

February 21, 2023

Marlene H. Dortch
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Implementing the Infrastructure Investment and Jobs Act: Prevention and Elimination of Digital Discrimination, GN Docket No. 22-69, Notice of Proposed Rulemaking, FCC 22-98

Ms. Dortch:

Our coalition of stakeholders representing the Latino community appreciates the opportunity to comment on the Commission's open proceeding regarding the Prevention and Elimination of Digital Discrimination – GN Docket No. 22-69.

As the Commission goes about implementing key provisions of the Infrastructure Investment and Jobs Act (IIJA) relating to equal access to the internet, it is crucial that we provide adequate access to digital resources in Latino communities. Regardless of location, age, or income, every American should be connected to the internet.

Many communities across America are on the wrong side of the digital divide – and communities of color remain alarmingly disconnected. 22 percent of Black households and 31 percent of Latino households need broadband access, a number that is two times higher than White households.

The digital divide in Latino communities isn't a new problem, and there is no single solution that any one stakeholder can use on their own to close the digital divide. To deliver on our nation's internet for all promise, public, private, and nonprofit partners must work together to expand high-quality internet access and increase broadband adoption across the United States.

To “facilitate equal access to broadband” – as mandated by the IIJA – and prevent digital redlining in Latino communities, the following steps can be taken:

1. **Partner with internet service providers to offer discounted or subsidized plans** for low-income families and utilize public spaces like libraries and community centers to provide free Wi-Fi.
2. **Provide digital literacy training** by working with local organizations to offer classes and workshops on basic computer skills, internet safety, and online resources.
3. Promote cultural relevance by working with local Latino organizations **to create culturally specific programs and content** in numerous languages.
4. Encourage technology innovation by **investing in technology startups** founded by Latino entrepreneurs and hosting hackathons and coding events in Latino communities.

5. Address the digital divide in education by **providing schools in underserved areas with technology and digital resources** and offer after-school technology programs.
6. Consider rural and urban differences by **investing in infrastructure development in rural areas**. These investments will revolutionize the nearly one thousand majority Latino communities across rural America.

From our coalition's perspective, connectivity gaps are not the result of widespread discrimination by ISPs; they are the result of years of poorly timed and targeted broadband funding programs that have left Latino communities underserved.

In a recent study, former FCC chief economist Glenn Woroch found that 100/20 Mbps internet service is available to 93.8% of census-based "non-white" households, compared to 88.8% of "white" households. Availability does not guarantee access and this is where our focus should be to close the digital divide. The funds allocated by Congress require solutions that understand the needs of underserved communities, engage the right partners and trusted community members, and target the gaps that have exacerbated the problems.

With unprecedented broadband funding on the way, we have the perfect opportunity to close the digital divide and connect communities of color to online opportunities. Now is the time to double down on our broadband affordability and adoption efforts to capitalize on the availability of widespread broadband internet access and provide the education and access our underserved communities desperately need and want.

We appreciate the chance to comment on this important proceeding, and we look forward to working with the Commission to fulfill our nation's bold connectivity mission.

Sincerely,

MANA, A National Latina Organization
Esperanza United
GreenLatinos
Hispanic Heritage Foundation
HTTP
Justice for Migrant Women
Labor Council for Latin American Advancement (LCLAA)
The Latino Coalition
National Association of Hispanic Federal Executives (NAHFE)
National Hispanic Foundation for the Arts (NHFA)
SER, Jobs for Progress National Inc.
Society of Hispanic Professional Engineers (SHPE)
United States Hispanic Chamber of Commerce (USHCC)