

**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:



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**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

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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 ([techttogether.dc.gov](http://techttogether.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.

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**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,



Lindsey V. Parker  
Chief Technology Officer  
DC Government