

From: Alejandra Duran
To: [CA Broadband Council](#)
Subject: Broadband for All Action Plan
Date: Wednesday, November 18, 2020 9:23:13 AM
Attachments: NGCA Public Comment CBC State Action Plan.pdf

Good Morning,

On behalf of NextGen California, please find the attached comments letter related to the Broadband for All Action Plan.

Thank you,

Alejandra Durán
Weideman Group, Inc.

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November 17, 2020

Amy Tong, Chair
California Broadband Council
1325 J Street, Suite 1600
Sacramento, CA 95814

RE: GOVERNOR'S EXECUTIVE ORDER N-73-20, STATE BROADBAND ACTION PLAN

Dear Chair Tong,

NextGen California applauds the California Broadband Council's (CBC) efforts to comply with Governor Newsom's Executive Order N-73-20 and create the State Broadband Action Plan (Action Plan). One of NextGen California's policy and program priorities is to ensure that high speed, affordable Internet service is accessible to all Californians. We write to recommend key program elements we consider essential to the State Broadband Action Plan.

The pandemic has dramatically exposed California's lack of universal Internet connectivity and its negative rippling effects that are affecting every aspect of our lives. California's state government, in conjunction with the private and non-profit sectors, must develop solutions to address the high speed Internet needs of millions of our residents who now need to participate in telehealth, teletraining, and telebusiness services as well as students who are now participating in distance learning. The lack of universal connectivity also results in marked disadvantages and inequities for millions of school children, college students, families, and businesses in urban, tribal and rural communities across our state. As the draft Action Plan rightly notes, universal access to high-speed Internet is integral to all aspects of California's economic prosperity.

The following recommendations will help achieve the vision of closing the digital divide and delivering high speed Internet to all Californians -- mapping of areas of need; deploying the most appropriate technology; and adopting affordable broadband plans.

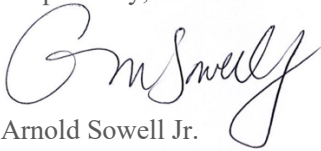
- **Infrastructure:** To address the areas where broadband access is lacking or insufficient, the Action Plan must solve issues of connectivity, service, and devices. Such solutions will also require significant collaboration with the federal government.

- The Action Plan should build on the limited data section. In order to deploy the needed Internet infrastructure, the state must have an accurate map of the current broadband network, the areas lacking broadband service, the speed of these various connections, state-owned rights of way, middle and last mile broadband infrastructure, and other public and private broadband network infrastructure.
 - Deployment must target rural, urban, and tribal areas that are unserved or underserved to achieve comprehensive broadband accessibility. Historically redlined and underserved areas must be identified and these areas must be a priority for infrastructure delivery.
 - As infrastructure build out is planned, consideration must also be given to how customers are expected to connect to the available services. Further, even more consideration must be made to ensuring households and especially students have personal devices that are able to connect and utilize the broadband access in their neighborhoods.
 - Technology neutral policies are preferred so solutions can be tailored to specific community needs and to ensure adaptability to future innovations in connectivity technology.
 - Recognize the importance of the collaboration between the public and private sectors to understand current and future broadband technology opportunities. Also, the need to formally advocate for federal actions -- funding, changes in e-rate policy, and the loosening of regulation at the Federal Communications Commission (FCC).
- **Adoption:** We know that one of the major obstacles for families not subscribing to home broadband is cost. For some households, low-cost plans are still beyond their financial reach. The state should weigh solutions to assist communities that continue to face the dual issues of poverty and the digital divide.
 - Promotion of affordable Internet plans with a focus on awareness and accessibility should be a collaboration between Internet service providers (ISPs), state and local governments, and community based organizations.
 - Access to these low-cost or subsidized plans should be user friendly and eligibility requirements should be streamlined. Anecdotal evidence has found that in order to sign up for some low-rate plans, customers could only do so online. Further, college students should have access to low-rate plans as many have no home to return to during this pandemic or have multiple family members at home accessing Internet services. ISPs should also share data on the adoption rate of these low-cost or subsidized Internet plans so that the state can have the necessary information to target areas with the most need.

- These low-rate or subsidized plans should also be offered at high-speeds so that households can meet their daily needs such as multiple video conference calls between working parents and distance learning students. These plans should also come with no data caps.
- **Support Services:** The digital divide is not a new problem facing California and for many households the sudden need to connect online for work, school, health, business, and mental health due to the pandemic also highlights the need to provide digital literacy skills.
 - Educators across the academic spectrum need training and support services as they learn to adapt to an online platform. Teachers and professors should not also become the expected technical support for their students.
 - Families also need support to build digital literacy skills and understand how to protect their privacy online. Technical support and digital literacy skills should be provided to students and their families.

Closing the digital divide will result in increased economic activity, improve social equity, advance educational opportunities, and create millions of good paying jobs. These are the jobs required to build, expand, and maintain universal Internet connectivity; the jobs that will generate new economic opportunities; and the jobs that will help future proof the California economy. NextGen California is committed to advocating for and advancing progressive policies, partnerships and programs that strongly support a fair, equitable, and prosperous California for all. The above recommendations will help ensure that the state's Action Plan equitably pursues its vision to deliver high speed, affordable Internet to all Californians.

Respectfully,



Arnold Sowell Jr.

Executive Director, NextGen California