

From: CHASE, BRIAN
To: [CA Broadband Council](#)
Cc: SANTANA, SUSAN I; MURILLO, ARMANDO
Subject: Draft California Broadband for All Action Plan
Date: Friday, November 20, 2020 11:43:35 AM
Attachments: ATT Letter to the CA Broadband Council 11-20-2020.pdf

To the California Broadband Council:

I am writing to share the attached letter from Susan Santana, AT&T Vice President - Legislative Strategy, pertaining to the Draft California Broadband for All Action Plan.

Best regards,

Brian Chase

Director of Public Affairs

AT&T State Legislative & Regulatory Affairs



Susan I. Santana
Vice President
Legislative Strategy

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November 20, 2020

Ms. Amy Tong
Director, California Department of Technology
1325 J Street, Suite 1600
Sacramento, CA 95814

Subject: Draft California Broadband for All Action Plan

Dear Ms. Tong,

I am writing this letter in response to the California Broadband Council's Draft California Broadband for All Action Plan. Thank you for the opportunity to comment on this draft, and for your continued commitment to addressing broadband challenges across the State. AT&T shares your commitment to finding solutions to the digital divide in California.

Now more than ever, ensuring broadband access for all Californians is a critical public policy objective. The Draft Action Plan correctly recognizes that this objective includes two critical components: broadband availability and broadband adoption (e.g. - devices, digital literacy, training, etc.). While broadband adoption has been growing over the last two decades, a significant segment of the population still does not subscribe to broadband, even where it is available. Closing this gap in broadband adoption remains a critical component in achieving the goal of universal connectivity.

As you finalize the Draft Action Plan, AT&T urges the Broadband Council to consider the following recommendations:

1. As the State reviews its funding goals for closing the digital divide, we urge policymakers to consider appropriating state general funds to pay for any state broadband funding programs. Services to close the digital divide benefit all California residents, and resources to support those services should not rely on surcharges, fees, or taxes placed solely on a dwindling base of telecommunications customers.
2. The Action Plan states that "the market underserves poor, rural, black and brown communities" (Page 7) as a Core Challenge and references a "CPUC analysis" of AT&T and Frontier networks which "showed a clear inverse relationship between household income and principle service quality metrics such as out of service repair intervals." While AT&T fully recognizes the need to do much more to close the



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digital divide in low income areas and underserved communities, and strongly supports the development of appropriate solutions to close these gaps, the efficacy of these solutions is entirely dependent upon the proper diagnosis of the underlying problems. Towards that end, the Draft Plan should be revised to eliminate the unsupported reference to the “CPUC analysis of AT&T and Frontier networks.” These references are unfounded and rely on a report prepared by an outside consultant that has yet to be formally considered or adopted by the CPUC. Given that all parties have yet to respond to the opinions in the report, and the CPUC has yet to act and decide the issues, it’d be premature to treat the report as a CPUC analysis. We respectfully request that the unsupported reference to AT&T and Frontier networks be removed from the Action Plan.

3. AT&T stresses that the Broadband Council’s report should elevate the issue of closing the digital divide in low income and rural communities above mere allegations and opinions. Instead, the Council should seek a data driven diagnosis of the underlying causes of the digital divide for which proper solutions can be sought and developed. Only then can we collectively achieve greater access to and adoption of broadband services across California.
4. The Draft Action Plans appears to make sweeping and unsupported conclusions about a lack of competition in the broadband market and makes vague statements about prices that otherwise would require proper and objective analysis. In light of significant increases in competition and decreases in prices over the years, we recommend that the Action Plan’s market assertions be grounded in economic analysis and data-driven goals in order to accurately guide policymaking for the state, consistent with the Executive Order’s direction.
5. Increasing broadband availability and capacity will require increased financial support, not regulation. By raising the cost of providing broadband and ultimately the cost to consumers, increasing regulation would do just the opposite. We urge overall regulatory restraint, especially in light of the fact that broadband is an interstate information service that is subject to national regulation by the FCC, not a patchwork of state regulations.



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AT&T shares your commitment to finding solutions to the digital divide in California. As part of this commitment, we recently announced that AT&T is offering schools discounted wireless data plans with free Wi-Fi hotspots as part of our \$10 million education commitment to help underserved communities across the country. Under this low-cost offer, schools can migrate existing AT&T lines or activate new lines for students and teachers on a qualified unlimited wireless data plan and content filtering service for \$15 a month, with the additional option of an AT&T Moxee hotspot at no cost after bill credits. We are proud to offer solutions such as these for schools to help close the homework gap and support remote learning for teachers.

Thank you for your support in helping to provide internet access to California students and bridge the digital divide. Please consider us a resource in the months ahead -- AT&T looks forward to continuing to work with you.

Sincerely,

A handwritten signature in black ink that reads "Santana".

Susan Santana