



New England Cable & Telecommunications Association, Inc.

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WRITTEN COMMENTS OF THE NEW ENGLAND CABLE & TELECOMMUNICATIONS
ASSOCIATION, INC. IN RESPONSE TO SENATE COMMITTEE ON FINANCE’S
REQUEST FOR COMMENT ON LOW-COST BROADBAND PROGRAMS

January 29, 2020

NECTA is a five-state regional trade association representing substantially all private cable telecommunications companies in Vermont, Connecticut, Massachusetts, New Hampshire, and Rhode Island. In Vermont, NECTA represents Charter Communications, Comcast, and Waitsfield and Champlain Valley Telecom. Our members serve 185 Vermont municipalities with broadband, video, voice, and home security and automation services. Over the past decade, our members have collectively invested over \$200 million developing state of the art networks in Vermont.

NECTA appreciates the opportunity to provide comments to the Senate Finance Committee on our Members extensive programs to provide consumers with affordable internet service—no matter their circumstances. Before, during and after the pandemic, our members play a critical role in connecting Vermonters who face financial, cultural, digital literacy or other complex insecurities or barriers, such as immigration status, English fluency or literacy, that would otherwise prohibit them from having high-speed broadband.

Currently in Vermont, our members provide high-speed broadband to 155,000 homes and businesses through approximately 9,000 miles of fiber. Many of these residences are home to people who qualify for our robust low-cost internet plans. During these extraordinary times, our companies have taken unprecedented steps to keep Vermonters connect throughout the pandemic.

Low-Cost Broadband Plans Closing the Digital Divide for Vermonters

An important connectivity challenge in Vermont is removing the barriers that prevent residents who have access to the internet but have chosen to not “adopt” or subscribe to the service. It is incumbent on the public and private sectors to support Vermont individuals, families and students by providing solutions to these barriers so they can fully participate in online learning and an evolving 21st century economy.

We continue to educate consumers about broadband adoption and the variety of low-cost options currently available to them, including:

[Comcast Internet Essentials](#)

Since 2011, Comcast’s [Internet Essentials program](#) has connected more than 8 million low-income Americans to all the opportunities of a digital world through low-cost, high-speed Internet at home. Comcast partners with local communities to pass on the importance of being connected and provide low-cost Internet service and computers along with free training to unlock online potential.

Since the outset of the pandemic, Comcast has provided 60 days of free access for thousands of low-income families through Internet Essentials. As the nation’s largest broadband adoption program for low-income Americans, it is available to qualified low-income households in Comcast’s service area, with in-home Wi-Fi, and no contracts or credit checks required. Eligible families who qualify for public assistance programs such as the National School Lunch Program (NSLP), Housing Assistance, Medicaid, SNAP, SSI, and other programs qualify for Internet Essentials. With the low-cost service, Comcast also provides the option to Internet Essentials customers to purchase a low-cost laptop or desktop computer and offers free digital literacy training in various languages for customers who need additional assistance.

Comcast’s Internet Essentials Partnership Program

The [Internet Essentials Partnership Program](#) (IEPP) is designed to help accelerate Internet adoption at a critical time. The program provides the opportunity for school districts and other organizations to contract directly with Comcast to quickly provide high-speed Internet service to large numbers of students and families, at no cost to the individual consumers. Since the onset of the COVID-19 pandemic, IEPP has already collaborated with hundreds of schools, school districts, and other organizations across the country. The program, which relies on public-private partnerships, enables entire communities to work together to coordinate funding to help connect K-12 students.

Through IEPP, sponsored families have access to all the benefits Internet Essentials has to offer – a high-speed Internet connection at home, the option to purchase a low-cost computer, and access to free digital skills training in person (if safe), online, and in print. IEPP not only enables more families to connect to the Internet at home, it also allows community-based partners to bring their expertise to empower families to take on the challenges of today while preparing for the future. Since the program’s announcement, hundreds of partnership agreements have been signed with cities across the country. In neighboring Massachusetts, policymakers took the innovative step to add IEPP to the Commonwealth’s statewide vendor list making it even easier for interested communities to participate.

Comcast’s Lift Zones

Established in 2020, [Lift Zone from Comcast](#) is a partnership with local community centers and nonprofits nationwide to provide no charge, enterprise-grade, high-capacity Wi-Fi coverage inside safe spaces. “Lift Zones” are designed to help those students who either don’t have Internet service at home, or who not have a safe or secure environment at home, to get online for distance learning, homework, or other educational activities.

The global pandemic has put many low-income students at risk of being left behind and has accelerated the need for comprehensive digital equity and Internet adoption programs to support them. Lift Zones are intended to help those students who, for a variety of reasons, may be unable to connect to distance learning at home, or who just want another place in which to study. Comcast plans to launch more than 1000 “Lift Zones” in this multiyear program. Comcast has already established more than 60 of these Lift Zones in neighboring Massachusetts.

Spectrum Internet Assist

Established in 2016, Spectrum Internet Assist is Charter Communications’ [low-cost broadband program](#) available to eligible low-income households and seniors. Spectrum Internet Assist provides high-speed internet, a free internet modem, no data caps or contracts, and optional in-home WiFi service. This low-cost program is available to households in which one or more members are a recipient of assistance through the National School Lunch Program (NSLP), the Community eligibility Provision (CEP) of the NSLP, or Supplemental Security Income for people ages 65 and up.

Charter Communications’ Stay Connected K-12

Last October, Charter announced [Stay Connected K-12](#), a new Spectrum Enterprise solution that enables schools to offer high-speed, cable broadband Internet access direct to their students, educators and staff in their own homes so learning and teaching are uninterrupted. Participants are not billed for their services.

Stay Connected K-12 combines the robust speeds and rich features of Spectrum's broadband Internet with simplified program management and billing for local districts through Spectrum Enterprise and is a turnkey solution for their students and educators. Users can enjoy:

- In-home WiFi to connect each WiFi enabled device in the residence.
- Unlimited usage with no data caps, providing schools/districts with a consistent cost per user.
- 24/7/365 technical support, relieving schools/districts of the responsibility of technical support for the end-user connections.
- Self-installation kit with modem and router that allows end-users to get connected quickly and easily, with no intervention required from schools/districts.

Stay Connected K-12 also maximizes flexibility for districts, allowing them to add students to the program when needed, with no minimum term commitment on any of the connections. Charter representatives have been reaching out to school districts across Vermont in Charter service areas to inform them of this program.

National Cable Partnership with Leading Education Non-Profit to Expand Connectivity Solutions

In addition to the above individual programs that Comcast and Charter are offering in their service areas to get Vermonters connected, last September both companies signed onto the national "[K-12 Bridge to Broadband](#)" initiative to help identify families that need an internet connection by working with school districts. Through this national initiative spearheaded by the National Internet and Television Association (NCTA) and EducationSuperHighway (ESH), a national non-profit leading the work to close the classroom connectivity gap, K-12 Bridge to Broadband Program has established a national framework of principles that enables cable broadband providers to work directly with school districts to 1) confidentially share information to quickly identify students without broadband at home, and 2) enable school districts to purchase internet service for families facing economic insecurity through sponsored service agreements.

The core principles reflected in the **K-12 Bridge to Broadband** framework established by ESH and NCTA include:

• ***Cable broadband providers have created a “sponsored” service offering for school districts or other entities.*** School districts across the country have partnered with broadband providers to purchase home access for unconnected families in their school district. In a sponsored service model, school systems purchase broadband on behalf of low-income students at a discounted rate provided by broadband service providers. This arrangement removes a major obstacle for students, getting them the tools they need to learn successfully from home.

• ***Cable broadband providers working together with school districts to identify which students need service.*** School districts and providers work together to facilitate the confidential exchange of information to determine student households that do not currently have service. The systems are built to protect the privacy of student addresses and the confidentiality of provider records but aim to quickly identify households without service.

• ***Cable broadband providers agree to a baseline set of eligibility standards.*** For a school district to rapidly assess which of their students can be connected under a sponsored

service agreement, providers develop baseline eligibility standards to assist districts in evaluating which students qualify for coverage. At a minimum, the baseline standards include households containing students on the federal Free and Reduced Lunch program.

• *To maximize adoption, cable broadband providers minimize the amount of information necessary to sign up families.* In a sponsored service program, providers limit the data they require from families only to that required for providing service (i.e. confirming the service address) and reducing fraud (i.e. proof of identity).

Additional Steps NECTA Members Have Taken to Keep Vermonters Connected

The COVID-19 pandemic has made clear the importance of high-speed internet in Vermont for school, work and connecting with family over the holidays – and broadband providers in Vermont are taking proactive steps to ensure that families and students can stay connected. They have pledged not to terminate service for customers unable to pay their bills, waived late fees, opened up thousands of free Wi-Fi hotspots throughout the state, invested over a billion dollars in programs to help low-income individuals get connected and partnered with municipalities and schools to provide subsidized high-speed internet service at no cost to students or their families.

NECTA is proud to share all the work our member companies are doing to keep Vermonters connected through the programs and initiatives outlined above. NECTA is committed to being a resource during this unprecedented time, and we look forward to our continued partnership so we can ensure that all Vermonters have the opportunity to safely learn and work from home during the ongoing COVID-19 crisis.

Thank you for your time and consideration of these comments. Please do not hesitate to reach out with any questions.

Sincerely,

Timothy Wilkerson
President, NECTA