

**Before the  
National Telecommunications and Information Administration  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Agency Information Collection Activities;</b>	)	
<b>Submission to the Office of Management</b>	)	<b>OMB Control Number 0660-0021</b>
<b>And Budget (OMB) for Review and</b>	)	
<b>Approval; Comment Request;</b>	)	
<b>NTIA Internet Use Survey</b>	)	

**COMMENTS OF ERIKA HEEREN-MOON  
August 18, 2025**

My name is Erika Heeren-Moon, I am a Ph.D. student at the School of Public and International Affairs at Virginia Tech. I am writing in response to the Request for Comment published by the National Telecommunications and Information Administration (“NTIA”) on June 17, 2025. The NTIA seeks comment on adding 61 questions to the November 2025 edition of the U.S. Census Bureau’s Current Population Survey (CPS), also known as the Internet Use Survey.

**Recommendations to Enhance the Quality, Utility, And Clarity  
of the Information to be Collected.**

The information provided by the Internet Use Survey is both useful and accessible to policy researchers and policymakers. While other sources, such as the National Broadband Map<sup>1</sup>, provide information on which areas have Internet service, understanding how that service is utilized at the state level is necessary to provide context for evaluating existing policies and making informed decisions on future policymaking and implementation design. The Internet Use Survey is an established, trusted source of this information and is therefore a promising vehicle to gather more nuanced data at the state level. To that end, I am writing to make the following recommendations to improve the Internet Use Survey.

***Recommendation: Include More Granular Geographic Context.*** The Internet Use Survey could benefit from including a question on whether the respondent lives in an urban, suburban, or rural area as a reference point for context in the overall survey responses. By

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<sup>1</sup> National Broadband Map: <https://broadbandmap.fcc.gov/home>.

establishing context for the respondent's proximity to a major city, the responses to the questions proposed would be more valuable for policy researchers and policymakers. For example, if most of the samples are taken from urban areas, that does not necessarily reflect Internet use and digital equity indicators in rural areas. Since the data is presented at the state level, adding this question would provide useful local demographic context without risking personal data vulnerability for the respondent. While the zip code of the respondent is collected in the greater CPS<sup>2</sup>, it is not applied to the Internet Use Survey dataset. If this data is already being collected as part of the CPS, adding the zip code variable to the Internet Use Survey dataset would also be vastly beneficial for policy evaluation of digital equity programs and making informed rural infrastructure development decisions.

***Recommendation: Increase Qualitative Data Collection Opportunities on the Survey.***

The Internet Use Survey could benefit from the addition of open-ended questions that allow respondents to provide additional insight into their selection for the following existing questions:

**NOHM** - "What are the reasons why [you/members of your household] do not use the Internet at home? *(if only one option selected)*).

**PRINOH** - "Of the reasons you just listed for not going online at home, which [do you/does your household] consider to be the most important?" *(if more than one option selected under the first question)*.

I recommend adding "Please explain your selection" after each of these questions with the opportunity for the respondent to type in their response in their own words in sentence form. These questions should be optional to avoid respondents opting out of continuing the survey. By combining the structured responses and the respondent's more comprehensive rationale, the full dataset would allow analysts a deeper, more nuanced insight into the question of why people opt out of Internet access. Such insight would be valuable in identifying differences in local concerns and barriers to digital equity.

Respectfully Submitted,

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<sup>2</sup> Current Population Survey, November 2023 Technical Documentation, Attachment 6 (6-10).