January 11th, 2024

Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street, NE.
Washington, DC 20554

RE: Affordable Connectivity Program Outreach Grantees and Wind-Down

Chairwoman Rosenworcel,

Since the Commission established the ACP Outreach Grant Programs (National Competitive Outreach Grant Program, Tribal Competitive Outreach Grant Program, Your Home, Your Internet Pilot Program, and the ACP Navigator Pilot Program), the National Digital Inclusion Alliance (NDIA), Benton Institute, Next Century Cities (NCC), Common Sense, National Consumer Law Center (NCLC), on behalf of its low-income clients, and the United Church of Christ Media Justice Ministry have supported the grantees in their efforts to raise awareness about the Affordable Connectivity Program (ACP), guide households through the application process, and serve as ongoing consumer advocates after enrollment. Now, with the possibility that the ACP may end, the work of outreach grantees remains as important as ever.

The FCC has the legal authority to enlist Outreach Grant Program grantees to help facilitate an orderly implementation of the wind-down of the ACP program and, to the extent possible, mitigate the impact of the end of ACP.

We, therefore, urge the Commission to clarify that eligible outreach and awareness activities **include** raising awareness about the potential end of the ACP, conducting outreach to support enrollees during a wind-down phase as households transition off the program, and identifying for the Commission of any instances of consumer harms experienced by ACP enrollees during the transition off of ACP.

The Second Report and Order gives the Commission flexibility regarding eligible activities for grantees. The Commission established the Outreach Grant Program, in part, to reduce the digital divide in line with the Commission's overall strategic goals and objectives that support bringing affordable broadband to low-income households, increasing broadband adoption and access, and the strategic objective of communicating information about FCC programs and policies to help increase adoption of affordable broadband.[1]

The Commission wisely gave outreach grantees great flexibility in their efforts to close the digital divide: "Given the broad range of expenses that could be necessary and reasonable to

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[1] Second Report and Order at ¶ 11 and 15.

provide meaningful, effective outreach to eligible households, we decline to prescribe in this Order a comprehensive list of allowable outreach expenses, but reiterate that all outreach expenses funded through this grant program must be necessary and reasonable for the performance of the award.[2]"

As over 22 million households are currently beneficiaries of the program, an orderly wind-down of this size and scope requires the Outreach grantee's support to the households they assisted in enrolling. As such, the ability of the Outreach grantees to help ACP enrollees navigate the transition is critical and should be supported.

The Commission should instruct ACP Outreach Grantees to redirect their work toward raising awareness about the potential end of the ACP, the steps needed to transition off the program, and support ACP enrollees to avoid consumer harms during the transition off of the program and report instances of harm to the Commission. Without the ability to reach impacted households, the Commission and grantees risk losing the trust of those they enrolled in the program, which undermines the successful implementation of future broadband benefit programs the Commission and other agencies may administer.

Respectfully submitted,

Angela Siefer
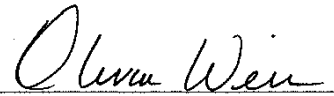Executive Director
National Digital Inclusion Alliance

Cheryl A. Leanza
Policy Advisor
United Church of Christ Media Justice Ministry

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[2] Ibid ¶ 26.

Andy Stutzman
Executive Director
Next Century Cities

Olivia Wein
Senior Attorney
National Consumer Law Center

Amina Fazlullah
Head of Tech Policy Advocacy
Common Sense

Drew Garner

Drew Garner
Director of Policy Engagement
Benton Institute for Broadband & Society