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**VIA email**

June 1, 2012

Jennifer Jessup

Departmental Paperwork Clearance Officer

Department of Commerce, Room 6612

14th Street and Constitution Avenue NW

Washington, D.C. 20230

Re: ***In the Matter of Computer and Internet Use Supplement to the Census Bureau’s Current Population Survey [FR Doc. 2012-8103]***

Dear Ms. Jessup:

Enclosed are comments in the above referenced notice herein submitted by the Rehabilitation Engineering Research Center for Wireless Technologies (Wireless RERC).

Should you have any questions concerning our comments, please do not hesitate to contact me via email at [helena.mitchell@cacp.gatech.edu](mailto:helena.mitchell@cacp.gatech.edu).

Respectfully submitted,



Helena Mitchell, Ph.D.

Principal Investigator, Wireless RERC

Center for Advanced Communications Policy

Georgia Institute of Technology

Enclosure



**June 1, 2012**

**Comments of the Wireless RERC regarding the US Department of Commerce, National Telecommunications and Information Administration Comment Request:**

In the Matter of Computer and Internet Use Supplement to the Census Bureau’s Current Population Survey [FR Doc. 2012-8103], Released March 30, 2012

The Rehabilitation Engineering Research Center for Wireless Technologies[[1]](#footnote-1) (Wireless RERC) is funded by the National Institute on Disability and Rehabilitation Research (NIDRR) of the U.S. Department of Education. Our mission is to research, evaluate and develop innovative wireless technologies and products that meet the needs, enhance independence, and improve quality of life and community participation of people with disabilities. As such, the Wireless RERC has conducted a periodic Survey of User Needs (SUN) to identify trends in access to wireless technologies by people with disabilities, including mobile broadband. In 2009, the Wireless RERC presented at the Federal Communications Commission (FCC) Disability Broadband Workshop Policy Roundtable regarding the National Broadband Plan and accessibility. We have also filed comments with the FCC regarding a *National Broadband Plan for our Future* [GN Docket No. 09-51] and the *National Broadband Plan Public Notice # 4* [GN Docket Nos. 09-47, 09-51, 09-137] which sought answers to specific questions about the barriers, opportunities and policy recommendations of providing broadband access to people with disabilities; a community identified as an integral stakeholder in defining the capabilities of the envisioned national broadband plan.

The Department of Commerce, National Telecommunications and Information Administration (NTIA) proposed twelve question Current Population Survey (CPS) Computer and Internet Use Supplement (Supplement) is an effort to help achieve President Obama’s “national goal of universal, affordable broadband access for all Americans” by collecting data on broadband use via the CPS.[[2]](#footnote-2) The Wireless RERC applauds this effort by NTIA and agrees that the Census Bureau is the best vehicle for gathering such data. Our expertise in wireless technology access and the need for broadband to deliver robust services to people with disabilities leads us to offer several recommendations to ensure that information is also gathered on availability and usage amongst people with disabilities. A successful broadband deployment and adoption strategy must take into account availability, affordability and usability. For many deaf and hard of hearing people, broadband applications encompassing text and video-based communications and data access are their most important broadband wireless device functions. It is a news and information source, allows for communications without an intermediary, is of assistance during emergencies, facilitates telemedicine, and is a key route to employment via the on-line application process and telework. However, while a wide variety of advanced wireless technologies and broadband services have become available in the U.S., significant issues involving access to, affordability of and *accessibility of* these technologies still exist for people with disabilities.

The unfortunate irony is that recent advances that have the potential to provide greater independence and quality of life are often not obtainable due to lack of broadband availability or because they are not designed to be accessible and/or affordable to the people who could benefit the most. Case in point, while existing 911 to TTY[[3]](#footnote-3) lines are still in use and there is dial-up Internet service, neither is suitable for the current needs of people with disabilities or emergency managers. In fact, lack of broadband availability in underserved areas and to underserved populations is a key impediment to planning for and realizing the deployment of NG911 services.[[4]](#footnote-4) According to the National Emergency Number Association (NENA), the long-term deployment of NG911 should include three essential capabilities: (1) “enhanced features such as delivery status notification, typing indication, and session persistence; (2) Real Time Text (RTT) to “better emulate TTY conversations;” and (3) “three-way video calling…to glean tremendous information about a caller’s situation, environment, and emotional state while communicating via an American Sign Language [ASL] interpreter.”[[5]](#footnote-5) All three features require broadband connectivity. Further, because ASL is the fourth most common language in the U.S., any attempts to create ASL video will require broadband, which has the potential to save many lives.

NTIA’s own report, *Exploring the Digital Nation – Computer and Internet Use in the Home*, shows that people with disabilities are less likely to own a computer and have home broadband access.[[6]](#footnote-6) However, the demographic portion of the CPS does not ask for respondents to self-identify if they have a disability. Including such questions would reveal important statistics. Therefore, the Wireless RERC recommends that the following questions be added:

Do you have difficulty with any of the following activities? (check all that apply)

Seeing

Hearing

Thinking (learning, remembering or concentrating)

Speaking

Using your hands

Walking standing, or climbing stairs

If you have difficulty hearing, what is your level of hearing?

Hard of hearing (significant difficulty hearing)

Deaf (no usable hearing)

Not applicable

If you are deaf do you use American Sign Language?

Yes

No

If you have difficulty seeing, what is your level of vision?

Low vision (significant difficulty seeing even when wearing glasses)

Blind (without usable vision or completely blind)

Not applicable

Including the above questions will allow for the data gathered from the Supplement to be analyzed with regard to disability status to determine the specific trends amongst the different populations. Each group: deaf, blind, cognitive, mobility, have different factors that influence technology adoption, and at varying degrees. In order to address and remediate gaps in broadband adoption, the survey tool should be designed so as to facilitate nuanced analyses.

To that end, the Wireless RERC also recommends that NTIA add questions to the Supplement that would facilitate increased understanding of the various types of technology people with disabilities use to access the Internet and its content. The resultant data could facilitate broadband “affordability and maximum utilization[[7]](#footnote-7)” strategies. Noteworthy to this point is the fact that on our SUN survey 92% of people with disabilities owned wireless devices and increasingly indicated that mobile broadband connectivity was an important feature, yet nearly two-thirds of them (65%) had modified their device with some form of assistive technology to make it easier to use. Therefore, we recommend the following be added to the Supplement:

Do you use any of the following aids? (check all that apply)

Screen Reader

Screen magnifier

Hearing aid

Cochlear implant

TTY

Telephone relay service or video relay service

Augmentative and alternative communication (AAC) device or software

Text-to-speech technology

Speech-to-text technology

Other (please specify)

On proposed question number 5, “What is the main reason that you do not have a high-speed Internet access at home?” We recommend that you add a response option, “Issues with accessibility.”

On proposed question 5b, “What costs are you most concerned about?” We recommend that “Cost of assistive technology” be added as an option.

In conclusion, the Wireless RERC wishes to emphasize that any national survey tool designed to gather data on the state of technology use in the USA should include questions regarding disability and accessibility. Gathering such data will allow for the identification of barriers to technology adoption by people with disabilities and assist organizations, manufacturers, developers and policymakers on devising the appropriate strategies to create an accessible broadband environment, effectively narrowing the digital divide.

1. This Wireless RERC was made possible by the National Institute on Disability and Rehabilitation Research (NIDRR) of the U.S. Department of Education under grant number H133E110002.  The opinions contained in this document are those of the authors and do not necessarily reflect those of the U.S. Department of Education or NIDRR. [↑](#footnote-ref-1)
2. Department of Commerce (2012). *Proposed Information Collection; Comment Request: Computer and Internet Use Supplement to the Census Bureau’s Current Population Survey* [Federal Register/ Vol. 77, No. 65]. [↑](#footnote-ref-2)
3. The equipment is called a TTY (teletypewriter) and allows the individual, on an apparatus attached to the phone to type their telephone conversation or have the TRS center type and relay the message. [↑](#footnote-ref-3)
4. “Connecting America: The National Broadband Plan,” *Broadband.gov*, March 16, 2010, <http://download.broadband.gov/plan/national-broadband-plan.pdf>. [↑](#footnote-ref-4)
5. “Comments of NENA Before the Federal Communications Commission in response to the Notice of Proposed Rulemaking Regarding Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications [11-153] Framework for Next Generation 911 Deployment [10-25],” *Federal Communications Commission*, December 2011, <http://apps.fcc.gov/ecfs/document/view?id=7021750483>. [↑](#footnote-ref-5)
6. The Department of Commerce, Economics and Statistics Administration (ESA) and National Telecommunications and Information Administration (2011). *Exploring the Digital Nation – Computer and Internet Use in the Home*. Available at <http://www.ntia.doc.gov/files/ntia/publications/exploring_the_digital_nation_computer_and_internet_use_at_home_11092011.pdf> [↑](#footnote-ref-6)
7. Federal Communications Commission (2009). *In the Matter of A National Broadband Plan for Our Future* [GN Docket No. 09-51]*,*  ¶19, p. 53. [↑](#footnote-ref-7)