ALAAmericanLibraryAssociation

Christopher Quarles, Policy Advisor National Telecommunications and Information Administration (NTIA) 1401 Constitution Avenue NW, Suite 4725 Washington, DC 20230

Submitted via email to cquarles@ntia.gov

August 18, 2025

Re: 2025 Internet Use Survey Information Collection OMB Control Number 0660-0021

Dear Mr. Quarles,

Libraries are one of the cornerstones for equitable access to information and broadbandenabled services in their communities, and they have been at the forefront of digital equity and access for decades. Therefore, the American Library Association¹ (ALA) is pleased to submit our comments regarding NTIA's request to add 61 questions to the November 2025 edition of the U.S. Census Bureau's Current Population Survey (CPS)². NTIA's Internet Use Survey data has been collected for more than three decades and is foundational for policymakers, researchers, and advocates to understand the current state of internet access and use, as well as long-term trends.

The federal government has been making significant investments to expand broadband infrastructure, connecting unserved and underserved communities to affordable, reliable, high-speed internet. These programs benefit many libraries and the communities they serve.

As the government continues to fund broadband deployment and adoption, it is essential for a broad range of stakeholders—such as state and community broadband leaders, policymakers, lawmakers, federal, state, and local agencies, nonprofits, corporations, and libraries—to have

¹ ALA is the foremost national organization providing resources to inspire library and information professionals to transform their communities through essential programs and services. For more than 140 years, ALA has been the trusted voice for academic, public, school, government, and special libraries, advocating for the profession and the library's role in enhancing learning and ensuring access to information for all. ALA represents the nation's 123,000 libraries, which includes over 17,000 public libraries.

² National Telecommunications and Information Administration. <u>Agency Information Collection Activities;</u> <u>Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; NTIA Internet Use Survey.</u> Federal Register, June 17, 2025.

the data we need to assess these programs, identify opportunities, and bridge gaps. This data will help us measure our progress toward ensuring that every resident in the U.S. has access to reliable, high-speed broadband internet so they can meet their economic, social, and educational goals. ALA has the following comments after reviewing the proposed 2025 NTIA Internet Use Survey.

Understanding Barriers to Access

We appreciate that the question **HNETST** was included in the 2023 and 2025 surveys.

At any point during the past six months, did [you/this household] temporarily lose a home Internet connection due to difficulty paying?

However, additional information about the barriers people experience in *maintaining* their internet subscription is also needed. As Benton Institute for Broadband & Society (Benton Institute) states in its comments:

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?

ALA agrees that this additional information helps in understanding the barriers and choices people make when deciding how to maintain their internet access and asks NTIA to consider adding these questions to the survey.

We ask that two more options be added to **NOHM** to better understand why a household does not have internet at home. The options are:

- Have access to the internet outside of the home that is good enough for your needs
- Cannot get Internet service installed at your residence

Internet access is only one piece of the puzzle. Households also need access to working devices, and many will turn to their local library when a laptop, printer, or router breaks, and they are

waiting for it to be repaired or replaced. Therefore, we request that the 2023 **DEVSTA and HEDEVSTA** questions *not* be removed from the 2025 survey.

At any point during the past six months, were [you/members of your household] unable to use a computer or other Internet-connected device because it was in use by someone else, located elsewhere, or otherwise inaccessible?

We also endorse Benton Institute's recommendation of adding two *new* questions to the survey to better understand how the lack of a device impacts internet access. The questions are:

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?

Having internet access isn't enough; households also need an adequate number of working devices to connect members of the household. Understanding barriers to access and adoption is crucial for identifying potential obstacles to using the internet.

Terminology

INWORK. We appreciate the updated language to the question because it recognizes that the respondent may work outside of the home in a location other than an office. The additional examples should make it easier for the respondent to answer correctly.

MOBDAT. We request that the hotspot response option remain in this question. Hotspot was included in the 2023 survey, but it is not part of the 2025 survey. Many libraries and other non-profits lend hotspots to residents who lack internet access at home. Additionally, we question the use of the term cell phone instead of the term smartphone when the term smartphone is used in other survey questions. The survey should use consistent language throughout. Smartphone is also more accurate in this question, as a smartphone is more likely to have the capability to provide internet access.

HOMTE: We appreciate the inclusion of option #3 as a choice. Fully wireless internet service is a way for residents to access the internet at home. As more options become available through various internet service providers, it is important to track its adoption.

Better Understanding of Risks and Harms

We appreciate that **PSYCBA** appears in both the 2023 and 2025 surveys; however, we are concerned that additional questions about privacy and security from the 2023 survey were removed. It is important to understand people's experiences AND perceptions about potential concerns and harms they could experience when using the internet. To better understand respondents' perception about privacy and security issues related to internet use, ALA recommends reinstating the 2023 **PSCON** question in the 2025 survey and also adding an additional choice to address the growing use of AI. The new choice would read *Concern about artificial intelligence and misinformation*.

Including **PSCON** in the 2025 survey allows stakeholders who use this survey to track and analyze changes over the years. However, the prevalence of AI in our daily lives has significantly increased since the 2023 survey. Therefore, respondents' perceptions of AI's impact and potential harms should be documented and tracked over time.

Digital Literacy's Impact on Adoption

There is another barrier to internet use and adoption that the survey does not address: the lack of digital skills needed to fully participate in the educational, social, civic, and economic benefits of the internet. Questions should be added to the survey to better understand how digital skills and confidence influence internet use and adoption. The Benton Institute has proposed questions that can address this concern. They include:

- 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.

ALA agrees with adding these proposed questions to better understand this aspect of broadband access, adoption, and use.

Conclusion

ALA thanks the NTIA for the opportunity to comment and provide input on the *NTIA Internet Use Survey* questions. Thank you for your consideration and review of our comments.

Respectfully submitted by:

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