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Broadband Technology Opportunities Program
U.S. Department of Commerce
1401 Constitution Avenue, NW, Room 4812
Washington, DC 20230

Re: Broadband Technology Opportunities Program – Joint Request for Information; Docket No. 090309298-9299-01

To Whom It May Concern:

The Broadband Technology Opportunities Program (BTOP) will be a significant step toward closing the digital divide in education and economics, and bringing valuable resources and opportunities to all our children, in every community. But it can't be just wiring and hardware. Broadband investment – through BTOP and the Rural Utilities Service – won't bring the rewards we need unless it includes comprehensive digital media literacy programs for America's kids and schools. That is why Congress listed among the purposes of the BTOP the importance of providing education, awareness, training and support to schools, libraries and other community organizations.

As we work to bring the economic and educational benefits of broadband to every home, school and neighborhood in the United States, we must also ensure that parents and educators are prepared to help children learn how to navigate the digital media world, including how to find age-appropriate and educational media, and how best to avoid dangers online. If we invest wisely in the digital media literacy and education that need to accompany broadband, we will create new jobs, encourage demand for broadband service, and prepare our children for the high tech jobs of the future.

To facilitate this investment, we propose two alternative strategies for funding education, awareness, and training within the broadband programs:

1. Give priority funding to broadband grant applications that dedicate at least 5-10 percent of the funds to partnering with a qualified non-profit organization to provide digital media literacy programs in schools and community programs in the area served.
2. Reserve a portion of the available funds for grants to non-profit organizations to partner with elementary schools, secondary schools, and other educational entities and community organizations to provide digital media literacy programs, including professional development and in-service training for educators, technology support and staff development, and curriculum development and dissemination.

Innovative digital media literacy tools are already being used in many independent schools, and in some public school districts with appropriate staff support. They are the key to a successful 21st century classroom and to improving student achievement. Common Sense Media and other organizations have developed digital media literacy curriculum materials. To serve the public interest, and make the most of our investment in broadband, we must bring these resources – and the necessary support – to schools and community programs all over the United States, especially in rural and urban underserved areas.

We appreciate your consideration of these comments and invite you and your staff to contact us with any questions.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jim", with a horizontal line above it.

James P. Steyer
Founder and CEO

Comments of Common Sense Media

**Re: Broadband Technology Opportunities Program – Joint Request for Information
Docket No. 090309298-9299-01**

Common Sense Media makes the following comments in response to the March 12, 2009 Department of Commerce and Department of Agriculture Joint Request for Information. These comments are intended to assist the National Telecommunications and Information Administration in establishing and administering the Broadband Technology Opportunities Program (BTOP) and the Rural Utilities Service (RUS) in implementing its expanded authority.

Invest in Education, Awareness and Training

Common Sense Media believes that a fundamental component of the BTOP/RUS efforts must be education in the smart and safe use of digital technology, through digital media literacy programs. Investing wisely in both broadband access **and** education will increase supply of – and demand for – broadband, because digital media literacy programs build awareness of the benefits of broadband, the Internet, and digital technology, while also addressing parent and teacher concerns about the potential dangers. Including digital media literacy programs in the broadband investment will encourage broadband adoption, create new jobs, and prepare our children for the high tech jobs of the future.

To facilitate this investment, we propose two BTOP/RUS strategies for funding education, awareness, and training:

1. Give priority funding to broadband grant applications that dedicate at least 5-10 percent of the funds to partnering with a qualified non-profit organization to provide digital media literacy programs in schools and programs in the area served.
2. Reserve a portion of the available funds for grants to non-profit organizations to partner with elementary schools, secondary schools, and other educational entities and community organizations to provide digital media literacy programs, including professional development and in-service training for educators, technology support and staff development, and curriculum development and dissemination.

The BTOP and the expansion of RUS will be significant steps toward closing the digital divide in education and economics, and bringing valuable resources and opportunities to all our children and families, in every community. But they can't be just wiring and hardware. Broadband investment won't really bring the rewards we want unless we ensure that America's youth have the knowledge, skills, and ethics they need to harness the power and the potential of the digital world. That is why Congress listed among the purposes of the BTOP the importance of providing education, awareness, training and support to schools, libraries and other community organizations.¹

As we work to bring the benefits of broadband to every school and neighborhood in the United States, we must also ensure that parents and educators are prepared to help children learn how to navigate the digital media world, including how to find age-appropriate and educational media, and how best to avoid dangers online. This need is reflected in the recent changes to the E-Rate program, requiring schools receiving E-Rate funding to provide Internet safety education to students, though E-Rate funds cannot be used to provide that education.²

Strategy 1

In considering applications to provide new or improved access to broadband services, give priority funding to broadband grant applications that dedicate at least 5-10 percent of the funds to partnering with a qualified non-profit organization to provide digital media literacy programs in schools and community programs in the area served. Further consideration should be given to projects that identify the digital media literacy provider to be partnered with and demonstrate that a commitment has been made between the grantee and provider.

Define an eligible non-profit organization as “an eligible digital media literacy provider.” Define an eligible digital media literacy program provider as

“An eligible digital media literacy program provider is a nonprofit organization with demonstrated experience in providing digital media literacy education programs in

¹ Section 6001(b)(3) of the American Recovery and Reinvestment Act of 2009.

² See Public Law No: 110-385—OCT. 10, 2008: Title II, Sec. 215 – Promoting Online Safety in Schools.

elementary and secondary schools, and other educational entities appropriate to provide local programs to: (1) establish and support innovative digital media literacy education programs in elementary and secondary schools; (2) enhance the ongoing professional development and in-service training for new and current educators; and (3) support curriculum development and educational resources for teachers, students and parents.

“Essential components of digital media literacy are: (1) Basic Media and Technology Skills; (2) Research and Information Literacy; (3) Communication and Collaboration; (4) Creativity and Innovation; (5) New Media Literacy; and (6) Digital Citizenship.”

Define eligible costs associated with a digital media literacy program as

“Allowable costs associated with a digital media literacy program include personnel; employee benefits; computer hardware, software, and other end-user equipment; telecommunications services and related equipment; consultants, evaluators, and other contractual items; travel; professional development and in-service training for new and current educators; curriculum development and educational resources for teachers, students and parents; and supplies.”

Strategy 2

Reserve \$150-200 million of the available funds for grants to non-profit organizations to partner with elementary schools, secondary schools, and other educational entities and community organizations appropriate to provide local programs, to provide digital media literacy programs, including professional development and in-service training for educators, technology support and staff development, and curriculum development and dissemination.

Define an eligible non-profit organization as “an eligible digital media literacy provider.” Define an eligible digital media literacy program and provider as per the proposed definitions in Strategy 1 above.

Through either strategy, the establishment of innovative digital media literacy education programs in schools and communities in America will spur economic growth and job creation

through the hiring and professional development of technical and instructional support staff, professional development and in-service training for educators, and the development and dissemination of curriculum and educational resources for teachers, students and parents.

Digital Media Literacy Programs Encourage Demand for Broadband

Investing in broadband access will increase supply, while investing in digital media literacy and education will increase demand. Access is essential, but it should not be the sole focus. Already 92% of U.S. households have access to cable high speed Internet³ but only 57% of households choose to subscribe to the service.⁴ This translates into roughly 35 million households with access to broadband that do not currently use the services.⁵ The problem is not access to broadband, but perceived value and relevance.

According to the Pew Internet & American Life Project's *Home Broadband Adoption 2008* study, roughly one-quarter (27%) of adult Americans are not Internet users. While expense or lack of access are barriers to some non-users (7% and 12%, respectively), a more significant portion of non-users cite relevance as reason why they do not go online:

- 33% of non-users say they are not interested,
- 9% say it is too difficult or frustrating,
- 7% say it is a waste of time.⁶

Home Broadband Adoption 2008 found that “even when controlling for the number of information devices a person may have and other factors, there is a significant correlation between attitudes about information technology and people’s choice of connection speed. This suggests that people’s age and income are not the only things behind the broadband choice. How people view the productive potential of information technology is also relevant – and not everyone sees this potential in the same way.”⁷

³ As of December 2008. National Cable and Telecommunications Association at <http://www.ncta.com/Statistics.aspx>; retrieved April 13, 2009

⁴ Pew Internet & American Life Project December 2008 survey

⁵ *Moving the Needle on Broadband: Stimulus Strategies to Spur Adoption and Extend Access Across America*, National Cable and Telecommunications Assoc., Mar. 17, 2009.

⁶ John B. Horrigan. *Home Broadband Adoption 2008*. Pew Internet & American Life Project, July 2008.

⁷ Id.

Especially in underserved communities, teachers and parents may not recognize the economic potential of broadband access and digital technology – and may be even more concerned about the potential dangers of the digital media world. (Underserved should be considered both rural areas where access and speed are an issue, and low-income neighborhoods where adoption is significantly lower than the average among the general population due to barriers such as cost and understanding of relevance and value.⁸)

Conclusion

Digital media literacy programs will spur broadband adoption by helping educators, parents and community leaders see how broadband and digital technology help children learn, and prepare them for the high tech jobs of the future. As importantly, digital media literacy programs will teach adults how to keep children safe in the digital world. By building awareness of the positives of broadband – and addressing the potential negatives – digital media literacy programs will encourage broadband adoption and ensure that our broadband investment brings the rewards we need.

Common Sense Media is a national nonpartisan, nonprofit organization dedicated to improving the impact of media on kids and families. We are led by concerned parents and individuals with experience in child advocacy, public policy, education, media and entertainment.

If you have questions about these comments, please contact:

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⁸ NTIA and RUS may wish to consider “underserved” to include areas that have schools receiving 80% or higher E-rate discounts. To receive the 80% discount, at least 50% of students in the school must qualify for the National School Lunch Program. See http://www.edlinc.org/get_facts.html#How%20are%20discounts%20determined.