Universal Broadband for Chicago

Introduction

The City of Chicago, the civic philanthropic community, and the internet service providers (ISP) that serve the city have a **historic opportunity** to eliminate the gap in broadband accessibility for hundreds of thousands of Chicago households. The coronavirus has made evident that broadband internet access is no longer a luxury, but a basic necessity. For the foreseeable future, Chicagoans will depend on internet access for just about everything, from students engaging in remote learning activities, to adults accessing vital healthcare and employment-related resources**.** Roughly 1 in 5 households in Chicago do not have internet today, with this barrier disproportionately hurting Chicago's low-income communities of color. We can anticipate the health, wealth, and well-being of these already vulnerable populations to decline if we do not move aggressively to address this challenge.

Phase 1: The most urgent challenge is ensuring the education of our city's PK-12 students — 1 out of 5 of which do not have a broadband connection at home. COVID-19 has forced Chicago Public Schools (CPS) to adopt remote learning for the remainder of the school year, and with the permissibility of in-person instruction at-risk for the 2020-2021 school year, the students who were already the most vulnerable to falling behind will now face even more challenges to keeping pace with their peers. Without swift action to close the Digital Divide, **we will witness a widening of the achievement gap**.

Phase 2: While we must immediately address the broadband internet needs of households with children, the City must not underestimate the importance of connecting all households. Leaving these remaining households disconnected will have a significant long-term negative economic impact on Chicago. There is no clarity on when our city will be able to move freely again, and medical experts predict our need to shelter-in-place during future outbreaks of COVID-19 (until there are other preventative protocols such as increased testing, contact tracing, a vaccine, etc. As unemployment rates continue to rise, the fact is that for most people, working in the COVID-19 context will require the internet. Not addressing the internet gap to all households will effectively cut 20% of the City, largely black and brown households, out of the labor force. Coupling that with the U.S. Census' prioritization of collecting online responses[1], further illustrates the economic risk of leaving households disconnected. According to experts from the Tax Policy Center of the Urban Institute and Brookings Institution, Chicago stands to lose $500 - $1,500/year for every undercounted person. Even conservatively assuming the approximately 150,000 households without children that are currently not connected to the internet are all single-person households, and that only 10% are households who would have completed their

[1] In anticipation of using the internet for the 2020 census, the U.S. Census Bureau reduced staff by 125,000 and issuing a statement in November 2019 declaring that "most households will first receive a letter asking them to complete the census questionnaire online." https://www.census.gov/newsroom/press-releases/2019/contact-strategies-viewer.html

census and are now unable to do so due to lack of internet[2], Chicago stands to lose an additional $15 million per year in federal funding. This is a very conservative estimation and doesn't begin to fully articulate the financial ramifications of leaving so many households disconnected. One might imagine a program that provides internet access to these households in exchange for completing the census.

The future vitality of Chicago's economy depends on a connected citizenship. It is in the best and immediate interest of the public and private sectors, as well as the city's philanthropic community, to help ensure digital educational equity[3] (Phase 1). Learning from Phase 1 can be applied to Phase 2, as it is critical that the City resolve the internet gap for all Chicago households.

This is a problem that can be solved through generosity, ingenuity, and resilience — strengths that are built into the fabric of our great city, and strengths that can compel us to confront digital inequities head-on.

It is important to acknowledge the ongoing leadership and investments our city's great institutions and companies have made to establish a strong foundation to address this urgent challenge, namely:

- The city, under Mayor Lightfoot's leadership, has consistently prioritized the expansion of broadband access to low-income families as a critical component of an overall strategy to bring renewed attention to long-struggling neighborhoods on the South and West sides.
- CPS's five-year vision outlined a comprehensive strategy to provide a classroom device for every student within five years, double the internet bandwidth at every one of its schools, and undertake a variety of other tactics to directly tackle the digital divide.
- Philanthropy has generously funded a vast array of initiatives to support digital learning strategies -- making critical investments at both the district and school-level, while also supporting partner organizations.
- Community-based organizations (CBOs) have provided the most vulnerable members of their communities with access to resources and support in connecting more households to broadband.
- ISPs have connected hundreds of thousands of low-income families with low-cost internet service and provided these families with ongoing training and support.

What follows is a proposal for public and private partners to operationalize a plan for Phase 1: to provide every eligible household with a PK-12 student access to broadband **from inception of**

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[2] Chicago response rate in the 2010 Census was 39.7%, https://www.chicagotribune.com/suburbs/daily-southtown/opinion/ct-sta-slowik-census-response-rates-st-0409-20200408-jodblpo3avgafn3hh2l5yaj54u-story.html

[3] We have seen public and private partners in other cities, such as Detroit, come together to fund internet service for its PK-12 student population during the COVID-19 crisis. Detroit's school district is providing 51,000 students with devices that will be equipped with LTE capabilities. The devices will be delivered in late June/early July and will come with six months of free internet service. The total cost is $23M, with $14.3M for the deives, $6M for the cellular data service (~5-30Mbps for the one device), and $2.7M for one-year of technical support for families as well as ongoing refurbishing and recycling of the devices. Detroit's school district has developed a plan to sustainably fund the initiative for the next four fiscal years, with most of the cost allocated to the data plan. More detailed information can be found here, while branding for the Connected Futures initiative can be found here.

this initiative through the end of June 2022. Where possible, we provide planning and recommendations for implementing Phase 2: connecting all Chicago households.

We first present a funding proposal, with accompanying documentation to support the underlying funding model. We then provide a detailed overview of the plan, including clear roles and responsibilities for each partner in the initiative and an actionable plan for implementation and measurement. Finally, we suggest immediate next steps and recommend specific external partners who are critical to the effective implementation of this initiative.

Overview of Operational Plan

Funding Proposal

We propose a two phase **$26M initiative** that would partition as follows:

PHASE 1:
$14M: Connect Chicago's Children

- Fully fund universal in-home broadband access for all 110,000 Chicago students (~60,000 households);
- Invest in CBOs to enable them to provide case management services, outreach activities, and skills development and digital literacy training for newly-connected households;
- Ensure families that (1) are highly mobile and/or (2) lack an expedient broadband connectivity option are provided with a free stop-gap internet solution until a broadband connection can be established[4];
- Cover all expenses associated with communicating with eligible families regarding both the general opportunity and specific broadband options; and
- Secure program administration from a single, trusted fiscal agent.

PHASE 2:
$12M: Connect Chicago

- Expands internet service funding to fully cover universal in-home broadband access for all eligible households lacking internet[5];
- Deepens investment in CBOs to enable them to provide aforementioned support for all newly-connected households.

[4] The plan would be to purchase the devices from a telecom company and get them to donate service for the duration of the initiative (14 months).

[5] Assumes that not all ~150,000 households without children will want or need to be connected (elderly households and residents who are retired or non-permanent), but maintains a healthy estimate that at least 120k will need connectivity with a 75% response rate (90k HHs).

Funding Breakdown[6]

Phase 1:

- **$8 million** allocated to fully-fund in-home broadband service for all 110,000 Chicago students, in which ISPs would compete with each other to offer qualifying households the best quality service at the lowest cost with the fewest barriers to sign-up;
- **$3 million** allocated for up to 30 community-based organizations to participate in design and outreach planning and implementation; conduct skills development and digital literacy training for newly-connected households; and provide case management support services;
- **$1 million** allocated to CPS to fund a variety of year-long outreach activities and reimbursement for all communications-related expenses targeting eligible families;
- **$700,000[7]** allocated to purchase up to 10,000[8] handheld mobile hotspot devices for families that require immediate access due to connectivity challenges; and
- **$100,000** to fund the Fiscal Agent.

Phase 2:

- **$10M** allocated to fully-fund in-home broadband service for the remaining Chicago households without broadband internet;
- **$2M** additional allocated to community-based organizations to deepen and broaden support to all newly-connected households.

This would leave a little over **$1 million** in contingency funds to cover additional in-home service subscriptions, additional payments to CBOs performing at an exemplary level, and/or other ancillary or unforeseen services or expenditures deemed necessary to implement the initiative successfully.

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[6] The specific funding responsibility for each partner is up for discussion. Based on philanthropy's strong interest in this initiative, there is the potential to lock-in their support for two years, until the end of the 2021-2022 school year. Philanthropy could fund the entire first year ($14M to $26M depending on activation of one or both phases) and the government could fund at 50% the following year with philanthropy covering the remaining 50%. CARES Act funding for PK-12 student broadband connectivity is still an eligible expense up through September 30, 2021 -- meaning the city could fund its portion of the initiative for the 2021-2022 school year without dipping into general operating funds. However, the ISPs may want to change the terms of the agreement after the first year, so costs could increase.

[7] Cost is based on a quote from 1Million Foundation for a one-time hardware purchase of handheld devices ($70 per device). The 1Million Foundation, which has a relationship with Sprint/TMobile, believes it could secure a year of free service from the carrier. Other telecommunications companies could be engaged on this opportunity as well to create more competition. The handheld devices are available now as compared to the mobile hotspot devices, which are not available until mid-summer 2020, even if ordered now. If the decision was to get mobile hotspot devices in advance of next school year, the cost would be roughly $265,000 less expensive.

[8] This is a hedge estimate of need in the event connectivity and families' individual situations prevent immediate in-home broadband adoption.. Budget could be adjusted and any purchases could be made in small (~500 device increments) to keep costs low and measure demand. If reducing overall plan cost is necessary, this line item would be the first to be removed.

Overview of Roles & Responsibilities

Internet Service Providers (ISPs)

Comcast, AT&T, and RCN[9] are critical partners in the effort to connect all eligible Chicago students to in-home broadband. To participate in this initiative, however, each ISP would have to agree to the following proposed terms:

Reduction in Barriers to Participation & Eligibility

- No requirement to sign a contract
- No background check required
- No credit check required
- ISPs would forgive any past debt from household stemming from past subscription[10]
- Any household[11] that qualifies for Federal Aid programs, including families that qualify for Free/Reduced-Lunch **or** that have a student enrolled in a Title I school, would be eligible (provided they do not currently have a broadband subscription)[12]
- Provide families with dedicated, Chicago-specific resources to sign-up. For example, families would not have to call a general customer service line, but instead each ISP would provide Chicago households with a dedicated number and customer support staff to sign-up.
- ISPs would also need to provide a plan to support households that eventually become ineligible for the initiative, possibly due to no longer meeting eligibility criteria or the initiative terminating. The idea is that families cannot be left in a lurch if their situation changes -- the providers need to have a plan to support them.

Reduction in Cost & Fees

- Each household connection would cost a maximum of $120 ($10 per month) for broadband from initial sign-up until **June 30, 2021**[13] (14 months assuming initiative is in place in May 2020).
- No installation fees
- No additional cost for modem/router rental over the term of the subscription

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[9] Two other low-cost broadband options included in the Federal Lifeline program include Spectrum and PCs for People, although we do not have a sense of their citywide connectivity coverage. Spectrum, through its Internet Assist program, provides eligible households speeds of up to 30 Mbps for a cost of $17.99/mo for wired service. A router to enable Wifi access is an extra $5/mo. At a cost of $23 a month, we are not including them on the list, but they could be engaged on the initiative. PCs for People offers qualified residents 4G LTE internet service starting at $15/mo. However, their devices are essentially mobile hotspots -- appropriate for highly- mobile populations and as a short-term solution, but not as effective as broadband or sustainable.

[10] Comcast currently requires additional review of any applicant who has a debt incurred in the past 12 months. AT&T requires no debt incurred in the past six months or no outstanding debt incurred under the Access program. This is negotiable.

[11] This includes undocumented residents so long as proof of address can be provided.

[12] Households would only be eligible if they do not currently have a broadband subscription. If ISPs want to prevent households from switching from one provider to another, they would be responsible for working with the City to create a confidential clearinghouse process to check customer addresses or for sharing customer lists in some other confidential manner that protects ISP records while validating eligibility of households in order to ensure compliance.

[13] ISPs and all partners would have the ability to renegotiate fee structure after the first year.

- No move-out/reconnect fee if family moves to a new location during subscription period[14]
- No data overage fees over the term of the subscription

Training & Marketing

- ISPs would provide free training on digital literacy to both newly-connected households and CBO staff supporting those households
- ISPs would pay for all citywide marketing campaign costs associated with the initiative.
- ISPs would be required to establish content filters on the service they are providing. This could be done directly by the ISPs or could be a part of the ISP's marketing/on-boarding in which the ISPs would provide detailed guidance to parents/guardians regarding how to set-up Parent Controls.[15]
- Each ISP would be required to submit its marketing and post-implementation plan (how it will support households in this initiative, etc.) to the city for review prior to implementation.

Service Requirements & Data Support

- All ISPs would be required to offer broadband service at a **minimum** 25 Mbps download speed and 3 Mbps upload speed[16].
- City would require ISPs to provide (1) saturation map of broadband connectivity and customers; and/or (2) support identification of households who may already have broadband by using list of eligible household addresses provided by CPS.[17]
- Following the initiation of the initiative, ISPs would need to furnish Partners with **monthly reports** detailing (1) number of new households connected, by community area (2) aggregated and disaggregated (household-level) data on usage patterns (educational vs. non-educational)[18]; and (3) connected households that are not using their internet service. ISPs and CBOs would be responsible for coordinating and following up with families to help understand and troubleshoot usage challenges[19].

To improve the effectiveness and efficiency of the initiative, we propose a **data clearinghouse**, possibly housed within the Fiscal Agent or a third-party entity with an exemplary reputation for data management/analysis, in which all non-confidential/proprietary data from the project -- including the households to connect, tracking increases in newly-connected households, monitoring usage patterns -- could be stored and made accessible in real-time to the initiative Partners at any time. Monthly reporting would be unnecessary, or at least minimal[20], if all Partners had access to real-time information inclusive of the aforementioned data.

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[14] If a family moves to a new residence that requires technical/wiring improvements necessary to connect service, the ISP would be reimbursed for the cost.

[15] CPS devices already have content filters, so this would apply to households not using a CPS device to access the internet.

[16] If this initiative is sustained, the minimum 25/3 Mbps download/upload should be indexed to national bandwidth averages to ensure families are getting the best possible service through this initiative.

[17] Our assumption is that ISPs will refuse to provide (1), but would agree on (2).

[18] This would align very much with information the district is currently monitoring through its device and mobile hotspot distributions. For example, the ISPs could report how often the household is accessing the top 15 CPS-identified educational programs.

[19] ISPs, through the dedicated customer service line, would be solely responsible for troubleshooting technical issues.

[20] City Hall and/or philanthropic partners may want monthly aggregated reports on progress.

*Please see **Appendix II** for a comparison of how the current offerings from the three ISPs align with the proposed terms/conditions to join this initiative.*

Managed Competition & Guaranteed Subscriptions

- Based on existing infrastructure and service capabilities, each household would have **at least** two broadband options and could choose the option best-suited to meet their specific needs.
- ISPs would compete to offer households with the best-possible package, potentially including higher speed than 25/3 Mbps, fewer barriers to subscribe, and more robust digital literacy and customer support offerings.
- In return for their participation, each participating ISP would be guaranteed **a minimum of 5,000 new subscriptions** over the course of the initiative, equating to at least $600,000 per ISP.

Community-Based Organizations (CBOs)

CBOs will play a critical role in facilitating greater use of broadband by eligible households. As noted above, at least $3 million would be allocated to fund select CBOs[21] for their participation in this initiative, including an upfront payment to cover new expenses to support the initiative, as well as the possibility of future payments dependent on the number of households that sign-up within the CBO's designated community. Below are specific activities CBOs will be required to conduct as part of their participation.

Outreach, Engagement & Case Management

- Identify/hire dedicated Family Connections' Liaison(s) at each CBO
- Provide input on the design of outreach and engagement as well as assess the tools necessary to ensure initiative is meeting its desired objectives
- Partner with ISPs, other community partners, and schools within their community to conduct household outreach and engagement activities that align with social distancing guidelines. Outreach activities would be conducted via phone, mailings, posters/signage, and phone/video conferences. In-person outreach could commence dependent on social distancing guidelines. This would include coordinating with district and specific schools to:
    - Engage eligible households that have not responded to broadband offer
    - Help find families for which the district and school have incorrect contact information
    - Raise awareness of opportunity within the community
- CBOs would also provide case management support to newly-connected households, including contacting households shortly after broadband connection established to

[21] Priority communities will be chosen based on an analysis of overall community need (% of HHs with children without broadband, # of children without broadband, and median income). CBOs will be chosen based on current participation in the City of Chicago's Invest South/West initiative and/or in CPS's Community Schools program.

ensure the household is aware of the CBO's dedicated Family Connection liaison, the ISP's digital literacy offerings, and help connect the household to any other vital services. CBOs would also work with ISPs to engage households who have received service, but are not using it.

Skills Development & Digital Literacy

- After receiving comprehensive training from ISPs, CBOs would be available to provide skills development and digital literacy resources to newly-connected households. This could include:
    - Helping households connect devices and set-up email accounts;
    - Signing up for CPS-recommended education software programs and other digital learning resources critical to effectively implementing the district's remote learning plan; and
    - Helping families connect to essential virtual services such as employment, financial, and healthcare-related programming.

Payment Structure

- Each participating CBO would receive 75% of their funding allocation up-front following approval of CBO's proposal to support the initiative, with the remaining 25% to be paid upon meeting objectives of reaching adoption of at least 75% of households with children in them. To be eligible, participating CBOs would be required to provide case management support for a **minimum** of 1,000 households.
- Additional funding may be available depending on CBO's full scope of services and number of households they are required to support.

Chicago Public Schools (CPS)

CPS's primary role during the COVID-19 closure is the education, safety, and support of its students. Specific to Phase 1 of this initiative, CPS would be responsible for the following activities:

- Identifying all eligible households based on (1) household-level annual financial submissions and (2) Title I school eligibility[22]
- Communicating both eligibility and specific offers to households using robocalls, text messaging, and mass mailings
    - CPS would be fully reimbursed for the cost of all communications requiring the expenditure of funds
- Identifying households with which the district has incorrect contact information and working with schools and CBOs to engage those families and obtain updated contact information.
- Surveying all families at the beginning of the 2020-2021 school year to determine if they have broadband access at home and directing them to offers if the household does not

[22] CPS is poised to further refine the list of eligible households to improve increased short-term precision and long-term sustainability through the use of additional student-level data and community/school hardship indices.

- Designating a single point of contact at each school to ensure schools are engaging eligible families on broadband opportunities
    - Using the GoCPS rollout as the model, CPS could create school-level and network-level financial incentives to ensure schools are maximizing their effort to identify and refer eligible families.

Additionally, connecting more families with broadband presents the district with the added benefit of new, innovative parent engagement opportunities. These opportunities would be even more essential if in-school instruction does not begin on time for the 2020-2021 school year. Activities could include:

- Using broadband to conduct parent-teacher conferences and other school-related engagement activities
- Hosting regular tele-townhalls with all CPS families, using the new broadband service as a mechanism to connect with a critical mass of CPS parents to engage on district priorities

Overview of Notification Process

Given its jurisdiction, CPS has the best available data about eligible households[23] for this initiative.

- Using robocalls/texting, CPS would inform households of eligibility and prompt them to call a toll-free number where a pre-recorded message would outline the 2-3 broadband offers with information about how to sign-up for their preferred option.
- Using mass mailing, CPS would include a letter informing households of eligibility as well as a one-page flyer outlining 2-3 broadband offers with information about how to sign-up for their preferred option.

City of Chicago

The City of Chicago would be responsible for overseeing the overall coordination of the initiative, including hiring a dedicated FTE to project manage and support implementation. The city also could be responsible for funding the initiative in future years.

- The City of Chicago could use general operating funds or CARES Act grant funds to support a substantial portion of this initiative where the focus is on households with children. ISBE has provided guidance indicating that CARES Act funds can be spent on broadband connectivity activities for PK-12 students until September 30, 2021.

Phase 2: Outreach to Remaining Households

Phase 2 outreach to households would benefit significantly from an agency (or several) playing a central role in quickly identifying and contacting eligible households as CPS has offered to do in Phase 1 efforts to reach households with children. Identification could be organized through the City, leveraging federal aid and housing data, to target households by address. These

[23] CPS only represents 87% of children in Chicago, with a slightly higher index within communities of color. In addition to outreach to households without children, CBOs will be responsible for reaching households with children where students are enrolled in non-CPS schools as many of them already have partnerships with neighborhood private schools.

efforts, as with the efforts to identify households with children who do not attend CPS, will benefit from the expertise of the CBOs.

Philanthropy

The city's philanthropic community has expressed a strong interest in funding this initiative, either in totality or a portion. Philanthropy would provide initial funding to pay for implementation in the first year. Additionally, philanthropy would serve as a critical thought partner as the plan is developed, finalized, and operationalized.

Fiscal Agent

We propose the United Way (UW) to serve as the fiscal agent for this initiative, as they have served as fiduciaries well in the past. The chosen fiscal agent's responsibility would be to ensure ISPs and CBOs are paid on a timely basis for rendered services. UW is aware of this emerging opportunity and prepared to support. Moreover, the UW currently has a targeted neighborhood strategy that could make their partnership in this capacity a benefit to the specific CBO engagement efforts.

Action Plan, Timeline, & Key Performance Indicators (KPIs)

For the proposed Action Plan & Timeline of Activities, please see the attached spreadsheet for a detailed overview.[24]

Please see below for proposed KPIs to help all Partners gauge the effectiveness of the initiative on a monthly/ongoing basis.

- *Measuring broadband adoption by targeted households (number of target households connected / number of target households)*. Measure the effectiveness of initial outreach to households (via CPS), the ISPs' marketing effectiveness (aggregated) as well as CBOs' outreach efforts (disaggregated by community).
- *Assessing case management support of CBOs* (number of newly-connected households contacted with information regarding digital literacy offerings / number of newly-connected households)
- *Assessing if CBOs and ISPs are successfully getting connected families to engage/re-engage in digital resources* (number connected households using broadband service regularly after being identified as not using regularly / number of connected households identified as not using internet service regularly)
- *Ensuring an appropriate number of ISP-created marketing events* (following specific goals set by city's point person on initiative, this would measure the number of marketing events implemented by ISPs in priority communities)

[24] Please note that the Action Plan & Timeline of Activities assumes that monthly reporting, rather than a real-time data warehouse, will be in effect at the initiative's inception. If a data warehouse is available and accessible by all Partners, some monthly reporting metrics would be unnecessary.

- *Measuring Actual Download/Upload Speeds* (actual download/upload speeds compared to minimum 25Mbps/3Mbps requirement)
- *Measuring Uptime/Downtime of Connected Broadband Service* (percentage of time in which service was in effect and accessible to connected households)
- *Annual compliance metric regarding annual re-confirmation of eligibility* (number of previously-enrolled households submitted confirmation for re-enrollment / number of connected households during prior cycle)
- Consider a metric to assess whether the usage of internet service is aligned with intended purpose (educational resources). This could be something like the number of connected households using internet primarily (<51% of usage) for educational purposes[25] / number of target households connected). However, it is not clear who would be accountable for changing resident behavior, or if it would be appropriate to do so.
- Finally, a measure could be developed to set a goal as to the number of households graduating out of needing public assistance to adopt broadband.[26][27]

Proposed Next Steps

Following the receipt of this proposal by the Mayor's Office, Kids First Chicago proposes a follow-up meeting to discuss the proposal, including answering all questions and concerns. **If the Mayor's Office finds the proposal generally agreeable, we would propose a meeting between key city officials and philanthropic representatives, followed by a convening between the city, CPS, philanthropic partners, and the ISPs.** Ideally this convening would happen by the end of the week of May
5th as it is critically important to connect as many households as quickly as possible, and in particular, immediately connect families with students needing internet connectivity to engage in digital learning activities. We propose the following individuals attend that meeting representing CPS, the ISPs, and philanthropy:

- Arnie Rivera, Chief Operating Officer, CPS
- Phil DiBartolo, Chief Information Officer, CPS
- Matthew Summy, Vice President, External Affairs, Comcast Greater Chicago Region
- Eileen Mitchell, President, AT&T Illinois
- Scott Burnside, Senior Vice President of Regulatory and Government Affairs, RCN
- Julia Quinn, Citadel
- Cason Carter, Citadel
- Christina Herzog, Crown Family Philanthropies

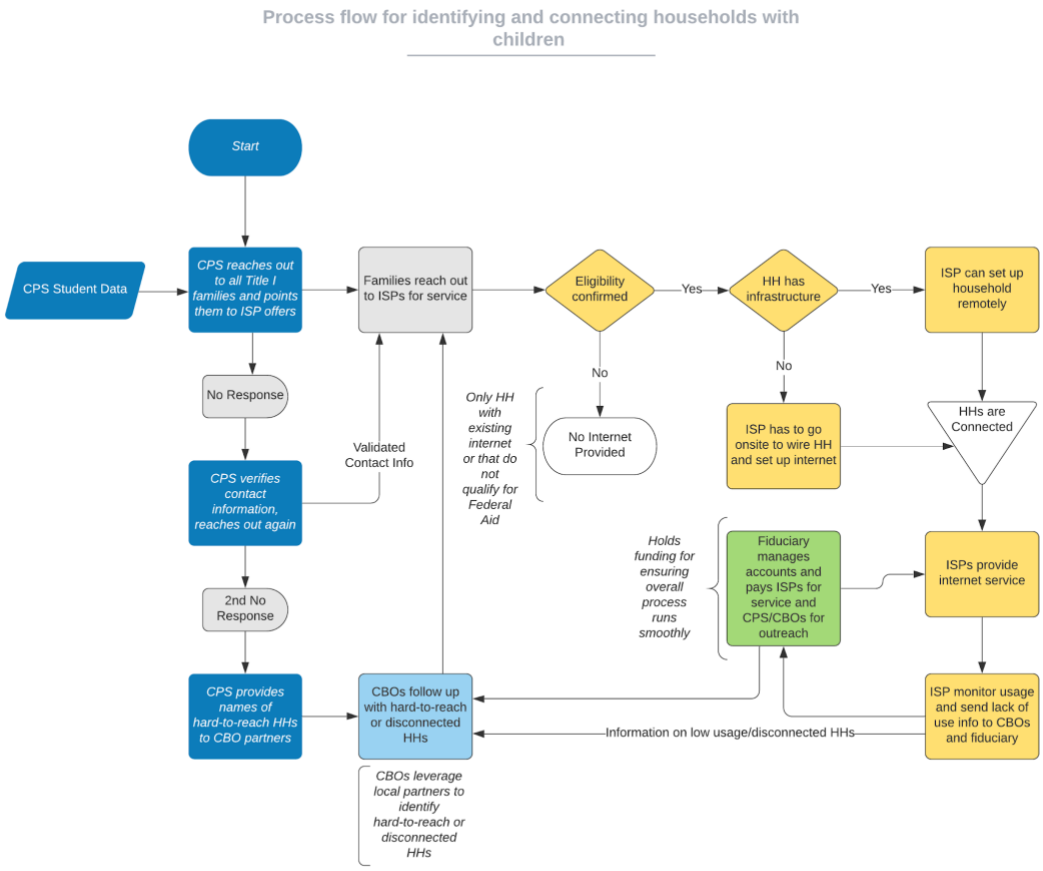
Kids First Chicago applauds our city's private and public sector leaders for all it has done and will continue to do in the months ahead to support our students and families -- and sustain Chicago's place as a world-class city to learn, work, and thrive.

[25] Depending on CPS' remote learning plan in summer 2020, we recommend not focusing on this metric over the summer months.
[26] Challenge is that this would depend highly on employment and other factors out of scope for this initiative.
[27] Challenge is that this would depend highly on employment, which is out of scope for this initiative.

Questions and comments are welcome and appreciated.

Appendix I

Phase 1 Process Diagram



Appendix II - Low-Cost Broadband Options

Below please find a table highlighting **differences** between the ISP's current terms/conditions for their low-cost broadband packages with the proposed terms/conditions in this proposal.

	AT&T	**Comcast**	**RCN**
Currently Offer Package Designed for Low-Income Families	Yes, AT&T Connect	Yes, Internet Essentials	Yes, Internet First
Barriers to Eligibility	**(1)** AT&T may require a credit check, but the result does not impact ability to get service. **(2)** AT&T has only temporarily expanded eligibility to include families eligible through Free/Reduced Lunch status; **(3)** AT&T requires no debt incurred in the past six months or no outstanding debt incurred under the Access program.	Comcast currently requires additional review of any applicant who has a debt incurred in the past 12 months. This provision is supposed to sunset on June 30, 2020.	RCN's program is fairly generous. No credit check or contract. Any past debt is deferred until a later date (but not forgiven). And the eligibility is consistent with the other operators. The only barrier is the rather limited service area.
Cost & Fees	**(1)** Offering two months of free service to new customers who order Access by May 23. $5/mo or $10/mo thereafter, depending on speed. **(2)** Current offer silent on move-out fee	**(1)** Offering two months of free service to new customers who order Internet Essentials by June 30. $10/mo thereafter. **(2)** Current offer silent on modem rental. **(3)** Current offer silent on move-out fee **(4)** Current offer silent on data overage charges	**(1)** Offering two months of free service to new customers who order Internet First. $10/mo thereafter. **(2)** Current offer silent on modem rental. **(3)** Current offer silent on move-out fee **(4)** Current offer silent on data overage charges
Training &	Fewer adult learning offerings online, but has experience conducting workshops	Comprehensive set of adult learning offerings with experience training	Fewer adult learning offerings online and unclear if the operator has

Marketing[28]	with CBOs and training individual residents.	both individual residents and CBOs.	any experience conducting workshops with CBOs and training individual residents.
Service Offered (current low-cost package)	$10/mo For speeds 5Mbps - 10Mbps $5/mo For speeds 768Kbps – 3Mbps	$10/mo for speeds up to 25Mbps	$10/mo for speeds up to 25Mbps

[28] The in-kind marketing for this program--from digital/social media advertising, to hosting sign-up events -- is unique.