ITIF | INFORMATION TECHNOLOGY & INNOVATION FOUNDATION

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COMMENTS OF ITIF

Before the

National Telecommunications and Information Administration

Washington, D.C. 20230

In the Matter of:

Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; NTIA Internet Use Survey

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INTRODUCTION AND SUMMARY

The Information Technology and Innovation Foundation (ITIF) appreciates this opportunity to comment on the National Telecommunications and Information Administration's (NTIA's) request for comment on the ongoing Internet Use Survey.[1] Closing the digital divide is integral to harnessing the benefits of technology, and the offline population suffers increasing harms the further behind the technological curve it falls. Since households that are still offline are, by definition, unable to be reached through standard methods, flexible, data-driven approaches that target solutions to remaining barriers to connectivity are key to closing the digital divide. In that sense, NTIA's Internet Use Survey is one of the single most important resources for digital inclusion, because it is a comprehensive, authoritative source of data that can point digital equity and inclusion programs toward their best use. It remains an invaluable addition to the U.S. Census Bureau's Current Population Survey and should continue to be included as long as society uses the Internet.

ITIF also commends NTIA for its proposed updates to the survey, particularly the new suggested responses on reasons for non-adoption under the subsection "Households without any home Internet users."[2] As the technological and societal landscape changes, so too do the reasons households remain offline. NTIA's new

[1] Founded in 2006, ITIF is an independent 501(c)(3) nonprofit, nonpartisan research and educational institute—a think tank. Its mission is to formulate, evaluate, and promote policy solutions that accelerate innovation and boost productivity to spur growth, opportunity, and progress.

[2] National Telecommunications and Information Administration (NTIA), "2023 Internet Use Survey Information Collection," Request for Comment, accessed July 2023, https://www.ntia.gov/federal-register-notice/2023/2023-internet-use-survey-information-collection.

suggested responses—which provide respondents the additional options of personal safety concerns, that they believe an Internet subscription is "not worth the cost," and that their household is or has recently moved—capture important additional facets of the offline population's motivations.[3] ITIF would also like to suggest some additions to this or to upcoming survey iterations that we believe would help expand our understanding of the offline population.

SUGGESTED ADDITIONAL QUESTIONS

ITIF has previously recommended that NTIA expand the possible responses it offers as the main reason a household remains offline, which until now have included 1) Internet service is too expensive, 2) lack of available infrastructure, 3) can use the Internet elsewhere, 4) no adequate computer, 5) privacy or security concerns, and 6) no need or interest.[4] In particular, ITIF has argued that those responding "No interest" are being lumped into too broad a category that obscures paths toward ensuring individuals can make informed choices about their connectivity. Delving more deeply into the motivating factors behind that lack of interest may well reveal barriers to Internet use that could be overcome with the right policy approach.[5]

Gather More Information on Awareness of and Reaction to Subsidy Programs

First, we suggest that NTIA add some follow-up questions to those who cite inability to afford the cost as the major barrier to adoption, such as:

1) Does your household know about the Affordable Connectivity Program (ACP)?
2) Have you signed up for it? If not, why?

[3] NTIA, "November 2023 NTIA Internet Use Survey: Draft for Public Comment," accessed July 2023, 11, https://www.ntia.gov/sites/default/files/publications/2023-ntia-internet-use-survey-public-comment.pdf.

[4] NTIA, "Digital Nation Data Explorer," Non-Use of the Internet at Home, updated October 5, 2022, https://www.ntia.gov/other-publication/2022/digital-nation-data-explorer#sel=homeEverOnline&demo=&pc=prop&disp=chart.

[5] Jessica Dine, "The Digital Inclusion Outlook: What It Looks Like and Where It's Lacking" (ITIF, May 2023), https://itif.org/publications/2023/05/01/the-digital-inclusion-outlook-what-it-looks-like-and-where-its-lacking/.

This specific question is contingent on the continued funding of the ACP (which ITIF also heartily supports), but NTIA could also ask more generally about broadband affordability programs. For the nearly one in five offline respondents who cite price as their major concern, defraying the cost of broadband is a key component of getting them online. Nevertheless, previous studies have found that awareness of the ACP is lagging, and even more households face problems enrolling.[6] Asking follow-up questions like these would help weed out those who are unaware of subsidy programs and those with some barrier to signing up, both of which can be addressed with the proper—but different—policies.

Go Into Detail on Those Who Cite Lack of Interest

Second, for the offline respondents citing lack of interest, ability to use the Internet elsewhere, or say it isn't worth the cost, we suggest these follow-ups:

1) Have you at any point in the last year been disadvantaged by not having access to an Internet connection at home (e.g., did you face a significant commute to a library when you needed to print an online form or document, or were you unable to work from home at a time when it otherwise would have been possible and helpful, or did you go to an in-person doctor's appointment that could have been covered as effectively over telehealth)?
2) Is there anything you can think of that would have to change for you to become interested in getting the Internet at home?
    a. For example, if you were offered free classes on how to use the Internet, would that make you interested?
    b. What if you had easy access to a resource to walk you through signing up for a free or low-cost plan?

[6] "No Home Left Offline: Accelerating Affordable Connectivity Program Adoption" Education Superhighway, October 2022, https://www.educationsuperhighway.org/wp-content/uploads/No-Home-Left-Offline_Accelerating-ACP-Adoption_2022.pdf.

The most effective digital inclusion efforts are targeted to specific needs, and the most accurate assessment of the offline population's needs comes directly from that population. Though at the local level, every population varies in the type of inclusion effort best suited for its needs, assembling a high-level understanding of the need for—for example—digital literacy classes vs. digital navigators will help inform policy and resource allocation. Similarly, figuring out areas where the offline population suffers the most harms will help target inclusion efforts and help tailor programs to the needs of specific populations. As more generalized barriers to connectivity disappear, we should expect the remaining causes of the digital divide to be more granular and specific to individuals, and our data should attempt to capture those reasons.

Solicit More Detail on the Need for Digital Literacy and Other Inclusion Efforts

Third, digital literacy has become a major part of digital inclusion efforts. Though a broad range of responses—including those citing privacy or security concerns and even lack of interest—suggest a need for some digital training, it may be helpful to introduce an additional broad category of response:

1) I don't know how to use the Internet.

Potential follow-up options among which respondents could choose could be helpful here as well in directing digital inclusion efforts to existing needs:

1) I would consider using the Internet if I had access to a class on how to use it.
2) I would consider using the Internet if someone I trust were available to help me with troubleshooting, to answer questions, and to help get me connected.

The burgeoning digital inclusion field suffers from a dearth of data on best practices and data on the efficacy of existing programs. Even more tractable digital literacy efforts are hamstrung by the fact that there is no one authoritative, comprehensive, up-to-date assessment of digital literacy in the United States. NTIA could go a long way in helping inform evidence-based policy by more closely mapping the current landscape.

DIGITAL INCLUSION HAS COME FAR BUT IS NOT DONE

A variety of surveys exist, in addition to NTIA's own analysis, that have identified trends among nonadopting households.[7] A key finding among them is that unsurprisingly, nonadoption often correlates with other socioeconomic factors like income and education level, which in turn correlate with demographic factors. Internet gains, in many cases, are stratified on the same lines along which some members of the population are disadvantaged in other ways as well. This is both a clear problem and indicative of systemic factors influencing those who remain offline. Compounding the tragedy is the fact that many of the people currently excluded from the Internet are those who would in some ways benefit most from it: If a major selling point of Internet access is cheaper, easier access to resources like education, healthcare and government services, a key population of interest should be those who are most resource-scarce, and most reliant on some of these institutions to begin with.

Evidence-based policy requires granular data to identify each individual reason that somebody remains offline so that policymakers can work to address that reason. Broadband policy should seek to ensure that the only people offline are those who have made the explicit, informed choice not to connect with no barriers standing in their way. Continuing and expanding the Internet Use Survey to enable a more in-depth assessment of this population is a vital step in achieving that goal.

Thank you for your consideration.

Jessica Dine
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[7] Andrew Perrin, "Mobile Technology and Home Broadband 2021" (Pew Research Center, June 2021), https://www.pewresearch.org/internet/2021/06/03/mobile-technology-and-home-broadband-2021/; "DIGITAL SKILLS AND TRUST" (EveryoneON and John B. Horrigan, PhD, February 2022), https://static1.squarespace.com/static/5aa8af1fc3c16a54bcbb0415/t/61fc71248a56247e899c2a20/1643933997111/EveryoneOn_Report_2_DigitalSkills_and_Trust.pdf; Michelle Cao and Rafi Goldberg, "Switched Off: Why Are One in Five U.S. Households Not Online?" NTIA Data Central, 2022, https://www.ntia.gov/blog/2022/switched-why-are-one-five-us-households-not-online.