

From: Beck, Kate
To: CA Broadband Council; Ungson, Chris; Johnson, Ana Maria; Ledesma Rodriguez, Raisa Public
Subject: Advocates Office Comments on California Broadband Council's Broadband Action Plan
Date: Friday, November 20, 2020 8:40:56 AM
Attachments: Cal Advocates comments to California Broadband Council's Broadband Action Plan.pdf

To Amy Tong and the California Broadband Council,

Please find attached the Public Advocates Office's written comments on California Broadband Council's Broadband Action Plan outline and draft.

Kate Beck

Public Utilities Regulatory Analyst

California Public Utilities Commission, Public Advocates Office





Public Advocates Office

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, California 94102

<http://www.publicadvocates.cpuc.ca.gov/>

November 20, 2020

Amy Tong, Chairperson
The California Broadband Council
1325 J Street
Suite 1600
Sacramento, CA 95814-2941

Subject: Public Advocates Office's Comments on California Broadband Council's Broadband Action Plan Outline and Draft

INTRODUCTION

The Public Advocates Office at the California Public Utilities Commission (Cal Advocates) appreciates the opportunity to submit these comments on the California Broadband Council's Broadband Action Plan outline, released on October 23, 2020. Cal Advocates is a legislatively created independent organization within the California Public Utilities Commission (CPUC) that advocates for consumers to obtain the lowest possible rates for service consistent with reliable and safe energy, water, and communications services.¹

Cal Advocates commends the California Broadband Council on developing a comprehensive Broadband Action Plan outline that recognizes the significant and multiple ways in which Californians rely on broadband for their health, safety, education, work, and wellbeing. In order to reflect the comprehensive approach necessary to bring affordable, reliable and high-speed broadband access for all Californians, Cal Advocates recommends the California Broadband Council:

- Expand the Broadband Action Plan's vision to include bringing broadband access to anchor institutions, including publicly-funded health and safety institutions, schools, libraries, and community-based organizations; and
- Recognize that backup power in broadband networks is a necessary component to ensure Californians have reliable broadband service during emergencies and power shutoffs.

Cal Advocates is still reviewing the Broadband Action Plan draft that the California Broadband Council issued on November 17, 2020. However, Cal Advocates wishes to point to these issues that are in the recently released action plan draft or outline.

¹ See Pub. Util. Code § 309.5(a) and (b).

RECOMMENDED MODIFICATIONS TO BROADBAND ACTION OUTLINE AND PLAN

The California Broadband Council should change the Broadband Action Plan’s vision to include anchor institutions.

The proposed vision in the outline focuses on broadband access at business and residences: “All Californians must have access, both in their places of business and residence, to affordable, reliable, high-speed internet, devices and skills training to ensure equity – the universal ability to engage in all aspects of social and economic opportunity.”² The vision in the Broadband Action Plan draft focuses on broadband access only for residences: “For California and Californians to thrive, we envision a future in which all Californians have affordable high-performance broadband available at home with the devices and skills to unlock opportunities through digital inclusion.”³ Californians also need reliable, affordable broadband access and devices that connect to the Internet at key anchor institutions, including public health and safety institutions, schools, libraries and community-based organizations in order to work, go to school, participate in civic life, and access healthcare and social services.

Broadband availability at anchor institutions is critical to the operations of these institutions and to the health, safety and wellbeing of the communities they serve. Anchor institutions do not only act as important resource centers for people who do not have broadband at home, but also to people who are homeless or who do not feel safe in their homes. Anchor institutions also act as evacuation centers during emergencies, times in which reliable, resilient communications service is critical for the safety of the community.

Cal Advocates suggests that the California Broadband Council change the Broadband Action Plan vision to include anchor institutions, in addition to households and businesses. The need for affordable, reliable broadband at these institutions is addressed in the Broadband Action Plan outline, and the vision should reflect this need.⁴

The California Broadband Council should recognize that backup power in broadband networks is a necessary component to ensure Californians have reliable broadband service during emergencies and power shutoffs.

The importance of backup power was included in the Broadband Action Plan outline, which states that broadband providers need to be encouraged to harden their services using backup power in order to ensure Voice over Internet Protocol (VoIP) is reliable during public safety power shutoff (PSPS) events.⁵

This concept should be incorporated into the Broadband Action Plan. The Broadband Action Plan draft mentions the importance of broadband network resilience and redundancy in California, stating that “[g]iven progressively worsening fire seasons and a changing climate, there is a risk that broadband access may fail due to power shut offs or damage done to fragile,

² California Broadband Council, Broadband Action Plan outline, p.2.

³ California Broadband Council, Broadband Action Plan, p.9.

⁴ The need for broadband access at anchor institutions is noted in the Broadband Action Plan outline on pp. 5, 7 and 10.

⁵ California Broadband Council, Broadband Action Plan outline, p. 6.

legacy infrastructure”.⁶ However, the Broadband Action Plan draft does not mention the importance of backup power in broadband networks in order to ensure communities have continuous, reliable access to emergency information and telecommunication services. Due to limited mobile and wireline phone service in several parts of California, many communities solely rely on broadband as their phone service (through VoIP) and as a way of receiving information during emergencies.⁷ Backup power is critical to ensuring communities’ safety and wellbeing during emergencies and power shutoffs. Cal Advocates recommends including backup power in the Network Resilience and Redundancy section of the Broadband Action Plan as the Broadband Council originally had in the draft outline.⁸

CONCLUSION

Cal Advocates appreciates this opportunity to provide comments on California Broadband Council’s Broadband Action Plan outline. These suggestions aim to ensure that the plan reflects the comprehensive approach necessary to address broadband access and adoption issues for all Californians.

If you have any questions about the above proposals, please contact Kate Beck, at [REDACTED] or Ana Maria Johnson at [REDACTED]

Sincerely,

/s/___Chris Ungson_____

Chris Ungson
Deputy Director for the Public Advocates

⁶ California Broadband Council, Broadband Action Plan, p.7.

⁷ See Public Comments submitted to the Emergency Disaster Relief Proceeding, Rulemaking (R.)18-03-011, https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5_PROCEEDING_SELECT:R1803011.

⁸ California Broadband Council, Broadband Action Plan, p. 7.