



June 3, 2015

National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Attn: Broadband Opportunity Council
Washington, D.C. 20230

Docket No. 1540414365-5365-01 Broadband Opportunity Council Notice and Request for Comment

The National Housing Conference (NHC) appreciates the opportunity to share our perspective and make recommendations on what the federal government can do to promote broadband across the country. Among the areas the Broadband Opportunity Council has identified, NHC offers comments on ways to promote broadband adoption (III.D.), ways to promote public and private investment in broadband (III.C.) and issues related to vulnerable communities and communities with limited or no broadband (III.F.).

1. About the National Housing Conference and its Connectivity Working Group

The National Housing Conference represents a diverse membership of housing stakeholders including tenant advocates, mortgage bankers, non-profit and for-profit home builders, property managers, policy practitioners, realtors, equity investors, and more, all of whom share a commitment to safe, decent and affordable housing for all in America. We are the nation's oldest housing advocacy organization, dedicated to the affordable housing mission since our founding in 1931. As a nonpartisan, 501(c) 3 nonprofit, we are a research and education resource working to advance housing policy at all levels of government in order to improve housing outcomes for all in this country.

To help achieve affordable broadband connectivity for all, the National Housing Conference (NHC) convened a Connectivity Working Group 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. The recommendations presented in our comments draw on the expertise of the Connectivity Working Group, the policy briefs from NHC's Center for Housing Policy, and advice from other stakeholders. We recognize that achieving broadband connectivity for all will require action by many, including Congress, the President, the Federal Communications Commission (FCC), the Department of Housing and Urban Development (HUD), the Department of Agriculture, internet service providers, state and local governments, and more.

2. Ways to promote broadband adoption (III.D.)

Within affordable housing, one way to promote broadband adoption would be to set a national goal for connectivity in HUD and USDA properties as part of a national connectivity goal. With a strong federal

commitment of new resources and partnerships with the private sector, we believe all HUD-assisted and USDA-assisted rental housing properties could have affordable, cost-effective, basic broadband connectivity for all residents by 2020, improving rates of broadband adoption nationally and for vulnerable populations. There are innovative solutions in public housing and privately-owned assisted housing that we could encourage others to adopt. If states commit to this goal as well, we could also reach all Low Income Housing Tax Credit properties. Aligning broadband connectivity with existing initiatives such as Choice Neighborhoods and Promise Zones may help pave the way, but achieving the national goal will ultimately require a concerted effort nationwide.

3. Ways to promote public and private investment in broadband (III.C.)

Private businesses can be part of the solution to the digital divide, through both corporate philanthropy and private investment for business purposes at the large and small scale. In-home connectivity can make property management more efficient for multifamily housing, deliver health care services efficiently and allow telecommuting for workers. It can also bring low-income people into the economic mainstream as workers, consumers and entrepreneurs. Scarce public resources should therefore leverage private contributions, of which there are many models, including community development financial institutions, tax credit incentives, loan pools and in-kind contributions. Examples include Google Fiber projects in Austin and Comcast's Internet Essentials program.

4. Issues related to vulnerable communities (III.F.)

Most of us use the Internet in all facets of our lives: for work, education, medical care, entertainment, shopping, and innumerable daily tasks. Having a reliable broadband connection at home makes all sorts of tasks easier, faster and cheaper. Yet far too many low-income households do not have even a basic broadband connection at home, as we describe in the accompanying research brief: "The Connectivity Gap: The Internet is Still Out of Reach for Many Low-Income Renters." Fifty-four percent of extremely low-income renters (earning 30% of area median income or less) do not have home Internet access. Making sure all households have an affordable connection plus the computing device and the digital literacy to best use it will create new economic opportunities: for households moving toward self-sufficiency, for kids achieving in school, for businesses reaching new markets, and for communities building a higher-skilled workforce. NHC has four recommendations specifically related to affordable housing that would improve Internet access for low-income households.

Treat broadband as an eligible expenditure in affordable rental housing. As pilot programs are demonstrating, basic broadband provided at the property level can serve residents effectively while containing costs. HUD should issue guidance allowing properties to use available funds to implement cost-effective connectivity for residents and should support pilot programs to test different implementation methods. Building on these initial steps, HUD should explore treating cost-effective basic broadband as a standard operating cost for affordable housing properties.

Implement digital literacy and equipment support into broadband provision. For access to broadband to transform lives, it must be more than just a plug in the wall or a wireless access point. Low-income residents need access to reliable equipment (particularly computers or tablets, not just smartphones, for a full range of education and work-related activities) and training in how to make the most of it. Successful examples of these solutions combine small contributions from residents with grants and owner contributions so that all share a commitment to the success of the effort.

Support broadband in affordable housing through FCC actions. The Federal Communications Commission (FCC) is uniquely positioned to reduce costs of broadband service for low-income households, encourage public-private partnerships to serve low-income communities, and make broadband part of coordinated neighborhood transformation strategies. For example, as the FCC considers different mergers, it should require companies to:

- a. Work with HUD, state and local housing agencies, and affordable housing stakeholders to implement broadband access in publicly-subsidized housing developments including public housing, Section 8, Low Income Housing Tax Credit, and others.
- b. Contribute to independent funds to support broadband adoption at home and implement strategies to improve and expand Comcast's Internet Essential program to all low-income families and individuals.
- c. Upgrade infrastructure in underserved areas and extend into unserved communities to improve broadband deployment, with special attention to low-income neighborhoods and multifamily buildings serving households below median income.
- d. Ensure that provider-supported connectivity programs reach all people in need, especially seniors and people with disabilities who may not be captured by school-related criteria for eligibility.

Provide federal funds to support broadband connectivity in affordable housing. Existing resources are not sufficient to accomplish all that is needed, including capital installation, ongoing operation, equipment, digital literacy training, and technical support. As part of annual appropriations, Congress should allocate additional funding for public and assisted housing to pay for broadband costs in property operations, as well as large-scale pilots to refine best practices for implementing broadband at a property level. Tax incentives are an alternative mechanism for defraying cost of broadband connectivity in affordable housing, if properly structured in a pay-for-performance model and not diverted from existing affordable housing programs.

5. Conclusion

NHC appreciates this opportunity to comment on federal efforts to increase and improve broadband across the country and hopes our comments related to affordable housing are helpful. Please contact Rebekah King, Policy Associate (rking@nhc.org) with any questions.

Sincerely,



Chris Estes
President and CEO