



December 21, 2022

**VIA ECFS**

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

Re: Ex Parte Presentation of The Diversity Business Chambers; WC Docket No. 17-84,  
Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment

Dear Ms. Dortch:

Our collective Chambers of Commerce (“The Diversity Business Chambers”) represent millions of small, minority-owned businesses across the country. We fully support and applaud the Federal Communications Commission (“FCC”) efforts to address and remove infrastructure barriers that inhibit speedy and efficient deployment of broadband. Barriers to deployment, such as timely and efficient access to critical infrastructure like utility poles, must be addressed and corrected to ensure that America’s small business community continues to grow, thrive, and contribute to the economic vitality of communities nationwide. We encourage the Commission to act quickly to ensure utility pole access does not become a bottleneck to delivering much needed broadband to households and businesses with the greatest need. We ask that the Commission ensure fair allocation of costs between pole owners and attachers, as well as work towards developing rules that promote timely and cost-effective access to this critical broadband infrastructure.

Most businesses today rely on broadband access for nearly every aspect of their enterprise – from marketing to hiring to effectively competing in today’s global digital marketplace. In addition, an internet connection is integral to securing diverse supplier and procurement opportunities. Most supplier diversity programs rely on online applications and offer digital resources that require broadband connections to access. Having more consumers connected in communities also helps small businesses by giving them access to more customers who are able to access their products and services online.

We are pleased to see President Biden and Congress taking critical steps to address the broadband availability gap; namely, through passage of the Infrastructure Investment and Jobs Act (“IIJA”). This landmark legislation allocated \$65 billion towards broadband, resulting in the infusion of critical federal funding to support deployment of broadband networks in areas with the greatest need, among other objectives the law seeks to address – including improving broadband adoption rates.

For a business to innovate, grow and scale, access to broadband is second to none. Unfortunately, the availability of high-speed internet remains nonexistent for some rural communities, or connectivity is well below the Commission’s 25/3 standard. The IIJA seeks to expand broadband access while simultaneously putting support measures in place, such as the Affordable Connectivity Program (“ACP”), to help more households and consumers subscribe to new or existing broadband services available in their market.

As leading voices for the small business community, The Diversity Business Chambers’ goals are twofold:

1. Ensure that broadband deployment projects are reaching communities and businesses with the greatest need in a timely and efficient manner.
2. Certify that proper steps are being taken to ensure that businesses and consumers are connecting to critical internet services, particularly among racial and ethnic populations (i.e. Latino and African American) that are known to under-index in broadband subscribership.<sup>1</sup>

### **Timely and Efficient Broadband Deployment**

Over the last two years, the pandemic response from policymakers has placed a great deal of attention on expanding broadband access to unserved and rural areas. However, reaching unserved areas will require concerted efforts to remove barriers that delay timelines and increase costs of deployment, especially in areas that have been uneconomic to serve. Both are critical determinants to whether a broadband project is able to reach successful completion.<sup>2</sup>

Utility poles are vital links for many rural homes and businesses, but adding broadband infrastructure to those poles is a major barrier to broadband deployment. Buildouts often require many pole attachments, particularly in low-density rural areas.<sup>3</sup> In addition, requests to replace

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<sup>1</sup> Pew Research Center, Home broadband adoption, computer ownership by race, ethnicity in U.S. (July 16), 2021, <https://www.pewresearch.org/fact-tank/2021/07/16/home-broadband-adoption-computer-ownership-vary-by-race-ethnicity-in-the-u-s/>

<sup>2</sup> Connect the Future, Report: Advancing Pole Attachment Policies To Accelerate National Broadband Buildout. (November 28, 2021), <https://connectthefuture.com/wp-content/uploads/2021/11/Advancing-Pole-Attachment-Policies-To-Accelerate-National-Broadband-Buildout-National-Report.pdf>.

<sup>3</sup> Kristian Stout & Ben Sperry, *Issue Brief: Pole Attachments and Broadband Build-out: The Case for Reform*, INT’L CTR. FOR LAW & ECON (July 2021), <https://laweconcenter.org/wp-content/uploads/2021/07/Pole-Attachment-Issue-Brief.pdf>.

utility poles as a prerequisite to attaching to a pole is even more cost prohibitive, which prolongs the delay in bringing high-speed internet to households and businesses with the greatest need.

A recent study by Connect the Future discusses how delays in reaching pole attachment agreements and disputes about pole access have cost states millions of dollars.<sup>4</sup> The report underscores how pole reform could result in significant economic benefits by delivering internet connectivity to more places, faster.<sup>5</sup> To achieve the bipartisan goal of bringing internet connectivity to every household and small business, the FCC must complete its work on this issue and remove one of the most critical roadblocks to network deployment and work towards ensuring more timely and efficient utility pole access.

## **Robust Digital Adoption**

Digital adoption is critical for families and small businesses to thrive in today’s economy. Broadband enables access to remote education, telehealth services, job training, and remote work opportunities — all of which demand a reliable, high-speed connection. Unfortunately, access continues to remain uneven and disproportionately impact multicultural communities across rural and urban markets.<sup>6</sup> Over 30% of Black, Latino, and Tribal families lack high-speed home internet.<sup>7</sup>

This disparity is particularly severe in rural, southern areas with higher Black populations. In one study examining 152 counties across the South where at least 35% of the residents are Black – 38% percent of African Americans said they lack home internet access, compared to 23% of white Americans in the same areas.<sup>8</sup> According to an FCC filing by 18 national organizations, there are approximately 991 rural, primarily Hispanic communities with populations of less than 25,000 and many of these communities are “[u]rgently in need of the economic opportunities that could be delivered through high-speed broadband.”<sup>9</sup>

The proliferation of enhanced digital opportunity that comes with greater broadband expansion also stands to benefit a fast-growing Asian American and Pacific Islander (“AAPI”) community. According to recent Pew Research Center data, while a larger percentage of Asian Americans (45%) reside in the West, there is a growing presence of Asian Americans residing in the South

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<sup>4</sup> Connect The Future Coalition Report at 2.

<sup>5</sup> *Ibid*

<sup>6</sup> *Ibid*

<sup>7</sup> John B. Horrigan, *Students of Color Caught in the Homework Gap*, Alliance for Excellent Educ. at 2-3, tbls.2-3 (2020), available at [https://futureready.org/wp-content/uploads/2020/07/HomeworkGap\\_FINAL7.20.2020.pdf](https://futureready.org/wp-content/uploads/2020/07/HomeworkGap_FINAL7.20.2020.pdf); Emily A. Vogels, *Some Digital Divides Persist Between Rural, Urban and Suburban America*, Pew Research Ctr. (August 19, 2021), <https://www.pewresearch.org/fact-tank/2021/08/19/some-digital-divides-persist-between-rural-urban-and-suburban-america>.

<sup>8</sup> The Joint Center for Political Economic Studies, *Affordability & Availability: Expanding Broadband in the Black Rural South*, Joint Center for Political and Economic Studies. (Oct. 6, 2021), <https://jointcenter.org/affordability-availability-expanding-broadband-in-the-black-rural-south/>

<sup>9</sup> Comments of 18 Organizations led by the Multicultural Media, Telecom and Internet Council, WC Docket No. 17-84, (filed September 4, 2021), <https://www.fcc.gov/ecfs/document/109040895319950/1>

(24%), Northeast (19%), and Midwest (12%) parts of the country.<sup>10</sup> As broadband continues to expand into unserved and rural parts of the country, multicultural businesses and communities stand to benefit tremendously from the improved availability of broadband services, including the LGBTQ+ community. An estimated 20% of the total U.S. LGBTQ+ population reside in rural areas across the country.<sup>11</sup> In addition, 15% of LGBTQ-owned businesses are based in rural areas – which makes the lack of availability of broadband in rural areas an ongoing challenge for many of these businesses.<sup>12</sup>

## **Conclusion**

We look forward to working with the Commission as it seeks to adopt reforms that will further promote federal broadband goals, including modernizing pole reform processes that will expand broadband deployment and improve digital adoption outcomes. However, the FCC must act quickly to address and correct barriers to broadband deployment. Small businesses and households across the country stand to benefit tremendously by way of an improved national economic outlook, as well as greater digital inclusion, equity, and opportunity for businesses and consumers alike. But we need the Commission to act now to realize the full economic potential that broadband has to offer.

Respectfully,

National Asian / Pacific Islander American Chamber of Commerce & Entrepreneurship,  
National ACE

National LGBT Chamber of Commerce, NGLCC

National Puerto Rican Chamber of Commerce, NPRCC

The Latino Coalition

U.S. Black Chambers, Inc., USBC

U.S. Hispanic Chamber of Commerce, USHCC

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<sup>10</sup> Pew Research Center, Key facts about Asian Americans, a diverse and growing population. (April 29, 2021), <https://www.pewresearch.org/fact-tank/2021/04/29/key-facts-about-asian-americans/>

<sup>11</sup> Movement Advancement Project, Where We Call Home: LGBT People in Rural American (April 2019), <https://www.lgbtmap.org/file/lgbt-rural-report.pdf>.

<sup>12</sup> LGBTQ-Owned Small Businesses in 2021 – The Financial Health & Needs of LGBTQ Firms in the Small Business Credit Survey, <https://www.lgbtmap.org/file/LGBTQ-Small-Businesses-in-2021.pdf>.