



February 21, 2017

Office of Chairman Pai
Federal Communications Commission
445 12th St. SW.
Washington, D.C. 20554

Dear Chairman Pai,

The National Housing Conference (NHC) congratulates you on your new role at the Federal Communications Commission. NHC has been pleased to work with you and your staff on closing the digital divide, and we look forward to continuing work with you to ensure housing plays a role in that effort. We also wish to share our perspective in response to the Feb. 3 LBP Reconsideration Order that affected nine broadband providers. NHC supports the expansion of the Lifeline program to broadband. The FCC should conduct appropriate review of all providers, and we are confident that housing providers and other ISPs can effectively and efficiently supply broadband to low-income consumers. We respectfully request a meeting with you or your staff to better understand how you plan to approach the Lifeline program and the role of housing providers with it.

I. About the National Housing Conference

The National Housing Conference educates decision makers and the public about housing policies and practices to move housing forward together. NHC convenes and collaborates with our diverse membership and the broader housing and community development sectors to advance our policy, research and communications initiatives to effect positive change at the federal, state and local levels.

To help achieve affordable broadband connectivity for all, the National Housing Conference (NHC) convened a Connectivity Working Group in 2014 to recommend policy changes. The group draws from affordable housing developers, public agencies, policy experts, capital providers, national intermediaries, and more, all committed to the shared mission of closing the digital divide for low-income people.

NHC met with your staff in 2015 to discuss our work on broadband in affordable housing and share our policy recommendations. We also submitted comments supporting the expansion of Lifeline to broadband with a role for housing providers.

II. Lifeline expansion to broadband can help close the digital divide

NHC supports the expansion of the Lifeline subsidy to include home broadband for low-income consumers. NHC's research brief (attached) on the digital divide shows that low-income renters

especially are stuck on the wrong side of the digital divide. Data collected by the Department of Housing and Urban Development (HUD) comes to a similar observation. **Only 43 percent of HUD-assisted renters had high-speed Internet service at home compared with 69 percent of un-assisted renters and 80 percent of homeowners.**¹ More tools and strategies, like the Lifeline subsidy, that help low-income households access broadband will help close this gap.

We need to address this gap because for many children, home Internet access as well as having a home laptop or desktop computer is becoming a requirement to complete homework and keep up with classwork. **For older adults, Internet access can provide important social connections and healthcare access. Additionally, more federal benefit programs are moving online, and for young adults, online training and education programs provide an important way to improve their earning potential.** Allowing the Lifeline subsidy to support broadband will help close the digital divide and encourage new partnerships that bring in the private sector in new and constructive ways.

III. Housing can help deliver broadband

NHC supports flexibility in the Lifeline program so that experienced qualified organizations can provide broadband alongside or in partnership with existing eligible telecommunications carriers. Allowing broadband-only providers into the program provides opportunity for innovation and locally-tailored solutions to expand broadband effectively. NHC encourages the FCC to maintain some form of the Lifeline Broadband Provider designation and the flexibility it provides to the program, particularly to allow housing organizations to participate. NHC understands changes may need to be made to the criteria and looks forward to working with you in that process.

Public housing agencies, for-profit, and non-profit entities all work at the local level providing subsidized housing to low-income households and could help ensure families living in subsidized housing who are eligible gain access to the Lifeline program. **Public housing authorities, operators of subsidized housing properties, and nonprofit community-based organizations are well-placed to verify consumers and help provide broadband.** These housing organizations already verify resident income as part of qualifying tenants, an eligibility process of long standing, well-monitored practice.

In many communities, housing organizations are pursuing alternative ways to provide home access to low-income consumers through wi-fi hot spots, mesh networks, and other emerging technologies. They also are generally well-known to and trusted by low-income consumers and therefore are able to market the program effectively. Encouraging PHAs, operators of subsidized housing, and community based nonprofits to become more involved in the Lifeline program could significantly reduce the digital divide for eligible residents and provide efficient ways of serving eligible low-income families.

¹ HUD Office of Policy Development and Research. "Digital Inequality and Low-Income Households." *Evidence Matters*. Fall 2016. <https://www.huduser.gov/portal/periodicals/em/fall16/highlight2.html>

IV. Conclusion and meeting request

NHC thanks you for your consideration of our comments and your work on closing the digital divide. We respectfully request a meeting with you or your staff to better understand how you plan to approach the Lifeline program and the role of housing providers with it. Please contact Rebekah King, policy associate (rking@nhc.org) to arrange a meeting with our policy staff.

Sincerely,

A handwritten signature in black ink that reads "Chris Estes". The signature is written in a cursive, flowing style.

Chris Estes
President and CEO