Expanding Broadband Access: Understanding How the Affordable Connectivity Program Can Help

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As time passes, we've begun to see just how much unexpected impact the pandemic has had on our lives. For example, the pandemic shutdowns compelled many people to relocate from urban to rural areas in search of space. Those who made that lifestyle change may have discovered an unfortunate truth—that many rural areas tend to have little to no broadband coverage to provide even basic internet access or reliable cell service. This reality has had a significant detrimental effect on how people work, communicate, and even shop and entertain.

The good news is the problem of low digital connectivity in rural areas finally received the national attention it deserved. In December 2021,* the U.S. government passed the Affordable Connectivity Program (ACP) bill. It replaced the Emergency Broadband Benefit (EBB), which provided broadband coverage to more than 9 million households but still left a major digital divide for underserved communities and millions of individuals living on Tribal lands. The ACP aims to fill those digital gaps, providing universal broadband access through:

· Subsidies to providers (distributed by states) to build out infrastructure in underserved areas.

· Direct subsidies to low-income consumers to purchase broadband and devices such as computers.

Not only will the ACP improve the quality of life for millions of Americans, but it also presents a unique opportunity for telecommunications companies.

Telcos can take a visible lead role in implementing this important program by helping to drive transformation—not only in the underserved communities but also as the builders of the infrastructure to support future customer experience trends and present customer expectations. It is vital that everyone have access to the internet no matter where they live or their income status, and telcos can create that better tomorrow for everyone with 5G.

To examine how expanding broadband access through the ACP can help telcos drive transformation, Acxiom sponsored a study conducted by Harvard Business Review Analytic Services. The aim was to answer one fundamental question: Can we connect the idea of access to the internet and the new expectations of consumers as a reason to continue building out infrastructure in rural and underserved communities?

The answer? Yes. This is a pivotal moment for telcos. Today, telcos can help close the vast digital divide plaguing our rural and indigenous communities. Imagine people newly empowered by unrestricted internet access from anywhere in the nation, while also introducing profitable new customers to telco brands looking to expand. If you're intrigued, we invite you to read further for a better understanding of the impact of the ACP and the communities it serves, the challenges of enrollment, and the benefits of getting involved.

* https://consumercomplaints.fcc.gov/hc/en-us/articles/4412582232980-Need-Help-with-an-Affordable-Connectivity-Program-ACP-complaint-#:~:text=The%20ACP%20is%20a%20new,visiting%20fcc.gov%2Facp.

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From industry to education to leisure time, the internet has become the backbone of our society. The Washington, D.C.-based think tank Brookings Institution classifies broadband access as essential infrastructure, saying its influence affects "a wide range of conditions that impact health and life outcomes, known as social determinants of health."[1] In addition, broadband access is an engine for not only economic growth but also educational opportunities. Having access to high-speed broadband helps people attain economic stability, improve health outcomes, and participate more fully in society. But broadband isn't as ubiquitous as it would seem to be. A digital divide—the gap between those who have broadband access and those who do not—exists, keeping many Americans from enjoying better economic, educational, health, and other benefits.

The true cost of this digital divide emerged during the Covid-19 pandemic as students and workers across the country were forced to work from home. At the time, nearly 30% of all students in the U.S. lacked internet access or devices needed to handle distance learning at home, according to one Boston Consulting Group report.[2] Nine million students—about 20% of all K-12 learners in the U.S.—lacked both internet access and devices.

Not much has changed as the world adjusts to its new normal and the hybrid work/school model becomes the norm. A recent Purdue University analysis found that the digital divide remains a serious issue in the U.S.

HIGHLIGHTS

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If carriers and internet service providers are **struggling with conversion**—turning prospects into customers—they're probably not marketing to them in the right way.

> "The carriers all embrace [the ACP] and would like to see as much of the adoption as they can. But I don't know that any of them have found the silver bullet to get people to take it," says Craig Moffett, founder of MoffettNathanson, a division of SVB Securities.

The university created a Digital Divide Index that shows wide swaths of the country where there's little to no high-speed broadband access. Indeed, the tool characterizes[3] the digital divide as "the number one threat to community economic development in the 21st century."

The U.S. federal government attempted to remedy the problem early in the pandemic by introducing the Emergency Broadband Benefit (EBB), a program that was part of the Consolidated Appropriations Act, 2021.[4] It became law in December 2020 and was funded with $3.2 billion from the Department of the Treasury to help Americans afford internet service during the pandemic, according to the Federal Communications Commission (FCC). On Dec. 31, 2021, the FCC earmarked $14.2 billion for a new program called the Affordable Connectivity Program (ACP), designed to replace the EBB.

Despite the potential opportunities offered by the program, however, there has been relatively low uptake of the ACP benefit, according to Rural LISC,[5] a community development organization. As of May 2022, "the average participation in ACP by zip code is estimated to be 17% nationwide, while total participation as a share of national eligibility is estimated at 27%." The situation is more dire in rural areas, according to an August 2022 study by Purdue that found a "higher share of the population in counties with a high digital divide are rural, veterans, living in poverty, and disabled."[6] The problem of low ACP adoption is so glaring that the federal government announced the Outreach Grant Program, which went into effect on Nov. 7, 2022, and is designed to reach what it calls diverse populations. "For purposes of the Outreach Grant Program, diverse populations include people of color, persons with disabilities, persons who live in rural or Tribal areas, and others who have been historically underserved, marginalized, or adversely affected by persistent poverty or inequality," according to the announcement. This program resulted in millions of emails and texts going out to potential applicants, with states, cities, the Social Security Administration, the Department of Education, and the Department of Veterans Affairs, among others, evangelizing the opportunity, according to the Biden administration.[7]

For carriers and internet service providers (ISPs), the ACP presents an opportunity. The payoff for connecting with and signing ACP customers is potentially huge, driving acquisition and long-term customer retention because participating providers receive a subsidy for every signee automatically and there's no waiting for payment from consumers. The ACP funds are paid directly to the provider, which then issues a statement credit to the subscriber's account. Becoming an ACP provider has other benefits, too, including engendering positive public sentiment and—with a potential pool of 48.6 million new customers[8]—increasing customer bases. In addition, because the process to get approved and signed up for the ACP can be lengthy, it may also cut down on overall customer churn. Applicants may stick with a provider that helps them get approved rather than risk dealing with paperwork. Carriers can target existing customers, too, if they qualify for the ACP. Getting qualified customers signed up can help reduce their monthly bills, making it easier to upsell them additional services or higher tiers of service.

But enlisting signees under the ACP requires marketing strategies and work on the back end to help people with the onerous application process. That effort requires not just understanding why program uptake is so low but also determining what the best ways are to motivate and engage with these underserved consumers, something easier said than done. It's not because the carriers and internet providers don't care, says Craig Moffett, founder of MoffettNathanson, a division of SVB Securities based in New York. "The carriers all embrace [the ACP] and would like to see as much of the adoption as they can," says Moffett, who covers the telecom market. "But I don't know that any of them have found the silver bullet to get people to take it."

This paper will discuss where those carriers and internet providers can start when it comes to understanding the ACP and designing marketing initiatives to reach end users who will benefit from improved broadband access, as well as the organizations that serve them. The report will also explore which types of marketing are most likely to reach consumers, what the best options are for demand generation, and how telecoms can work with the FCC to get started with the program.

Finding the Right Audience

The ACP expands the number of people who are eligible for financial help for improved broadband access by bringing

the income threshold to or below 200% of the federal poverty line. The program provides participants with a $30 monthly discount for internet access as well as a one-time $100 discount to purchase a connected device. Consumers who live on Tribal lands can qualify for an enhanced Tribal benefit subsidy of up to $75 per month. All of the subsidies are paid directly to participating carriers and internet providers.

People also automatically qualify for the program if they are already receiving government assistance from programs such as the Supplemental Nutrition Assistance Program; Medicaid; Supplemental Security Income; a Pell Grant; the Special Supplemental Nutrition Program for Women, Infants, and Children; or federal public housing assistance. In addition, anyone who is already receiving telephone service through the federal Lifeline program can skip the application process as long as their current provider is signed up with the ACP. This sweetener means a subscriber could have mobile wireless service as well as fixed broadband wireless, according to the FCC.

Under the ACP, however, getting the message out about the program to potential recipients may require carriers and ISPs to get involved. Although the federal government has put out press releases, sent out messaging, and created an application portal, there's just not enough information out there about the program. Messaging about the ACP will require outreach and marketing, but both must be tempered with an eye on capacity and market readiness. Today, carriers and providers may be just beginning the work to upgrade systems and infrastructure in these underserved regions. Thanks to government support, there's money to make the physical upgrades, but completion may not happen for quite a while. The funding—which comes from the Coronavirus Capital Projects Fund, a portion of the $1.9 trillion American Rescue Plan Act, the $1.2 billion Bipartisan Infrastructure Law, and the $1 trillion infrastructure bill—hasn't been completely allocated yet. For example, the Biden administration says it will announce how it will dole out more than $42 billion in broadband infrastructure grants to states and territories by June 2023.

Still, carriers and ISPs don't have to wait for the physical infrastructure to be built to embark on their ACP-related marketing initiatives. There are consumers who have access to broadband service but simply can't afford it, something Vice President Kamala Harris pointed out in a Feb. 14, 2022, speech about the Bipartisan Infrastructure Law. "Half of all the people who do not have high-speed internet say it is because the monthly cost is too high," she explained. This is why going after this market segment should be a major focus for ISPs and carriers, and it's a journey that starts with education, says Blair Levin, a policy analyst for New Street Research, a telecom, media, and technology research firm based in New York.

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Levin, who is also a nonresident fellow at the Brookings Institution, says that the U.S. has a literacy problem that has extended into digital literacy, and the problems—and answers—are different depending on where you go across the country. "Communities are very, very diverse," he says. "And the problem of a Vietnamese community in rural Louisiana is very different from that of an African American community in Detroit or Los Angeles."

Understanding these disparities is where market research comes in, says Erik Huberman, founder and CEO of Hawke Media, a marketing consultancy based in Los Angeles. It starts with finding out who composes the unconnected cohort and how marketers are reaching them today. There's an easy tool called the National Broadband Map, which may help providers get started and is available online via the FCC. While the database is designed to let consumers tell the FCC about their broadband needs, ISPs and mobile carriers can use the information for research purposes as well.

The map details not only where fixed wireless broadband is accessible but also wireless broadband availability in states, counties, congressional districts, Tribal areas, and census places. In fact, the map provides information about broadband accessibility right down to the address level. The data includes what's available to each consumer address, including the type of technology, up and downstream bandwidth rates, and which providers serve the location. The downloadable resource is currently being updated via the FCC's Broadband Data Collection program.

Of course, broadband access may not be a priority for some people even if they qualify for ACP help, and that's a problem that isn't necessarily easy to overcome, says Erik Keith, a senior research analyst for broadband infrastructure within the telecommunications, media, and technology research group

"There is that element that people may be hesitant to, for example, switch from one provider to the next because they are worried that there might be an added expense after six months or the fact that they don't want to go from one provider that's not so great to another that's worse," says Erik Keith, a senior research analyst for broadband infrastructure within the telecommunications, media, and technology research group at Kagan, a part of S&P Global Market Intelligence.

at Kagan, a part of S&P Global Market Intelligence. "Under the qualifying income threshold, consumers may be focused on more basic things like paying utility bills, food, and shelter, and home broadband may not be a top priority, especially if they have children who can access the internet at school," he explains. Some carriers are looking to avoid this issue by introducing plans that meet the ACP broadband requirements and cost $30. Consumers pay nothing for these service plans.

Nor is it unusual that some people in underserved areas may have issues with trust when it comes to service providers and special deals, says New Street Research's Levin. "People in low-income communities are very nervous about free things because they're worried that their meager bank accounts will be tapped into," he explains. "In such communities, there is widespread belief if you go on the internet, somehow you're going to get hacked and all your money's going to disappear from your bank account."

Keith of S&P Global agrees, saying that the specter of bait-and-switch and a history of poor customer service also contribute to consumer reticence. "There is that element that people may be hesitant to, for example, switch from one provider to the next because they are worried that there might be an added expense after six months or the fact that they don't want to go from one provider that's not so great to another that's worse," he says.

This distrust is exacerbated when people try to sign up for the ACP, because the application process is difficult and frustrating for many, according to Joshua Stager, the policy director at Free Press, a nonprofit focused on legal advocacy for issues including broadband connectivity, net neutrality, digital equity, and antitrust enforcement.

"There's a lot of focus on awareness, obviously, and a lot of people need to understand the program exists. And that's, of course, always a challenge. But even when you get past that barrier, as you see with Lifeline and a lot of other low-income benefits, the application process is what trips a lot of people up," he says.

Stager points out that the process and the amount of paperwork that is required to sign up are onerous and unrealistic, particularly for a population that doesn't have a lot of time and may not have an internet connection to easily upload documentation. "For a lot of people, these [sign-ups] require multiple visits to a social services office or a physical site that may have limited hours, certainly during Covid," he explains. "That, in itself, is a very foreseeable barrier to overcome [for] this program."

Building Trust Within

Overcoming the roadblocks inherent in implementing the ACP can be achieved with careful outreach and education, as well as targeted marketing. To begin, ISPs and carriers create a presence within the areas they are targeting with the ACP, says Stager. This presence comes in the form of physical ads and storefronts. The reason for establishing such a presence is that people are more likely to purchase a service if they trust the salesperson and the brand they represent, he says. Mistrust of carriers is rampant, as are privacy concerns in a group that includes people who are used to walking into a store and paying cash for a prepaid service, Stager adds.

"Some of the ISPs that we've seen that have some of the highest trust [levels] are the smallest, local, and municipal networks," he says. The higher level of trust is thanks to these organizations having storefronts or salespeople in underserved communities and neighborhoods, he says. "People tend to trust that a bit more. And those ISPs also tend to have much simpler upfront pricing. So already, there's some of that trust built in, and there's a sort of human-to-human component of signing up for the service," he adds.

Dovetailing with this knowledge, carrier and ISP ACP marketing materials should be clear and easy to understand, with pricing and service offerings figuring prominently in ads and paperwork. Marketing collateral such as outdoor signage or ads should keep the customer in mind, too, says Kimberly A. Whitler, PhD, the Frank M. Sands senior associate professor of business administration at the University of Virginia's Darden School of Business. She suggests companies courting the ACP market undergo deep consumer understanding exercises that

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"If they are not having the conversion [rate] that they want, there's a failure to understand the target. And that failure could be translated into an inability to reach them in a way that works and an inability to send the message that would convert their beliefs or behavior," says Kimberly A. Whitler, PhD, the Frank M. Sands senior associate professor of business administration at the University of Virginia's Darden School of Business.

go beyond raw data and incorporate qualitative information, too. "The depth of insight comes from qualitative data," she says. This data may include field research—in other words, actually talking to potential ACP customers—as well as launching surveys, reading reviews, and looking at customer churn data. Messaging should be culturally appropriate, too. The National Hispanic Media Coalition recommends that marketing "prioritize investment in trusted messengers, culturally relevant programming, and in-language materials."[9]

If carriers and ISPs are struggling with conversion—turning prospects into customers—they're probably not marketing to them the right way. "If they are not having the conversion [rate] that they want, there's a failure to understand the target. And that failure could be translated into an inability to reach them in a way that works and an inability to send the message that would convert their beliefs or behavior," Whitler says. This messaging may even include the types of services that an ACP subscriber might want. Marketing wired service or fixed wireless, which is a wireless service that uses a fixed broadband modem, may be useless if prospects would prefer wireless service, Moffett says.

"The last data that I saw suggested that about two-thirds of the recipients are taking [the ACP funding] to pay for mobile wireless service, which they probably already had, rather than home broadband service, which, while allowable under the plan, I think you'd have to concede was probably not the expectation or the primary intention," he says. The lesson: ISPs and carriers should market where the interest is.

Another way to build trust is to help potential ACP customers overcome one of the biggest hurdles to signing up: the application process. Applicants can use an online form or print out an application that can be mailed in. When filling out the online application at affordableconnectivity.gov, applicants are required to scan and upload proof of identity, such as a photo of a passport, driver's license, or military ID. The site, which is written in English, also requires users to create a username and password. Someone who lacks broadband would have problems with both options, with many simply giving up, says Stager of Free Press.

Setting up a dedicated table or computer station, as well as a scanner, in a physical presence such as a storefront can help improve application completion rates and reduce bounce rates. It's especially important to have someone available to work with the people as they sign up, says Jeff Moore, the founder of Wave7 Research, a Kansas City, Kansas-based wireless research firm that covers U.S. postpaid, prepaid, and smartphone competition. "One issue that we've run into is that apparently the website has your information in it already, so if you drop one detail, the system will not accept you," he says. Having someone available to troubleshoot problems such as this one engenders trust and is something that can create a loyal customer, Moore explains.

Finding the Right Entry Point

Sometimes, the interest and ability to sign up are there, but carriers may be spending time and dollars on marketing something else entirely, says Whitler, of the University of Virginia. "A very simple way of going about marketing is you want the right message sent to the right person at the right time," she asserts. "And so it's apparent that [carriers] can't quite figure it out."

Huberman suggests carriers and ISPs focus on out-of-home marketing as well, incorporating vehicles such as billboards and street furniture such as bus benches and transit and bus shelters. Rural-area out-of-home marketing can focus on place-based media, including cinema ads, indoor restaurant and bar ads, and elevator advertising. The ads should be snappy and highly targeted, he says. "You need to think of a slogan around it—something that people can see over and over again and start to recognize that it is a thing versus a giant pamphlet about how you can get free internet that no one's going to read," he adds.

One of the best marketing options for carriers that have a presence in an underserved neighborhood is a simple grassroots campaign that happens right in or near the storefront, Moore says. He cites an example of Boost Mobile, a national low-cost wireless provider, which is doing a good

job getting the message out about the ACP. "They very strongly try and own the mile, so you'll see the company doing street events where they'll set up a table and put up balloons and maybe have a DJ with some music. And they'll be there saying, 'Hey, there's free internet available. Talk to Boost Mobile. We'll get you signed up.' They were doing it back when the ACP was the EBB, and they're still doing it."

Carriers may also be missing a huge market if they aren't going after people who currently use prepaid wireless. The prepaid wireless market remained steady at 74.4 million subscribers in 2022, according to Wave7 Research. The ACP may be very appealing to this customer base because prepaid phones typically lack the bells and whistles of high-end smartphones. With monthly prepaid costs coming in around $25 to $30, it makes sense to sell the ACP with its device subsidy and lack of out-of-pocket costs to the people who are currently using prepaid options.

Moore says Cricket Wireless, a subsidiary of AT&T, is using "yard sale-type signs" in front of its stores, targeting people who would normally use prepaid phones. What's interesting is that Cricket isn't just pitching the ACP as free internet, he says. "Sometimes, it's pitched as free internet, but more often, it's pitched as a $30 discount to whatever service you purchase. That might be a bundle of internet and wireless mobile voice," he says.

Carriers and ISPs looking to tap the ACP market can use SMS or text messaging to reach out to current prepaid wireless customers, too. Social media ads can also be effective because they can be microtargeted by age, sex, zip code, and other demographic details. Partnering with local and national stores is another solid strategy. For instance, AT&T Prepaid had success selling the EBB—the precursor to the ACP—on displays placed at the end of aisles in Walmart, says Wave7's Moore.

Finally, carriers and ISPs can look to partner with community groups, social services providers, and public entities such as local schools and libraries to provide marketing materials or community sign-up events. This type of groundswell and community discussion is important because lower-income consumers tend to rely on people they trust within their neighborhoods for product and services recommendations, Levin says. "If you're in a community that hits a tipping point, everybody in the community kind of gets it" and gets the service, he adds. One additional caveat: carriers and ISPs do need to keep in mind that there may be a language barrier and, for some, a literacy barrier. Adds Moffett, "It's quite hard to be online if you don't—or if you can't—read."

Navigating the Minefield

Despite there being potential benefits of the ACP for telecom companies, there are some risks, including logistical

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difficulties, such as having to build out networks in low-density markets. There's also the need to create new affordable products and offerings that will be inexpensive enough to lure people with access to the $30 credit without alienating other price-conscious consumers. In fact, many internet providers and carriers have already confirmed they would offer plans for $30 or less for those who qualify. Many have already launched. These offerings have speeds of at least 100 Mbps with no fees or data caps—an appealing deal for anyone. Carriers can avoid angering current customers who don't qualify for the ACP by creating new plans that still qualify as broadband but may not have the same speeds as higher-cost service offerings, says Moffett.

Another potential pitfall that many people don't want to talk about is that long-term funding for the program is not guaranteed, Levin says. He explains that the federal government, with its infrastructure money, intends to fill the funding gap between the capital cost of building out a network in a specific area and what the private market would typically invest on its own. The amount will be determined through a competitive grant process run by each state.

As an example, the 2020 Rural Digital Opportunity Fund auction demonstrated that the funding gaps vary greatly between areas.[10] In some areas, the funding gap was close to 100% of the needed capital, whereas it was in the single digits in other areas. All the companies will do a detailed analysis of what revenues they expect to receive to provide a return on the capital they will invest. The greater the revenue, the smaller the funding gap. But it varies from case to case, and nothing is set in stone.

"It would seem like it's a slam dunk for [carriers and ISPs] to sell an adjacent service, particularly if the government is giving the money," he says. "But there's a very simple reason for not going all in. When the money runs out and if there's no replacement, the providers are [in a bind]. Why? Because

> "Anything you can do to help this population afford their service, whether they've had it or not before the existence of the program, is a success," says Free Press's Joshua Stager.

politically, cutting off 10 million schoolkids who are low-income schoolkids just isn't something anyone wants to do. If Congress is going to live up to the commitment [to providing broadband for all], you're going to see much greater efforts to get people online. But until then, I think it's very tricky."

This problem is an issue especially when factoring in the costs of upgrading networks and equipment and, in the case of wired services, installing services in areas with very low populations. Keith points to Native Americans who live on Tribal lands as a good example. "In many cases, especially in the West, you're talking about huge areas of land that are pretty sparsely populated."

"The Navajo Nation is larger than 10 eastern U.S. states, and the population is [only] 167,000," he says. "For an operator, whether they are a cable or a telco operator or even a wireless operator, it's all about density. It's just an extremely expensive proposition for a telco or cable operator to provide service for people who are extremely far away from their central offices."

Despite these barriers, ISPs and carriers that don't offer an ACP and make their support broadly known may lose market share when it comes to their prepaid or current low-cost offerings and miss opportunities for new postpaid customers. They also risk being seen as digital discriminators. In addition, the ACP can help mitigate churn and create upsell and cross-sell opportunities.

Going forward, ISPs and carriers may want to consider assigning a specific team to handle ACP marketing and sign-ups to make sure that the messaging is cohesive and focused on the right prospects, says Huberman. "Obviously, passing a bill that can help 27% of the country afford internet is awesome. That being said, now who's responsible to make sure people actually sign up? There needs to be a metric of success to drive action. And if we don't have that, if we're not measuring how many people sign up for this, how many people get internet because of this, then we're not going to see adoption," he says. "In the United States, everyone should have internet. There are countries much poorer than the United States where everyone has easy access to the internet."

Free Press's Stager agrees. "Anything you can do to help this population afford their service, whether they've had it or not before the existence of the program, is a success."

Endnotes

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