Summary of Comments Received: 80 FR 6056

1. Jean Publi

This commenter objects to the proposed information collection, calling the Census Bureau "a very high priced costly fat cat bureaucracy," and asserts that the information to be collected "is already available with a little digging." The commenter maintains that "there is absolutely no reason to do this survey at this time."

We appreciate the need for government to operate efficiently and to focus information collections on gathering data not otherwise available. As the President's principal advisor on communications and information policies, NTIA closely monitors the availability of data related to computer and Internet use. NTIA has sponsored the Current Population Survey (CPS) Computer and Internet Use Supplement periodically since 1994, and we believe it to be one of the most valuable and comprehensive surveys of its kind in the United States, with perhaps the longest-running time-series. The CPS Supplement has a significantly larger sample size than most surveys, including nearly 130,000 individuals living in 54,000 households, with a survey design that enables state-by-state analysis. The only other regularly-administered national survey that details Americans' technology usage habits, sponsored by the Pew Research Center, has a much smaller sample size only capable of producing reliable statistics at the national level, and sometimes focuses on particular topics of interest as opposed to widespread time-series comparisons.[1] In 2013, the Census Bureau added three questions about computer and Internet use to the American Community Survey (ACS). However, these questions are limited to household-level analysis only and do not inquire about the applications people use online.[2] NTIA believes the CPS Supplement is a vital tool for research and policymaking in the Internet space, and we note that the collected data have been used in hundreds of academic studies.[3]

2. Inclusive Technologies et al.

Inclusive Technologies wrote a comment focused on gathering data on persons with disabilities, and asked others to sign on as supporters of the comment. We thank these commenters for their support of the CPS Supplement, and appreciate their feedback on the very important need to understand the barriers that Americans with disabilities face when trying to utilize the latest technologies. They are concerned that "previous collection efforts have not done enough to provide the data granularity necessary to elucidate disability-related factors in non-usage." In particular, the commenters ask for "more detailed information about specific features and assistive technology usage patterns (or lack thereof) among the various disability segments," and lament "a lack of data about how many people encounter what kinds of ICT barriers, in what environments of use, and how those potential users respond to barriers through assistive

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[1] Pew Research Center, "U.S. Smartphone Use in 2015," http://www.pewinternet.org/2015/04/01/us-smartphone-use-in-2015/.

[2] U.S. Census Bureau, "The American Community Survey," http://www.census.gov/acs/www/Downloads/questionnaires/2015/Quest15.pdf.

[3] Google Scholar search results, http://scholar.google.com/scholar?hl=en&as_sdt=1,9&as_vis=1&q=%22current+population+survey%22+computer+internet+NTIA.

technologies and other solutions." The commenters make five recommendations for this information collection.

The first recommendation is for "a greater focus on factors leading to non-usage." The commenters would like data that explain "why the remaining non-users are not signing up and logging in," and suggest that "questions here should be driven by previous studies, with clear hypotheses that can affect public programs that seek to expand the Internet circle." NTIA strongly agrees that there is a need to better understand why some Americans are not going online. Accordingly, NTIA has proposed a survey instrument that significantly expands on longstanding questions to households lacking home Internet users. While previous information collections only obtained a "main" or "primary" reason for a household not going online at home, the latest survey would record multiple reasons for non-use at home and also ask about reasons for non-use outside the home. Furthermore, the proposed information collection includes a question about whether non-using households would purchase Internet service if it were offered at a lower price, which may shed light on price sensitivity and could help clarify to what extent cost is a barrier to home Internet use. NTIA may consider further expansion of questions surrounding non-use in the future. Though as the commenters suggest, such questions would need to be informed by the results of previous research (including cognitive testing of any new questions).

Second, the commenters suggest "a question or series that explicitly asks whether the respondent (or anyone in the household) has any difficulty—or believes they may have a difficulty—that would interfere with their use of a computer or the Internet, including learning to use a computer or the Internet and specifically what that difficulty is." The main portion of the CPS, to which the proposed information collection would be added as a supplement, asks a number of questions about disabilities (the commenters refer to these as the "Washington Group" questions, referencing their origin). In general, NTIA relies on the demographic questions in the main CPS instrument to obtain information on disability status as well as other factors like income, education, and race. Due to the limited space and time allocated to the Supplement, we do not typically include additional demographic questions. Nevertheless, NTIA appreciates the commenters' point that certain difficulties that interfere with computer and Internet use are specific to the field and not covered by the main disability questions in the CPS. Unfortunately, any new questions aimed at addressing the issue would, as mentioned by the commenters, require extensive research beforehand. Such research cannot practically be completed prior to this information collection, but NTIA will consider and evaluate these issues when designing future editions of the CPS Supplement.

Next, the commenters urge the collection of individual-level data on computer and Internet use, noting that "surveys that ask only about household subscription and usage do not capture whether a household member with a disability also uses the Internet." NTIA agrees that individual-level data are extremely valuable for many purposes, including analysis of Internet use by persons with disabilities. In fact, the proposed information collection would continue and expand on NTIA's past practice of collecting computer and Internet usage data at the individual level, as well as at the household level. While the commenters maintain that this is an issue that "needs to be resolved by CPS methodologists prior to data collection," the CPS is designed to

produce reliable data on persons as well as households.[4] NTIA consistently takes advantage of this capability; we have gathered data on Internet use at the individual level in every CPS Supplement we have sponsored since 1998.[5] Because the Census Bureau also gathers disability data at the individual level, it is already possible to capture whether individual household members with disabilities use the Internet. The proposed information collection will continue this tradition and produce individual-level data on devices used, locations of Internet use, and specific online activities.

The commenters' fourth recommendation is to "clarify [the] exclusion or inclusion of both institutionalized and non-institutionalized residents" in the CPS, and "to extend as far as possible its definitions so that they include more people with disabilities." As the commenters note, the CPS only includes the non-institutionalized population in its sampling frame, so individuals in nursing homes, prisons, and other institutionalized settings are not included in the sample. NTIA understands the concern that this design choice excludes certain housing settings that are likely to include many persons with disabilities. The CPS sample design aims to "select a probability sample that is representative of the civilian noninstitutionalized population."[6] While ideally we would like to learn about computer and Internet use in institutionalized settings, this is simply not achievable through a supplement to the CPS, which is primarily designed to gather labor force data. Despite this characteristic, the CPS is a valuable vehicle for collecting information on computer and Internet use in the United States. As the commenters note, the CPS "is rightly the gold standard in US demographic data collection."

Finally, the commenters argue that "methods of collection limited to 'computer-assisted telephone interviewing and computer-assisted personal interviewing…' will automatically exclude many potential respondents who do not use voice communication, reject incoming calls from unknown callers, or prefer to avoid computer use situations for whatever reason." The Census Bureau employs multiple techniques to ensure inclusive information collection. As described in Census Bureau documentation, contact with sampled households begins with an introductory letter sent via postal mail. During the first month of a household's participation (as well as the fifth), a field interviewer visits the household in person to conduct the interview. During months-in-sample 2-4 and 6-8, most interviews are conducted over the phone; however this requires the respondent's approval. The "computer-assisted" aspects of the telephone and personal interviews apply only to the Census Bureau interviewers, not to the respondents. Interviewers use computers to record survey responses while gathering data through conversations with respondents. Continued in-person interviews are an option for those who prefer them.[7] This methodology has proven to be very effective; the CPS boasts "one of the highest response rates among government household surveys, averaging around 90 percent."[8]

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[4] For example, the Bureau of Labor Statistics (BLS), the primary sponsor of the main CPS, uses the gathered data to produce official labor force statistics such as the unemployment rate. BLS statistics are generally computed for individuals, rather than households. *See* http://www.bls.gov/cps/.

[5] *See, e.g.,* http://www.census.gov/prod/techdoc/cps/cpsoct10.pdf at '8-8'-'8-9,' '8-10' (specifically, questions NET2a, N2WHO, NET5a, and NET6).

[6] U.S. Census Bureau, *Current Population Survey Design and Methodology (Technical Paper 66),* p. '3-6,'

[7] Ibid, Chapter 7.

[8] U.S. Census Bureau, "Current Population Survey (CPS) Frequently Asked Questions," https://www.census.gov/cps/about/faq.html#Q6.

NTIA appreciates the commenters' thoughtful discussion of the need for enhanced data on Internet use by persons with disabilities. We are pleased that the proposed information collection already addresses some of these important concerns, such as the need for more information on reasons for non-use of the Internet as well as for individual-level data. While it is not feasible to make extensive changes to the proposed information collection at this time, we will consider the commenters' suggestions when designing future editions of the CPS Supplement.

3. Information Technology & Innovation Foundation (ITIF)

In its comments, ITIF suggests three categories of additional questions to be added to the CPS Supplement, and recommends changes to two proposed questions and to the structure of the series of questions on online activities. We appreciate ITIF's thorough review of the proposed information collection and its suggestions for additional questions. In general, it would not be feasible at this stage to add additional questions to the survey instrument, which already contains 61 questions and requires an average of ten minutes per household for response—a duration that approaches the Census Bureau's recommended length limit for a CPS supplement. Any new questions must also be subjected to cognitive testing, which would not be possible prior to the proposed administration of this survey in July 2015. That said, NTIA is pleased to review ITIF's proposed questions and consider them for inclusion in future editions of the CPS Supplement.

The first set of additional questions recommended by ITIF is aimed at better understanding "the true economic impact of broadband deployment and access, including the increased productivity that comes from citizens using e-government services." Specifically, the commenter wants respondents to specify how much money they spent on goods or services ordered online, what proportion of that amount was spent on physical goods delivered to the household, how often respondents used websites for rating consumer goods or services, and how often they used government services online. While NTIA would want to further research and test these questions, particularly the ones that require respondents to estimate dollars spent, we recognize the potential value of gathering such data. Adding questions such as these in the future may open up new research opportunities, and in the meantime, we note that parties interested in e-commerce may benefit from the Census Bureau's existing E-Stats reports and related studies.[9]

ITIF also recommends adding two questions regarding what it characterizes as "important inhibitors of the Internet economy." First, the commenter proposes asking how often respondents "accessed movies, music, or other digital products or services" from a website that the respondent suspects did not have distribution rights for that content. NTIA appreciates the need to gather data that could help inform policies aimed at protecting intellectual property online. However, we are skeptical that respondents would provide accurate and thorough information to a government agency regarding whether they have engaged in potentially illegal activity. The CPS is a voluntary survey, and while the Census Bureau emphasizes the confidential nature of responses, this kind of question may increase the risk of inaccurate information, or refusals to participate. Additionally, ITIF suggests a question about how often respondents "used software to block online advertisements." We agree that data on the use of such software could be of interest, though we suspect respondents may have difficulty answering accurately. Most modern web browsers include the ability to block so-called "pop-up" advertisements,[10] and it is not clear whether respondents would think of web browsers as software used to block advertisements.

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[9] U.S. Census Bureau, "E-Stats – Measuring the Electronic Economy," http://www.census.gov/econ/estats/.

Moreover, applications that block online advertisements frequently are also aimed at increasing security, protecting user privacy, or avoiding excessive use of computing power.[11] This type of question therefore would require testing and adjustment prior to use.

ITIF's final suggestion for additional questions is aimed at exploring "how households use mobile broadband and how this differs from fixed broadband." The commenter is concerned that "the survey fails to draw a distinction between the services that respondents access on mobile broadband compared to the services they access on fixed broadband." To remedy this perceived shortcoming, ITIF suggests asking respondents separately about the online activities in which they participate while using mobile Internet services and while using fixed Internet services. NTIA appreciates this suggestion, as the question of to what extent Internet users behave differently while using mobile networks and fixed networks is an important one. Unfortunately, our experience suggests there may be substantial barriers to obtaining accurate data in this area. Cognitive testing and reports from the field from both previous editions of the CPS Supplement and the new computer and Internet use questions on the American Community Survey (ACS) suggest that many people have difficulty identifying the exact technologies they use to get on the Internet. This issue is what led us in the proposed information collection to combine different types of fixed technologies (e.g., cable, DSL, and fiber optic service), and to substantially revise language describing mobile broadband in our question about the types of technologies households use to go online. Furthermore, given the prevalence of Wi-Fi networks, users are not always certain as to when they are connected to the Internet via a fixed or a mobile network. Therefore, any attempt to distinguish online activities performed across these two modes would require extensive research and testing.

In addition to recommending additional questions, ITIF suggests revising two proposed questions related to online privacy and security. The commenter is concerned that "the proposed privacy questions will not help policymakers make better decisions or aid critical analysis." The commenter first discusses PSPRE, which asks respondents whether privacy or security concerns have stopped them from undertaking specific activities online during the past year (with a list of categories read to the respondent). ITIF asserts that "there is no attempt to differentiate between significant and insignificant privacy and security concerns" in this question, and proposes modifying the question to ask whether privacy or security "substantially impeded" the respondent's "ability" to undertake the activities at issue. NTIA respectfully disagrees with both the characterization of the proposed question and with the suggested modifications. By introducing the concept of "substantiality," there would be an increased risk of inconsistent responses to the question. Further, based on other polling and research, it is not uncommon for individuals to express concerns about privacy and security. However, concerns that are great enough to stop someone from taking one of the specified actions are, in our view, higher than "insignificant." Other aspects of the commenter's proposed language would also be open to differing interpretations, and could either result in less-significant privacy concerns being cited

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[10] *See, e.g.,* http://windows.microsoft.com/en-us/internet-explorer/ie-security-privacy-settings#ie=ie-11&pop-up_blocker (Internet Explorer), https://support.mozilla.org/en-US/kb/pop-blocker-settings-exceptions-troubleshooting?redirectlocale=en-US&redirectslug=Pop-up+blocker (Firefox), https://support.google.com/chrome/answer/95472?hl=en (Chrome), https://support.apple.com/kb/PH19284?viewlocale=en_US&locale=en_US (Safari).

[11] For example, FlashStopper prevents Adobe Flash videos from automatically playing on Firefox, enabling users to choose whether they want to play particular videos. *See* https://addons.mozilla.org/en-us/firefox/addon/flashstopper/.

(because a behavior was "impeded" rather than "stopped"), or in almost no affirmative answers at all (if "ability" is interpreted literally).

ITIF also expresses concerns about PSCON, asserting that the question "uses vague language and fails to put the respondent's concerns about privacy and security in context and assess their relative importance." While the question, as drafted by NTIA, would ask respondents what concerns them the most when it comes to online privacy and security risks, the commenter would prefer to "ask respondents about Internet concerns overall… so that respondents can discuss affordability, ease of use, or other issues that may be important to them" in addition to privacy and security, "and then rank those concerns." While this is an interesting suggestion, it resembles more a new line of questioning rather than a modification of PSCON, which is aimed specifically at assessing the most pressing concerns Americans have about privacy and security online. Alternately, ITIF recommends at a minimum that "the response should allow respondents to differentiate between items of high and low concern" within privacy and security. In asking households what concerns them "the most" about privacy and security risks, NTIA is aiming to gather data on those risks which are of high concern to Internet users. This is part of the reason why interviewers would *not* read response options for this question (thereby requiring respondents to identify concerns on their own, rather than responding to a list of prompts). The interviewer will have the ability to check off "no concerns" when respondents do not indicate any particular areas of concern. This approach allows the collection of data on what concerns (if any) are "top of mind" for the respondents, without inviting respondents to endorse (or not) any particular concerns.

Finally, ITIF suggests altering the proposed questions about online activities to rank how often respondents use these applications and services, as opposed to just learning whether they use them or not. We agree that such additional detail could be of use to researchers and policymakers, and will consider it for future editions of the CPS Supplement. Unfortunately, a side effect of this methodology would be to significantly increase the amount of time it takes for respondents to complete the survey. It may also increase difficulty and reduce the accuracy of proxy response, which takes place when the randomly-selected Internet user in the household for the series on online activities is not the household respondent.

Although we disagree with some of its recommendations, NTIA thanks ITIF for its extensive comments on the proposed information collection. The commenter has supplied us with a number of good suggestions for additional questions that can be considered for future editions of the CPS Supplement.