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RIVERSIDE COUNTY OFFICE OF EDUCATION



Kern County Superintendent of Schools

Office of Mary C. Barlow ...advocates for children

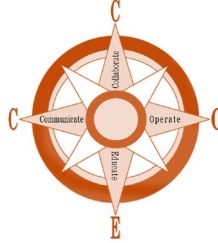


CALIFORNIA ASSOCIATION OF SUBURBAN SCHOOL DISTRICTS

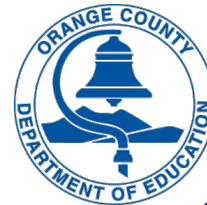


Tulare County Office of Education

Tim A. Hire, County Superintendent of Schools



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California Association for Bilingual Education



CALIFORNIA ASSOCIATION OF LATINO SUPERINTENDENTS AND ADMINISTRATORS



Santa Clara County Office of Education

October 28, 2020

Amy Tong
Chair of the California Broadband Council
Director of the CA Department of Technology
1325 J Street, Suite 1600
Sacramento, CA 95814

Dear Chairperson Amy Tong and California Broadband Council members,

On behalf of a coalition of local educational agencies, transitional kindergarten–12 public school management associations, and nonprofit educational corporations, we respectfully submit our recommendations to ensure that our 6.1 million students, parents, educators and staff, and local educational agencies (LEAs) are reflected in the short-term and long-term infrastructure deployment in the new State Broadband Action Plan. We believe that our students have a right to a high-quality and equitable educational system from early education to higher education. The time is now to lay a foundation that removes barriers that have systematically denied access to connectivity to our most vulnerable populations.

On March 13, 2020, Governor Gavin Newsom acted to protect the lives of students and educators from the health pandemic created by COVID-19 and directed LEAs to redesign education through distance learning to ensure students continued to receive instruction and nutritious meals in these uncertain times. It was in this moment, that COVID-19 revealed the reality that the digital divide persists, leaving behind over [1 million](#) students who either lack access to the Internet or computer devices to participate in distance learning.

From that date on, LEAs and community partners have worked non-stop to procure technology-based devices, internet services such as WIFI connectivity and hotspots, and in some cases taken full responsibility of building their own high-speed networks to ensure students in rural communities and financially disadvantaged regions have coverage, as demonstrated by Colusa County Office of Education, Kings County Office of Education, Tulare County Office of Education, and Riverside County

Office of Education. However, the issues of **access, affordability, and reliability** have not been addressed, which will require shared leadership of the public and private sectors to fund and build a connectivity infrastructure that eliminates the persistent inequities.

As the Council strives to meet its mandate to build a sound state broadband plan, our coalition offers the following recommendations to ensure our students are not forgotten:

Education Focused. While the Council has had extensive discussions with Internet Service Providers (ISP) and local governmental agencies hosted by California Forward and the California Transportation Agency, the Council has not had a dedicated session to discuss the direct impact the lack of a coordinated system has created for educators and the whole public education system from childcare services to TK-12 education to college and career programs.

Our Recommendation. As the public stewards entrusted to inspire and create the next generation of inventors, scientists and doctors, and visionaries for a better tomorrow, we believe that the Council would benefit greatly from a stand-alone listening session with the education community. We want to help craft a clear role and partnership that will ensure that we build a system using an equity lens to benefit every child.

1. Address the short-term needs to ensure learning occurs outside of the confines of school boundaries and provide necessary resources to secure technology-based instruments to meet immediate needs.
2. Address the long-term plan to expand and build out a robust infrastructure that leverages resources from both the public and private sectors and strengthens coordination to target rural and urban disadvantaged communities.

Access. When we transitioned to distance learning, LEAs went into overdrive to procure and distribute technology-based products and connectivity services, but recognized that in many instances we had to turn to the state for support to secure the resources to attain 700,000 laptops and 320,000 hotspots. We appreciate the hard-work and dedication of the State Superintendent of Public Instruction Tony Thurmond and his staff for mobilizing during this crisis. However, we still have tens of thousands of students who continue to lack access to the internet.

Our Recommendation. Partner with LEAs to determine families' connectivity needs and support the formation of Joint Power Authorities (JPAs) of public and private entities to establish their own networks through incentives and accelerated permitting processes for towers, antennas, and dishes to streamline the state's review process. Other formations of LEA partnerships could also be supported so that larger LEAs could support smaller ones, with the added benefit that funding earmarked for education remains in education.

The state will need to determine the amount of wireless/cellular network space that is available to facilitate the build out of locally created networks and continue to consider schools as appropriate entities to coordinate the build out of new Long-Term Evolution (LTE) towers.

Affordability. ISPs tout low-cost programs, but fail to recognize that the income thresholds to access these services for families in extreme poverty (i.e. family of 4 = \$28,700) in a high-cost state, leaving many families unable to access these services. In addition, the families who are able to access services through low-cost programs, the internet speeds are insufficient for downloading and uploading purposes. According to the [Legislative Analyst's Office \(LAO\)](#), there is a correlation between household income and subscription to a broadband internet service, in which households with a median annual income less than \$20,000 have a 53 percent adoption rate and for median annual household income greater than \$80,000, the adoption rate is 86 percent.

Our Recommendation. We recommend adopting state standards for low-cost programs that include minimum speeds of 100 Mbps for terrestrial broadband, and prohibition on limiting through-put and align the income thresholds to state sponsored social services programs to ensure that every student who qualifies for additional funding through the Local Control Funding Formula is eligible for these services free of charge. We recommend that California advocates to the Federal Communications Commission to provide the enhanced support of Lifeline Program Broadband subsidy which would increase the subsidy from \$9.25 to \$34.25 per household. Enhanced support is only offered to Tribal communities.

Reliability. According to the LAO, 97 percent of California households have access to broadband Internet, “defined as having download speeds 6 megabits per second (Mbps) and upload speeds of 1 Mbps”, which allows for some video calls but not sufficient when multiple children and parents/guardians are all simultaneously connected. The Governor’s Executive Order N-73-20 recognizes that 2 million Californians do not have access to broadband services at benchmark speeds of 100 Mbps for downloading.

Our Recommendation. We recommend establishing symmetrical upload and download speeds of the 100 Mbps per household.

We believe California is ready to lead with purpose and commitment to safeguard that every student, every educator, and school has the technology readiness, and access to overcome the COVID-19 challenges, and genuinely create a thriving opportunity for every student.

If you have any questions regarding this coalition letter, please do not hesitate to contact Sara Bachez, Chief Governmental Relations for the California Association of School Business Officials (CASBO) at

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Thank you!