![National Urban League logo] National Urban League

VIA ELECTRONIC MAIL

August 18, 2025

Christopher Quarles
Policy Advisor
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave, Suite 4725
Washington, DC 20230
Via Email to: cquarles@ntia.gov

Subject: Request for Comment on NTIA Internet Use Survey, OMB Control No. 0660-0021

Dear Mr. Quarles:

The National Urban League, a historic civil rights and economic empowerment organization founded in 1910, submits these comments in response to the National Telecommunications and Information Administration's (NTIA) request for public input on the 2025 Internet Use Survey. Through our 92 affiliates in 36 states and the District of Columbia, the National Urban League currently serves over 300 communities in 36 states and the District of Columbia, providing direct service to 2 million people annually. We advocate for policies that advance economic opportunity for all, eliminate racial disparities, and expand pathways to prosperity.

For over a decade, the National Urban League has led in advancing broadband access, adoption, and digital skills development for communities historically excluded from the digital economy. The National Urban League has long recognized that the digital divide denies the people we serve equal access to healthcare, education, employment, and civic and political engagement. We consistently advocate for policies and programs that increases access to affordable high-speed broadband and technology so that African Americans and communities of color can successfully take advantage of these digital

services and opportunities. In 2021, the organization released the *Lewis Latimer Plan for Digital Equity and Inclusion[1]*, a comprehensive roadmap to achieve universal, affordable broadband access, promote digital literacy, and ensure equitable participation in the digital economy.

We welcome the opportunity to comment on NTIA's proposed questions for the 2025 Internet Use Survey and recommend refinements that will strengthen the survey's ability to measure the persistent and emerging factors driving the digital divide. This comment includes a thematic overview of our recommendations, followed by a detailed table in **Appendix A** identifying which questions we recommend retaining as-written, which   can be improved by modifications, and where entirely new items are warranted.

Recommendation: Strengthen Affordability and Service Quality Data

Affordability remains the most frequently cited barrier to broadband adoption in low-income households, even when infrastructure is available. The Affordable Connectivity Program (ACP), which ended in 2024, provided a monthly subsidy to over 23 million enrolled households at the time of termination.[2] The program's termination created an immediate risk of disconnection for millions of low-income families, seniors, and veterans who had come to rely on the $30 monthly subsidy (or $75 in Tribal areas) to maintain service. Its expiration is projected to widen adoption gaps unless affordability is systematically tracked and addressed in federal data collections.

While NTIA's proposed questions on reasons for non-subscription are valuable, they do not sufficiently capture the complexity of affordability challenges. Without robust, ongoing measurements of affordability challenges, including post-ACP impacts, policymakers and community-based organizations lack the evidence to design durable, targeted interventions. Survey questions must go beyond whether a household has internet service to examine:

- Whether service is at risk of disconnection due to cost.

- How households prioritize expenses when faced with unaffordable bills.

---

[1] "The Lewis Latimer Plan for Digital Equity and Inclusion." National Urban League. https://nul.org/sites/default/files/2021-04/NUL%20LL%20DEIA%20041421%20Latimer%20Plan_vFINAL_1136AM.pdf

[2] Universal Service Administrative Company, Affordable Connectivity Program Enrollment Data, Feb. 2024, https://www.usac.org/about/affordable-connectivity-program/

- Whether families are forced to rely on lower-quality or mobile-only plans due to price.

These questions are necessary to capture the true scope of affordability barriers, consistent with findings from Pew Research Center that cost is a persistent deterrent even when infrastructure is available.[3]

We recommend edits to:

- Collect granular data on total monthly costs, including taxes, fees, installation charges, deposits, and required equipment purchases.

- Capture credit check requirements and the impact of data caps and overage fees.

- Identify households that lost service following ACP termination or were previously eligible but unenrolled.

The National Urban League urges NTIA to collect detailed broadband cost data, including monthly price (promotional vs. standard), fees, deposits, and whether credit checks or past-due balances blocked access to service.

Recommendation: Strengthen Data Collection on "Lack of Need or Interest" as a Barrier to Adoption

NTIA's most recent Current Population Survey shows that "lack of need or interest" is now cited nearly four times as often as affordability as the reason for non-subscription.[4] Importantly, NTIA itself has acknowledged that this response often reflects underlying issues such as lack of digital skills, accessibility barriers, or distrust of providers.[5]

The termination of the ACP further illustrates this complexity: nearly half of the 48 million households eligible for subsidies never enrolled, despite service being free or nearly free for many.[6] This enrollment gap demonstrates that affordability and perceived relevance are

---

[3] Pew Charitable Trusts, *Broadband Affordability Remains Key to Closing the Digital Divide*, https://www.pewtrusts.org/en/research-and-analysis/articles/2023/04/27/broadband-affordability-remains-key-to-closing-the-digital-divide
[4] NTIA, *Digital Nation Data Explorer – Internet Use Survey* (2023), https://www.ntia.doc.gov/data/digital-nation-data-explorer
[5] NTIA, *NTIA Internet Use Survey: Lack of Need or Interest* (2021), https://www.ntia.doc.gov/blog/2021/ntia-internet-use-survey-lack-need-or-interest
[6] FCC, *Affordable Connectivity Program Enrollment and Claims Tracker* (2024), https://www.fcc.gov/affordable-connectivity-program

interconnected. If households lack the skills, trust, or confidence to see broadband as essential, subsidies alone will not drive universal adoption.

The National Urban League therefore urges NTIA to add follow-up questions for households citing "lack of need or interest" to identify whether:

- Digital skills limitations contribute to perceptions of irrelevance.

- Distrust in providers, government programs, or online safety discourages subscription.

- Accessibility challenges (e.g., disability or language barriers) are miscategorized as "lack of need."

By refining its survey instrument, NTIA can provide policymakers and community-based organizations with actionable evidence to design interventions such as skills training, culturally competent outreach, and trust-building initiatives that directly address the root causes of non-subscription.

Recommendation: Capture greater detail on access to and adequacy of Devices

Even where service is affordable, inadequate devices limit full participation in the digital economy. Households relying solely on smartphones face difficulties applying for jobs, completing schoolwork, or accessing telehealth[7]; activities that require larger screens, keyboards, and reliable processing power. Brookings Institution research confirms that device access is closely linked to educational outcomes and economic mobility.[8] The Benton Institute has likewise stressed that digital equity requires "devices that meet user needs" rather than minimal connectivity alone.[9]

The survey's proposed devices questions do not differentiate between household-level and per-person access, nor does it measure whether devices are adequate for work, education, healthcare, and civic participation.

Consistent with the positions in the *Lewis Latimer Plan*, we recommend:

- Adding questions on the ratio of functional devices to household members.

---

[7] Pew Research Center, "Mobile-only internet users in the United States" (2024), https://www.pewresearch.org/internet/2024/02/28/mobile-only-usage
[8] Brookings Institution, "Digital Prosperity: How Broadband Can Deliver Health and Equity to All Communities," 2020, https://www.brookings.edu/research/digital-prosperity/
[9] Benton Institute for Broadband & Society, "Devices for All," 2022, https://www.benton.org/topic/devices-for-all

- Assessing device age, condition, and compatibility with essential applications.

- Identifying shared device usage and limitations for privacy-sensitive tasks.

NTIA's proposed questions should explicitly measure the type, age, and adequacy of devices in the home, not simply whether "a device" is present.

Recommendation: Expand survey questions on skill levels, self-efficacy, and training opportunities

Digital skills training is the multiplier that turns access into opportunity. Without the ability to navigate online tools, assess information credibility, or use emerging technologies, connectivity alone cannot close equity gaps. The *Lewis Latimer Plan for Digital Equity and Inclusion* calls for sustained investment in skills programs, particularly for older adults, individuals with disabilities, and communities of color historically excluded from tech sectors.

Data from the Pew Research Center also indicates that low digital literacy is a barrier for nearly one-third of non-adopters, with disproportionate impacts in rural and low-income urban communities.[10]

The proposed survey would benefit from a more robust measurement of digital skills beyond binary comfort levels. The National Urban League recommends including a short, validated digital skills index, covering competencies such as:

- Sending email with attachments.

- Using multifactor authentication.

- Installing and updating software.

NTIA should continue and expand survey questions on skill levels, self-efficacy, and training opportunities accessed in the last year. Capturing data on these skills would provide a more nuanced understanding of the prevalence of the skillset that underpin meaningful adoption and enable residents to fully leverage online opportunities.

---

[10] Pew Research Center, "Digital Literacy and the Digital Divide," 2021, https://www.pewresearch.org/internet/2021/06/22/

Recommendation: Capture Data on Barriers Beyond Cost and Digital Skills

Affordability and skills are not the only barriers. Language access, digital accessibility for people with disabilities, and distrust of online systems all affect adoption. Brookings and Joint Center research show that concerns about privacy and data misuse are especially prevalent among African Americans and Latinos.[11]

Although the current survey includes a list of reasons for non-adoption, it omits several significant barriers. We recommend adding explicit response options for:

- Language access issues;

- The need for accessible equipment or assistive technology for people with disabilities; and

- Reliance on others to navigate online services.

Likewise, Pew's research has shown that privacy and data security concerns are particularly pronounced among communities of color, impacting both adoption and usage patterns.[12] These proposed additions would generate actionable insights for program design, particularly for interventions tailored to immigrant, low-literacy, and disabled populations.

Recommendation: Including questions on emerging technology

Artificial intelligence, automation, and immersive platforms are rapidly changing workforce requirements. Communities already at the margins of connectivity are at risk of falling further behind if their adoption barriers are not addressed in advance. As AI-enabled tools, telehealth platforms, and advanced online learning environments become integral to economic mobility, NTIA's survey must anticipate these shifts. We recommend adding questions to assess:

- Use of AI tools in employment, education, and healthcare contexts.

- Comfort with AI-driven decision-making.

- Access to training on emerging digital tools.

---

[11] Joint Center for Political and Economic Studies, "Digital Equity for African Americans and Latinos," 2022, https://jointcenter.org/digital-equity-report/
[12] Pew Research Center, *Privacy and Security Concerns and the Internet*, https://www.pewresearch.org/internet/2023/11/15/privacy-and-security-concerns-and-the-internet/

Adding questions measures of the skills needed for emerging technologies, will position NTIA and partners to align digital readiness and training strategies with the evolving economic landscape.

Recommendation: Improve data access by building the NTIA Data Explorer

NTIA's Data Explorer enables easy tracking of metrics from the Internet Use Survey which provides interactive visualizations and public-use datasets. This tool is an essential starting point for equity-driven analysis.

To maximize its utility for national and community-based advocates, we recommend:

1. **Timely Integration**: Incorporate new 2025 metrics into the Data Explorer within six months of survey completion.

2. **Localized Drilldowns**: Enable county- or ZIP-level exports where privacy safeguards allow.

Such improvements align with the *Lewis Latimer Plan*'s call for open, actionable data to inform policy and targeted programmatic interventions at every level.

Conclusion

Robust, disaggregated, and publicly accessible data is the foundation of effective broadband and digital equity policy. By strengthening the Internet Use Survey to capture affordability, service quality, device adequacy, skills, barriers, and emerging technology exposure, and by ensuring that the resulting data is available to both national and community-based organizations, NTIA can equip policymakers and advocates with the tools needed to advance equity and ensure that all communities can participate fully in the digital economy.

For questions or further discussion, please contact Adeyinka Ogunlegan, Chief of Staff & Vice President, Federal Affairs at aogunlegan@nul.org

Appendix A – NTIA's Proposed Questions and National Urban League Recommendations

Topic	NTIA Draft Covers	NUL Recommendation	Action
Device inventory (LAPTOP, MPHONE, etc.)	Captures presence	Add device-per-person ratio, sharing, and source	**Edit**
Device quality (DEVQUA)	Single overall rating	Disaggregate adequacy by device type and age	**Edit**
Service quality (HNETQL)	Yes/no "meets needs"	Broaden beyond satisfaction to include whether service is sufficient for school, telehealth, or remote work	**Edit**
Affordability (HNETST)		Retain existing affordability questions for longitudinal data, but expand to capture: (1) all monthly costs including taxes/fees/equipment; (2) whether service is at risk of disconnection due to cost; (3) forced reliance on mobile-only service. Also track households that lost service after ACP termination (May 2024).	**Edit + Add**
Device adequacy	None	Expand device-related questions to distinguish between primary device type, number of devices in the household, and condition/age	**Add**
Digital skills	None	Add skills index, confidence, source/outcome	**Add**
Non-adoption reasons (NOHM)	General barriers	Add language, accessibility, MDU constraints, proxy help	**Edit**
Mobile-only reliance	Inferred	Add explicit mobile-only core tasks item	**Add**
AI exposure	Voice assistant only	Add AI tool use and comfort questions	**Add**