

**From:** Abby Ridley-Kerr  
**To:** [CA Broadband Council](#)  
**Subject:** Public Comment Submission - Abby Ridley-Kerr, The Education Trust - West  
**Date:** Thursday, December 17, 2020 10:24:58 AM  
**Attachments:** Dec 17 CA Broadband Council public comment The Education Trust West.docx

---

Abby Ridley-Kerr  
Research and Data Analyst  
The Education Trust—West  
<http://www.edtrustwest.org> | Follow us @EdTrustWest

Good Afternoon Chair Amy Tong and Broadband Council Members

My name Abby Ridley-Kerr and I'm a Research and Data Analyst here in partnership with the UC Student Association, Cal State Student Association, and Student Senate for California Community Colleges representing the Education Trust – West

We are a nonprofit educational equity organization focused on educational justice and closing achievement and opportunity gaps through research, data, policy analysis, and advocacy.

We are here on behalf of the students, parents, educators, and community stakeholders deeply affected by the digital divide. We would like to thank the California Broadband Council for its efforts to build out a statewide plan which expands broadband access for all California residents. As we continue to live with the reality of COVID-19, it is important to have the voices of students, families, education equity advocates, community-based organizations and higher education partners represented in the public comments. Without those voices, we would be leaving the most important stakeholders out of the conversation.

We urge you to reject the status quo that we are living in and invest in both short-term and long-term solutions that will address the critical digital equity gaps we face.

In order to ensure that our students have accessible, affordable, and reliable broadband connectivity, we recommend you work to:

- a. Increase marketing and accessibility of reduced-cost/free broadband access programs and develop qualifying low-income metrics for postsecondary students such as Cal Grant, Pell, or CA Dream Act eligibility.
- b. Suspend caps on upload/download speed within reduced-cost/free broadband access programs so multiple devices or multiple user households can have reliable connectivity.
- c. Establish a symmetrical upload/download speed of 100 Mbps per household.
- d. Expand coverage within rural, tribal, and underserved low-income communities in order to prevent digital redlining.
- e. Secure intermediate and on-campus public accessibility through wifi integrated parking lots, safe on-campus learning centers, or cell on wheels.
- f. Invest in long-term broadband connectivity solutions that build out future proof networks and infrastructure such as those proposed by Legislators during the 2020 Legislative session.
- g. Promote data transparency from internet service providers (ISPs) and broadband companies on usage and marketing of their reduced-cost/free programs as well as efforts to expand these during the COVID-19 pandemic.
- h. Work towards a 1 to 1 student-to-device ratio at all education levels for our low-income students so they can connect to the internet via a router, hotspot, antenna, laptop, etc.
- i. Ensure that the action plan is technology-neutral so that the plan can be adaptable to future innovations in connectivity.

Thank you for your time today and for keeping equity front and center as you finalize this plan.