

From: Mei Kwong
To: [CA Broadband Council](#)
Subject: Submission of Comments
Date: Friday, November 20, 2020 9:31:33 AM
Attachments: Coalition Broadband Plan Comments FINAL.pdf

On behalf of the California Telehealth Policy Coalition, I am submitting the attached comments for the broadband for All Action Plan. Please let me know if you have any questions.

Thank you.

Mei Kwong

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To: California Broadband Council
From: California Telehealth Policy Coalition
Date: November 20, 2020
Re: **Comments on the Draft California Broadband for All Action Plan**

The California Telehealth Policy Coalition thanks the California Broadband Council for the opportunity to provide public comments on the draft California Broadband for All Action Plan. As a group of over 80 organizations dedicated to advancing telehealth policy in California, we recognize the key role that broadband and internet access play in connecting Californians to the care they need, especially during the pandemic when telehealth is playing a critical role in keeping Californians safe and healthy.

We respectfully submit the following comments regarding the California Broadband for All Action Plan:

1. Include detail on broadband access and usage in the health care context in descriptions of the current state of broadband

The Coalition thanks the California Broadband Council for describing in the notes on page two of the California Broadband for All Action Plan that health care services are critical ones that should be mentioned and woven in throughout the California Broadband for All Action Plan. We strongly support that the Council include specific sections on broadband access for health care, specifically in the sections “Broadband in California Today.” The Public Policy Institute of California reports that only 59% of rural households in California have access to broadband speeds of at least 25mbps/2mbps.¹ This means that over 40% of rural Californians often lack access to broadband speeds that can provide the minimal bandwidth required to stream live video telehealth visits, visits which are often conducted while other household members are using the internet for education and work purposes. Yet little data exists as to broadband connectivity for health care providers, particularly small independent physician associations and medical groups in rural areas, and providers looking to provide telehealth services from their homes.

We specifically request that the Council note that there is a dearth of data on health care provider access to broadband, and the speeds at which they are able to access it. As health care providers and their patients in the state continue to use telehealth well past the end of the pandemic, collecting this data will provide meaningful benchmarks as to health care providers’ ability to provide telehealth services, from hospitals, medical offices and the home.

¹ Justin Goss, Courtney Lee, Niu Gao. Just the Facts: California’s Digital Divide. Public Policy Institute of California. <https://www.ppic.org/publication/californias-digital-divide/>. Published March 2019. Accessed November 5, 2020.

2. Expand the list of principles to account for more issues such as infrastructure, access and equity

The Coalition is excited to see that the Council has proposed the inclusion of guiding principles for the California Broadband for All Action Plan. As a coalition that has worked over the course of 2020 to refine our guiding principles on broadband policy, we recommend that the Council consider adopting guiding principles that can stand the test of time, and avoid ones that are targeted only to meet technological and human capabilities at this time. In addition, we suggest that the Council develop principles not just related to broadband standards, but also in relation to broadband policy more generally.

To provide detail, we suggest the Council consider adopting the draft principles the Coalition has developed this year.

- **Broadband should be treated as a utility:** policies should treat broadband as a utility necessary for Californians to access health care and other services and needs in the 21st century
 - **Robust infrastructure should be in place to serve all Californians:** policies expand the physical infrastructure needed to bring internet access to underserved populations and geographies
 - **Californians should have equitable access to broadband:** policies ensure increased access to broadband for underserved communities, both urban and rural
 - **Broadband should be affordable:** policies should support making high-quality internet access affordable for all Californians, including the use of subsidies and/or price setting
 - **Government should fund broadband projects that rely on best-in-class, high-speed standards:** policies ensure that infrastructure, accessibility and affordability reinforce the need for high-speed, best in class technologies
- 3. Include work activities that specifically address health care providers and patient involvement in broadband delivery, adoption, reliability and digital literacy**

Lastly, we recommend that the Council include activities in “Actions We Will Take Over the Next 6 and 18 Months” that specifically address the needs of health care providers and California patients. As stated above, work remains to be completed to ensure that the needs of health care stakeholders are recognized in the state planning process.

We request that the California Broadband Council make the following changes to the California Broadband for All Action Plan:

- In the subsection “How we can deliver more access to high-speed internet,” add: “Within 6 months, create programs to support health care provider access to the internet in medical offices and at home.”
- In the subsection “How can we drive adoption,” add: “Within 18 months, provide technical assistance through these programs to help health care providers gain connectivity to broadband.”
- In the subsection, “How can we boost reliability,” add: “Within 6 months, begin collecting survey and other data from health care providers and patients in various geographic locations to monitor their rates of broadband access, usage and connectivity reliability on an ongoing basis.”
- In the subsection, “How can we improve digital literacy skills,” include health care provider, health plan and patient advocacy groups to the list of stakeholders under bullet 1 for inclusion in sustained, regular meetings.
- In the subsection, “How can we improve digital literacy skills,” ensure that health care providers and patients are specifically included in digital skills training programs, regardless of the programs’ linkage to economic recovery efforts.

Conclusion

The California Telehealth Policy Coalition thanks the California Broadband Council for the opportunity to provide public comments on this first draft of the California Broadband for All Action Plan. We look forward to providing further comment. Please direct any questions to Mei Kwong, Executive Director of the Center for Connected Health Policy, at [REDACTED] or to Robby Franceschini, at [REDACTED]