

The Pitfalls of an Affordability Tier

A Single Affordability Tier Risks Trapping Low-Income Families in Worse Plans.

- Requiring ISPs to offer a specific low-income service tier either on a means-tested and subsidized basis, or else to all internet users – may be intended to ensure at least one good affordable option exists for struggling households, but the actual impact would be to trap these families into a plan that may either be too expensive or too slow to meet their needs.
- There is no single price or speed combination that is both affordable *enough* and fast *enough* to meet the needs of all low-income families, because these families have varying needs. Some may be satisfied with slower speeds as long as they are free-to-the-user, while others may seek out much faster tiers, even if those plans come with higher price tags post-benefit.
- Low-income households, like all households, deserve to have affordable access to the entire high-speed internet marketplace, rather than being confined to any single tier.

Setting the "Right" Price or Speed for a National Affordability Tier Is Not Feasible.

- ISPs have different cost models, meaning that what may be an appropriate price and speed combination for some may well be too little for some ISPs and a windfall for others. That's why setting a specific affordability tier does not mitigate the risk of overpaying providers for affordable service.
- Without collecting comprehensive data on broadband prices and costs, any attempts to set a nationally affordable price and universally appropriate speed must rely on guesswork.
- > Any effort to set a single speed and price point untethered to the actual costs of providing such service would face stiff political opposition from a variety of stakeholders.

A Flexible Benefit Serves People, Business, and Taxpayers Better Than a Specific Tier.

- Setting a price point that is too low may trap low-income families into plans that don't meet their needs, but setting a price point that is too high would raise the total cost of a subsidy program without any analysis of the net benefits. Increasing the cost to taxpayers by mandating higher speeds that not all families would see benefit from is poor public policy.
- Free Press Action endorsed *LIFT America* and the *Accessible, Affordable Internet for All Act*, which included billions in additional funding for the Emergency Broadband Benefit program. Some ISPs have called for \$15 billion in affordability support alone. These higher numbers are needed to get and keep disconnected people online for good, not just for a few years.
- ➤ To improve the EBB, the infrastructure package should require <u>all</u> internet service providers to participate in the program, and require providers to accept the benefit for <u>every</u> tier. This ensures maximum choice for users, flexibility for providers, and accountability for taxpayers.