April 2, 2015

Jennifer Jessup, Departmental Paperwork Clearance Officer
Department of Commerce
Room 6612
14th Street and Constitution Avenue NW
Washington, DC 20230

RE: Internet Use Supplement to the Census Bureau's Current Population Survey Comment Request

Dear Ms. Jessup,

On behalf of the Information Technology and Innovation Foundation (ITIF), we are pleased to submit these comments in response to the Computer and Internet Use Supplement for the Census Bureau's July 2015 Current Population Survey (CPS) designed to gather reliable data on broadband use by U.S. households.[1] ITIF is a nonprofit, non-partisan think tank committed to articulating and advancing a pro-productivity, pro-innovation, and pro-technology public policy agenda internationally, in Washington, and in the states. Through its research, policy proposals, and commentary, ITIF is working to advance and support public policies that boost innovation, digital transformation, and productivity.

ITIF applauds the Department of Commerce for broadening the scope of the U.S. Census Bureau's CPS to include questions on Internet and computer use, especially in emerging technology areas such as the Internet of Things, wearables, and remote health monitoring. The Internet economy contributes to 3.4 percent of GDP in most large nations, and better information about how consumers and businesses use the Internet can help policymakers better promote adoption and use of these technologies and pursue President Obama's goal of universal and affordable broadband access for all Americans.[2] However, there are still a number of key changes that can be made to the proposed survey questions to improve the quality, utility and clarity of the information to be collected.

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[1] "Proposed Information Collection; Comment Request; Computer and Internet Use Supplement to the Census Bureau's Current Population Survey," *Federal Register*, Vol. 80, No. 23, February 4, 2015, 6056-6057, https://federalregister.gov/a/2015-02087.

[2] James Manyika and Charles Roxburgh, *The Great Transformer: The Impact of the Internet on Economic Growth and Prosperity* (New York: McKinsey Global Institute, 2011).

Additional Questions for CPS

Technologies like broadband allow consumers to take on the role of producers in the economy and share in the delivery of a service.[3] To better understand the true economic impact of broadband deployment and access, including the increased productivity that comes from citizens using e-government services, policymakers need to better understand individuals' activities online. ITIF recommends adding questions after the ECOMME question to provide more information on the subject.[4] ITIF suggests adding questions similar to the following:

- During the past year, how much money [have you/has any member of your household] spent on goods or services that you have ordered online? *This question could be answered on a multiple-choice scale where answers are numerical dollar amounts (e.g., Less than $100, Between $100 - $500, etc.).*
- How much of the above was spent on physical goods that were delivered to your household? How much of the above was spent on online services? *These questions could be multiple-choice and percentage based, between 0 and 100 percent.*
- How often during the past year [have you/has any member of your household] used websites in which you rate consumer goods or services? Examples include Yelp, TripAdvisor, and HealthGrades.
- How often during the past year [have you/has any member of your household] used an online government service? Examples include paying your taxes online, renewing a driver's license online, or applying for government benefits.

In addition to the above questions about e-commerce, ITIF suggests adding additional questions to the survey regarding consumer activities that will measure important inhibitors of the Internet economy. Specifically, ITIF recommends adding questions on the use of ad-blocking software (which reduces ad-based revenue for website operators) and intellectual property theft (which reduces the revenue of both legal content platforms and the content creators). ITIF suggests adding questions similar to the following:

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[3] Daniel Castro, Robert Atkinson, and Stephen Ezell, "Embracing the Self-Service Economy," *Information Technology and Innovation Foundation*, 2010, http://www.itif.org/files/2010-self-service-economy.pdf.
[4] ECOMME reads, "What about online shopping, travel reservations, or other consumer services? *(If needed)* [Do you/Does NAME] use online shopping, travel reservations, or other consumer services? [Yes/No]." See "Proposed Information Collection; Comment Request; Computer and Internet Use Supplement to the Census Bureau's Current Population Survey," *Federal Register*.

- How often during the past year [have you/has any member of your household] accessed movies, music, or other digital products or services from a website that you suspect were being distributed by someone without the legal right to do so?
- How often during the past year [have you/has any member of your household] used software to block online advertisements?

Finally, the survey should explore how households use mobile broadband and how this differs from fixed broadband. In the initial draft, the survey fails to draw a distinction between the services that respondents access on mobile broadband compared to the services they access on fixed broadband. Instead, for respondents who indicate their households use mobile broadband, the survey should include a question that asks respondents what services they use on these differing services. Answers to this question should list online applications and services already mentioned in the activities section of the survey. ITIF suggests adding questions similar to the following:

- You said that [you/someone in this household/some members of this household] use[s] a mobile Internet service or data plan to go online. While using this service, what online activities do [you/he or she/they] participate in? *This question would allow respondents to select all answers that apply and answers would include the activities previously mentioned in the survey (e.g., online shopping, social networking, e-government, etc.)*
- You said that [you/someone in this household/some members of this household] use[s] a fixed Internet service such as Cable, DSL, or fiber to go online. While using this service, what online activities do [you/he or she/they] participate in? *This question would have the same answer scheme as above.*

By including these questions, the survey will add clarity to how respondents use different applications on differing types of broadband. This data set will then provide additional utility for policymakers making decisions on issues involving fixed versus mobile broadband.

Suggested Changes to Proposed Questions
There are a number of changes to the proposed questions that should be made to improve their clarity and usefulness. First, the proposed privacy questions will not help policymakers make better decisions or aid critical analysis. As currently worded, the question PSPRE, will likely elicit unhelpful responses because there

is no attempt to differentiate between significant and insignificant privacy and security concerns.[5] Privacy concerns will inevitably affect what people do and say online because people are sensitive to what other people can learn about them. For example, many people will be sensitive to posting controversial political views or compromising personal photos because of how employers may react to this information. Therefore, as it is currently worded, PSPRE will likely elicit answers that overinflate privacy and security concerns.[6] A better way to structure this question would be to ask to what extent privacy concerns significantly impact respondent's daily lives. We suggest rewording PSPRE to say the following:

- (PSPRE) Have privacy or security concerns substantially impeded [your/anyone in this household's] ability to do any of these activities online?

Likewise, the PSCON question uses vague language and fails to put the respondent's concerns about privacy and security in context and assess their relative importance.[7] A better approach would be to assess how privacy and security concerns rank relative to other consumer concerns that policymakers may wish to address. At a minimum, the response should allow respondents to differentiate between items of high and low concern. Therefore, if a respondent is only slightly concerned about threats to personal safety but very concerned about government tracking, he or she can make this distinction. A more ideal solution would be to ask respondents about Internet concerns overall, rather than limiting the question to concerns about privacy and security, so respondents can discuss affordability, ease of use, or other issues that may be important to them, and then rank those concerns.

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[5] PSPRE reads, "During the past year, have concerns about privacy or security stopped [you/anyone in this household] from doing any of these activities online: [Conducting financial transactions such as banking, investing, or paying bills online?/Buying goods or services online?/Posting photos, status updates, or other information on social networks?/ Expressing an opinion on a controversial or political issue on a blog or social network, or in a forum, email or any other venue?]." See "Proposed Information Collection; Comment Request; Computer and Internet Use Supplement to the Census Bureau's Current Population Survey," *Federal Register*.

[6] Ibid.

[7] PSCON reads, "Overall, what concerns [you/members of your household] the most when it comes to online privacy and security risks? [Identity theft/Credit card or banking fraud/Data collection or tracking by online services/Data collection or tracking by government/Loss of control over personal data such as email or social network profiles/Threats to personal safety, such as online harassment, stalking, or cyber-bullying/No concerns/Other]." See "Proposed Information Collection; Comment Request; Computer and Internet Use Supplement to the Census Bureau's Current Population Survey," *Federal Register*.

Finally, the survey offers many questions on different apps and services that people use on the Internet, including watching videos, using financial services, online shopping, and on-the-go services. In the previous section, we suggested adding e-government services, ad-blocking services, and rating services. Rather than quantifying these questions with a simple "Yes/No" answer, a better alternative would be to use a ranking system, such as by asking how often respondents use each service. Each of these questions could include "If yes, how often?" followed by a set of multiple-choice options where answers indicate frequency. These multiple-choice answers could be ranked "Every Day," "Several Times a Week," "Several Times a Month," "Less Than Once a Month," and "Never." This ranking system will not only provide better quality information, it would add clarity and specificity to the survey.

Conclusion

The Census Bureau has an opportunity to substantially advance the discussion about the current state of adoption and use of the Internet and related technologies. The adjustments to the survey recommended in this letter will enhance the quality and provide additional clarity and utility from the information collected by the survey.

Sincerely,

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The Information Technology and Innovation Foundation