

Broadband Funding for Multi-Family Housing

To Whom It May Concern:

I am here on behalf of (Organization), a nonprofit mission-driven affordable housing provider with (X) properties in (State) to urge you to ensure that funds made available for broadband infrastructure, access, and adoption reach residents of affordable rental housing, who are nearly twice as likely to lack high-speed internet connections as the general population.

The COVID-19 pandemic accelerated the shift to online services, making digital access an essential lifeline to sustain health and economic well-being. For millions of people of limited economic means -- a disproportionate number of whom are people of color -- little or no connectivity has deepened health and economic inequities, including many residents of affordable housing. As mission driven practitioners, we understand the critical link between digital inclusion and the health and economic well-being of affordable housing residents and a full and equitable recovery for communities.

Not only is the internet required to participate in the modern digital economy and education, it can also create a platform that will allow more low-income older adults to live independently longer by receiving healthcare services in their homes and help delay the transition to costlier long-term care. The rate at which telemedicine has been adopted by the general public has dramatically increased due to the Covid-19 Pandemic, but many residents of affordable housing have been left out because of lack of access to broadband, internet enabled devices, and digital skills training.

We were excited to see the bipartisan [Infrastructure Investment and Jobs Act \(IIJA\)](#) passed into law, the nation's largest public works investment in a generation. Through the Broadband Equity Access and Deployment Program (BEAD) and the State Digital Equity Capacity Grant Program, Congress provided states with ample resources to address the three primary connectivity barriers of availability, access, and adoption. Moreover, the eligible uses and covered populations outlined by both programs align with the connectivity needs of residents living in multifamily affordable rental housing. This historic investment presents an opportunity to eradicate our nation's stubborn digital divide, but we must make sure that the 20-25% of unconnected households living in multi-family and public housing, primarily in urban and suburban communities, are not left offline.

Affordable housing providers are already working to address broadband availability, access and adoption and can be key partners in deploying the \$65 billion allocated for broadband to bridge the digital divide in communities across the country. As your state begins to develop allocation plans, we stand ready to work together to implement fully-scalable, long-term solutions that close the digital divide at (#) communities in (State).

How Affordable Housing Providers are addressing the Digital Divide

Residents of affordable housing properties face three types of barriers that prevent them from equitable internet connectivity: availability (broadband infrastructure), access (broadband subscriptions), and adoption (technical skills for uptake). (Organization) has sought to address availability by providing wired access where possible and implementing building wide Wi-Fi networks as an alternative; however, in many locations the speed of available connections is inadequate or the cost of delivering a connection is prohibitive. While we have found some solutions, funding for these solutions is limited and rents cannot be increased to cover the cost of these vital services.

Even where the availability challenge is addressed, access continues to be the greatest challenge. The costs associated with broadband subscriptions are prohibitive for many residents of affordable housing and funding and regulatory frameworks do not provide landlords with a pathway for covering this expense. For example, the FCC's Lifeline program is challenging to join, and its shallow subsidy is insufficient to deliver affordable access. Discount programs offered by internet service providers (ISP) for lower-income households tend to deliver insufficient bandwidth and are usually closed to households with prior unpaid balances. The Affordable Connectivity Program (ACP), while an important measure, is limited in its reach to federally-assisted housing. The ACP and Lifeline programs provide automatic eligibility for residents of Federal Public Housing, but that eligibility does not extend to residents of other HUD affordable housing programs that have comparable income limitations, income targeting and tenant populations. At (Organization), we have worked to help residents access ACP, but there are significant gaps in coverage and there is no pathway for providing building wide eligibility, which would be the most cost effective and equitable method for residents to qualify. Finally, (Organization) is also seeking to address adoption barriers by (INSERT DESCRIPTION OR DELETE).

Broadband Equity, Access, and Deployment Program (BEAD):

As you seek to prioritize deployment of funds first to unserved locations, underserved locations¹ and high-poverty areas, we urge to prioritize affordable rental housing in (STATE'S) plan. We believe most of our properties are in these outlined priority areas and are well suited for investments in network deployment and broadband adoption. Congress recognized the need to address connectivity by explicitly defining eligible uses of funds to include **installing internet and Wi-Fi infrastructure or providing reduced-cost broadband within multi-family buildings**². Given the disparities in access between affordable housing residents and market-rate units, it is crucial that states prioritize projects that deliver high-quality, reliable, and affordable internet service to multifamily rental housing communities.

The nation's rental housing stock is aging rapidly —in fact, the Joint Center for Housing Studies estimates that more than half of all rental units were built before 1980 and nearly a fifth built before 1950. Rehabilitation, including the modernization of their communications backbone, of these and other rental properties is key to addressing the digital divide, while working to improve housing affordability and preventing displacement in communities across the country.

Thanks to innovative wiring techniques and wireless technologies, swift and cost-effective solutions are available for multifamily affordable housing. For example, in a 100+ unit building in Denver, CO a housing provider built a mesh network, allowing for Wi-Fi signals that are strong enough to penetrate individual unit walls so residents can access the internet in their homes. Since the mesh network requires less cabling and drywall patchwork, it serves as a feasible and less expensive alternative to retrofitting existing buildings.

We encourage your office to model the rules on broadband uses in the [US Treasury's State and Local Fiscal Recovery Funds \(SLFRF\) program](#), established under the American Rescue Plan Act. Treasury significantly expands eligible areas for investment beyond projects for unserved and underserved households by requiring recipients to invest in projects with an **identified need for additional broadband infrastructure investment**, which includes the lack of access to 100/20 Mbps or the lack of affordable service. The final rule also requires ISPs to participate in the FCC's Affordable Connectivity Program or provide access to a low-cost program. Importantly, Treasury recognizes that even if households have access to an internet connection that delivers 25/3 mbps, reliability and

¹ The bill defines unserved locations as areas with no access to broadband service or lacks access to reliable broadband service with speeds of 25/3 mbps or greater; underserved locations as areas that lack access to broadband service with speeds less than 100/20 mbps.

² IJA indicates that priority for multifamily should be given to buildings with a substantial share of unserved households; or is in a location in which the percentage of individuals with a household income that is at or below 150 percent of the poverty line is higher than the national percentage of such individuals.

affordability can still pose significant challenges; we encourage you to consider these as you develop your plans.

We appreciate the requirement that as part of BEAD, grant recipients must offer at least one low-cost broadband service option for eligible subscribers with guidance from states. To avoid some of the challenges in establishing individual household eligibility, when establishing criteria for low-cost plans, we encourage you to develop a low-cost plan specifically targeted to owners of federally-assisted multifamily housing properties. This would allow eligible owners to provide affordable access to all residents and overcome the barriers residents face in enrolling in low-cost plans. Additionally, the state should work with NTIA and the Department of Housing and Urban Development (HUD) to tie eligibility in low-cost plans to federally-assisted units, which would significantly lower enrollment barriers for households into low-cost plans. This could be verified through connections from the National Verifier to HUD databases such as the Tenant Rental Assistance Certification System (TRACS). Providing automatic eligibility for low-cost programs is crucial to achieving equitable access among residents of affordable housing.

State Digital Equity Capacity Grant Program:

The state digital equity capacity grant program, part of the Digital Equity Act, is key to addressing adoption barriers to connectivity. Because BEAD funds can also be used for adoption activities, we encourage you to design complimentary programs to achieve digital equity goals as Congress intended. As mission-oriented, high-capacity nonprofits, (Organization) is well equipped to utilize these funds to carry out digital inclusion activities. During the COVID-19 pandemic, we have adopted quick solutions to create the access that residents needed to connect with loved ones, engage in distance learning, and access health care services, among other critical activities. **We have often been able to leverage the trusted relationships between residents and onsite resident services coordinators or service delivery partners to deliver access and adoption solutions.**

To date, we have implemented (provide examples of projects at properties: i.e., device lending, hotspots, partnerships). However, the cost of fully-capable devices (including maintenance support) and capacity constraints in providing digital adoption support to residents are challenges for multifamily housing providers and prevent residents from fully utilizing their internet connections. The funds provided through the capacity grant program would support more sustainable adoption solutions, such as forming partnerships on digital navigator training programs, bolstering resident service capacity, strengthening digital literacy efforts, and providing free/reduced-cost fully-capable devices to residents.

Even where we can provide access and devices, further support for adoption remains a challenge. Throughout the pandemic, service coordinators have taken a lead role in digital inclusion efforts in many affordable housing properties. Yet due to capacity constraints, they cannot always provide their full attention to providing digital inclusion activities. The resources from the state capacity grant program would enable owners to supplement service coordinators' efforts through training and partnerships that can serve residents of affordable housing and the surrounding community.

Given our shared values and commitment to improving residents' health and economic well-being, we stand ready to work with our community partners in carrying out (State's) digital equity goals. As your office works on developing its state equity plan, we urge you to ensure that nonprofit affordable housing providers and their service delivery partners are eligible recipients as we can leverage our relationships and resources like service coordinators, partners and community assets to quickly deploy supports for access and adoption.

We have reached a critical moment in which affordable housing providers committed to addressing digital access and inclusion have an opportunity to access resources available from IJJA to fulfill overdue infrastructure upgrades, address both owner and resident access barriers, and fund digital inclusion activities. Now is the time for us to leverage these resources to bridge the digital divide across the state and ensure equitable access for all affordable housing residents. We look forward to collaborating with you and other stakeholders to identify connectivity solutions that meet the needs of affordable housing residents.

Funding to continue the Affordable Connectivity Program:

The Affordable Connectivity Program (ACP), helps eligible low-income families purchase of internet service and connected devices through a \$30 per month federal subsidy, or a \$75 per month federal subsidy for households on qualifying Tribal Lands.

Many Internet Service Providers participating in the ACP have rolled out high-speed internet plans for up to \$30 per month, or up to \$75 per month in Tribal Lands, which means that when the ACP federal credit is applied, eligible households can get home internet at no cost to them.

The ACP is expected to run out of funds in the first half of 2024.

Congress needs to take action now and allocate additional funding to ensure the ACP is available to the 16+ million households currently enrolled in the program.

We have finally arrived at a broadband subsidy program that addresses the cost barrier that keeps millions of households offline. The end of the program would be a disaster for families who generally have little savings or discretionary income and will suddenly face monthly broadband charges of \$30 or more.

Bipartisan support: The Affordable Connectivity Program has received bipartisan support in the past, reflecting its importance to communities across the political spectrum. Refunding the program would be an opportunity for Congress to work together to invest in the future of our country and ensure that all citizens have access to the resources they need to succeed.

Cost-effective investment: Refunding the Affordable Connectivity Program is a cost-effective investment in our country's future. By investing in affordable broadband, we can help to create jobs, stimulate economic growth, improve public health, and support educational opportunities for millions of Americans. The cost of not investing in this program would be much higher in the long run, both in terms of economic costs and social consequences.