

From: Wally Siembab
To: [CA Broadband Council](#)
Cc: Jacki Bacharach
Subject: Action Plan Comments
Date: Friday, November 20, 2020 11:27:44 AM
Attachments: Comments to CBC.docx

Comments attached.

To: CA Broadband Council

From: Walter Siembab, Siembab Corporation, Research Director, South Bay Cities Council of Governments

Date: November 20, 2020

Subject: Comments on Action Plan

1. The scenarios of family bandwidth demand were very well done and helpful.

It would be useful to develop other scenarios showing how that demand could be addressed. What if the home in the scenarios was less than 100 yards from a functionally robust public library serving as a middle-mile anchor institution with gig speed service? The 20/17 Mbps could easily be satisfied between home and a short walk from home.

2. Examples of applications were illustrated mostly in terms of what institutions need to deliver their services to residents and what residents need to obtain the services of those institutions (e.g., as distance education, telework or tele-medicine).

Illustrations of what residents need to independently produce and distribute their information, products and services to external markets is missing. Yet reducing the costs of entry to digital markets is one of the strengths of the Internet.

3. Region, sub-regions, Tribal Lands, exurbs, suburbs, and dense cities have distinct contexts and should have their own vision, goals, time-line, and initiatives since there is so much context-diversity in the state.

The state-wide goal, service that meets a minimum standard delivered to every home, provides a useful target for the state. However, different types of districts may need to set their own interim or short-term visions and the means to satisfy them. This will also have the effect of engaging a broader section of the public in participating in the broadband future of their community.

4. Data collection is focused on deployment, affordability/adoption, technology, and digital training – and the data are hard to acquire in each case.

Disadvantaged communities (DAC) are often priced out of the market for one or more of the key components, and they are a primary target for the broadband initiative as well as for most other state programs. A useful action would be to focus resources on learning more about DACs' bandwidth needs, technology gaps, digital literacy level,

potential uses, and budgets for network services that define what's "affordable." Those data will help craft the policies and programs to help those with the deepest needs.

5. Goals have not been met, so innovative strategies for reaching those goals should be encouraged as part of the Action Plan.

Actions should include encouraging and evaluating experiments in deployment, access, devices and training. In particular, encourage innovations by anchor institutions with middle mile connections at various service levels (less than a gig, 1 gig, 10 Gig), since those institutions are best positioned to integrate access, devices and training in one place. Assess costs, numbers served by each service, and benefits produced. Programs from this model should be captured on something like the Success Stories page currently found on the CBC site. The practice of anchor institutions in DACs and a good understanding of their needs will be especially valuable.

6. The goal is ambitious but achievable. An estimate of the cost of achieving the goal should be included in the Action Plan.

As the state continues to pursue the goal of broadband for all, it would be useful to future policy discussions for the Action Plan to include an estimate of the costs of achieving that goal, especially at the 100/100 service level. A first approximation will be just that. A figure based on assumptions which can be refined as more hard data are collected. It's important to understand the magnitude of Plan A so that various Plan B's can be evaluated.

7. Competition in the final mile may prove impossible to facilitate.

Wireline service tends to be a natural monopoly, historically, few carriers have been willing to overbuild existing plant. Therefore, "competition" may not be an effective strategy to lower prices. Other models for meeting the goal or a willingness of the state to pay the price are probably the best alternatives

8. Policy scenarios are developed within the public utility framework. A transportation framework will provide different insights and opportunities.

The utility model is based-in regulations and its methods get tied up with issues which become constraints, such as e-rates for libraries and schools which prevent final mile extensions. Transportation metaphors lead to concepts like public transit – a shared

vehicle for carrying a bunch of residents from near their home to near their destination. There is no public transit being proposed for the digital highway, but there should be.

Transportation consists of two related but separate concepts. Access, more or less the proximity to destinations, establishes the need for mobility. Mobility consists of systems that provide the ability to physically move people from origins to destinations. Broadband creates access, virtual access and so becomes a central part of the transportation field. Transportation metaphors, like public transit on the digital highway is the complement to public transit on the physical highway.

And there are no constraints as with the e-rate, no regulations to impose or follow, and a lot of transportation funds available for use.

Thank you for the opportunity to comment from the sub-regional and small suburban-city perspective. The comments deadline coming only 24 hours after the CBC meeting and about 48 hours after posting the most recent draft left no time for internal review by the SBCCOG Executive Director. The short window for reacting to the latest draft disadvantages stakeholders who have few resources and many responsibilities. Industry stakeholders do not face similar constraints and will surely offer more robust commentary.