



July 26, 2021

National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave, NW
Washington D.C. 20230

Re: OMB Control Number 0660–0021

Dear Mr. Goldberg,

On behalf of the National Digital Inclusion Alliance, Public Knowledge and other signatory organizations, we submit these comments in response to the National Telecommunications and Information Administration's (NTIA) Request for Public Comments on OMB Control Number 0660–0021: NTIA Internet Use Survey Questionnaire Development. The National Digital Inclusion Alliance is a unified voice for home broadband access, public broadband access, personal devices and local technology training and support programs. NDIA works collaboratively to craft, identify and disseminate financial and operational resources for digital inclusion programs while serving as a bridge to policymakers and the general public. Public Knowledge is a public interest advocacy organization dedicated to promoting freedom of expression, an open internet, and access to affordable communications tools and creative works.

Overall, the November 2021 draft of the NTIA Internet Use Survey shows significant improvements from prior surveys and will undoubtedly be a valuable tool for gathering essential information about internet use throughout our nation. It is apparent that NTIA has considered and incorporated many of the suggestions made by commenters in producing the latest version of the survey, and we are hopeful these comments will be of further use in continuing to refine and improve the survey.

In these critical times, as the nation continues on the path to recovery from the COVID-19 pandemic, it is especially important that policymakers in Congress and the administration, advocates, and citizens have accurate data about the ways in which the internet is used and what barriers remain to closing the digital divide.

Since long before the COVID-19 crisis, Americans turned to broadband for everything from finding a job to receiving medical care, connecting with loved ones, learning, engaging in democratic processes, and being entertained. Throughout the COVID-19 crisis, the vital

importance of internet access became all the more clear, and yet not everyone in our country has reliable access to high-quality broadband. Closing this digital divide must be one of the top priorities of our recovery efforts, however, our nation does not systematically collect much of the information needed to truly understand and combat this pernicious injustice.

We hope this survey, in its improved form, will help fill in some of the gaps. Nevertheless, there still remain significant ways in which the survey can be expanded and refined to ensure NTIA is collecting the best possible data.

I. Additional Questions are Needed to Assess Digital Literacy and Digital Skills

A national, comprehensive dataset on U.S. residents' levels of digital skills currently does not exist. However, basic digital skills are needed for [75.2 percent of current job openings](#).¹ To better understand which skills U.S. residents lack, we recommend NTIA begin collecting basic skills data from survey respondents. For possible question methodology, [prior comments from Dr. Eszter Hargittai](#), North Carolina's Broadband Infrastructure Office's [state survey](#) (question 10.1), or research from academics in the field such as Dr. Roberto Gallardo or the National Skills Coalition.²

II. Additional Questions are Needed to Assess Connectivity Barriers

Internet access is an essential service that Americans turn to for every facet of daily life. As discussed in our 2020 comments, the importance of internet access has been magnified over the course of the COVID-19 pandemic as families have become even more reliant upon the internet—using it to work remotely, take online classes, receive medical care and connect with loved ones.

One of the primary barriers to internet connectivity is cost. Past NTIA surveys reveal that one of the main reasons people do not subscribe to home internet is because [they cannot afford it](#).³ As a consequence of this, lower broadband adoption is correlated with lower household incomes.⁴

¹ National Digital Inclusion Alliance, *Digital Equity Scorecard* (last accessed July 26, 2021), <https://state-scorecard.digitalinclusion.org/>.

² Dr. Eszter Hargittai, Comment on NTIA Internet Use Survey (September 17, 2020), <https://www.ntia.gov/files/ntia/publications/09182020-hargittai-comments.pdf>; North Carolina Broadband Infrastructure Office, 2020 General Survey, (July 23, 2021), <https://www.ncbroadband.gov/media/224/download?attachment>.

³ John Horrigan, Measuring the Gap: What's the Right Approach to Exploring Why Some Americans do Not Subscribe to Broadband, National Digital Inclusion Alliance (Feb. 2020), https://www.digitalinclusion.org/wp-content/uploads/2020/02/Horrigan_Measuring-the-Gap-v1.1.pdf.

⁴ Angela Siefer, FCC Broadband Report Ignores Affordability Issue, National Digital Inclusion Alliance (May 30, 2019), <https://www.digitalinclusion.org/blog/2019/05/30/fcc-broadband-report-ignores-affordability-issue/>.

We applaud NTIA for incorporating revised questions in its latest draft of the Internet Use survey that pertain to cost and pricing, especially the new LOPRCE question, however NTIA could collect more specific data as it pertains to price from current broadband customers.

As the survey structure already recognizes, internet and broadband service can be obtained or accessed in many ways. Home broadband internet access may be included bundled with other services, while other families may primarily access the internet through mobile devices. A critical part of the picture in determining what barriers exist to connectivity in relation to price is understanding what the price landscape looks like for Americans. NTIA should ask specific questions about how much respondents pay for internet service. This can be done by having respondents simply estimate a total monthly figure for expenses related to internet access (e.g. accounting for both home internet access and mobile expenses) or by asking specific questions about how they obtain internet access, asking for breakdowns of services, and obtaining an estimate of the total monthly expenses so that the amount spent on internet can be evaluated from the responses. This latter approach has been employed in state-level surveys.⁵

Combined with other questions about barriers to broadband adoption, these questions about pricing and monthly expenses related to internet access will enable stakeholders like policymakers and digital inclusion activists to create policies that ensure families can subscribe to broadband at an affordable price point.

III. Additional Questions are Needed to Determine if Connections are Suiting Household Needs

The revised survey has refined its questions to focus on whether or not the service respondents are receiving is adequately meeting their needs. This is critically important information, and questions like HNETQL are essential for assessing whether service providers are fulfilling their obligations to their customers. As discussed in our previous comments, current broadband speeds often fail to meet modern consumer needs, especially over the past year as a result of increased strain on network infrastructure.⁶ This especially has an impact on those in the lowest income groups, perhaps because internet service providers do not invest in maintaining networks in areas that are less profitable.⁷

Three aspects of this issue not addressed in the proposed draft are household simultaneous usage, the disparity between advertised and actual speeds, and service outages. NTIA should ask additional questions about these issues that highlight whether internet connections are

⁵ North Carolina Broadband Infrastructure Office, 2020 General Survey, (July 23, 2021), <https://www.ncbroadband.gov/media/224/download?attachment>.

⁶ Tyler Cooper, Home Internet Connections Holding Steady In Most Major US Cities Amid Shift to Remote Work, Broadband Now (Mar. 17, 2020), <https://broadbandnow.com/report/home-internet-connections-holding-steady-major-us-cities/>.

⁷ Kevin Taglang, The Internet is Not Working for Everyone, Benton Institute: Weekly Digest (May 26, 2020), <https://www.benton.org/blog/internet-not-working-everyone>; Bill Callahan, AT&T's Digital Redlining of Cleveland, National Digital Inclusion Alliance (Mar. 10, 2017), <https://www.digitalinclusion.org/blog/2017/03/10/atts-digital-redlining-of-cleveland/>.

suited household needs, in order to help the NTIA, policymakers, and digital inclusion activists better understand how current service offerings are meeting--or failing to meet--household needs.

On a typical day during the pandemic, one parent could be participating in a videoconference, while another parent video chats with their doctor, and their two children stream online classes. This simultaneous use of high bandwidth activities can place increased strain on home connections, and when multiplied over many households, increased strain on network infrastructure. Yet this pattern of usage may be increasingly common--even in a post-pandemic world--as schools, universities, and workplaces continue to invest in remote and teleconferencing technology.⁸ Thus, it is critical that policymakers, advocates, and practitioners understand whether households have access to broadband speeds that meet their needs. Questions should address how often families engage in this kind of simultaneous use of their home internet connection, and whether they have noticed impacts or degradation in service quality when attempting to do so.

Additionally, the disparity between advertised speeds and actual speeds became more apparent in the past year as households became ever more tethered to their home Internet connections. A question addressing advertised versus actual speeds does not currently appear on this version of the survey, however, it would prove an effective and possibly revealing datapoint to capture with this tool. Asking respondents questions about their ability to perform bandwidth-intensive activities such as video streaming and video conferencing, in conjunction with a questions about what speed they believe they are paying for, and if they believe they are receiving that level of service, will allow NTIA to gather data on whether consumers are actually receiving the level of service they were advertised. It is important to include an option for "I don't know" in the answer key as it would reveal an interesting characteristic about survey respondents and therefore expose a knowledge gap, providing practitioners an opportunity to educate the communities that they serve.

Finally, outages can also severely impair a household's ability to use the internet, and are an important indicator of a network's reliability. An outage during school or work can have serious repercussions for the user and be indicative of a larger issue with the connection. During the COVID-19 pandemic, outages have become more prevalent as broadband networks experience heavy usage. Like broadband speeds, service outages are also more prevalent among those in the lowest income groups.⁹ Survey questions should ask respondents about the length and

⁸ PricewaterhouseCoopers, *PwC US Remote Work Survey* (January 12, 2021), <https://www.pwc.com/us/en/library/covid-19/us-remote-work-survey.html#content-free-1-cbb3>; Katherine Guyot & Isabel V. Sawhill, Telecommuting Will Likely Continue Long After the Pandemic, Brookings Institute (Apr. 6, 2020), <https://www.brookings.edu/blog/up-front/2020/04/06/telecommuting-will-likely-continue-long-after-the-pandemic/>; Mike Miliard, Telehealth Set For 'Tsunami of Growth,' says Frost and Sullivan, Healthcare IT News (May 15, 2020), <https://www.healthcareitnews.com/news/telehealth-set-tsunami-growth-says-frost-sullivan>.

⁹ Kevin Taglang, The Internet is Not Working for Everyone, Benton Institute: Weekly Digest (May 26, 2020), <https://www.benton.org/blog/internet-not-working-everyone>.

frequency of outages, as well as the impact of outages on a household's ability to complete their online activities. This issue is directly tied to the question of whether or not connections are suiting household needs.

IV. Additional Questions are Needed to Assess Changing Uses of the Internet

Since the last Internet Use Survey in 2019, Americans increasingly rely on the internet as a primary conduit for news and information. Especially in the context of the recent national election and the COVID-19 crisis, there have been growing concerns about the proliferation of misinformation on social media, content moderation policies, and the type and quality of information people are accessing online. Some research has shown that online sources of news have outpaced television and print sources.¹⁰ NTIA asks numerous questions about the types of activities respondents engage in online, with questions about news notably absent. Asking questions about this type of usage is significant, as it can provide more information about the prevalence of this type of use, contextualized alongside other factors not normally included in surveys regarding news sources.

Questions on this topic should be phrased carefully to ensure they capture both intentional and purposive behavior and passive ones. For example questions like: "Do you use the internet to research and find information?" and "Do you use the internet to find news about your local community?" are questions that capture an active behavior on the part of the respondent. On the other hand, a question such as "Do you get news from the internet?" may capture passive behaviors, such as being exposed to headlines or articles via social media or on an internet homepage. Information about both of these kinds of behaviors is important for policymakers, advocates, and citizens to understand.

NTIA should consider asking questions about how people use the internet to find information, read news, and stay informed, as it reflects on an essential component of how the internet is used that directly affects our democracy and public life.

V. Suggested Changes to Specific Questions

The survey is effective at framing and describing possible scenarios that consumers may encounter in their use and adoption of the Internet, but the wording needs to be more specific in some sections.

In section DEVQUA, the current wording of the question makes it unclear whether or not a user's device is working as intended, or if the device is able to reliably connect to the Internet. We recommend the following edit:

¹⁰ Elisa Shearer, *More than eight-in-ten Americans get news from digital devices*, Pew Research Center (January 12, 2021), <https://www.pewresearch.org/fact-tank/2021/01/12/more-than-eight-in-ten-americans-get-news-from-digital-devices/>.

“Thinking about all the different devices we just discussed, how reliably do the computers and other devices [you use/used by this household] connect to the Internet? Please do not include home Wi-Fi routers or similar equipment.”

In section HOMTE addressing types of home Internet connections the current iteration of the survey combines cable, fiber, and DSL under one answer. In the interest of gathering more nuanced data, and to align with the practices of several state broadband offices (which ask a similar question), it is recommended to separate out cable, fiber, or DSL into three separate answers. So, the answer key would then look like:

- A) Cable
- B) Fiber
- C) DSL

In sections NOHM and PRINOH of the survey the operative word “cost” is used differently in the options for “B) Can’t afford it” and “C) Not worth the cost.” It is our understanding that these options are designed to address affordability and reliability. We then suggest re-wording the option C to: “C) Service is not reliable in my area”.

VI. Conclusion

In conclusion, NTIA can significantly advance the information that stakeholders like policymakers and digital inclusion activists have about digital literacy, barriers to connectivity, the quality of connections, how the internet is used, and the quality of the data obtained from the Internet Use Survey by adding or refining just a few questions. Answers to these questions can help us to understand the digital divide, and create tailored solutions to close it.

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