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

In the Matter of

Emergency Broadband Benefit Program
WC Docket No. 20-445

Reply Comments from the American Library Association

The American Library Association (ALA) is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. For more than 140 years, ALA has been the trusted voice for academic, public, school, government and special libraries, advocating for the profession and the library's role in enhancing learning and ensuring access to information for all. ALA represents the nation’s 117,000 libraries, which includes 16,557 public library locations in communities of all sizes. We appreciate the opportunity to submit reply comments on the Emergency Broadband Benefit (EBB) program.

While we made progress over time, the digital divide has stubbornly persisted for millions of Americans. Now, with the country plagued by the COVID-19 pandemic this past year, the need for all households to have affordable, robust internet connectivity to fully access educational, economic and civic opportunity has become even more explicitly clear. Every day library staff witness the repercussions of the divide as so many lacking internet access and digital skills depend on the library for both. Recognizing the pandemic as a call to action, the ALA’s governing body recognized broadband as a human right in January 2021. The resolution affirms universal access to affordable high-capacity broadband is as essential as electricity and a basic right for all; and calls for consistent advocacy for policies through which libraries can affect...
positive change toward such universal access.¹ As such, we welcome the Emergency Broadband Benefit program as one several critical federal programs to immediately improve broadband access.²

While libraries do not have a direct role in applying for or distributing the benefits offered by the EBB program, the ALA believes libraries can have a vital role in providing accurate and relevant information to empower patrons to understand the program and participate as appropriate. The Commission acknowledges the importance of such a role when the Notice states: “[We] seek comment on using other civic entities to publicize the availability of these funds. Are there measures schools, libraries and other local institutions can take to encourage participation in this program?”³

For those who lack home broadband—disproportionately low-income, Black, Latinx, and Indigenous people—libraries provide critical access to computers and a high-speed broadband connection. In 2018, public library patrons logged more than 240 million computer sessions nationwide, conducting job searches, accessing e-government services, engaging in distance learning, and participating in telehealth services using public library computers. Residents regularly turn to their public library for help navigating the Internet and support in building digital literacy skills. As the nation implements the COVID-19 vaccine roll-out, libraries once again are stepping up to help residents find and register for online vaccination appointments. Libraries are particularly well positioned to serve as an information resource for the EBB program given their history as a trusted hub for online information and resources.

In fact, multiple commenters in this proceeding have referenced libraries in this role of promoting public awareness of the EBB program, including:

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² We think the EBB program can augment the other programs the Commission has to help close the internet connectivity gap, including Lifeline, E-rate and the High Cost programs.

• The Commission should “Ensure that periodically updated information in paper form is posted at local government facilities, physicians’ offices, schools and **libraries**, and other anchor institutions that provide detailed explanations of how to obtain the benefit or who to contact to do so.”\(^4\) Microsoft comments. (Emphasis added.)

• “Participating providers should be encouraged to pursue outreach campaigns with **libraries**, food banks, local news, grocery stores, and other community anchor institutions.”\(^5\) New America comments. (Emphasis added.)

• “Building general awareness of the Program will also require active engagement by other stakeholders and civil society groups that work with financially disadvantaged consumers.” NCTA comments.”\(^6\)

The Benton Institute highlighted the current difficulties of getting information to consumers “with many libraries and community computing centers closed.”\(^7\) While libraries have followed health and safety guidelines limiting large gathering, most libraries continue to meet community needs through virtual programs; phone access to library staff; curbside pickup, home delivery and off-site lockers and library kiosks; and limited in-person public access to library technology and collections. Libraries also partner with key stakeholder institutions and can act as distribution points for customers served at outreach locations. Librarians are experts on the communities they serve and can work to get information to those who would benefit from the program.

To enable libraries and other trusted community intermediaries to do the essential work of informing and engaging eligible residents, the Commission must consider the outreach and promotion for the EBB program as seriously as it does the responsibility to develop the rules for establishing and overseeing it. Otherwise, the program will fail its purpose of addressing the immediate needs of millions of Americans to access online learning, vaccine registration portals, online tax forms, job applications, homework help and more. The ALA recommends the Commission quickly take the following steps:

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\(^7\) Benton Institute comments, page 14-15. January 25, 2021
• As multiple commenters note, the FCC should require providers to promote awareness of the EBB Program, as well as undertake its own promotional campaign. The program rollout should include:
  
  o FCC orientation and training for library staff and other trusted intermediaries, as well as a commitment to ongoing program improvements in response to feedback from these intermediaries and the people they serve;
  
  o Online clearinghouse of provider and eligibility information in simple language;
  
  o Brief print materials (preferably in multiple languages and with inclusive images) from the FCC on the EBB program⁸ that also are available as digital downloads and that provide a telephone help line in addition to any web links;
  
  o Social media messaging for easy sharing; and
  
  o Public service announcements for traditional media.

• Furthermore, the FCC should allocate funding for community-based outreach through libraries and other trusted public and community-based institutions, as several commenters correctly state that “partnering is the only way to succeed.”⁹ Libraries and other community institutions may:
  
  o Serve as turnkey points of service for EBB program registration and distribution of technology;
  
  o Provide digital literacy training to increase awareness and successful use of online educational and employment tools and resources; and
  
  o Partner with and make referrals as needed to other community agencies to expand outreach to food pantries, senior centers, mass transit providers, and social service organizations to address transportation and other barriers to access.

In conclusion, the ALA is a strong supporter of the Emergency Broadband Benefit program, and we ask the Commission to develop the regulations and other processes needed to implement this program as soon as possible. In relation to promotional materials, we encourage the Commission

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⁸ See comments from Public Knowledge. “As a part of this effort, the FCC should create materials clearly describing the program and how to enroll...”, page 7, January 25, 2021.

⁹ See comments from City of Los Angeles CA, City of Chicago IL, City of Portland OR, City of Boston MA, Texas Coalition of Cities for Utility Issues, page 22, Microsoft Word - 33635543_3 (fcc.gov)
to develop such materials and to contact the association\textsuperscript{10} to discuss ways in which our libraries can distribute these materials to the residents they serve.

Respectfully submitted,

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\textsuperscript{10} In 2008-09 ALA worked directly with the FCC’s Office of Consumer and Governmental Affairs Bureau to coordinate getting information to libraries for them to distribute on the conversion to digital Television.