

Before the  
**DEPARTMENT OF COMMERCE**  
**NATIONAL TELECOMMUNICATIONS AND**  
**INFORMATION ADMINISTRATION**  
Washington, DC 20230

In the Matter of	)	
	)	
Internet Use Survey	)	OMB Control Number 0660–0021
Request for Comment	)	
	)	

**COMMENTS OF CTIA**

CTIA<sup>1</sup> respectfully submits these comments on the National Telecommunications and Information Administration’s (“NTIA”) Request for Comment on its request for approval under the Paperwork Reduction Act (PRA) to add 65 questions to the November 2023 edition of the U.S. Census Bureau’s Current Population Survey (“CPS”).<sup>2</sup>

CTIA appreciates the opportunity to comment on NTIA’s proposed addition of questions to the CPS to collect relevant data to inform efforts by NTIA and other government agencies to connect all Americans to broadband. CTIA agrees that NTIA’s Internet Use Survey is a tool that can help “inform policies aimed at achieving digital equity so that the Internet’s benefits are

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<sup>1</sup> CTIA–The Wireless Association® (“CTIA”) ([www.ctia.org](http://www.ctia.org)) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

<sup>2</sup> *Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; NTIA Internet Use Survey*, 88 Fed. Reg. 36282 (June 2, 2023) (“RFC”).

accessible to all Americans,”<sup>3</sup> including programs like the Federal Communications Commission’s (“FCC”) Affordable Connectivity Program (“ACP”).

Wireless providers currently are deploying 5G technology that makes high-speed broadband service accessible to more Americans at more competitive prices.<sup>4</sup> Wireless providers also have been instrumental in expanding participation in programs designed to help low-income households afford broadband service, including ACP and Lifeline. ACP, in particular, is a key element of the Biden-Harris Administration’s Internet for All initiative,<sup>5</sup> currently making Internet access service more affordable for nearly 20 million American households—more than half of whom are served by wireless broadband providers.<sup>6</sup>

Given these experiences, CTIA is well-positioned to provide information on issues raised in the RFC, including whether the addition of these questions is necessary and will have practical utility; whether there are ways to enhance the quality, utility, and clarity of the information to be collected; and how to minimize reporting burdens on individuals responding to the CPS.<sup>7</sup>

CTIA believes that NTIA could advance these goals more effectively by making the following relatively minor modifications to the proposed questions:

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<sup>3</sup> *Id.* at 36283.

<sup>4</sup> See, e.g., Press Release, CTIA, *American Consumers Could Save at Least \$8.1B Annually With 5G Home Broadband, According to New Report* (June 15, 2023), <https://www.ctia.org/news/american-consumers-could-save-at-least-8-1b-annually-with-5g-home-broadband-according-to-new-report>.

<sup>5</sup> See, e.g., Internet for All, Programs, <https://www.internet4all.gov/programs> (last visited Aug. 1, 2023).

<sup>6</sup> See Universal Service Administrative Co., ACP Enrollment and Claims Tracker, Additional ACP Data, Total Enrolled ACP Subscribers by Service Type, <https://www.usac.org/about/affordable-connectivity-program/ACP-enrollment-and-claims-tracker/additional-ACP-data/> (last visited Aug. 1, 2023).

<sup>7</sup> See RFC, 88 Fed. Reg. at 36283 (“We are soliciting public comments to permit NTIA to: . . . Evaluate whether . . . the information will have practical utility; . . . Evaluate ways to enhance the quality, utility, and clarity of the information to be collected; and . . . Minimize the reporting burden on those who are to respond . . .”).

***Improving Affordability Data.*** NTIA should augment the questions about respondents’ ability to afford broadband service with inquiries about respondents’ awareness of existing broadband affordability programs such as ACP and Lifeline. Specifically, in instances where respondents indicate that affordability is a factor in their decision-making process about maintaining or subscribing to broadband,<sup>8</sup> respondents should be asked whether they are aware of ACP or Lifeline, and whether the subsidies available under those programs (together or separately) would affect their responses.

For consistency, CTIA also recommends that NTIA coordinate with the FCC regarding surveys of ACP customers that the FCC has indicated it is undertaking to assess broadband affordability.<sup>9</sup>

***Improving Data Utility and Quality.*** NTIA should consider revising or removing proposed questions that, as currently drafted, are unlikely to elicit useful data in light of the information that is actually available to CPS respondents.

Specifically, the proposed question regarding the monthly price a consumer would pay for “home Internet service”<sup>10</sup> is of limited utility, as framed, given the broad array of plans that are offered in the broadband marketplace. Respondents may not be familiar with the range of

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<sup>8</sup> NTIA, *November 2023 NTIA Internet Use Survey*, at 5 (HNETST), 11 (NOHM, PRINOH) (June 2, 2023), <https://www.ntia.gov/sites/default/files/publications/2023-ntia-internet-use-survey-public-comment.pdf> (“Proposed Questions”).

<sup>9</sup> See Government Accountability Office, *Affordable Broadband: FCC Could Improve Performance Goals and Measures, Consumer Outreach, and Fraud Risk Management*, GAO-23-105399, at 73, App. IV (Jan. 2023) (Letter from Mark Stephens, Managing Director, FCC, to Andrew Von Ah, Director, Physical Infrastructure, GAO, at 2 (Dec. 23, 2022) (“[W]e plan to utilize surveys as well as adoption rates by census tract to analyze our progress . . . .Commission staff and USAC are developing a plan informed by the results of the outreach pilot to send a survey on prior Internet use to a greater segment of the ACP enrolled households. We expect to begin sending the survey on prior internet use to broader group of ACP subscribers by July 1, 2023.”)).

<sup>10</sup> Proposed Questions at 11 (LOPRCE).

options available to them, and they may not be aware of programs like Lifeline and ACP that could help them purchase broadband by lowering the cost of service. ACP, for example, provides a subsidy of up to \$30 per month for most eligible households (and up to \$75 per month to eligible households on Tribal lands). Accordingly, the question could be revised, for example, to ask respondents who have not adopted broadband due to affordability whether the availability of a \$30 per month discount would change their purchasing decision.

Likewise, the proposed question regarding whether respondents' broadband service "meets their needs" in terms of speed, reliability, and data caps<sup>11</sup> should be revised because it is unclear whether a sufficient number of consumers will have enough context on typical household broadband use cases to provide meaningful responses.<sup>12</sup> The question would be clearer if it asked respondents instead whether their broadband connections enable them to complete the online activities for which the respondent (or the household) purchased home Internet service.

Finally, the proposed question about the performance of respondents' Internet-connected devices<sup>13</sup> could be clarified to obtain more useful data. The question appears to be designed to elicit information solely about connected devices and not about the performance of the broadband service used to connect those devices (which is studied in other proposed questions). Given that some CPS respondents may have limited technical knowledge, respondents may confuse the two, limiting the value of responses. CTIA suggests that NTIA consider adding clarifying language to the connected device question to ensure that the CPS collects relevant and useful data.

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<sup>11</sup> Proposed Questions at 5 (HNETQL).

<sup>12</sup> See, e.g., CTIA, *5G for Home Broadband Speeds Easily Support the Typical American Household's Needs* (Mar. 2022), [https://api.ctia.org/wp-content/uploads/2022/03/The-Millers-One-pager\\_030122.pdf](https://api.ctia.org/wp-content/uploads/2022/03/The-Millers-One-pager_030122.pdf).

<sup>13</sup> Proposed Questions 2 (DEVQUA).

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CTIA believes that the changes identified above to the proposed CPS questions will enhance the quality, utility, and clarity of the information collected by the CPS, and will help NTIA ensure that new questions in the CPS will have practical utility and do not impose unnecessary reporting burdens on individuals responding to the CPS. In particular, targeted information about consumer awareness and use of programs like ACP could inform how policymakers attempt to reach the remaining households where affordability remains an obstacle to digital inclusion.

CTIA appreciates the opportunity to comment on this new data collection and would welcome the opportunity to collaborate further with NTIA on our shared goal of connecting all Americans to broadband service.

Respectfully submitted,

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August 1, 2023