



April 15, 2022

Chair Jessica Rosenworcel
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

RE: Affordable Connectivity Program (WC Docket No. 21–450)

Dear Chair Rosenworcel:

The Local Initiatives Support Corporation (LISC) thanks the Federal Communications Commission (FCC) for the opportunity to provide comments on the [Affordable Connectivity Program](#) to ensure all Americans have access to affordable, reliable, high-speed broadband as authorized by the [Infrastructure Investment and Jobs Act \(Bipartisan Infrastructure Law\)](#). LISC appreciates the FCC's ongoing efforts to advance broadband adoption and affordability and encourages the FCC to continue engagement with stakeholders as rulemaking continues.

Background on LISC

LISC is a nonprofit housing and community organization and certified Community Development Financial Institution (CDFI) with offices in 38 cities throughout the country and a rural network encompassing 45 different states and Puerto Rico. LISC's work supports a wide range of activities, including affordable housing, digital inclusion, economic development, building family wealth and incomes, education, community safety, and community health. LISC mobilizes corporate, government, and philanthropic support to provide local community development and business development organizations with loans, grants, equity investments, capacity building, and technical assistance.

For more than 25 years, [Rural LISC](#) has provided dedicated support to rural communities and today partners with 145 rural community-based organizations in more than 2,200 counties. A key pillar of Rural LISC's community and economic development toolkit is the integration of digital supports and broadband into communities to increase equitable access. Rural LISC, in partnership with 32 community development organizations, operates a national [Digital Navigator program](#) in twenty states across the Appalachia region, the Deep South, the upper Midwest, and the Navajo Nation.

LISC supports digital inclusion initiatives in rural and urban communities to ensure that all individuals and communities can fully participate in our society and economy. We believe that resilient communities necessitate digital inclusion activities that provide affordable, robust broadband internet options, widely available internet-enabled devices and equipment that meet users' needs, and access to digital literacy training and technical support. With four decades of experience investing in communities' social and economic infrastructure, LISC recognizes the promise of the robust digital inclusion

investments afforded by the Bipartisan Infrastructure Law and the role the Affordable Connectivity Program will play in meeting the needs of historically disconnected families and communities.

Specific Comments

LISC is pleased to offer responses to questions posed in the [Federal Register Notice](#) on structuring an outreach grant program and the potential establishment of a pilot program for households participating in Federal Public Housing Assistance Programs. We offer these comments informed by our experience driving financial stability, developing affordable housing, and fostering digital inclusion in partnership with community-based nonprofit organizations in urban, suburban, and rural communities.

LISC understands that there are strong linkages between digital inclusion efforts and socioeconomic outcomes and believes that fostering healthy, resilient communities requires resources that better address longstanding obstacles to broadband adoption. This is particularly important as the digital divide disproportionately impacts rural and low-income areas, particularly communities of color, with [significantly lower](#) broadband adoption rates in majority-Black and majority-Native American counties.

The enactment of the Affordable Connectivity Program under the Bipartisan Infrastructure Law presents a unique opportunity to lessen the digital divide by addressing the affordability barrier, given that many Americans cannot afford broadband services or the devices needed to use it. An analysis by [Pew Research](#) found that of low-income households earning less than \$30,000, 44 percent do not have broadband services, and 46 percent do not have a traditional computer or tablet, with half of the families attributing this to prohibitively expensive monthly costs. In contrast, these are nearly universally adopted by households earning more than \$100,000. As such, for millions of families, internet-based income supports or subsidies are necessary to facilitate broadband adoption.

Outreach Grant Program

Achieving digital equity necessitates robust support of outreach and education efforts. LISC commends the FCC's continued efforts to implement the Affordable Connectivity Program (ACP). We believe that the ACP's strategic implementation will significantly help reduce affordability barriers to broadband adoption and the equitable use of technology. LISC greatly appreciates the leadership of the FCC and the comprehensive approach to developing outreach and pilot programs seeking to significantly increase ACP uptake and the number of federal resources dedicated to closing the digital divide.

LISC strongly supports the FCC in establishing an outreach grant program and believes that these types of investments will help to increase awareness and enrollment for ACP eligible households. An outreach grant program would enhance the provision of this new income support and strengthen the ability of disconnected and cost-burdened families to marshal available resources, particularly among historically marginalized populations. This is a critical step on a path toward addressing racial and geographic disparities and closing the digital divide gap in America.

As a nonprofit intermediary organization, LISC has extensive experience applying for, implementing, and managing Federal contracts and awards. In this capacity, we carry out extensive engagement and partnerships with multiple levels of government and smaller community-based organizations to carry out programs across a range of focus areas and ensure that public sector resources are effectively leveraged. These partnerships are integral to addressing the needs of traditionally underserved low-income urban and rural communities, as comments by [Education Superhighway](#) highlighted.

Successful community outreach efforts require strong local partnerships that leverage trusted community partners. LISC recommends that the FCC consider leveraging existing networks of nonprofit organizations with established track records of supporting underserved communities that employ both primary and subgrantees to deploy outreach grant resources effectively. The needs of communities throughout the United States vary, so Federal grant programs should allow for tiered structures that equip community organizations with flexible resources that aid in responding to local challenges. A national-local design would facilitate the targeted use of funds while maintaining flexibility for community-based organizations to meet their local needs, with backbone organizations providing technical assistance, training, and compliance oversight.

Intermediaries such as LISC are structured to support community-based outreach efforts by bridging the gap between public and private funding and public benefits enrollment. With long-term, established relationships with on-the-ground organizations, intermediaries are uniquely equipped to respond to new opportunities with proven abilities to effectively manage and direct federal resources to the areas where they are most needed. These direct connections give national nonprofits the ability to understand hyperlocal needs and leverage trusted relationships. We agree with the [National Urban League](#)'s comments that leveraging national nonprofit intermediaries would scale the impact of the outreach program by utilizing and building on existing efficiencies and partnerships, and that multi-year grant projects with options to renew would provide stability and encourage participation.

The use of subgrantees would advance the goals of the outreach grant program, and multiple federal programs to date point to this model's effectiveness. We encourage the FCC to consider the Section 4 Capacity Building Program at the Department of Housing and Urban Development and the Community Navigator Pilot Program at the Small Business Administration as impactful subgrantee models. Adopting a similar model would simplify the administration of the model and more equitably allow for resources to be directed to smaller, community-based organizations that may lack the capacity to apply directly and administer federal funds, as comments made by [Tech Goes Home](#) emphasized. An intermediary approach would also facilitate the alignment and leveraging of existing networks to increase financial stability through benefits access. For instance, LISC operates a national network of over 125 Financial Opportunity Centers (FOCs) operating in 32 cities and rural areas across the country that provide employment and career services, financial coaching and education, benefits counseling, and low-cost financial products that build credit, savings, and assets of low-moderate income families. These models emphasize awareness and increase access to public benefits that with additional outreach resources could reach and enroll more ACP eligible households.

LISC offers the following specific advantages of utilizing intermediary networks to deploy the outreach grant program for the FCC's consideration, such as:

- Leverage nationwide networks with trusted relationships that overcome barriers to equity by replacing transactional systems with community-based organizations dedicated to serving historically disadvantaged people and places;
- Capacity to carry out one-on-one technical assistance and capacity building delivery to smaller community organizations to allow for successful implementation and adaptation to evolving community challenges and maximizing enrollment;
- Ability to tailor and specifically uplift priority communities by geography, demographics, business type, size, and other desired metrics while supporting resident leadership;

- Linkage to trusted, culturally competent, and linguistically accessible partners rooted in their communities and also have been demonstrated effectiveness and fiscally sound practices;
- Utilization of existing financial delivery and data tracking systems built to comply with federal regulations standards yet are quick and effectively targeted in managing subgrantees; removing the FCC's burden to manage contracts and collect data from community-based partners;
- Promotion of digital inclusion field-building and convening of local, regional, and national stakeholders to establish and share best practices;
- Build on existing programs serving underserved populations and communities; and
- Strong communications and public relations networks in place to further elevate ACP program awareness and communicate the work through a person and community-centered lens.

We also support the [National Digital Inclusion Alliance](#)'s comments that the FCC should consider nonprofits with 501(c)(3) status as eligible grantees under the program. Applicants should have prior experience relevant to increasing ACP awareness and enrollment.

Pilot Program - Serving Eligible Households Participating in Federal Public Housing Assistance Programs

LISC strongly supports the FCC's consideration of a pilot program focused on expanding ACP participation by Federal Public Housing Assistance (FPHA) Programs beneficiaries. We believe the most impactful action the FCC could take is ensuring that all residents of federally assisted housing receive automatic eligibility for the ACP program. This includes tenants living in traditional public housing, as well as properties with the Department of Housing and Urban Development Section 8 Project-Based Rental Assistance, Section 202 Project Rental Assistance Contracts, Section 811 Project Rental Assistance, and U.S. Department of Agriculture Section 521 Rental Assistance. The current Lifeline program provides automatic eligibility for residents of public housing. However, there isn't clear guidance on private properties with federal project-based rental assistance even though they serve tenants with similar income standards. This inconsistency stymies efforts to enroll eligible residents by creating unnecessary administrative barriers for our nation's lowest-income households.

We recommend that the FCC structure a data-sharing agreement with the Department of Housing and Urban Development (HUD) and the U.S. Department of Agriculture (USDA) to provide automatic eligibility for residents living in properties with federal project-based rental assistance. HUD and USDA already maintain tenant income verification systems, and these should be connected to the current National Verifier income eligibility platform. The FCC should also allow income certifications to occur every three years instead of annually. This practice is common in most HUD project-based rental assistance programs and alleviates tenant and program administrator reporting burden, and is especially important for households on fixed incomes that don't experience sizeable annual income fluctuations.

LISC encourages the FCC to consider allowing for building-wide eligibility in buildings where most tenants receive assistance through a federal project-based rental assistance contract. There is precedent for this since HUD and the U.S. Department of Energy have established building-wide eligibility for the Weatherization Assistance Program. We recommend the FCC and partner federal housing agencies build off this experience.

LISC supports the recommendations of [Stewards of Affordable Housing for the Future](#), which encourage the FCC to allow owners of federally assisted properties to enter into bulk billing agreements with ACP participating internet service providers. Current regulations prohibit such arrangements; however, enabling affordable housing owners to receive ACP support on behalf of tenants would further goals to streamline enrollment and increase adoption rates. Owners could then pair ACP enrollment with building-wide connectivity solutions as a less expensive alternative to retrofitting existing structures.

Federal Public Housing Assistance Program Partnerships

LISC appreciates the FCC's focus on ensuring that FPHA households are aware of and able to access ACP benefits. It is essential to consider partnerships that would elevate the ACP program, given the prior low enrollment of FPHA households in the Emergency Broadband Benefit program. In considering partnerships, the FCC should plug existing gaps in the roles of onsite service coordinators at many affordable housing properties. These service coordinators work to assist residents with various needs regularly and are often connected with local service providers. Despite this critical work, service coordinators tend to have very large caseloads as they typically serve an entire property and may only work part-time due to funding constraints.

These capacity constraints hinder their ability to assist tenants with enrolling and fully utilizing new public benefit opportunities such as the ACP. LISC recommends that the FCC conduct a robust ACP marketing and outreach campaign in various languages that use community-based organizations rooted in serving low-income households. We also recommend allowing owners of affordable housing properties to access ACP outreach grant program resources to support resident service coordinator efforts to enroll residents. This funding, coupled with the above recommendations on streamlined income verification, would ensure that federally assisted affordable rental housing properties have high ACP adoption rates and help close the digital divide.

Lastly, as part of the FCC-HUD pilot, we encourage the FCC to fully utilize all of HUD's outreach tools, including their Community Compass Technical Assistance program. Through Community Compass, HUD can engage and direct third-party providers to make owners and residents aware of the ACP. There is existing experience at HUD with some of this work through its ConnectHome Initiative. LISC recommends that this technical assistance include forming digital equity training programs, creating best practice guides for resident service coordinators, and increasing resident awareness of internet service providers offering discounted device access.

Conclusion

LISC appreciates the opportunity to provide these comments to the FCC and looks forward to continued engagement. Please contact Michelle Harati (mharati@lisc.org), Senior Policy Officer, if you need additional clarification on our recommendations.

Sincerely,



Matt Josephs

Senior Vice President for Policy