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REPLY COMMENT

April 15, 2022

Jessica Rosenworcel
Chair
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Affordable Connectivity Program, Docket No. 21-450

Dear Chair Rosenworcel,

On behalf of The Leadership Conference on Civil and Human Rights and its Media/Telecommunications Task Force, we write in response to the Request for Comment regarding the implementation of the Federal Communications Commission's (FCC's) Affordable Connectivity Program (ACP) to share our expertise and endorse the proposals submitted by Leadership Conference members National Urban League and National Hispanic Media Coalition.¹

The Leadership Conference is a coalition charged by its diverse membership of more than 230 national organizations to promote and protect the rights of all persons in the United States, and The Leadership Conference's Media/Telecommunications Task Force is committed to ensuring that all communities, especially the historically underserved, have access to affordable, reliable, high-quality advanced communications services. High-speed broadband is a necessity — not just a luxury — in the 21st century. It has become an integral platform for education, employment, health care, economic development, civic participation, and communications with family and friends. Low adoption of broadband internet service among communities of color, low-income households, and rural communities means that many vulnerable households are disproportionately excluded from full participation in our society and, thus, raises a critical equity and civil rights concern. The Leadership Conference and our task force members are well-positioned to offer a valuable civil rights perspective on how to implement an outreach grant program to expand enrollment in the Affordable Connectivity Program and bridge the digital divide.

¹ Comments of the National Urban League, Docket 21-450 (filed March 16, 2022), <https://www.fcc.gov/ecfs/file/download/DOC-5fe3ce68a5800000-A.pdf> (NUL); Comments of the National Hispanic Media Coalition, Docket No. 21-450, (filed March 16, 2022), <https://www.fcc.gov/ecfs/file/download/DOC-5fe4f19908400000-A.pdf> (NHMC).

The centrality of outreach in digital equity work cannot be overstated, and we laud the commission for seeking recommendations on an outreach program to efficiently and effectively educate and enroll eligible households in the ACP. This outreach grant program should prioritize funding for trusted messengers (*e.g.*, community-based organizations, local and state governments, faith-based organizations, public schools and libraries) familiar with the affected communities, because education and outreach programs must be culturally relevant to each particular community to maximize their success.² For example, these organizations and individuals can ensure greater language accessibility for non-English speaking populations through culturally relevant, in-language translation of outreach materials and resources in additional dialects.³

We urge the commission to adopt the approach recommended by the National Urban League and the National Hispanic Media Coalition and focus on providing grants to nonprofits with tax-exempt status under 26 U.S.C. 501(c)(3). More specifically, in providing grants, the commission should focus on: (1) anchor institutions that can run expert campaigns to increase awareness about ACP among vulnerable communities and to community navigator programs that assist in enrolling households in ACP;⁴ as well as (2) organizations with a demonstrated commitment and expertise in outreach in the targeted communities, namely low-income, communities of color, and non-English speaking people.⁵

In addition, we recommend the commission adopt the following elements in its ACP grant program:

- Smaller community-based organizations may not have the capacity or resources to efficiently navigate grant funding. Therefore, we urge the commission to allow subgrants, specifically by permitting national nonprofit intermediaries to apply for and regrant the funding to their community-based networks in various states and localities.⁶ These intermediaries can harness their infrastructure, expertise, and experience to help implement the program, centralize the dissemination of information and materials, and provide necessary assistance to ensure the success of the program.
- The commission should adopt multi-year grants because they “give organizations the ability to see the trajectory of federal projects and sufficient data to effectively measure results” and “build in the necessary time needed to onboard employees and to implement lessons learned from the on-ramp year.”⁷ Tiered grants would permit grantees to identify barriers and follow up on targeted efforts to overcome those barriers.⁸
- Fundable activities should include community events, mailers, radio and television broadcasts, paid advertisements, ethnic media, newsletters, social media, and other outreach targeted to the populations covered in the Infrastructure Investment and Jobs Act. These activities should include

² NHMC at 3-4.

³ *Id.*

⁴ *Id.* at 5

⁵ NUL at 4-5; NHMC at 3-4

⁶ NUL at 2-3.

⁷ *Id.* at 3.

⁸ *Id.* at 4.

consortiums and partnerships at the local level, including with other community-based organizations, local government, public libraries, faith-based organizations, and schools.⁹

- The commission should provide technical support to grantees. NUL offers an excellent description of resources that could support grantees in this work.¹⁰ NHMC similarly recommends the commission gather and analyze data or earmark grant monies to an organization with expertise in data collection and coordination.¹¹ Creating a feedback loop between grantees and the commission that: reviews materials; shares aggregated data and analysis; and documents and uplifts the stories of impacted community members will iteratively improve the grant program, highlight best practices over time, and permit grantees to accurately and efficiently focus their outreach and investment efforts on the most vulnerable households.
- The program should provide for the most productive and effective use of grant funds by creating a user-friendly platform that allows grantees to report their progress each month¹² as well as track financial reporting.¹³

Thank you for your consideration of our recommendations on the structure and implementation of the outreach grant program for ACP. We look forward to working with you on this issue and others of importance to our country. If you have any questions about this letter, please contact Media/Telecommunications Task Force Co-Chairs Cheryl Leanza, United Church of Christ Media Justice Ministry, at cleanza@alhmail.com, and Yosef Getachew, director of media and democracy program, Common Cause at YGetachew@commoncause.org, or Anita Banerji, Leadership Conference media/tech senior program director, at banerji@civilrights.org.

Sincerely,

The Leadership Conference on Civil and Human Rights
Asian Americans Advancing Justice - AAJC
Common Cause
Hispanic Federation
Japanese American Citizens League
League of United Latin American Citizens (LULAC)
National Consumer Law Center, on behalf of its low-income clients
National Hispanic Media Coalition
National Urban League
UnidosUS
United Church of Christ Media Justice Ministry

⁹ *Id.* at 3.

¹⁰ *Id.* at 4 (listing best practices webinars; data management; targeted information such as data regarding geographic locations where there is low broadband or program adoption; creation of a learning collaborative among grantees; outreach toolkits with graphics, sample social media, PowerPoints, one pagers, flyers, sample talking points).

¹¹ NHMC at 5-6.

¹² NUL at 5. For example, NUL explains that the Health Resources and Services Administration uses SurveyMonkey, the Small Business Administration uses Salesforce and the CDC created a tool called Redcap for data inputs. *Id.* See also NHMC at 4-5.

¹³ Combining financial tracking would help grantees monitor grant spending, invoices, payroll and other expenses in one place. NUL at 5.