

From: Andrea Ball
To: [CA Broadband Council](#)
Subject: Comments on the Updated State Action Plan on Broadband for All
Date: Friday, November 20, 2020 1:11:19 PM
Attachments: CVECLetterCABroadbandCouncil.11.20.20.pdf

Attached is a letter on behalf of the Central Valley Education Coalition providing comments on the Updated Draft California Broadband for All Action Plan. Thank you for the opportunity to share these comments and for all of the work of the Council and staff on this important project.

Sincerely,
Andrea Ball

Andrea Ball
President
[Ball/Frost Group, LLC](#)





Central Valley Education Coalition

November 20, 2020

Fresno County, including:
County Office of Education
15 Elementary School Districts
2 High School Districts
16 Unified School Districts

Amy Tong
Chair, California Broadband Council

*submitted via e-mail to
CABroadbandCouncil@state.ca.gov*

Kings County, including:
County Office of Education
10 Elementary School Districts
2 High School Districts
2 Unified School Districts

Dear Chair Tong and Members of the Council:

On behalf of the Central Valley Education Coalition (CVEC), thank you for the opportunity to comment on the Updated Draft Broadband Action Plan. The CVEC is an advocacy coalition of local educational agencies and the county superintendents in Fresno, Kings, Madera, Mariposa, Merced, and Tulare serving over 400,000 students in 128 educational agencies. The updated Action Plan contains more recognition of the role of the education sector and we appreciate the Vision Statement that all Californians have high-performance broadband available at home.

Madera County, including:
County Office of Education
4 Elementary School Districts
1 High School Districts
4 Unified School Districts

The COVID-19 pandemic has illuminated both the disparity in internet coverage as well as the imperative for students to have access in their homes to adequate, affordable and reliable internet to participate in our education system. The counties in the CVEC are taking a variety of approaches to improve coverage and access in their region; Some time ago Kings County Office of Education established [KingsNet](#) and is able to offer high speed access to students' homes. Tulare County Office of Education [recently created a high speed network](#). All of the CVEC counties are working on collaborative efforts with school districts and local and regional partners. As the state Action Plan is refined, we recommend the variety of approaches at local and regional levels continue to be recognized and supported.

Mariposa County, including:
County Office of Education/
Unified School District

The updated Action Plan outlines the core challenges faced by Californians in trying to access adequate, affordable, and reliable broadband. These challenges have become critical as they impinge on students' participation in distance learning. Schools have taken great strides to address these issues and based on these experiences we recommend that Goals outlined in the Action Plan explicitly include the following:

Merced County, including:
County Office of Education
13 Elementary School Districts
2 High School Districts
5 Unified School Districts

- Ensure the providers remove data caps, bandwidth throttling, or deprioritization.
- Accelerate permitting processes for towers and dishes in rural areas and streamline the DSA process. Explore regional valley-wide approaches that can generate economies of scale.
- Create incentives for multi-agency collaborations to pool resources and provide connectivity, including support for Joint Powers Authorities (JPAs) of educational and non-education agencies that can establish and own networks.
- Consider statewide standards in the development of these systems so that they are not proprietary technology, and they can talk with each other.
- Ensure faster upload and download speeds that accommodate increased usage.

Tulare County, including:
County Office of Education
36 Elementary School Districts
3 High School Districts
7 Unified School Districts

In addition, in the section on Cross-Cutting Actions, we recommend the statement on the State's Convening Power add "local educational agencies" to the entities to be convened as part of updating the Action Plan.

*128 Public Education Institutions
Serving Over 405,000 Students in
the Heart of California*

If we can be of further assistance, please contact me at [redacted] or via e-mail at [redacted]

Sincerely,

Legislative Advocate
Central Valley Education Coalition

Advocates: Ball/Frost Group, LLC
[redacted]