



**Broadband Adoption Lifeline Pilot Program
Illinois Proposal
“Better Broadband, Better Lifeline”**

I. Introduction

The Partnership for a Connected Illinois (PCI) presents this proposal in response to the Wireline Competition Bureau’s announcement of the Broadband Adoption Lifeline Pilot Program. This application is submitted on behalf of seven independent Eligible Telecommunications Carriers (ETC). Together with digital literacy partners and carriers, a unified collaboration has been built in response to this announcement. Our hope is by coming together as allies, we can ensure that Illinois is able to decrease the Digital Divide among rural low-income residents. We believe connecting low-income people to resources, family, and friends will allow them to connect and progress down the path to independence, effectively leading to empowered future generations and a stronger community.

PCI is a 501(c)(3) non-profit organization based in Springfield, Illinois that began in 2009 when the High-Speed Internet Services and Information Technology Act (Public Act 95-684) authorized the Illinois Department of Commerce and Economic Opportunity to enlist a non-profit organization to implement a comprehensive, statewide high-speed broadband deployment strategy and demand creation initiative. The goals of the Illinois high-speed broadband deployment strategy, which PCI coordinates, include ensuring that Illinois residents and businesses have access to affordable and reliable high-speed broadband service; improving technology literacy, computer ownership, and high-speed broadband use among residents and businesses; establishing local technology planning teams to plan for improved technology use; and establishing and sustaining an environment that facilitates high-speed broadband access and technology investment. PCI is also the designated Illinois entity of the NTIA under the federal State Broadband Initiative grant program.

Illinois has a 63% adoption rate and therefore ranks in the lower half of the nation for broadband adoption. We are pleased to partner with seven carriers in the State of Illinois. Each has a robust legacy of providing broadband access where larger carriers have hesitated to go—the most rural parts of our state. These seven entities provide coverage in 35 of the 102 Illinois counties, and are ready and willing to expand their programs to offer a discount to low-income non-adopters.

Lacey Buss, PCI Grants Administrator, is the primary contact regarding this grant application. She can be reached at (217) 886-4030 or lacey.buss@broadbandillinois.org. Anne Madonia-Hubbard, PCI Program Manager, is the primary contact regarding the Pilot Program. She can be reached at (217) 645-6079 or anne.madonia@broadbandillinois.org.

A. ETC Identification Information

Names and Identifiers	Adams Telephone Co-operative; Adams Tel Coop	Cass Telephone Company	HTC Holding Co.; Harrisonville Telephone Company; HTC Communications Co.; HTC Technologies Co.	Schwartz Ventures, Inc.; Madison Telephone Company; Madison Network Systems, Inc.; Madison Communications, Inc.	Mid Century Telephone Cooperative, Inc.; Cencomm, Inc.; Century Enterprises, Inc.	Shawnee Telephone Company; ShawneeLink Corporation; ShawneeLEC	Wabash Telephone Cooperative, Inc.; Wabash Independent Networks, Inc.
Address	405 Emminga Rd.; PO Box 217; Golden, IL 62339-0217	100 Redbud Rd.; PO Box 230; Virginia, IL 62961	213 Main St.; PO Box 149; Waterloo, IL 62298	21668 Double Arch Rd.; PO Box 29; Staunton, IL 62088	285 Mid Century Lane; PO Box 380; Fairview, IL 61432	120 W. Lane; PO Box 69; Equality, IL 62934	210 S. Church St.; Louisville, IL 62858
Phone Number	(217) 696-8451	(217) 452-4101	(618) 939-9252	(618) 635-1000	(309) 778-8611	(618) 276-4518	(618) 665-3311
Contact Person	Rob Hutter, CFO	Mike Reynolds, Telecom Manager	Lee H. Whichter, VP of Regulatory Compliance	Mary J. Schwartz Westerhold, VP	James W. Broemmer, Jr., CEO	Michael Guffy, VP Regulatory Compliance	Jeffery D. Williams, General Manager/EVP
FCC Registration Number (FRN)	0004-3394-53	0003-7956-97	0003-7348-03	0003-7417-33	0002-8181-77	0003-7429-54	0004-3272-01
Study Area Codes (SAC)	340976	340984	341026	341049	341054	341025	341088
States designated to provide Lifeline service	Illinois	Illinois	Illinois	Illinois	Illinois	Illinois	Illinois

B. Full Description of Proposed Pilot Project

Q1.	Adams	Cass	HTC	Madison	Mid-Century	Shawnee	Wabash
Geographic Area Served¹	Areas in Brown, Pike, Adams, Hancock, McDonough, and Schuyler Counties	Areas in Cass, Mason, Adams, Brown, Fulton, Greene, Jersey, Menard, Morgan, Pike, Sangamon, Schulyer, Scott, and Tazewell Counties	Areas in Monroe, Randolph, and St. Clair Counties	Areas in Madison and Macoupin Counties	Areas in Henry, Knox, Fulton, McDonough, Mason, Peoria, and Stark Counties	Areas in Hardin, Pope, Gallatin, Johnson, and Saline Counties	Areas in Clay, Wayne, Wabash, Edwards, Richland, Marion, Jasper, and Effingham Counties
Geographic Area for Pilot	Entire Service Area	Entire Service Area	Entire Service Area	Entire Service Area	Entire Service Area	Entire Service Area	Entire Service Area
Census Data on Income Levels of Residents in Service Area (Median Income and % Below Poverty Rate)	\$43,824 12.3%	\$41,544 12.9%	\$68,253 4.5%	\$51,941 12.9%	\$39,545 15.5%	\$27,578 22.3%	\$38,016 16.3%
Tribal Lands?	No	No	No	No	No	No	No

Q2 & Q3.	Adams	Cass	HTC	Madison	Mid-Century	Shawnee	Wabash
Technologies Used	Broadband over fiber, copper, and 4G wireless	Fixed terrestrial broadband	Fixed terrestrial broadband	Fixed terrestrial broadband (copper, coaxial, fiber)	Fixed broadband via DSL or fiber	Fixed broadband, including fiber to the home in some areas	Fixed terrestrial broadband
Broadband Speeds	6-15 Mbps Down; 1 Mbps Up	Up to 4 Mbps Down; 1 Mbps Up	7-80 Mbps Down; 768 Kpbs-2 Mbps Up ²	Up to 10 Mbps Down; 1 Mbps Up ³	1.5-15 Mbps Down; 384 Kbps-1 Mbps Up ⁴	3-100 Mbps Down; 768 Kpbs-10 Mbps Up	1.5-3 Mbps Down; 378-786 Kbps Up ⁵

¹ Please see attached map (Appendix A) for complete coverage area and speeds offered.

²In some instances, at the farthest reaches of the network, only speeds of less than 4 Mbps up and 1 Mbps down are currently available. Speeds meeting or exceeding 4 Mbps up and 1 Mbps down are available to the vast majority of households.

³While lower speeds are offered, all households in this service area are capable of meeting or exceeding 4 Mbps up and 1 Mbps down.

⁴When services were first expanded to include broadband, speeds were not the main concern. As users demands have increased, so have speeds. 15 Mbps up and 1 Mbps down is offered in most locations of this service territory.

⁵Depending on the customer location, 1.5 Mbps down could be the maximum speed that may be available.

Q4. In order to provide a consistent Lifeline Pilot Program throughout each of these seven carrier territories in Illinois, all eligible subscribers will receive a \$40 discount off of the Monthly Recurring Fees for the broadband or bundled broadband and voice package they choose. Rather than designate the speed or package a low-income subscriber needs, the collaboration feels it is best to let the subscriber decide what they will be utilizing the broadband for, and therefore at what speeds. Consequently, the monthly cost per subscriber will vary, as outlined below. The lower cost is after the \$40 discount has been applied to the least expensive service the carrier offers. The higher cost is after the \$40 discount has been applied to the most expensive service the carrier offers. All seven carriers are requesting up to twelve months of subsidized broadband connection fees.

Adams	Cass	HTC	Madison	Mid-Century	Shawnee	Wabash
\$0-\$24.95	\$9.95	\$0-\$44.95	\$0-\$19.95	\$9.95-\$51.84	\$0-\$44.95	\$0-\$15

Terms and Conditions

- **Adams:** Offers approximately twenty bundled packages to include local phone service, long distance, and high speed Internet.
- **Cass:** Internet service is available as a package with voice service.
- **HTC:** All ranges of speed offerings are available on a standalone basis, as a package with voice service, or as a package with voice and television service.
- **Madison:** All ranges of speed offerings are available on an a-la-carte basis with local phone service, as a package with voice service, or as a package with voice and video service. Madison’s standard acceptable use policy and service terms and conditions are available at www.gomadison.com.
- **Mid Century:** Broadband Internet speeds and rates are based on a subscriber having an active landline local service with Mid Century. Subscribers may bundle landline voice with Internet or with both Internet and IPTV programming. Mid Century does not impose Internet usage limits.
- **Shawnee:** Utilizes standard acceptable use policy and service terms and conditions (available at shawneelink.com).
- **Wabash:** All ranges of speed offerings are available as a package with voice service, or as a package with voice and television service.

Q5. Each carrier in this collaboration is requesting a full waiver of the initial Non-Recurring Fees typically charged to new subscribers for installation fees. The following table lists the installation fees of each carrier. The resulting cost to new low-income subscribers would be \$0.

Adams	Cass	HTC	Madison	Mid-Century	Shawnee	Wabash
\$60.00-\$99.95 ⁶	\$30.00	\$19.95	\$49.95	\$24.95	\$149.95	\$50.00

⁶ The non-recurring installation fee for Broadband Service is \$60.00 with a landline. Without a landline, the installation fee is \$99.95.

Q6. The primary audience for this project will be low-income adults and others whom the Digital Age has passed by for reasons of timidity, education, or financial distress. Academic studies and practical experience show that a key success factor for adoption programs is convincing non-users that the Internet is relevant to them, as well as being an affordable utility. Our awareness campaign, detailed in question 8, will focus on the low-income consumers who have not yet found the value in subscribing to broadband and using the Internet.

Q7. The seven carriers in this collaboration have nearly 111,000 occupied households in their service areas. Based upon census data, there are approximately 13,000 occupied households that fall into the low-income category. As indicated in “Exploring the Digital Nation,” published by the US. Department of Commerce in November 2011, Illinois’ adoption rate is 63%. In contrast, the March 2010 report by the Social Science Research Council, “Broadband Adoption in Low Income Communities,” states the average adoption rate for the low-income population is a mere 35%. The aim of this collaboration is to bridge the gap between the low-income rate and the statewide rate. Therefore, it is anticipated that this project may serve 3,751 households. If so, the adoption rate among low-income consumers in these service areas would be at 63%.

A \$40 monthly discount for twelve months for 3,751 households equals \$1,800,480. Waiving the initial Non-Recurring Fee for these households equals \$235,700. Therefore, the Better Broadband, Better Lifeline collaboration is requesting a total funding amount of \$2,036,180.

Q8. In order to raise awareness of this program, materials will be developed and distributed to all households in the carrier’s service area via direct mail. The media will be notified of this new opportunity, and in addition to feature stories, ads will be placed in the newspaper and on the radio, where applicable. In addition, an open house event will be held in applicable communities to encourage residents to “get their feet wet” and see what is being offered. This awareness campaign will not only focus on the Lifeline Broadband Discount, but also provide compelling reasons for engaging in this process.

Q9. Each carrier participating in this collaboration is committed to offering the same level of personal customer service to low-income Lifeline broadband subscribers as it does to regular customers. Additional details are listed by carrier below.

- **Adams:** Plans to have personal contact with each participant in the program to ensure they understand the full scope of the program.

- **Cass:** Interested subscribers can call the business office for support, in addition to a 24-hour customer support hotline available to all subscribers.
- **HTC:** The same level of high quality customer service support will be offered to all subscribers.
- **Madison:** All participants will receive full, on-site provisioning of their broadband service at no additional charge. This provisioning, as compared to a customer self-installs, will assure broadband service is tested and working to the free Modem that is being supplied by the company as part of this program. Our on-site installation will allow the participant to communicate directly with our technician staff to assist in understanding broadband service. After completion of the initial installation, all subscribers have access to 24-hour, 7 day per week technical support. In addition, direct customer and technical support is always available during standard business hours from our Customer Service Representative and/or IT staff that are located in Staunton, IL.
- **Mid Century:** Does not differentiate the level of service based upon type of service or service class.
- **Shawnee:** Provides 24-hour, 7 day per week technical support to customers, as well as additional technical support staff on-site at Shawnee Telephone.
- **Wabash:** The same level of high quality customer service support will be offered to all subscribers.

C. Broadband Adoption Details

Q1. This pilot collaboration includes a detailed, organized, and experienced digital literacy component in the form of training and refurbished equipment. PCI has been tasked with administering a sizeable grant program using Small Business Administration (SBA) funds received through the Illinois Department of Commerce and Economic Opportunity. The target of the grant program is to increase broadband adoption and computer ownership. This opportunity is a perfect pairing with the Lifeline Pilot Program, and the bulk of the SBA funds will be used to pay for the digital literacy component offered through this collaboration. More information about the training component can be found in Section D below.

Q2. All seven participating carriers will provide the necessary connection equipment (modem, router, etc.) upon installation of new service in the home. This will be done at no-charge to the consumer, with the ETC bearing the cost.

Every new low-income subscriber in this collaboration will have the opportunity to receive a free refurbished desktop or laptop. The cost will be covered by PCI and by partners seeking to help bridge the Digital Divide, and there will be no cost to the subscriber or the carriers. PCI and our partners plan to purchase these refurbished computers in bulk to lower the cost, and has identified a process for the selection of vendors with whom we plan to engage.

D. Partner Names and Qualifications

Connected Living, Inc. and the Citizens Utility Board (Illinois) have been enlisted as valuable partners in this collaboration. These two organizations will work closely with one another, as well as with the carriers and PCI. The Citizens Utility Board will assist both Connected Living and the carriers with marketing and outreach of this new assistance program for low-income households lacking high-speed broadband access. Connected Living will conduct the training component. PCI will fund the cost of marketing and outreach, as well as the cost of the complete training program.

Citizens Utility Board—Qualifications and Experience

The Citizens Utility Board (CUB), Illinois' premier utility watchdog organization, is in a unique position to help rural Illinoisans bridge the digital divide. Dubbed by the St. Louis Post-Dispatch as the "gold standard" of consumer groups nationwide, CUB has wide trust among consumers of all ages, ethnicities, and political views, and can reach them in a way other entities do not. Since their formation in 1983, CUB has been the main "go-to" group for individuals, journalists, and decision makers seeking reliable information about telecommunications and energy-related issues in Illinois.

Over the years, CUB has cultivated and expanded its outreach program to the point that, in 2010, they participated in more than 400 public events throughout Illinois, with a total estimated attendance of more than 29,000. The outreach department interacts with consumers one-on-one and in groups through a wide variety of speaking engagements, workshops, and exhibits/booths. Events are held in all areas, and target all demographic groups. Many of these events are CUB-sponsored, while others have been organized by elected officials, churches, civic organizations, chambers of commerce, and other entities who invited CUB to participate. CUB views the Lifeline Broadband pilot to be a continuation of the work they already do in rural Illinois, and has the advantage of their broad name recognition and previous work with organizations in these areas.

CUB is excited about the possibility of launching a new consumer-education campaign around broadband issues in rural Illinois. They have worked extensively in these areas, developing a ready-made network of community groups, libraries, local colleges, media outlets, and elected officials.

Connected Living—Qualifications and Experience

Since 2007, the Connected Living program has provided highly effective ways to get seniors and low-income citizens online and connected. For many, a connected life can also be a path from poverty, as it fosters literacy, digital literacy, job training and the skills needed in the 21st century. The "high-touch" approach of combining simplified technology with training and support ensures that new technology is adopted, usage is sustained and all the benefits of leading a connected life become a reality. The Connected Living adoption programs have connected thousands of low-income seniors and adults with disabilities in 18 states.

Connected Living has achieved strong results through an established low-income training program through a previous grant program, “Getting Low-Income Seniors and People with Disabilities Online,” funded by the National Telecommunications Information Association, with matching funds from the Department of Commerce and Economic Opportunity and the State of Illinois. This award allowed Connected Living to bring broadband technology adoption programs to over 2,000 low-income seniors and adults with disabilities living in 23 government-subsidized housing communities in Northern Illinois, as well as to several thousand seniors living in the surrounding low-income neighborhoods. The graphic below details the components of this successful program.

BTOP Program Overview: Getting Seniors and Persons With Disabilities Online

Connected Living
people • technology • fun

Helping tech-timid seniors and persons with disabilities learn to use a computer and adopt broadband as a necessary life skill—Program participants learn how to use entertainment, education, wellness, social media, government resource websites

-  Access to simple, easy to learn, safe, secure Computer Training & Socialization website, Connected Living Network
-  Sustainable programs through 8+8 Volunteer Program using Resident Program Graduates to teach ongoing classes and provide open lab support
-  Distributed laptops and Refurbished computers to Program Graduates
-  Simple curriculum designed to help the new computer learner master beginner and intermediate skills
-  Subsidized broadband for Collaborator buildings and residents; neighborhood residents adopting new non-subsidized broadband accounts
-  Trained and Experienced Trainers provide classroom instruction and 1:1 participant coaching
-  Ongoing Evaluation and Reporting by Northern Illinois University
-  New or Upgraded Computer Lab with provided Internet Connection

Connected Living
people • technology • fun

The proposed program for this collaboration is a logical extension of the award-winning Connected Living Social Network and Computer Training programs. These programs have been implemented across several publicly and privately funded entities nationwide, including Housing Authorities in Atlanta, Boston, Washington D.C., Greensboro and across Illinois where the U.S. Department of Commerce’s Broadband Technology Opportunities Program (BTOP) grants awarded over \$8 million to digitally enable low-income communities. In addition to the 18 states we currently serve, Connected Living intends to expand the reach of training opportunities to the rest of the nation’s underserved populations, through programs similar to this.

With established training protocols, the Connected Living program has provided the most effective way to bring low-income adults online. Access to the Internet provides access to news, health information, and educational and government resources, all of which leads to an increased understanding and increased self-esteem. New Internet users are no longer reliant on others for information, but are encouraged to learn and build their own information network through their own online resources. Health and wellness opportunities present themselves through easy access to health information & resources, access to government and benefit resources are facilitated through online training and practice, jobs and applications can be updated and tracked, and financial information, combined with sourcing and budget management, often results in a more stable financial experience. All of these activities result in new broadband adopters.

Academic studies and practical experience show a key success factor for adoption programs is convincing non-users the Internet is relevant to them personally and is an affordable utility. Using best practices learned through the BTOP program, this program will address the barriers that typically prevent adoption and introduce the various benefits of broadband use and adoption through training and one-on-one relationship building. The benefits to increased engagement and broadband adoption are ongoing program and broadband sustainability.

Most recently, when surveyed, participating communities reported significant improvements among online residents including:

- More interpersonal connections and fewer instances of isolation.
- A happier and healthier living environment.
- Increased interest in online learning, wellness, and activities that make it possible to obtain or keep a job or start a business.

Over the most recent six-month period, the level of recruitment and participation in and around the 23 BTOP Collaborator communities increased by 300%, demonstrating once again, low-income adults really want to get online, and will, if given the tools, access and training needed.

Pilot Program Training Model

The Citizens Utility Board (CUB) will market this new opportunity widely throughout each carrier's service area. This awareness campaign will be conducted by direct mail and individual contact, using materials to be developed by CUB. Once locations are secured and a schedule for training is made, a "launch party" will be held. Community members and leaders will be invited to come to the event and hear more about what is being offered through the training program and other program aspects. Refreshments will be served and training sign-up will begin.

Connected Living will deliver training at broadband enabled sites like anchor institutions, park districts, senior centers, churches, area agencies on aging, etc. in each service area. Connected Living will hire and utilize local part-time trainers, bringing jobs to the local economy and a strong knowledge of local culture and events. Connected Living has found that the local knowledge base is important to the success of the training program, enhancing the connectivity between trainer and participant. Additionally, Connected Living intends to utilize a volunteer support base who will assist the trainers in delivering their lessons and assist the participants in solidifying their new computer skill base.

Classes will begin as soon as partner sites can be set up within the Connected Living Network. Classes will continue within the same partner locations as long as the site remains viable. Connected Living may choose to rotate class locations, depending upon the results achieved and/or regions still to engage.

Training will be facilitated with two lessons offered per week, making the entire class load available to complete in about a month. At end of eight lessons, trainees may take a voluntary assessment of their computer proficiency. Once they pass (multiple attempts are allowed), the trainee will graduate from the program, and receive a certificate of completion for use in job search and resume building. Upon graduation, trainees will receive a refurbished laptop or desktop at no cost, and will receive assistance in signing up for the Lifeline Broadband discount.

Classes will be conducted by a combination of trained local part-time staff members and volunteers and will utilize the award-winning Connected Living curriculum. Curriculum includes:

- Basic computer training
- How to use free email services
- How to access the Internet for information and fun
- How to use civic and local resources online (Driver's License renewals, government services, health information, etc.)
- Learning & using applications for daily life
- Job search and job training workshops (resume building, computers at work, etc.)
- Connecting to others through Skype/Google Talk
- Social Media 101 (intro to webpage design, e-commerce development, Twitter, and Facebook)



Curriculum will also include training on the simplified Connected Living Network web-based software, which will create an online community for trainees. The Connected Living Network is offered in English, Spanish, Russian and Korean.

E. Study, Research, and Evaluation

Q1. PCI will coordinate the study and research/evaluation of this collaborative project. The participating carriers and training entities will work together with PCI to collect and report the most pertinent and accurate data resulting from this project. John Horrigan, Director of Research at PCI, will be actively involved in the research and evaluation of this project (see Appendix B).

This project will focus on studying one main variable—how digital literacy training impacts adoption. The control group will receive broadband with no up-front cost, a monthly discount, and a free refurbished computer. The study group will receive the same benefits as the control group, with the addition of intensive small-group training on using the computer and Internet. A secondary variable to be studied is the choices subscribers make in determining suitable speeds for their service, as subscribers will be allowed to choose from all of the speed packages offered by the carrier.

The study group participants and control group participants will be assigned by zip code, and will aim to be equal in size. Regarding causal impact of the variations on broadband service, analysts will conduct all appropriate statistical tests to determine whether the differences in key outcome variables among different groups diverge in terms of statistical significance. Analysts will also construct a panel of respondents in the study in order to employ a longitudinal research design to explore individual's change in broadband behavior over time, and attempt to link changes in behavior to key variables in the study, such as different service plans, and the extent of digital literacy training. To mitigate any statistical biases in drawing samples from carriers with different service packages, efforts will be made to ensure that the sample is representative of the demographics of the region where the study is being conducted. To do that, analysts will compare the demographic composition of the sample drawn with census data on the demographic composition of the region where the study is occurring, and apply appropriate weighting techniques to be sure the sample represents the region appropriately. Based upon the number of low-income households amongst the seven participating carriers, a sufficient sample size should be obtained.

Q2. PCI will use a combination of resources for data collection purposes. Key demographic and usage information, as defined in Block E and Block G in the Public Notice Appendices, will be collected via a paper form completed by the subscriber at enrollment. At that time, the subscriber will consent to collection and sharing of this information in an anonymous format in order to receive the discount, and the subscriber will be assigned a unique identifier to be used throughout the study. In addition, all subscribers will be given an email address upon registration and will receive an email survey at the end of the project to collect the data described in Block H.

Q3. In addition to the Block H survey requirement, this program will use a Connected Living-developed two-page survey that will provide ongoing information relative to the users of the program (study group) and their potential interest/non-interest and experience/non-experience with broadband. The Connected Living Training Network portal is also capable of capturing statistics related to the amount of time spent online, which sites are visited, etc. in an anonymous format. Any data collected through surveys and the portal will be given to the FCC formatted in

datasets with the raw subscriber-level data used in the final analysis, and a data dictionary accompanying the datasets, with the exact wording used in any surveys.

F. Compliance

Each participating carrier will comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline-supported services by applying all of the consumer eligibility and enrollment procedures as detailed in Section VI and Appendix C of the Lifeline Reform Order. A copy of the certification form that will be used for enrollment is attached as Appendix C.

G. Subscriber Transition at the End of Pilot

Prior to the discontinuation of the broadband discount, the participants will be reminded of the benefits of being online. We strongly believe that access to the Internet provides access to news, health information, and educational and government resources, all of which leads to an increased understanding and increased self-esteem. We will market the many benefits of being connected to all program participants and encourage them to continue subscribing to broadband.

Special attention and outreach will be given to the Lifeline Broadband subscribers prior to the close of the pilot program in order to communicate pricing of continuing broadband service and assist the subscriber with any additional training needs to ensure a smooth retention transition. If subscribers do choose to discontinue service, they will not incur any fees or penalties.

H. Final Report

In conducting its analysis on respondents in the study, the research team hypothesizes that digital literacy training (in addition to other program benefits) increases the likelihood that a respondent who has received service in the Pilot Program is more engaged with broadband use than those who receive only equipment and service subsidies. The concept of "more engaged with broadband use" will be operationalized through a series of questions that ask users the types of activities they do online and benchmarks their comfort and competence with the Internet and computers. Through a longitudinal design, statistical tests will determine whether the digital literacy intervention resulted in differences between respondents who receive the training, and those in control group who did not.

Through interviews with organizations conducting digital literacy training, the research will determine the cost of providing the training to clients. In combination with information on equipment and service subsidy, as well as the longitudinal analysis that permits what makes someone "an engaged broadband user," this will yield the cost of making a non-adopter a broadband adopter. Understanding whether a subscriber becomes an engaged broadband user is key and the research will be designed to understand what interventions resulted in that status, and the cost of those interventions.

II. Certifications

Each participating ETC has attested to the following certifications, executed by an officer of the ETC under penalty of perjury. Signatures indicated such are attached as Appendix D.

- ETC intends to offer broadband service pursuant to Commission's rules and regulations for Lifeline program.
- ETC will implement all necessary procedures and efforts to prevent waste, fraud and abuse in connection with participation in the Pilot Program, including, but not limited to procedures that the ETC will have in place to prevent duplicate broadband subsidies within its subscriber base, and procedures the carrier undertakes to de-enroll subscribers receiving more than one broadband discount per household.
- ETC broadband service offerings will provide sufficient low latency to enable use of real-time applications such as Voice over Internet Protocol (VoIP) and if there are usage limits for each plan, they are reasonably comparable to usage limits for comparable broadband offerings in urban areas.
- ETC will participate in collection and sharing of anonymized qualitative and quantitative data with standardized data elements, formatting and submission requirements, and that ETC will participate in workshops to discuss interim and final results of the project, and how best to use limited universal service funds to increase low-income consumer's adoption of broadband services.