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U.S. DEPARTMENT OF COMMERCE
Washington, DC 20230

In the Matter of	)
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Agency Information Collection	)
Activities; Submission to the Office of	)
Management and Budget (OMB) for	)
Review and Approval; Comment	)
Request; NTIA Internet Use Survey	)

COMMENTS OF DIGITAL EQUITY RESEARCHERS

<u>Contributing Research Organizations:</u>
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On June 2, 2023, the National Telecommunications and Information Administration (NTIA) invited comment on proposed and continuing information collection to help the agency fulfill its mandate to assess the impact of its proposed and continuing information collection requirements, while minimizing reporting burdens to the extent possible.[1] The recommendations that follow represent the collective input from over a dozen researchers (Contributors) from leading academic institutions and non-profit organizations, with decades of experience researching various aspects of the digital divide. Their credentials are set out in Appendix A.

The Infrastructure Investment and Jobs Act (IIJA)[2] provided for significant new investment, not just in broadband infrastructure, but also in affordability and digital equity. The NTIA Internet Use Survey (Survey) is an essential data source for closing the Digital Divide. Contributors, like many researchers across the Nation, rely heavily on the data collected through the Survey. That data is used to help recommend policies and develop programs to ensure everyone in the United States benefits from universal, high-performance broadband. The data collected through the Survey can serve to answer digital equity questions over the next five years. It can help measure whether "*all* people and communities have the skills, technology and capacity to reap the full benefits of our digital economy."[3]

To fulfill NTIA's newly expanded mandate, it is essential to revisit the framing of the Survey to ensure that it is not only responsive to the changing nature of digital

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[1] *Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; NTIA Internet Use Survey*, 88 Federal Register 38282 (June 2, 2023). National Telecommunications
[2] Pub. L. No. 117-58 (2022).
[3] IIJA, §60302(10) emphasis added.

technology and its place in our lives, but also that it allow long term analysis to measure the value and impact of IIJA investment. This information is essential for compliance with old and new statutory obligations. The recommended modifications would not seek nonessential or superfluous information not material to compliance with NTIA's mandate; The proposed changes include removal of several obsolete questions, thereby advancing the goals of the Paperwork Reduction Act.

Recommendations

The request for comments asks for suggestions to "enhance the quality, utility, and clarity of the information to be collected." With that in mind, Commenters recommend the following:

1.   The survey should focus on understanding the frictions in use, in terms of devices, subscriptions and skills, to fully comply with the statutory mandate.

Through questions such as DEVQUA and HNETST, the current survey draft poses important questions that attempt to capture frictions in internet use, an essential aspect of understanding how difficult it can be for people to use digital technology. Commenters support that effort but recommend a modified approach and additional questions in this vein.

- DEVQUA as currently written applies to all household devices and does not provide for distinction between whether one of several household devices is unreliable or whether a single household device is in need of constant repair. Since the goal is to understand the quality of devices people are able to access, Commenters recommend asking either about a primary device or how *often* such device(s) do not work properly.
- Another aspect of friction of use relates to not just how devices work, but *how well people are able to work the devices*. Thus, Commenters recommend an additional question asking respondents "how often they need help getting devices to work correctly." This echoes the National Skills Coalition which has argued for additional questions that capture digital skills.
- The National Skills Coalition also recommends asking a question probing who people turn to *when they do not know how* to do a digital task. Commenters support inclusion of such a question.

- The current draft of questions edits the question format for DEVSTA. In 2021, the question asked was "how often" someone was unable to use a device, while the current draft poses it as a Yes/No question. Commenters recommend retaining the previous version of the question, thus allowing greater nuance in understanding users' access to devices.
- HNETST as currently written attempts to capture subscription vulnerability, whether people have lost internet service due to an inability to pay. That may fail to capture when people had to forego other needs in order to afford service. It may also fail to capture when people downgraded service to a slower tier or switched to mobile service because of the high cost. In order to fully measure whether broadband is affordable for people, Commenters recommend reframing the question by asking "In the past six months, have you ever had to cut or reduce your internet service to save money / because it was too expensive"?

2.   The survey should gather data about the affordability and quality of internet services available.

- Affordability: Through the IIJA, Congress authorized the Affordable Connectivity Program (ACP),[4] a landmark broadband assistance program for low-income families that provides a subsidy to help defray the cost of service and devices. Approximately 20 million families are enrolled in the ACP. Although the Universal Service Administrative Corporation makes some important data available on these enrollments, the Internet Use Survey must go further to gauge broad awareness and utilization of the program, disaggregated by demographic and other data in the ACS. Commenters recommend two additional questions:
  - On awareness: Have you heard of the Affordable Connectivity Program? [Yes/No]
  - On enrollment: (If Yes) Have you enrolled in or tried to enroll in the ACP? Answer Options: Yes, I have enrolled; Yes, I have tried to enroll and was unable to complete the application; No, I have not tried to enroll yet, No I am not eligible to enroll
- Service Quality: Currently, HNETQL is focused on the quality of service using terms like speed, reliability, and data caps, but could be better framed to address users' ongoing experience with their service. It is better to ask respondents *how often* their internet service is of poor quality, either too slow, inconsistent, or otherwise not good enough.
- NOHM: This question seems to have changed very little in the past decade, while reasons for not subscribing to home high-speed internet may now be

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[4] IIJA. §60502.

different. Commenters suggest a complete revision that allows for the following choices:
- The monthly cost of a home internet subscription is too expensive
- The cost of a computer is too expensive
- My smartphone lets you do everything online that you need to do
- I have other options for internet access outside of your home
- I cannot get internet service installed at my residence
- I worry about the privacy and security of my personal data
- I am not comfortable using a computer or the internet
- I do not want or need high-speed internet service at home
- I have past-due bills to internet service providers
- It is too complicated to sign up
- Some other reason I haven't already mentioned

**3.	The survey should include questions about digital skills and literacy among respondents.**

- Use vs. Outcomes: Increased investment in broadband and digital equity is meant to contribute to an equitable economy and a thriving society. The Survey provides the opportunity to gather data on the outcomes of increasing internet use.
  - Commenters recommend questions employ attitudinal scales, asking about how important internet access was in helping respondents find jobs, manage their healthcare, etc.
  - Commenters also recommend adding questions about civic engagement and internet use. This could also include questions about the reliability and validity of information people encounter online, including users' self-assessment of their own media literacy.
  - PSCON is a critical question, but its open-ended pre-coded format needs to be revised for greater precision. Asking people "online privacy and security risks" is challenging enough, but simply asking which is most concerning is an added challenge. A better framing would be a question that asks, "How concerned, if at all, are you by the following online privacy and security risks?" The response set could be a 4-point scale (very, somewhat, not very, not at all)

**4.	The survey should ensure the data collected can be disaggregated by the covered populations outlined by the IIJA.**
- The Digital Equity NOFO and the Broadband Equity Access and Deployment NOFO identify both covered populations and underrepresented communities,

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identity groups and communities that are disproportionately impacted by digital inequity. Data collection should ensure disaggregation by all these groups.

5.   Several smaller edits to the survey questions will improve the precision and usability of the data collected.

- For INLICO, when asking respondents about using the internet in libraries or community centers, Commenters recommend removing "or other public places". The meaning of "other public places" is unclear here, because respondents may understand it as referring to private businesses. Limiting the question to libraries and community centers would allow us to understand the impact of publicly funded institutions on internet access.
- For EGOVTS, Commenters recommend offering examples of accessing government services used more frequently, for instance social security benefits, looking up city bus schedules, renewing drivers' licenses, etc.
- HOMIOT - The question could be simplified by asking whether respondents own smart appliances, by definition, those devices are continually connected to their network.
- With regards to MEDREC and MEDDOC, a more useful distinction between internet uses for health services would be between "activities that are live and interactive" and "activities that relate to scheduling, billing, messaging, and record management". Commenters recommend including scheduling appointments within MEDREC and using MEDDOC to measure tele-health visits specifically.

6.   The request for comment asks for recommendations to minimize the reporting burden on respondents. With that in mind, we suggest that some of the existing questions within the survey can be deleted.

- Questions about locations of internet use, in particular INCAFE, INTRAV, INELHO, offer little insight about patterns of internet use and could be deleted. It may also be possible to condense these questions into a single one asking people to identify their *primary* location for internet use.
- As internet use evolves, there is also an opportunity for NTIA to phase out or condense some questions about use, such as TEXTIM. A distinction between desktop and laptop computing is increasingly less relevant and we recommend DESKTP and LAPTOP could be combined. AUDIO and VIDEO can also similarly be combined.

CONCLUSION

Congress has given NTIA the directive, and the power, to transform broadband

connectivity in our country. Commenters hope these comments will be of use to NTIA

and its hard-working staff as it fulfills its mandate to measure the Nation's progress towards universal broadband access, affordability, adoption, and application.

Respectfully submitted,

Benton Institute for Broadband & Society Director of Research and Fellowships Revati Prasad Benton Senior Fellow John Horrigan

Common Sense Media Head of Research Amanda Lenhart

Institute for Local Self-Reliance Associate Director for Research Ry Marcattilio-McCracken

The Pew Charitable Trusts Broadband Access Initiative Director Kathryn de Wit

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Erezi Ogbo, Assistant Professor of Information Science and the Director of Extended Studies at North Carolina Central University

Brian Whitacre is a professor and Neustadt Chair in the Department of Agricultural Economics at Oklahoma State University

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Appendix A: Contributing Researchers

Benton Institute for Broadband & Society Director of Research and Fellowships Revati Prasad supports scholars, practitioners and advocates doing critical research about the future of broadband. Previously, she was an American Council for Learned Societies Leading Edge Fellow at the Institute for Local Self-Reliance studying efforts by indigenous communities to improve broadband access for themselves. Dr. Prasad holds a Ph.D. in Communication from the Annenberg School for Communication at the University of Pennsylvania and an MPA from Columbia University's School of International and Public Affairs. Her doctoral work examined efforts to "connect the unconnected" in rural India, including telecommunications policy, infrastructure projects, and small networks run by WISPs. Dr. Prasad's research has been published in *Media, Culture & Society*, *Information, Culture & Society*, *Communication, Culture and Critique*, and *Journalism*. She has received awards from the Global Communication and Social Change and the Media Industries Divisions of the International Communication Association.

Benton Senior Fellow John Horrigan is a national expert on technology adoption, digital inclusion, and evaluating the outcomes and impacts of programs designed to promote communications technology adoption and use. He served at the Federal Communications Commission as a member of the leadership team for the development of the National Broadband Plan. Additionally, as an Associate Director for Research at the Pew Research Center, he focused on libraries and their impact on communities, as well as technology adoption

patterns and open government data. Earlier in his career, Horrigan was a staff officer for the Board on Science, Technology, and Economic Policy at the National Research Council. Horrigan received his Ph.D. in public policy from the University of Texas at Austin and his B.A. in government and economics from the University of Virginia.

Amanda Lenhart is the Head of Research at Common Sense Media. She has spent her career studying how technology affects human lives, with a special focus on families and children. She began her career at the Pew Research Center, pioneering the Center's work studying how teens and families use social and mobile technologies, and has more than two decades of expertise in designing surveys for children and adults on technology and media topics. Amanda specializes in translating rigorous research for a broad national audience. Dedicated to public communication, she has testified before congressional subcommittees and the Federal Trade Commission. Amanda serves on numerous advisory boards and working groups including groups focused on AR/VR and children and the Technical Advisory Panel to the American Academy of Pediatrics Center on Social Media and Youth Mental Health. She also advised the Smithsonian Museum of Natural History on the development of a new exhibit on mobile phones.

Ry Marcattilio-McCracken is the Associate Director for Research with the Institute for Local Self-Reliance's Community Broadband Networks Initiative. He is interested in the democratizing power of technology, systems engineering, and the history of science, technology, and medicine. Previously, Ry

worked as an Adjunct Professor of American History in Oklahoma, Rhode Island, and Minnesota. Ry holds a Ph.D. in American History from Oklahoma State University.

Kathryn de Wit directs The Pew Charitable Trusts' broadband access initiative, which works to accelerate efforts to connect millions of Americans to affordable, reliable high-speed internet. In addition to working with policymakers, researchers, and other stakeholders to improve policy outcomes, de Wit's work also includes addressing research gaps and bringing together stakeholders for data-driven discussions about how to ensure that every American benefits from universal connectivity. Before joining Pew, de Wit was an associate with Booz Allen Hamilton, where she focused on broadband deployment, organizational management, and public affairs. She was also a senior fellow with the Heinz Endowments, leading projects on youth philanthropy and community engagement. De Wit holds bachelor's degrees in communications and sociology from Penn State University and a master's in public administration from the University of Pittsburgh.

Colin Rhinesmith (he/him) is the Founder and Director of the Digital Equity Research Center at the Metropolitan New York Library Council. He is also a Research Fellow with the Quello Center for Media and Information Policy at Michigan State University and Co-Editor-In-Chief of The Journal of Community Informatics. Previously, Dr. Rhinesmith was an Associate Professor in the School of Library and Information Science at Simmons University. He has been a Google Policy Fellow and an Adjunct Research Fellow with New America's Open

Technology Institute and a Faculty Associate with the Berkman Klein Center for Internet & Society at Harvard University. Dr. Rhinesmith received his Ph.D. in Library and Information Science from the University of Illinois at Urbana-Champaign, where he was an Institute of Museum and Library Services Information in Society Fellow, a Researcher with the Center for People and Infrastructures, and a Research Scholar with the Center for Digital Inclusion.

Alexis Schrubbe is the Director of the Internet Equity Initiative at the University of Chicago's Data Science Institute. She is a former Program Manager of Merit Network's Michigan Moonshot, a data-driven approach to empower communities through the plan-build-run and digital equity and inclusion process. She completed her PhD at the University of Texas, where she also was a postdoctoral researcher at the Technology and Information Policy Institute.

Erezi Ogbo is an Assistant Professor of Information Science and the Director of Extended Studies at North Carolina Central University (NCCU) in the School of Library and Information Science and a Marjorie & Charles Benton Opportunity Fund Fellow. Previously, she was a postdoctoral research associate at the University of Southern California. Her research studies the digital divides, user acceptance of technology, and technology's impact among marginalized populations. Erezi has received numerous awards for her work including: the Charles Benton Early Career Scholar Award (2022) by the Benton Institute in partnership with the Research Conference on Communications, Information, and Internet Policy (TPRC); the Young Scholar Award (2022) by the Pacific Telecommunications Council; and the Robert Dunlap Award by the

Department of Engineering and Public Policy at Carnegie Mellon University. In 2014, Erezi was recognized as a promising young scholar by the Federal Government of Nigeria and awarded the Presidential Special Scholarship for Innovation and Development. Erezi earned her PhD in Engineering and Public Policy at Carnegie Mellon University, and holds degrees from the University of St Andrews, Scotland and Bells University of Technology, Nigeria.

Brian Whitacre is a professor and Neustadt Chair in the Department of Agricultural Economics at Oklahoma State University. He is widely recognized as a national expert on the economic impacts of rural broadband availability and adoption. He has published over 50 peer-reviewed journal articles on this topic and has won national outreach awards for his programs helping rural communities to take advantage of the internet. Whitacre holds a Ph.D. from Virginia Tech and serves as the chair of Oklahoma's Broadband Expansion Council.