

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider )  
Modifications to the California Advanced ) Rulemaking No. 12-10-012  
Services Fund. )

**COMMENTS OF  
CALIFORNIA EMERGING TECHNOLOGY FUND  
ON PHASE I ISSUES**

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March 16, 2018

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Order Instituting Rulemaking to Consider )	
Modifications to the California Advanced )	Rulemaking No. 12-10-012
<u>Services Fund.</u> )	(filed October 25, 2012)

**COMMENTS OF CALIFORNIA EMERGING TECHNOLOGY FUND  
ON PHASE I ISSUES**

Pursuant to Rule 6.2 of the Commission’s Rules of Practice and Procedure and the schedule set forth in the Amended Scoping Memo and Ruling of the Assigned Commissioner (Amended Scoping Memo) issued February 14, 2018 in the above-referenced proceeding, the California Emerging Technology Fund (CETF) hereby timely files comments on Phase I of Rulemaking No. (R.) 12-10-012. CETF is an existing party to this rulemaking proceeding, and commends the Commission on timely action on this important state Digital Divide program.

**I. Qualifications of CETF and the Statewide Digital Divide Challenge**

The California Emerging Technology Fund (CETF) was directed to be established by the California Public Utilities Commission (CPUC or Commission) as a public benefit from mergers in 2005 with the mission to close the Digital Divide in California. A nonprofit organization, CETF set major goals to achieve in a decade by 2017: 98% deployment of broadband infrastructure and 80% adoption for use of high-speed Internet service at home. CETF’s policies are technology neutral. Further, CETF uses the term “broadband” to refer generically to high-speed Internet service, including both wireline and wireless infrastructure. CETF has worked extensively -- and intensely -- throughout the entire state of California in pursuing the mission assigned by the CPUC. Over a decade, CETF has gained wide and deep experience that support these comments and recommendations on issues addressed in R.12-10-012.

CETF’s comments are based on ten years of experience in awarding and managing \$44.89 million in grants to more than one hundred non-profit community-based organizations (CBOs) and government agencies to provide digital literacy training to more than 830,000 individuals and achieve adoptions by more than 270,000 low-income households. CETF also invested more than \$10 million to develop and manage a comprehensive initiative called School2Home to close both the Digital Divide and Achievement Gap at low-performing middle

schools in low-income neighborhoods throughout California.<sup>1</sup> School2Home includes parent engagement and education to provide digital literacy training to use school-issued devices at home. In the last decade, School2Home has been implemented in 35 schools in 12 districts reaching more than 600 teachers and 14,000 students and their parents.

The task at hand is challenging because *California has more low-income households and disadvantaged residents than any other state*. To set a benchmark and measure progress, CETF developed and sponsors the Statewide Survey on Broadband Adoption to track high-speed Internet service at home. When the first Statewide Survey was conducted in 2008, only 55% of all California households were online at home—the same as the national average. In the largest region, Los Angeles County, less than half (48%) were online at home. More than 1.9 million people with disabilities were unconnected. With focused strategies and intense efforts by many, California has made steady progress towards closing the Digital Divide with significant gains in broadband adoption among all segments of the population and in every region. For example, the 2017 Statewide Survey conducted by the UC Berkeley Institute of Governmental Studies (IGS)<sup>2</sup> found that 87% of all households report high-speed Internet access at home—a gain of 32 percentage points since 2008. More good news includes the following:

- Low-income household adoption is up 48 percentage points (from 33% to 81%).
- Latino household adoption is up 48 percentage points (from 34% to 82%).
- People with disabilities adoption is up 39 percentage points (from 36% to 75%).

But there remain sobering challenges. *More than 5 million residents remain unconnected to the Internet at home*. Further, 18% are connected at home by only a smartphone.<sup>3</sup> While smartphones are marvelous hand held devices that allow access to an amazing amount of information on the Internet, it is difficult for students to do their homework or for adults to apply for jobs or acquire workforce skills using only a smartphone. Those who have high-speed Internet access at home with only a smartphone are becoming recognized as a distinct group referred to as “underconnected” because they have limited benefits from digital technology and are becoming another category of “have-nots”. The vast majority of people who subscribe to high-speed Internet service have multiple devices to obtain optimal benefits from digital

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<sup>1</sup> Please see CETF School2Home Initiative webpage at <http://www.cetfund.org/investments/school2home>

<sup>2</sup> <http://www.cetfund.org/progress/annualsurvey>

<sup>3</sup> <http://www.cetfund.org/progress/annualsurvey>

tools. In contrast, the most disadvantaged segments of the population remain unconnected at home and a higher percentage of these residents are underconnected having only a smartphone by which to access the Internet.

## II. Summary of CETF Phase I Comments

### A. Adoption Account

- Grantees of Adoption Account projects should be held accountable for results that contribute to verified home broadband adoption by target groups. If there is no verified adoption in the proposal, grantees should be required to set forth in their applications documented evidence/data as to why and how the proposed grant activities will lead to broadband adoption, to survey persons served as to home connectivity and socio-economic demographic data to establish a baseline of population being served, and to conduct a statistically reliable survey of persons served after the grant to determine if it resulted in increased adoption. In both the application and the completion report, the grantee should be required to report the overall cost per outcome.
- CETF opposes grants based merely on reimbursement of expenses as set forth in the Staff Proposal, because it is less likely to lead to the specified AB 1665 goal of home adoptions. *CETF urges adoption grants require verified adoptions<sup>4</sup> in order to receive grant payments.* The CPUC should seek the cooperation of the Controller to find a better approach to grant funds based on performance, and/or seek legislation to allow a more efficient grantmaking basis.
- Broadband adoption is most effective when incorporated into an existing program managed by an organization (non-profit organization or public agency) that already interacts with large numbers of low-income households and disadvantaged populations. The CPUC should use caution in awarding grants to “start-ups” that have little experience in Digital Inclusion and do not propose accountability for verified outcomes. CETF expresses strong concerns about the proposal to allow costs for equipment and furniture, which will invite applications not focused on results. Similarly, purchase of electronic devices by grantees should not be a major use of the Adoption Account; it is better that grantees have a sustainability plan for the program post-grant, to ensure that purchased devices continue to support Digital Inclusion after the grant and is not mingled with their general inventory.
- CETF applauds expedited review for smaller grants, but suggests that \$100,000 (as opposed to \$50,000) is a better amount to accomplish more significant impacts after a ramp-up period. Further, CETF suggests that a two year timeframe will better optimize return on investment.
- The Commission should encourage partnerships between grantees and incumbent Internet Service Providers (ISPs) to promote existing affordable broadband offers and sign up low-

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<sup>4</sup> CETF strongly recommends adoption verification be proven as follows for each household that has not previously been subscribed to broadband: (1) a welcome letter or email from the ISP after installation with a date on it; or (2) a copy of the first ISP bill showing new service. See [http://www.cetfund.org/investment/Grant\\_Opportunities\\_2016/Adoption\\_Verification](http://www.cetfund.org/investment/Grant_Opportunities_2016/Adoption_Verification)

income households. Grantees should be required to provide information about *all* available affordable broadband offers to prospective customers. ISPs should be encouraged to increase their media advertising and bill insert notices about affordable broadband offers and coordinate activities of community-based organizations on outreach in-language and in-culture, and jointly convene community fairs to sign up eligible households.

- Consistent with AB1665 which encourages public-private collaboration among stakeholders, the Commission should urge ISPs to regularly and publicly report their progress on signing up low-income households in California for their available broadband offers. This data will inform public policy as to effective affordable offers, and will aid in transparency and accountability for ISPs with affordable broadband offer obligations to regulatory agencies.
- Broadband adoptions as measured by verified new subscriptions can be achieved for \$250 per adoption if incumbent ISPs are sincere partners in advertising affordable offers and community sign-up events. \$250 is sufficient to cover outreach, digital literacy training, help to find an affordable device (purchased by customer and not part of grant funding), and assistance with comparing broadband service offers and signing up for service. This figure is a good benchmark for allowed amounts per adoption in a grant.
- Applicants should be required to submit a work plan and budget in order to evaluate the viability and practicality of the proposed strategies and activities to produce verified broadband adoption outcomes. CETF urges grant funding based only on performance and verified results, as noted above due to the small Adoption Fund size. If performance-based grantmaking is adopted, CETF recommends providing the first quarterly payment at the time the grant agreement is signed, the second quarterly payment based on good-faith progress in implementing the work plan and meeting milestones, and quarterly payments thereafter pursuant to performance reconciled to funding per number of agreed-upon outcomes. The last payment should be made only after the completion report is submitted to the CPUC.
- CETF supports a 15% match by grantees, and urges it be allowed to be met by a grantee providing dedicated personnel that are supported by other funds. CETF will provide the match (up to \$37.50, which is 15% of \$250) per verified subscription adoption for CBOs interested in partnering. The Commission should reach out to other non-profit organizations and foundations to explore and invite a pool of matching funds for Adoption Fund grants.
- The Commission should convene workshops for Adoption Fund grantees as a “learning community” to share best practices and solving of common problems, peer support and coaching, and mutual accountability for results.

## **B. Public Housing Account**

- CETF opposed the provision of AB1665 that made SB745 retroactive, thereby nullifying numerous pending CBO applications for infrastructure funding from the Public Housing Account. CETF urges the CPUC to take a strong policy position in favor of getting all residents in publicly-subsidized multi-unit attached housing complexes online, and to participate in the stakeholder processes to be convened by state legislators on the topic.

- CETF requests the Commission retain all applications submitted to the Public Housing Account before AB1665 became effective until the stakeholder process that will be convened by Assemblymember Eduardo Garcia concludes.
- The Commission should consider using some of the Public Housing Account funding to study the status of broadband adoption in the complexes that were the subject of the CBO Public Housing applications to better understand the barriers to broadband adoption in publicly-subsidized housing. CETF's data indicate that only about 20-25% of residents in such housing subscribe to market rate offers, most are unaware of available affordable offers, and many cannot afford the low cost offers.
- The Commission should encourage ISPs to work in collaboration with affordable housing leaders to market their affordable offers more effectively to residents.
- Applicants for funding from the Infrastructure Grant Account should be encouraged to determine if there are any publicly-subsidized housing in the proposal's grant area that could benefit from being included in the deployment plans.

### **C. Revolving Loan Account**

- The Commission should learn from recipients of existing Revolving Loan Account grants what were limitations as to the viability of such loans.
- The Commission should request assistance from the Regional Broadband Consortia to identify community development financial agencies and the economic development corporations in their regions so that the CPUC can consult with them to improve the broadband infrastructure program.

### **III. CETF Sponsored AB1665, The Internet For All Now Act of 2017, Due to the Urgent Need for Additional Funding for Infrastructure and Adoption Programs**

The statistics in Table 1 below are the reasons why CETF sponsored the Internet For All Now Act of 2017 (AB1665 or the IFAN Act) which authorizes \$330 million in additional collections into the California Advanced Services Fund (CASF) over the next 5 years. Based on the 2017 Statewide Survey, Table 1 shows exactly which state residents constitute the unconnected and the underconnected: low-income persons, Spanish-speakers, people with disabilities, seniors, and non-high school graduates. Going forward, CASF programs should be carefully tailored to target these unconnected and underconnected population segments in a proactive way by Commission staff, not in a reactive way.

**Table 1. The Most Disadvantaged Residents Are Unconnected and Underconnected**

<b>Segment of the Population (2017 Statewide Survey)</b>	<b>Connected at Home</b>	<b>Smartphone Only</b>	<b>Not Connected at Home</b>
Statewide	87%	18%	13%
Earning Less Than \$20,000 Annually	75%	27%	25%
Spanish-Speakers	70%	38%	30%
People with Disabilities	75%	15%	25%
Adults Age 65 or Older (Seniors)	69%	9%	31%
Non-High School Graduates	67%	28%	33%

The original language of the IFAN Act as proposed by CETF -- and supported by the IFAN Coalition of more than 100 organizations -- was fiercely opposed by large incumbent Internet Service Providers. In CETF’s view, the final version of AB1665, as passed by the Legislature and signed into law by Governor Brown, contains several problematic provisions. For example, CETF proposed the new Broadband Adoption Account because it was clear that now, it is possible to authorize additional surcharge collections into the CASF that support both broadband deployment and adoption over the next decade without increasing telephone surcharges above the highest historical level, thus maintaining the consumer relief that was accomplished when the High-Cost B Fund for telephone subsidies was reformed to provide funds for the initial CASF by the CPUC and Legislature in 2008. However, CETF proposed and justified analytically that the Adoption Account should be capitalized with *\$100 million* to achieve 90% adoption statewide by 2023, but AB1665 authorized the Adoption Account with only \$20 million. Thus, with only one-fifth the funding needed to achieve the adoption goal, CETF recommends funding of projects that are laser focused on the most needy population segments (as set forth in Table 1 above), and by grantees that are willing to comply with metrics to demonstrate measurable impact on the designated groups.

Further, incumbent ISPs even opposed setting a goal for broadband adoption and diluted the focus on verified low-income subscriptions as the performance metric. The compromise was to direct the Commission to “develop, by June 30, 2018, criteria for awarding grants *and a process and methodology for verifying outcomes*” with payment based on “*digital inclusion*

*metrics*” determined by the Commission.<sup>5</sup> Thus, this rulemaking to set up the first Adoption Account grant rules is vitally important. In CETF’s view, Adoption Account grants should be made in a focused way to target the unconnected and underconnected populations segments set forth in Table 1, and, consistent with AB1665’s language, the Commission’s program rules should include verified adoption and reporting of metrics by grantees to ensure there is measurable impact leading to increases in broadband adoption. Unfortunately, the current Staff Proposal lacks the process for verification outcome and performance metrics based on outcomes. Only by including those requirements can the Commission have the data to report the increases in broadband adoption to the Legislature, as required by AB1665.

#### **IV. CETF’s Comments on the Proposed Broadband Adoption Account Program**

CETF appreciates the diligence with which the Commission and its CASF Staff has moved forward to prepare for making Adoption Account grants available for application by July 1, 2018, and commends the Assigned Commissioner and Assigned Administrative Law Judge for scheduling several public forums and workshops to obtain citizen input throughout the state. Above in Section I, CETF set forth its qualifications to comment on broadband adoption programs, as the most experienced funder of broadband adoption programs in California over the last ten years. As background, research shows that a successful broadband adoption program for low-income households must address three barriers: (1) cost; (2) relevance; and (3) digital literacy.<sup>6</sup> Through three open and competitive rounds of grantmaking between 2007 and 2017, CETF’s experience in the broadband adoption area has evolved to focus on *verified new broadband subscriptions in targeted populations* as the most compelling approach to addressing all three barriers -- and the most reliable metric to increase broadband adoption. While there are many well-meaning and laudable projects and programs that aim to increase digital literacy, without an intentional imperative to drive to new broadband subscriptions in the targeted

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<sup>5</sup> AB1665, Chapter 851 (approved by the Governor and filed with the Secretary of State on Oct. 15, 2017). Section 3, adding Section 281(j)(3) and (4) (emphasis added).

<sup>6</sup> Study shows that the main reasons people do not adopt broadband at home are cost (36%), Digital Literacy (22%), and relevance (19%). See Broadband Adoption and Use in America, FCC and Broadband.Gov National Broadband Plan, by John Horrigan, at slide 16 (March 2010). <https://transition.fcc.gov/DiversityFAC/032410/consumer-survey-horrigan.pdf>



population, there is little evidence that those kinds of activities on their own increase adoption as a direct consequence in a reasonable and measurable timeframe.

In addition, research about the use of computing and broadband technologies in schools as well as the CETF experience with its School2Home initiative<sup>7</sup> underscores the need to integrate instructional technology into a comprehensive school transformation initiative. CETF has found that grants for computing devices and technology alone will have limited impact and will not increase broadband adoption.

Further, it must be kept in mind that two-thirds of low-income households in California don't have children in school, so other outreach strategies are required to reach those adult/senior residents. Finally, as Table 1 demonstrated, an underconnected community are people with disabilities; focused efforts need to be made to reach low-income members of this community with varying special needs.

To be sure, access to computing devices at schools, libraries and community centers coupled with digital literacy training is helpful for those who participate in such programs and opportunities. However, these activities alone don't result in home adoption without additional intervention by "trusted messengers and honest brokers"<sup>8</sup> to inform eligible residents about available affordable offers for high-speed Internet service and assist them through the process of understanding and comparing offers and signing up for a subscription. Further, recent surveys and focus groups with low-income residents conducted by CETF reveal that approximately 70% of eligible households are not aware of affordable offers and are wary of companies trying to get them to sign up for long term service contracts and/or up-sell them. Thus, CETF recommends that as part of its broadband adoption effort, the Commission should urge incumbent ISPs to increase media advertising and bill insert information about available affordable broadband offers, partner with CBOs for outreach and digital literacy training, and regularly report their progress on low-income broadband subscriptions in California. Attached as Attachment A is a Summary of Lessons Learned from CETF grantmaking.

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<sup>7</sup> Please see CETF School2Home Initiative webpage at <http://www.cetfund.org/investments/school2home>

<sup>8</sup> By "trusted messengers and honest brokers," we mean known community members and groups within the target communities, such as community-based organizations, local churches, "promotores" (community lay health worker in Latino communities), school staff, or local government agencies who serve low-income and disadvantaged communities.

In the Appendix B Adoption Account proposals, both the Digital Literacy Projects and the Broadband Access Projects will award CASF funds at a milestone and after a project completion report is filed, *regardless of the number of participants who subsequently subscribe to broadband Internet service at home.*<sup>9</sup> CETF strongly recommends that no CASF funds should be paid out until there are verified participants of the project that subscribed to broadband at home reported to the Commission in grantee reports.<sup>10</sup> Only in this way, will the limited Adoption Account be used for the specific statutory goal, namely broadband adoption by unconnected and underconnected households at home.

It is essential that both the Digital Literacy Project and Broadband Access Project grantees are accountable for results that contribute to broadband adoption at home of the target communities. If the CPUC is going to award grants based on metrics other than verified new subscriptions by low-income households, then grantees should be required to delineate in their applications documented evidence or data as to why and how the proposed grant activities will lead to broadband adoption at home by the target communities. For grants awarded on metrics other than verified subscriptions, the Commission should require its grantees to conduct screening surveys of every person served regarding their socio-economic demographic data and status of their home broadband connectivity to establish a baseline of the population being served,<sup>11</sup> and to conduct a statistically-reliable survey of persons served after the grant to determine if it resulted in increased broadband adoption. All grantees should be required to set forth in both their application and final report the overall cost per outcome for transparency, public accountability, and analysis of cost-effectiveness of various strategies for increasing adoption for future policymaking. This is the fairest approach to assessing success in closing the Digital Divide.

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<sup>9</sup> See Appendix B, Amended Scoping Memo, at pp. 11-12, where the completion report at the end of the deployment period for both Digital Literacy and Broadband Access projects requires the number of participants that subsequently subscribe to broadband Internet service provider to use a device at home. Under Payment, on page 12, grantees may get partial payment after six months of deployment, so long as it submits a milestone report. A full payment request requires a project completion report, which includes subscription metrics *but does not require actual subscriptions to be obtained in order to get payment.*

<sup>10</sup> See footnote 4 for CETF's policy on broadband adoption verifications for its grantees.

<sup>11</sup> During this screening survey, the person can be asked about his or her interest in low cost broadband offers, whether the person owns a computing device, and need for digital literacy training. Those expressing interest should be referred to grantees or groups conducting broadband adoption training and providing low cost devices. The Commission could serve as an online clearinghouse of information for persons wanting to find Digital Literacy programs and public access computers in the State.

Grantmaking based on reimbursement of expenses instead of outcomes is inefficient and will waste precious funds in the Adoption Account for administrative costs. The Commission should seek the cooperation of the Controller to find a better approach to grant payments based on performance and/ or seek legislation to allow more results-oriented management.

CETF further points out that in its experience, broadband adoption is most effective when incorporated into an existing program managed by an organization (non-profit or government agency) that already interacts with large numbers of low-income households and disadvantaged populations. This type of organization is a “trusted messenger.” The Commission should use caution in awarding grants to “start-ups” that have little experience in Digital Inclusion and accountability for outcomes. Unfortunately, the staff proposal for allowed costs for electronic devices and furniture invite applications that don’t focus on adoption results.

Further, purchase of electronic devices should not be a major use of the Adoption Account because grantees should have a plan for sustainability of their program after the grant. There are legions of examples of electronic devices being bought for computer labs and classrooms that were never used and sat in a closet, or were used until the grant was over and then shelved, or they wore out or became obsolete, and then there was no sustained effort. Districts with schools in low-income neighborhoods can afford to buy devices by prioritizing existing funds and should be encouraged to do so to support appropriate technology education for their students. The Adoption Account should not be used for expenditures that any government institution will need to make on an ongoing basis to sustain a technology program. If the Commission proceeds with allowing Adoption Account grants to purchase devices, equipment and furniture, then a plan should be required of the grantee to ensure that these purchased items will continue to be used to support Digital Inclusion after conclusion of the grant (and not mingled with their general inventory).

In Appendix B, the Staff laudably proposes expedited review for smaller grants of \$50,000 or below.<sup>12</sup> However, it is CETF’s experience that \$50,000 is a very small amount to accomplish significant impact, particularly if there are metrics other than verifiable broadband subscriptions. *A more appropriate level for administrative approval of grants is \$100,000.* Further, even for experienced CBOs, it takes time to ramp up activity to have an impact and a

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<sup>12</sup> Appendix B, at pp. 9-10.

one year timeframe is often too short. CETF recommends that larger grants with up to a two year timeframe for results will optimize return on investment.

CETF also recommends that the Commission should encourage partnerships between grantees and incumbent Internet Service Providers (ISPs) to promote existing affordable broadband offers<sup>13</sup> and sign up low-income households, although grantees should be required to provide information about all available offers on a technology neutral basis to prospective customers.<sup>14</sup> CETF proposed the provision in AB1665 that declares: “It is the policy of the state to encourage collaboration among stakeholders and to promote public-private partnerships to harness the expertise and strengths of all partners to serve the public interest.” The impact of the Adoption Account grants can be amplified if ISPs significantly increase their media advertising about affordable offers, coordinate activities of CBOs on outreach in-language and in-culture, and agree to jointly-convene community connect fairs to sign up eligible households.

In the spirit of public-private collaboration, CETF recommends that the Commission should urge or require incumbent ISPs to regularly and publicly report their progress on signing up low-income households in California for their available broadband affordable offers. Today, there is no public data to determine which affordable programs are actually working, where to promote affordable offers most effectively, and the best ways to target grants from the Adoption Account. Absent reliable data, we cannot assess broadband adoption programs for success and inform our policy choices. *In summary, public reporting of progress is critical for transparency and accountability relating to these public dollars.*

In our experience, CETF can state with authority that broadband adoptions (measured by verified new broadband subscriptions) can be achieved for \$250 per adoption if incumbent ISPs are sincere partners in advertising their affordable broadband offers and collaborating on outreach events to target communities. The \$250 per adoption figure was set forth by CPUC Administrative Law Judge Karl J. Bemesderfer in the Proposed Decision for Application No. 14-04-013 (Comcast’s proposed acquisition of Time Warner Cable) based on testimony and cost

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<sup>13</sup> A number of ISPs such as Comcast, AT&T, Charter and Frontier, have existing affordable broadband offers resulting from merger obligations either at the FCC or at the CPUC. CETF emphasizes how important these affordable offers are to the target communities and that once the offers expire, the cost barrier will be very hard to overcome by low-income residents.

<sup>14</sup> In 2010-2013, CETF conducted a successful “Get Connected!” broadband campaign in target low-income, Latino, rural and people with disabilities communities. CETF is willing to donate the “Get Connected” logo to brand the CASF Adoption Program grantees’ efforts as a statewide digital equality campaign. See [http://www.cetfund.org/investments/overview/get\\_connected](http://www.cetfund.org/investments/overview/get_connected)

analysis submitted by CETF and CBO partners. The \$250 figure is sufficient to cover outreach, digital literacy training, help to find an affordable electronic device (purchased by the customer and not part of the grant funding), and assistance with comparing offers and signing up for service. That figure is a good benchmark for allowed amounts per adoption in a grant. All grant applications that have lesser outcomes that are not as labor-intensive as adoption verified by new subscriptions — such as number the number of people using a computer lab or the people trained — should be allowed much less per outcome in a grant to better stretch the limited funds in the Adoption Account.

CETF recommends that the program adds a required work plan and budget from all applicants in order to evaluate the viability and practicality of the proposed strategies and activities to produce stated outcomes, including sustainability in the post grant era. However, CETF's ideal procedure, as stated above, is for the Commission to fund grants based on performance and work with the Controller on an arrangement to accommodate performance-based payments, even seeking legislative authority if necessary. A grantee with the discipline and capacity to develop specified outcomes for a set amount per deliverable usually also has the management skills to prepare a coherent work plan and adequate budget. If grant payments are made based on documented outcomes, then the process can be much more efficient with greater transparency and accountability. One approach to performance-based grantmaking that also is sensitive to the cash-flow challenges for many CBOs is to provide the first quarterly payment at the time the grant agreement is signed, the second quarterly payment based on good-faith progress in implementing the work plan and meeting milestones, and quarterly payments thereafter pursuant to performance reconciled to funding per number of agreed-upon outcomes. It also is prudent to withhold a portion of the last payment until a completion report is submitted and accepted by the Commission.

In its proposal, the CASF Staff has recommended a 15% match be provided by the applicant, with the Commission funding 85% of a project.<sup>15</sup> Requiring a match is a good way to assure real commitment by the applicant. CETF finds a 15% match is rather modest, so that match amount level should not be that big a hurdle for grantees. CETF recommends that grantees should be allowed to meet the 15% required match by dedicated personnel that are supported by other funds. CETF will provide the match (up to \$37.50 or 15% of \$250) per

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<sup>15</sup> Appendix B, at Section 1.5 Eligible Projects, at 3 (Digital Literacy projects) and 4 (Broadband Access Project).

verified subscription adoption for CBOs interested in partnering with CETF on Adoption projects. Pursuant to Memoranda of Understanding (MOUs) with Frontier Communications and Charter Communications, CETF currently manages grants in Frontier service areas for \$60 per adoption plus a new computing devices and has awarded grants in the Charter services areas for \$120 per adoption. CETF proposes to work with those grantees to explore how they can leverage CETF funding as match for Adoption Account grants, once approved by the Commission. The Commission CASF staff should reach out to other non-profits organizations or foundations interested in technology and digital equity to explore and invite a pool of matching funds.

Finally, CETF recommends that the CPUC's Communications Division convene workshops for grantees as a "learning community" to share best practices and solving of common problems, peer support and coaching, and mutual accountability for results. This practice and discipline by the Commission will ensure better overall results and greater impact from the Adoption Account.

## **V. CETF Comments on the Public Housing Account Proposal**

CETF is a champion for the goal of getting online all residents in publicly-subsidized housing. CETF strongly opposed the provision in AB1665 that made Senate Bill 745 retroactive, thereby nullifying pending Community Based Organization applications for infrastructure applications from the Public Housing Account. Assemblymember Eduardo Garcia (in cooperation with Senator Steve Bradford, author of AB1299 that established the CASF Public Housing Account) agreed to convene a stakeholder process to address the problems in AB1665 and explore how to best meet the needs of the most economically-disadvantaged households in California. CETF urges the Commission to participate as a stakeholder in that process. The Commission also should take a strong policy position in favor of getting all residents in publicly-

subsidized multi-unit attached housing complexes online as a strategy to tackle poverty, and to prevent the Homework Gap<sup>16</sup> for school age children living in the housing.<sup>17</sup>

CETF requests that the Commission retain all the applications that were submitted for Public Housing Account infrastructure grants before AB1665 became effective, until there is an outcome of the stakeholder process. In the meantime, the Commission should consider allowing some of the funds in the Public Housing Account for adoption to be used to determine the status of adoption in all the complexes that were the subject of the previously-submitted infrastructure grant applications to gather data on the barriers to broadband adoption in publicly-subsidized housing. Data collected previously and analyzed by CETF indicate that only about 25% of residents in publicly-subsidized multi-unit attached housing subscribe to market-rate offers,<sup>18</sup> most are not aware of available affordable broadband offers, and many cannot afford even the \$10-\$15 per month discounted offers if they did know about them.<sup>19</sup> Further, the ISPs are not actively marketing their affordable offers in these kinds of housing complexes, which exacerbates the problems there, including the Homework Gap for school children residing in the complexes.

The Commission should encourage ISPs to work in collaboration with affordable housing leaders to market their affordable broadband offers. Attached as Attachment B are summaries of meetings between affordable housing organizations and ISPs to initiate the conversation. These have been submitted to Senator Bradford and Assemblymember Garcia.

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<sup>16</sup> The “Homework Gap” was coined by FCC Commissioner Jessica Rosenworcel for the problem caused when school children cannot access the Internet at home to do homework, and thus fall behind their classmates with Internet access. Seven in ten teachers assign homework requiring the Internet. She cited a study from the Hispanic Heritage Foundation, Family Online Safety Institute and My College Options, stating that nearly 50 percent of students say they have been unable to complete a homework assignment because they didn’t have access to the Internet or a computer. 42 percent of students say they received a lower grade on an assignment because they didn’t have access to the Internet. [https://www.huffingtonpost.com/jessica-rosenworcel/bridging-the-homework-gap\\_b\\_7590042.html](https://www.huffingtonpost.com/jessica-rosenworcel/bridging-the-homework-gap_b_7590042.html)

<sup>17</sup> In 2013, there were about 5 million households (out of 29 million) with school-age children in the United States that lacked access to high-speed Internet service. Low-income households and minority households made up a “disproportionate” share of those 5 million households; 31.4% of households with school-age children whose incomes fell below \$50,000 fell into the group without Internet access at home. This group makes up about 40% of all families with school-age children in the U.S. See Horrigan, John B., “The Numbers Behind the Broadband Homework Gap” April 20, 2015 <https://www.pewresearch.org/fact-tank/2015/04/20/the-numbers-behind-the-broadband-homework-gap>

<sup>18</sup> Resolution T-17515, Approval of Funding for the Public Housing Infrastructure Grant Applications of the Housing Authority of San Bernardino County et al, issued June 9, 2016, at 7 (Charter and Comcast provided data showing an average of 25% of public housing residents subscribe to broadband service; housing authorities (that were proposing free limited broadband service to all residents) responded that residents don’t subscribe because they cannot afford the ISP’s cost of service).

<sup>19</sup> Based on 2016 surveys conducted by Eden Housing in various public housing development properties throughout the state.

Applicants for funding from the Infrastructure Grant Account should be encouraged to determine if there are publicly-subsidized multi-unit housing complexes in the proposal grant area that could benefit from being included in the deployment plans. CETF has inventoried all publicly-subsidized multi-unit complexes by Legislative District and will make those available to the Commission, stakeholders, and the public.

## **VI. CETF Comments on the Revolving Loan Account**

The Commission should be sensitive to the needs of the recipients of the existing loans and learn from them the limitations on the viability of the Revolving Loan Account. Also CETF suggest that the CPUC request assistance from the Regional Broadband Consortia to identify community development financial agencies and economic development corporations in their regions so that the Commission can consult and inform them about the Revolving Loan Account.

**WHEREFORE**, CETF respectfully requests the Commission amend its CASF proposals contained in Appendix B to be in accord with the above comments.

Respectfully submitted,

*/s/ Sunne Wright McPeak*

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*/s/ Rachelle Chong*

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Outside Special Counsel to CETF

March 16, 2018





**ATTACHMENT A**  
**California Emerging Technology Fund**  
**Summary of Lessons Learned from Grantmaking**  
**Focus Drives Results – People Make the Difference**

A hallmark of the California Emerging Technology Fund Venture Philanthropy Grantmaking is FOCUS on specified deliverables and quantified outcomes in Grant Agreements, accountability for RESULTS through Quarterly Reports, Annual Site Reviews, and Final Reports as a basis for grant payments, and facilitated interaction among PEOPLE in Learning Communities to share experiences, address common problems, and collaborate. CETF as an “investment partner” engages, informs, monitors, assists, and helps grantees correct course when needed—all critical factors in reaching success. This culture of partnership is the foundation for meeting and exceeding performance goals. CETF conducted overall evaluations and analysis for each round of grants. The following summarizes the Lessons Learned that are incorporated into CETF grantmaking going forward to increase broadband adoption.

**Lessons Learned by CETF in Grantmaking**

- Focus on results identified in a clear action plan and accountability for achieving those results, based on individual grantee performance and overall success in closing the Digital Divide.
- Develop grantee executive leadership and staff management capacity to achieve successful outcomes that enhance potential for organizational sustainability.
- Promote collaboration with other complementary organizations to enhance and leverage resources and effectiveness of each partner.
- Leverage funds to enhance the success of a project and prospects for sustainability.
- Incorporate Digital Literacy training and affordable computing devices and broadband subscription offers with public awareness about broadband benefits to optimize adoption.

**Lessons Learned by Grantee Partners in Achieving Adoptions**

- Augment broadband availability and Digital Literacy curriculum with additional services to achieve and sustain adoptions among hard-to-reach populations.
- Drive sustainable adoption and broadband subscription with a full spectrum of services and additional incentives.
- Link commitment to job placements with Digital Literacy training and workforce preparation.
- Provide access to affordable computer hardware and ongoing technical assistance.
- Pursue sustainability by integrating Digital Literacy, broadband adoption and information technology strategies into all projects to align with priorities of specific funders.

With limited resources available for broadband adoption, distribution of information about affordable broadband offers and assistance with signing up for reduced-cost Internet service should be incorporated into existing health and human services agencies and public utilities that serve large numbers of low-income households to “institutionalize” Digital Inclusion.

January 15, 2018

The Honorable Steve Bradford  
California State Senator, District 35  
State Capitol, Room 2062  
Sacramento, California 95814

Dear Senator Bradford:

We are writing in reference to the Public Housing Account of the California Advanced Services Fund (CASF) and implementation of AB 1665. Publicly-subsidized housing organizations are very concerned that AB1665 nullified the majority of the pending applications for infrastructure connectivity that were submitted to the California Public Utilities Commission (CPUC) pursuant to your original legislation (AB1299 in 2013). The Internet For All Now Coalition warned Legislators about this serious problem, but the AB1665 authors retained the flawed provision. We are requesting your leadership to work with Assemblymember Eduardo Garcia and other interested Legislators to convene a new stakeholder process to address the very acute problem of Internet connectivity for low-income residents in publicly-subsidized housing as was your original vision in authoring AB1299.

The problem arises because AB1665 made SB745 retroactive which rules out most pending applications for the CASF Public Housing Account. SB745 restricted Public Housing Account infrastructure grants to unserved housing developments defined where at least one housing unit within the development is not offered broadband service regardless of other realities, such as current or historical status of connectivity and costs to building owners or residents. The CPUC CASF staff concluded that, out of the 395 properties that applied for AB 1299 infrastructure funding from 2014-2016, only 15 were “unserved” as defined by SB745 which became effective January 1, 2017. In order to fully subscribe the Public Housing Account pursuant to the provisions of AB1299, affordable housing organizations submitted a sufficient number of applications by the CPUC deadline of October 1, 2016 to use almost all of the \$20 million for infrastructure connectivity authorized by AB1299. Now, all of that effort by affordable housing organizations has been wiped out by AB1665 and the majority of low-income residents in publicly-subsidized housing are still unconnected.

As you will recall, your original legislation was introduced and passed in recognition that most residents in publicly-subsidized housing are not online because of several hurdles: broadband infrastructure is not readily available to each housing unit that allows residents to connect at an affordable rate; existing infrastructure and available service is priced beyond the ability of residents to afford available subscription; residents generally are apprehensive of entering into a standard agreement with Internet Service Providers (ISPs); and many residents need digital literacy training. Data showed that take rates of market-rate subscriptions in affordable housing complexes with infrastructure was only about 20%. But, with Public Housing Account grants, the number of online users increased dramatically once affordable high-speed Internet service was available in each unit and residents were trained to use the technology. AB 1299 also ensured that existing ISPs had an opportunity to continue to market their products by requiring applicants for Public Housing Account grants not to deny access to any provider. Rather than expend so much time and energy on debating rules for implementation that exclude the majority of the publicly-subsidized housing developments, there should be a quality

conversation among all the stakeholders about how best to get our low-income residents online. At the end of the Legislative session last year, Assemblymember Garcia offered to convene stakeholders and reiterated that commitment in addressing the Regional Consortia Summit last week. He also referenced talking to you in his remarks, so we are hopeful that a productive process can be facilitated this year.

You may be interested to know that during the AB1665 debate last year, with encouragement and support from the California Emerging Technology Fund (CETF), we reached out to each major ISP and requested meetings with them to explore opportunities for collaboration to get online all of our residents. We appreciate that each company took the time to meet with us and open up a conversation that could lead to a new era of collaboration. Attached are summaries of those meetings, which reveal that there needs to be a renewed focus and shared commitment by all stakeholders to break through the status quo. Of course, leadership from Legislators always makes a huge difference. Otherwise, the lowest-income and most-disadvantaged Californians will remain stuck on the wrong side of the Digital Divide.

We and CETF invite sincere partnerships with ISPs and want to focus on how best to get all of our residents online. We hope that you will join with Assemblymember Garcia to convene all stakeholders in a productive forward-looking conversation.

Sincerely,



Amie Fishman  
Chief Executive Officer  
Non-Profit Housing Association of  
Northern California (NPH)



Alan Greenlee  
Executive Director  
Southern California Association  
of Non-Profit Housing

The logo for the Southern California Association of Non-Profit Housing (SCANPH) features the word 'SCANPH' in a large, bold, black, sans-serif font.

SOUTHERN CALIFORNIA ASSOCIATION OF NONPROFIT HOUSING



Donald S. Falk  
Executive Director  
Tenderloin Neighborhood Development



Dora Leong Gallo  
Chief Executive Officer  
A Community of Friends



Cesar Zaldivar-Motts  
Board Director  
Oldtimers Housing Development Corporation



Maggie Cervantes  
Executive Director  
New Economics for Women



Rachel Iskow  
Executive Director  
Mutual Housing California



Laura Fernea  
Executive Director  
City Heights Community Development Corp.



Kenneth Trigueiro  
Vice President  
Peoples Self Help Housing



Chris Hess  
Director of Resident Services  
Satellite Affordable Housing Associates



Cynthia Parker  
President and CEO  
Bridge Housing



Sam Moss  
Executive Director  
Mission Housing Development Corporation



C: Assemblymember Eduardo Garcia  
CPUC Commissioner Martha Guzman Aceves  
California Emerging Technology Fund



**Publicly-Subsidized Housing Organizations and Internet Service Providers Meetings  
Broadband Connectivity and Adoption in Publicly-Subsidized Housing Developments  
August 2017**

**Background**

In May-June 2017, six publicly-subsidized organizations agreed to facilitate conversations with Internet Service Providers (ISPs) to discuss: (1) the affordable broadband offer from the provider (price, speed, eligibility, use requirements, other conditions); (2) the goals and plans from the provider for marketing the affordable offer to the residents in publicly-subsidized housing developments; (3) any additional provider assistance to help get residents online at home (digital literacy training, technical support, affordable devices); (4) any provider funding for the affordable housing organizations to assist them in marketing their subscription product; and (5) the position of the provider on the California Advanced Service Fund (CASF) Public Housing Account. The affordable housing organizations that engaged in this activity were Mutual Housing, Eden Housing, New Economics for Women, County of San Bernardino Community Development and Housing Agency, Oldtimers Housing Development Corporation, and City Heights Community Development Corporation.

**Overview of Meetings between Housing Leaders and Internet Service Providers**

Publicly-subsidized housing organizations met in person and/or conducted conference calls with Comcast Communications, AT&T, Frontier Communications, Charter Communications, and Cox Communications. Below is an overview of the meetings between affordable housing leaders, followed by Summary Reports submitted by the host organizations.

<b>Host Housing Organization:</b>	Mutual Housing 8001 Fruitridge Road, Suite A Sacramento, California 95820
<b>Host Housing Organization Contact:</b>	Anne-Marie Flynn, Community Development Officer annemarie@mutualhousing.com Office: 916.453.8400 ext. 220
<b>Internet Service Provider (ISP):</b>	Comcast Communications
<b>Meeting/Conference Call Date:</b>	May, 25, 2017 (in-person meeting); July 27, 2017 (follow up conference call with Philip Arndt, Comcast Communications Government Affairs Director)
<b>Meeting/Conference Call Highlights:</b>	Mary Stutts, Vice President, External Affairs California, represented Comcast Communications. She primarily presented information about their low-cost offer program (Internet Essentials). Comcast representatives offered help with Digital Literacy training and marketing materials but would not provide funding for those activities. They stated they do not support publicly- subsidized housing organizations applying for CASF funding to connect residents in served areas.

<b>Host Housing Organization:</b>	Eden Housing 22645 Grand Street Hayward, California 94541
<b>Host Housing Organization Contact:</b>	Nathan Ho Policy and Communications Manager NHo@edenhousing.org Office: 510.247.8193 Cell: 510.432.5848
<b>Internet Service Provider (ISP):</b>	AT&T in Northern California
<b>Meeting/Conference Call Date:</b>	Two confirmed meetings were postponed by AT&T

<b>Host Housing Organization:</b>	New Economics for Women 303 S Loma Drive Los Angeles, California 90017
<b>Host Housing Organization Contact:</b>	Maggie Cervantes Executive Director mcervantes@neweconomics.us Office: 213.483.2060 ext. 304
<b>Internet Service Provider (ISP):</b>	Charter Communications
<b>Meeting/Conference Call Date:</b>	June 16, 2017 (in person meeting)
<b>Meeting/ Conference Call Highlights:</b>	Cynthia Howell and Katherine Shapiro, Charter Communications External Government Affairs representatives, attended the meeting. They stated Charter might consider helping with outreach materials and sending representatives to community events or meetings to promote their existing low-cost Internet offer (Spectrum Internet Assist). Ms. Howell mentioned Charter is giving CETF funding to implement a grant program and suggested community-based organizations apply through CETF if they need funding. Ms. Howell stated Charter supports AB 1665 as long as the infrastructure work is conducted in unserved areas. She added Charter does not support subsidies to housing organizations to “overbuild networks” in served areas.
<b>Internet Service Provider (ISP):</b>	AT&T
<b>Meeting/Conference Call Date:</b>	April 18, 2017 and May 18, 2017
<b>Meeting/ Conference Call Highlights:</b>	In-person meeting on June 29, 2017 was postponed by AT&T. New Economics for Women and Oldtimers Housing Development Corporation attended two conference calls with Noel Pallais and Lupita Gomez, AT&T External Affairs representatives. They stated AT&T is committed to working with affordable housing organizations to promote their low-cost offer (AT&T Access). Representatives stated they could print and ship marketing materials, and send representatives to conduct orientations and enrollment events, but would not provide funding.

<b>Host Housing Organization:</b>	County of San Bernardino Community Development and Housing Agency 385 N. Arrowhead Avenue, 3rd Floor San Bernardino, California 92415
<b>Host Housing Organization Contact:</b>	Kathryn Brann Housing Development Manager Kathryn.Brann@cdh.sbcounty.gov
<b>Internet Service Provider:</b>	Frontier Communications and Charter Communications
<b>Meeting/Conference Call Date:</b>	April 21, 2017 and April 24, 2017 (conference calls); April 27, 2017 and July 20, 2017 (in-person meetings).
<b>Meeting/Conference Call Highlights:</b>	<p>Kathryn Brann and Martha van Rooijen (Executive Director of the Inland Empire Regional Broadband Consortium) met with Jacqueline Kinney, Frontier Communications Vice President of State Government Affairs for California, at the San Bernardino County Housing Department. Ms. Kinney provided information on the Frontier Communications low-cost Internet offer and the grant program they are implementing in collaboration with CETF. She expressed there were no additional ways Frontier could support connectivity or adoption for residents and emphasized Frontier would not support any subsidies to housing organizations to connect properties in served areas.</p> <p>Ms. Brann and Ms. van Rooijen coordinated a second in-person meeting with Frontier Communications, Charter Communications, and publicly-subsidized housing organizations in San Bernardino County. AT&amp;T was invited but did not attend. Both ISPs provided information on their low-cost Internet offers, stated that the programs they have in place for low-income people are being implemented in collaboration with CETF, and expressed support for the current version of AB 1665. Frontier representative did not answer additional specific questions about CASF funding for publicly-subsidized housing organizations but Charter representatives stated they did not support subsidies to housing organizations to connect properties in served areas.</p>

<b>Host Housing Organization:</b>	Oldtimers Housing Development Corporation P.O. Box 327 Bell Gardens, California 90201
<b>Host Housing Organization Contact:</b>	Cesar Zaldivar-Motts Board Director, Treasurer mottscz@sdccorp.org Office: 323.585.4579
<b>Internet Service Provider:</b>	Frontier Communications
<b>Meeting/Conference Call Date:</b>	June 30, 2017
<b>Meeting/Conference Call Highlights:</b>	Jesus Torres, Frontier External Affairs Director, attended the meeting. He provided information on their low-cost Internet offer and the grant program they are implementing in collaboration with CETF. Mr. Torres stated Frontier could negotiate bulk pricing for Internet service at publicly- subsidized housing properties and committed to facilitating an introduction to the person responsible of these matters at Frontier Communications. He expressed the need of the ISP to collaborate with organizations in other counties to help low-income households subscribe to their low-cost offer. Mr. Torres stated he was not knowledgeable about CASF Public Housing Account.

<b>Host Housing Organization:</b>	City Heights Community Development Corporation 4001 El Cajon Blvd., Suite 205 San Diego, California 92105
<b>Host Housing Organization Contact:</b>	Rosie Sanchez-Ulloa Community Organizing Program Manager rulloa@cityheightscdc.org Office: 619.961.1070
<b>Internet Service Provider:</b>	Cox Communications
<b>Meeting/Conference Call Date:</b>	June 27, 2017
<b>Meeting/Conference Call Highlights:</b>	Ian Shifrin, Cox Communications Business and Development Marketing representative, participated in the conference call. Mr. Shifrin committed to providing marketing materials and field representatives to help publicly-subsidized housing organizations conduct outreach and facilitate subscriptions at their properties. Mr. Shifrin stated he was not familiar with CASF funding. He said his company could negotiate bulk pricing for Internet service. Cox Communications has not been responsive to multiple calls and email messages to meet in person.





## Getting Publicly-Subsidized Housing Residents Online Publicly-Subsidized Housing Organizations and Internet Service Provider Meeting Summary Report

Name of Host Organization: Mutual Housing California

Name of Internet Service Provider (ISP): Comcast  
Name and Title of ISP Representative(s): Mary Stutts, VP External Affairs, CA; Scott Adams, Director of Government and External Affairs; Regina Evans, Senior Director of Government Affairs. Followed up with Phillip Arndt on July 27, 2017.

Meeting Date: May 25, 2017  
Attendees and Affiliations: Anne-Marie Flynn, Mutual Housing; Rachel Iskow, Mutual Housing; Bryan Dove, Mutual Housing; Fernando Cibrian, Mutual Housing.

### I. Meeting Summary

*Please provide a brief summary of the ISP answers and comments regarding the following questions.*

- What is your affordable broadband offer from the provider (price, speed, eligibility, use requirements, other conditions) for which our residents could be eligible?

The offer that Comcast presented is “Internet Essentials” which is described in the attachment to this Report. The basics are:

Cost: \$9.95 for internet, \$149.99 for a laptop or desktop computer

Speed: 10/1 Mbps

Eligibility: In Comcast service area, have not subscribed to Comcast internet service within the last 90 days, do not have outstanding Comcast debt that is under one year old, in publically subsidized housing or school lunch program

Application: Can apply online or over the phone on a dedicated line for this program (ie: intent of Comcast is that there will not upselling to other products when customers call).

- What are your goals and plans for marketing your affordable offer to our residents?  
What percentage of subscription would you consider success?

They reported on their success to date with the following statistics since 2016:

- 750,000 low income families in the U.S. connected to internet for first time
- 54,000 computers provided through the program in the U.S.
- Distributed 53 million pieces of Internet Essentials marketing materials at no cost and broadcast 8.5 million PSAs valued at nearly \$110 million, also in the nation.

- Phillip Arndt committed to getting specific statistics to Mutual Housing for California and for the Sacramento region, which will be shared with partners and CETF.
  - Comcast does not have a specific subscription goal and stated that their goal is for all households in public housing to have Internet access. They only began making specific efforts towards housing infrastructure last year. Prior to that they had been concentrating on outreach through schools. They have had limited success working directly through HUD and are interested in partnering directly with non-profit housing organizations.
- What other efforts or assistance are you planning to help get online all residents (digital literacy training, tech support, affordable devices)?

Comcast stated that they are continuing to make improvements in the program including the following:

- Have expanded eligibility 9 times since 2011.
  - Have materials in 12 languages beyond English and Spanish.
  - Have dedicated call centers for Spanish speakers.
  - Have an amnesty program for families with a past due Comcast debt that is more than one year old, regardless of the amount.
  - Have increased the download speed three times in four years.
  - They do offer support through partners agencies in digital literacy training.
  - They offer computers for \$149 to households that are eligible for Internet Essentials, they have found that few households are taking advantage of this offer.
- What funding are you planning to make available to affordable housing organizations to assist in marketing your offer and helping residents subscribe?

Comcast did not offer any specific funding to assist affordable housing organizations. They offered help with training on digital literacy, materials, marketing, but not funding. Mutual Housing made a specific request for financial resources and Comcast said they are going to see what they can do to provide some funding support for Mutual Housing staff in doing outreach and assistance in getting people enrolled in the program. No commitments yet, but Mutual Housing will be following up.

- What is your position on the California Advanced Service Fund (CASF) Public Housing Account and why? Should it continue? How much funds should be collected? What are the essential rules that you support to make CASF Public Housing Account workable to get all residents online who reside in publicly-supported housing?

Phillip Arndt provided a somewhat nuanced answer saying Comcast is supportive of CASF providing funding for unserved rural areas, but has a problem with public funding going to organizations that were already within a Comcast service area. He was not willing or able to offer any more specifics on this topic. Mutual Housing emphasized the reason that CASF funding was useful and why it was a problem for some of our residents to access the Internet through Comcast s because their service is not affordable, even at \$10 a month.

Mutual Housing also emphasized how much staff time it takes to actually do outreach and take people through the process of taking advantage of a program such as Internet Essentials, even if it is a good program. Mutual Housing underscored that just giving people flyers is not sufficient for them to take advantage of an offer due to lack of affordability for their income level, language challenges, and lack of trust.

## II. Next Steps

*Please delineate the next steps that both parties agreed to take to get at least 80% of publicly-subsidized housing residents trained and online at home. Please specific timetable and responsible party.*

- Mutual Housing will check with Comcast to be sure that they are on their list of housing communities whose residents can receive auto-approval.
- Mutual Housing will meet with local Comcast representatives to talk about further next steps for getting our residents online. A follow-up meeting was held on July 27, 2017 with Phillip Arndt.
- Mutual Housing will share information with other affordable housing organizations.
- Comcast stated they are willing and happy to meet with other organizations directly about their affordable offer program Internet Essentials.

## III. Recommendations

*Please concisely recommend actions for the California Emerging Technology Fund (CETF) to continue to: (a) assist affordable organizations and their residents on challenges related to access and adoption of high-speed Internet service at home; and (b) foster collaboration with the ISP.*

- Connect other housing organizations directly with Comcast representatives so that they can learn first-hand about the program Internet Essentials.
- Make sure that all publically- subsidized housing organizations are on Comcast's list of eligible housing organization to participate in their program Internet Essentials.



## **Getting Publicly-Subsidized Housing Residents Online Publicly-Subsidized Housing Organizations and Internet Service Provider Meeting Summary Report**

Name of Host Organization: New Economics for Women

Name of Internet Service Provider (ISP): Charter Communications, Inc.

Name and Title of ISP Representative(s): Cindy Howell, Vice President, State Government Affairs – West Region; Katherine Shapiro, Director, Government & Community Strategy

Meeting Date: June 16, 2017

Attendees and Affiliations:

1. Leticia Andueza, New Economics for Women
2. Veronica McDonnell, West Valley Community Development Corporation
3. Sandra Villalobos, NEW Capital, LLC
4. Raquel Cinat, California Emerging Technology Fund
5. Cesar Zaldivar-Motts, Oldtimers Housing Community Development
6. Davis Foley, Peoples' Self-Help Housing
7. Bobby Coulter, Fresno Housing Authority
8. Jennifer Reed, Eden Housing

### **I. Meeting Summary**

*Please provide a brief summary of the ISP answers and comments regarding the following questions.*

- What is your affordable broadband offer from the provider (price, speed, eligibility, use requirements, other conditions) for which our residents could be eligible?

Overall Description of Affordable Offer (Spectrum Internet Assist)

- \$14.99/Month High-Speed Internet Service
- 30Mbps Download Speed with No Data Caps
- FREE Internet Modem
- No Contracts
- May Add Fast In-Home WiFi for \$5 More a Month
- Promotional and Phone Bundle Offers

Who Qualifies:

- Families with Students Participating in National School Lunch Program
- Seniors 65+ Who Receive Supplemental Security Income Program

Additional Criteria:

- Current Phone and Video Customers Who Meet 1-Requirement Can Enroll
- Cannot Have Had a Network Broadband Subscription Within 30 Days of Signing Up
- Will Not Be Denied Participation Due to a Bad Credit Score, But Need to Clear Any Outstanding Debt Incurred Within the Last Year to Be Eligible
- Timeline for Installation: 1 ½ Weeks from Qualifying for the Program

- What are your goals and plans for marketing your affordable offer to our residents?  
What percentage of subscription would you consider success?
  - Link with community organizations to promote within their programs.
  - Link with schools to promote offer.
  - Open to opportunities to augment or expand outreach.
- What other efforts or assistance are you planning to help get online all residents (digital literacy training, tech support, affordable devices)?
  - Linking to other programs, such as affordable devices.
  - Link to organizations who provide digital literacy training
- What funding are you planning to make available to affordable housing organizations to assist in marketing your offer and helping residents subscribe?
  - Attend community events or meetings hosted by affordable housing developer to promote offer Spectrum Assist.
  - Might be able to help with marketing materials (e.g. low-cost offer flyers).
- What is your position on the California Advanced Service Fund (CASF) Public Housing Account and why? Should it continue? How much funds should be collected? What are the essential rules that you support to make CASF Public Housing Account workable to get all residents online who reside in publicly-supported housing?
  - Charter supports AB 1665 as long as the infrastructure work is conducted in currently unserved areas.
  - Charter does not support subsidies to housing organizations to “overbuild networks” in served areas.
  - Charter representative stated she would take a look at past applications that were challenged by Charter (per People’s Self Help Housing’s request), but said it was not likely Charter will change its decision to challenge applications in served areas. She added their position had been clear since the inception of CASF.

## II. Next Steps

*Please delineate the next steps that both parties agreed to take to get at least 80% of publicly-subsidized housing residents trained and online at home. Please specific timetable and responsible party.*

- Housing organizations will promote Spectrum Internet Assist as a bundle with affordable equipment offers and digital literacy.
- Charter will consider hosting presentations at resident meetings.
- Charter will consider helping housing organizations with marketing materials (e.g. flyers)

### **III. Recommendations**

*Please concisely recommend actions for the California Emerging Technology Fund (CETF) to continue to: (a) assist affordable organizations and their residents on challenges related to access and adoption of high-speed Internet service at home; and (b) foster collaboration with the ISP.*

- Distribute information on Spectrum Internet Assist to those who qualify: advertise within the senior community and at beginning of the school year provide all students who participate in the National School Lunch Program.
- Provide promotional materials (such as banners, fliers, other support) to affordable housing organizations.
- Support strategies and collaboration between ISPs and affordable housing organizations so they are able to access online enrollment approvals.
- Seek more options in services areas such as Fresno and the San Joaquin Valley.



**San Bernardino County  
Community Development and Housing  
Housing Collaborative Meeting  
July 20, 2017**

**Getting Publicly-Subsidized Housing Residents Online  
Publicly-Subsidized Housing Organizations and Internet Service Provider Meeting  
Summary Report**

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**Name of Host Organization:**

San Bernardino County Community Development and Housing

**Name of Internet Service Provider (ISP):**

**AT&T**

**Frontier Communications**

**Spectrum**

**Name and Title of ISP Representative(s):**

**AT&T:**

AT&T representative Julio Figueroa was unable to attend; however, "Access from AT&T" F were provided and Martha van Rooijen, IERBC explained the Program at the meeting

**Frontier Communications:**

Jesus Torres, Director, External Affairs

**Spectrum:**

Sandra Magana Cuellar, Director of Government Affairs

James Herrera, Sr. Account Executive, Sales, Community Solutions

Lex Dandan, Account Executive, Sales, Community Solutions

**Meeting Date: Thursday, July 20, 2017**

**Attendees and Affiliations:**

Sandra Bowers, Hope through Housing Foundation

Sarah Domingez, SCAG

Christy Eishof, City of Colton Housing Authority

Brad Grooms, San Bernardino County Information Services Department

Alan Greenlee, Southern California Association of Nonprofit Housing

Maral Hernandez, San Bernardino County Legislative Office

Linda Jackson, NID Housing Counseling Agency

Zoe Kranemann, National Core

Josh Lee, San Bernardino County Transportation Commission

Al Marshall, Pacific National Development

Rishad Mitha, San Bernardino County Housing Authority

Greta Noble, San Bernardino Community Development & Housing

L. Estrada, Inland Fair Housing & Mediation Board

Ted Stimpfel, Newberry Springs Alliance

Martha van Rooijen, Inland Empire Regional Broadband Consortium (IERBC)



## I. Meeting Summary

*Please provide a brief summary of the ISP answers and comments regarding the following questions.*

- **What is your affordable broadband offer from the provider (price, speed, eligibility, use requirements, other conditions) for which our residents could be eligible?**

### **AT&T: “Access from AT&T”**

- \$5/Mo for 150 GB of Data and Speeds within 768 kbps to 3 mbps,
- \$10/Mo for 1 TB of Data and Speeds within 5 mbps to 10 mbps
- If monthly data allowance is exceeded, customer is charged \$10 for each 50 GB of data in excess of plan.
- Eligibility:
  - At least one person in household receives food stamps
  - For California, at least one person in household receives SSI because SSI benefit includes food stamp allocation
- Access from AT&T website: [att.com/access](http://att.com/access)
- Program Phone Number: 855-220-5211
- No contract, no deposit, and no installation fees
- Can be an existing AT&T customer
- Program is only in areas where AT&T offers Wireline Home Service (not AT&T U-Verse)
- Program is available April 2016 to April 2020

### **Frontier Communications: “Affordable Broadband”**

- \$21/ Mo for Broadband and Life Line Flat Rate Telephone Service
- Free modem router
- Free Chromebook provided upon sign-up completion
- (Note: Free Chromebook is available as part of the CETF CBO partner program even if low-income household signs up on another low-income internet program)
- Speeds were not discussed by Frontier Representative
- Eligibility:
  - Customer must subscribe to California Lifeline Landline Flat-rate Phone Package and then add Frontier Affordable Broadband for a bundled rate of approx. \$21/Mo.
- Program is only available through California Emerging Technology Fund (CETF) Community Based Organization (CBO) Partners in Inland Empire
  - United Way San Bernardino County 211 Program
  - Great Harvest Community Center, San Bernardino
- Inland Empire CETF Partners:
  - United Way 211
  - Great Harvest Community Center
- Activation fees waived
- No Frontier’s Affordable Internet Program website was provided
- No Frontier 800 Number was provided

**Spectrum: “Spectrum Internet Assist”**

- \$14.99/Mo plus \$5.00/Mo for Home WiFi, including a router
  - Modem is no extra cost
  - Speeds of 30 mbps down//4 mbps down
  - Eligibility:
    - One member of household on Free Lunch Program
    - One household member 65 and older and on SSI
  - Spectrum Internet Assist website: [www.spectruminternetassist.com](http://www.spectruminternetassist.com)
  - Program Phone Number: 844-525-1574
  - NOTE: Spectrum also provided information about Spectrum Enterprise Services. Two Account Executives provided an overview of cost savings of signing a contract to provide internet under one master account to serve the residents. The affordable housing developer or operator could then pass on the cost to the residents in their rent, or if they were able to do so, just include it as an amenity for the residents.
    - Internet service at in the \$20 range per month, per household are possible depending on the complexity of the wiring/infrastructure needed, the number of units, and the length of the contract. The longer the contract, the better the rates.
    - This option eliminates individual billing
    - Spectrum has Enterprise Divisions for condos/apartment complexes healthcare providers/hospitals, education, commercial buildings, entertainment venues, public parks, dorms, and RV parks. Although there is no dedicated Spectrum Enterprise Group set up for affordable housing complexes, the enterprise division could accommodate the need if there is a desire for this type of service.
- 
- **What are your goals and plans for marketing your affordable offer to our residents? What percentage of subscription would you consider success?**

**AT&T: “Access from AT&T”**

- Representative was unable to be at meeting. This question could not be answered.

**Frontier Communications: “Affordable Broadband”**

- Frontier indicated that they would attend events in the community, and would participate in meetings at public housing complexes where CETF partner CBO (s) would provide the “Affordable Broadband” program information and sign-up support.
- There was interest from the meeting participants in setting meetings at public housing complexes.
- The issue of subscription rates and success measures were brought up at the meeting; the Frontier representative stated that the program was not as successful needed to be revised as having the Lifeline program be the only eligibility factor was reducing the number of sign-ups significantly as many low-income households were not willing to switch their Lifeline program from their cell phone to a Frontier landline. In addition, Frontier stated that more CBO’s are needed as there are two in San Bernardino County and none in Riverside County and they are working with CETF on both of these issues, as well as other issues that could not be publicly mentioned but if adopted will improve the program and the rate of subscriptions.

**Spectrum: “Spectrum Internet Assist”**

- Spectrum representatives stated that CETF received funding from an agreement with Spectrum, and that CETF will be partnering with CBO’s that will provide outreach in the community. They recommended that San Bernardino County check with CETF on status of this effort.
  - The issue of subscription rates and success measures were brought up at the meeting; however, there was no clear response when asked what percentage of subscriptions would be considered a success.
  - Spectrum representatives made several references to CETF forthcoming efforts with regard to marketing, community outreach, and subscription sign-ups.
  - Note: Spectrum Enterprise service representatives stated that they would work case-by-case to develop a contract for providing internet to affordable housing buildings/complexes. They are open to working with public housing developers and operators. The longer the contract, the better the rates they can provide, and they may be able to cover the cost of infrastructure upgrades based on the number of units served, length of the contract, and analyzing the level of infrastructure needed.
- **What other efforts or assistance are you planning to help get online all residents (digital literacy training, tech support, affordable devices)?**

**AT&T: “Access from AT&T”**

- Representative was unable to be at meeting. This question could not be answered.

**Frontier Communications: “Affordable Broadband”**

- Frontier discussed some upcoming changes to their affordable broadband program that are being discussed with CETF and would be announced at a later time, as well as the free Chromebooks being offered by Frontier through the CETF agreement.
- Frontier mentioned marketing efforts of joining community events where CETF CBO’s were participating and/or setting the events up, and that the CBO’s should meet with residents at affordable housing buildings/complexes.
- The Frontier representative also said if anyone in the meeting wanted to follow up, he would be available to talk with them.
- No digital literacy, training or other affordable devices were discussed in response to this question.

**Spectrum: “Spectrum Internet Assist”**

- Spectrum representatives reiterated that Spectrum is working closely with CETF, and that CETF received funding from an agreement with Spectrum. The understanding from the Spectrum representatives was that CETF will be partnering with CBO’s and this effort will include outreach, digital training, and potentially provision of affordable devices.

- **What funding are you planning to make available to affordable housing organizations to assist in marketing your offer and helping residents subscribe?**

**AT&T: “Access from AT&T”**

- Representative was unable to be at meeting. This question could not be answered.

**Frontier Communications: “Affordable Broadband”**

- Frontier indicated they did not have funding for this—they were supportive of CETF CBO partners getting households signed up through the CETF agreement.

**Spectrum: “Spectrum Internet Assist”**

- Spectrum indicated they had a customer service number and website for the Spectrum Internet Assist Program.
  - Spectrum said they attend when invited to community events like the San Bernardino County Housing meeting.
  - Spectrum representatives reiterated that Spectrum provided funds to CETF through an agreement, and that CETF will be rolling out CBO partnerships and/or other program elements to help get low-income households signed up.
- **What is your position on the California Advanced Service Fund (CASF) Public Housing Account and why? Should it continue? How much funds should be collected? What are the essential rules that you support to make CASF Public Housing Account workable to get all residents online who reside in publicly-supported housing?**

**AT&T**

- Representative was unable to be at meeting. This question could not be answered.

**Frontier Communications**

- Frontier indicated they are supportive of the current version of AB1665, which will provide more funding to the CASF program. When asked about the public housing account, the representative did not know the details about why the public housing account fund was removed, but pointed to new funding in the legislation for CASF adoption programs. They had no answer for how much funding should be collected. They were not able to answer specific questions about CASF public housing account funding.
- Spectrum indicated they are supportive of the current version of AB1665 and that they thought the CASF adoption funding is in the legislation. They stated that they do not support the CASF public housing funding because the funds were proposed in their service area. They felt that since service is available, the units are served and should not get CASF grants. They stated they would continue to challenge CASF public housing grant applications that are located where they provide service. They were supportive of CASF adoption funding. In addition, Spectrum continued to emphasize that they are supportive of AB1665 and supportive of CETF.

## II. Next Steps

*Please delineate the next steps that both parties agreed to take to get at least 80% of publicly-subsidized housing residents trained and online at home. Please specific timetable and responsible party.*

- Frontier and Spectrum both said that they were working with CETF and that they had affordable internet programs as discussed at the meeting.
- The ISP's indicated they would follow up with interested meeting participants.
  - Action: Rishad Mitha from the San Bernardino County Housing Authority met with both Frontier and Spectrum after the meeting and the discussed setting up times to talk about the needs of the Housing Authority complexes. The meetings/discussions are planned in August.
  - Action: City of Colton representatives would like AT&T to follow up with them as the City has wireline service from AT&T. The City representative asked San Bernardino County and IERBC to help facilitate this follow up with AT&T. Action: Martha van Rooijen will follow up with Colton and AT&T in late July/early August.
- San Bernardino County Community Development and Housing wants to map all the areas in their GIS system where the ISP's provide wireline service in San Bernardino County.
  - Action: San Bernardino County already has Frontier wireline service zip codes that were provided by CETF and will use these for their GIS mapping. The County will follow up with Spectrum and AT&T to get their wireline service zip codes. This will allow the County to match up all the affordable housing complexes with the correct ISP wireline service. Once this is done, they are going to help facilitate group events with interested affordable housing complexes with the Frontier Representative, the CETF Frontier Program CBO's.
- San Bernardino County Community Development and Housing wants to work with Spectrum to facilitate enterprise type service during the development stage of affordable housing, as well as for existing affordable housing.
  - Action: San Bernardino County will work with the Spectrum Enterprise Account Representatives to set up meetings with affordable housing developers and operators in the County that want to explore contracting with Spectrum as an Enterprise account for affordable internet services where there is one account under the developer/operator. No specific date was provided for this; however, this effort is anticipated to be undertaken over the next 6-12 months.

### III. Recommendations

*Please concisely recommend actions for the California Emerging Technology Fund (CETF) to continue to: (a) assist affordable organizations and their residents on challenges related to access and adoption of high-speed Internet service at home; and (b) foster collaboration with the ISP.*

- **Recommendation: AT&T’s “Access” program ends in 2020 and should be extended**  
CETF could work with AT&T to extend the program past 2020.
- **Recommendation: Frontier’s “Affordable Broadband” program could be enhanced**  
CETF could negotiate with Frontier to eliminate the requirement that program participants sign up for Lifeline, as it requires the household to give up their cell phone in order to receive affordable internet.

CETF could help facilitate Frontier to allow more options for program eligibility.

CETF could add more CBO partners to serve the Inland Empire region, including having a CBO that more directly serves and is available to rural communities in both Riverside and San Bernardino Counties.

CETF could request that Frontier set up a website with a referral to the CBO’s and have the Frontier customer service 800 number refer low income customers to the local CBO’s so they can sign up for Frontier’s affordable broadband program, and receive the free Chromebook.

It was noted by the Frontier representative that if Frontier signs up a person for the affordable broadband program, the household is not eligible for a free Chromebook. Therefore, referral by Frontier to the CBO’s becomes critical for low-income households to receive the free Chromebook benefit.

CETF could encourage Frontier to sponsor/host internet sign up events at public housing complexes and community centers. This could be done in conjunction with CBO’s. Frontier could work with cities and counties for these events. Note: SCE did a series of well-attended energy saving/solar education events throughout the Inland Empire a few years ago that were hosted by various cities with SCE representatives providing information and discussion. This could be done with Frontier and the CBO’s.

- **Recommendation: Spectrum’s “Internet Assist” could be enhanced**  
CETF could provide funding through their Spectrum agreement for CBO’s in the Inland Empire to perform outreach, digital training, laptops, and sign-ups for the Spectrum Internet Assist Program. Since the CETF program is being formed now, CETF could solicit ideas for how to implement this type of outreach/programs.

CETF could encourage Spectrum to sponsor/host internet sign-up events similar to what is discussed above for Frontier. If CBO’s are part of the CETF program, the CBO’s would also be instrumental for these events.

- **Recommendation: Spectrum's enterprise account should be promoted to help affordable housing complexes get low-cost internet to all of the residents**

Spectrum explained that long-term contracts could result in sizable savings in providing internet to low-income residents in affordable housing complexes.

CETF could make effort and policy guidelines that encourages ISP enterprise programs to work with affordable housing. The guidelines could be tailored to the needs of public housing developers and operators. This effort could be shared with all ISP's as many may have enterprise type divisions that are not reaching out to affordable housing.

- CETF could provide grants to existing digital training/adoption programs in the Inland Empire such as to SmartRiverside, Anza Electrical Cooperative, and the San Bernardino County Housing Authority, as well as others, to leverage and utilize existing resources, and support internet sign-ups for all low-income programs provided by ISP's in the region.
- **Recommendation: More information is needed within the Inland Empire about ISP low-income internet programs**

ISP's need to provide flyers and more materials about their low-income internet programs to city/county offices, community centers and non-profit groups throughout the Inland Empire.

- **Recommendation: Current contact information for ISP's and CETF CBO's is needed in one location, such as CETF website**

CETF could have links to available low-income ISP internet programs on the CETF website.

CETF could provide current phone and email contact information on the CETF website for ISP government liaisons, ISP key staff related to low-income internet programs, and all CETF CBO partners.

- **Recommendation: CETF needs more CBO partners in the Inland Empire**

CETF, San Bernardino/Riverside Counties and the Inland Empire Regional Consortium could work closely to identify additional qualified CBO's to participate in CETF programs, such as the upcoming CETF-spectrum program



## Getting Publicly-Subsidized Housing Residents Online Publicly-Subsidized Housing Organizations and Internet Service Provider Meeting Summary Report

Name of Host Organization: City Heights Community Development Corporation (CHCDC)

Name of Internet Service Provider (ISP): Cox Communications

Name and Title of ISP Representative(s): Ian Shifrin, Business and Development

Meeting Date: June 28, 2017

Attendees and Affiliations: Ian Shifrin (Business and Development, Cox Communications); Tricia McKenzie (Resident Services Coordinator, CHCDC); Nancy Vera (Resident Services Coordinator, CHCDC)

### I. Meeting Summary

*Please provide a brief summary of the ISP answers and comments regarding the following questions.*

- What is your affordable broadband offer from the provider (price, speed, eligibility, use requirements, other conditions) for which our residents could be eligible?

#### Response Comment / Answer:

Cox Communications offers Connect2Compete, a discounted Internet service option for eligible households. Connect2Compete costs \$9.95 a month for download speed of 10Mbps and upload speed of 1Mbps. To be eligible for this discounted Internet service, households must have at least one student in grades K-12 living in the household, participate in one of the following government assistance programs: free or reduced lunch through National School Lunch Program, SNAP, TANF, or Public Housing, must not have been subscribed to Cox high-speed Internet service in the last 90 days, and must have no outstanding Cox bills or unreturned equipment. Households can enroll with this service on the phone or online. The plan includes free installation, free equipment, and tech support for the router/modem.

Bulk pricing is available for properties. Through this option, property managers provide Internet for all units; households do not have to meet any eligibility other than being tenants. The price is typically \$15-\$25 a month per household for Internet speed of 50Mbps. Bulk pricing requires a 5-year contract with the landlord and provides coverage to all units regardless of the occupancy status of the unit. The landlord is ultimately responsible for paying the cost of the Internet service. Residents have the option of upgrading their Internet speed and paying the difference.

- What are your goals and plans for marketing your affordable offer to our residents?  
What percentage of subscription would you consider success?



Response Comment / Answer:

Cox Communications will ensure that field representatives have marketing material to provide to property management and residents at Hollywood Palms. For Village View and Metro Villas, Cox will mail out marketing material and verify if the properties have an assigned field representative. Currently, 82% of Hollywood Palms households and 70% of Metro Villas have Internet service with Cox Communications. Information regarding Internet speed and pricing for these households is private and will not be disclosed by Cox Communications.

- What other efforts or assistance are you planning to help get online all residents (digital literacy training, tech support, affordable devices)?

Response Comment / Answer:

Cox Communications offers free installation, free equipment, and modem/router support for households receiving the Connect2Compete discounted internet service. Households have access to digital literacy resources through EveryoneOn.org. Through EveryoneOn.org, Cox works with device refurbishers so that individuals and their families can purchase discounted devices, including desktops, laptops and tablets.

- What funding are you planning to make available to affordable housing organizations to assist in marketing your offer and helping residents subscribe?

Response Comment / Answer:

Marketing materials and field representatives will be available for the properties. Cox Communications also will send material via email to Tricia McKenzie.

- What is your position on the California Advanced Service Fund (CASF) Public Housing Account and why? Should it continue? How much funds should be collected? What are the essential rules that you support to make CASF Public Housing Account workable to get all residents online who reside in publicly-supported housing?

Response Comment / Answer:

Mr. Ian Shifrin is not familiar with the program, however, believes that bulk pricing may be an option to expose families to the Internet and increase access. A quote is provided to interested landlords.

## II. Next Steps

*Please delineate the next steps that both parties agreed to take to get at least 80% of publicly-subsidized housing residents trained and online at home. Please specific timetable and responsible party.*

- Action Step: Cox will provide marketing materials for residents across all CHCDC properties regarding Connect2Compete and EveryoneOn.
- Action Step: Cox will ensure that there are representatives servicing Hollywood Palms, Metro Villas, and City Heights 10 properties.

- Action Step: The CHCDC Resident Services team will distribute and post marketing materials to households onsite and will distribute to additional affordable housing organizations in the area.

### **III. Recommendations**

*Please concisely recommend actions for the California Emerging Technology Fund (CETF) to continue to: (a) assist affordable organizations and their residents on challenges related to access and adoption of high-speed Internet service at home; and (b) foster collaboration with the ISP.*

- Recommendation: We recommend that CETF reach out to engage property management for bulk pricing options, particularly with regard to Affordable Housing policy and the ability to include Internet in rent amount.
- Recommendation: We recommend that CETF discuss with Cox the potential to waive the stipulation that to qualify for the low-income option a client must be disconnected from Cox for 90 days as this will disqualify many residents.