INTERGOVERNMENTAL ADVISORY COMMITTEE

to the

FEDERAL COMMUNICATIONS COMMISSION

ADVISORY RECOMMENDATION No. 2022-2

In the Matter of Effective Affordable Connectivity Program Outreach

I. INTRODUCTION

The Federal Communications Commission (FCC) has charged the Intergovernmental Advisory Committee (IAC) with producing a report presenting ideas and best practices to enhance Affordable Connectivity Program (ACP) outreach efforts in order to (i) better ensure state, local and Tribal officials are aware of the ACP and encourage enrollment by eligible households; (ii) help these officials understand their roles as articulated in the Infrastructure Investment and Jobs Act (IIJA) and the Commission's Report and Order establishing the ACP; and (iii) recommend ideas or best practices to assist consumers in applying for and receiving the benefit.

This report reviews non-FCC[1] federal, state, local and Tribal efforts to promote ACP awareness and consumer enrollment. Based on those assessments, the Report presents the IAC's recommendations and conclusions, summarized as follows:

1. "All of Government" outreach approaches, though not absolutely required, are very effective, especially in the early stages of an awareness campaign, to maximize ACP awareness.
2. Stakeholders should study, adopt and leverage the work of other governmental stakeholders to advance the cause of ACP awareness without "pride of authorship."
3. Stakeholders should nonetheless use initiative and creativity based on unique aspects and features within their jurisdictions to enhance ACP awareness.
4. The tools that are designed for, and contribute to, government transparency and trust are precisely the tools to leverage for ACP awareness, though not the only ones.
5. Stakeholders should measure the effectiveness of their awareness campaigns to ensure accuracy of information, penetration with the targeted populations, and efficient enrollment by eligible persons.

II. BACKGROUND

A. Affordable Connectivity Program Overview

The ACP is a $14.2 billion federal program created in 2021 through the Infrastructure Investment and Jobs Act (IIJA) to help low-income households pay for internet service and connected internet devices.[2] The Universal Service Administrative Company (USAC), under the oversight of the Federal Communications Commission (FCC), is designated as the program administrator.

The ACP helps ensure that low-income consumers can afford the broadband they need for work, school, healthcare and more by providing a discount of up to $30 per month toward internet service for eligible households and up to $75 per month for households on qualifying Tribal lands. Eligible households can also receive a one-time discount of up to $100 to purchase a laptop, desktop computer, or tablet from participating providers if they contribute more than $10 and less than $50 toward the purchase price. The ACP is limited to one monthly service discount and one device discount per household. A household is eligible for the ACP if household income is at or below 200% of the Federal Poverty Guidelines, or if a member of the household participates in, or receives benefits from, the FCC's Lifeline

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[1] The FCC did not request that the IAC evaluate and comment on the FCC's own ACP outreach efforts and consequently, this report catalogs only non-FCC federal ACP outreach activities in Section III.A. That said, the IAC recognizes the FCC's comprehensive efforts to establish, administer, promote awareness of and encourage and facilitate enrolment in, the ACP pursuant to its charge in the IIJA. These efforts include, but are not limited to, providing substantial input in, assistance with, and partnership for virtually all other governmental ACP outreach efforts described in this Report. Notwithstanding, in Section III.E, the Report describes FCC, ACP and related Lifeline outreach efforts on Tribal lands to give a complete picture of targeted Tribal outreach efforts.

[2] On December 31, 2021, the ACP replaced the Emergency Broadband Benefit (EBB) Program and began accepting consumer applications.

universal service program, SNAP, Medicaid, WIC, Supplemental Security Income, Federal Housing Assistance, Veterans Pension and Survivors Benefit, Free and Reduced-Price School Lunch Program or School Breakfast Program, including U.S. Department of Agriculture Community Eligibility Provision schools or if they received a Federal Pell Grant in the current award year). Qualification guidelines as well as full ACP program details can be found at https://www.affordableconnectivity.gov/.[3]

19 million Americans nationwide still do not subscribe to broadband with baseline speeds, according to the FCC. The greatest share comes from households earning less than $30,000 a year.

The White House declared in May 2022 that "high-speed internet service is no longer a luxury—it's a necessity." But too many families go without high-speed internet because of the cost or they have to cut back on other essentials to make their monthly internet service payments. Lowering prices—including the cost of high-speed internet service—is a top priority of this Administration.

To address this critical "necessity" for low-income families across the nation, Congress, through the IIJA, called for the Commission to establish – and the Commission did establish – the ACP which, as the White House has stated, is "the largest high-speed internet affordability program in our nation's history."

The scale and scope of the ACP's target is significant. Indeed, the White House, citing expert estimates, has declared that "48 million households—or nearly 40% of households in the country—qualify for the ACP, either because their income is at or below 200% of the Federal Poverty Level or because a member of the household meets one" of several other low-income-based ACP eligibility criteria. To help counter this inequity and facilitate the goals of the ACP, efforts underway include:

- The launching of www.GetInternet.gov;
- Outreach to eligible households through federal agencies;
- Partnerships with cities, states, and Tribal organizations; and
- Collaborations with public interest organizations.

The importance of connectivity was starkly evident during the COVID-19 pandemic. Researchers at Digital Planet, a research initiative at The Fletcher School at Tufts University, found that just a 1% increase in broadband access nationwide lowered Covid-19 mortality by about 19 deaths per 100,000.

Having established the ACP per the IIJA's requirements, the Commission is committed to ensuring the fullest awareness of the ACP that can be achieved. In keeping with that goal, the Commission has established an Outreach Grant Program per the IIJA, and, through the IAC, has made an effort to identify best outreach practices and ideas to be used throughout the Nation to ensure that all eligible consumers are aware of the benefit, have easy access to enrollment information, and have as few impediments to actual ACP enrollment as possible.

B. The Role of Local Internet Service Providers (ISPs) in ACP Outreach

For many years now, broadband providers have engaged in broadband infrastructure buildout under a patchwork of politically shifting federal and state legislative and regulatory frameworks. Only

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[3] USAC offers directions on How to Apply for ACP here. Also, USAC provides the following outreach materials on the Community Resources webpage for partners to print and handout: ACP Outreach Toolkit; Consumer Toolkit; ACP Brochure (digital); ACP Brochure (print); ACP Tribal Flyer; and Social Media Image Files.

recently, with the Biden Administration's pronounced focus on broadband, has a more comprehensive federal approach come into play.

So how can we make sure the lower tiers of our economic populations don't get left out, as often happens in hyper-competitive marketplaces? The ACP is meant to do just that. With a $14.2 billion injection into the broadband marketplace, people with limited or no access to the internet can now become connected through subsidized services. This will allow them to take advantage of the education, health care, and job recruiting opportunities they have been missing.

Providers across the country have responded to the call and are offering low- or no-cost internet services based on their unique systems and the areas they serve. The ACP contributes up to $30 per month toward covered broadband service, and many broadband providers have built ACP into their local programs, with some discounting their existing programs and offering 'Zero' cost programs in their competitive efforts. In recognition of the unique and inherent internet service challenges associated with typically large geography on Tribal lands, the ACP offers an enhanced Tribal benefit of $75 per month on qualifying Tribal lands to ensure internet service to qualifying households on these lands.[4] Consumers may find an ACP provider in their area by using the Companies Near Me tool, found at https://www.affordableconnectivity.gov/companies-near-me/, as well as information on the availability of discounted devices and plans free with the ACP benefit.[5]

The IIJA and the Commission's ACP rules require participating providers to engage in certain types of outreach. Providers must (1) publicize the availability of the ACP "in a manner reasonably designed to reach those likely to qualify for the service and in a manner that is accessible to individuals with disabilities;" (2) notify consumers who subscribe to or renew internet service about the ACP and how to enroll; and (3) frequently carry out public awareness campaigns highlighting the value and benefits of broadband internet access service and the existence of the ACP in collaboration with state agencies, public interest groups, and non-profit organizations.[6] Many providers have taken significant steps to update their customer care, customer-facing online sites, and phone intake systems to ensure consumer awareness of the ACP. In doing so, they have enabled and facilitated enrollment for qualifying consumers, and have otherwise taken documented steps to reach out to their customers who are, or are likely to be, ACP-eligible to ensure they take advantage of ACP's benefits.

The IAC recognizes that outreach by state, local, and Tribal officials and entities often works in tandem or in parallel, if not in partnership, with providers' activities to promote ACP awareness and enrollment. In this regard, the IAC considers outreach best practices as being enhanced to the extent they make consumers aware not only of the ACP, but also of participating providers serving their areas with which they would presumably be familiar.

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[4] The ACP's Enhanced Tribal Benefit is available to qualifying households on qualifying Tribal lands. "Tribal lands" include "any federally recognized Indian tribe's reservation, pueblo, or colony, including former reservations in Oklahoma; Alaska Native regions established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688); Indian allotments; Hawaiian Home Lands - areas held in trust for Native Hawaiians by the State of Hawaii, pursuant to the Hawaiian Homes Commission Act, 1920 July 9, 1921, 42 Stat. 108, *et. seq.*, as amended; and any land designated as such by the Commission for purposes of subpart E pursuant to the designation process in § 54.412." 47 CFR § 54.1800(s). USAC provides information on the Enhanced Tribal Benefit on its Enhanced Tribal Benefit webpage.

[5] The FCC maintains an up-to-date, comprehensive, state-by-state list of such providers at its ACP web page, here.

[6] *See* 47 CFR § 54.1804(b)-(d); *Affordable Connectivity Program, Emergency Broadband Benefit Program*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 21-450, 20-445, FCC 22-2, at 92, 95-96, paras. 200, 205-207 (2022).

C. Scope of this Report

Objectively, the "best" practices are those that measurably (i) make the targeted populations aware of the ACP, (ii) provide those persons with accurate, up-to-date ACP eligibility and enrollment information, and (iii) connect them with the program's apparatus efficiently for enrollment or to get key questions answered. In order to make a meaningful recommendation to the Commission about which or what ACP outreach and awareness practices are "best," the IAC would need to review effectiveness and assurance data associated with the outreach programs and efforts reviewed. That data, largely because of the newness of the program, doesn't exist yet. Instead, there is some ability to extrapolate from available enrollment figures a general idea of potentially effective outreach, but that data does not nearly provide causality insight such that the IAC could reach conclusions about "best outreach practices." That doesn't render existing ACP enrollment data irrelevant. However, without more, the data can only support speculative endorsement.

Accordingly, the IAC has (i) ascertained what ACP outreach efforts have been taken,[7] or are being taken, to date by governmental stakeholders, (ii) presumed those efforts' value, in relative terms, in promoting or ensuring awareness of, and facilitating enrollment in, the Program, and (iii) identified post-outreach effectiveness assurance practices that would assist governmental stakeholders in determining, objectively, the effectiveness of their ACP awareness campaigns in advancing the goals of ACP outreach (i.e., "best practices").

III. DISCUSSION

A. Non-FCC Federal ACP Outreach Efforts

Unsurprisingly, other federal government agencies have made significant efforts to ensure ACP awareness by the program's intended recipients and that these potential beneficiaries know how to sign up or to get answers to their questions about the program.[8] In addition to their effectiveness in enhancing ACP awareness and enrollment, these efforts (press conferences, program communications, outreach partnerships, etc.) can also serve as a foundation for states, counties, municipalities, and tribes to tailor outreach to their own communities. Below are some of the efforts to date.

1. Social Security Administration ("SSA")

The SSA's home page, https://www.ssa.gov, displays a topic headline "The Affordable Connectivity Program", which provides a link to the SSA's web page, "Social Security Matters" and its guest blog entitled: "People Facing Barriers." The site features a guest blog from the FCC's Consumer and Governmental Affairs Bureau's Chief, Alejandro Roark, entitled "The Affordable Connectivity Program Can Help SSI Recipients Get Internet Access." The post provides eligibility and general program information, links to the FCC's (USAC's) ACP website, and what number to call or e-mail to write in order to obtain further info about the ACP. In two or three clicks, one can obtain all of the core ACP content. In September 2022, the SSA emailed all 1.7 million Supplemental Security Income "*my* Social Security" account holders advising them of their ACP eligibility. In addition, SSA emailed approximately 27 million social security beneficiaries to provide information about the Affordable Connectivity Program and links to apply. The SSA has also run ACP Public Service Announcements

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[7] The outreach and awareness programs and activities described in this Report are a comprehensive, but not exhaustive, list of all such efforts – past, present or planned – throughout the nation. The activities described, thus, are representative of stakeholders' efforts to date and, in the IAC's judgment, suitable for the current exercise.

[8] The IAC did not include the FCC's (and USAC's) considerable body of outreach work in the scope of this effort. The IAC certainly recognizes the FCC's plenary efforts to promote nationwide awareness of the ACP, and, as the administrator of the ACP under the IIJA, its role as the principal source of information all officials use to ensure their constituents know about all aspects of the ACP.

(PSAs) on Social Security Television in its more than 1,200 local social security offices. For more info, please visit SSA's website, here.

2. U.S. Dept. of Education's (ED) Office of Educational Technology ("OET")

ED's OET homepage has several sub-headings with drop-down menus, including one called "Initiatives", which has a "Broadband" click option. Navigating to that page, users find an "Affordable Connectivity Program" topic box which takes users to basic program information and eligibility requirements as well as key "resource information for school and district leaders" to aid their efforts to assist eligible school families to know about and enroll in the Program.[9] OET also provides four "strategies for school and district outreach to families" regarding the ACP. OET "encourages" schools and districts to "engage in outreach," including through use of the FCC's "Outreach Toolkit" (here provided) and the listed strategies (e.g., use the toolkit, create outreach partnerships with trusted community organizations, etc.).[10] Also, in October 2022, ED (through its Federal Student Aid Office) sent approximately 4 million emails to current year (2022-23) Pell Grant recipients to advise them of their ACP eligibility, and 3.5 million emails to prior year Pell Grant recipients to provide information about the ACP. For more information, please visit OET's website here.

3. U.S. Dept. of Health & Human Services (HHS) – Office of Family Assistance ("OFA")

At its web home page, HHS' Office of Family Assistance (OFA) has a link to the Affordable Connectivity Program on its list of "Resources." There, visitors can access a page entitled "Affordable Connectivity Program Outreach for State TANF [Temporary Assistance for Needy Families] Grantees," which presents a "Dear Colleague" letter (i) describing the ACP, (ii) encouraging TANF Grantees to contact TANF cash assistance recipients to inform them about the ACP benefit and tell the families directly how they can enroll, and (iii) providing the FCC/USAC and GetInternet.Gov weblinks to facilitate enrollment. OFA also provides links to the FCC's Outreach Toolkit and Fact Sheet. For more information, please visit HHS/OFA's website here.

4. U.S. Dept. of Housing and Urban Development (HUD)

HUD, on May 9, 2022, issued a Press Release describing the ACP, its eligibility requirements, etc., and providing links to the FCC/USAC for more ACP information and enrollment. In addition, HUD has informed HUD households that the ACP does not count as income for determining family rent or impact eligibility for HUD households; has provided ACP information to over 547 Tribes and Tribally Designated Housing Entities; and has provided ACP information to Project-Based Rental Assistance owners, who house more than 1 million families.[11] HUD also periodically provides updates on the ACP, including one on August 5, 2022 regarding the FCC's "Your Home, Your Internet" pilot program designed to raise ACP awareness among federal housing assistance recipients. Finally, HUD maintains a website, "ConnectHomeUSA," which has an "Affordable Connectivity Program Mini Guide." The four-

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[9] The resources include (i) a template letter that school and district administrators can use to tell families with children in free or reduced-price meal programs that they are ACP-eligible, and (ii) another template letter for families to provide consent for administrators to contact participating providers to inform them of those families' eligibility.

[10] In addition, the White House stated that, this past summer 2022, the Department of Education (i) emailed over 6 million ACP-eligible Pell grant recipients, and (ii) conducted a Back-To-School campaign with information about the ACP.

[11] Also, HUD, as of July 2022, emailed over 3,000 Public Housing Authorities with information about the ACP to share with their over 3 million families who receive Federal Public Housing Assistance and are eligible, and has been conducting follow-up engagement.

page guide contains full information on the ACP, including enrollment, eligibility, links and sites for more info, and outreach best practices. For more information, please visit HUD's website here.

5. U.S. Dept. of Veterans Affairs (VA)

The VA's "Connected Care" website provides information ("Veteran's Corner" page) on the ACP, the "FCC's new program [that] can help get veterans connected to care." The page provides basic information about the ACP and links to get more info and to enroll. The article also links visitors to the VA's "Bridging the Digital Divide" page, which describes the VA's efforts to help veterans get internet access and technology needed for healthcare, including through internet and phone discounts through the FCC's Lifeline program and ACP. Also, VA has a "MyHealtheVet" page that tells visitors about the FCC's ACP and Lifeline program to help veterans get internet service as well as tablets and computers to enable access to healthcare. The site discusses VA consulting services available to veterans to help them identify programs for which they are eligible (a "digital divide consult"), including the ACP.[12] For more information, please visit VA's website here.[13]

6. White House's "Get Internet" and "Internet for All" All of Government Effort

The White House has a comprehensive Spanish and English language webpage as part of its "Get Internet.gov" and "Internet for All" outreach initiatives, found, respectively, at https://www.whitehouse.gov/getinternet/, and Home | Internet for All. Eligibility ("qualifying") information, enrollment steps, links to the FCC/USAC, other details about the program and FAQs all are provided at the sites, along with a list of participating providers that offer plans fully covered by the $30 benefit and links to those providers' ACP enrollment-specific web pages.

In addition, as described in a "Fact Sheet," the White House has engaged in multiple ACP Outreach efforts and activities as part of the Administration's "'All of Government' Enrollment Drive." For example, "Partnering with State and Local Governments" to "spread the word" about the ACP is cited. Among such "successful partnerships" are Michigan, which texted about 1.3 million likely eligible Michiganders and gained 25,000 new ACP enrollees as a result; Albemarle County, Virginia, which incorporates a "P.S." about GetInternet.gov in every client communication by county social service workers; Massachusetts, which texted more than 1 million Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) beneficiaries about GetInternet.gov and saw their rate of enrollments double in the five days following the text; the City of Mesa, Arizona, which texted residents about GetInternet.gov and reported that constituents who hear about the ACP are extremely interested, showing a 10% clickthrough rate, as compared to a usual 1-5% rate for other Mesa governmental outreach; and New York City, which sent backpack flyers about the ACP home via 1,700 principals to reach about 1 million children who attend Community-Eligibility Provision Schools, and also pledged to advertise GetInternet.gov at bus stops in zip codes with a high number of households likely eligible for the ACP.[14]

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[12] In addition, the White House advised that the VA sent information to its 12 million VetResources email subscribers and 120 Community Veteran Engagement Boards, as Veterans Pension and Survivors Benefit recipients are eligible for the ACP. Further, in the summer of 2022, the Veterans Benefits Administration also was slated to directly mail all 380,000 Veterans and Survivors currently receiving pension benefits a notification letter and flyer.

[13] Also, *see* the U.S. Department of Agriculture's August 5, 2022 "Letter to the States: Eligibility for Affordable Connectivity Program through School Meals" here, in which USDA's Food and Nutrition Service advised all State Directors of Child Nutrition Programs of the ACP, its benefits and criteria, and encouraged "state directors to help spread awareness of ACP benefits and increase enrollment in their states."

[14] *See* "FACT Sheet: Vice President Harris Marks Important New Milestone in Administration's Efforts to Cut Costs for American Families", July 21, 2022, linked here.

Also, the White House cites working with advocates and digital navigators to reach and enroll eligible subscribers as a major outreach tool. In this regard, the White House describes partnering with civil rights groups to kick off a Week of Action in June 2022, in which the Leadership Conference and partner civil rights organizations reached out to communities to encourage households to sign up for the ACP; engaging United Way to share information about the ACP in communications; and working with Propel, a financial technology platform used by SNAP beneficiaries to promote ACP promotion this past summer. For more information, please visit the White House's website here.

B. State ACP Outreach

The IAC examined observable ACP outreach efforts of several states with significant ACP enrollment.[15] What follows are some samples and case studies of interest.

1. Online Outreach

Ohio (approximately 753,000 enrolled) includes information on the ACP through the Department of Aging, Ohio Legal Help, and through the Ohio Benefits self-service portal.

Pennsylvania (approximately 504,000 enrolled), uses its COMPASS program, which provides eligible residents access to health and human services benefits online to share information about the ACP and get people signed up. This is possible because the screening criteria for COMPASS are applicable for the ACP as well.

Indiana (approximately 282,000 enrolled) provides extensive information about ACP and related federal and state broadband connectivity programs at its official website, IN.gov, here.

Missouri's (approximately 240,000 enrolled) Department of Health and Senior Services includes information about the ACP on its website.

2. Libraries

The Massachusetts (approximately 235,000 enrolled) Libraries Board of Library Commissioners encourages community anchor institutions such as local libraries to support the rollout of the ACP by providing the ACP Toolkit on its website. The Board also provides office phone, cellular, and email information of a Library Information Systems Specialist to get more information.

Idaho's (approximately 27,000 enrolled) Commissioner of Libraries provides a great overview of the ACP on their website. It begins with the discount dollar amount, which is in bold, then provides a link to providers in Idaho that are participating, followed lastly by FAQs. In the side banner there is an explanation of what happened to the Emergency Broadband Benefit.

3. Broadband and Utilities

With a state enrollment of approximately 1.7 million, the California Office of Digital Innovation and CA Public Utilities Commission partnered to create an Emergency Broadband Benefit (ACP's predecessor program) page on their "California for All – Covid19.CA.Gov" website. They also directed

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[15] All state and ACP enrollment data discussed in this section are as reported by USAC as of October 24, 2022. *See* USAC's State ACP Enrollment Tracker here.

people to the page via Google AdWords targeting residents who searched for "low-cost internet." Live assistance was available within 24-48 hours of people leaving a comment or question on the page.

The North Carolina (approximately 591,000 enrolled) Department of Information Technology's Division of Broadband and Digital Equity shares the FCC outreach materials on their website and provides an email to assist with additional materials.

Louisiana (approximately 336,000 enrolled) and Arizona (approx. 322,000 enrolled) include information about the ACP, respectively, on the ConnectLA website, and the ConnectArizona website.

The Oregon (approximately 141,000 enrolled) Public Utility Commission includes information about the ACP on the Oregon Lifeline webpage.

4. Phone outreach

Michigan (approximately 510,000 enrolled), Massachusetts (approximately 235,000 enrolled) and Arizona (approximately 322,000 enrolled) partnered with the Biden Administration to text millions of eligible households.

Maryland (approximately 175,000 enrolled) provided an additional $15/month subsidy that consumers can receive in addition to the ACP benefit. In order to receive the Maryland benefit, households need to be enrolled in the ACP.   See www.opc.maryland.gov.

5. State ACP Outreach Case Studies: Illinois, West Virginia, Georgia, and New York

Prior to the introduction of the ACP, some states were already actively increasing broadband access and digital training. These programs, which are already addressing community connectivity needs, provide a practically seamless path to inform local agencies that, in turn, provide ACP education and outreach to eligible participants.

a. State of Illinois

The Illinois (approximately 443,000 enrolled) Connected Communities program encourages participating communities to take advantage of other State of Illinois broadband programs and funding opportunities. Key initiatives include Connect Illinois and The Broadband Regional Engagement for Adoption + Digital Equity (READY) program. The READY program provides grant funding to galvanize collaboration among key broadband stakeholders across all 10 of Illinois' economic development regions. Each regional Broadband READY team identifies current digital inequities as well as next steps in creating a digital inclusion ecosystem among community and economic development organizations, higher education, libraries, and other regional stakeholders. The Connect Illinois Computer Equity Network partners with a national nonprofit group, PCs for People, to assist in the state's digital equity initiatives by receiving, refurbishing, and redistributing computers to those in need.

b. State of West Virginia

West Virginia's (approximately 276,000 enrolled) Department of Health and Human Resources reminds residents who participate in certain government assistance programs that qualify for ACP

State Broadband Offices

NTIA – The National Telecommunications and Information Administration has a valuable website/map that connects local leaders to their State Broadband offices here.

Also, check out Pew Charitable Trusts' Info on States with Dedicated Broadband Offices here.

These offices typically administer, or co-administer, federal broadband programs (like the ACP), and provide dedicated personnel, resources, logistical know-how and other leverageable assets for ACP outreach, all part of the State's commitment to its broadband deployment goals.

(Lifeline, SNAP, Medicaid, WIC, Supplemental Security Income, Federal Public Housing Assistance, Veterans Pension and Survivors Benefit, Free and Reduced-Price School Lunch Program or School Breakfast Program, including U.S. Department of Agriculture Community Eligibility Provision schools or if they received a Federal Pell Grant in the current award year) that they qualify for the ACP, which provides eligible households with a discount of up to $30 per month towards internet service plans.

Interested persons are advised that they should visit https://www.affordableconnectivity.gov/how-to-apply/ to submit an application online or print out a mail-in application.

c. State of Georgia

Georgia has roughly 511,000 ACP-enrolled households. The Georgia Family Connection Partnership (GaFCP, here) brings together more than 3,000 local- and state-level partners in all 159 counties in Georgia working toward measurably better outcomes for Georgia's children, families, and communities. Georgia Family Connection is the only statewide network of its kind in the country. At the local level, it connects GaFCP's partners to the resources they need, helps coordinate and manage efforts, and empowers communities to craft local solutions based on local decisions. One of the ways that's accomplished is by linking communities to the latest research and information about best practices for collaborating and improving the well-being of children and families, about state- and local-level policies that affect Georgia's communities and, of course, federal programs and initiatives like the ACP.[16]

This gives GaFCP a unique vantage point—not only to see the big picture, but also to operate effectively at a local level. At the state level, it supports the Georgia Family Connection statewide network by providing expertise in planning and governance, and by administering the state-appropriated funds for the local collaboratives. It also sets standards of excellence and helps Collaboratives evaluate their progress in addressing the challenges in their communities by bringing together representatives and leaders from state agencies; civic groups, local businesses, and faith communities; elected officials; and concerned citizens.

d. State of New York

New York, with over 1 million ACP enrollees, has essentially adopted an "all of government" approach to ACP awareness, through which it can now boast of one of the nation's highest levels of ACP enrollment. New York's Governor, Kathy Hochul, announced on October 5, 2022 that:

- **NY's Office of Temporary and Disability Assistance** directs social services agencies to share ACP outreach materials with clients and contracted service providers, and has published outreach on its social media sites.
- **NY's Office of Children and Family Services includes** the ACP in newsletters and promotes the ACP through social media and local departments of social services, childcare providers and licensors, foster care and volunteer agencies, community multi-services offices, the statewide partnership for households of juvenile-justice-involved youth, runaway and homeless youth shelter operators and domestic violence shelter operators.
- **NY's Department of Motor Vehicles** runs a social media advertising campaign, broadcasts a public service video on monitors in state-operated DMV offices in New York City, Long Island, and Albany, Westchester, Rockland, and Onondaga counties, and has mailed approximately five million informational inserts throughout the year when customers receive their drivers licenses.

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[16] *See* "Affordable Connectivity Program Helps Households Connect", June 15, 2022, here.

- **NY's Office of the Aging has partnered with NY's Department of Public Services** to provide materials to 59 county Offices for the Aging's meetings, picnics, health fairs, senior centers, social adult day sites, and naturally occurring retirement communities. DPS and the Office of the Aging have also distributed a training recording to more than 1,200 community-based organizations and have created and released a public service announcement, e-newsletter and social media.
- **NY's Digital Equity Working Group (DEWG),** a working group led by New York State Education Department's State Library, promotes projects to increase digital inclusion at the state and local level, including information about the ACP.
- **NY's Empire State Development** group shares information on the ACP through the Regional Economic Development Councils, the New York State Association of Counties, the Association of Towns, local Digital Equity Coalitions, and ConnectALL's (New York's large-scale digital infrastructure initiative's) roster of internet service providers.

C. County ACP Outreach

The IAC also examined outreach efforts within the states at the county level to ensure ACP awareness by the program's intended recipients, and that these potential beneficiaries know how to sign up or to get answers to their questions about the Program. Relying significantly, but not exclusively, on information at the [National Association of Counties website](#), the IAC identified several U.S. counties acting assertively to ensure ACP awareness and promote eligible consumer enrollment. Here are some examples.[17]

1. Los Angeles County, California

Los Angeles County (approximately 425,000 enrolled) had early success with the Emergency Broadband Benefit (EBB) Program. Spending $330,000 or $7.65 per household on advertising, Los Angeles County saw a 44% increase month over month in sign up. They developed 30-second TV ads, radio commercials, and millions of paid media impressions. LA County focused on high-need zip codes to focus on advertising and ensured that advertising was conducted in-language and in-culture in priority communities.

The county measured success not only in the increase in signups but also in calls for assistance. They saw a 350% increase in calls month over month -- increasing calls from 1,400 calls per month to over 5,000 in one month, sending 21,145 people to the USAC subsidy application.

In addition to mass advertising, some county departments emailed or texted eligible recipients, and 457,000 printed fliers were handed out to eligible participants including at food distribution sites and holiday giveaways.

LA County cites 38 outlets that covered county-sponsored press events, highlighting the critical resource of ethnic media outlets.

2. King County, Washington

King County, Washington (approximately 49,000 enrolled) created a partner toolkit for service providers to increase enrollment. The toolkit includes a fact sheet, flyers, PSA language, overview videos, newsletter blurbs, a press release and social media posts.

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[17] All county ACP enrollment data discussed in this section are as reported by USAC as of August 2022. *See* USAC's County and Zip Code ACP Enrollment Tracker [here](#).

3. Montgomery County, Maryland

At its website, [Affordable Connectivity Program (montgomerycountymd.gov)](#), Montgomery County (approximately 13,000 enrolled) provides visitors a full suite of ACP information, including eligibility requirements, application steps and necessary paperwork to demonstrate eligibility based on type of criterion used (e.g., SNAP, Medicaid, etc.), and important links to more information (FCC and USAC's ACP web pages, and the FCC ACP Toolkit). The county also provides a full and updated list of participating providers, including information on type of broadband service offering, whether the provider offers devices and, if so, what type, and also broadband "capacity" information. Language is simple and easily understandable ("apply" instead of "enroll", for example). And the website also describes the Lifeline program and its interaction with ACP for consumer comparison purposes.

Finally, the site refers to Montgomery County's Office of Broadband Programs (OBP), which "is available to provide speakers and is working with ConnectedDMV to provide 'Train the Trainer' trainings for staff, volunteers, and case workers that want to better understand how to enroll residents in the ACP." Send an email to [OBP@montgomerycountymd.gov](#).

4. Albemarle County, Virginia

Albemarle County's (approximately 1,600 enrolled) website ([here](#)) touts its "Affordable Connectivity Program Bridge", a program that complements the federal ACP with an additional [up to] $20 monthly benefit for eligible residents. Site visitors are invited to enroll in both the federal program as well as the state add-on, with links to both. FAQs and a list of providers that have applied for enrollment to the county's program are also one click away. This "Bridge" benefit outreach is in addition to a full range of web-based outreach for the ACP, which is managed and updated by the county's Broadband Accessibility and Affordability Office. That office (the BAAO), among other things, provides quarterly reports on the County's Broadband affordability and accessibility efforts, including updates on federal and state ACP initiatives. And, as mentioned above in the federal section, Albemarle County incorporates a "P.S." about the White House's [Get Internet | The White House](#) page in every client communication by county social service workers.[18]

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[18] Also, NACo provides the following suggestions to its county members for ACP outreach: 1. Launch informational website; 2. Meet with ISPs; 3. Host a webinar; 4. Integrate resources into existing assistance programs; 5. Hold a press conference; 6. Issue a press release; 7. Partner with schools and libraries to spread awareness; 8. Leverage trusted organizations; and 9. Highlight success and progress. *See* [Outreach Toolkit for Counties: the FCC's Affordable Connectivity Program (naco.org)](#). Also, based on what other counties are doing, additional best practice ideas for ACP outreach include: 1. Advertising should be language and culture-friendly -- counties should consider using FCC materials as a template and cater information to priority eligible populations; 2. Work with community-based organizations to meet the specific needs of the local population; and 3. Make fact sheets and flyers available at county and municipal programs that provide safety-net services, such as food banks, homeless shelters, medical services.

D. Municipal Outreach

The IAC also examined ACP outreach efforts by cities and municipalities around the nation. As the IAC studied these activities and opportunities around the country, it quickly became aware of the diverse environments, for outreach purposes, that exist among the Nation's municipalities and their governance structures.

Cities (large and small), counties, townships, villages, unincorporated communities, census-designated places, and tribal nations all offer unique geographic and social obstacles to providing "Internet for All." Based on the research conducted by the IAC, using FCC data, the IAC researched the municipalities that have the highest levels of enrollment in the Affordable Connectivity Program as a percentage. After identifying these municipalities, the IAC broke them down into subsets by size into large, medium, and small.

The IAC then took a deeper dive into what outreach efforts and strategies were driving the enrollment numbers in these high-performing cities. It is the aim of this section to provide a brief overview of a few municipalities, including examples of ACP outreach and/or enrollment success, in hopes of providing information for municipal (and other government) officials to enhance ACP awareness and encourage ACP participation in their communities.[19]

1. Large Cities

a. Washington D.C.

This past May 2022, D.C.'s [Population: 701,974; Total Enrollment: approx. 43,000][20] Mayor Muriel Bowser launched D.C.'s "Infrastructure Week" in which, among other things, the city established an initiative to give ISPs free access to District-owned building rooftops *if* they commit to providing high-speed connections (200 Mbps up/200 Mbps down or higher) at reduced or no cost to households eligible for the ACP. The Mayor's office press release is available here.

b. Los Angeles, California

Los Angeles County [Population: 10.04M; Total Enrollment: approx. 549,000][21] established a collaborative partnership with community organization "Internet for All Now" to promote ACP awareness and enrollment. Potential subscribers can learn about the ACP at both LA websites and at

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[19] Please note that the ACP tracks county-level data, so those data points have been included for comparison. Some municipal examples have been listed but are not a complete list of the entities within the counties.

[20] *See* USAC's State ACP Enrollment Tracker here.

[21] *See* Ca.Gov "California All, Broadband for All" ACP Enrollment Tracker here. Data are as of September 2022.

Internetforallnow.org. Information is available in both English and Spanish. See https://dhs.lacounty.gov/my-health-la/affordable-connectivity-program-collaboration/.

Also, consumers can learn about the ACP through "Get Connected Los Angeles," where LA's Information Technology Agency (ITA) provides ACP information to City residents. This information is based on data gathered from various organizations dedicated to helping people get online at https://getconnectedlosangeles.lacity.org/.

More sources of ACP information for Los Angelenos can be found through:

Next Century Cities

Next Century Cities, an organization of roughly 220 city members spanning over 40 states, focuses on issues affecting broadband connectivity and municipal governments. Like NACo's service to its County constituents, Next Century Cities provides a full suite of information, links and other "ready to use" ACP outreach materials for its members. Check it out here.

National League of Cities

NLC provides substantial ACP information at its website, found here.

- Neighborhood Council: Northridge East Neighborhood Council ACP outreach and promotion. https://nenc-la.org/2022/04/affordable-connectivity-program/
- LA County Office of Education: https://achieve.lausd.net/ebb
- California Public Utilities Commission, Lifeline Program -- https://www.californialifeline.com/en/acp

c. Houston, TX (Harris County, Texas)

In Harris County's [County Population: 4.681M; Total Enrollment: approx. 137,000][22] Law Library, located in the county's big city, Houston, provides information at its website about the program at https://www.harriscountylawlibrary.org/ex-libris-juris/2022/4/28/acp.

d. Brooklyn, NY (Kings County, New York)

"Access NYC" is a New York City online information hub that promotes information and awareness of ACP throughout Brooklyn's Kings County [Population: 2.57M; Total Enrollment: approx. 148,000].[23] For info, visit https://access.nyc.gov/programs/affordable-connectivity-program/.

e. Miami, FL (Miami Dade County, Florida)

Miami's Dade County [Population: 2.706M; Total Enrollment: approx. 137,000][24] has partnered with Coordinated Care for Children, Inc., a local non-profit with profound ties to targeted communities, to promote enrollment in the affordable connectivity program. For info, visit https://4cflorida.org/federal-affordable-connectivity-program/.

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[22] *See* USAC's Zip Code and County ACP Enrollment Spreadsheet, available here. Data are through the end of August 2022.

[23] *See* USAC's Zip Code and County ACP Enrollment Spreadsheet, available here. Data are through the end of August 2022.

[24] *See* USAC's Zip Code and County ACP Enrollment Spreadsheet, available here. Data are through the end of August 2022.

f. Atlanta, GA (Fulton County, Georgia)

Fulton County, GA [Population: 1.05M; Total Enrollment: approx. 45,000][25] in partnership with internet providers along with nonprofit and faith organizations, launched the "FulCo Digital Ambassador Program," aimed at shrinking the digital divide by enrolling at least 20,000 qualifying Fulton County households in free and low-cost internet services through the FCC's Affordable Connectivity Program. Participating partners will participate in training to help residents complete the application to qualify for the ACP. More info is located here.

g. Cleveland, OH (Cuyahoga County, Ohio)

InnovateOHIO, under the auspices of "Connected Nation Ohio", works to bring the benefits of universal broadband to Cleveland's Cuyahoga County [Population: 1.24M; Total Enrollment: approx. 85,000][26] and throughout the state. CN Ohio works together with the State of Ohio to address broadband issues in communities across the state and invites them to join in changing communities and lives, and provides comprehensive eligibility and enrollment information about ACP at its website. For info, visit Connected Nation Ohio.

2. Medium and Small Cities/Municipalities

Midsize and small cities and municipalities have used a variety of activities and options to promote ACP awareness and enrollment. Here is a compilation of Outreach practices observed by the IAC.

- **Use of Municipal Website** to host a webpage with information on the ACP. In researching medium-sized localities, the large majority of cities provide information about the Affordable Connectivity Program and how to access the benefits through their city-owned and city-hosted websites.

- **Use of City-sponsored affordable housing programs** – The Stewards of Affordable Housing for the Future (SAHF) has published a highly informative article entitled "Bridging the Digital Divide in Affordable Housing Communities – A practitioner's resource for Multifamily operators" (here) which embraces the challenges of bringing internet access to those living in affordable housing communities. Most medium-sized cities are entitlement cities in receipt of affordable housing funds. As such, many of these cities are also affordable housing landlords and operators. This publication has a wealth of information to ensure that city housing departments are knowledgeable about the digital divide when engaging with participants in affordable housing programs. Housing staff members are in a good position to take the extra step of providing information on the ACP to their program participants via physical flyers and emails, as well as verbal communication when educating them on the various federal programs available to them.

- **Providing public access in public spaces** – In addition to providing information on the EBB Program and the ACP, the City of San Jose, CA has launched public Wi-Fi areas accessible to their community at local parks and libraries, https://www.sanjoseca.gov/your-government/departments-offices/parks-recreation-neighborhood-services/digital-literacy.

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[25] *See* USAC's Zip Code and County ACP Enrollment Spreadsheet, available here. Data are through the end of August 2022.

[26] *See* USAC's Zip Code and County ACP Enrollment Spreadsheet, available here. Data are through the end of August 2022.

a. Small City Case Studies: Mobile County, Alabama and San Juan Municipio, P.R.

Cities and Towns in Mobile County, Alabama [Population: 413,977; Total Enrollment: approx. 17,000][27] Chickasaw (6457), Citronelle (3946), Mobile (187,041) Prichard (19,332), Saraland (16,171), Satsuma (6749), Semmes (4941).

At its website, the Alabama Digital Expansion Division of the Alabama Department of Economic and Community Affairs (ADECA), https://adeca.alabama.gov/affordable-connectivity-program/, has used three principal methods to ensure ACP awareness and encourage ACP enrollment by eligible consumers:

- Advising consumers to call their internet service providers to ask about the ACP,
- Advising consumers to enroll in the ACP online (at the FCC's website), and
- Advising consumers to enroll in the ACP via the US Mail or call (the FCC/USAC) by phone using the toll-free number, 877-384-2575.

San Juan Municipio, Puerto Rico [Population: 326,953; Total Enrollment: approx. 37,154][28]

The FCC's data shows that there are approximately 47 broadband providers offering subsidized fixed and mobile broadband access in Puerto Rico.[29]

In addition their own efforts to promote the ACP, San Juan also appears to be benefiting from an above-average number of internet service providers in their area, https://newsismybusiness.com/66k-puerto-rico-households-have-signed-up-for-fcc-broadband-subsidy-program/.

3. Final Thoughts on Cities

In addition to the programming and outreach effort specifics detailed above, the IAC wishes to highlight three enrollment strategies that should be implemented through municipal outreach efforts:

- ACP promotion by and through broadband internet service providers where enrollment happens;
- Public-private partnerships to ensure synergies to promote enrollment; and
- Grassroots community engagement to ensure that familiar community uplift resources are engaged, not sidelined, in the enrollment effort.

The IAC also would like to emphasize the importance of encouraging elected and local officials to foster productive working relationships with broadband service providers in their respective communities.

E. Outreach on Tribal Lands

The IAC examined the ACP outreach efforts associated with Tribal lands.

This effort begins with the FCC's efforts, given the special, "government-to-government" relationship between the U.S. Government and Tribal communities, observed over many decades of

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[27] *See* USAC's Zip Code and County ACP Enrollment Spreadsheet, available here. Data are through the end of August 2022.

[28] *See* USAC's Zip Code and County ACP Enrollment Spreadsheet, available here. Data are through the end of August 2022.

[29] *See* https://newsismybusiness.com/66k-puerto-rico-households-have-signed-up-for-fcc-broadband-subsidy-program/. *See* USAC's "Companies Near Me" Tool, https://newsismybusiness.com/66k-puerto-rico-households-have-signed-up-for-fcc-broadband-subsidy-program/.

Federal-Tribal communications policy.[30] The FCC's Consumer Toolkit includes downloadable ACP social media images, fact sheets, and other outreach content and materials that can be customized for consumer awareness campaigns. Selected materials include:

- Tribal Benefit Radio Public Service Announcement - Prepared Audio: MP3 Clip (30 seconds), and a suggested script for you to tailor – Word Document
- Social Media Posts - Suggested language and graphics – Word Document and more social media graphics – Webpage.
- Tribal Partners can request a speaker to be present at their events by sending an email to ACPspeakers@fcc.gov.

USAC, which administers the program, also provides the following outreach materials on the Community Resources webpage for partners to print and hand out ACP Outreach Toolkit, Consumer Toolkit, ACP Brochure (digital), ACP Brochure (print), ACP Tribal Flyer, Social Media Image Files. Also, USAC provides a sample letter for Tribal Outreach (See Appendix).

Developments to date under the ACP (as well as its predecessor, the Emergency Broadband Benefit Program) have revealed the outreach "lay of the land," and several practices that are designed for success (i.e., awareness by eligible consumers and facilitation of enrollment in the program).

- **Use of the same definition of Tribal lands as the Lifeline program** – Because the ACP uses the same definition of Tribal lands as the Lifeline program (which enables an internet provider to help determine whether an address is on Tribal lands), outreach to consumers, providers and other stakeholders can refer to this nationwide map showing Tribal lands eligible for enhanced ACP and Lifeline support.

- **Providing information about participation and tips for applying** – Tribal consumers can visit the enhanced Tribal benefit webpage (here) for information about participation, Tribal lands, and tips for applying.

- **Allowing Descriptive Addresses** – USAC uses the United States Postal Service's (USPS's) Address Matching System (AMS) to automatically verify if an address is on Tribal lands for the Enhanced Tribal Benefit. USAC also provides consumers the option to enter descriptive street addresses when filling out the application.

- **Using a** guide **developed for the Lifeline program** – Even though the ACP is separate from the Lifeline program, applicants are encouraged to use a guide developed for the Lifeline program to address issues with an ACP application.

- **Establish data-sharing agreements with FCC/Universal Service Administrative Company (USAC) -** These agreements would enable USAC to use beneficiary data to verify a consumer's eligibility for the ACP, streamlining the application process for households. All agencies with information that could simplify the ACP approval process should consider entering into a computer matching agreement with USAC. Tribal partners can learn more information about the ACP and obtain contact information at https://www.fcc.gov/acp. For more information about establishing a data-sharing agreement, please visit: https://www.usac.org/about/affordable-connectivity-program/acp-processes/check-consumer-eligibility/database-connections/ or email ACPGovPartners@usac.org.

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[30] *See e.g.,* Statement of Policy on Establishing a Government-to-Government Relationship with Indian Tribes, 16 FCC Rcd 4078 (2000) (Tribal Policy Statement).

- **Engage in Targeted ACP Outreach to Tribal TANF Grantees** – Targeted outreach should be directed to families living on qualifying Tribal lands that are receiving Tribal Temporary Assistance for Needy Families (TANF) assistance. See (https://www.acf.hhs.gov/ofa/policy-guidance/acp-outreach-tribal-tanf-grantees). These families qualify to receive the ACP benefit on that basis and may enroll through an approved ACP provider or by visiting affordableconnectivity.gov.

1. **Parallel Program Study: The Tribal Broadband Connectivity Program (TBCP)**

The Tribal Broadband Connectivity Program (TBCP), administered by the U.S. Department of Commerce's National Telecommunications and Information Administration (NTIA) and created by the Consolidated Appropriations Act, 2021, will provide nearly $3 billion in dedicated funding to expand broadband on Tribal lands. [31] The program will deploy broadband infrastructure, establish affordable broadband programs, and support digital inclusion across Indian Country to lessen the digital divide. The TBCP focuses on connecting Tribal communities that have the greatest needs when it comes to basic broadband services. Some of the TBCP's key features are as follows.

a. Affordability

Half of households in rural Tribal lands lack broadband service at home.[32] While part of this is due to gaps in broadband infrastructure that disproportionately impact Tribal areas, this also is because the United States has some of the highest broadband prices among OECD countries. The TBCP will fund programs designed to make broadband affordable for Tribal families, including those that provide free or reduced-cost service. There is no matching funds requirement for tribes to apply for the TBCP.

b. Digital Inclusion

Indigenous communities are among the most unserved and underserved populations for broadband deployment and adoption in the country, which has been devastatingly evident throughout the disproportionate impact of the COVID-19 pandemic. Digital inclusion encompasses not only access to the Internet but also the availability of hardware, software, digital content and services, and maybe most importantly, training for the digital literacy skills required for effective use of information and communication technologies. The TBCP will be critical to bridging the digital divide and building the capacity of Tribal communities to take full advantage of the economic and educational opportunities of the 21st century.

c. Outreach for TBCP

Outreach for the TBCP provides additional, and highly useful, material for designing effective ACP outreach for Tribal lands residents. Prior to launching the program, NTIA:

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[31] *See* https://www.commerce.gov/news/fact-sheets/2021/06/fact-sheet-biden-administration-offers-nearly-1-billion-grants-help. *See also* Grants | National Telecommunications and Information Administration (doc.gov) (NTIA providing additional $2 billion to initial $980 million in 2021).

[32] *See, generally, Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, Fourteenth Broadband Deployment Report, GN Docket No. 20-269, FCC 21-18, at 30-35, paras. 43-47 (2021), found here.

- o conducted 13 hours of Nation-to-Nation tribal consultation with Tribal, Alaska Native Villages, and Hawaiian Home Lands to hear the issues surrounding the digital divide and the impacts of COVID to tribal governments, health facilities, educational institutions, and businesses;
- o performed extensive outreach including more than 50 regional tribal presentations;
- o conducted 10 webinars for prospective applicants; and
- o ensured engagement at the individual tribal and consortia level.

Although the TBCP and the ACP are different programs with, at least nominally, different core broadband objectives, both programs have a similar outreach, awareness and engagement thesis. Information about the TBCP (and the Bureau of Indian Affairs newly announced National Tribal Broadband Grant – see info here) was also disseminated through targeted Tribal community online newsletters, which increased awareness of the funding opportunity.

Importantly, TBCP's outreach set expectations for how Tribal communities can be engaged to ensure a major broadband program's effectiveness in meeting the needs of Tribal lands' residents. Early and sustained engagement of and consultation with Native American Tribes, Alaskan Villages and Hawaiian Homelands to ensure ACP awareness by their communities will substantially aid ACP outreach effectiveness and enrollment of eligible consumers in those areas.

IV.   RECOMMENDATIONS

A.   ACP Outreach Best Practices and Recommendations

The highly commendable ACP outreach efforts and campaigns described above offer good material for other stakeholders, at all levels of government, to use for fashioning their own ACP outreach programs. The IAC offers the following general and specific observations about "best practices" in regard to ACP outreach efforts.

1.   General observations

First, an "all of government" outreach approach, e.g., the execution strategy of the White House and at the state level (for example, the State of New York described above), is a very effective awareness strategy for a major initiative like the ACP. This is especially so in the early stages of an awareness campaign, because (i) it aligns priority with significance, and does so visibly both to government staff who will carry out the program and the communities for whom the program is intended, and (ii) it enhances outreach effectiveness through distribution of the outreach load to all who interact with or "face" the communities for whom the program is designed, as opposed to selected siloes that may find the burden difficult to manage effectively. This latter value is significant in the initial stages of program outreach, where the biggest outreach push is typically made (i.e., a "launch"), but diminishes over time as communities become familiar with the program, enroll and realize the ACP's value, and the program becomes institutionalized as a social asset of the communities targeted.

Second, the IAC believes stakeholders should study, adopt, and leverage the work of other governmental stakeholders, whatever their level or proximity, to advance the cause of ACP awareness without "pride of authorship." Building new mousetraps is resource-draining and should be avoided unless truly unique circumstances warrant it. It seems better to look at what others are doing and tailor approaches to one's own environment, as needed, than to start an outreach program from scratch. Given that the core of the outreach is the program itself, and that the metrics of the program are the same everywhere (with the exception of the benefit differences between Tribal and non-Tribal land participants), emphasis should be placed on time-to-market and accuracy of information, with lesser emphasis on creating a "new" science (or art) of outreach.

Third, the IAC believes stakeholders should exercise initiative and creativity in adapting crowd-sourced outreach approaches to the unique aspects and features within their jurisdictions that, in officials'

best judgment, affect the community's ability to receive and absorb the information. The goal is to enhance ACP awareness and facilitate enrollment of eligible persons. State, county, local, and Tribal officials and social services staff know their communities, know idioms and have built trust. Those are critical tools to shape any awareness campaign, and it would be expected that expertise would be brought to bear in crafting and executing any ACP awareness campaign.

Fourth, this is a digital world, and even in a situation where the targets of an outreach program – by definition – are or may be digitally disadvantaged, the electronic tools that are designed for and undergird government transparency and trust should still be leveraged heavily to deliver, enhance and amplify the ACP awareness message. Governmental websites are now the go-to sources by persons throughout the country for information about their government – about opportunities, about programs, services and benefits, and about virtually anything they think their governments are or should be doing to serve them. Well-designed and supported websites move messages and ensure message saturation by the targeted groups or those who are in relationship with them. And, of course, people know people, and are typically within a degree or two at most of separation from someone with access to digital information. Putting the key information in the hands of the digitally enabled is very, very useful in getting the info to their friends, associates or loved ones who aren't. ACP awareness absolutely is enhanced by governmental web tools and the transparency they provide and trust they engender.

Finally, *fifth*, the IAC strongly believes, as further discussed in the next section, that stakeholders should measure the effectiveness of their awareness campaigns to ensure accuracy and freshness of the information being cast into the communities, penetration with the targeted populations, and efficient enrollment by eligible persons. Stakeholders should add assurance elements to their awareness programs, as practicable, and should take steps to gather data – where is the outreach being performed, what is the potential subscribership target, who is actually subscribing in a way that is traceable to the campaign, feedback from the community through web questions at the state or at the FCC/USAC levels, etc. – to aid in monitoring awareness campaign effectiveness.

2. Specific "best" practices observations

Consistent with, and in support of these conclusions, the IAC presents general best practices that it believes are, or can be, associated with enhancement of ACP outreach efforts to (i) better ensure state, local and Tribal officials are aware of the ACP; (ii) encourage enrollment by eligible households; (iii) assist state, local and Tribal officials in understanding their roles with respect to the ACP. These practices go hand in hand with optimizing applications by eligible consumers to receive the benefit, the IAC's second charge and are discussed in that regard as well.

a. Websites

For some time now, state, county, local, and Tribal governments have utilized web-based resources to aid in almost all aspects of their governance missions.[33] Across all spectra of daily life,

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[33] The value of good e-government, at all levels of government, is well-described as follows: "E-government applications can guarantee that public policies are implemented with a high degree of transparency and accountability, provide quality public services and improve the government's performance. * * * E-government can also be a strategic tool to enhance maximum participation of citizens in the political and social development of a country through effective participation, consultation, and empowerment process. * * * The important factors for government agencies to undertake to create an open government include the publishing of government information online, improve the quality of government information and create, maintain and institutionalize a culture of open government. * * * Based on that, e-government success is intertwined with open government concepts, where the adoption of such technology and service is influenced greatly by citizens' perceptions." *See* I. Mensah, C. Luo and E. Abu-Shanab, "Citizen Use of E-Government Services Websites: A Proposed E-Government Adoption Recommendation Model (EGARM)", Int'l. Jrnl. of Electronic Government Research (April 2021).

people – from K-12 through super seniors – have become accustomed to visiting, navigating and obtaining info official websites maintained by the governmental entities that serve them to get information important to their daily lives. Government websites[34] are simple, well-established ways to reach wide audiences that currently have broadband connectivity, or at least limited connectivity, in their homes, workplaces or school environments and who may be in close relationship with persons with no connectivity who can benefit from the ACP.

Here are some tips for posting information on the web.

- Feature the ACP on the main page (home page) as a "topic", and not in the side panels or footers.
- Go to the horse's mouth, i.e., let the ACP experts speak to your audience directly through blog postings or other similar features.
- Keep it fresh – stay abreast of key ACP developments and update your site as developments warrant.
- "Just the facts, ma'am," i.e., provide information, not commentary, and ensure users have access to do a deeper information dive, to enroll, and to get their questions answered.
- Click through must be efficient, swift and effective to ensure users stay engaged long enough to get the info they need.[35]

b. Leveraging others' good works

Public awareness – the goal of any outreach program – of the ACP does not require entirely new institutional assets to be achieved.[36] To the contrary, many already-established services and programs at all levels of government have firm contacts with individuals who likely qualify for the ACP. These channels and relationships should be fully leveraged to promote ACP awareness among the targeted

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[34] *See* Government Online | Pew Research Center, "Government Online", April 2010 ("As government agencies at all levels bring their services online, Americans are turning in large numbers to government websites to access information and services. Fully 82% of internet users (representing 61% of all American adults) looked for information or completed a transaction on a government website in the twelve months preceding this survey. Some of the specific government website activities in which Americans take part include … 48% of internet users have *looked for information about a public policy or issue* online with their local, state or federal government; 46% have *looked up what services a government agency provides*; 41% have *downloaded government forms*; and 23% have gotten information about or applied for *government benefits*"). The IAC expects that more recent data would certainly bolster these results.

[35] *See* The Importance of Having a Functional Government Website | Granicus (last visited 9/28/22) ("For the average user, the amount of time spent on any new website is minimal – in fact, one estimate clocks in the average website visit to 15 seconds or less. This is why it's important to make valuable information as easy to find as possible") (emphasis in original).

[36] "Awareness-raising is a process that seeks to inform and educate people about a topic or issue with the intention of influencing their attitudes, behaviors and beliefs towards the achievement of a defined purpose or goal. … There are multiple awareness-raising strategies, methods and tools that can be used to convey and spread messages . . . . Depending on the topic, awareness-raising efforts may include the following activities: issuing press releases, briefings and commentaries; … working with the media; holding public meetings and events; convening conferences and workshops; and creating and contributing to educational materials. Information may be disseminated through a range of different means or tools such as radio, television, video, film, the internet, social media, mobile phones, newspapers, newsletters, leaflets, poster campaigns and the arts." TAP Network, SDG Accountability Handbook, "Raising Awareness Through Public Outreach Campaigns," located here (last visited 9/27/22).

populations while ensuring that state, county, local, and Tribal officials understand their roles and opportunities to enhance ACP awareness and enrollment.

In this regard, stakeholders should:

- Get the word about the ACP to potentially eligible constituents through established contact channels. Letters and emails to front-line personnel, as well as officials' direct and dotted-line reports (e.g., "Dear [Social Program] Directors . . .") are excellent ways to empower staff to ensure direct, efficient contact with the target populations. And "drive with text", i.e., optimize leveraging of established contact paths by providing precise language for cut-and-paste use with limited need for message re-crafting.
- "Cascade", i.e., leverage and empower institutional assets to connect to target communities directly, asset-to-consumer. Start with organizational matrices ("org charts'), identify the right boxes, and empower consumer-facing assets to get the word out on ACP.
- "Hitch a ride," that is, get links placed on the outgoing communications from state/county/local/Tribal service workers who liaise directly with constituents and eligibility communities in their ordinary course of business. And, when officials are out in the community for other official purposes (e.g., school openings, press conferences and avails, or other public activities), add the ACP to their talking points and materials for distribution.
- Adopt a "buses and backpacks" approach, i.e., like getting info into kids' backpacks to take home to parents or having posters up inside bus stop ad spaces to target the K-12 eligibility community, leverage un-conventional or intangible assets (e.g., public-placed forums or structures, teacher-to-parent engagement portals, etc.) and other conditions conducive to spreading the word about the ACP.

c. **Adding your own initiatives**

If you have some additional resources, think about doing some of the following.

- Brand and launch an ACP awareness campaign – a targeted, well-designed, and well-resourced initiative to address specific areas where outreach either has been lacking or simply to amplify the ACP message with an "all hands on deck" feel to it can be very effective because of the concentration of the message and the energy of the outreach.
- Broadcast PSAs on dedicated TV screens in official offices (or other traditional mass communication means, e.g., PEG channels and radio likely to be watched and/or listened to by target communities of eligibility).
- Employ a digital navigator who can help people sign up and through the entire process. This should be a trusted member of the community who speaks the language and understands the culture.
- Consider using local or nationally syndicated radio programs popular with targeted communities to help get the ACP message out. For example, Vice President Harris used the Russ Parr Morning Show's highly rated platform to tout the benefits of the ACP during her July 2022 visit to Charlotte, North Carolina. The Show reportedly is heard weekdays by more than 3.2 million listeners in dozens of U.S. cities, and nationally syndicated by Reach Media. Parr also hosts a weekend show, On Air with Russ Parr, which can be heard on more than 40 radio stations.[37]

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[37] *See* russparr2, Author at Black America Web (last visited 9/27/22).

> d. **Assurance Tips**

- "Trust but verify," i.e., make sure outreach channels are effective at getting the word out and, hopefully, driving enrollment of eligible consumers. Monitor the outreach to ensure the messaging is accurate and up to date. Consumers routinely give up on otherwise beneficial programs because of confusion and frustration caused by inaccurate information.
- "Avoid Pride of Authorship," i.e., get the data and information from other levels of the institutional matrix and use what worked in their experiences. This enhances message consistency, promotes a virtuous feedback chain within institutions, and provides confidence to potential beneficiaries about the program.

3. Additional Considerations

The greatest challenge in increasing enrollment and participation in the ACP is that the communities that this program aims to serve are the hardest to reach, least connected, and least digitally skilled. Participation requires them to use a process involving internet and technology. Also, certain individuals have additional barriers that infuse a level of complexity to the process such as residents without social security numbers or individuals with multiple names in a given social services system. Moreover, it is important to account for potential skepticism and lack of trust in government programs among persons for whom the ACP is designed. Indeed, due to language barriers, technology barriers, and other factors, individuals have been victims, or fear being the victim of scams by bad actors who offer free programs or make offers that may seem "too good to be true." All of these and other similar concerns should be considered as ACP outreach plans are developed and outreach strategies implemented.

B. Measuring Effectiveness

The point of any community outreach effort is that it be effective in reaching the target audience with the message being conveyed.[38] Measuring the effectiveness of an outreach effort answers the question whether and to what extent the outreach objectives were or were not achieved and, thus, is a necessary assurance component of such efforts. This is especially so where, as here, the policy objectives associated with outreach are compelling and the resources being invested toward those ends are extensive. Not having measurement data, or certainly not sufficient measurement data, rendered it impossible to reach objective conclusions about what ACP awareness outreach practices, in fact, are better than others, and speculating about such effectiveness is not within the scope of the task given to the IAC.

Accordingly, the IAC strongly recommends that all stakeholders – federal, state, county, local, Tribal – incorporate strategies for determining the effectiveness of their outreach programs. This will allow them to leverage what is working, improve what is not, and jettison ineffective efforts that cannot be improved as a practical matter.

"The first step in measuring the effectiveness of an outreach program is to determine the number of people reached by the organization's program. Without this information, it is challenging to determine the success of the program."[39] Perhaps the best way to ascertain the effectiveness of outreach is to get suitable feedback from enrollees at the point of enrollment (e.g., "how did you learn about the ACP?", etc.). Of course, the most efficient and practical way to capture this data would be through USAC/FCC –

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[38] *See* G. Weiner, "The 6 Ways to Measure Awareness Campaigns (wholewhale.com) ("A properly created awareness campaign will have a goal and a target audience (steps to setting up an awareness campaign). These should be measurable goals that potentially roll-up into the larger outcomes of the organization.") (last visited 9/28/22).

[39] "How to Measure if Your Outreach Program Was Effective", Anew Media Group, linked here (last visited 9/26/22).

where enrollment occurs – and, thus, it may not be a feasible assurance measure for non-federal government outreach stakeholders. To facilitate stakeholder measurements, thus, the IAC recommends (i) USAC/FCC establish outreach feedback elements where appropriate (e.g., through survey questions appended to applications), and (ii) share that data with state, county, local, and Tribal outreach stakeholders on a periodic basis.

State, county, local, and Tribal ACP outreach planners also are encouraged to track the success of their outreach efforts by looking at the available data (e.g., through USAC's ACP enrollment and claims tracking information, which is available at the state and zip code levels, matched to available data on eligibility within the jurisdiction) as that data tend to relate to the timing of outreach initiatives. There will be some lag, of course, as qualified consumers contact a provider to enroll in the program and as data are uploaded into the system,[40] but not so much lag as to diminish the utility of the data for outreach effectiveness measurements.[41] And, even if subscribership is not a perfect correlate for effective outreach (people may enroll on their own initiative without having been exposed to any outreach whatsoever), it is still a useful data point because of the ability to compare areas (e.g., by zip code) where outreach may have been targeted with areas where it was not, or among areas where outreach may have been qualitatively different. An ideal outreach effectiveness measuring data set might necessarily include subscribership data, point-of-information website feedback, and point-of-enrollment feedback to ensure a wide lens for analysis.

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[40] USAC's enrollment and claims tracker is available here. USAC states that "newly enrolled households and state enrollment data will be updated weekly, zip code data will be updated monthly, and county data will be updated quarterly." Also, USAC provides tracking guidance for ACP outreach campaigns, see https://www.affordableconnectivity.gov/wp-content/uploads/ACP-Campaign-Tracker-One-Pager.pdf. As noted on that page, "If an organization would like to perform outreach to inform consumers about the Affordable Connectivity Program (ACP), USAC recommends that they build a unique campaign URL. This will allow USAC to monitor the traffic from the campaign to the AffordableConnectivity.gov website. USAC can measure the success of the campaign by tracking referrals from the unique URL to AffordableConnectivity.gov."

[41] States should also consider entering "data-matching agreements" with the FCC/USAC that enable automatic confirmation of eligibility by matching the household's information with existing state government data. This process dramatically simplifies ACP enrollment for households, while maintaining data security. Those looking to establish a data matching agreement should contact ACPGovPartners@usac.org. Any data matching agreement must comply with applicable confidentiality and disclosure requirements. Having such data – the denominator – to go with the numerator (those enrolled), should enhance the ability to measure the effectiveness of outreach programs, at least at the state level.

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Outreach Effectiveness Measurement Musts

Create Measurement Buckets

- *Subscribers gained* - People that have opted in for the ACP due to program outreach.
- *Engagement rate* - Number of enrolled subscribers over the total number of subsidy applications.
- *Program Recognition and Recall* - Measure of what percent of people associate the organization's outreach when prompted with the ACP program inquiry.

Get Feedback from Online Visits

- For websites used to provide ACP info to consumers, capture targeted, ACP-specific, feedback at the site regarding visitors' experiences in using the site or in understanding the information provided ("was this information useful?", "were your ACP questions answered?", etc.).

Direct Social Reach

- A measure of the organization's social media channels. The social reach impressions on these channels can be the first stop on the measurement and reporting trends.
- National, state, county, local, or Tribal surveys for target populations can be a great consistent measure of a broad awareness assuming they are done with a large enough sample size and scientific rigor. Annual awareness surveys can be used to discover the base level of people that are aware of the program. Through awareness campaigns, one can see this number increase because of their efforts.

Monitor Site Traffic

- Many campaigns try to drive people to a website and then to do a specific behavior. The best way to track these behaviors can be through tools such as Google Analytics and Google Tag Manager accounts.

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In the following Appendices, the IAC presents additional information of use to ACP outreach stakeholders, including (i) a list of "Frequently Asked [ACP] Questions", and (ii) an organizational "How Do I Get Started" primer.

V. Appendix A – FREQUENTLY ASKED QUESTIONS

The FCC maintains a frequently asked questions (and answers) list on its website, available [here](#). The IAC provides a select list (below) of basic FAQs drawn from the FCC's more extensive list for the reader's convenience.

How do I get a computer or tablet?

Participating broadband service providers can be reimbursed up to $100 if they supply a connected device to an ACP participating household, as long as the household pays more than $10 but less than $50 for the device. In other words, to take advantage of this benefit, it must be done through your participating broadband provider, and you must contribute a portion of the cost. The device benefit is limited to a laptop, a desktop computer, or a tablet. It does not include cell phones. Each household is limited to a single device benefit.

Will I get the funds directly?

No, the Affordable Connectivity Program provides a monthly discount on broadband service of up to $30 per eligible household (or up to $75 per eligible household on qualifying Tribal lands). The Federal Communications Commission will administer the benefit through the Universal Service Administrative Company or USAC. FCC payments will be direct to the internet service provider (ISP), not the household.

What would you receive if your household is eligible?

- Up to a $30 a month discount on your internet service.

- Up to a $75 a month discount if your household is on qualifying Tribal lands.

- A one-time discount of up to $100 for a laptop, tablet, or desktop computer (with a co-payment of more than $10 but less than $50).

- A low-cost service plan that may be fully covered through the ACP.

    - Through a separate non-FCC initiative, no-cost plans may be available to Affordable Connectivity Program enrollees. Visit GetInternet.gov to learn more.

Only one monthly service discount and one device discount is allowed per household. To receive the connected device discount, consumers need to enroll in the ACP with a participating provider that offers connected devices (Note: not all participating providers offer device discounts).

Can individuals residing in homeless shelters receive an ACP benefit?

Yes. The FCC clarifies:

We note that with respect to homeless shelters, the affordable connectivity benefit is limited to one-per-economic-household, and household is defined as "any individual or group of individuals who are living together at the same address as one economic unit." An economic unit is further defined as "all adult individuals contributing to and sharing in the income and expenses of a household." *See* 47 CFR § 54.1600(l). This definition of household recognizes that more than one economic household can reside at the same address, including in group living facilities such as shelters for unhoused individuals. We note that those living in a group facility such as a homeless shelter who do not share expenses could be considered an individual household that would be eligible for the Affordable Connectivity Program.

Can consumers use their ACP discount on bundled services?

Yes. The ACP discount can be applied to the cost of a bundle of services that include voice, texting, or associated equipment in addition to internet. However, if your bundle also includes a TV service, you will be responsible for that portion of your bill, as well as any services that are above the monthly discount.

Can an ACP consumer use their one-time device benefit on a device offered by a provider other than the provider through which that consumer receives ACP-discounted internet service?

No. An ACP consumer can only use their one-time device benefit on a device offered by the same provider through which that consumer receives ACP-discounted internet service. Unfortunately, if the provider through which a consumer receives ACP-discounted internet service does not offer a device option, that consumer cannot use their one-time device benefit while receiving service from that provider.

Are initial service installation charges waived for ACP consumers? Are there any limits to the amount ACP participating providers can charge for initial service installation?

No, the ACP rules do not waive the initial service installation charges. However, if the provider charges an ACP household an initial installation fee, it must be charged on the same terms available to households that are not eligible for the ACP.

Is an applicant who only resides in the community served by a school in the USDA Community Eligibility Provision eligible for the ACP?

No. The applicant needs to have a child enrolled in that school to be eligible for ACP through the USDA Community Eligibility Provision. You can read more about the Community Eligibility Provision in the ACP and the corresponding verifying documentation requirements in paragraphs 52 and following in the Report and Order. More information is also available in the FAQs posted at the FCC's website [here](#).

Are these plans fast?

Many participating providers offer home broadband service with a minimum of 100 Mbps download speed, which is fast enough for a typical family of 4 to video conference, stream movies or TV, and more.

Can I receive both the Affordable Connectivity Program and Lifeline benefits?

Yes. You can also combine these benefits with other state and local benefits where available. They can be applied to the same qualifying service or separately to a Lifeline service and an Affordable Connectivity Program service with the same or different providers. For example, an eligible household could have a Lifeline-supported mobile phone service and a separate home internet service that is supported through the Affordable Connectivity Program.

How much is the discount?

If you qualify for the program, expect to see your Internet bill decrease by up to $30 a month (the money goes directly to your service provider, so you won't need to do anything extra). The sole exception is if you are eligible and currently live on qualifying Tribal lands — if that's the case, you get a discount of up to $75 a month.

Can I sign up even if I didn't receive the Emergency Broadband Benefit?

Assuming you meet the eligibility criteria outlined above, you sure can. The EBB Program was a predecessor to the ACP, not a prerequisite.

What is the breakdown of a household income at 200% of the federal poverty level?

200% of the federal poverty level (as of the table released January 2022). So, for 48 contiguous states and the District of Columbia, the figures are:

- Family of 1: $27,180
- Family of 2: $36,620
- Family of 3: $46,060
- Family of 4: $55,500

VI.   Appendix B – "How Should I get Organized?" Primer

As an elected or appointed official in my region – how should I proceed?

- First, discover what ISPs service your area. This link, https://Broadbandnow.com, though not a government website, provides an easy-to-use tool to get a comprehensive look at your area – delineated by Zip Code.

- By using your local non-profits, school districts and community centers – determine if needs exist that are not being met in terms of Internet availability.

- Have your Municipality/County/Tribal council or township be a convener to bring these parties together.

- Be sure to:

    o Place ACP info on your 'municipal' website
    o Place ACP info in your libraries, community centers and other places of community congregation
    o Don't hesitate to advertise for the ISPs in your area that offer the ACP for free
    o Add ACP information to your utility mailings on a regular basis
    o Add ACP testimonials from your residents (community members) to ALL forms of information distribution

- Find out what ISPs in your area doing to increase participation in the ACP. Work in partnership to increase enrollment in your community by providing complimentary outreach.