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February 16, 2021

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L St. N.E.  
Washington, DC 20554

**Re: Reply Comments of the Multicultural Media Telecom and Internet Council (MMTC)  
in the Emergency Broadband Benefit Proceeding, WC Docket 20-445**

Dear Ms. Dortch:

As shared in our previous public Comment submitted on January 25, 2021, the following is a summary of Comments and recommendations of the Multicultural Media, Telecom and Internet Council (MMTC), filed in the Emergency Broadband Benefit proceeding in collaboration with the National Urban League (NUL)  
([https://ecfsapi.fcc.gov/file/10126823710334/MMTC\\_NUL%20EBB%20Comments.pdf](https://ecfsapi.fcc.gov/file/10126823710334/MMTC_NUL%20EBB%20Comments.pdf)).

**Summary of FCC Comments on the EBB filed by MMTC and NUL on January 25, 2021:**

1. The Commission Can Take Important Steps to Maximize the Value of EBB Support and Thereby Reduce the Digital Divide:
  - a. The Commission Should Define EBB Eligibility Broadly to Maximize Participation by Low-Income Persons and People of Color
  - b. The Commission Should Promote Access to Robust Broadband Services That Are Fully Capable of Meeting the Needs of Low-Income Households
  - c. Participating Broadband Providers Should Be Approved on a Streamlined Basis and Should Be Required to Promote the Availability of EBB Support.
2. The Commission Should Promote Transparency and Accountability to Ensure That Participating Households Understand When Benefits Will Be Depleted and So Program Benefits Can Be Effectively Evaluated
3. The Commission Should Ensure That Program Oversight Does Not Undermine the Vital Interest in Widespread Participation:
  - a. The Consolidated Appropriations Act and the Commission's Existing Verification Processes from the Lifeline Program Provide Ample Means of Preventing Waste, Fraud, and Abuse
  - b. In All Events, the Commission Cannot Allow Oversight Mechanisms to Undermine the Critical Interest in Maximizing Participation by Eligible Low-Income Households

In addition to the Comments of MMTC and NUL, MMTC would like to supplement the record in this proceeding by providing the following additional recommendations as Reply Comments in this proceeding:

**Summary of MMTC's Recommendations from the FCC's Virtual Public Roundtable**

On Friday, February 12, 2021, MMTC, represented by Dr. Fallon Wilson, Vice President of Policy, participated as a panelist in the FCC's virtual public roundtable on the EBB. MMTC also signed on to be an "Emergency Broadband Benefit Outreach Partner" to help the FCC engage in public outreach and enrollment strategies to ensure that all communities are fully informed of the EBB and that eligible community members enroll in the EBB. On that panel,

MMTC suggested that the FCC adopt a “community-centered mindset” in its outreach efforts and shared the following additional recommendations to ensure effective public outreach, transparency, enrollment, and adoption:

**(1) Permanent Subsidy—FCC Should Ask Congress to Create a Comparable, *Permanent* Government Internet Subsidy to Complement the EBB When It is Depleted**

MMTC fully supports the EBB and believes the Emergency Broadband Benefit program is a great *first step* to ensuring connectivity for our most vulnerable community members. We are pleased to see that the Commission is making every effort to ensure a strong rollout of the Emergency Broadband Benefit program by launching a public website about the program, hosting a roundtable with seminal broadband organizations, and encouraging stakeholders to partner with the FCC to engage in broad community outreach. However, as noted by other panelists at the FCC’s virtual broadband summit, we are concerned about engaging communities to enroll in a program and to take advantage of a monthly subsidy that could run out very soon after communities sign up, based on the limited “emergency” nature of the funding of \$3.2 billion. We believe the Commission must cautiously and intentionally balance the activation and enrollment of community networks with the availability of funds and try to ensure that there is a long-term solution in place once the EBB runs out. For this reason, MMTC believes that the FCC must encourage Congress to act immediately to provide a comparable and *permanent* government internet subsidy to complement the EBB when it is depleted and to ensure all people have access to the internet.

**(2) Maximize Outreach--Ensure the Maximum Outreach to and Participation of Vulnerable Communities by Being Creative and Intentional**

**(a) Create a Public Website Tool in Real Time that Shows the Estimated Amount of EBB funds Used and Remaining**

A “Community-Centered Mindset” would encourage the Commission to create in real time an automated public website that shows how much of the EBB funds have been expended; in this way, community partners can help their communities know when the funds will “likely” be depleted so that they can make informed decisions about their internet access. If the Commission does not do this, then it could prevent people from signing up, afraid that they would be saddled with a bill that they cannot pay.

**(b) Create a Public Website Tool that Helps the Consumer Understand Broadband Speed and Household Size to Help Consumers Understand What Package Works Best for their Household**

As advocates of the EBB, we want informed choice and maximum adoption, and speed matters. The FCC should make sure that consumers are made aware that the EBB can be used not only to purchase the lowest cost broadband option that providers make available to consumers, but the subsidy can be used to enable the consumer to purchase the right level of broadband needed for the household. To help effectuate this, the FCC should take time to create a public website tool that educates community members (e.g., those of us who are doing the outreach) as well as eligible consumers on how different speeds, agnostic of providers, are likely affected by the number of people in households and the number of devices that they have in their household so they can select the right service package for their household. A tool that helps the consumer to select the right level of service needed for one’s household is empowering for the consumer, and it is helpful for us as outreach partners and advocates of the EBB.

**(c) Engage Non-traditional Community Networks, Such as Inter-Faith Religious Community Networks, for “Translation” As Well As for Enrollment**

There is broad support for engaging “community anchor institutions” in outreach for enrollment in the EBB. Faith-based outreach should be included, particularly, for their ability to “translate” value. We talk about access, affordability, and adoption, but we often miss the “translation” conversation; it precedes media literacy, and it is essential to community outreach partners such as MMTC to figure out how to translate this federal program into value for the community. Faith communities and cultural griots of all cultural communities translate big concepts like life and death; they can easily translate the concept of the EBB and its value to the community. In particular, the African American church has been a place to train and organize communities for governmental engagements, such as voting and making democracy real during the Civil Rights Movement. In general, MMTC believes that EBB outreach should happen in four main places: faith

communities, schools, grocery stores, and working with gig economy businesses. Research shows that a majority of Black and Latino communities say religion is important to them. Logically, then, faith-based institutions matter, and any outreach strategy should include them in translation as well as for enrolling eligible consumers in the EBB.

**(d) Leverage Existing Community-Delivery Systems such as School Bus Routes**

Another existing outreach and enrollment mechanisms are school bus routes; specifically, the buses and transportation routes of schools. Many schools that are doing remote learning are now using bus systems to deliver food to families because the students are at home and cannot take advantage of school lunch programs. It would be a great idea if E-Rate funds can be used to help schools use their busing systems to sign people up for the EBB as they deliver food to families who are in need.

**(e) Support Offline Enrollment Strategies with Personal Protection Equipment**

In addition to virtual outreach via TV ads, digital ads, and radio, “Trusted Community Members,” such as those of us who sign on to help the FCC with outreach, will need to engage in offline strategies, such as knocking on doors, or meeting people at their church or nonprofit parking lots. Trusted Community Members who agree to these offline outreach strategies will need access to Personal Protection Equipment (PPE) to do this. So, funding and delivery of PPE will need to be a part of the offline outreach.

**(f) Fix the Lifeline National Verifier**

To ensure the best user experience, the FCC must ensure that the Lifeline National Verifier front-end user experience is accessible, and that the back-end user experience is informative. This means the Commission should make every effort to help communities understand the purpose of the National Verifier, and it should be an easy tool to check eligibility. In fact, the Commission should be able to extract data from the National Verifier to understand, in real time, which communities are meeting eligibility requirements and which communities are being denied eligibility. This means the Commission should make every effort to fix the issues outlined in the recent January 2021 United States Government Accountability Office study, *"FCC Has Implemented the Lifeline National Verifier but Should Improve Consumer Awareness and Experience."*

Respectfully submitted:

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