identification of specific needs and responsive digital literacy programs are best done at community level and the FCC should support this approach to the extent possible.
4. We strongly encourage the FCC to partner with the current National Telecommunications and Information Administration's BTOP program staff to plan and implement the broadband pilot and digital literacy programs. This approach will leverage existing expertise within the federal government and previously developed learning resources.
5. We support FCC funding of digital literacy and encourage the Commission to consider other sustainable strategies, funding sources, and incentives for industry partnerships to enable broadband adoption and digital inclusion that do not reduce funding for existing voice and broadband programs.
6. The proposed funding of \$10,500 per site is valuable, but will have limited impact and does not recognize all of the costs necessary to provide effective services.
7. Funds should be set aside for overall program evaluation, technical assistance, and sustainability planning. Each grantee should be required to include and fund evaluation activities to prove impact.
8. Community match requirements should be moderate (up to 25%) and allow in-kind contributions; providers and educators already face significant hurdles in sustaining digital literacy and community service programs. This may be particularly true for rural areas, tribes, and smaller organizations.

9. The FCC should support sharing of best practices and training in delivery of digital literacy. This should be accomplished through the following activities in the grant program and by the FCC, in partnership with other federal agencies:
 - a) Support training of trainers;
 - b) Support sustainability of DigitalLiteracy.gov, working in conjunction with regional best practice portals like Washington’s CommunitiesConnect.org, California’s CTNBayArea.org, and Ohio’s ConnectCommunity.org.;
 - c) Support a national digital literacy and public computing center mapping project, fed by state and local data collection. (See www.communitiesconnect.org/network-directory);
 - d) Implement the Digital Literacy Corps called for in the National Broadband Plan. Work with AmeriCorps to identify national and state opportunities to foster digital corps members.

10. We support the American Libraries Association position that money should not be taken away from E-rate for this effort.
11. The broadband pilot should involve more than one tribal land.
12. In the pilot, new digital literacy providers should be strongly encouraged to partner with existing digital literacy providers who have expertise to contribute to the projects.

The FCC should build on what has been begun by the Broadband Technology Opportunity Program (BTOP) currently underway and administered by the National Telecommunications and Information Administration (NTIA). In the two years of BTOP, considerable progress has been made, but many projects are not yet complete and producing full results. The FCC would benefit by enabling additional progress and leveraging the infrastructure that has already been put into place through this program.

Specific Questions	Position
<p>Should funding for digital literacy be focused on training classes or guidance that may be provided by librarians and others. ¶ 426</p>	<p><i>The FCC should support an open application approach which allows and encourages program design best suited to the users. Identification of specific needs and responsive digital literacy programs is best done at community level, as different populations require different levels of support.</i></p> <p>Both training classes and one-on-one help are important services for digital literacy learners (see Section 6.4 in the Opportunity for All report at http://impact.ischool.washington.edu/documents/OPP4ALL_FinalReport.pdf). However, for early learners, facilitated help and personalized tutoring is critical for overcoming initial fears and gaining sufficient confidence and skills to be able to participate in class-based training.</p> <p>Because the population being targeted will have a variety of skill levels, the most effective use of funding would address both types of training</p>

	<p>needs and provide for facilitated help for new users, and class-based training for those sufficiently prepared to benefit from it. An example of this approach is demonstrated in the Tutor Facilitated Digital Literacy Acquisition project being conducted through Portland State University (http://www.learnerweb.org/infosite/), funded through the Institute for Museum and Library Services.</p> <p>There is also a need to enable a combination of instruction and practice or applied project time to ensure sufficient learning adoption. For some populations, shorter workshops may be most accessible due to child care or work requirements. Some students may need individual attention beyond one-on-one training; peer mentors can be an effective teaching approach (e.g. Seattle Seniors Training Seniors in technology program. http://www.seattle.gov/humanservices/seniorsdisabled/mosc/training.htm)</p> <p>Teachers and facilitators, librarians and community technology center staff must receive more effective instruction on effective pedagogical approaches to meet the needs of potential users. Such train-the-trainer programs would best be facilitated through collaborative networks or library consortia.</p>
<p>What types of entities (libraries, schools, community centers, etc.) should be eligible to receive digital literacy training funds? ¶ 428 Should funding be allocated by type of entity? ¶ 438</p>	<p><i>Community based non-profit and local governments service providers should be eligible organizations in addition to schools and libraries.</i></p> <p>Schools and libraries are critical anchor institutions in the effort for digital inclusion. However, there are many local government and community based non-profits, ranging from senior centers, disability service providers, public community centers, or public housing facilities, YMCA's, and ethnic community service centers that have trusted relationships with low-income vulnerable residents and are offering complementary social and educational services. Some of these organizations are already providing digital literacy services and should be included. This approach will also best leverage additional resources a community can provide.</p> <p>Funding should be awarded on the quality of the proposed program to deliver services, not by type of organization.</p>
<p>Should funds be limited to entities:</p> <ul style="list-style-type: none"> • That do not already offer formal digital training services? • That already offers formal digital training services? 	<p><i>Funds should go to current digital literacy providers and to those who don't provide digital training now if they partner with expertise, or can demonstrate sufficient capacity.</i></p> <p>The distribution of funding should be based on the likelihood of sustainability and impact. In general entities that are already offering digital literacy services are better situated than those that would have a steeper learning curve or would need to invest in infrastructure. Those without digital literacy programs should be encouraged to partner with those who do in order to ensure use of best practices and prevent</p>

<ul style="list-style-type: none"> • Both? ¶ 430 	<p>having to re-invent curriculum and evaluation practices.</p> <p>Good candidates for training providers would possess these traits: experience delivering training and working with vulnerable populations, cultural competency, educational program background, proven community outreach experience, track record offering consistent services, community marketing capacity, sufficient technology capacity and support, student tracking and evaluation capacity, administrative support, welcoming facility, and partnerships to leverage skills or resources.</p>
<p>Should funds be limited to communities that are not already served by digital literacy programs? ¶ 430</p> <p>Would such a policy punish communities that are already making sacrifices? Already doing a great job?</p>	<p><i>Funds should not be limited to communities that are not already served by digital literacy programs.</i></p> <p>Funds should be awarded based on proposals to serve the vulnerable and underserved residents as identified by the FCC and other studies. The FCC should be aware of a balance of awards as a consideration in final awarding. However limiting awards to those without programs would deny leveraging current effective work, exclude further servicing the concentration of currently low adopters in urban population centers, and risk limiting potential partnerships between new communities and those with existing programs. Some smaller communities being served now also have high-need populations and barriers.</p> <p>Limiting funding to communities without current services would also require the FCC to define the size and parameters of those communities not served. For instance, almost all communities in the United States have a public library that offers digital inclusion activities.</p> <p>In addition to funding digital literacy programs at the local level, some funds should go to supporting local/regional best practices & information sharing networks, which help link new community practitioners with experienced ones. The goal is to reach deeper into low adopting communities and to ensure that those efforts are sustained.</p>
<p>Should funds target specific groups?</p> <ul style="list-style-type: none"> • Elderly • Disabled • Bilingual • Tribal • Non-English speaking <p>Who are the most underserved?</p> <ul style="list-style-type: none"> • Where would we get the most 	<p><i>Funds should not target specific groups; rather, local programs should be allowed to submit their own proposals identifying populations of need in their community to encourage diversity in the groups served.</i></p> <p>The elderly, disabled, low-income, low educated, limited English-speaking, and tribal members are all worthy populations that need broadband and digital literacy skills. Through BTOP funding, the Communities Connect Network Project supports these groups, as well as low-income and unemployed, youth, and other groups that require digital literacy instruction and access to broadband technology. Many of our providers serve multiple groups.</p> <p>All of these groups might have the highest need in any given community</p>

<p>benefit per \$?</p> <ul style="list-style-type: none"> Rural ¶ 431 	<p>and would benefit from the investment in additional digital literacy training programs. Supporting multiple vulnerable populations widens the funding’s reach and scope, creating greater impact by serving a larger number of populations in need.</p>
<p>Should there be a local match and, if so, what should it be? ¶ 440</p>	<p><i>The City of Seattle and the Communities Connect Network Project supports a local match of 25%, though the FCC may want to consider a waiver for rural, smaller or limited income groups to participate.</i></p> <p>Eligible match should be broad and recognize volunteer time and other in-kind contributions. The FCC could look at the BTOP program for eligible expenses, or the City of Seattle Community Technology Program could provide a list of eligible expenses used for their Technology Matching Fund grant program (seattle.gov/tech/tmf).</p> <p>We encourage the FCC to consider that many education and community service providers are already operating with very limited funding. A greater match could create a barrier to entry or cost a program more in administrative costs that could be channeled to direct service. There may be a greater challenge to raise higher match in some rural and tribal areas with a more limited pool of resources.</p>
<p>Should we consider funding programs focused on particular digital literacy skills, e.g., job searching, e-government services, or financial services? ¶ 432</p> <p>Is it possible to say where the greatest benefit lies?</p> <p>Is it possible to address that in a focused class?</p>	<p><i>It would be best to allow a range of digital literacy skill program proposals and track how these are applied.</i></p> <p>Work, education, finance, health, civic engagement and access to essential services, and Internet safety are all essential skills for broadband users. The particular content areas for digital literacy skills instruction should be based on local needs, assessment, and capacity. Many programs integrate multiple skill areas most relevant to the population served. For adults to learn new digital literacy skills the program focus needs to be relevant to them personally and this will vary from community to community. In a community where the most underserved are elderly, for example, digital literacy programs may be most effective by focusing on health information seeking, social inclusion uses, and small business development. In another area where there are impoverished adult working poor, it may make more sense to focus on life skills like financial management, or employment skills and job seeking.</p> <p>What is important is that projects involve an applied use of skills (project based learning) relevant to the target audience needs, but this varies by user and is often multivariate. (See the City of Seattle Technology Matching Fund Grant Progress Report Form as an example of how this is tracked. http://www.seattle.gov/tech/tmf/docs/Seattle_TMF_Progress_Report_Form_sample.pdf)</p> <p>The grant program should encourage, in its selection criteria points, any</p>

	<p>applicant that includes training in using government online programs. Consumer and legal education and PC/Internet safety and security should also be encouraged for all projects.</p>
<p>Would a \$50 million in annual funding over a four year period appropriately balance the goal of advancing digital literacy for Americas that lack such skills with minimizing the USF contribution burden on consumers and businesses? ¶ 434</p>	<p><i>The proposed \$50 million is a very important investment, and also encourage the commission to look at additional strategies for funding digital literacy.</i></p> <p>We support taking savings from the Lifeline/Link Up programs and using that for broadband adoption, though our constituents also have concern over the impact on low-income residents as a result of eliminating the LinkUp program on non-tribal lands.</p> <p>The American Recovery and Reinvestment Act BTOP fund for public computing was \$200 million, for broadband adoption \$250 million, and the Department of Education’s former Community Technology Program grant program was at \$250 million per year. We encourage the commission to consider other sustainable strategies, funding sources, and incentives for industry partnerships to enable broadband adoption and digital inclusion that do not reduce funding for existing voice and broadband programs.</p> <p>We acknowledge the important work of the Commission to date and encourage the steps which could include the following:</p> <ol style="list-style-type: none"> 1) Encourage and incentivize multi-stakeholder partnerships. 2) Support partnerships between public, non-profit, and commercial organizations. 3) Look at other potential FCC funding mechanisms for sustainability (e.g. a fee on initial purchase of FCC licensed equipment, a portion of fines or settlements, or a portion of spectrum revenue). This would in effect be a reinvestment fund, using technology and telecommunications revenue to teach people to use and buy the products that technology and telecommunications companies are selling. 4) Enable and encourage state and local governments to negotiate partnerships and franchise terms which support digital literacy and access goals. 5) Support state and federal Councils on Digital Inclusion, similar to Washington state’s CoDI, in order to continue coordination, development and sharing of best practices in broadband adoption, digital literacy and access.
<p>Would a \$15,000 annual program budget per entity (\$15,000 yr/ \$30 hr=500 hrs) be sufficient to support</p>	<p><i>\$15,000/year is enough only for a very limited part time program and is inadequate for lasting program effectiveness. Awards need to allow for the full cost of program implementation.</i></p> <p>The FCC should also consider supporting multiple year funding of</p>

<p>a digital literacy training program? ¶ 440</p> <p>See also ¶ 436, What costs should be supported?</p>	<p>entities to enable stronger program building and impact tracking.</p> <p>The following costs, referenced in ¶ 436, should be allowable: labor costs for trainers, staff training for trainers, curriculum development, software and materials, marketing, volunteer recruitment, and administrative costs). Other very real and allowable costs should include:</p> <ul style="list-style-type: none"> • Technical support for equipment and software • Internet service • Ongoing equipment replacement costs • Hardware (examples: projector, video conferencing, assistive technology for users with disabilities) • Evaluation costs (examples: staff hours, consultants) • Staff development and time required for partnership development • Volunteer and internship program management • Data tracking, evaluation, and grant reporting • Facilities (additional utilities, maintenance) • Transportation for rural programs
<p>¶ 427</p> <p>Producing a sustainable impact, fostering development of curricula and training skills, Is funding digital literacy training an effective way to help close the digital literacy gap and thereby increase demand for and the availability of broadband to low-income consumers and others.</p> <p>How to ensure non-adopters are aware of and can access the training programs.</p> <p>Ways to utilize expertise of other government agencies, groups or organizations.</p>	<p><i>We support digital literacy training as an effective way to close the gap and thereby increase demand for and availability of broadband for low-income consumers. However, this should be coupled with other ongoing efforts to enable provision of low cost broadband services for low-income families.</i></p> <p><i>The grant program management can be designed to ensure digital literacy programs include outreach and marketing.</i></p> <p>To ensure that non-adopters targeted are aware of and can access digital literacy training programs that are established as a result of the FCC funding, there should be grant program application questions and criteria that address the applicant’s previous experience in working with the target population as well as information about the applicants’ method and experience conducting community marketing and outreach.</p> <p><i>Program management by the NTIA staff or in close cooperation would help leverage previous experience and expertise in targeting digital literacy training, and support best practices exchange.</i></p> <p>The NTIA staff has years of experience and vital in-depth expertise in grant making in this area, providing technical assistance, and supporting best practices in digital literacy.</p> <p>The FCC should also allocate a portion of funds to enable in-person and online national and state exchange of best practices and curriculum, as the NTIA has been promoting. We further encourage funding support for national and state digital inclusion councils. Our members would be happy to serve on an advisory panel for the FCC as well.</p>

