

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

In the Matter of)	
EMERGENCY BROADBAND)	WC Docket No. 20-445
CONNECTIVITY FUND)	
ASSISTANCE)	
)	

**REPLY COMMENTS OF
THE CITIES OF LOS ANGELES, CALIFORNIA; CHICAGO, ILLINOIS; PORTLAND,
OREGON; BOSTON, MASSACHUSETTS; WASHINGTON, D.C. AND THE TEXAS
COALITION OF CITIES FOR UTILITY ISSUES**

GERARD LAVERY LEDERER
McKENZIE SCHNELL
BEST & KRIEGER LLP
1800 K Street N.W., Suite 725
Washington, DC 20006
Counsel for the Local Governments
Gerard.Lederer@BBKLaw.com

February 16, 2021

EXECUTIVE SUMMARY

The Cities of Los Angeles, California; Chicago, Illinois; Portland, Oregon; Boston, Massachusetts; Washington, D.C.; and The Texas Coalition of Cities for Utility Issues (“Local Governments”) file these reply comments to:

1. Echo our gratitude to the 116th Congress for creating the \$3.2 billion Program;
2. Repeat our pledge of assistance to the Federal Communications Commission (“Commission” or “FCC”) as it seeks to best develop and execute the Program; and

3. Highlight the numerous parties who agreed with Local Governments’ call for the FCC to:

- Keep the Program simple, with the goal of registering the largest number of eligible households through streamlined enrollment and verification processes;
- Keep the Program simple, with the goal of certifying as eligible as many existing providers, including municipal providers, and municipally sponsored broadband access and bulk purchases as possible;
- Ensure that the Program’s focus is on users’ needs, not the providers’ demands for protection; and
- Invest time, funds, and leadership to publicize the Program as a means to ensure eligible parties are aware of its existence and their eligibility.

TABLE OF CONTENTS

EXECUTIVE SUMMARY	i
I. INTRODUCTION	1
II. FOCUS MUST BE ON FACILITATING AND EXPEDITING SERVICE TO AS MANY ELIGIBLE RECIPIENTS BY AS MANY CERTIFIED PROVIDERS AS POSSIBLE	4
A. Local Governments Can and Want to Assist in Eligibility Verification	5
B. Speed to Stand Up Program and Application Simplicity are Mission Critical.....	5
C. Speed of Service, Including Upload Speeds, Must be An Important Consideration	7
D. Speed and Simplicity Cannot Be Excuse for Mere Pass Through or “Opt In”	8
E. Pricing Must Be Cost Based, Transparent and Not A Marketing Program	10
1. <i>Surrender of privacy rights cannot be a cost of program participation.</i>	11
F. Existing Programs Must Not be Interrupted and Consumers’ Right to Choose their Provider Must Not be Denied.	12
G. Program Should Guarantee Minimum Number of Months of Support	15
III. THERE MUST BE A PLAN FOR TRANSITION WELL BEFORE FUNDING HAS EXPIRED.....	16
A. Funding Balances and Status Reports Must Be Publicly Shared.....	16
B. Obligation to Transition to New Programs.	17
IV. PROGRAM SUCCESS IS CONTINGENT UPON ELIGIBLE PARTIES BEING AWARE OF ITS EXISTENCE	17
A. Providers Should Bear Promotional Obligations.....	18
B. Local Governments Can Be Key in Promoting Awareness of the Program.....	18
V. CONCLUSION.....	19

Before
The Federal Communications Commission
Washington DC

In the Matter of)	
EMERGENCY BROADBAND)	WC Docket No. 20-445
CONNECTIVITY FUND)	
ASSISTANCE)	

**REPLY COMMENTS OF
THE CITIES OF LOS ANGELES, CALIFORNIA; CHICAGO, ILLINOIS; PORTLAND,
OREGON; BOSTON, MASSACHUSETTS; WASHINGTON, D.C. AND THE TEXAS
COALITION OF CITIES FOR UTILITY ISSUES**

I. INTRODUCTION

For the Emergency Broadband Benefit Program (“EBBP” or “Program”)¹ to achieve the vision outlined by Congress, eligible parties must have access to robust upload and download broadband services that can support not only online learning, and potentially at the same time, work from home, telehealth, and telemedicine applications -- connectivity needs that have been highlighted, if not exacerbated in the COVID-19 pandemic. The cities of Los Angeles,

¹ Consolidated Appropriations Act, 2021, H.R. 133, 116th Cong. (2020) (enacted), available at <https://www.congress.gov/bill/116th-congress/house-bill/133/text> (Consolidated Appropriations Act) (enrolled bill).

California;² Chicago, Illinois;³ Portland, Oregon,⁴ Boston, Massachusetts,⁵ Washington, D.C.,⁶ and the Texas Coalition of Cities for Utility Issues⁷ (“Local Governments”) welcome the

² The City of Los Angeles outlined a number of solutions it currently employs to connect its most vulnerable residents to the online services and information they need to thrive. A more detailed explanation can be found in Local Government’s comments. Here are links to two of the programs featured: [GetConnectedLosAngeles.lacity.org](https://getconnectedlosangeles.lacity.org) and [Angeleno Connectivity Trust \(ACT\)](https://angelenoconnectivitytrust.org).

³ Chicago outlined a number of its broadband outreach efforts and sponsored programs in the comment cycle. Primary among these is [Chicago Connected](https://chicagoconnected.org), which is a public-private partnership the City launched to provide high speed internet for approximately 100,000 eligible Chicago Public Schools (CPS) families at no cost to them.

⁴ The City of Portland highlighted its [Digital Equity Action Plan](https://portlandoregon.gov/deap/) (“DEAP”) in the comment cycle. DEAP instituted operational and policy proposals for public and private agencies, along with nonprofits, to bridge the digital divide for excluded members of our community with affordable access, training and tools.

⁵ In the comment cycle, Boston highlighted [Tech Goes Home](https://techgoeshome.org) (“TGH”), what it believes to be the first comprehensive digital inclusion program run by any municipality in the United States. TGH makes available computers, internet access, and training in an effort to ensure students can do homework, adults can find jobs and manage finances, seniors can connect with loved ones, linguistic minorities can learn English remotely, and all can access telehealth.

⁶ Washington, DC was not a party to the comments filed by Local Governments (City of Los Angeles et al. (filed Jan. 25, 2021)), but joins in these reply comments. In addition to these reply comments, the District will submit a standalone letter to supplement the record as to the District’s broadband efforts. That stand-alone filing is also attached hereto Exhibit A.

As reflected in Exhibits A and B, primary among DC’s efforts are [Tech Together DC](https://techtogetherdc.org). This is a values-led partnership between the DC government, the non-profit community, academia, and the industry to bridge the digital divide in our community through access, training, and opportunity. In addition, since September 2020, the District has assisted DC residents meet their remote learning needs through [Internet for All](https://internetforall.org). Internet for All seeks to connect up to 25,000 households with PK3-12th grade students who are enrolled at DC traditional and charter public schools. Families must be eligible for SNAP or TANF benefits. As exemplified by Exhibit B, DC’s input into these comments and the attachment are based on its direct experience with ISPs, Internet for All beneficiaries, and school officials.

⁷ The Texas Coalition of Cities for Utility Issues (“TCCFUI”) is a coalition of more than 50 Texas municipalities dedicated to protecting and supporting the interests of the citizens and cities of Texas with regard to utility issues. The Coalition is comprised of large municipalities and rural villages. TCCFUI monitors the activities of the United States Congress, the Texas Legislature, the Public Utility Commission of Texas, the Texas Railroad Commission, and the Federal Communications Commission on utility issues of importance to cities.

opportunity to file these reply comments in response to the Commission’s Notice in the proceeding.⁸ Local Governments file these reply comments to:

1. Echo our gratitude⁹ to the 116th Congress for creating the \$3.2 billion Program;
2. Repeat our pledge of assistance to the FCC as it seeks to best develop and execute the Program; and
3. Highlight the numerous parties who agreed with Local Governments’ call for the FCC to:
 - Keep the Program simple, with the goal of registering the largest number of eligible households through streamlined enrollment and verification processes;¹⁰
 - Keep the Program simple, with the goal of certifying as eligible as many existing providers, including municipal providers, and municipally sponsored broadband access and bulk purchases as possible;¹¹
 - Ensure that the Program’s focus is on users’ needs, not the providers’ demands for protection;¹² and
 - Invest time, funds, and leadership to publicize the Program as a means to ensure eligible parties are aware of its existence and their eligibility.¹³

⁸ Public Notice, *Wireline Competition Bureau Seeks Comment on Emergency Broadband Connectivity Fund Assistance*, WC Docket No. 20-445 (Jan. 4, 2021) (“Notice”).

⁹ Comments of the City of Los Angeles *et. al* (Jan. 25, 2021) (“Local Government Comments”) at 2.

¹⁰ Local Government Comments at 9-13.

¹¹ Local Government Comments at 5-7.

¹² Local Government Comments at 13-16.

¹³ Local Government Comments at 23-24.

Local Governments will not address that there is a need for such a program as the need is well documented¹⁴ and furthermore is uncontested in the Comment cycle.

II. FOCUS MUST BE ON FACILITATING AND EXPEDITING SERVICE TO AS MANY ELIGIBLE RECIPIENTS BY AS MANY CERTIFIED PROVIDERS AS POSSIBLE

Local Governments were pleased to see that there was almost unanimity in calls for the Commission to act with alacrity in standing up the Program and broad support to keep the program eligibility factors as simple as possible.¹⁵ Local Governments embrace New America's Open Technology Institute's recommendation that the best way to build program participation is to infuse the Program with simplicity and efficiency across all aspects with straightforward marketing, transparent pricing, streamlined application processes, efficient enrollment systems, and minimal bureaucracy for all parties involved.¹⁶

¹⁴ See e.g. Esquivel and Blume, *Tens of thousands of L.A.-area students still need computers or Wi-Fi 6 months into pandemic*, LA Times (Sept. 15, 2020), available at <https://www.latimes.com/california/story/2020-09-15/tens-of-thousands-of-la-county-students-still-need-computers-and-hot-spots-six-months-into-school-closures>; Meghan E. Irons, *Digital divide remains wide for some*, Boston Globe (Jan. 24, 2021), available at <https://www.bostonglobe.com/2021/01/24/metro/digital-divide-remains-wide-some>; Future Ready Schools, "Students of Color Caught in the Homework Gap" (July 2020), available at <https://futureready.org/homework-gap/> (found 16.9 million children—or 8.4 million households—do not have high-speed broadband access at home). The support for such a program was reflected in a recent City of Chicago ballot initiative where 90 percent of Chicagoans supported the City's efforts to ensure broadband access in all communities. See Press Release, Chicago Public Schools (Dec. 4, 2020), available at <https://www.cps.edu/press-releases/chicago-continues-to-bridge-the-digital-divide-by-expanding-eligibility-for-no-cost-high-speed-internet-to-all-low-income-public-school-students-in-the-city/>.

¹⁵ New America's Open Technology Institute Comments at 2; Comcast Comments at 18 ("the Commission should streamline implementation of the program as much as possible, including streamlining the process for allowing non-ETCs to participate and by leveraging existing programs providers have already been offering").

¹⁶ New America's Open Technology Institute Comments at 2. Local Governments further embrace the National Hispanic Media Coalition's ("NHMC") call for participation in the Program to be as "inclusive as possible." NHMC Comments at 5-6 (The NHMC goes on to explain its vision of participant inclusiveness to include to non-citizens, those in the country with

A. Local Governments Can and Want to Assist in Eligibility Verification

Local governments across the nation, including the communities filing these reply comments are actively engaged in sponsoring broadband programs that have served as proxies for the EBBP and other federal benefits until Congress and the FCC could stand up this program. Our housing agencies, our schools, and our health programs are all already documenting eligibility for federal low-income support and we stand ready to assist in verifying parties that qualify for the subsidy.

In its comments, Charter explains how its partnership with local governments currently works in multi dwelling units (“MDU”) that serve low-income households and how that system could serve as a model. “By law, the owner [usually a local government] must certify to the Department of Housing and Urban Development which specific tenants receive assistance and must pass the benefits provided by housing assistance and other programs on to the qualifying households.”¹⁷ The Commission could use this model of local governments certifying MDU residents to qualify for federal housing benefits as a model to qualify eligible parties for the Program.

B. Speed to Stand Up Program and Application Simplicity are Mission Critical

Local Governments align themselves with the various public interest groups, educators, and almost every type of provider that called for speed and simplicity in Program standup.¹⁸ The

temporary status such as Deferred Action for Childhood Arrivals (DACA) participants, people in mixed immigration status families, and those documented through Individual Taxpayer Identification Numbers.). And, the Telecommunications for the Deaf and Hard of Hearing Inc. *et al.* calls for including those who are deaf, hard of hearing, DeafBlind, or deaf with mobility issues. Telecommunications for the Deaf and Hard of Hearing Inc. *et al.* Comments at 2.

¹⁷ Charter Comments at 6.

¹⁸ *See supra* footnote 15.

Benton Institute for Broadband & Society called on the Commission to act with alacrity and make the rules and regulations for both consumer and provider participation “simple, clear, and easy to understand”;¹⁹ while Verizon and others encouraged the Commission to adopt flexible rules to “avoid unnecessarily complicated requirements that would slow implementation.”²⁰ This position was shared by traditional incumbent local exchange carriers and wireless providers who are the bulk of today’s eligible telecommunications carriers (“ETCs”), but it was also a position taken by providers that are not traditionally ETCs such as cable operators²¹ and wireless internet providers.²²

A provider’s eligibility, as defined in the Act, is to be determined by having been designated as an ETC or approved pursuant to a test to be established by the Commission.²³

¹⁹ Benton Institute for Broadband & Society Comments at ii, 4.

²⁰ *See Verizon Ex Parte* at 1; *see also* AT&T Comments at 2, 4 (FCC should “maximize administrative simplicity for eligible households and participating providers, while also preventing fraud and ensuring that consumers receive a substantial product or service for this finite federal benefit.”); NTCA Comments at 17 (FCC should adopt administratively simple rules for provider participation, but also ensure accountability to safeguard the allocation of limited funding.); INCOMPAS Comments at 5, 16 (FCC should allow and encourage competitive alternatives to participate in the program by, among other things, streamlining the application process for non-ETCs to participate.); Competitive Carriers Association Comments at 2 (Given the serious and pressing circumstances and limited-term nature of the program, the Commission should be mindful not to erect unnecessary barriers to participation by broadband providers, particularly by wireless providers that may be able to provide connectivity more quickly and efficiently in many circumstances.).

²¹ Comcast Comments at 18 (Commission should streamline implementation of the program as much as possible, including streamlining the process for allowing non-ETCs to participate and by leveraging existing programs providers have already been offering.); Charter Comments at 3 (Providers should be allowed to “build on the programs” they have already implemented to address the ongoing COVID-19 pandemic that provide discounted broadband service.).

²² WISPA Comments at 2 (FCC should “structure the rules and implement procedures to optimize participation” in the Program.).

²³ Consolidated Appropriations Act, 2021, H.R. 133, div. N, tit. IX, § 904(a)(12), (d)(2). Specifically, the Commission is required to establish an expedited process “to automatically approve as a participating provider a broadband provider that has an established program as of

Congress directed that the EBBP make available funding to support participating providers' provision of certain broadband services and connected devices to qualifying households. It did not focus on fairness to providers. Local Governments are troubled by the number of comments that focus on how the program will treat providers as opposed to offering insights into how best to service eligible recipients.²⁴

C. Speed of Service, Including Upload Speeds, Must be An Important Consideration

Local Governments agree that the Program must be technologically agnostic so that each eligible recipient can use the best form of broadband access for them,²⁵ but upstream and downstream service speeds must be a primary consideration for eligibility. There was very little disagreement on this point, and all seem to agree that 25 Mbps downstream/3 Mbps upstream is not adequate.

- “While some organizations argue that the standard of 25 Mbps downstream and 3 Mbps upstream is adequate for a video conferencing meeting, Los Angeles Unified [School District] has not found this to be true for families using Zoom,

April 1, 2020, that is widely available and offers internet service offerings to eligible households and maintains verification processes that are sufficient to avoid fraud, waste, and abuse.”

²⁴ In an effort to eliminate barriers to participation, Digital Inclusion Network members suggested that consumers be allowed to self-verify their eligibility. And leave it to the USAC to cross check eligibility on the back end to eliminate consumer miss-use. Local Governments were very pleased that Congress made clear in the Act that providers cannot condition participation in the program based on payment of past debts. Local Governments believe that the restriction on past debt should also include a ban on collecting past debts during participation in the Program.

²⁵ The City of Los Angeles employs a fixed wireless provider at its public housing -- [Starry Los Angeles Program](#), but partners with T-Mobile to provide 18,000 students with hotspots. More information on this arrangement is available at <https://www.lamayor.org/Connectivity>.

Webex and other tools critical for distance learning (particularly in households with multiple students and/or multiple families with students).”²⁶

- “With households full of students and workers all needing to simultaneously use video conferencing and other interactivity during the day, an essential component of acceptable internet service levels is the upload speeds. We recommend a minimum service requirement of at least 5 Mbps upload speeds for any service eligible for EBBP subsidy.”²⁷

D. Speed and Simplicity Cannot Be Excuse for Mere Pass Through or “Opt In”

In our comments, Local Governments recommended that any provider that is currently providing a low-cost internet access service either on their own, or as part of a public-private partnership such as Chicago Connected or Tech Goes Home, should automatically be qualified as an eligible provider regardless of their ETC status. We therefore object to parties such as AT&T that call on the Commission to require non-ETCs to wait until the FCC approves their application.²⁸

The Commission should support efforts such as those outlined in the comments Local Governments, and other early adopters and should not punish communities that have looked to defeat the digital divide. Nor should the Commission fall for the pleas to limit the field of providers as some ETCs request in the name of simplification.

²⁶ Los Angeles Unified School District Reply Comments (Feb. 12, 2021) at 2.

²⁷ City of Seattle, Washington *et. al* Comments at 10, 11. The City and its educational partners go on to explain and document their practices of “providing families with wireless hotspots in addition to a wired home connection to help supplement the upload connectivity” but that having multiple providers and connections only adds to program complexity. Seattle therefore recommends “The EBBP ... be used as an opportunity...to incentivize ISPs to place a new focus on providing increased upload speeds.”

²⁸ AT&T Services Comments at 11.

An example of such over simplicity can be found in Verizon’s call for the Universal Service Administrative Company (“USAC”) to modify its national verifier consumer portal to let applicants specify whether they are applying for Lifeline services, the EBBP, or both, and automatically qualify all existing Lifeline customers rather than require them to reapply for the emergency benefit.²⁹ They are not alone in this effort to streamline the process to their market share advantage. AT&T suggests the Commission should allow bundled service offerings to qualify for the program so long as the offering was available December 1, 2020.³⁰ “Most American consumers elect to purchase broadband service bundled with other services, such as voice, and participating providers should have the flexibility to apply the benefit to those offerings.”³¹

While Local Governments have no problem with ETCs offering broadband services, we have at least three problems with this suggestion:

1. Not all states participate in the national verifier and eligible households and individuals in those states must not be injured;³²

²⁹ Verizon Comments at 1-2; *see also* AT&T Comments at 10 (“Since ETCs were already vetted by the state or the FCC, the Commission should clarify that a participating provider that is designated as an ETC in a state is authorized to offer the Emergency Broadband Benefit throughout its fixed or mobile broadband footprint in that state. This will ensure the Program can launch on an expedited basis across a wide geographic scope without sacrificing potential waste, fraud or abuse.”); TracFone Comments at 7-8; National Lifeline Association *Ex Parte* (“NaLa Ex Parte”) at 5.

³⁰ AT&T Comments at 7, 9.

³¹ *Id.* at 7.

³² USAC lists the states of California, Oregon, and Texas and not being part of the national verifier system. National Verifier December 20, 2019 Launch, USAC, *available at* <https://www.usac.org/lifeline/eligibility/national-verifier/launches/national-verifier-opt-out-launch/>.

2. ETCs cannot be allowed to game the system with “tactics that deny their customers a meaningful choice of providers and offerings within EBBP”;³³ and
3. The Commission must ensure that it does not create a program in which providers can game the system “to permit ETCs to extend the emergency broadband benefit to existing Lifeline customers on an “opt-out” basis, without the customer making an affirmative choice to enroll.”³⁴

E. Pricing Must Be Cost Based, Transparent and Not A Marketing Program

The record is clear. Like Local Governments, numerous parties filed in support for the proposition that all EBBP providers must be subject to cost-of-service disclosures.³⁵ Local Governments believe that commenters are united that pricing must be cost-based and transparent such that monthly rental costs include modems and/or Wi-Fi routers and any other equipment that is needed to provide Internet service.

Local Governments further agree with parties that call on the Commission to ensure pricing transparency be built from the start into the architecture of the Program³⁶ so that all will benefit at the Program’s expiration.³⁷ As Next Century Cities notes, such transparency will help

³³ ACA Connects Reply Comments at 2. Local Governments have found pricing of bundles to be opaque. Such bundled pricing could result in the Program being charged a higher rate for broadband services than a competitive marketplace might otherwise offer. For example, if a provider offers a package of services, the percentage applied to broadband might be artificially inflated up to the reimbursement level of the Program.

³⁴ *Id.*

³⁵ NTCA Comments at ii; Free Press and Access Now Comments at 3 (The FCC should establish that the “standard rate” definition should encompass all of the “relevant costs, benefits, and terms” of broadband service as of Dec. 1, 2020.).

³⁶ Next Century Cities Comments at 3.

³⁷ NHMC Comments at 4 (“Surprise fees or hikes in cost at the end of the emergency period will deter many from participating in this crucial program, and thus, will temper the impact of the

bolster the credibility of the program in “low-income households who may be skeptical of enrolling in a new program....”³⁸

Finally, the Commission must establish protocols to guard against pricing schemes and marketing plans that seek to lure participants into promotional rate subscriptions that are subject to change with minimal notice and consumer understanding or change in funding sources.”³⁹

1. *Surrender of privacy rights cannot be a cost of program participation*

Every Program participant should preserve their privacy rights. Providers cannot be permitted to sell personal information obtained as a consequence of participation in the Program. Providers should also be prohibited from using such data for marketing or upselling other products.⁴⁰

Charter makes many of these same points but in reverse. That is, Charter recommends that the FCC not impose obligations on participating providers to “collect and upload more intrusive personal information about participants than is reasonable or proportionate.” Local Governments agree, especially on the issue of Social Security numbers, the collection of which has been a retarding factor in some local government efforts to provide subsidized services.⁴¹ Providers do not need to collect this personal information for the Program because other

Emergency Broadband program. This is particularly true for communities of color, who are already increasingly worried about the cost of their broadband and communications services.”).

³⁸ Next Century Cities Comments at 3.

³⁹ *Id.*; see also Free Press and Access Now Comments at 3 (Promotional rates are so prevalent for broadband services that they can “obscure” the true price of services.).

⁴⁰ Local Governments are especially worried about such privacy violations given the active role we are taking as verifiers or program sponsors. If such privacy protections cannot be guaranteed, we are worried that it might have a chilling effect on our ability to be a program verifier or sponsor.

⁴¹ Local Governments Comments at 14.

information—such as the subscriber’s address—suffices to prevent each household from receiving duplicative benefits. Providers should also be able to submit that information to the National Lifeline Accountability Database (NLAD) without being forced to collect or submit additional, sensitive information about participants.

F. Existing Programs Must Not be Interrupted and Consumers’ Right to Choose their Provider Must Not be Denied

The Act makes clear that the FCC is authorized to provide a wide latitude in making a broadband provider eligible for the Program.⁴² All Congress required was that an eligible provider be an ETC or be able to meet an Commission 4-pronged eligibility test. Local Governments agree with commenters that call on the Commission to ensure consumers participating in the Program choose which provider provides them a covered service,⁴³ and prohibit providers from automatically enrolling existing customers without their consent.”⁴⁴ Likewise, Local Governments support comments that call on the Commission to ensure the Program protects the ability of households with existing broadband service connections to change providers if in the opinion of the consumer the alternate provider offers a better

⁴² Consolidated Appropriations Act, 2021, H.R. 133, div. N, tit. IX, § 904(a)(12), (d)(2).

⁴³ Local Governments highly recommend the safeguards articulated by the Los Angeles Unified School District at 1-2 that call for:

- Prohibiting ISPs from requiring customers to sign any term agreement that would compel the customer to pay for the internet service charges in full once EBB ends;
- Prohibiting ISPs from stipulating that customers agree to receive service for a minimum period of time or else be subject to early termination charges; and
- Prohibiting ISPs from requiring that customers actively contact providers to avoid automatic continuation of services at full charge following the end of EBB.

⁴⁴ Comcast Corporation Comments at 17-18; *see also* TechFreedom Comments at 2 (“A strict (but incorrect) reading of the definitions provision of the Act, however, could lead to a situation where only existing providers would be eligible to participate, only in their previously served local areas, and then only to their current subscriber base.”)

package.⁴⁵ As TechFreedom explained, “[t]ying households to their existing carriers will not optimize the Program, and would instead stifle competition amongst providers.”⁴⁶

We reiterate the importance of including local governments, including school districts and community organizations, in the Program. The record reflects broad support for ensuring that a wide range of providers, including municipal providers, are able to easily participate in the Program. ACA notes the benefits to consumers in ensuring broad participation in the Program, by including small ISPs to bring the benefits of competition and choice to eligible households.⁴⁷ The Multicultural Media, Telecom and Internet Council (“MMTC”) and the National Urban League (“NUL”) note the same need for choice.⁴⁸ The National League of Cities notes the important role municipal broadband providers can play in the Program.⁴⁹

The record reflects numerous examples of the local sponsored programs⁵⁰ and municipal networks already in place that are critical to ensuring the Program successfully reaches as many eligible households as possible. The Los Angeles Unified School District calls on the FCC “to direct telecommunications providers to apply the EBB discounts to the charges that school

⁴⁵ TechFreedom Comments at 4.

⁴⁶ *Id.*

⁴⁷ ACA Comments at 6.

⁴⁸ Multicultural Media, Telecom and Internet Council and the National Urban League Comments at 9.

⁴⁹ National League of Cities Comments at 1.

⁵⁰ In addition to the local sponsored programs in Los Angeles, Chicago, Portland and Boston that our outlined in our comments, other examples can be seen in the City of Oakland. Comments of the City of Oakland, California at 1 (“We have raised over \$13 M from philanthropy and private donors, spending over \$3 million over the past year to provide T-Mobile internet hotspots to over 10,000 of Oakland’s school-age children. Additionally, we have spent \$8.5 million to provide 33,000 computers to children and over \$2 million to provide necessary technical support to ensure students and families have the resources needed to effectively use these devices and services.”)

districts are already paying for eligible recipients, including those for at-home wired/wireless connections and mobile hotspots.”⁵¹ The City of Longmont, Colorado outlines how it has provided municipal electric services to its residents for more than 100 years, and since 2014, has also provided a municipal broadband service of 100 MBPS asymmetrical. They request just one consideration, that the FCC not create any barriers to make municipal participation in the Program difficult.⁵² Comments show there are many small ISPs and municipal providers across the State of Washington that, if participation is ensured, will greatly expand the reach of the Program.⁵³

Numerous local government entities, as well as civic organizations, have sought means to addressing cost as a barrier to connectivity. Bulk purchasing or single payer sponsored programs are two of the more employed means to provide connection services, free or subsidized devices, and training. For example, the record describes partnerships among local government, school districts, civic organizations and broadband providers in Los Angeles,⁵⁴ Chicago,⁵⁵ Portland,⁵⁶ Boston,⁵⁷ Seattle,⁵⁸ Washington D.C.,⁵⁹ and Oakland.⁶⁰

⁵¹ Los Angeles Unified School District Reply Comments at 1.

⁵² City of Longmont, Colorado Comments at 2 (“Longmont Comments”).

⁵³ City of Seattle *et. al* Comments at 7.

⁵⁴ *See* Los Angeles, *et al.* Comments at 22.

⁵⁵ *Id.*

⁵⁶ *Id.*

⁵⁷ *Id.*

⁵⁸ City of Seattle *et. al* Comments at 4-6.

⁵⁹ The efforts of the District of Columbia to connect the unconnected are outlined in greater detail in Appendix A.

⁶⁰ City of Oakland Comments at 1-2 (“We have raised over \$13 M from philanthropy and private donors, spending over \$3 million over the past year to provide T-Mobile internet hotspots to over 10,000 of Oakland’s school-age children. Additionally, we have spent \$8.5 million to provide 33,000 computers to children and over \$2 million to provide necessary technical support to

The Program must accommodate these existing local programs so that residents can continue their existing programs if they choose to do so, and to avoid harming or potentially shutting down effective programs that predated the Program and may well be the only available option post-Program.

As the National Digital Inclusion Alliance (“NDIA”) explains:

The FCC should take all reasonable steps to encourage providers to renegotiate local, COVID-era contracts for bulk purchases of internet service for low income K-12 families, Covid impacted unemployed workers, and other households in need. Referred to as sponsored agreements or single payer agreements, these contracts involve a community anchor institution (such as a city or school district) or a community-based organization agreeing to pay directly for hundreds, if not thousands of internet service accounts for a year or more, so that low-income constituents can afford to participate in distance learning, telemedicine, etc. in the absence of Federal assistance.⁶¹

G. Program Should Guarantee Minimum Number of Months of Support

Local Governments agree with Altice that to maximize the Program’s success in connecting eligible households, the Commission should consider a minimal subsidy duration.⁶²

Broadband product offerings are typically marketed with terms that last for a minimum of a year, and this level of certainty facilitates consumer interest. While the Commission is limited in dispensing the funds appropriated by Congress, the Commission should consider a regime in which providers qualify eligible households for up to three months at a time, as an incentive for the household to participate. The Commission could operationalize this approach by accruing a cost of three months’ benefit against the total allocated funding for each eligible household enrolled. Funds from any households that cancelled service prior to three months would become available again for allocation to other households.⁶³

ensure students and families have the resources needed to effectively use these devices and services.”).

⁶¹ NDIA Comments at 7.

⁶² Altice Comments at 9.

⁶³ *Id.* at 10.

Local Governments believe that eligible parties need to know that they have access to the service for a guaranteed minimal amount of time.

III. THERE MUST BE A PLAN FOR TRANSITION WELL BEFORE FUNDING HAS EXPIRED

A. Funding Balances and Status Reports Must Be Publicly Shared

Local Governments agree with AT&T and NDIA that the Commission or USAC should publish a weekly running total of the number of subscribers enrolled in the program, as well as estimates of when the funds will be depleted.⁶⁴ Moreover, Local Governments agree with parties that the FCC should take steps to prepare consumers⁶⁵ and providers⁶⁶ alike for the day that Program funds are exhausted. We also believe that practical guidance such as that provided by MMTC and NUL should be heeded:

Commission and USAC should provide eligible providers and the general public with up-to-date information about the depletion of funding. Providers in turn should inform customers that they will be eligible to transition to an alternative, lower-priced broadband plan at the conclusion of the emergency program, making clear the price, service levels, and other terms and conditions that will apply. Providers should give notice at the time of initial enrollment and again at least 30 days before program benefits are set to expire.⁶⁷

⁶⁴ AT&T Comments at 6; NDIA Comments at 3 (“The FCC and/or USAC should provide a public online dashboard of EBB participation data, including total broadband accounts and devices subsidized by the provider, state and county; EBB funds expended, and the balance remaining.”).

⁶⁵ NCTA Comments at iii (“No low-income consumer should obtain service via the [EBBP] without a full understanding of the fact that support will be withdrawn when program funds are expended and without an awareness of the rate applicable to their service once that takes place.”).

⁶⁶ NCTA Comments at iv (“Providers will also need sufficient notice of when program funds will be expended so that they can in turn communicate effectively with subscribers regarding potential service plan and rate changes.”).

⁶⁷ MMTC *et. al* Comments at 11.

B. Obligation to Transition to New Programs.

At the conclusion of the Program, as a requirement for eligibility, a Provider should be required to work with Local Governments, to include schools and housing authorities, to provide the opportunity to find new funding models to continue to provide free or subsidized Internet service to program participants. In any case, an ISP should only be able to transition participants to other paid services offered by the ISP with participants' affirmative consent (rather than opt-out).

IV. PROGRAM SUCCESS IS CONTINGENT UPON ELIGIBLE PARTIES BEING AWARE OF ITS EXISTENCE

"Sufficient consumer awareness ... [to] include multiple notifications and channels to let new customers and current internet subscribers understand the program, how long the benefit lasts, when they are risking additional charges (e.g. data caps), and what their options are when the benefit is going to expire."⁶⁸ Local Governments also called on the FCC to make a strong commitment to promote of the Program.⁶⁹ We were not alone.⁷⁰ And we applaud the Commission's efforts to date, including a daylong seminar⁷¹ to take testimony and the creation of a webpage to capture volunteers.⁷²

⁶⁸ City of Seattle *et. al* Comments at 13.

⁶⁹ Local Government Comments at 23-24.

⁷⁰ Next Century Cities Comments at 3 (FCC should also create public service announcements that run on television, radio, and the Internet to promote the program.); New America's Open Technology Institute Comments at 8 (Commission should "aggressively publicize" the program and require participating providers to do the same.).

⁷¹ *Wireline Competition Bureau Provides Details About Emergency Broadband Benefit Program Roundtable*, Public Notice (rel. Feb. 5, 2021) available at <https://www.fcc.gov/document/fcc-provides-details-about-emergency-broadband-benefit-program-event>.

⁷² FCC Seeks Outreach Partners For Emergency Broadband Benefit, News Release (rel. Feb. 11, 2021) available at <https://www.fcc.gov/document/fcc-seeks-outreach-partners-emergency-broadband-benefit>.

A. Providers Should Bear Promotional Obligations

The MMTC and the NUL called on the Commission to require participating providers to advertise the existence of the Program to EBBP eligible households and otherwise promote awareness of the EBBP.⁷³ The City of Madison, Wisconsin echoed this message: “We urge the Commission to require participating providers to publicize the availability of their low-cost programs in their service areas since there is a definite lack of knowledge about program availability in Madison.”⁷⁴ The City of Austin, Texas suggests “Providers should allocate a portion of marketing and promotional materials funds to anchor institutions, non-profits, local government and other entities providing direct and indirect needs assistance to low-income [households].”⁷⁵

Local Governments support the ideas of MMTC, NUL, and the Cities of Madison and Austin. We are very pleased that they are not the only parties that recognize and call on the continued partnership of providers and local governments to promote the availability of the Program.⁷⁶

B. Local Governments Can Be Key in Promoting Awareness of the Program

The record recognizes the significant role local governments can and wish to play in promoting the Program. Commenters from a wide range of stakeholders call on the Commission

⁷³ MMTC *et. al* Comments at 9.

⁷⁴ City of Madison, Wisconsin Comments at 2.

⁷⁵ City of Austin, Texas Comments at 3.

⁷⁶ See e.g. Next Century Cities Comments at 3; New America’s Open Technology Institute Comments at 8; City of Seattle *et. al* Comments at 14 (FCC should ensure providers are funding outreach and sign-up assistance partnerships via local and state government, tribes, ethnic media, anchor institutions and the trusted culturally competent community-based organizations that are often residents’ primary contact in learning about and signing up for essential services.); Microsoft Corporation Comments at 7.

to create a an information kit to promote the program and to support, or even engage local governments to assist in the distribution of that information.⁷⁷ Local governments can bring multiple tools to the promotional effort. These include: PEG channels, school district communications and other civic organizations that can be distribute in their respective communities. A collection of state educators in their comments call on the FCC to facilitate the efforts of states and school districts to notify eligible families about the program.⁷⁸ NCTA notes the importance of state and local government outreach.⁷⁹ The National Affordable Housing Management Association also recognizes the need to partner with local governments and affordable housing providers to promote the Program.⁸⁰ The National Digital Inclusion Alliance’s highlights the need for the Commission to provide “digital and print materials, coordination with media and support for outreach efforts by non-provider intermediaries such as trusted community organizations, local anchor institutions and public bodies.”⁸¹

V. CONCLUSION

Local Governments stand ready to assist the Commission achieve the vision outlined by Congress for the Program: eligible parties having access to robust upload and download

⁷⁷ NDIA Comments at 5 (“A reasonable portion of the two percent (\$64 million) allowed by the Consolidated Appropriations Act for EBB management expenses should be dedicated to strategic investment in community-based capacity for program recruitment and consumer support in communities with the greatest need.”).

⁷⁸ The State Educational Technology Directors Association, the Consortium for School Networking, and the Alliance for Excellent Education Comments at 2-3 (“This practical step could include equipping state education agencies and school districts with consumer-friendly information about the [program], including where and how to enroll in the program.”).

⁷⁹ NCTA *Ex Parte* letter at 4.

⁸⁰ National Affordable Housing Management Association Comments at 3.

⁸¹ NDIA Comments at 4.

broadband services that can support not only online learning, but work from home, telehealth and telemedicine applications – potentially all at the same time.

Respectfully submitted,

/s/ Gerard Lavery Lederer

Gerard Lavery Lederer

BEST & KRIEGER LLP

(202) 370-5304; Cell: (202) 664-4621

1800 K Street N.W., Suite 725

Washington, DC 20006

Counsel for the Local Governments

February 16, 2021

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CHIEF TECHNOLOGY OFFICER

February 16, 2021

The Honorable Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
45 L Street, NE
Washington, DC 20554

RE: WC Docket No. 20-445, In the Matter of Establishing Procedures for the Emergency Broadband Connectivity Fund Assistance

Dear Secretary Dortch:

At the request of Washington, DC Mayor Muriel Bowser, the undersigned Chief Technology Officer on behalf of the DC Government respectfully submits these comments in response to the Federal Communications Commission's (FCC) Public Notice in the above-referenced proceeding.

The COVID-19 pandemic amplified the need to address equitable and ubiquitous access to internet in Washington, DC. The DC Government applauds the Emergency Broadband Benefit Program (EBBP) and believes it will directly benefit and help mitigate the financial burdens of more than 50,000 eligible households in DC.

However, the DC Government wishes the FCC to also consider a phased approach to achieve progress through these immediate solutions (EBBP) while also investing in innovations that will achieve broader impact and value in the longer term.

I. Today: Emergency response to increased need

As schools shifted classes online, students without regular access to the internet are at a severe disadvantage. To immediately address this need, Mayor Bowser launched the \$3.3 million **Internet for All** initiative in September of 2020 to provide free internet access for up to 25,000 SNAP and TANF eligible families in our traditional and charter public schools. The funding was made available by the 2020 Coronavirus Aid, Relief, and Economic Security (CARES) Act Governor's Emergency Education Relief (GEER) Fund.

We have joined a coalition of cities, including Los Angeles, Chicago, Portland, Boston, and others, in submitting a joint response, which expands in detail our comments and recommendations based on our experience with Internet for All. The priority areas we provided comment on and ask the FCC to consider include:



GOVERNMENT OF THE DISTRICT OF COLUMBIA

OFFICE OF THE CHIEF TECHNOLOGY OFFICER

Small Business Participating Providers: DC Government encourages the FCC to work with local jurisdictions to identify and expand on “all eligible providers” in order to maximize the reach and equity in service. There should be no barriers for non-ETC providers and partnership groups to qualify.

Program Benefits: DC Government strongly recommends that providers include monthly rental costs for modems and Wi-Fi routers, which are part and parcel of an Internet service offering.

Customer Eligibility: DC Government recommends that providers not be allowed to condition participation on the absence of past debts nor attempt debt collection during participation in the program.

Protecting the Customer: Every customer should be treated fairly by disallowing ISPs from selling personal information they obtain or using data for marketing or upselling other products.

Partner locally: The FCC should give trusted community leaders and organizations tools to support outreach to residents and to give participants technical assistance and training to ensure wide adoption.

End of life: Finally, and most important, at the conclusion of EBBP, ISPs should be required to work with local jurisdictions to provide the opportunity to find new funding models to continue to provide free internet service to program participants. In any case, ISPs should only be able to transition participants to other services offered by the ISP with participants’ affirmative consent (rather than opt-out).

II. Tomorrow: Leverage Municipal Telecommunications Networks

Beyond EBBP, the DC Government asks that the FCC flexibly support broadband services provided through creative and non-traditional use of government networks and partnerships that bring broadband service to residents – especially to residents who are the most challenged in obtaining service otherwise.

The DC Government owns and operates an extensive jurisdiction-wide 800+ mile fiber optic network that provides telecommunications services to the DC Government, federal government, DC schools, libraries, community centers, senior centers, fire and police stations, universities and colleges, hospitals, and health and social services clinics.

The existing DC network is a key tool in the DC Government’s effort to address the digital divide by:

Partnering with community anchor institutions and DC Government agencies seeking to provide internet to **residents living in temporary, transitional, and publicly subsidized housing.**

Exploring ways to be a **middle mile provider**, by partnering with local and small-scale wireless ISPs to use our existing network to bring high-value wireless broadband service to residents most in need, while reducing the overall cost to deliver service for those small ISPs.

The DC Government recommends the FCC recognize and support the interconnected roles that government networks, community anchor institutions, and ISPs play and form in partnerships to deliver broadband service, support resident use and training, and sustain network services. These

GOVERNMENT OF THE DISTRICT OF COLUMBIA

OFFICE OF THE CHIEF TECHNOLOGY OFFICER

service-based partnerships are creative responses to specific local challenges and will result in non-traditional, cost-effective solutions. For example, these services may include a low per-user cost, building-based fee model for homeless, transitional, and public housing sites where government, community anchors, and ISPs share roles in optimizing service value.

III. Future: Transform connectivity through new technologies

To achieve a truly connected community, the FCC should extend funding to innovations in municipal communication networks that can expand to serve the growing and changing needs of dense metropolitan areas. Like other major metropolitan areas, Washington, DC faces challenges of inequity and digital divide, but in addition to this, as home of the federal government, frequently hosts National Special Security Events and large-scale First Amendment activities. To meet these unique challenges, DC has a highly resilient government-managed network infrastructure that not only supports public safety and the secure delivery of city services, but also enables communications for residents and visitors alike via public wi-fi.

As owner and operator of critical telecommunications infrastructure, DC is also uniquely positioned to promote opportunities for all residents to equitably connect to digital services. Extending this infrastructure to incorporate broadband wireless technologies such as **Citizens Broadband Radio Service (CBRS)**, gigabit Wi-Fi, and other solutions will enable the city to establish long-term, sustainable, and cost-effective solutions to address specific needs for connectivity within our diverse neighborhood communities.

A sample of potential use cases for this publicly managed wireless broadband network in DC includes:

- CBRS-enabled devices with **mobile hotspot connectivity** that will strengthen our ability to communicate with residents and visitors during emergency situations;

- Partnerships with public schools and public charter schools to support free **in-home connections for students**;

- Targeted CBRS-enabled broadband access for **families and seniors in public housing**; and

- Collaboration with university-led wireless networks enabling **roaming connectivity for public school students and adult learners** throughout Washington, DC.

Like other cities, we do not accomplish service delivery goals in a vacuum. As demonstrated most recently through our Tech Together DC initiative (techtogether.dc.gov), we collaborate closely with community-based organizations, academia, and technology partners. Broadband services delivered through these public partnerships will match strictly commercial offerings – but more importantly, we will address our communities’ needs.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE CHIEF TECHNOLOGY OFFICER

IV. Conclusion

The Emergency Broadband Benefit Program is focused on enabling those most in need to quickly access Internet service through the pandemic. We support this wholeheartedly. At the same time, we urge the FCC to consider the critical role that municipal and government infrastructure networks play in the delivery of broadband to communities most in need.

The DC Government looks forward to being a partner with other jurisdictions and the FCC to expand broadband access to allow all residents to have equal opportunities to thrive.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Parker', with a stylized flourish at the end.

Lindsey V. Parker
Chief Technology Officer
DC Government



INTERNET ACCESS FOR DC STUDENTS

EXHIBIT B

GUIDE FOR SCHOOLS - 2021

ABOUT THE PROGRAM

Who is eligible?

DC will pay for at home internet for approximately 25,000 households with school aged children enrolled at DC traditional and charter public schools that receive SNAP or TANF benefits.

Comcast and RCN both recognize SNAP and TANF as eligibility requirements for their low-cost internet programs. DC Government will not disclose household SNAP or TANF participation.

****At this time we are focusing on this eligible cohort, as we continue our outreach, learn who does and does not want to participate, we will revisit opening the program to Adult Learners and other eligibilities. ****

How are we determining the address that will receive at home internet?

OCTO will be using the **student address** identified in the Student Information System as the household address for each student.

Students who are virtually learning from locations other than their primary address will need to be flagged by LEAs in a separate form.

What do families need to do?

The **primary guardian** will receive a call, text message, or email from DC Government asking if they'd like to join the program and for consent to share their name, address, phone number, and email with the internet provider that will be providing their service, either Comcast or RCN. Comcast or RCN will then contact the household to initiate the internet installation process.

From the point of contact with Comcast or RCN the household should receive their install kit or appt within 5-7 days. **Please make sure contacts are checking their voicemail and emails in case they miss the call from Comcast or RCN.**

A family says they missed the call, deleted the text or never got an email, how do I help?

Communications will go out weekly until we receive a "No" or opt-out response. If they missed or have not seen a new request, please check that their contact information is up-to-date. (review the communications schedule on page 3)

A family opted out but changed their mind

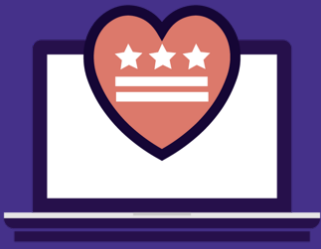
If they responded "No" or opted out but have changed their mind, please fill out the studentinternet.octo.dc.gov form.

A family said they have not heard from Comcast or RCN.

Check their status in the GEER app to determine which ISP they should be expecting a call from. See pages 5 and 6 for instructions as well as contact info for Comcast and RCN. The coverage process takes about 2 weeks to determine the best internet provider for each household, depending on volume this could be longer.

Do they need a code to sign up for the program?

No, in order to remove this barrier of distributing codes, households need to simply respond to our communication and Comcast or RCN to complete internet installation.



INTERNET ACCESS FOR DC STUDENTS

GUIDE FOR SCHOOLS - 2021

ABOUT FREE HOME INTERNET

What is the internet service the household will receive?

Depending on the household area internet coverage the two programs available are Comcast Internet Essentials or RCN Internet First. Both services provide up to 25/3 Mbps access speeds for approximately \$10/month.

Will 25/3 Mbps be enough to connect more than one device?

At 25/3 Mbps, you can connect between 1-2 devices at the same time. You can access the web and your email, use social networks, and watch videos.

How long will each account be covered by DC Government?

Under this offer each household will receive 12 months free Internet service from the time they enroll.

Will families receive a monthly bill from Comcast or RCN?

The account holder will receive a \$0 monthly statement with no payments due for 12 months.

The household has debt with Comcast and/or RCN, can they still enter the program? Will they have to pay their debt?

If they have past or present debt with Comcast or RCN and enroll in this program, Comcast and RCN will not attempt to collect customer debt.

Are they required to remain enrolled for the full 12 months or after the 12 months of covered service ends?

They are not required to keep the service for the full 12 months or beyond 12 months of the internet service offer. They can opt out at any time, without penalty with the carrier. They will be required to return any equipment provided by Comcast or RCN.

What happens if a family moves during the school year?

If a family moves and stays in DC, they must contact the ISP to move their account to the new address. If they move to another location in the District where their current ISP doesn't provide service, they will need to re-enroll in the program, schools should update in their SIS.

What happens if a family already has Internet Essentials or Internet First


A household currently enrolled in Internet Essentials or Internet First that needs assistance can have their account migrated to be paid for by DC Government. They must still follow the consent process via text, call or email. Comcast or RCN will then contact the household to initiate the migration process.

Can we get mifis through this program?


Currently, our focus for the GEER funding is to provide free residential internet access where students will be virtually learning this term. We believe that in doing so, we might spend down our entire grant.

Internet for All Communications

DC Government reaches out directly by text, phone call and email to SNAP and TANF eligible households with PK3-12th grade students enrolled at DC traditional and charter public schools. Every communications cycle was translated into six languages (Spanish, Korean, Vietnamese, French, Chinese, Amharic)



DO YOU NEED FREE INTERNET AT HOME FOR YOUR DC STUDENT?



Mayor Muriel Bowser wants to make sure your student has internet at home during this virtual school term.

DC Government will be paying for residential internet service for eligible households provided by Comcast and RCN.

Beginning Tuesday, September 7, DC Government will begin reaching out to SNAP and TANF eligible households with PK3-12th grade students enrolled at DC traditional and charter public schools, according to the following schedule:

Tuesday, September 8 - Text Message at 11 am

Wednesday, September 9 - Phone call at 11 am

Thursday, September 10 - Email at 11 am


Tuesday, September 15 - Text Message at 3 pm

Wednesday, September 16 - Phone call at 3 pm


Thursday, September 17 - Email at 3 pm

Please contact your student's school for additional information.

DC GOVERNMENT OF THE DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR



¿Necesita internet gratis en casa para su estudiante?



La Alcaldesa Muriel Bowser quiere asegurarse de que su estudiante tenga Internet en casa durante este período escolar virtual.

El gobierno del Distrito pagará el servicio de internet residencial para hogares elegibles proporcionado por Comcast y RCN.

A partir del martes 8 de septiembre, el gobierno de DC comenzará a contactar a los hogares elegibles para el Programa de asistencia nutricional suplementaria (SNAP) y el programa de Asistencia Temporal para Familias con Necesidades (TANF) con estudiantes de Pre Kinder (PK3) hasta 12vo grado matriculados en escuelas públicas tradicionales y autónomas de DC, de acuerdo con el siguiente cronograma:

Martes 8 de septiembre - mensaje de texto a las 3 pm

Miércoles 9 de septiembre - Llamada telefónica a las 3 pm

Jueves, 10 de septiembre - Correo electrónico a las 3 pm

Martes, 15 de septiembre - Mensaje de texto a las 11 am

Miércoles 16 de septiembre - Llamada telefónica a las 11 am

Jueves, 17 de septiembre - Correo electrónico a las 11 am

Comuníquese con la escuela de su hijo o hija para obtener información adicional.

DC GOVERNMENT OF THE DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR



DC 학생 무료 자택용 인터넷 프로그램



유리얼 배우서 시장은 원격학습 기간동안 당신의 자녀가 집에서 인터넷을 사용할 수 있도록 돕고자 합니다.

DC정부는 적격 가구를 대상으로 주거용 Comcast 혹은 RCN 인터넷 비용을 대신 지불할 것입니다.

DC 정부는 9월 8일 화요일부터 DC 내 일반 혹은 차터(charter) 공립학교 등록 학생(어린이집부터 12학년까지) 자녀를 가진 SNAP 및 TANF 적격 가구를 대상으로 다음 스케줄에 따라 연락할 것입니다:

9월 8일 (화): 오후 3시에 문자

9월 9일 (수): 오후 3시에 전화

9월 10일 (목): 오후 3시에 이메일

9월 15일 (화): 오전 11시에 문자

9월 16일 (수): 오전 11시에 전화

9월 17일 (목): 오전 11시에 이메일

추가 정보는 자녀 학교로 연락하여 확인하세요.

DC GOVERNMENT OF THE DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR



ዲ.ሲ. ለምሳር ልጅዎ በቤትዎ ነፃ የኢንተርኔት አገልግሎት ይፈልጋሉ?



ከንጉሰ ሙሉል ትምህርት በርቀት በሚሰጥበት ወቅት ተማሪ ልጅዎ በቤት ውስጥ የኢንተርኔት አገልግሎት መጥረግ ለርገጠኛ አገላግሎት ይፈልጋሉ።

ዲ.ሲ. መንግስት በኮምፒውተር እና በ RCN ለሚሰጡት ብቁ ለሆኑ ቤተሰቦች የመጥሪያ ቤት የኢንተርኔት አገልግሎት ከፍተኛ ይደርሳል።

ከመጨረሻ ማስታወሻ ሲገኝም ሲገኝም ዲ.ሲ. መንግስት በሚሰጠው የፕቢ ስለጥ መሠረት በዲ.ሲ. በተለያዩ ዓመት ቻርተር የመንግስት ትምህርት ቤቶች በተመዘገቡ ከ PK3-12 ኛ ከፍተኛ ተማሪዎች ህገ ስልጣን እና ለ TANF ብቁ ለሆኑ ቤተሰቦች መገኘት ይጀምራል።

ማስታወሻ ፡ ለፕሮጀክት 8 - 3 ሰዓት የልዩነት አገልግሎት

ረቡዕ ፡ ለፕሮጀክት 9 - በ 3 ሰዓት በልዩነት

ሐሙስ ፡ ለፕሮጀክት 10 - በ 3 ሰዓት ላይ በሲሜል


ማስታወሻ ፡ ለፕሮጀክት 15 - በ 11 ሰዓት የጽሑፍ መልስ

ረቡዕ ፡ ለፕሮጀክት 16 - በ 11 ሰዓት ላይ በሲሜል


ሐሙስ ፡ ለፕሮጀክት 17 - በ 11 ሰዓት ላይ በሲሜል

ለተጨማሪ መረጃ እንዲገኝ የተማሪ ልጅዎን ትምህርት ቤት ያነጋግሩ።

DC GOVERNMENT OF THE DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR



DO YOU NEED FREE INTERNET AT HOME FOR YOUR DC STUDENT?



Internet for All

Mayor Muriel Bowser wants to make sure your student has internet at home for virtual learning. Through a new program called Internet for All, DC Government will be paying for a year of residential internet service for eligible households provided by Comcast and RCN.

How it Works:

DC Government will reach out directly by text, phone call and email to SNAP and TANF eligible households with PK3-12th grade students enrolled at DC traditional and charter public schools, according to the following schedule in January and February of 2021.

Tuesday, January 26 - Text Message at 6pm

Wednesday, January 27 - Phone call at 6pm

Thursday, January 28 - Email at 6pm

Tuesday, February 9 - Text Message at 6pm

Wednesday, February 10 - Phone call at 6pm

Thursday, February 11 - Email at 6pm


Tuesday, February 23 - Text Message at 6pm

Wednesday, February 24 - Phone call at 6pm


Thursday, February 25 - Email at 6pm

Once you agree to participate in the program and allow Comcast or RCN to contact you, they will reach out to initiate the internet installation process. Please be sure to answer their call! **Please contact your student's school to check your eligibility and program status.** Internet for All is part of the Tech Together DC Partnership. Find more information online at techtogether.dc.gov.

DC GOVERNMENT OF THE DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR



¿Necesita Internet gratis en casa para su hijo que estudia en la escuela en DC?



Internet para todos

La Alcaldesa Muriel Bowser quiere asegurarse de que los estudiantes tengan Internet en casa para el aprendizaje de forma virtual. A través de un nuevo programa llamado Internet para todos, El gobierno de DC pagará un año de servicio de Internet residencial proporcionado por Comcast y RCN para hogares elegibles.

Cómo funciona:

El gobierno de DC se comunicará directamente por mensaje de texto, llamada telefónica y correo electrónico con los hogares elegibles para el Programa de Asistencia Nutricional Suplementaria (SNAP) y el Programa de Asistencia Temporal para Familias con Necesidades (TANF) con estudiantes de Pre Kinder 3 a 12 º grado inscritos en escuelas públicas tradicionales y autónomas de DC, de acuerdo con el siguiente cronograma en enero y febrero de 2021:

Martes, 26 de enero - Mensaje de texto a las 6pm

Miércoles 27 de enero - Llamada telefónica a las 6pm

Jueves 28 de enero - Correo electrónico a las 6pm

Martes 9 de febrero - mensaje de texto a las 6pm

Miércoles 10 de febrero - llamada telefónica a las 6pm

Jueves, 11 de febrero - Correo electrónico a las 6 pm

Martes 23 de febrero - mensaje de texto a las 6pm

Miércoles 24 de febrero - llamada telefónica a las 6pm

Jueves, 25 de febrero - Correo electrónico a las 6pm

Una vez que acepte participar en el programa y permita que Comcast o RCN se comuniquen con usted, ellos se comunicarán con usted para iniciar el proceso de instalación de Internet. ¡Asegúrese de responder la llamada! **Comuníquese con la escuela de su hijo para verificar su elegibilidad y el estado del programa.** Internet para todos es parte de la asociación Tech Together DC. Encuentre más información en línea en techtogether.dc.gov.

DC GOVERNMENT OF THE DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR



ዲ.ሲ. ለምሳር/ለሚማር ልጅዎ በቤትዎ ነፃ የኢንተርኔት አገልግሎት ይፈልጋሉ?



ኢንተርኔት ለሁሉም

ከንጉሰ ሙሉል ትምህርት በርቀት በሚሰጥበት ወቅት ተማሪ ልጅዎ በቤት ውስጥ የኢንተርኔት አገልግሎት መጥረግ ለርገጠኛ አገላግሎት ይፈልጋሉ።

ዲ.ሲ. መንግስት በኮምፒውተር እና በ RCN ለሚሰጡት ብቁ ለሆኑ ቤተሰቦች የመጥሪያ ቤት የኢንተርኔት አገልግሎት ከፍተኛ ይደርሳል።

ከመጨረሻ ማስታወሻ ሲገኝም ሲገኝም ዲ.ሲ. መንግስት በሚሰጠው የፕቢ ስለጥ መሠረት በዲ.ሲ. በተለያዩ ዓመት ቻርተር የመንግስት ትምህርት ቤቶች በተመዘገቡ ከ PK3-12 ኛ ከፍተኛ ተማሪዎች ህገ ስልጣን እና ለ TANF ብቁ ለሆኑ ቤተሰቦች መገኘት ይጀምራል።

ማስታወሻ ፡ ለፕሮጀክት 8 - 3 ሰዓት የልዩነት አገልግሎት

ረቡዕ ፡ ለፕሮጀክት 9 - በ 3 ሰዓት በልዩነት

ሐሙስ ፡ ለፕሮጀክት 10 - በ 3 ሰዓት ላይ በሲሜል

ማስታወሻ ፡ ለፕሮጀክት 15 - በ 11 ሰዓት የጽሑፍ መልስ

ረቡዕ ፡ ለፕሮጀክት 16 - በ 11 ሰዓት ላይ በሲሜል

ሐሙስ ፡ ለፕሮጀክት 17 - በ 11 ሰዓት ላይ በሲሜል

ለተጨማሪ መረጃ እንዲገኝ የተማሪ ልጅዎን ትምህርት ቤት ያነጋግሩ።

DC GOVERNMENT OF THE DISTRICT OF COLUMBIA
MURIEL BOWSER, MAYOR