ITIF | INFORMATION TECHNOLOGY & INNOVATION FOUNDATION

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# COMMENTS OF ITIF

to the

National Telecommunications and Information Administration

Washington, D.C.

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| In the Matter of: | ) | |
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| 2027 Internet Use Survey Information Collection | ) | FR Doc. 2026-18303 |
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November 9, 2026

## INTRODUCTION AND SUMMARY

The Information Technology and Innovation Foundation (ITIF) appreciates the opportunity to comment on the 2027 Internet Use Survey Information Collection.[1] The Internet Use Survey is a critical tool for policymaking. It is the best source of data on why those on the wrong side of the digital divide are not connected. These data are the necessary centerpiece of any evidence-based broadband policy. We cannot close the digital divide without identifying its causes and tailoring policy interventions to prioritize its largest causes and wind down policies that address issues that are no longer substantial problems. Therefore, NTIA should seek to tailor and deepen the survey's ability to track the causes of the digital divide and define the characteristics of broadband that bridges that divide.

## THE INTERNET USE SURVEY SHOULD CONTINUE TO ASK THE RELEVANT QUESTIONS TO ASSESS THE DIGITAL DIVIDE

The most important questions in the survey are "What are the reasons why [you/members of your household] do not use the Internet at home?" and "Of the reasons you just listed for not going online at home, which [do you/does your household] consider to be the most important?" NTIA should maintain and perhaps expand these questions because they are the central questions to identify the causes of the digital divide. Without knowing why Americans are not connected to the Internet, policymakers cannot craft evidence-based policies to connect those who want broadband.

The survey now includes a wide range of reasons for non-adoption, but it lacks an option that clearly captures a skills gap. By adding an option of "don't know how to use it" or "too complicated," the survey can capture instances in which a lack of digital skills is a driver of the digital divide. If this option garners many responses, policymakers would be able to shift resources to developing these skills. If not, then perhaps even existing digital skills programs should be scaled back.

## THE SURVEY SHOULD SEEK TO IDENTIFY REAL SPEED NEEDS

A major question in broadband policy is what level of throughput and latency households need versus what ISPs using various technologies can deliver. If many Americans are routinely using applications that create network demands that exceed certain technologies' capabilities, then consumers without, say, a fiber connection would be on the wrong side of the digital divide. If, on the other hand, consumers' real throughput and latency needs are well within the capabilities of fiber, fixed wireless, low-Earth orbit satellite, and coaxial cable, then the digital divide would look very different. In the first case, there would be reason to fund more fiber networks. In the second case, universal deployment is already a practical reality, and digital divide policy should shift its priorities accordingly. Performance needs will likely change over time, so adding

[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. ITIF's goal is to provide policymakers around the world with high-quality information, analysis, and recommendations they can trust. To that end, ITIF adheres to a high standard of research integrity with an internal code of ethics grounded in analytical rigor, policy pragmatism, and independence from external direction or bias. For more, see: "About ITIF: A Champion for Innovation," https://itif.org/about; "2027 Internet Use Survey Information Collection," NTIA, September 8, 2026, https://www.ntia.gov/federal-register-notice/2026/2027-internet-use-survey-information-collection.

questions to evaluate current needs will enable policymakers to track how broadband networks are adjusting to changes in consumer behavior.

Some follow-ups or changes to existing questions could better shed light on these issues. The survey could seek to assess network performance by all technologies by asking respondents the name of their ISP, which would allow policymakers to determine which technologies are likely serving the respondent's household rather than relying on respondents to accurately characterize their technology. The survey should ask a follow-up to those who answer "no" to the question of whether their connection meets their needs: "For which services or applications is it too slow?" This question would help identify real bandwidth constraints and also suggest whether ISP performance or some other issue is the main bottleneck for consumers: if consumers report their service as too slow for even light use, that may suggest causes such as poor home network configuration, rather than a failure of their ISP.

Furthermore, since increased throughput comes at a cost, the survey should combine any question about faster speeds with a follow-up about the respondent's willingness to pay for them.

## THE SURVEY SHOULD SEEK BASIC INFORMATION ABOUT CONSUMER HOME NETWORK CONFIGURATION

Given the capabilities of today's broadband networks, it is likely that consumers' home Wi-Fi networks are more of a bottleneck than the ISP's throughput delivered to the dwelling. A gigabit fiber-to-the-home connection will feel slow to a consumer in a densely populated area connected to a 2.4 GHz Wi-Fi signal broadcast from a router that is in a closet on the far side of their house.

Admittedly, this barrier to adequate connectivity is difficult to ask about since consumers who lack the technical sophistication to optimize their home network also likely lack the skills to describe that fact to the surveyor. But some questions could suggest whether the home network is a source of problems. The survey could ask those who say their Internet connection is sometimes too slow whether it is slow everywhere or worse in certain rooms of the dwelling. Or it could ask if the respondent knows where in the home their router is to capture the level of consumer knowledge about the relevance of router placement. These responses would both help policymakers discern possible explanations for a lack of effective connectivity and inform ISPs about avenues of education or service that could improve customer satisfaction.

## CONCLUSION

The Internet Use Survey is a key tool to enable evidence-based broadband policy. By continuing critical digital divide questions and tailoring the survey to changes in broadband technologies and markets, this tool will provide the foundation to update broadband policies to better serve consumers.

Thank you for your consideration.

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