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RE: RFC Response: OMB Control Number: 0660-0021

The National Digital Inclusion Alliance (NDIA) and Public Knowledge (PK) appreciate the opportunity to respond to the Request for Public Comments (RFC) regarding the [2025 Internet Use Survey Information Collection](#).

NDIA is a non-profit 501(c)(3) organization that advances digital equity by supporting community programs and equipping policymakers to act. We work collaboratively with over 2,000 digital inclusion practitioners in all 50 states, the District of Columbia, all U.S. territories, and 47 Tribal entities. Our affiliates are community-based

organizations, nonprofits, local and state governments, and many others that support individuals using technology to live, learn, work, and thrive in today's digital economy. NDIA's work with our affiliates and a working group of 24 NDIA affiliates who discussed this RFC specifically informs these comments. Public Knowledge is a public interest advocacy organization that promotes freedom of expression, an open internet, and access to affordable communications tools and creative works.

Understanding the barriers to internet access is essential for creating and supporting digital inclusion policies and programs to close the digital divide. NDIA and PK commend NTIA for its dedication to enhancing the Internet Use Survey by incorporating suggestions from public comments. The extensive information collected on internet use by US households in this survey helps policymakers, digital inclusion practitioners, technology and internet service providers, and researchers make informed, evidence-based decisions regarding technology policies, initiatives, and programs, ultimately securing affordable, reliable high-speed internet for everyone in America.

NDIA and PK recommend that the US Department of Commerce and the National Telecommunications and Information Administration (NTIA) incorporate the following recommendations in the 2025 Internet Use Survey:

1. Continue collecting data via the survey and increase its accessibility
2. Revise questions to better understand the barriers to broadband adoption and use
3. Retain and add questions to better understand reliability, affordability, and adoption.

NTIA Should Continue the Internet Use Survey Supplement and Increase Its Accessibility

Established in 1978¹ as the "President's principal advisor on telecommunications and information policy issues," [NTIA](#)'s ability to make informed and impactful policy

¹ P.L. 102538, 106 Stat.3533 (codified at 47 U.S.C. 901904)

recommendations rests on a thorough understanding of internet usage across the nation. However, scarce national internet usage data exists. Thus, NTIA must continue prioritizing the Internet Use Survey supplement to support its policy recommendations to the President by ensuring they are founded in timely and relevant data.

Given the pace of technology advancements and the internet's ubiquity in Americans' daily lives, the Internet Use Survey enables NTIA to understand the public's evolving technology needs and accurately address the barriers that keep American residents offline. This dataset is the largest, most comprehensive, and long-term collection of information regarding how individuals utilize computers and the internet, and the challenges they encounter. Thus, the data are essential for policymakers and digital inclusion practitioners in developing practical solutions for bridging the digital divide.

Additionally, NTIA needs the information obtained from the Internet Use Survey supplement to achieve its mission, which includes "conducting cutting-edge research to inform tech policy decisions, ensuring affordable and reliable high-speed internet service is accessible to all Americans, and developing policies to maintain a safe, secure, and trustworthy internet."² Furthermore, the data informs NTIA's ability to administer grant programs that promote the deployment and use of broadband and other technologies across the country.

The data complement and do not duplicate other data sets, such as the Federal Communications Commission's (FCC) map of broadband availability and the American Community Survey (ACS). While the ACS data is valuable, it is limited to general information about computer ownership and broadband adoption. In contrast, the Current Population Survey (CPS) supplement collects nuanced data on how and why people use the internet and information on internet affordability, reliability, security, and safety. The data are helpful for policymakers in crafting policy solutions, state broadband offices as they update their digital equity plans, digital inclusion practitioners as they design programs, and researchers as they benchmark progress and investigate the digital divide.

² "About NTIA," National Telecommunications and Information Administration, Accessed August 1, 2025, <https://www.ntia.gov/page/about-ntia>

In addition to changes to the survey, NTIA should make the data more accessible, improving its usefulness to researchers, other federal agencies, state and local governments, and digital inclusion practitioners.

NTIA should refrain from increasing its use of automated or online data collection methods as anything other than supplemental methods. Rather, NTIA should maintain the current practices of in-person and telephone interviews as the primary methods of data collection. These traditional methods accurately capture information about individuals who can access the internet and those who can not. While automated or online tools may seem to lessen the reporting burden for respondents in the main CPS and other supplements, they would introduce a significant bias in the Internet Use Survey supplement. This bias would primarily affect respondents most critical to NTIA's work—those facing barriers to internet access and those who use it for limited purposes. Automated and online methods could ultimately increase the reporting burden rather than reduce it, and would almost certainly exclude many respondents from participating.

Suggested Revisions

NTIA Should Revise Its Approach to Ask Why Respondents Do not

Subscribe to Home Broadband

While consistent questions across survey iterations allow for comparative research over time, the responses in the current NOHM version no longer reflect the best practices in the digital inclusion research field. For example, many households cite multiple reasons for not having a home broadband subscription when given the chance. This is supported by findings from most of the 56 state and territory digital equity plans, which identified cost as the primary barrier to adoption. Additionally, these plans recognized intersecting barriers based on surveys conducted with residents.³

³ “Every State Identifies Broadband Affordability as Primary Barrier to Closing Digital Divide,” Pew Research Center, October 4, 2024, <https://www.pew.org/en/research-and-analysis/articles/2024/10/04/every-state-identifies-broadband-affordability-as-primary-barrier-to-closing-digital-divide>.

Likewise, in the intervening years, researchers have continued surveying households to better understand why they are offline and have found the response options listed in the current version of NOHM to be limiting and even misleading. In particular, the “don’t need it or not interested” response option is misleading—when teased apart, most non-adopters cite multiple reasons for not being online, with cost being chief among them.⁴

NDIA and PK join our partners at the Benton Institute for Broadband & Society, and suggest removing the “don’t need it or not interested” response option, allowing the survey respondent to select multiple options, and updating the response options for NOHM to be as follows:

What are the reasons why [you/members of your household] do not use the Internet at home?

- The cost of a home Internet subscription is too expensive
- The cost of a computer is too expensive
- A smartphone internet plan lets [you/your household] do everything you need to do online
- You have other options for Internet access outside of the home that are good enough for your needs
- You cannot get Internet service installed at your residence
- You worry about the privacy and security of your personal data
- You do not have a computer or smart phone
- You are not comfortable using a computer or the Internet
- You do not want high-speed Internet service at home
- You have past-due bills to Internet service providers
- It is too complicated to sign up for Internet service
- Some other reason I haven’t already mentioned

⁴ John B. Horrigan, "Measuring the Gap: What's the Right Approach to Exploring Why Some Americans Do Not Subscribe to Broadband?" (National Digital Inclusion Alliance, February 2020), https://www.digitalinclusion.org/wp-content/uploads/2020/02/Horrigan_Measuring-the-Gap-v1.1.pdf.

NTIA Should Retain or Revise Essential Survey Questions

The proposed NTIA Internet Use Survey for 2025 has eliminated four questions from the 2023 survey. These questions addressed privacy and security concerns when using the Internet, and whether respondents could not use an internet-connected device because it was being used by someone else or located elsewhere. To better understand the importance of privacy, security, and the availability of reliable and accessible devices in accessing the Internet, NTIA should retain these questions and revise them for clarity.

Retain and Revise Device Questions

The 2023 survey contained two questions about accessible and reliable devices: DEVSTA and DEVQUA. Together, the questions collect critical information on the availability and reliability of devices used to access the internet. DEVSTA collected data to help understand if the number of devices in the household was impeding internet access for any household member. The 2025 Internet Use Survey should retain this question to determine a household's device needs to participate fully in the digital world.

DEVQUA asks 'how well' computers and other Internet-connected devices work. This question needs to differentiate between issues that users or households experience with the devices themselves and any challenges related to internet connectivity. A follow-up question should clarify whether the problem is associated with the internet connection or the device's performance. Additionally, the survey should inquire about the need for repairs and technical support to enhance functionality and accessibility features, such as screen size. The question should clarify if the device connects to the internet via a mobile data plan or home internet.

Retain or Revise Privacy and Security Questions

The 2023 Internet Use Survey contained three online privacy and security questions: PSCYBA, PSPRE, and PSCON. Of the three questions, only PSCYBA was included on the 2025 Internet Use Survey. PSCYBA asks whether any household members with internet access have experienced an online security breach, identity theft, or a similar crime in the past year. The Federal Trade Commission (FTC) collects comprehensive

information on online security, and if any of these questions are removed from the survey, it should be this one.⁵

PSPRE asks respondents if they have experienced any privacy or security concerns in the past year that have deterred them from engaging in online activities such as banking, making purchases, posting on social media, expressing opinions, or using search engines. PSCON inquires about respondents' concerns regarding online privacy and security risks, including identity theft, financial fraud, data collection or tracking by the government, loss of control over personal data, and threats to personal safety.

The combination of these two questions provides valuable insights into not only the digital skills and training individuals need to navigate the internet safely and protect their privacy, but also their perceptions and concerns that influence their online behavior. This information does not exist anywhere else at a comparable scale, and thus, the 2025 Internet Use Survey should include these questions. Furthermore, the survey should add or revise questions to gather information about privacy and security concerns related to using artificial intelligence.

Revisions to Specific Questions

The survey effectively frames and describes possible scenarios consumers may encounter when using and adopting the Internet. Still, the wording needs to be more specific in some sections.

JOBSCHE, TELEWK, and EDTRAI all ask questions about using the internet for work, finding and applying for jobs, and engaging in online classes or job training. To differentiate between job seekers and employed workers, the questions should clarify whether the respondent is currently part of the employment marketplace, specifically if they have a job or are looking for work.

⁵ Federal Trade Commission, "New FTC Data Show a Big Jump in Reported Losses to Fraud, to \$12.5 Billion in 2024," news release, March 10, 2025, <https://www.ftc.gov/news-events/news/press-releases/2025/03/new-ftc-data-show-big-jump-reported-losses-fraud-125-billion-2024>.

INSCHL collects data on students' internet usage at schools. One way schools have been addressing the homework gap is by extending Wi-Fi access to school buses.⁶ INSCHL should be revised to include school buses as a designated space for internet use related to school activities.

EGOVTS gathers information from respondents about their experiences accessing government services, such as registering to vote, renewing a driver's license, or applying for government benefits. This question should include civic engagement activities, such as expressing opinions to elected officials or government staff, or participating in public engagement processes.

Suggested Additional Questions

Add Questions to Understand the Cost and Affordability of Home Internet

Internet service costs are a significant reason households lack broadband subscriptions. Yet, additional information is needed to understand households' budget trade-offs to access affordable and reliable home internet. According to research from John Horrigan, four in 10 low-income households have experienced intermittent disconnection due to affordability.⁷ Understanding the impact of lower-quality service and households' budgeting decisions to maintain internet access is also essential.

LPRCE asks respondents what monthly price, if any, they would be willing to pay for home internet service. However, this question lacks critical context regarding home internet costs and it would be helpful to capture respondents' *ability* to pay. We recommend NTIA offer follow-up questions to LPRC, including prompts that ask

⁶ Crystal Montvid, Dave LeNard, "What Schools Should Know About Using E-Rate Funds for Bus Wi-Fi Upgrades," Ed Tech Magazine, May 28, 2024, <https://edtechmagazine.com/k12/article/2024/05/what-schools-should-know-about-using-e-rate-funds-bus-wi-fi-upgrades#:~:text=Bus%20Wi%2DFi%20Serves%20as,by%20using%20the%20%23ConnectIT%20hashtag>.

⁷ John Horrigan, "One More Thing: ACP Boosted Rural Adoption and Helped to Keep the Subscription Vulnerable Online," Benton Institute for Broadband and Society, April, 2025, <https://www.benton.org/publications/one-more-thing>

respondents if they have ever delayed other urgent expenses—such as medical bills, food, or vehicle maintenance—to pay for internet service and whether households have switched to a lower-cost plan with reduced service due to budget constraints.

NDIA and PK applaud the question's intent, HNETST, to determine if a household has temporarily lost its home internet connection in the past six months due to difficulties with payment. However, to gain a better understanding of the choices households are making to maintain internet service, NTIA should repeat the question and ask the respondent whether they lost mobile service due to difficulty paying, and an additional follow-up question to inquire whether the household canceled their home internet service while being able to pay for mobile service, or if the opposite occurred.

Furthermore, NTIA should gather information on the demand for higher speeds in affordable plans, especially as technology evolves and incorporates AI.

Add Questions to Assess the Performance and Reliability of Internet Service

Policymakers, state broadband offices, researchers, advocates, and digital inclusion practitioners must have adequate data to understand whether households can access broadband speeds and reliable performance that meet their needs. HNETQL asks if the household's home internet connection has met the survey respondent's needs over the past six months, considering factors such as speed, reliability, and, if applicable, data caps. Although the connection may seem to "work well" from the respondent's perspective, it may still be insufficient for modern applications like telehealth, remote work, or online learning, especially in multi-person households. Research has shown that lower service plans cannot simultaneously support adults' work tasks at home and children's schoolwork, putting lower-income households at a further disadvantage.⁸ NTIA should ask additional questions about these issues to highlight whether internet connections suit household needs. The survey should

⁸ John Horrigan, "Budgeting for Broadband: What Losing the ACP Means for Household Budgets and Behavior," Benton Institute for Broadband and Society, July, 8, 2025, <https://www.benton.org/publications/budgeting-broadband-what-losing-acp-means-household-budgets-and-behavior>

explore how often multiperson households use their home internet simultaneously and whether they have noticed impacts or degradation in service quality when attempting to do so.

Service outages are directly related to whether internet connections meet the household's needs, and are an essential indicator of a network's reliability. An outage during school, work, or a business transaction can have serious repercussions for the user and indicate a larger issue with the connection.⁹ Survey questions should inquire about the length and frequency of these outages and their impact on a household's ability to complete online activities. Additionally, questions should address whether respondents have experienced any difficulties or disruptions with their home internet connection due to service outages caused by various factors, such as weather, latency, or equipment upgrades. Collecting information on the duration and frequency of these outages is crucial to understanding reliable home service.

Add Questions to Assess Changing Uses of the Internet

Artificial Intelligence

The emergence of artificial intelligence (AI) has sparked conversations about its utility in everything from labor productivity to education. However, significant concerns exist about its effects on the workforce, education, intellectual property rights, and privacy and security issues. NTIA should integrate targeted questions regarding the use of generative AI tools in the USEINT section to collect information on how people use AI, including response options for understanding how people use standalone generative AI tools as well as AI functions integrated into other software and online tools.

Public Safety

Natural disasters remain a significant concern for our country. In 2024, there were 27 separate weather-related disasters, and in 2023, a record high of 28 incidents were

⁹ Arkansas State Broadband Office, "Arkansas Digital Skills and Opportunity Plan" (February 2024), p 56, <https://broadband.arkansas.gov/wp-content/uploads/2024/06/Arkansas-Digital-Skills-and-Opportunity-Plan-Final.pdf>.

recorded, resulting in at least 568 direct or indirect deaths.¹⁰ NTIA should add a new category to investigate the effectiveness of public safety alerts, how access to the internet is necessary for receiving them, and public knowledge about lifesaving online alerts.

Digital Accessibility

NTIA should revise the USEINT responses to include internet-enabled digital assistive technologies and devices that increase digital accessibility for people with disabilities, such as devices that support visually impaired individuals, people with motor and mobility impairments, or people with cognitive impairments.

Conclusion

NDIA and PK recommend that the US Department of Commerce and NTIA continue collecting the Internet Use Supplement to the CPS and implement the above recommendations to improve its utility for communities, policymakers, digital inclusion practitioners, technology and internet service providers, and researchers.

¹⁰ Adam Smith, “2024: An active year of U.S. billion-dollar weather and climate disasters,” January 10, 2025, Climate.gov, <https://www.climate.gov/news-features/blogs/beyond-data/2024-active-year-us-billion-dollar-weather-and-climate-disasters>