

applicants that have prior experience working with or conducting outreach to such communities. The goal of the ACP is to bridge the digital divide by connecting low-income and vulnerable populations to broadband service.² The MPSC is aware that historically disadvantaged and marginalized populations, including those that reside in rural communities and communities of color, have been disproportionately affected by the digital divide. Furthermore, the MPSC also recognizes that digital redlining has created and perpetuated inequitable access to broadband infrastructure and affordable broadband service in such communities.

The MPSC reiterates its prior ACP comments and continues to advocate for a concerted effort to reach households and communities most deeply impacted by the digital divide. When the ACP was created, Congress intended the program to provide broadband assistance to low-income and disadvantaged groups while also helping to bridge the digital divide. Grant applicants experienced in coordination and outreach in unserved and underserved communities and that can exhibit a record of past success in such efforts should be given special consideration in the awarding of ACP outreach grant program funds. Applicants with prior experience know the best practices pertaining to outreach efforts and can build on and leverage their existing networks and previous successes. The MPSC believes this will help ensure efficient use of funds by the program's outreach partners.

While the MPSC recommends that special consideration be given to grant applicants with prior successful experience conducting outreach to unserved

² [MPSC Comments in WC 21-450 \(Page 5\)](#)

communities, the MPSC cautions against using this specific element as the only deciding factor. Sole reliance on prior experience could eliminate grant applicants that may otherwise be more suitable to perform these outreach efforts. The MPSC urges the FCC to give special consideration to applicants with prior outreach experience without making it an absolute prerequisite for an applicant to participate.

Duration of Outreach Program

The FCC seeks comment on the duration of the proposed outreach program. The MPSC agrees with a proposed multi-year outreach grant program to align with the expectation that the ACP will extend for multiple years. The MPSC also encourages allocating more funding to the outreach program in year one. Since the ACP is an entirely new program, it is likely that the number of eligible households unaware of the program will be significantly higher in the first year than at any other point in time. The goal of the outreach program should be two-fold. First, raise awareness about the ACP so that as many eligible households sign up as quickly as possible. Second, the outreach program should continually strive to increase participation and promote the program to new households that become eligible through a change in circumstances or eligibility criteria while also continuing outreach to those households that have been eligible but have not signed-up for the benefit.

The MPSC proposes a coordinated effort to promote both the ACP and the Lifeline program through either the proposed outreach program or further outreach

efforts in the future. The ACP, coupled with Lifeline, has the potential to deliver more equitable connectivity solutions to eligible low-income households. In the FCC's June 2021 Report on the State of the Lifeline Marketplace, it indicates a trend of declining Lifeline participation.³ This decline may be due to a lack of knowledge of the program by those households that are eligible for the Lifeline program. The MPSC is concerned that if the proposed ACP outreach program were limited to just a single year, there is the potential for a future decline in enrollment in the ACP program similar to what is being observed with the Lifeline program.

Lastly, the MPSC believes that the FCC could draw from past successful public outreach programs, like the Digital TV transition, and apply that experience to the ACP outreach program. During the Digital TV transition in 2009, there was a broad messaging approach that was used which included radio and TV commercials, billboards, mobile advertisements, etc. The Digital TV outreach campaign appeared to be successful. The MPSC encourages the FCC to review the successes of the Digital TV transition and see if any could be applied to the ACP outreach program.

Conclusion

The MPSC appreciates the opportunity to provide comments on an important matter that will help to bridge the digital divide. Reaching communities that are most impacted by the digital divide is crucial in providing special consideration for grant applicants with previous successful experience working with these

³ FCC Report on the State of the Lifeline Market Place, June 2021, Pg 7.
<https://docs.fcc.gov/public/attachments/DOC-373779A1.pdf>

communities would help maximize the success of the program. The MPSC advocates for a multi-year outreach program with increased funding allocated in the first year to reach as many eligible households as soon as possible, while ensuring that adoption of the ACP benefit continues to grow over time through continued outreach efforts.

Respectfully submitted,

**MICHIGAN PUBLIC
SERVICE COMMISSION**

Steven D. Hughey (P32203)
Assistant Attorney General
Public Service Division
7109 W. Saginaw Hwy., 3rd Floor
Lansing, MI 48917
(517) 284-8140
hugheys@michigan.gov
P32203

Dated: March 16, 2022