

**From:** Jacki Bacharach  
**To:** CA Broadband Council  
**Subject:** Comments to CBC Action Plan  
**Date:** Tuesday, November 10, 2020 6:52:50 PM  
**Attachments:** [11.20 supplemental comments to CBC re action plan.docx](#)

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Thank you for the opportunity to submit the attached comments.

Jacki Bacharach, Executive Director



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November 10, 2020

Stephanie Tom  
Deputy Director  
Broadband and Digital Literacy  
California Department of Technology  
1325 J Street, Sacramento  
Suite 1600  
Sacramento CA 95814-2941

Re: Supplemental Comments on California State Broadband Action Plan

Dear Ms. Tom:

The SBCCOG submitted initial comments to the California Broadband Council on October, 20, 2020. Based on participation in numerous “listening sessions”, we are supplementing those with the following focused on the draft Action Plan Outline.

Page 2: Vision

*All Californians must have access, both in their places of business and residence, and neighborhood 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.*

Comment: the words “and neighborhood” have been added to be consistent with access to the skills training objective. There is unlikely to be access in the home to skills training.

Second paragraph ends with this phrase -- *paired with the experience and skills to use it is an essential is key to achieving racial, social, and economic equity and community sustainability in California.*

Comment: Added “community sustainability” to incorporate the travel saving potential of broadband in the context of the State’s aggressive policies on GHG emissions reduction; and to reinforce the basis for using transportation funds for some aspects of broadband implementation.

Page 4 Access: Urban Areas

*While there is significant internet provision within urban areas, the quality and speed of the service varies dramatically by the income of the community.*

Comment: Among South Bay cities, pricing is high and service equally poor regardless of community income.

Page 4: Adoption

Note says Providers have low income programs today, but need to be better – i.e., more affordable, meet performance standard, and need to address literacy and devices.

Comment: In areas where providers’ programs for low income communities fail to meet performance standards, require them to provide the equivalent in the internet era of a public access

LOCAL GOVERNMENTS IN ACTION

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Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills  
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

facility from the cable TV franchising days. This will supply the network speeds, technology and digital literacy required but not yet delivered to homes.

Pages 8-9: Achieving Our Vision; Actions Over the Next 6 to 18 Months

Comment: Acknowledge new deployment models that will reduce the cost, shorten the time, and/ or bundle the benefits of access, adoption, technology, and digital literacy.

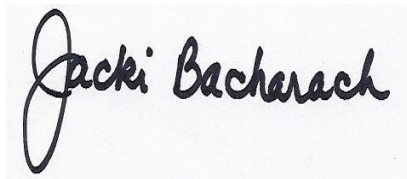
The SBCCOG previously introduced one such model, an innovation we refer to as “middle-mile: direct access,” a variation of “middle-mile: open access. Hopefully, there are others.

“Middle-mile: direct access” pilots will lead to evaluation compared to home-based systems in terms of essential outcomes, such as literacy, but also jobs acquired, businesses started, reduced vehicle miles travelled, public education classes delivered, and so forth. Another outcome to evaluate is whether “direct access” will develop the market for broadband leading to system expansion via “open access.”

The “direct access” model can also be applied in city halls to produce a multi e-government center; or in schools that can affordably add health care services or affordably share niche courses for which there are only a few students in each school (as demonstrated in the early 1990s in the Irvine School District with a Russian class, among others). The model is flexible and can be applied in many forms, especially to add functionality to schools, libraries, and local government facilities – all of which will add access, technology and digital skills to whatever community in which they occur, especially disadvantaged communities (DACs).

If you have any questions, please contact SBCCOG Research Director, Wally Siembab, @ [ws@siembab.com](mailto:ws@siembab.com)

Sincerely,

A handwritten signature in black ink that reads "Jacki Bacharach". The signature is written in a cursive style with a large, looping initial "J".

Jacki Bacharach  
SBCCOG Executive Director