

**Before the
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
Washington, DC 20230**

In the Matter of

**National Telecommunications and Information Administration
Seeks Comment on Infrastructure Investment and Jobs Act
Implementation**

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) **Docket No.**
) **220105-0002**
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COMMENTS OF THE NATIONAL HISPANIC MEDIA COALITION

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The National Hispanic Media Coalition (NHMC) respectfully submits these comments in response to the National Telecommunications and Information Administration (“NTIA”) January 10, 2022 Public Notice, requesting commenters provide NTIA comments on the implementation of the Infrastructure Investment And Jobs Act (IIJA).¹ NHMC is a 35 year-old nonprofit organization that advocates for civil rights, eliminating hate, ending racism, and discrimination against the Latino Community. To achieve these goals, NHMC utilizes education, policy work, and media advocacy.

¹ *National Telecommunications and Information Administration Seeks Comment on Infrastructure Investment and Jobs Act Implementation*, Docket No. 220105-0002, Public Notice (2022) (“Public Notice”).

I. Introduction

As NHMC has commented on previous comment periods for the implementation of federal initiatives to promote the deployment of adequate infrastructure to close the digital divide, we believe the National Telecommunications and Information Administration (NTIA) must be focused on using the best means to reach, train, and inform underserved communities that have been historically and intentionally marginalized from the essential resources required to thrive in our digital age. Therefore, advocacy and nonprofit organizations, such as NHMC, wish to provide our insights to the NTIA on best practices to effectively and equitably implement aspects of the IJA for Latinx and other underserved communities.

On November 15, 2021, President Biden signed into law the IJA, which included \$65 billion to “help close the digital divide and ensure all Americans have access to reliable , affordable high-speed broadband.”² Of that \$65 billion, \$48 billion will be administered by NTIA’s Office of Internet Connectivity and Growth.³

To meet NTIA’s goal to close the digital divide, and properly connect historically marginalized communities, such as the Latinx community, NTIA must increase outreach from itself, state, local, and advocacy organizations which have direct connections to their communities. To successfully deploy federal broadband initiatives the NTIA must collaborate with nonprofits such as NHMC to help create the lowest barriers for the equitable and affordable deployment of broadband infrastructure and services to close the digital divide, and meet the essential goal of quality and reliable internet access across the nation.

II. General Questions

² See generally Public Notice.

³ *Id.*

A. Bringing Reliable, Affordable, High-Speed Broadband to All Americans

Questions 1-2

One of the most important steps the NTIA can take to ensure the IJA's broadband programs meet their goals with respect to access, adoption, affordability, digital equity, and digital inclusion is to work alongside advocacy and nonprofit organizations, such as NHMC and our allies, that have direct access, familiarity, and relationships to the communities that are most affected by the digital divide. These are historically and intentionally marginalized communities and other disenfranchised groups that have been detrimentally overlooked due to several issues, including language barriers and systemic racism and discrimination.

Closing the digital divide to establish a reliable and affordable broadband infrastructure is essential to function in everyday activities in today's society. From work to education and healthcare, it is apparent that closing the digital divide is a critical sign of the times, however, in order to meet those goals the NTIA must listen to different perspectives from diverse communities that have previously been ignored. NTIA's ability to provide grant programs under IJA, such as the Digital Equity Planning grants, will enable collaborations with state governments and nonprofits, such as NHMC, that have the expertise to adequately provide outreach and address the needs of communities we directly represent.

B. Supporting States, Territories, and Sub-Grantees to Achieve the Goal

Question 5:

The NTIA should offer technical assistance to all localities that lack the expertise or work force to properly implement the required infrastructure to deploy and establish resilient broadband infrastructure. The NTIA should require collaborations between states, territorial, and

funding recipients, to address any concerns unique to either topographical, urban, rural, or climate considerations. Building a resilient broadband infrastructure that is able to withstand severe weather events to maintain vital communications and services must be a priority to all entities involved. For example, in the aftermath of Hurricanes Irma and Maria, nearly 3,000 U.S. citizens in Puerto Rico died, and damages due to the storm totaled an estimated \$100 billion—including damage done to telecommunications infrastructure like wireline and wireless broadband.⁴ Several of the deaths following the storm were due to a lack of or the destruction of the telecommunications services infrastructure, which prevented several storm victims from receiving emergency services. Therefore, NTIA must provide assistance and guidance to build reliable and resilient broadband and telecommunications infrastructure by working with states, localities, territories and nonprofits, to address the specific needs of historically marginalized communities. This includes providing resources to train local workers to build resilient infrastructure and provide outreach aware of unique needs of localities and underserved communities.

III. Implementation of the Digital Equity Act of 2021

Questions_25-26

The Digital Equity Act (“DEA”) allocated \$2.75 billion to establish digital equity and inclusion initiatives to promote the meaningful adoption of and use of broadband services. These initiatives include grant programs such as (1) State Digital Equity Planning Grants, (2) State Digital Equity Capacity Grants, and (3) Digital Equity Competitive Grants.

⁴ A new investigative project could identify more Hurricane Maria deaths in Puerto Rico, NBC News, Sept. 9, 2020, <https://www.nbcnews.com/news/latino/new-investigative-project-could-identify-more-hurricane-maria-deaths-uerto-n1239690>

While only Digital Equity Competitive Grants will be directly accessible to nonprofits that provide digital equity services, NTIA should encourage states and localities to use all grant funding to work alongside nonprofits to plan, develop, and implement measures to expand internet accessibility. These outreach grants should be used to immediately and rapidly encourage participation by underserved communities. Not only are advocacy and nonprofit organizations well acquainted with the specific needs of the communities they serve, but they are also trusted within the community. Therefore, as best practice, NTIA should readily provide applicable grant funding to reliable nonprofits, and encourage states to use their resources to collaborate with trusted messengers, like advocacy and nonprofit organizations, who are better suited to encourage “hard-to-reach” consumers to engage in outreach efforts.

Collaborations between states, localities, and other funding recipients will enable the constructive efforts to equitably implement State Digital Equity Plans (SDEP), by revealing the actual needs of marginalized and underserved communities, as well as the best means to rectify those oversights. SDEPs should focus on the collection of generalized racial and ethnic demographic data, to accurately determine whether the communities in the greatest need are successfully participating and benefiting, while ensuring privacy concerns and protections.

NHMC believes that not knowing which groups are truly benefitting from these grants, programs, and initiatives to close the digital divide create greater concerns. Each community has unique needs, and we must ensure that those needs are being considered and met, and without the full picture of how marginalized communities are participating, the NTIA will have flawed perceptions of the success of the IJJA to close the digital divide among marginalized communities like Latinx.

IV. Digital Equity Coordination Requirements

Question 30

Despite being nearly twenty percent of our nation's population,⁵ and having \$1.9 trillion in collective buying power,⁶ Latinx are often overlooked in terms of digital access and affordability needs. With a third of Latinx households lacking access to the internet, affordable and reliable internet access and broadband infrastructure are essential for the progress and prosperity of our community.⁷ Therefore, to adequately consult with historically marginalized and disadvantaged groups, specifically individuals with a language barrier or those who are members of a racial or ethnic group, NTIA should require itself and all grant recipients to provide culturally appropriate non-English language services, materials, and campaigns.

Acknowledging language and cultural differences is key to ensuring the successful participation of previously underserved communities. NTIA should prioritize non-English language speaking communities in the development of messaging, marketing materials, and other outreach efforts . This includes ensuring that materials are translated in a manner that is easy to both read and communicate to the everyday individual. Additionally, NTIA should support qualified outreach participants that are on the ground with training and materials to assist

⁵ U.S. Census Bureau, Quick Facts, <https://www.census.gov/quickfacts/fact/table/US/RHI725219> (last visited Feb. 4, 2022).

⁶ Selig Center for Economy Growth, University of Georgia, The Multicultural Economy Report (2021), <https://www.terry.uga.edu/about/selig>; J. Merritt Melancon, *Consumer buying power is more diverse than ever*, UGA Today (Aug. 11, 2021), <https://news.uga.edu/selig-multicultural-economy-report-2021/>.

⁷ Luis Noe-Bustamante, Jens Manuel Krogstad & Mark Hugo Lopez, *For U.S. Latinos, COVID-19 Has Taken a Personal and Financial Toll*, Pew Research Center (July 15, 2021), <https://www.pewresearch.org/race-ethnicity/2021/07/15/for-u-s-latinos-covid-19-has-taken-a-personal-and-financial-toll/>.

those who may have literacy issues, accessibility issues, or a specific dialect that requires in-person assistance.

Requiring proper non-English services and materials will enable the NTIA, states, localities, and all funding recipients to equitably plan, develop, and implement SDEPs to close the digital divide for historically underserved non-English communities. The NTIA could further monitor the success of these initiatives and practices by requiring quarterly reports from states, localities, and all funding recipients detailing the amount of personnel, resources, and funds dedicated to non-English outreach and actual expansion of covered populations.

CONCLUSION

In conclusion, NHMC urges the NTIA to seriously consider the comments provided, to immediately begin the equitable deployment of initiatives and programs authorized by the IJA to close the digital divide. The NTIA must focus its efforts to provide the lowest barriers and increase outreach from itself and advocacy organizations which have direct connections to underserved communities, and improve data collection and reporting practices. Working alongside advocacy and nonprofits organizations, such as NHMC, NTIA will be able to meet its goals equitably deploy resources to expand broadband infrastructure and close the digital divide for historically underserved and marginalized communities, such as Latinx.