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by **Karly Werner** in **Digital Equity Public Comment (English)** id. 44596769

10 River Park Plaza  
St. Paul, Minnesota  
55107  
United States  
6519009953  
karly\_werner@cable.comcast.com

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Please provide your first and last name Karly Werner

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Please provide email address karly\_werner@cable.comcast.com

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Please provide a telephone number if applicable +16519009953

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If you are affiliated with an organization, please provide the organization name Comcast Cable Communications

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If you are affiliated with an organization, please share a brief paragraph about your organization and its work in promoting digital equity See attached general comments that illustrate Comcast's investment for more than a decade to expand digital equity and inclusion in Kansas, including through its Internet Essentials program, community outreach and engagement efforts, digital navigator and skills programs, Project UP, Lift Zones, and ACP Support.

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If affiliated with an organization, please provide a link to website <https://corporate.comcast.com/impact/project-up>

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Who is your main point of contact if we have further questions? Please provide their name and the best method to communicate with them if they are not the commentor on this form

Stacey Nelson Kumar, Director of Community Impact, Comcast  
Stacey\_NelsonKumar@comcast.com

Is there any additional background information you would like our office to know?

Please rank the Kansas digital equity plan on how it accomplishes the following:

Question 1: Outlines the current state of digital equity in Kansas

Question 2: Outlines a vision for digital equity in Kansas that recognizes the state's unique social and economic circumstances

Question 3: Identifies the barriers to digital equity faced by each of the state's covered populations

Question 4: Establishes an implementation strategy to achieve digital equity

Question 5:  
Describes how  
Kansas will  
coordinate and  
conduct outreach  
amongst digital  
equity partners and  
stakeholders

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Question 6:  
Describes how  
Kansas will  
coordinate its use of  
DEA funding with any  
funds it will receive in  
connection with  
BEAD or other digital  
equity funding

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Question 7: Identifies  
the assets available  
to help connect  
Kansas' covered  
populations

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Question 8: If there  
are any digital equity  
assets that you feel  
have not been listed  
in the digital equity  
plan, please list them  
here

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Question 9: Please  
indicate which  
sections of the  
Kansas digital equity  
plan you are  
providing comment  
on

Other section not listed or general comments

Please provide  
comment on any  
other section not  
listed, or provide  
general comments on  
the digital equity plan

Comcast Cable Communications, on behalf of its subsidiaries (together, "Comcast") submits these comments in response to the Kansas Office of Broadband Development ("KOBD") Draft Digital Equity Plan ("Plan" or "Draft Plan"). Comcast appreciates the opportunity to comment on the Plan and work with the KOBD to help achieve the goal of universal broadband connectivity, services, and digital skills for all.

The Plan cites U.S. Census data stating that 10 percent, or 115,885 Kansans, do not have a broadband subscription and paints a big picture for a digitally equitable future - that where you live is not a determinant of how you participate in the digital economy. Census data also suggests that an even greater number—more than 136,000 Kansans—have only a mobile

connection and no other connection available in their homes. These under connected households may not be able to fully take part in a digital society. Additionally, the Plan “developed by Kansans for Kansas,” recognizes the road to close the digital divide requires strong partnerships, including public-private partnerships, and financial resources. The Draft Plan provides “the creation and nurturing of partnerships is a key contributor to the success of digital equity efforts.” Comcast fully agrees with this vision and philosophy, we recognize the critical roles that the public, private, and non-profit sectors must play to ensure that digital equity efforts are successful, and are committed to digital equity efforts for every community Comcast serves in Kansas.

As the KOBD identifies throughout the Plan, achieving success in digital equity aligns with other State agencies’ plans and goals for the agricultural sector, educational outcomes, health outcomes, deliveries of essential services, and civic and social engagement. We support this notion; gains made in increased broadband adoption, digital literacy, skills, and cybersecurity protections will yield benefits across the State and in every sector. That is why it is critical to make strategic investments in programs that have demonstrated results, create a forum for sharing best practices and key learnings, and bring together practitioners and partners for long-term and sustainable initiatives across the State.

The Plan rightfully recognizes that “trust takes time,” that barriers affecting broadband adoption for all Kansans are amplified for Covered Populations, and digital equity practitioners need support to mature into a network of well-resourced collaborators working toward a unified goal. We applaud the work of KOBD to date in partnership with organizations like KC Digital Drive – an organization Comcast also supports, most recently with silver sponsorship of the 2023 Community Partner Event – which has yielded meaningful results in Affordable Connectivity Program (“ACP”) enrollment and an increased number of connected Kansans. This is an example of a robust model that can be scaled and replicated statewide in both rural and urban areas. By leveraging the work of existing partners and investing in proven strategies like outreach and awareness campaigns; digital navigators; and digital skilling and support, the State will see success in empowering Kansans so they can thrive wherever they live.

Given Comcast’s long and proven track record of success expanding broadband access and adoption in Kansas, Comcast stands ready to partner with the State in its digital equity efforts through various existing programs. Comcast offers these comments to the Draft Plan in the spirit of continued partnership and looks forward to continuing this critical work to close Kansas’s digital divide.

#### Comcast Has Invested Significantly in Kansas Connectivity

Comcast strongly supports broadband deployment and adoption initiatives in Kansas and is ready to further support the State’s efforts. Comcast continues to invest heavily in the State, with investments during the past three years totaling \$40.3million, including \$11.4million toward technology and infrastructure investments like Internet network upgrades. Nearly 58,000 Kansas homes and businesses have access to Xfinity Internet and

Comcast Business products and services, including speeds of 1.2 gigabits per second or more. Over the past three years, Comcast has added and upgraded nearly 10,000 miles of our network to connect homes and businesses across the United States, including Kansas, with plans to bring its next generation 10G network throughout the State.

Specifically, Comcast is investing \$9 million in a two-year project to expand our fiber-rich network infrastructure over 75 miles to the City of Spring Hill, bringing service to 3,400 additional homes and businesses in the area by early 2024. Comcast's Spring Hill investment also includes supporting local organizations such as Spring Hill Recreation Commission for community events where information about Comcast products and ACP is shared. Prior to construction beginning, Comcast created a network expansion FAQ construction page on the Midwest Region's local blog. This blog, which is updated throughout the construction process, is a community resource for residents looking for information on construction timelines in their neighborhood, as well as who to contact with any construction-related questions.

Furthermore, Comcast is funding an expansion of our reliable fiber-rich network to the homes and businesses in the City of Paola and the area of Hillsdale in Miami County. This 107-mile network expansion will impact more than 4,000 homes and businesses in the area.

This growth is all part of the more than \$20 billion investment Comcast made nationwide from 2018 to 2022 in our networks, which now cover more than 60 million U.S. homes and businesses. Supporting our local communities has been core to Comcast's DNA and given Comcast's long and proven track record of success expanding broadband access and adoption in Kansas, Comcast stands ready to partner with the State in its digital equity efforts through various existing programs.

## Internet Essentials

Internet Essentials ("IE") is the largest and most successful broadband adoption initiative in the industry, connecting more than 10 million Americans to broadband Internet at home since launching in 2011. IE is designed to be a wrap-around solution that addresses the main barriers to broadband adoption. IE provides subscribers with access to broadband service at speeds of 50/10 Mbps for \$9.95 per month or 100/20 Mbps for \$29.95 per month (for IE Plus), access to millions of Xfinity WiFi hotspots, a wireless gateway at no additional cost, the ability to obtain low-cost or no-cost computers, unlimited data, and free digital skills training. Notably, while the IE price of \$9.95 per month has remained steady since the program launched, speeds for that service have increased seven times, including more than doubling during the early days of the pandemic. Recognizing the critical need for Internet-ready devices in addition to a broadband connection, Comcast has distributed more than 200,000 free and subsidized laptops. The IE program has been designed to eliminate barriers for financially constrained households and help more families benefit from home Internet access. To become an IE customer, there is no credit check required, no term contract requirement, and customers who do not have a social security number (or prefer not to provide their social

security number) may provide other forms of identification to apply. Since 2011, 6,400 low-income Kansas residents in 1,600 homes have connected to the Internet through IE.

We have recognized that offering IE is not sufficient if there is no awareness of the program. Comcast, therefore, has spent significant effort identifying effective ways to share IE information with communities. For example, we have identified partnerships for sharing IE materials through Special Olympics of Kansas's Unified Schools initiative. We have also worked with KC Digital Drive to promote IE through their outreach efforts. In addition, we have made a significant investment in launching a three-month grassroots campaign in partnership with an agency to provide hands-on IE support to thousands of attendees at hyper-local events, such as farmers' markets, parks and recreation programs, and holiday celebrations. These awareness and sign-up events allow us to answer questions, assist in real time, and meet people where they are.

Comcast/Xfinity proudly participates in ACP with all tiers of Internet service the company offers, including two tiers (IE and IE Plus) that are fully covered by the \$30 ACP benefit. Beyond connectivity, we work with tens of thousands of partners across the country, including nonprofits and city leaders, to support digital skills training to improve economic mobility. We offer free training through our IE Learning Center: Internet Essentials – Free Internet from Xfinity ([xfinity.com](http://xfinity.com)), which features hundreds of modules on Internet basics, online safety, digital skills for everyday life, and advanced skill-building. The content is curated from partners like Common Sense Media, Goodwill, CNBC, Women in Sports Technology, and more. In addition, Comcast has partnered with several experts, including ConnectSafely, Older Adults Technology Services (“OATS”), and Council for Opportunity in Education, to develop printed digital skills curricula that are distributed to thousands of community partners free of cost. These include several online safety toolkits for seniors and students, discussion guides for parents, and our Jurassic World Science, Technology, Engineering, Arts, and Math (“STEAM”) curricula. Comcast has long invested in nonprofit partners focused on digital skills via the Comcast NBCUniversal Foundation to help provide skills-building, job training, and other career development offerings for the full spectrum of learners, from elementary, middle, and high school students to adults. Locally, these organizations include Boys and Girls Clubs of Greater Kansas City in Olathe to provide digital skills training and Olathe Salvation Army to provide access to technology and homework assistance.

According to a recent study, “Wired and Hired: Employment Effects of Subsidized Broadband Internet for low-Income Americans” published in the American Economic Journal, IE customers make an average of \$1,385 more per year and are 8 percent more likely to be employed than those eligible for but not connected through IE.

## Digital Equity Challenges and Opportunities

**Barriers to Broadband Adoption.** Both longitudinal research and empirical evidence demonstrate that the primary barriers to broadband adoption extend beyond affordability and include perceived relevance and digital

readiness, among others.

**Perceived Relevance.** A significant population of Americans who have not yet adopted home broadband do not recognize the relevance of such connectivity. The National Urban League (“NUL”) Lewis Latimer Plan explains that perceived relevance may be tied to a lack of awareness and understanding of the Internet’s uses and capabilities, in addition to the necessary skills needed to use it. NTIA’s Internet Use Survey data showed that 58 percent of the 21 million offline households indicated no interest in or need to be online. Moreover, a 2021 Pew Research Center survey found that 71 percent of non-broadband users say that they would not be interested in an at-home broadband connection. These numbers help demonstrate why education for and outreach to the unconnected and newly connected regarding broadband and its associated benefits is imperative for closing the digital divide.

**Digital Readiness.** Digital readiness is “the sum of the technical skills and cognitive skills people employ to use computers to retrieve information, interpret what they find, and judge the quality of that information” and “the ability to communicate and collaborate using the Internet.” Digital readiness challenges impact different parts of people’s lives, including the use of developing technologies, online educational resources, and telehealth capabilities. While the U.S. workforce has a high demand for digital skills, many workers, especially workers of color and those without higher education, lack these skills.

**Other Adoption Barriers.** Other adoption barriers pertain to information and language, distrust, and structural issues tied to poverty. Information and language barriers may pertain to individuals determining program eligibility, parsing an application process, and setting up devices and services. Addressing language barriers is important for Comcast, which is why IE call center agents can help IE applicants in more than 240 languages, in addition to American Sign Language. Distrust may pertain to biases against free services and government programs, as well as uncertainty about additional costs and privacy concerns. Structural barriers may include complicated housing situations, such as recent moves or plans to relocate. Comcast recognizes that just like there is not a single solution to addressing broadband adoption, the underlying challenges are also not monolithic.

**Bridging the Adoption Gap.** Empirical evidence demonstrates that community outreach and engagement – by digital navigators, community-based organizations, community anchor institutions, faith-based leaders, and other trusted voices – is vital to overcoming complex adoption barriers.

To this end, Comcast has been investing for more than a decade to expand digital equity and inclusion in Kansas, including through community outreach and engagement efforts. As the Draft Plan notes, “access is a starting point, but adoption and support are required for full effectiveness.” Project UP is our comprehensive initiative to advance digital equity and help build a future of unlimited possibilities. Backed by a \$1 billion commitment to reach tens of millions of people, Project UP encompasses the programs and community partnerships across Comcast, NBCUniversal, and Sky that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers, and creators.

Project UP encompasses a number of longstanding and new initiatives in collaboration with local communities, including:

**Digital Navigator Programs.** Digital navigators are a powerful and proven tool to aid broadband adoption, and the Draft Plan refers to them as “key pieces to the puzzle as we work to close the digital divide.” Digital navigators are typically hired volunteers or staff from trusted community institutions — such as libraries, social or public service agencies, and community-based organizations — who can assist users in overcoming barriers to adoption in a tailored manner.

Digital navigators can address the relevance of broadband by demonstrating benefits like access to information, telehealth capabilities, and introduction to upskilling programs that serve as pathways to education, employment, and more. A recent Boston Consulting Group (“BCG”) study supported by Comcast surveyed 1,500 people who have participated in programs with digital navigators and found that 65 percent of respondents were able to obtain Internet connectivity or a connected device, and 85 percent of respondents now use the Internet more frequently. The same research demonstrates that the benefits of digital navigators extend beyond individuals obtaining Internet access – almost 50 percent of respondents obtained better health care; more than 40 percent of respondents received support for essentials like food, rent, and housing; and more than one in three respondents found a new job or secured higher incomes.

Given the importance of digital navigators, in 2022 alone, Comcast invested \$11.4 million in more than 225 nonprofits to support digital navigator programs across our service areas. Those investments continue today.

Additionally, investing in digital navigators will provide individuals from all racial/ethnic and educational backgrounds with the opportunity to learn more from members of their own communities about the ways in which broadband-connected technology can be relevant to their lives. Research from BCG revealed several other key findings, including that (1) trust and relationship-building are key to reaching disconnected communities; (2) familiar outreach channels are most effective at getting learners in the door; (3) one-on-one attention is often most effective, especially for learning fundamental skills; (4) resource-sharing and local coordination can minimize burdens on individual digital navigators; and (5) digital navigators are the trusted voice on the ground for understanding community needs. These solutions address the main barriers to broadband adoption, as described above, and increase digital opportunity for all Kansans.

**Digital Skills Programs.** As digital navigators play a critical role in helping members of Covered Populations overcome adoption barriers, a related component of successful digital adoption efforts is programming to help people develop digital skills once they are connected. Comcast works with organizations that provide skills building, job training, and other career development offerings for the full spectrum of learners, from high school students to adults.



A February 2023 report from the National Skills Coalition and Federal Reserve Bank of Atlanta indicated that 92 percent of jobs available today require digital skills, yet almost one-third of U.S. workers lack opportunities to build these skills. Jobs that require even one digital skill can earn an average of 23 percent more than jobs requiring no digital skills, which translates to an increase of \$8,000 in annual income. Developing these digital skills is not only a value add for individual workers, especially for workers of color, but a benefit to the larger U.S. economy.

Comcast supports digital exploration initiatives that teach individuals the basic skills needed to increase competency and confidence in using technology, spark interest in technology careers, and prepare individuals for the jobs of the future through early exposure to technology fields, in-school and after-school programming, technology and computer science programs, and soft skills training.

Lift Zones. Comcast, together with nonprofit partners and city leaders, has created more than 1,250 Lift Zones in community centers nationwide, including a Lift Zone in Boys and Girls Clubs of Greater Kansas City's Olathe site. Along with free Internet connectivity, Lift Zones offer hundreds of hours of free educational and digital skills content. Not only are 50 percent of low-income households in major Comcast markets within walking distance of a Lift Zone, 40 percent of users report that they would not have had Internet access without the Lift Zone, and 58 percent report that the Lift Zone reduces stress for studying, working remotely, and managing online tasks.

Internet Essentials Partnership Program. In addition to IE, the Internet Essentials Partnership Program ("IEPP") is designed to help accelerate Internet adoption and provides the opportunity for school districts and other organizations to fund and quickly connect large numbers of students and families to broadband access. KC Digital Drive has been an IEPP partner for three years.

ACP Support. Among other significant investments in affordability initiatives, Comcast is committed to promoting ACP. Comcast has supported and/or co-hosted nearly 900 ACP sign-up events nationwide since October 2022, resulting in thousands of ACP enrollments. These events have taken place at senior centers, back-to-school fairs, public housing facilities, festivals, fiestas, and in parks. As noted in our IE outreach, ACP is also promoted through our three-month grassroots campaign with an agency, and partnerships with KC Digital Drive, Boys and Girls Clubs of Greater Kansas City, Special Olympics Kansas, and Salvation Army of Kansas and Western Missouri. The Draft Plan recognizes that funding critical digital inclusion programs should occur concurrently with outreach on affordability and adoption.

Comcast created a digital equity page on the Midwest Region's blog. In addition to providing information on Lift Zones and digital navigators, it features ACP information, including 11 videos translated in different languages such as Hindi, Urdu, Korean, Sign Language, and French on how to learn more about the program and sign up.

Other Initiatives: Accessibility. Comcast also remains focused on helping members of Covered Populations, including individuals with disabilities. In

addition to accessible technology innovations such as the X1 Voice Remote and the Xfinity Adaptive Web Remote, Comcast supports several partner organizations. The Comcast NBCUniversal Foundation recently awarded a \$1.3 million two-year grant to Easterseals to expand digital literacy training for young adults with disabilities enrolled in Easterseals employment programs. Students with intellectual and/or developmental disabilities ages 16 to 24 will be trained on how to navigate the Internet, communicate through email, create PowerPoint presentations, prepare resumes, use assistive technology, and more.

#### Final Thoughts

Comcast encourages Kansas to focus on digital equity efforts that will be the most impactful, including digital navigators, digital skills training programs, and partnerships. Comcast believes that partnerships are paramount to advancing digital equity efforts because closing the digital divide starts at the local level by meeting people where they are and responding to their specific needs. Communities win when the private sector, government, and community organizations join forces to achieve shared goals. To that end, Kansas should create an inclusive framework that allows many organizations to participate directly in grant programs and that fosters such participation through partnerships and coalitions. As Comcast's more than a decade of dedicated digital adoption and community engagement efforts demonstrate, the private sector has been a critical partner in facilitating digital equity efforts to date. Kansas's Digital Equity Act implementation should seek to amplify and scale the efforts of these existing successful relationships and ensure that the private sector continues to be a force multiplier for public funding.

Thank you again for the chance to offer our thoughts on the State's Draft Plan. Comcast looks forward to continuing to work with the KOBD as it refines its Digital Equity Plan.

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By submitting this form for public comment and evidence to support your comment, you are accepting responsibility for the accuracy of the information submitted and that it is true and correct to the best of your knowledge. You agree to be contacted by the Kansas Office of Broadband Development, Kansas Department of Commerce should the need arise. Furthermore, by making this submission, you understand that Kansas Department of Commerce and the Office of Broadband Development reserve the right to publicly publish your comment and evidence provided. Falsification of information will result in rejection of future public comment submissions and could result in legal action. Please type your name and today's date in the text box below.

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Karly Baraga Werner