

February 17, 2022

Marlene H. Dortch, Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

RE: WC Docket No. 21-476, *Report on the Future of the Universal Service Fund*

Ms. Dortch:

The Universal Service Fund (USF) is an important pillar in helping to connect unserved and underserved communities throughout the country. As the COVID-19 pandemic has made clear, however, the program is in serious need of reform to meet skyrocketing demand for essential services like e-learning and telehealth. Simply put, today's USF funding mechanism is ill-suited to meet the needs of an increasingly digital and mobile population.

We encourage the FCC use this historic opportunity to fundamentally transform the way we fund and connect low-income and unserved Americans. Only through bold action can we truly deliver on the promise to close the digital divide – a particularly urgent need for the approximately 45% of Hispanic/Latinx Americans that still lack access to basic broadband services.¹

For many Americans, including the communities our groups represent, affordability remains a principal hurdle to enjoying the benefits of a high-speed connection. Even in areas where connectivity is available, too many Americans are forfeiting digital opportunities simply because they cannot afford internet access. Reforming the USF system to support 21st century connectivity – rather than dated services – will be critical to supporting the FCC's stated goal of “universal deployment, affordability, adoption, availability, and equitable access to broadband throughout the United States.”²

Every major U.S. Internet Service Provider (ISP) has committed to addressing the digital divide through a combination of low-cost broadband offers and community investment. Now, the FCC must do its part to complement existing private sector led efforts and provide a holistic, sustainable, long-term solution expanding broadband access.

Importantly, it is within the FCC's existing authority to act on a comprehensive set of reforms that address access and affordability challenges confronting millions of

¹ National Urban League, [The Lewis Latimer Plan for Digital Equity and Inclusion](#) (2021)

² Federal Communications Commission, [Notice of Inquiry](#) (WC Docket No. 21-476) (December 2021)

Americans, and empowering low-income consumers with greater choice in service offerings. For example, the FCC does not need to wait for Congress to expand the USF contribution base to include large players that are today benefiting from a robust internet economy. For consumers, internet access– not telephone service – is the primary means to stay in touch with friends and family, access professional and educational opportunities, government benefits, and healthcare service, and so much more. Americans are using the internet to do much more than what today's USF program can support on an ever-shrinking source of revenue.

As Chairwoman Rosenworcel herself stated, “communications technologies today are the infrastructure of opportunity.” Yet, the disparities in connectivity that exist among communities of color persist. Without urgent action to fundamentally transform the USF, our communities remain at risk of being left behind.

Thank you for considering our perspective. We would welcome any future opportunity to discuss the importance of expanding access to digital opportunity and equity through meaningful USF reform.

Sincerely,

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CC: Jessica Rosenworcel, Chairwoman, FCC