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Asian Americans Advancing Justice |
AAJC

President and CEO
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October 15, 2024

Stephanie Weiner
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Submitted electronically via regulations.gov.

RE: Local Estimates of Internet Adoption (Project LEIA), Docket No. NTIA-2024-0003

Dear Ms. Weiner:

On behalf of The Leadership Conference on Civil and Human Rights, a coalition charged by its diverse membership of more than 240 national organizations to promote and protect the civil and human rights of all persons in the United States, and the co-chairs of The Leadership Conference's Media & Telecommunications and Census Task Forces, we write to thank the National Telecommunications and Information Administration (NTIA) for its request for comment on "Local Estimates of Internet Adoption (Project LEIA)"¹ and its larger work toward closing the digital divide.

The Leadership Conference's Media & Telecommunications Task Force works to ensure that civil and human rights, equal opportunity, and democratic participation are at the center of communication and technology policy debates. The Media & Telecommunications Task Force has long sought more complete, accurate, and granular data with respect to the interplay between access to advanced technologies and demographic data about the communities we represent.

The Leadership Conference's Census Task Force views an accurate and fair census — and the collection of useful, objective data about our nation's people, housing, economy, and communities generally — to be among the most important civil rights issues of our day. Our longstanding role as a Census Information Center has allowed us to lift up within our broad civil rights coalition the fundamental importance of comprehensive, high quality data about our population, communities, and economy.

We thank NTIA for the efforts in Project LEIA to add to our understanding of broadband access and use. As NTIA knows well, access to and adoption of technologies is a critical input for success in many other aspects of life — from education to employment to civic engagement. NTIA has been a strong leader in collecting detailed data on race and other demographic factors as it relates to broadband. For this reason, we urge NTIA to take into

¹ National Telecommunications and Information Administration Request for Comment on Local Estimates of Internet Adoption, Docket No. NTIA-2024-0003 (Sept. 9, 2024).

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account race and ethnicity and other variables relevant to the civil rights community in the final LEIA model.

Accurate Race and Ethnicity Data Are Critical to Addressing Disparities in Broadband Access

Existing disparities in broadband access are based on several demographic factors, including *race*, *ethnicity*, income, disability, and education level. NTIA has long collected such data and issued reports highlighting the interplay among various factors through American Community Survey data.²

NTIA should continue to provide data on how race and ethnicity intersects with other factors used in the final LEIA model. NTIA data show that 16 percent of African Americans, 22 percent of American Indians and Alaska Natives, and 25 percent of Hispanics rely exclusively on smartphones (a substandard technology for some uses) for internet access, compared with 12 percent of White non-Hispanics and Asian Americans.³ A study by Pew Research shows that communities of color are less likely to have a home broadband connection,⁴ and earlier research has found that even when accounting for demographic factors like income and education, African American and Hispanic communities still lag behind other communities in adoption.⁵ Incorporating race and other demographic data into the model's predictions will allow policymakers at the national and local levels, as well as other stakeholders, to track and develop solutions for communities who are continually left on the wrong side of the digital divide.

NTIA has previously collected data on education, race and ethnicity (using the categories “Black,” “White,” “Asian,” “Hispanic,” and “other race”), income, disability, and gender. We call on NTIA and the Census Bureau to not only use race, ethnicity, and other demographic data as covariates in the LEIA model, but also to publish LEIA estimates disaggregated by race, ethnicity, and other characteristics whenever possible. While regional estimates can elucidate geographic trends in access, further breaking these estimates down by race and ethnicity would be helpful in understanding localized internet access and barriers facing specific communities. NTIA and the Census Bureau should continue to seek input from community stakeholders on the LEIA model in order to better understand which covariates are most important to include for their communities and which data are most useful to publish.

NTIA and the Census Bureau should also work with community stakeholders to begin developing plans to implement the updated federal race and ethnicity standards — including the combined question format, new MENA category, and new requirement to further disaggregate race and ethnicity data — when developing inputs to the LEIA model and publishing the resulting estimates. These more detailed race and ethnicity data will be critical to identifying gaps in access. For example, new research from Asian

² E.g., NTIA Data Explorer, <https://www.ntia.gov/data/explorer#> (making data available according to demographics such as race and ethnicity, disability status, sex and more); Michelle Cao & Rafi Goldberg, “Switched Off: Why Are One in Five U.S. Households Not Online,” NTIA (Oct. 5, 2022), <https://www.ntia.gov/blog/2022/switched-why-are-one-five-us-households-not-online>; Rafi Goldberg, “New NTIA Data Show 13 Million More Internet Users in the U.S. in 2023 Than 2021,” NTIA (June 6, 2024), <https://www.ntia.gov/blog/2024/new-ntia-data-show-13-million-more-internet-users-us-2023-2021>.

³ Rafi Goldberg, “New NTIA Data Show 13 Million More Internet Users in the U.S. in 2023 Than 2021,” NTIA (June 6, 2024), <https://www.ntia.gov/blog/2024/new-ntia-data-show-13-million-more-internet-users-us-2023-2021>.

⁴ Demographics of Internet and Home Broadband Usage in the United States, Pew Research Fact Sheet (Jan. 31, 2024), <https://www.pewresearch.org/internet/fact-sheet/internet-broadband/>.

⁵ S. Derek Turner, *Digital Denied: The Impact of Systemic Racial Discrimination on Home-Internet Adoption*, Free Press (Dec. 2016), <https://www.freepress.net/news/press-releases/digital-denied-free-press-report-exposes-impact-systemic-racism-internet>.

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Americans Advancing Justice – AAJC shows that 17 percent of the overall Asian American, Native Hawaiian, and Pacific Islander population lack high-speed internet at home. Disaggregating this data across ethnic groups reveals that Filipino, Southeast Asian, Vietnamese, and Pacific Islanders were among the most likely to report using dial-up internet or having no internet access.⁶ Since producing LEIA estimates disaggregated by race, ethnicity, and other demographic factors may raise data privacy concerns at lower levels of geography, NTIA and the Census Bureau must consult community stakeholders to ensure that the estimates produced adequately safeguard individuals’ privacy while still yielding useful local data for all communities.

Thank you for your consideration of our recommendations regarding Project LEIA. We look forward to continuing to work with NTIA on this issue and others of importance to our country. If you have any questions about this letter, please contact Jonathan Walter, policy counsel at The Leadership Conference, at walter@civilrights.org, or Amy Vertal, senior manager of the census and data equity program at The Leadership Conference, at vertal@civilrights.org.

Sincerely,

Terry Ao Minnis
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⁶ “Digital Divide: In the Asian American, Native Hawaiian, and Pacific Islander Communities.” Asian Americans Advancing Justice – AAJC. (May 21, 2024) https://www.advancingjustice-aaajc.org/sites/default/files/2024-06/1399_DigitalDivide-Quantitative_Charter_Digital_Pages.pdf.