

**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 TECH EXCHANGE
ON PHASE I ISSUES**

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March 16, 2018

Extend the Broadband Adoption Account maximum length to 2 years. In Tech Exchange's experience, it takes time, energy, and resources to launch a new project, have it function well, and develop a sustainable funding mechanism to ensure prolonged impact. To be successful, the first year of a project must be focused on program development and building operational structures. With a 12 month project timeframe it is certainly possible to achieve set goals and have a measurable impact, but what is lost is the sustainability planning for the project to continue after the grant period ends. A longer timeframe is needed to cultivate funding, collect impact data for development, and align community resources to sustain the project. Extending the project length to 2 years would allow organizations to serve more clients, devote CASF funding more directly to the operation of programs and not the ramp-up and development of them, and lastly give organizations a much needed runway to cultivate additional funding to ensure the project is not a blip of service in our communities that need more sustainable supports.

Increase the Broadband Adoption Account expedited review to \$100,000 per project. In conjunction with our recommendation to extend the timeframe of projects to 2 years, Tech Exchange also recommends increasing the per project maximum for expedited review. Digitally-dark households are in urgent need of services; a higher maximum would ensure larger populations are provided services more quickly, and would provide necessary resources for extending services beyond 12 months.

Lower device subsidy level outlined on page 4 of Appendix B to \$500 per computer with a maximum of 15 computers for site-based technology. Tech Exchange recommends resources be

more fully directed towards individuals' home technology needs. In our experience, a lab of 15 computers costing \$500 or less is adequate infrastructure for trainings. Maintaining a higher subsidy level would encourage organizations to apply for CASF funding with priority of refreshing a computer lab; the priority of applicants should be to provide broadband adoption services and training with requests for subsidizing site-based computers in service of that goal.

Establish a Broadband Adoption Account grantee learning community. Organizations providing community services funded through the Broadband Adoption Account would benefit from opportunities to share best practices and receive input and guidance from peer organizations on project challenges. Tech Exchange recommends the CPUC organize forums and workshops to convene organizations engaged in offering adoption services.

Extend the maximum age of a refurbished computer subsidized in the Public Housing Account (Appendix B, page 29) from 2 years old to 5 years old as proposed in the Adoption Account (Appendix B, page 7). In Tech Exchange's experience, adding additional RAM and installing a light-footprint operating system to a computer that was originally manufactured with high specifications greatly extends useful life beyond 2 years.

WHEREFORE, Tech Exchange respectfully requests the Commission amend its CASF proposals contained in Appendix B as set forth above in these comments.

Respectfully submitted,

/s/ Seth Hubbert

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