

August 31, 2015

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WC Docket No. 11-42

Dear Chairman Wheeler and Commissioners:

OCA – Asian Pacific American Advocates, a national membership-driven organization of community advocates dedicated to advancing the social, political, and economic well-being of Asian Pacific Americans (APAs), respectfully submits our comments in response to the Commission's Second Further Notice of Proposed Rulemaking.¹ We believe that the Lifeline program is essential to connecting low-income APA and other minority households to all facets of everyday life. Expanding the program to include modern, advanced communications networks and services is necessary to bridge the digital divide but also ensure that every household has equal and equitable access to the internet, a now universal need to access the pertinent realities of everyday life. Our comments build upon some of the principles included in the Leadership Conference's "Lifeline Principles Letter"², specifically the needs of the APA community, of which OCA was a signatory.

OCA - Asian Pacific American Advocates is a national membership-driven organization of community advocates dedicated to advancing the social, political, and economic well-being of Asian Pacific Americans. We represent over 100 chapters and affiliates throughout the continental United States, and through our chapters, provide culturally relevant trainings and programs on various policy and professional issues; multilingual support and direct services; and advocacy. In technology and telecommunications, OCA supports policies that increase access to broadband and other communications networks and services for APA communities³.

Lifeline and Low-Income Asian Pacific American Households

¹ Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, WC Docket Nos. 11-42, 09-197, 10-90, FCC 15-71 (Rel. June 22, 2015) ("2015 NPRM").

² June Lifeline Principles Letter, WC Docket 11-42 (filed June 10, 2015).

³ Michael W. Kwan, *OCA Applauds Introduction of Lifeline Program Modernization Bill* (June 2, 2015). Retrieved from <http://www.ocanational.org/news/234567/OCA-Applauds-Introduction-of-Lifeline-Program-Modernization-Bill.htm>.

OCA endorses the recommendations outlined within the proposal around the inclusion of broadband within the Lifeline program.

As stated in the Leadership Conference's June "Lifeline Principles Letter," the adoption rate of broadband is only 47 percent for households with income below \$25,000.⁴ Though data through the Pew Research Center and other agencies have shown continuous high rates of adoption for Asian Americans, the data collected has been from overwhelmingly English proficient Asian Americans, Asian American centric without inclusive data of Pacific Islanders, or does not disaggregate APA data by major ethnic groups within the United States.⁵

APAs include over 50 ethnic groups and 100 languages. APA groups have immigrated to the United States since the 1800s for various reasons including, but not limited to STEM jobs, family reunification, and refugee resettlement. As such, the socioeconomic levels of our communities are diverse. The lack of disaggregated Asian Pacific American data, in particular, mask disparities between subethnic groups necessary to fully understand the actual state of broadband adoption within the APA community. APA communities encompass some of the highest and lowest rates of poverty and highest and lowest rates of academic achievement among all ethnic groups in the United States⁶. Oftentimes, aggregated data will lump information regarding recent refugees, such as the Burmese and Karen, with more affluent and well-established Taiwanese and Japanese American datasets. Recent migrants, among those in greatest need of assistance, are statistically hidden by higher achieving second, third and fourth generation APAs.

Additionally, the data available for Asian Americans also misrepresent the poverty that well-established Asian American ethnic groups face, many of whom are first generation immigrants. According to a report by the National Coalition for Asian Pacific American Community Development (National CAPACD), almost 2 million APAs live at or below the poverty line the United States⁷. And though Southeast Asian and Pacific Islander Americans have some of the highest rates of poverty among all racial and ethnic groups in the United States⁸, Chinese and Indian Americans have the highest absolute number of individuals living in poverty at 449,356 and 246,399 respectively⁹.

The November 2011 National Telecommunications and Information Administration (NTIA) report on computer and internet usage at home states that Asian households exhibited the highest rates of home computer ownership (86 percent) and broadband service (81 percent). However, in

⁴ June Lifeline Principles Letter.

⁵ Pew Research Center, *Asian-Americans and Technology*. Retrieved from <http://www.pewinternet.org/2011/01/06/asian-americans-and-technology/>.

⁶ A Community of Contrasts, Asian Americans in the United States: 2011, Asian Americans Advancing Justice.

⁷ National Coalition of Asian Pacific American Community Development (June 2013). *Spotlight: Asian American and Pacific Islander Poverty*. Retrieved from http://nationalcapacd.org/sites/default/files/u12/aapi_poverty_report-web_compressed.pdf.

⁸ Asian American Center for Advancing Justice (2011). *A Community of Contrasts: Asian Americans in the United States*. Retrieved from http://www.advancingjustice.org/sites/default/files/Community_of_Contrast.pdf.

⁹ Id. at 8.

the same report, the NTIA also write that “Lower income families, people with less education....generally lagged the national average in both broadband adoption and computer use.”¹⁰ Given that both income and education level are indicators of broadband adoption, lumping all APA data ignores the disparities and lack of access to modern, advanced communications networks and services. As indicated in the Asian Americans Advancing Justice | AAJC comments to the FCC, the modernization of the Lifeline program would decrease the education gap within more disadvantaged Asian American ethnic groups and also decrease health disparities by providing quick access to online patient medical care records.¹¹

Lifeline has proven itself to be a critical service to low-income communities. Given the vastly differing demographics of the Asian Pacific American community, expanding the service to include broadband would increase the utility of the program for these families and provide access to the internet, critical to meeting the everyday needs of life in 21st Century America.

Office Closures and Movement of Applications Online

Ensuring that low-income APA communities can access broadband is no longer just a necessity for employment or ending the homework gap, but also increasingly important for ensuring compliance with federal and state laws and regulations and the ability to obtain government documents for federal and state benefits.

Access to quality internet access becomes critical as necessary government services begin to move online. In 2013, new laws required that Social Security Income beneficiaries establish electronic payments in place of traditional checks¹², along with field office closures, cut-backs in staff hours, and an increased effort to push traditional paper applications online¹³ become unnecessary barriers¹⁴ to SSA services when community members are limited English proficient and do not have access to internet services.

Additionally, the faster movement of services through online applications and updates has made internet a necessity for many APA individuals who receive government services. With regards to immigration status, legal permanent residents and undocumented immigrants currently in the process of applying for Deferred Action for Childhood Arrivals (DACA)¹⁵ can more quickly access the status of their applications online than through navigation of the United States Citizenship and Immigration Services telephone line or through an in-person meeting.

¹⁰ NTIA, *Exploring the Digital National Computer and Internet Use At Home* (November 2011).

¹¹ Asian Americans Advancing Justice | AAJC, *Comments in Support of Restructuring the Lifeline Program to Include Broadband Subsidies for Low-Income, Asian American and Pacific Islander Communities*; WC Docket No. 11-42. Retrieved from

http://www.advancingequality.org/sites/aajc/files/AAJC_LifelineCommentsFinal%288%2031%2015%29.pdf.

¹² Social Security Administration. Retrieved from <http://www.ssa.gov/deposit/>.

¹³ *Hours cut at Social Security offices in King County* Seattle Times. Retrieved from <http://blogs.seattletimes.com/today/2012/11/hours-cut-at-social-security-offices-in-king-county/>.

¹⁴ CBSDC, *Social Security Offices Closing, Baby Boomers Forced Online For Help*. Retrieved from <http://washington.cbslocal.com/2014/06/18/social-security-offices-closing-baby-boomers-forced-online-for-help/>.

¹⁵ USCIS. Retrieved from <http://www.uscis.gov/i-90>.

Given that 57 percent of all Asian Americans in the United States have not naturalized and over 1.3 million Asian Americans are undocumented, with thousands eligible for DACA¹⁶, access to online services are necessary for our communities to ensure the successful completion of their applications and other important services more accessible online. The FCC's proposal to expand Lifeline to also include the option for broadband is pivotal to the continued usage of government services and compliance within APA communities.

Lastly, including broadband services as an option to Lifeline serves the national interest. Both public and commercial services are increasingly accessible primarily through internet services. This move to electronic access to services reduce the cost of providing the services through decreased staffing, document handling and redundant data entry while increasing service penetration into the target populations. The savings realized could offset part of the cost of including broadband access to Lifeline.

Conclusion

We respectfully offer these recommendations and urge the Commission to act swiftly to include broadband in the Lifeline program. Without modern, high quality broadband through the Lifeline service, many Asian Pacific American families and households will continue to face barriers to their educational achievement, employment opportunities, and even their capacity to engage federal, state and local government agencies in pertinent programming. Through modernization of the program, the FCC can improve the quality of life of low-income APAs. Please contact OCA Policy and Communications Manager, Kham See Moua, at (202) 223-5500 x115, if you would like to discuss these recommendations or any other issues of importance to OCA.

Sincerely,



Michael W. Kwan
OCA National President

¹⁶ Id. at 9.