



January 11, 2021

Ex Parte
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

In re: Emergency Broadband Fund Assistance, WC Docket No. 20-445

Dear Ms. Dortch,

In accordance with Section 1.1206(b) of the Commission's rules, on January 8, 2021 Greg Guice representing Public Knowledge (PK), Matt Wood (Free Press), Gigi Sohn (Georgetown Law Institute for Technology Law & Policy), Francella Ochillo (Next Century Cities), Josh Stager (Open Technology Institute), Jon Sallet (Benton Institute for Broadband & Society), Angela Siefer (National Digital Inclusion Alliance), Cheryl Leanza (A Learned Hand, LLC), Olivia Wein (National Consumer Law Center), Bertram Lee Jr. (The Leadership Conference on Civil and Human Rights), Dr. Dominique Harrison (Joint Center), Steven Renderos (MediaJustice), Brandon Forester (MediaJustice), and Adam Echelman (Libraries Without Borders) met with Commissioner Geoffrey Starks, Austin Bonner, Alisa Valentin, and Bill Davenport via conference call on January 8, 2021. The purpose of the meeting was to discuss four areas of concern regarding the parameters of the proposed Emergency Broadband Relief program.

Identifying Eligible Participants: The group discussed the four categories of eligible participants of the Emergency Broadband Relief Program and the need to ensure that the Commission's order defining the requirements for participation takes into account the challenges in reaching these potential recipients. In particular, the groups discussed the need for the Commission to consider how it can work with federal agencies and state governments that may have information to assist in not only determining eligibility for school lunch households, Pell grant recipients, and those recently unemployed or furloughed, but also how it can work to inform these participants of the opportunity this program presents. Regarding Lifeline-eligible participants, the groups urged the Commission to consider other means of verifying eligibility given the shortcomings of the National Verifier database regarding these new categories of eligibility.



Eligibility Awareness: The group discussed different outreach efforts that could be used to promote awareness for the Broadband Emergency Relief Program. The FCC can ensure eligible individuals are notified by allocating a portion of the administrative funds to marketing campaigns through a diverse set of media outlets targeting all eligible participants and minority audiences. The groups recommended working with state and local agencies, governments, and non-profit organizations that have assisted with or provided pandemic relief, encouraging them to pass information along to ensure potential qualifying candidates receive notification of the emergency broadband relief program.

In addition, the FCC should work with USAC and the FCC's Consumer and Government Affairs Bureau to develop "plug and play" materials that are clear, concise, and easy to understand, to be made available for marketing purposes for all entities trying to inform eligible participants of the program. The groups noted that these efforts could complement outreach by participating providers, which should be a required component of participation.

Provider Participation: The groups recommended that the FCC set forth criteria for new entrants to participate in the program that encourages participation by a broad array of providers. This will require the Commission to establish criteria for non-eligible telecommunications carriers. Such criteria should encourage, and not deter, providers from applying, while balancing the need to ensure the providers are capable of providing broadband service to the consumers in a timely manner after receiving approval to participate.

Continuation of Program Post Funding Exhaustion: The group discussed what steps need to be taken to prepare for a potential lapse in funding after the exhaustion of the designated \$3.2 billion. To assist in this effort, the group recommended that periodic reporting by providers to USAC on participation levels throughout the course of the program will assist in understanding how much funding remains available. In addition, providers will need to establish consumer notification mechanisms to ensure that program participants are aware of the potential for a funding lapse. Before the program expires, program participants should be provided with advance notice to assess the options to maintain service and not be transitioned, without clear consent, to help protect consumers from enrollment into a broadband service offering the participant is unable to afford. Moreover, to the extent participants in the emergency broadband relief program are eligible for Lifeline, such eligibility should be made clear as part of the notice given about funding exhaustion.

Respectfully submitted,



/s/ Gregory Guice

Director of Government Affairs

/s/ Montana Williams

Policy Fellow

Public Knowledge

1818 N. St, NW

Suite 410

Washington, D.C. 20036

(202) 861-0020

cc: Austin Bonner
Alisa Valentin
Bill Davenport
Matt Wood
Gigi Sohn
Francella Ochillo
Josh Stager
Jon Sallet
Angela Siefer
Cheryl Leanza
Olivia Wein
Bertram Lee Jr.
Dr. Dominique Harrison
Steven Renderos
Brandon Forester
Adam Echelman