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RE: *Wireline Competition Bureau Seeks Comment on Emergency Broadband Connectivity Fund Assistance, WC Docket No. 20-445*

Monkeybrains writes the Federal Communications Commission to provide comment on the implementation of the Emergency Broadband Benefit Program recently established by Congress in the Consolidated Appropriations Act, 2021.

In this comment Monkeybrains asks the Commission to cover the cost of donated residential service up to the amount established in the Act, to eliminate means-testing as much as possible in the EBB Program, to consider census geographic area poverty level as a default category for Program eligibility, and to cover several types of customer premises equipment (“CPE”) for reimbursement as well as routers sold to customers or distributed through alternative programs.

Another Corporate ISP, LLC, dba Monkeybrains (“Monkeybrains”) is a local fixed wireless internet service provider based in San Francisco, California. Monkeybrains was founded in 1998 and has 64 employees as well as two founder-partners. Monkeybrains currently serves more than 14,000 subscribers in the San Francisco Bay Area, charging residents \$35 per month for fast internet service with no hidden fees and no contracts. This is the Bay Area’s most affordable residential broadband service available without means-tested discounts.

Monkeybrains serves its community most notably through its partnership with the City and County of San Francisco to provide free internet at affordable housing buildings as part of the Fiber to Housing Partnership<sup>1,2</sup>, and with ShelterTech to provide internet in homeless shelters and SRO hotels as recognized in Commissioner Starks’ DOER Program awards<sup>3</sup>.

Monkeybrains asks the Commission to consider making EBB Program money available to cover the cost of providing service to a resident even if the provider offers an existing low-income service program at no cost to the resident. Making this money available to cover otherwise donated service would help such programs remain sustainable.

Monkeybrains is concerned that only the largest incumbent providers will be able to easily process reimbursement in the manner laid out in the EBB Program. Monkeybrains’ discount offerings are based on the already means-tested fact that a household is in a publicly assisted unit. We believe that further means-testing may be counterproductive to rapid roll-out of the EBB Program, and should be avoided to the greatest extent possible in order to quickly bring more unconnected households online. We are eager to provide services to the thousands of low-income households in our service area that are not

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1 San Francisco Department of Technology: Fiber to Housing <https://tech.sfgov.org/news/fiber-housing/>

2 Monkeybrains and Fiber to Housing: Eliminating Access Disparity  
[https://www.monkeybrains.net/MB\\_fiber\\_to\\_housing.pdf](https://www.monkeybrains.net/MB_fiber_to_housing.pdf)

3 COMMISSIONER STARKS ANNOUNCES 2020 DIGITAL OPPORTUNITY EQUITY RECOGNITION PROGRAM HONOREES <https://docs.fcc.gov/public/attachments/DOC-366874A1.pdf> 2020-09-14

based in publicly assisted housing. In order to ensure we can use the EBB Program effectively both the customer and the ISP should have as little eligibility-related overhead as possible.

The eligibility for Monkeybrains' existing programs involves residence in a publicly-assisted or deed-restricted housing unit, or being enrolled as student or faculty in the San Francisco Unified School District<sup>4</sup>. Monkeybrains would need the Commission to approve participation in the EBB Program through confirmation of residence, or through confirmation of public school enrollment.

The Commission may consider eligibility for the EBB Program based on recent poverty data at the census tract or census block level. The role of an ISP like Monkeybrains is to build permanent infrastructure that can benefit users into the indefinite future, not just to be a temporary stop-gap service provider. Using the EBB Program to encourage construction of last-mile infrastructure direct to residences in areas below a certain poverty threshold would have a long-lasting effect to close the digital divide among households below the poverty line. This policy would eliminate the need of a household to prove they are eligible for the EBB Program's benefits.

The EBB Program should cover the cost of CPE in one of the Program's reimbursement categories. Monkeybrains regularly installs two main types of CPE depending on the type of premises: rooftop fixed wireless radios, and in some cases G.hn or G.fast modems to provide gigabit speeds over twisted pair copper telephone wire. These types of equipment should be eligible for reimbursement by the EBB Program when an ISP includes the cost of equipment in installation, as Monkeybrains does.

The Act provides that "the term 'connected device' means a laptop computer, tablet computer, or similar device that is capable of connecting to broadband internet access service." Monkeybrains recommends that the Commission interpret this phrase to include wireless routers, which are capable of connecting to broadband internet access service and are often necessary for full use of broadband's capabilities in the home. In most cases routers are necessary to provide in-home Wi-Fi access and usually include firewalls to protect users. The Commission should consider routers to be prerequisites for the functionality of the laptop computers and tablet computers named in the Act. Monkeybrains regularly sells routers to our customers which are fully under their control upon sale, and our service instructions inform customers that they need a router to create a Wi-Fi access point in their home<sup>5</sup>. Including routers in the EBB Program may increase the number of customers who choose to buy a router from their ISP, reducing their need to spend time deciding on options on the retail market. The Commission should ensure that sales of connected devices to distribution programs run by public agencies, non-profits, and community mutual aid organizations are eligible for reimbursement.

Monkeybrains looks forward to the FCC's implementation of the Emergency Broadband Benefit Program. We are eager to do our part to make high-speed internet adoption affordable, sustainable, and useful to all of our neighbors in our service area.

Respectfully submitted,



Preston Rhea  
Director of Engineering, Policy Program  
Monkeybrains

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<sup>4</sup> <https://www.monkeybrains.net/sfusd>

<sup>5</sup> <https://www.monkeybrains.net/how-it-works.php#router>