



May 13, 2022

**Re: *Notice of Inquiry***, Implementing the Infrastructure Investment and Jobs Act: Prevention and Elimination of Digital Discrimination

**DA/FCC #:** FCC-22-21

**Docket/RM:** 22-69

The National Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship (National ACE) would like to provide a comment in response to the FCC’s inquiry on preventing digital discrimination, related to Section 60506 of the Infrastructure Investment and Jobs Act. We provide this comment alongside the U.S. Black Chambers, Inc. (USBC), U.S. Hispanic Chamber of Commerce (USHCC), and National LGBT Chamber of Commerce (NGLCC).

One of the FCC’s goals is to ensure that every person in the United States has equal access to high-quality, affordable broadband internet access. As the country and the world has confronted COVID-19, many Americans have turned to broadband connection to work and learn remotely, take advantage of telemedicine for vital healthcare needs, engage in civic activities, stay entertained, conduct business, and keep in touch with friends and family. Every person in the United States must have equal access to this crucial technology in an increasingly digital world.

The FCC commenced a proceeding “to ensure that all people of the United States benefit from equal access to broadband internet access service,” with the intention of identifying steps the FCC should take to eliminate “digital discrimination of access based on income level, race, ethnicity, color, religion, or national origin.”

The Infrastructure Act must be understood within the larger framework of addressing the digital divide. Access is not the only issue—affordability of service and lack of adoption are also factors that prevent people from being connected. While broadband prices have fallen over the last five years, there are still millions of Americans who can’t afford broadband at home.

Fortunately, three new developments from the public and private sector can help solve this problem:

1. the growth of the Affordable Connectivity Program (ACP),
2. new funding from the bipartisan Infrastructure Investment and Jobs Act (IIJA), and
3. the nationwide rollout of 5G home service.

Getting broadband deployed to unserved and underserved areas will require both public and private investment. The work of the Chambers will be vital to ensure opportunities for small and minority-owned businesses are included. This historic investment in the country’s infrastructure creates new opportunities for businesses to grow, explore new areas, and thrive. This is particularly important in the context of the pandemic, which created more challenges than ever for small, minority, and diverse-owned businesses.



Encouraging overbuilding in areas where affordability is the challenge will only reduce resources for those who truly have no options. Further, operators face challenges and roadblocks at the state or local level that prevent timely deployment in *all* communities. This will be especially relevant as states write additional rules and regulations into the grants provided by the upcoming National Telecommunications and Information Administration (NTIA) funding.

Finally, the Commission should take into consideration the benefits of diverse suppliers and vendors who build and maintain networks as part of their digital redlining initiative. The FCC's help in streamlining regulations and ensuring state/localities are working with operators will assist in speeding up deployment to the unserved and underserved. It is imperative that the Commission strikes a balance between the realities of deploying networks and the goals to connect marginalized communities.

Sincerely,

National Asian/Pacific Islander American Chamber of Commerce and Entrepreneurship (National ACE)  
U.S. Black Chambers, Inc. (USBC)  
U.S. Hispanic Chamber of Commerce (USHCC)  
National LGBT Chamber of Commerce (NGLCC)