BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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

COMMENTS OF CSU CHICO-GEOGRAPHICAL INFORMATION CENTER ON PHASE I ISSUES (ADOPTION ACCOUNT)

David Espinoza
Broadband Specialist
CSU Chico – Geographical Information Center
35 Main Street, Suite 132, Chico, CA 95928
despinozaaguilar@csuchico.edu

March 16, 2018

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ON PHASE I ISSUES (ADOPTION ACCOUNT)

Pursuant to the Amended Scoping Memo and Ruling of the Assigned Commissioner ("Amended Scoping Memo") in the above-referenced rulemaking docket to consider modifications to the California Advanced Services Fund ("CASF") due to the passage of Assembly Bill (AB) 1665 and proposals from the CASF Staff, CSU Chico-Geographical Information Center hereby files comments on the Staff Proposal contained in Phase I Issues (adoption account).

The CSU Chico-Geographical Information Center (GIC) is the leading organization of the Northeastern and Upstate California Connect Consortia (Consortia) which consists of counties, cities, non-governmental organizations, anchor institutions, public entities and internet service providers, among other partners in the rural Northern California region. Both consortia serve ten rural counties: Butte, Colusa, Glenn, Lake, Lassen, Modoc, Shasta, Siskiyou, Plumas and Tehama. Therefore the CSU Chico-GIC is interested in the development of this proceeding and to actively participate and submit comments. This comments filing includes a letter from Linda Dahlmeier, Mayor of the City of Oroville.

The Consortia has provided comments specific to the proposed rules sections below. We would also like to provide our perspective on the challenges in increasing adoption in rural areas. Adoption can occur in two tiers, 1) with adoption in a home with a new subscription and a computing device a preferable result, and 2) engagement with use of the internet through a community center perhaps an interim step towards that outcome. In our rural communities, adoption of broadband in the home may not be possible, as it is not available. Even if it is available, it is often only through one provider. If that provider's program has barriers for that household (e.g., eligibility requirements that exclude the working poor), there are no other options for that household. In urban areas where there are multiple providers (including hotspots), a household has access to options that can potentially meet their circumstances. In rural areas, the choices are typically one provider, or at best two.

Given these challenges, we encourage the CPUC to consider that adoption in a library, school or other community center has value for low-income citizens. The key is that outreach to the community is robust and the adoption effort is integrated with digital literacy training. It is also important to understand that efforts to increase adoption in rural areas are a new concept. Urban areas have a history and record of success that do not exist in rural northern California. Approaches that work in urban areas cannot simply be transferred to rural areas with similar outcomes.

Adoption success in rural areas will require that program design and deployment are eligible costs (during the ramp up period) so that adoptions can be achieved. Funding for outreach is critical. The expenses associated with travel (including staff time) in sparsely populated regions are significant and difficult to absorb under other programs. A collaborative regional project can address some of these challenges, however developing the materials and tools for the collaboration will require effort and a commitment of funds.

Broadband Adoption Account Comments

- **1.2 Amount Available for Grants:** The Consortia recommends setting aside a percentage or amount for rural communities.

- **1.3 Definitions:** The Consortia recommends expanding the criteria for identifying eligible individuals, communities, and/or households beyond the California Alternate Rates for Energy (CARES) program. The Consortia recommends considering income thresholds 250% above the most recent Federal Poverty Guidelines to include working families not making a livable wage.

- **1.5 Eligible Projects**: The Consortia recommend that combined digital literacy/broadband access projects and collaborative regional be an eligible. Digital literacy and the potential to utilize publicly available computers or to adopt broadband at home are interwoven, and families can benefit both by access to both programs. Allowing one submission and one resulting contract will be an efficient use of CPUC and community-based organization resources. Collaborative projects would also need an extended deployment time frame of at least three years per grant award to allow for successful deployment, implementation and impact analysis (see comments on 1.7 below).

- **1.7 Information Required from Applicants:** Item 2.b. (Digital Literacy and Broadband Access): Schedule for deploying adoption programs states 6 months for a ramp-up period followed by a maximum of 12 months for project deployment. The Consortia recommends extending the deployment time frame to three years to allow for successful deployment, implementation and impact analysis. By limiting the grant period to 18 months, including a six-month ramp-up period, the guidelines would likely end programs as they are becoming most effective, and require a new proposal, review and contracting period. This would be inefficient use of CPUC and community-based organization resources. Three years is a typical period for a State of California grant and is appropriate for this program.

- **1.8 Evaluation Criteria:** The Consortia recommend that actual adoption numbers/targets be deleted as a scoring criterion for Digital Literacy Projects. Digital Literacy Projects as described in section 1.5 Eligible Projects do not include broadband adoption.

- **1.9 Submissions and Timelines:** The Consortia recommends the CPUC to define the review time for project proposals over $50,000.

- **1.12 Other Issues for Comments:**

- *How should the Commission quantify or report on the actual broadband adoption levels from funds expended from the CASF in the prior year?*

- *How should the Commission gather and report the number of subscriptions resulting from the Broadband Adoption Account? How can grantees help track performance metrics for the program?*

  The Consortia recommends collaboration and cooperation from participating providers to quantify or report the number of actual subscriptions resulting from the Broadband Adoption Account. If providers are willing to provide documentation of subscription, with the permission of the subscriber, that will verify the outcome.

  The Consortia also recommends that usage of devices purchased by grant funds to be placed in publicly accessible spaces can be used as a metric for adoption. A software program that would track such usage could be provided to grantees.

- *There is no way to guarantee that education and outreach will effect adoption levels. How can applicants guarantee that their program will result in increased adoption rates among their community?*

  Integration of adoption with digital literacy training is the most robust approach to achieving adoption. If people do not know how to use a tool, how can you sell them that tool? For rural areas, availability of workable low cost offers will facilitate adoption and where those are limited or where broadband access in the home is not available, adoption through community centers should also be considered.

- *How best can we measure the need of a particular community in comparison to any other community with barriers to digital access? How can we compare the different barriers of different socioeconomic groups?*

  We have provided a discussion of the particular rural challenges for adoption, where need is influenced by availability of low cost offers. This is one barrier that could be considered. In these communities, support through digital literacy training, access to community centers and robust outreach will be needed.

- *How can the Commission determine the socioeconomic benefits of the program to the low-income community?*

  Pre and post implementation surveys of program participants can document benefits. The surveys can document (before and after program participation) the participants' understanding of the benefits of the internet and the ways in which they use internet. Potential use cases to be tracked could include job search/application, financial management, civic engagement, education and school communication.

WHEREFORE, CSU Chico-Geographical Information Center respectfully requests the Commission amend its CASF proposals contained in Appendix B as set forth above in these comments.

Respectfully submitted,

/s/ David Espinoza

David Espinoza
Broadband Specialist
CSU Chico – Geographical Information Center
35 Main Street, Suite 132, Chico, CA 95928
despinozaaguilar@csuchico.edu

March 16, 2018

CPUC CASF Public Forum - Oroville – Public Comment
Wednesday, March 14, 2018

Good morning,

My name is Linda Dahlmeier, and I am representing the City of Oroville as Mayor, business owner and long-time resident. Thank you for holding this meeting in Oroville and providing the opportunity to hear from the Northern California region. I would like to address the Commission today regarding the importance of broadband in rural Northern California.

Access to high-speed Internet has changed from being something that was an optional luxury for entertainment to an essential tool for saving money, doing well in school, training for high-demand and higher-paying jobs, competing in business, managing health care and health insurance, participating in civic issues and much more. Most people in the United States are connected to broadband. Many of them even have several devices. However, it is the people who need the access the most who do not have it. Residents of rural Northern California, who are already facing barriers in getting equitable health, education and economic opportunities, lack access to high-speed internet. Broadband is taking its place alongside water, sewer and electricity as essential infrastructure for communities. Rural Northern California lacks the infrastructure needed to close the increasingly expanding digital divide. Rural Northern California is being left behind – Oroville is being left behind.

Rural Northern California historically and continually faces economic and social challenges. Unemployment and poverty rates are consistently higher than that of the state of California and the nation. Rural Northern California's median household income is also lower than the state and the nation. Household income is strongly associated with in-home internet connectivity levels, with low-income households being less connected than higher-income households. Poverty impacts a household's ability to utilize broadband.

Oroville suffers from all of these challenges. Residents are struggling and businesses are constrained by inadequate or no high-speed internet. Businesses cannot grow and create more and higher-wage jobs. With limited jobs, residents cannot improve their economic status and pull themselves out of poverty. Students are struggling in and outside of school. Standardized test results are skewed because disruption in internet service during the day. When students leave at the end of the day, they cannot complete their homework because of limited or lack of internet. Broadband technology is needed to overcome these barriers.

Another pressing issue is the scarcity of broadband in rural Northern California limiting emergency services' communication capacity and response capability. We saw firsthand the dangers no communication during the fire evacuations in Paradise. Residents were unclear what zones should evacuate because the poles burned cutting all methods of communication. After evacuation, people were missing and unaccounted for because of communication problems. Last year, our entire region was jeopardized during the dam crisis. Communication, particularly through broadband technologies, is critical for saving lives in times of disasters. As FirstNet unfolds in the state of California, it is imperative that our rural regions are not forgotten and the lack of coverage is addressed.

Recently, AB 1665 was signed by the Governor. As the Commission works through the rule making process for the California Advanced Services Fund, I implore you to consider the needs of our citizens in rural Northern California over the telecommunication providers. At the very least, encourage their participation in our region. Do not hold our citizens hostage and prevent them from having access to the resources needed to live a productive and healthy life. Consider our citizens and their right to have a future and not be left behind.

Thank you for your attention on this important matter.