



Before the  
Federal Communications Commission  
Washington, DC 20554

In the Matter of )  
 )  
Wireline Competition Bureau ) WC Docket No. 21-450  
Seeks Comment on the Implementation )  
of the Affordable Connectivity Program )  
 )

REPLY COMMENTS OF  
THE AMERICAN CONSUMER INSTITUTE CENTER FOR CITIZEN RESEARCH

The American Consumer Institute Center for Citizen Research (ACI), a 501(c)(3) non-partisan research and educational institute, with the mission to identify, analyze, and project the interests of consumers in selected legislative and rulemaking proceedings in matters that affect the consumers, respectfully submits these comments in the above referenced proceeding on the Commission's proposed rules, procedures, and practices for the newly established Affordable Connectivity Program.

As longtime advocates for policies that increase broadband access for all consumers, we commend the Commission's efforts to further extend broadband access to those who might not otherwise be able to afford it, as seen throughout the Emergency Broadband Benefit (EBB) and Lifeline programs. As such, we recommend a smooth and

efficient transition to the Affordable Connectivity Program (ACP) to continue the Commission's efforts to address the digital divide.

We do recommend the Commission, however, to be mindful of a few aspects of the transition process to ensure the long-term success of the ACP.

It is critical that the Commission sets a transition period that minimizes disruptions and prioritizes consumers. The scheduled launch of the ACP on December 31, 2021 presents several challenges, as it could negatively affect consumers. The Commission should provide a reasonable time period after adopting new rules for providers to implement the new requirements applicable to the ACP, which would ensure minimizing disruptions for consumers.

We urge the Commission to take any steps necessary to ensure that existing EBB customers do not lose their broadband service due to issues that might arise with the transition from one program to another.

Additionally, we urge the Commission to issue clear guidance that provides transparency while considering implementation concerns through the upcoming transition. It is critical that, during the transition process, all consumers receive clear and ample notice of the transition, that eligible consumers know about the ACP and what it entails, and get the help they need to enroll.

Last, the Commission should ensure the ACP specifically aims to connect communities of color, lower-income areas, and rural areas that are unserved and underserved.

We encourage the Commission to continue its efforts to bridge the digital divide and connect ALL consumers to affordable, high-quality options for broadband service. As such, the ACP's ability to be successful is highly dependent on the Commission's efforts to efficiently address and reconsider any aspect in the transition process that can disadvantage consumers.

Respectfully submitted,

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