Before the
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
U.S. DEPARTMENT OF COMMERCE
WASHINGTON, DC 20230

In the Matter of	)	
	)	
Agency Information Collection	)	
Activities; Submission to the Office of	)	
Management and Budget (OMB) for	)	**OMB CONTROL NUMBER 0660-0021**
Review and Approval; Comment	)	
Request; NTIA Internet Use Survey	)	

COMMENTS OF THE BENTON INSTITUTE FOR BROADBAND & SOCIETY

Andrew Jay Schwartzman
Senior Counselor
Benton Institute for Broadband & Society
andyschwartzman@gmail.com
202-241-2408

Caroline Stratton
Research Director
Benton Institute for Broadband & Society
caroline@benton.org
847-220-4531

6

August 18, 2025

These comments are submitted in response to the June 16, 2025, invitation of the National Telecommunications and Information Administration (NTIA) to submit comments on proposed and continuing information collection pursuant to the Paperwork Reduction Act.[1] The purpose of this collection is to help the agency fulfill its mandate to assess the impact of its proposed and continuing information collection requirements, while minimizing reporting burdens to the extent possible.

The Benton Institute for Broadband & Society is public internet nonprofit focused on addressing broadband access and adoption. It serves as a trusted, go-to resource for policymakers, advocates, researchers, and local leaders working to close the digital divide. The NTIA Internet Use Survey is an essential and unique source of data about digital access and adoption in the United States. The Survey is the only national data collection exercise that allows governments, researchers and advocates detailed insight into internet use and users. Benton, like many researchers across the Nation, relies heavily on the data collected through the survey. It helps Benton recommend policies and develop programs to ensure everyone in the United States benefits from universal, high-performance broadband.

The contributors to these comments are: Benton Institute for Broadband & Society's Executive Director, Dr. Revati Prasad, Benton's Research Director, Dr. Caroline Stratton and Benton Senior Fellow, Dr. John Horrigan. Their credentials are set out in Appendix A.

---

[1] Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; NTIA Internet Use Survey, 90 Federal Register 25591 (June 17, 2025).

Recommendations

The request for comments seeks suggestions to "enhance the quality, utility, and clarity of the information to be collected." With that in mind, the Benton Institute for Broadband & Society recommends the following:

1. **Collecting more detailed information about interruptions to Internet use would enhance utility.**

   The survey offers an opportunity gather more information about device-related constraints and interruptions to Internet use. DEVQUA produces limited information about device functionality-related constraints. HNETST offers a good model for posing questions about financial constraints related to devices—the Benton Institute suggests gathering additional information about the role that devices may play in Internet non-use[2]. The following two questions would add detail beyond respondents' perception of how well their devices work to get at the impacts of device inoperability:

   At any point during the past six months, did [you/this household] temporarily lose access to the Internet because the device(s) you use to go online wasn't working?

   At any point during the past six months, did [you/this household] temporarily lose access to the Internet because of difficulty paying to fix or replace the device(s) you use to go online?

   In addition to device-related interruptions, more detailed information about the challenges of maintaining an Internet subscription would be useful. With respect to HNETST, Benton Institute research[3] notes that subscribers may downgrade service (select a lower speed of service or a plan with more limitations on service), cut other expenses in a household budget, or even seek new sources of income to maintain service. To better capture these phenomena and advance research on subscription vulnerability, the following questions would be useful.

   At any point during the past six months, did [you/this household] change your Internet service plan to a lower speed or lower quality of service to be able to afford the monthly subscription?

   At any point during the past six months, did [you/this household] cut an expense or seek additional income to be able to afford your Internet service plan?

---

[2] The 2022 Making Ends Meet Survey found that 30% of respondents experienced a major unexpected expense for computer or mobile phone repair.
https://files.consumerfinance.gov/f/documents/cfpb_making-ends-meet-in-2022_report_2022-12.pdf

[3] https://www.benton.org/sites/default/files/Budgeting4Broadband_0.pdf

Finally, HNETST as currently written may cause respondents to ignore the situation in which they temporarily lose a home Internet connection while maintaining a mobile data plan. A follow-up question to those responding *Yes* to HNETST, such as, *Did you maintain subscription to a mobile data plan while you were without a home Internet connection?* would permit discerning if some means of access were preserved.

2. **Reducing the number of questions about topics where behavior is well understood would allow for inclusion of new items about less well-known phenomena and reduce reporting burden on a large portion of respondents.**

The questions that follow INTINT refer to Internet use in places that have long been the subject of digital divide and inequality research. INHOME remains useful to know; however, other items are of less utility. INWORK, for example, makes no distinction between personal use of the Internet at work versus on-the-job professional use, so this item captures smartphone users staying connected throughout the day as well as work that entails computer use.

Phenomena of greater interest here regard users who do not use the Internet at home (INHOME) but do use it at community anchor institutions (INLICO), others' homes (INELHO), businesses (INCAFE), on public transit (INTRAV) or other locations (INOTHR). Posing the series of questions about place only to those respondents who respond "NO" to INHOME would reduce burden on some respondents.

Additionally, positioning these questions after TCHINT and subsequent questions about home Internet would allow for identification of those with home Internet and a mobile data plan, for whom the INTINT series of questions does not produce information that is especially useful.

The Benton Institute sees limited utility in the items TRADTV and PREVTV.

3. **Minor changes to USEINT items would enhance clarity.**

The Benton Institute suggests revising the list of items in EGOVTS, as not all U.S. jurisdictions allow individuals to register to vote or renew a driver's license online. Items that may be more universal include looking up information about elections, contact information and hours for government offices, and transit schedules.

The language in PUBLSH to distinguish between "*original video*" and "*video taken for personal use and uploaded to social media*" is likely to confuse respondents. The Benton Institute recommends clarifying the intent of this item, which may intend to capture publication of original video, audio, and text for a broad audience, or the use of multimedia editing and publishing tools to create and share content.

The Benton Institute recommends adding Facebook Marketplace to the examples in EGOODS.

The upcoming survey may also be a good opportunity to introduce an item about the use of generative AI tools such as ChatGPT, Copilot, Gemini, and so on.

PSCYBA refers to an important phenomenon for study; however, the Benton Institute recommends collecting information in greater detail about respondents' experiences and perceptions of risk and harm online as described in #4.

4. Collecting detailed information about risk and harm online will allow for better understanding of pressing issues.

The Benton Institute finds the draft survey does little for understanding how risk and harm relate specifically to Internet use and non-use, which should be relevant for NTIA and the Department of Commerce. A recent Pew Research survey[4] finds that Americans encounter scam calls, texts, and emails at least weekly and that almost three-quarters of American adults have experienced some sort of material harm or loss related to a scam. Additionally, NTIA's previous efforts to understand youth social media use and mental health[5] suggest an opportunity to collect information about this concern.

The Benton Institute recommends adding questions about the following:

- How confident the respondent feels about identifying scams and fraudulent activity online.
- How concerned the respondent is about scams and fraudulent activity online.
- If the respondent/household has lost money due to a scam or fraudulent activity online.
- How confident the respondent feels about being able to protect their personal/household privacy when using the Internet.
- How concerned the respondent is about breaches of personal/household privacy online.
- If the respondent/household has experienced a breach of personal/household privacy associated with using the Internet.
- How concerned the respondent is about possible effects on personal/household members' mental health associated with using the Internet.
- If the respondent/household has experienced negative effects on mental health associated with using the Internet.

---

[4] https://www.pewresearch.org/internet/2025/07/31/online-scams-and-attacks-in-america-today/#government-and-tech-companies-efforts-in-reducing-online-scams-and-attacks
[5] https://www.ntia.gov/sites/default/files/reports/kids-online-health-safety/2024-kohs-report.pdf

5. **Collecting information about digital skills and literacy would help address a critical data gap.**

Though various government data products allow for researchers to understand access to Internet and devices, data about Americans' digital skills are scarce.[6] The Internet Use survey is an ideal instrument to address this data gap, which impacts workforce development and education, among other sectors.

The Benton Institute recommends adding questions regarding the following:

- How a respondent seeks help when they do not know how to do something that they want or need to do online. Response options should include asking people and organizations (e.g., others in the household, a friend, staff at public libraries and other community anchor institutions, classes at a local organization), as well as self-study options (e.g., YouTube).
- If the respondent has adequate sources of help, if needed, for doing tasks online that come up in their daily life.
- If the respondent has learned a new computer skill (e.g., how to use a software application or a website) for work or to improve their job prospects in the last six months.

6. **Revising the collection of information about non-adopters would increase its quality.**

Benton noted in 2023 that item NOHM has not changed to reflect that reasons for not subscribing to home Internet may have changed over time. While this allows for continued analysis of responses across years of the survey, the quality of information it produces has likely lessened over time. In particular, it is well established that nearly everyone does need an Internet connection to participate in society and the economy, so the "*don't need it or not interested*" response may at this point be true only of a very small portion of the population (specifically, the "don't need it" part of the response). More likely, such a response may reflect stigma about not being able to afford devices and connectivity or not knowing how to use them, or that other means of access are adequate for respondents' needs. Benton suggests rewriting 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 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*

---

[6] https://nationalskillscoalition.org/blog/future-of-work/what-state-leaders-need-to-know-about-measuring-digital-skills-options-and-opportunities/

- *You cannot get Internet service installed at your residence*
- *You worry about the privacy and security of your personal data*
- *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*

APPENDIX A: CONTRIBUTING RESEARCHERS

Benton Institute for Broadband & Society Executive Director Dr. Revati Prasad defines and implements Benton's strategic vision in service to Benton's mission and in consultation with Benton's Trustees and Board of Directors. She oversees Benton's programmatic work, managing staff and our relationships with Benton experts, partners, and supporters. Previously in her roles as Benton's Research Director and Vice President of Programs, Revati led Benton's contributions to evidence-based policy solutions to advance universal, equitable broadband access, adoption, and application. Dr. Prasad holds a Ph.D. in Communication from the Annenberg School for Communication at the University of Pennsylvania and an MPA from Columbia University's School of International and Public Affairs. Her doctoral work examined efforts to "connect the unconnected" in rural India, including telecommunications policy, infrastructure projects, and small networks run by WISPs. Dr. Prasad's research has been published in *Media, Culture & Society; Information, Culture & Society; Communication, Culture and Critique*; and *Journalism*. She has received awards from the Global Communication and Social Change and the Media Industries Divisions of the International Communication Association.

Benton Institute for Broadband & Society Research Director Dr. Caroline Stratton directs the Benton Institute's research efforts to support a broadband-for-all agenda. She leads and facilitates research that demonstrates the benefits of broadband adoption and the costs of disconnection for individuals and communities.

Dr. Stratton holds a Ph.D. in Information Studies from the University of Texas at Austin and a BS in Nuclear & Radiological Engineering from the Georgia Institute of Technology. She has conducted research about digital inequality and inclusion in previous roles at the National Digital

Inclusion Alliance and at Florida State University. Her work on telecommunications, technology, and information policy topics has been published in *Government Information Quarterly, New Media & Society, Journal of Urban Affairs,* and other scholarly outlets. Her research is informed by her experience designing and delivering digital inclusion programs for the public in Austin, Texas.

Benton Institute for Broadband & Society Senior Fellow John Horrigan is a national expert on technology adoption, digital inclusion, and evaluating the outcomes and impacts of programs designed to promote communications technology adoption and use. He served at the Federal Communications Commission as a member of the leadership team for the development of the National Broadband Plan. Additionally, as an Associate Director for Research at the Pew Research Center, he focused on libraries and their impact on communities, as well as technology adoption patterns and open government data. Earlier in his career, Horrigan was a staff officer for the Board on Science, Technology, and Economic Policy at the National Research Council. Horrigan received his Ph.D. in public policy from the University of Texas at Austin and his B.A. in government and economics from the University of Virginia.