



August 18, 2025

**To: National Telecommunications and Information Administration U.S. Department of Commerce**

**Re: NTIA Request for Comment on Internet Use Survey: OMB Control Number 0660-0021**

## **Comments of Open Technology Institute at New America**

The Open Technology Institute at New America hereby responds to NTIA’s notice of information collection and request for comment on its proposed changes to its long-running Internet Use Survey.

### **INTRODUCTION**

The majority of the digital divide in the United States has been driven by adoption and affordability for some time now. Unfortunately, the policy landscape has not kept up, and policy mechanisms to address broadband non-adoption are woefully undersized to the scale of the problem. One of the problems underlying this underreaction is a lack of adequate federally-collected data on the particular barriers keeping people offline.

NTIA’s own data suggests that of the approximately 15 percent of households that don’t have a home broadband connection, under 3 percent are offline because broadband infrastructure is not available to their home.<sup>1</sup> This means the other 97 percent represents an adoption gap, not a deployment problem. Despite this, there are few major broadband subsidy or data-collection programs focused on affordability, digital skills training, or any kind of digital opportunity program.

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<sup>1</sup> National Telecommunications and Information Administration, Data Central, “NTIA Data Explorer,” June 6, 2024, <https://www.ntia.gov/data/explorer#sel=homeEverOnline&demo=&pc=prop&disp=chart>.

This problem has only become more salient with the policy events of recent months, since major broadband programs under the IJA have veered away from addressing broadband non-adoption. Since focusing on broadband deployment without addressing broadband adoption will result in building billion-dollar roads to nowhere, it is more important than ever that NTIA help ensure a return on investment by informing solutions to the major barriers keeping Americans offline.

In this context, continued interest in improving NTIA's Internet Use Survey represents a lingering beam of hope. This regularly collected data, which measures the scope and characteristics of both internet use and non-adoption in the United States, is an invaluable tool in designing solutions to the problem. However, the survey does not collect extensive enough data to inform evidence-based solutions to the problem. NTIA should focus now on generating data that comprehensively describes the extent of remaining connectivity gaps and identifies areas where policy solutions can be effective.

## **CURRENT SURVEY LIMITATIONS AND RECOMMENDATIONS**

In its longstanding efforts to address the digital divide, NTIA must not forget—and must indeed seek to improve—the data-driven approach that allows it to tailor solutions to the practical barriers keeping people offline. The Internet Use Survey, particularly the question that asks households without any home internet users to describe their main barriers to broadband adoption, remains a key tool for measuring the causes of the digital divide. Its history of responses creates a useful and regularly updated taxonomy of the problems keeping Americans offline today, which can be used to inform efforts to create subsidy programs, digital skills courses, and digital opportunity programs.

However, the survey suffers from some limitations that undermine its utility as a policy tool. Most critically, there is significant potential overlap among respondents' reasons for non-adoption, leading to many respondents likely being misclassified. The survey also fails to touch adequately on several important corners of the landscape. With the understanding that internet non-adopters do so for a number of reasons, many of which are interrelated, NTIA should still seek to expand and clarify its survey in an effort to categorize respondents as accurately as possible and surface solutions to the problems they face.

### **1. Better Understand Affordability Barriers**

First, NTIA should explore affordability concerns more thoroughly, especially since the recent failure of the Affordability Connectivity Program (ACP) has caused many households' broadband bills to spiral

upward.<sup>2</sup> The recent reconciliation bill further strains households' broadband budgets by not including those expenses in eligibility formulas for other subsidy programs and by slashing other social safety net programs.<sup>3</sup> These changes come on the heels of several economic crises in a world in which the price of a broadband subscription is already one of the major barriers to universal connectivity.

In the wake of these policy changes, it is more important than ever to fully understand the financial impact of a broadband subscription and the degree to which cost plays into households' decisions to stay offline. The survey should explore what kind of affordability program would solve these financial concerns. Previous NTIA surveys have also measured what amount people would be willing to pay for broadband, an important question we suggest NTIA continue to put forth.<sup>4</sup> Since low take-up rates often represent a significant barrier to affordability programs' success,<sup>5</sup> we also suggest that NTIA use this avenue to further investigate what subsidy amount would make it worthwhile for households to sign up for a subsidy program.

We suggest that NTIA add the following additional questions to its survey, to be presented to non-adopters that indicate their main barrier is cost:

- “What is the maximum monthly amount you would be willing to pay for home broadband internet service?”
- “What minimum monthly subsidy amount would make broadband affordable for your household?”
- “What minimum monthly subsidy amount would make signing up for a subsidy program worthwhile to you?”
- “Has the end of the Affordable Connectivity Program affected your ability to maintain internet service?”

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<sup>2</sup> John B. Horrigan, PhD, “What Does It Cost a Family to Lose Home Internet Access?” Benton Institute for Broadband and Society (Jul. 8, 2025), <https://www.benton.org/blog/what-does-it-cost-family-lose-home-internet-access>.

<sup>3</sup> John B. Horrigan, PhD, “Broadband Adoption and the Fraying Social Safety Net,” Benton Institute for Broadband and Society (Jul. 28, 2025), <https://www.benton.org/blog/broadband-adoption-and-fraying-social-safety-net>.

<sup>4</sup> Michelle Cao and Rafi Goldberg, “New Analysis Shows Offline Households Are Willing to Pay \$10-a-Month on Average for Home Internet Service, Though Three in Four Say Any Cost is Too Much,” National Telecommunications and Information Administration (Oct. 6, 2022), <https://www.ntia.gov/blog/2022/new-analysis-shows-offline-households-are-willing-pay-10-month-average-home-internet>.

<sup>5</sup> Raza Panjwani, Sarah Forland, and Jessica Dine, “Broadband Affordability: Removing a Roadblock to Universal Service,” Open Technology Institute at New America (Nov. 7, 2024), <https://www.newamerica.org/oti/briefs/broadband-affordability-removing-a-roadblock-to-universal-service/>.

## **2. Assess the “No Interest” Respondents**

Next, NTIA should seek to better define the true reasons motivating the least understood group—those respondents that cite “don’t need/not interested” when responding to NTIA’s survey. As other groups have noted, “not interested” has done the heavy lifting in describing the reasoning of the majority of the offline population for too long, and it falls short both in explaining the root causes of their behavior and in indicating potential solutions.<sup>6</sup> Worse, there is significant potential overlap between those respondents and those that choose “can use it elsewhere,” “not worth the cost,” “privacy/cybersecurity concerns,” and potentially any of the multiple other responses that call into question the respondent’s overall interest in getting online.<sup>7</sup>

This overlap likely results in meaningless distinctions among the groups based on a respondent’s inclination at the time of the survey. This systemic misclassification problem renders the survey’s data on non-adopters less helpful for policy decisions.

We recognize that removing “not interested” as a response altogether would interrupt the collection of years of longitudinal data, and suggest in the alternative that NTIA restructure it as a first-line response followed by secondary questions that assess whether respondents are reacting to more specific concerns—such as lacking digital skills or the price of a subscription—or are simply expressing an informed preference to avoid using the internet altogether.

## **3. Add A Digital Skills Assessment**

Digital skills become ever more critical as the world goes increasingly online. Today, lagging digital skills drive a lack of meaningful internet use that renders even households that pay for the internet less able to complete day to day tasks online. As essential resources like education, work, healthcare, and government programs move online, the skills to use the internet increasingly gate the population’s ability to access those resources—and exclude offline members of the population from using them altogether.

Despite their broad importance, digital skills are neither consistently measured nor defined in the United States. Indeed, there is no reliable assessment of digital skill levels among the population, nor is there any

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<sup>6</sup> Jessica Dine, “Comments to the NTIA Regarding the Ongoing Internet Use Survey,” Information Technology and Innovation Foundation (Aug. 1, 2023), <https://itif.org/publications/2023/08/01/comments-to-the-ntia-regarding-the-ongoing-internet-use-survey/>.

<sup>7</sup> Jessica Dine, “The Digital Inclusion Outlook: What It Looks Like and Where It’s Lacking,” Information Technology and Innovation Foundation (May 1, 2023), <https://itif.org/publications/2023/05/01/the-digital-inclusion-outlook-what-it-looks-like-and-where-its-lacking/>.

regular interrogation of the relationship between digital skills and non-adoption. NTIA should therefore include a basic assessment of digital skill levels in its survey to determine the degree to which lagging skill levels discourage households from getting online.

NTIA should include this additional response category when asking households why they have no home broadband: “I don’t have the skills to use the internet to do what I need to do.”<sup>8</sup>

This could be further clarified by asking respondents to select among several follow-up, such as:

- “I don’t know how to use internet connected devices at all.”
- “I have some skills but am often frustrated by day-to-day online tasks.”
- “I don’t have the skills to do the specific things I would want to do online.”
- “I am not confident in my ability to use the internet safely and securely.”

These responses could be used to create a rough taxonomy of digital skill levels in the United States and how they relate to non-adoption, providing crucial data for developing targeted digital literacy programs.

#### **4. Orient the Survey Toward Identifying Solutions**

Finally, NTIA should orient the survey toward surfacing solutions to the digital divide rather than passively cataloging barriers. To start, it should add a question targeted to those without home broadband that asks: “What would have to change for you to start using the internet?”

Options for responses could include:

- “Help signing up for an affordability or device subsidy plan.”
- “A free or low-cost broadband connection and/or device.”
- “Access to a personal instructor who could help me learn how to navigate the internet.”
- “Access to regular classes on navigating the internet and improving my digital skills.”
- “Better customer service and access to technical support from my internet provider.”
- “More relevant content in my language/more accessible content.”
- “Stricter privacy and safety regulations surrounding my online content.”

This data could create a publicly available and easily accessible taxonomy of the most needed solutions to address remaining barriers to broadband adoption.

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<sup>8</sup> Other organizations have previously suggested similar additions. *See, e.g.,* Dine, “Comments to the NTIA Regarding the Ongoing Internet Use Survey,” ITIF.

## **IMPLEMENTATION AND BROADER DATA COLLECTION STRATEGY**

In the long term, NTIA should not forget that digitally upskilling the population will be necessary for everybody to benefit from the internet. This upskilling is currently stymied by the U.S. government's failure to consistently define, measure, and track those skill levels. NTIA and the FCC should create a comprehensive digital skills framework that defines, standardizes, and sets relevant digital skills targets, and introduces methods of tracking these metrics as they change over time.<sup>9</sup>

That framework could be informed by the more consistent tracking of basic digital skills data collected through these improved survey questions. Indeed, the basic data collected from these survey questions could serve as the originator for this framework. To facilitate this, NTIA should also create a process to collect, analyze, and aggregate local-level digital skills data from local organizations (many of which have intake and exit forms measuring the digital skills of their clients). This would provide a more complete picture of digital literacy needs and trajectories across the country.

Once this data has been used to inform the creation of such a framework, NTIA can continuously draw from it to update its own survey questions and assess whether respondents have the particular crucial skills identified from the framework, ensuring the data stays relevant over time.

### **Coordination with Existing Efforts**

Throughout this process, NTIA should also ensure that it coordinates closely with existing digital skills and digital inclusion organizations to avoid duplicating work and to ensure that survey improvements align with the practical needs of organizations working directly with offline populations. It should also ensure it coordinates and shares information with any federal or local programs that operate in similar policy areas.

As part of this, NTIA should also consider reversing the cancellation of the Digital Equity Act (DEA) programs and awarding the funding to deserving organizations as Congress intended. In addition to providing the funding necessary for these organizations to scale, the DEA mandated data collection on digital skills gaps and reasons for non-adoption that would have provided a far more granular, relevant look at the barriers keeping Americans offline. In its absence, NTIA and the state and local governments,

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<sup>9</sup> Jessica Dine, "Exploring Paths to a U.S. Digital Skills Framework (and Why We Need One)," Open Technology Institute at New America (Nov. 19, 2024), <https://www.newamerica.org/oti/reports/exploring-paths-to-a-us-digital-skills-framework/>.

national organizations, and local institutions working to address the digital divide will continue to be hamstrung by a lack of data and lack of a clear federal trajectory.

## **CONCLUSION**

Despite policies intended to close it, the digital divide has only been exacerbated by recent policy decisions that have eliminated or reduced federal resources dedicated to digital inclusion. In this environment, improving data collection becomes even more critical to ensure that limited resources are deployed effectively.

NTIA's Internet Use Survey represents a crucial tool in this effort, but it should be substantially improved to provide more granular, actionable data about the causes of non-adoption and potential solutions. Policymakers relying on obscure or unhelpful data will continue to build expensive infrastructure that fails to address the true causes of the digital divide. The recommendations outlined here would transform the survey into a more useful, robust instrument for informing evidence-based digital inclusion policy.

Despite a long road of missed opportunities, there is still hope for creating targeted, effective solutions to finally close the digital divide. NTIA should continue to do its part in ensuring that any future policy solutions are the right ones.

Thank you for your consideration.

**/s/ Jessica Dine**  
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