



## OFFICE OF THE COUNTY SUPERINTENDENT

August 24, 2020

JUDY D. WHITE, Ed.D.

Dear California Broadband Council Members,

On behalf of the Riverside County Office of Education (RCOE) and the 23 public school districts in Riverside County, thank you for the opportunity to provide public comment as your Council embarks on the development of a new State Broadband Action Plan. This new plan represents an outstanding opportunity to ensure that equity is achieved in the ability of all California students in the public K-12 system to have access to devices and connectivity.

### Background and Overview

In the 2019-20 school year, Riverside County school districts served more than 430,000 students. More than 280,000 of those students qualified for Free and Reduced Price Meals, and nearly 75,000 were English learners. When California schools closed in March as a result of the COVID-19 pandemic and moved to provide educational services via remote (distance) learning, it was our experience that these students – those with the greatest needs, in most instances – were the most disadvantaged in terms of their ability to access distance learning, simply because of the digital divide.

Over the ensuing months, some progress has been made. Many school districts are utilizing funding from the federal CARES act, as well as the funding provided in the State Budget for mitigating learning loss, to provide devices and connectivity to their communities. Wireless providers have also become partners with schools by providing discounted rates to increase the number of homes with access to the Internet.

However, as we begin the 2020-21 school year, myriad challenges to providing equitable access remain. Our school districts are unable in many areas to provide connectivity, simply because wired and wireless providers do not offer current services in those regions. We are currently surveying our school districts to determine exactly where our students do not have access.

Our overall goal is to ensure that every student in Riverside County, regardless of their circumstances, has the opportunity to fully engage in distance learning. The ability to do so will pay dividends far beyond the current crisis in which we find ourselves. It is in that spirit that we respectfully offer the following recommendations as you proceed with the plan.

### Recommendations

**Minimum Broadband Speed Goal.** Governor Newsom’s Executive Order N-73-20 (hereafter referred to as “Governor’s EO”) directs state agencies to pursue a minimum broadband speed goal of 100 megabits per second download speed. As the council prepares a roadmap towards achieving this goal, we request you to consider that California students are not just consumers of technology, but creators. Because of that, particularly in the current environment where education is being provided almost exclusively via remote learning technology, **it is critical that the council consider *upload* speeds as well as *download* speeds, and we would recommend pursuing a minimum upload speed of 100 megabits per second to match the EO’s recommendation for a download speed of that level.**

Determining Need and Setting Priorities. The Governor's EO requests the California Public Utilities Commission to collaborate with the California State Transportation Agency and other relevant agencies to lead mapping and data efforts to determine areas of greatest need. **While both CPUC and CSTA are able to determine need based on which general areas do not currently have access, we request that the council consider a role for County Offices of Education in determining the need for families with children in school. COEs are well placed to assist in determining the specific educational needs of families within the regions under their jurisdiction.** For example, the Riverside COE is currently surveying school districts in the county to identify areas where students do not have access to connectivity.

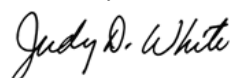
Further, as the Council develops priorities for targeting areas in which to provide further access, we request that the number of families that have students in school are included in the criteria by which those decisions are made.

Consider Wireless Infrastructure Solutions in the Plan. The Governor's EO directs the California Department of Technology, in collaboration with the Department of General Services, to seek opportunities to leverage the State's contract authorities as resources to further broadband access. Further, the EO directs DGS to provide an inventory of state property for possible use for broadband infrastructure. As this work commences, we respectfully request the council to consider the following:

- **Determine the amount of wireless/cellular network space that is available, so that local educational agencies (school districts, county offices of education, charter schools) and other local governments are able to create their own wireless/cellular networks.**
- **As DGS is providing an inventory of property available for possible use for broadband, consider existing wireless/cellular frequencies that are available for use and lease by educational entities. Based on our work with school districts in Riverside County, we believe the return on investment for a school district (or group of districts) to establish and maintain LTE towers rather than provide mobile hot spots for their students and families would be met in less than ten years.**

In conclusion, we thank you for your consideration of our requests, and look forward to engaging with the council in the weeks and months to come. If you have any questions regarding this memorandum, please do not hesitate to directly contact Eric Calderon, RCOE's Chief Technology Officer ([ecalderon@rcoe.us](mailto:ecalderon@rcoe.us)), and Jeff Vaca, RCOE's Chief Governmental Relations Officer ([jvaca@rcoe.us](mailto:jvaca@rcoe.us)).

Sincerely,



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Riverside County  
Superintendent of Schools