

Connect Your Community 2.0

Digital Literacy and Access For All
Our Neighbors and Neighborhoods



August 31, 2015

Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Second Further Notice of Proposed Rulemaking in the Matter of Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42; Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197; and Connect America Fund, WC Docket No. 10-90

Dear Chairman Wheeler,

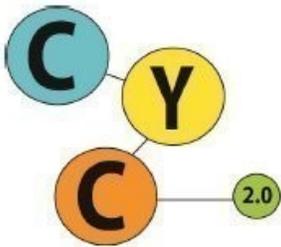
Thank you for the opportunity to comment in this proceeding.

Connect Your Community 2.0 (CYC 2.0) is a collaborative of nonprofit organizations in greater Cleveland and Detroit which have conducted a number of community-based initiatives to reduce our communities' persistent digital divide over the past decade. Among those initiatives was a major Sustainable Broadband Adoption project funded by the Department of Commerce's Broadband Technology Opportunities Program from 2010 to 2013 – called the “Connect Your Community Project” – which provided digital literacy training to more than 15,000 low-income adult residents of Greater Cleveland and Detroit, and enabled more than 11,000 of those residents to become new home broadband subscribers. Information about CYC 2.0 including our partners and current projects, along with program information, research reports, curricula and other material from the original BTOP-supported Connect Your Community Project, can be found at <http://connectyourcommunity.org>.

CYC 2.0 is an affiliate of the National Digital Inclusion Alliance (NDIA). We contributed to and strongly support the comments filed by NDIA Executive Director Angela Siefer in this proceeding. In particular, we would like to express our agreement with NDIA's comments on paragraphs 17 and 27 of the Notice.

The purpose of this letter, however, is simply to reiterate CYC 2.0's strong support for Commission action to create a robust Lifeline broadband option, and the urgency of expanding affordable home broadband access in our particular local communities.

Our core cities, Cleveland and Detroit, are two of the nation's worst-connected in terms of household Internet access. According to data from the U.S. Census' most recent American Community Survey, more than a third of all households in Cleveland and Detroit still had no home Internet access of any kind in 2013 -- not even mobile or dialup. For households with incomes below \$20,000 the



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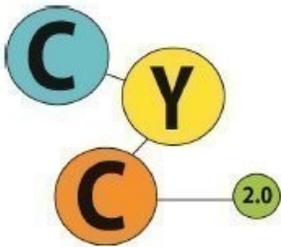
“disconnected” percentage was above 50% -- again, with no home Internet access of any kind

This is an obstacle not just for the households themselves, but for our local government, healthcare, education, banking, human services and civic-sector institutions which increasingly need to engage online with all of their constituents, customers and clients. We'd like to call the Commission's attention to several areas not mentioned in the Notice in which a robust Lifeline broadband option would fill serious gaps for our communities:

- As discussed in NDIA's comments on paragraph 27 of the Notice, hospital systems and community health centers serving our cities face increasingly challenging “meaningful use” targets for Patient Health Record adoption and use by Medicaid and low-income Medicare patients who are the least likely of our citizens to have (or know how to use) Internet access. CYC 2.0 partners in both Cleveland and Detroit have met with local hospital representatives to explore collaborations on low-income PHR adoption, and Cleveland's Ashbury Senior Computer Community Center is currently conducting a pilot MyChart training program in cooperation with MetroHealth, the county safety-net hospital, and the Center for Health Care Research and Policy. But these efforts have been hobbled by the absence of local, affordable broadband options, especially for older residents.
- Recent changes in the national General Education Degree testing and training process have left adult students who need GED certificates but lack computer skills virtually stranded. This is an enormous problem in Cleveland and Detroit, each of which counts large proportions of non-high school graduates in its low-income workforce.

CYC 2.0 partner Seeds of Literacy is an adult literacy program providing basic education and GED preparation free of charge to people in greater Cleveland. To quote the organization's program director, Dan McLaughlin: *“Because the GED examination is now offered only by computer, our students must be comfortable with online operations to take it successfully. Since the majority of our students are low-income... digital illiteracy and the cost of broadband are often significant barriers to their success. An opportunity for truly affordable high-speed Internet access through the Lifeline program could go a long way toward removing those barriers.”*

- Households receiving or seeking SNAP, Medicaid, TANF-funded cash assistance or unemployment benefits from the State of Ohio are under increasing pressure to file applications, reports and redetermination requests on line, as well as to carry out and document their job search and work requirements using State websites including a version of Monster.com called OhioMeansJobs.com. Of course moving these functions online should mean greater convenience and better access for clients, as well as efficiencies and management benefits for the State and County. But these benefits currently can't be realized for the majority of low-



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income households in Cleveland because they lack home Internet access.

These examples illustrate the degree to which gaps in affordable broadband access and the skills to use it, affecting large numbers of Cleveland and Detroit's low income residents, are starting to inflict significant costs, not just on the residents themselves but on community institutions trying to serve them.

The Commission can significantly reduce these costs through decisions in this proceeding to:

- a) enable all low-income Cleveland and Detroit households to secure truly affordable, robust broadband Internet access through the Lifeline program, and
- b) take responsibility for a coordinated effort to develop resources for community-based training in support of these new broadband users, both through incentives for Lifeline broadband providers and through leadership and collaboration with other concerned Federal agencies.

Thank you.

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