

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	

COMMENTS OF THE CITY OF NEW YORK

The City of New York (“City”) hereby submits the following comments in response to the Notice of Proposed Rulemaking released by the Federal Communications Commission (“Commission”) regarding reform and modernization of the Lifeline and Link Up programs.¹ The City supports the Commission’s efforts to modernize the Universal Service, Lifeline, and Link Up programs, particularly its proposals to make broadband an integral part of these programs going forward. As described in previous filings, it is the City’s view that any broadband policy seeking to significantly enhance broadband use must place significant, if not primary, emphasis on the adoption of broadband services²

¹ *In the Matter of Lifeline and Link Up Reform and Modernization, Federal-State Joint Board on Universal Service, and Lifeline and Link Up*, WC Docket No. 11-42, CC Docket No. 96-45, and WC Docket No. 03-109, Notice of Proposed Rulemaking, FCC 11-32 (rel. March 4, 2011) (“Notice”).

² See Comments of The City Of New York, *American Recovery and Reinvestment Act of 2009 Broadband Initiatives*, NTIA Docket No. 090309298-9299-01, at 4-10 (filed on April 13, 2009); and Comments of The City Of New York, GN Docket No. 09-40 (filed on April 13, 2009).

In this regard, the City supports revising the definition of “Lifeline” to explicitly allow support for broadband.³ But merely offering discounts of the type and scope that have to date been associated with Lifeline and Link Up will only begin to address one aspect of the broadband adoption problem. Providing discounts alone, and discounts at current funding levels, were sufficient to address most of the demand side issues associated with the adoption of basic landline telephone service – a 135-year-old technology highly familiar and accessible to almost every potential user. By contrast, the problem of broadband adoption is multifaceted, and holistic policies that seek to address simultaneously the varied aspects of this problem are the most likely to succeed in expanding adoption.

To this end, the City is particularly enthusiastic about the Commission’s proposals to set aside funds for pilot programs to test different approaches towards providing support for broadband to low-income consumers across different geographic areas.⁴ The City supports the Commission’s proposals to implement programs that experiment with combining “discounts on service and/or hardware with efforts to address other barriers to broadband adoption such as digital literacy.”⁵

³ *Notice* at ¶ 275.

⁴ *Id.* at ¶ 280.

⁵ *Id.* at ¶ 281.

⁷ Through two grant awards received from the NTIA’s Sustainable Broadband Adoption Program, the City is implementing a broadband adoption program that targets low-income public school students and their families and offers them computer training, equipment and subsidized or free broadband access. *See* New York City Department of Information Technology and Telecommunications, NYC Connected Learning available at <http://www2.ntia.doc.gov/grantees/NYCDeptITT>; and City of New York SBA, Connected Foundations available at <http://www2.ntia.doc.gov/grantee/city-of-new-york-sba>. Through one grant received from the NTIA’s Public Computer Center Program, the City is upgrading and expanding public computer centers in high poverty areas in conjunction with the establishment of programs for digital literacy and multimedia training, the creation of after school programs, the provision of test preparation and

Indeed, using federal funds from the National Telecommunications and Information Administration's ("NTIA") Broadband Technology Opportunities Program, the City has implemented several broadband adoption programs that seek to address the adoption problem in a multi-pronged manner.⁷ Going forward, the City can certainly make data available from its own programs as a guide to policymakers in designing, developing, and expanding broadband adoption support programs.

Among the key challenges in assuring effective broadband adoption programs that truly "move the dial" significantly to increase broadband adoption will be arranging for sufficient financing for such programs. Policy makers will need to carefully review funding priorities and approaches to broadband pricing to assure adequate support for expanding broadband adoption. A recent survey released by the NTIA indicated that 26% of the responding households that lacked a home broadband connection said that the reason for their non-adoption was that the service was too expensive (compared, for example, to 4% who said the reason was that service was unavailable in their area).⁸ That 26% number suggests that there are some 11 million U.S. households that lack broadband service because it is too expensive. If the goal is to move toward universal adoption of broadband in the home in a manner comparable to what has been achieved with respect to

workforce education. See City of New York, NYC Connected Communities available at <http://www2.ntia.doc.gov/grantee/city-of-new-york>.

⁸ *Exploring the Digital Nation: Home Broadband Internet Adoption in the United States*, U.S. Department of Commerce, p.17, Fig. 6 (rel. Nov. 2010).

home voice telephone service, creative approaches will need to be taken to achieve a broadband version of true “Lifeline” service.

In summary, the City recognizes that implementing federally-sponsored holistic broadband adoption policies may raise a host of issues that the Commission has not previously had to address for programs that sought to enhance access to, and adoption of, basic voice service. The City views widespread broadband use as a key economic driver for the future and a powerful tool for enhancing the overall quality of life for all Americans. Consequently, the City stands ready to assist the Commission in any way possible in its endeavors to establish comprehensive broadband adoption policies.

Respectfully submitted,

/s/

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