



August 1, 2023

Mr. Rafi Goldberg
Senior Policy Advisor, Digital Equity
National Telecommunications and Information Administration
1401 Constitution Avenue NW, Suite 4725
Washington, DC 20230

Submitted via email to rgoldberg@ntia.gov

Dear Mr. Goldberg,

As a national nonprofit organization focused on the device ownership aspect of digital equity, we are delighted to see the robust inclusion of devices within the November 2023 NTIA Internet Use Survey. Owning a computer is crucial for thriving in the modern economy. Those without a computer are unable to harness the vast opportunities that the internet provides, such as employment, education, telehealth, commerce, communication, and much more. Everyone who needs a computer should have one.

This is a watershed moment for advancing digital equity. We offer the following feedback as a means to share our unique perspective, leveraging nearly 40 years of work on the issue of device ownership.

1. Page 1 - LAPTOP. We recommend adding a separate category regarding Chromebooks. We have found that there are limitations unique to Chromebooks that can negatively impact a user's success in some use cases.
2. Page 1 - MPHONE. We recommend that the question be more succinctly worded as *"What about a cell phone, such as a smartphone, that connects to the Internet?"*
3. Page 1 - In this device section, we have concern that the devices listed don't specifically state whether they have internet connectivity capability such as a wifi-enabled laptop.
4. Page 2 - DEVQUA. For this section, we recommend that the question be reworded to specifically ask *"Thinking about all the different devices we just discussed, how well do the computers and other Internet-connected devices [you use/used by this household] function overall?"* The key distinguishing feature is whether the question is asking if the device is in good working condition or if the device works for the intended purpose of the user. For

example, do the device functions/features work properly vs. can the device be used to complete the work needed to be done by the user?

5. Page 6-7 - For each use case, we highly encourage the survey to distinguish by type of device used. For example, in the question regarding the use of the Internet to telecommute or work from home, a user could be performing work using a cellphone, which would be extremely challenging. A key part of this question is whether the device being used is adequate and appropriate for the tasks being completed.
6. Page 11 - NOHM - Recommend adding a new question or answer selection to this section regarding networking equipment not working (such as a wireless router and modem).
7. Page 11 - NOHM, PRINOH - In these two survey questions, we recommend that the three answers bundled together in response number six be split into three distinct answers. By separating "No computing device," "Device inadequate," and "Broken" into distinct answers, the survey results regarding barriers to success will be more granular and actionable.
8. Page 11 - LOPRCE - Add in an additional question "At what price, if any, would [you/your household] buy device?"
9. Additional questions:
 - a. What are the reasons that you are not able to use your device?
 - i. I am not able to troubleshoot or fix my device on my own.
 - ii. I don't know where to find repair support that I can afford.
 - iii. It is broken and I can't afford a replacement.
 - iv. My computer is not able to be repaired.
 - v. I lack a desk/headphones/camera to effectively use my device.

Please see [Digitunity's Device Essentials graphic](#) for more information on the device-related factors that must be considered to ensure successful adoption.

We also support the following additions regarding digital literacy skills, education and employment suggested by the National Skills Coalition:

1. In the past 12 months, have difficulties in using a computer or other technology that requires digital skills stopped you from applying for a job offer or promotion? (YES/NO)
2. In the past 12 months, has there been a work task or responsibility that you were unable to complete because of difficulties in using a computer or other technology that requires digital skills? (YES/NO)
3. In the past 12 months, has there been an educational or learning opportunity that you were not able to participate in because of difficulties in using a computer or other technology that requires digital skills? (YES/NO)

4. Thinking of the most recent time that you needed help using a computer or another digital device (such as a smartphone) to complete a task, where did you turn to for help?

Thank you for considering our input, and please feel free to reach out with questions anytime..

Sincerely,

A handwritten signature in black ink that reads "Scot Henley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Scot Henley
Executive Director
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