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August 18, 2025

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Re: Request for Comment on National Telecommunications and Information Administration (NTIA) Internet Use Survey; FR Doc. 2025-11114

UnidosUS, the nation's largest Latino civil rights and advocacy organization, and the undersigned organizations respectfully submit the following comments on NTIA's 2025 Internet Use Survey. For more than 55 years, UnidosUS has advanced economic opportunity for Latino families and ensured that America's promise is open to all who contribute to its strength. With nearly 300 community-based Affiliates in 37 states, Washington, D.C., and Puerto Rico, we are deeply invested in a future where every household can access the tools to thrive in a modern economy—especially affordable, reliable internet.

As civil rights and digital opportunity advocates, we view digital access as core infrastructure. Sound digital opportunity policy can help build a more productive workforce, strengthen family resilience and wellbeing, and ensure benefits offered by investments in health, education, and employment initiatives or programs yield results. We value NTIA's Internet Use Survey as a vital source of data for strong digital equity policy and welcome this opportunity to provide recommendations that could enhance the survey's ability to capture digital inclusion barriers.

These comments focus on ensuring that NTIA's survey captures the full scope of barriers preventing Latino, Black, and other historically disconnected families from accessing this essential infrastructure. The following recommendations would help NTIA's survey capture three core areas that determine full digital participation— supporting the "three-legged stool" of digital inclusion:

- Access to affordable, reliable home broadband
- Access to functional, connected devices like desktops or laptops (not just smartphones)
- Access to digital skills training

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Without these three interconnected and interdependent elements working together, federal broadband investments will fail to reach their intended beneficiaries.[1] Existing federal data collection falls short across all three dimensions, undermining policy effectiveness, weakening program outcomes, and helping to perpetuate the digital divide.

Adoption Gaps Are Undermining Smart, Effective Policy and Limiting Communities' Chances of Full Digital Participation

NTIA's Internet Use Survey, which is conducted every other year, provides useful information enabling policymakers and other stakeholders to track a variety of metrics related to internet adoption and use, to develop and implement policies aimed at continued progress in these areas. NTIA's Data Explorer makes this material accessible and understandable for a broad audience. However, more frequent and more granular data collection would enable more effective policies.

The latest Internet Use Survey shows persistent adoption gaps among various demographic groups, including those in rural areas, those with less education and less income, and racial and ethnic minorities. In 2023, the share of Americans reporting a home broadband subscription was 85% nationally, but 81% in rural areas; 71% among households earning less than $25,000; 69% among those without a high school diploma; and about 83% for African American and Hispanic households – which leaves about 7.8 million Black households and 11 million Latino households without internet.

Other surveys corroborate these gaps. In contrast to NTIA's findings, 73% of Hispanic and Black adults, respectively, report having home broadband, compared with 83% of White adults.[2] Further, 22% of Latino adults and 19% of Black adults rely on a smartphone to access the internet, compared with 12% of white adults.[3] Without both reliable, full access devices and stable, affordable internet at home, millions of families struggle to apply for jobs, complete schoolwork, or access health care online—tasks that increasingly define modern economic participation and overall wellbeing.

The Affordable Connectivity Program (ACP), a monthly benefit program that ran from December 2021 to May 2024, generated $2 in economic benefit for every $1 spent, yielding

[1] UnidosUS, Prosperity for All: A Latino Policy Resource for the 119th Congress, https://unidosus.org/publications/prosperity-for-all/, (January 24, 2025).
[2] Pew Research Center, Internet, Broadband Fact Sheet, https://www.pewresearch.org/internet/fact-sheet/internet-broadband/ (last visited July 2025).
[3] Pew Research Center, Internet, Broadband Fact Sheet, https://www.pewresearch.org/internet/fact-sheet/internet-broadband/ (last visited July 2025).

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$16.2 billion in annual benefits and $28.9-29.5 billion in healthcare savings alone.[4] Termination of the ACP in June 2024 created what researchers call a "bandwidth tax"—the cognitive burden of managing digital scarcity that prevents low-income families from focusing on economic mobility activities like job training or pursuing advanced technical career pathways.[5]

Following ACP's termination, research shows that half of former ACP households experienced service disruptions, with 36% downgrading to cheaper plans and 13% losing service entirely.[6] This underscores the need for enhanced survey data to track how policy changes affect household internet behavior on an appropriately frequent basis, particularly as state and federal broadband programs are created or terminated and this impacts access and adoption.

Affordable home internet, plus a device, is just part of the equation for full digital participation, particularly in our increasingly automated and digitally driven world. According to National Skills Coalition research, nearly one-third of U.S. workers lack foundational digital skills, with workers of color falling disproportionately into this category.[7]

Some 92% of jobs now require digital skills, yet significant disparities persist: Latinos comprise 18% of the overall U.S. workforce but represent 35% of workers with no digital skills, while Black workers are 12% of all workers, but are 21% of those with limited digital skills.[8] In industries that employ significant numbers of Latino, Black, and immigrant workers—including construction, manufacturing, and accommodation services— many

[4] John B. Horrigan, PhD, Benton Institute for Broadband and Society, https://www.benton.org/publications/budgeting-broadband-what-losing-acp-means-household-budgets-and-behavior, July 8, 2025.
[5] John B. Horrigan, PhD, Benton Institute for Broadband and Society, https://www.benton.org/publications/budgeting-broadband-what-losing-acp-means-household-budgets-and-behavior, July 8, 2025.
[6] John B. Horrigan, PhD, Benton Institute for Broadband and Society, https://www.benton.org/publications/budgeting-broadband-what-losing-acp-means-household-budgets-and-behavior, July 8, 2025.
[7] Amanda Bergson-Shilcock, National Skills Coalition, The New Landscape of Digital Literacy, https://nationalskillscoalition.org/resource/publications/the-new-landscape-of-digital-literacy/#:~:text=According%20to%20NSC's%20latest%20report,In%20particular%2C%2013%20percent%20have (May 20, 2020).
[8] Amanda Bergson-Shilcock, National Skills Coalition, The New Landscape of Digital Literacy, https://nationalskillscoalition.org/resource/publications/the-new-landscape-of-digital-literacy/#:~:text=According%20to%20NSC's%20latest%20report,In%20particular%2C%2013%20percent%20have (May 20, 2020).

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workers have not had sufficient opportunity to build technological competencies, despite changing job requirements that rely on these competencies.

These gaps—across connectivity, devices, and skilling—form interlocking structural barriers that systematically undermine full digital adoption, workforce participation, and economic mobility. We urge the NTIA to coordinate with the U.S. Census Bureau and other agencies to align survey questions and data standards to identify these gaps and the populations that are affected by them.

Stronger, more robust data that captures regional and community-level nuances impacting digital opportunity should result in more targeted and efficient digital infrastructure policy, especially as programs like the Broadband Equity, Access, and Deployment (BEAD) program and other technology investments are being implemented.

NTIA Should Pilot New Questions to Capture How Language Barriers Limit Digital Access and Adoption

Language barriers create what researchers call a "digital language divide"—"the disparity between languages in terms of digital content availability, accessibility, and technological support."[9] With English as the dominant internet content, those with limited English proficiency (LEP) face systematic exclusion from digital services designed primarily for English speakers.

This exclusion is measurable: immigrants who speak a language other than English at home have been found four times as likely as English speakers to have no experience with computers.[10] Additionally, a study on Asian Americans found that 64% of LEP respondents said that language access was a barrier to high-speed internet and those with language access limitations were also more likely to not have sufficient devices at home.[11]

Lawmakers across political ideologies recognized the severity of these gaps, designating "individuals with barriers to the English language (including English language learners and those with low literacy)" as a covered population who disproportionately experience digital

[9] Chinasa T. Okolo and Marie Tano, Closing the gap: a call for more inclusive language technologies, The Brookings Institute, https://www.brookings.edu/articles/closing-the-gap-a-call-for-more-inclusive-language-technologies/ (December 12, 2024).
[10] Benton Institute for Broadband & Society, Language Barriers and Digital Equity, Visions of Digital Equity, https://www.benton.org/blog/language-barriers-and-digital-equity (September 5, 2023).
[11] Asian Americans Advancing Justice AAJC, Digital Divide: In the Asian American, Native Hawaiian, and Pacific Islander Communities, https://www.advancingjustice-aajc.org/publication/digital-divide-asian-american-native-hawaiian-and-pacific-islander-communities, https://www.advancingjustice-aajc.org/publication/digital-divide-asian-american-native-hawaiian-and-pacific-islander-communities (May 21, 2024).

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inequity in the Infrastructure Investment and Jobs Act's (IIJA) Digital Equity Act (DEA).[12] Yet current federal data collection continues to inadequately capture how language barriers intersect with technology access and use.

Even following the ACP, households facing language barriers often become "subscription vulnerable," experiencing episodic service disconnections that exacerbate digital exclusion. The National League of Cities found that "many governmental programs operate only in English," and that "language access, including in public information campaigns, advertisements, and program enrollment processes, is a driving force in keeping LEP residents from getting digitally connected."[13]

It is crucial to understand these issues as federal broadband investments like BEAD and other access programs are implemented with taxpayer funding. Without comprehensive data on how language barriers affect digital service access, policymakers cannot design targeted interventions that address the implications of digital exclusion.

NTIA should pilot new questions assessing language barriers to gather actionable data on how language affects online service access, use, and adoption. Questions to capture this information would include:

- In what language(s) do you primarily:
  - Configure devices
  - Search for information online
  - Access government services digitally
  - Communicate with healthcare providers

- Have language barriers ever prevented you from:
  - Accessing online services
  - Using a digital device or app
  - Enrolling in government services or benefits
  - Completing online forms

- "Do you regularly rely on another person to help use digital devices or access online services? If yes, who?"

[12] Infrastructure and Jobs Act, 2021, https://www.congress.gov/bill/117th-congress/house-bill/1841/text.
[13] National League of Cities, State of the Digital Divide in the Hispanic Community, https://www.nlc.org/resource/state-of-the-digital-divide-in-the-hispanic-community/ (November 2021).

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The last question is important to understand how limited-English speakers, older adults, and individuals with less access to technology navigate digital tasks.

Gathering these insights would enable agencies to design multilingual digital deployment initiatives and community-based programs from the outset, ensuring that broadband investments like BEAD help close the digital divide as Congress intended.

An Updated Survey Should Address Skills Gaps to Support Workforce Development Goals and Investments

Skills gaps can undermine workforce development goals and investments. Because digital skills gaps persist , federal data collection must move beyond measuring whether households have internet to assessing whether they can confidently use that access day to day.

Existing federal surveys provide little insight into how households are using the Internet for essential economic tasks, like applying for jobs, banking, or completing online trainings for job advancement. Without baseline data, programs cannot identify which specific digital tasks workers struggle with most, target interventions effectively, or measure whether upskilling initiatives improve outcomes.

The absence of skills data is particularly problematic as the “bandwidth tax”—the cognitive burden of managing digital scarcity—prevents low-income families from focusing on economic mobility activities like job training or pursuing advanced technical career pathways. Understanding skills and confidence levels would help distinguish between households with limited digital skilling due to access barriers versus those who have access but lack the capacity to adequately use technology.

Questions to surface these insights include:

- How confident are you with the following tasks:
    - Setting up new devices
    - Protecting personal information online
    - Using digital tools for work or education
    - Teaching others to use digital tools

- I would like skills training on the following:
    - Setting up new devices
    - Protecting personal information online
    - Using digital tools for work or education
    - Teaching others to use digital tools
    - Banking or paying bills

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Better measuring digital literacy and skills gaps will allow more targeted, performance-based workforce and education programs to ensure public investments and education support upskilling where it is most needed.

Survey Questions about AI Exposure and Usage Are Needed

As AI becomes embedded in daily and essential services, different levels of public understanding of the limitation of AI risks replicating and amplifying digital divides. New surveys show that users have widely varying comfort levels and exposure with and to AI across racial, language, and educational lines, suggesting that without proactive measurement, AI adoption could follow the same inequitable patterns as previous waves of technology.[14]

The same communities experiencing broadband adoption gaps, device limitations, and digital skills shortages face additional sources of exclusion as AI-powered systems increasingly mediate access to employment, healthcare, and financial services, while cognitive bias towards automated outcomes makes decisions less challengeable. As 92% of jobs now require digital skills, and technology continues to reshape workforce requirements, understanding AI becomes critical for preventing additional barriers to economic mobility.

The absence of baseline AI interaction data undermines policymakers' ability to design effective technology governance policies before harmful disparities become entrenched. As federal investments in digital infrastructure scale up through programs like BEAD, measuring AI exposure alongside traditional connectivity metrics would help.

We recommend adding a section to understand how Americans interact with emerging technologies:

- In the past six months, have you used:
    - Voice assistants (*e.g.*, Siri, Alexa)
    - AI-powered translation tools
    - Automated chatbots for customer service
    - AI recommendations (including shopping and streaming)
    - AI tools for work or creative projects

[14] Michelle Faverio and Alec Tyson, What the data says about Americans' views of artificial intelligence, Pew Research Center, https://www.pewresearch.org/short-reads/2023/11/21/what-the-data-says-about-americans-views-of-artificial-intelligence/ (November 21, 2023). *See also* Rakesh Kochhar, Which U.S. Workers Are More Exposed to AI on Their Jobs?, Pew Research Center, https://www.pewresearch.org/social-trends/2023/07/26/which-u-s-workers-are-more-exposed-to-ai-on-their-jobs/ (July 26, 2023).

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- How often can you tell when you're interacting with an AI system?
    - Always
    - Most of the time
    - Sometimes
    - Rarely
    - Never

- Which better describes how you feel about the amount of control you have over how artificial intelligence (AI) is used in your life?
    - I am comfortable with the amount of control I have over how AI is used in my life
    - I would like more control over how AI is used in my life
    - Not sure

- In the past 12 months, have you encountered any of the following problems when using AI tools or services:
    - Received clearly incorrect or false information
    - Experienced discriminatory treatment or responses
    - Had personal information misused or exposed
    - Been unable to get help when an AI system made mistakes
    - Faced language barriers when trying to use AI services

- *Follow-up:* When AI systems make errors that affect you, how easy is it to:
    - Get the error corrected
    - Speak to a human for help
    - Understand why the error occurred
    - Prevent similar errors in the future

- On a scale of 1 to 5, where 1 is “not comfortable” and 5 is “very comfortable,” how comfortable are you with AI making decisions about:
    - Employment screening
    - Medical advice
    - Loan approvals
    - Education outcomes (such as grading student work)
    - Housing access and approvals

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- *Follow-up:* Have you ever experienced or suspected that an AI system made an unfair or biased decision about you or someone you know?
    - Yes, I have personally experienced this
    - Yes, I know someone who has experienced this
    - I Suspect this may have happened
    - No
    - Not sure

Understanding individual engagement with AI and concerns held by survey respondents can help policymakers understand gaps while providing direction for appropriate governance standards for emerging technologies.

Strong, Ethical and Privacy-Enhancing Data Governance Ensures Community Participation and Program Success

We recognize that effective digital inclusion policy depends on data collection that captures use patterns, barriers, and outcomes across all communities. Such data enable evidence-based policies and targeted, cost-effective interventions. However, surveys like NTIA's, which collect sensitive demographic and usage data, require privacy protections to maintain public trust and ensure broad community participation.

We urge NTIA to adopt clear and narrow limitations on data use:

- Data should be used solely for statistical and programmatic purposes (the express and intended purpose of this survey), not for any other purpose, including law or immigration enforcement.
- Bulk or aggregate data must not be used to disadvantage communities based on race, language, geography, or immigration status.

Without basic safeguards, fear of data misuse will prevent participation in programs designed to expand digital access and economic opportunity.

Comprehensive Survey Data Will Drive Targeted Interventions and Maximize Federal Technology Investment Returns

An updated 2025 Internet Use Survey represents a critical opportunity to generate evidence-based insights that inform smart policies driving both economic growth and principles of universal service and adoption. Without detailed survey data on usage patterns, barriers, and outcomes across regions and communities, future digital inclusion programs risk repeating the policy gaps that continue to leave millions of Americans shut out from the digital economy.

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NTIA's enhanced data collection could provide the evidence base needed to design sustainable, targeted interventions that ensure every household—regardless of income, location, or language—can engage in the modern economy. This is both a civil rights priority and a matter of national competitiveness, and long-term community and economic resilience.

For questions or further discussion, please contact Claudia Ruiz, Senior Civil Rights Policy Advisor at **cruiz@unidosus.org** and Johanna Lara, Programs Specialist at **jlara@unidosus.org**.

Sincerely,

UnidosUS

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Hispanic Federation

Hispanic Technology & Telecommunications Partnership, HTTP

Japanese American Citizens League

The Leadership Conference on Civil and Human Rights

National Action Network

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