



February 4, 2022

The Software and Information Industry Association (SIIA) appreciates the opportunity to offer comments in relation to grant programs authorized under the Infrastructure Investments and Jobs Act to fund expanding broadband in communities across the United States. We urge NTIA to consider the importance of broadband access to America's learners and how access can decrease the homework gap, increase levels of academic performance, and finally close the digital divide.

SIIA is the principal trade association for the software information and digital content industry, representing a diverse group of over 450 companies. A number of our member companies provide critical educational services and technology for students at all levels. Specifically, our education technology members work to support teachers, provide online and hybrid instruction environments, improve student learning, provide valuable education-related services, and increase awareness surrounding the importance of data privacy.

SIIA applauds NTIA for collecting input on how to better reach internet users nationwide and provide broadband access. Broadband capabilities are essential in today's learning environment. Students and parents leverage tools to access education resources from home via the internet every day, and educators use these tools to connect with their students. The pandemic exacerbated the realities of subpar access and showcased countless examples of students without adequate access finding wherever they could—small coffee shops, restaurant parking lots, and gyms—to access the internet at appropriate speed levels to participate in class and complete daily homework tasks. This included having to travel in heatwaves and other extreme weather and withstanding those conditions until all assignments were complete. This was, and still is a reality for many students and if left unaddressed, will continue to widen the homework gap¹ for those from under-resourced communities² in urban, suburban, and rural areas³. Educators, who face significant challenges getting connected to broadband and lack adequate support to provide high-quality online and hybrid teaching experiences, remain left behind and many times unacknowledged in the discussion of the digital divide. The new programs established by the Digital Equity Act could remedy the low levels of student and teacher adequate access to the

¹ <https://www.fcc.gov/about-fcc/fcc-initiatives/homework-gap-and-connectivity-divide>

² [FCC broadband report ignores affordability issue - National Digital Inclusion Alliance](#)

³ [Limiting Broadband Investment to "Rural Only" Discriminates Against Black Americans and other Communities of Color - National Digital Inclusion Alliance](#)



internet. With the allocated funds, states can establish plans that address specific community needs, as well as create new initiatives that respond to how they change. We urge NTIA to consider the needs of those teachers and students when allocating competitive grants. Additionally, expanding access to broadband in underserved communities would significantly remove undue barriers and provide students with the flexibility to complete assignments at home, enable teachers to take advantage of opportunities to access and deliver online learning, and reduce factors contributing to the current levels of the homework gap.

Inadequate broadband access not only creates physical hurdles that students and educators must overcome, but also presents other academic challenges that can have lasting impacts on academic success. According to findings from the Consortium for School Networking's (CoSN) Home Internet Connectivity study, 92% of students connect to the internet via wi-fi for virtual lessons.⁴ With the vast majority of students relying on wi-fi to connect to their teachers and classmates, network bandwidth is important as low levels can impact the tools they are able to access such as online tutoring and other resources to support them academically. Consistent lack or extremely slow access to necessary support materials can have a compounding effect over the course of a student's academic career. Expanding broadband access will help prevent this and allow more students to reach their academic potential.

New momentum created by the passage of the Infrastructure Investment and Jobs Act (Pub.L. 117–58) lays the ground for additional support and resources that can bridge the digital divide for at-risk and marginalized communities, while adding more resources to support them with digital media, literacy, and privacy training. Organizations like the [National Digital Inclusion Alliance \(NDIA\)](#) have worked to further policy, funding and community-based digital inclusion programs, and digital skills training pathways through public-private partnerships. As noted by NDIA, while broadband deployment is one inroad to closing the digital divide, it is not the only solution. It is essential to invest in digital equity programs that include a combination of low-cost broadband, affordable wi-fi-enabled technology, digital skills training, literacy to use the technology, and privacy training to support at-risk and marginalized communities. The tools for successful technology adoption and use are equally as essential as access to affordable broadband. A concrete element of these community programs needs to be training on data privacy best practices that are in plain language (and adapted to a variety of languages), which can support the most vulnerable populations with access to resources, guides, and instructions on how to safeguard their data.

⁴ <https://www.cosn.org/edtech-topics/digital-equity/>



We thank you for this opportunity to provide comments on increasing access to broadband to all Americans. Should you have any questions, please contact Victoria Akosile at vakosile@siaa.net.