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

Order Instituting Rulemaking to Consider
Modifications to the California Advanced
Services Fund.

R. 12-10-012
(Filed October 25, 2012)

**OPENING COMMENTS OF THE GREENLINING INSTITUTE
TO THE ASSIGNED COMMISSIONERS' REQUESTING COMMENTS ON
BROADBAND INFRASTRUCTURE RULES AND APPLICATION WINDOWS –
QUESTION 1**

Vinhcent Le,
Legal Counsel
The Greenlining Institute
360 14th Street, 2nd Floor
Oakland, CA 94612
(510) 898-2053
vinhcentl@greenlining.org

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I. INTRODUCTION

Pursuant to Assigned Commissioner Martha Guzman Aceves' March 26, 2020 Ruling, Assigned Commissioner's Ruling Requesting Comments on Broadband Infrastructure Rules and Application Windows (ACR) in Rulemaking 12-10-012, the Greenlining Institute (Greenlining) submits the following opening comments on Question 1 of the ACR which asks, what should the Commission do in response to COVID-19? The Commission should use CASF resources to fund the distribution of laptops and hotspots across California. These efforts should focus on amplifying the impact of existing device distribution efforts by schools and libraries. The Commission should also collect data on internet usage and outages during California's shelter in place orders.

II. DISCUSSION

A. The Commission Should Provide CASF Adoption Grants to Schools Distributing Laptops to Students.

Greenlining supports the Commission's efforts to use California Advanced Services Fund (CASF) resources to assist Californians affected by the COVID-19 crisis. CASF's purpose is to bridge the digital divide; therefore, this assistance should focus providing computing devices or internet hotspots to Californians that must shelter in place. One way to do this would be to work with schools and libraries to distribute laptops to students in need.¹ With California schools closed across the state, students are transitioning to distance learning; however, **20 percent of all California students do not have internet access at home.**² This access gap means that already disadvantaged students are falling even further behind. To remedy these gaps, the Los Angeles

¹ When Californians were asked why they did not have internet at home, fifty-one percent responded that they lacked a computer at home or that internet access was too expensive. See CETF 2019 Annual Survey available at http://www.cetfund.org/files/002_CETF_2019_002_IGS_Poll_CA_Digital_Divide_ppt.pdf

² <https://edsources.org/2020/thousands-of-california-students-to-get-free-wifi-and-chromebooks-for-distance-learning/627823>

Unified School District made emergency purchases for \$10 million worth of laptops so that their students can do remote learning.³ Marin school districts have programs to distribute Wi-Fi hotspots to students that lack internet, Marin tapped into a \$1 million emergency grant to pay for it, indicating schools have funding needs that CASF could help fill.⁴ Statewide, the California Department of Education is working with Google to distribute four thousand Chromebooks and 100,000 Wi-Fi hotspots to students in need, but this effort will only cut number of students without access to the internet at home by half.⁵

Greenlining proposes that the Commission use CASF funds as a way to supplement existing efforts to close the digital divide among students affected by COVID-19 school closures. The Commission can do this by working with the Department of Education to encourage schools and libraries to apply for the CASF Adoption account's take-home computing device subsidy which would allow them to purchase entry-level Chromebooks and Windows laptops for students to take home and keep. Greenlining is supportive of Commission efforts to furnish hotspot devices, however, the Commission should request that internet providers provide these hotspots with three months of service at no cost. This will allow the Commission to avoid conflicts with Public Utilities Code Section 281(j)(6) which prohibits using Broadband Adoption Account dollars to subsidize service.⁶

Focusing CASF COVID-19 grants on educational institutions has several benefits. First, it ensures CASF funding for computing devices go to those that need it most. Schools have ongoing relationships with their students and teachers are likely to know which students lack

³ <https://www.dailynews.com/2020/03/18/during-coronavirus-school-closures-distance-learning-may-only-exacerbate-academic-inequities/>

⁴ <https://www.marinij.com/2020/03/30/coronavirus-exposes-marin-schools-digital-divide/>

⁵ <https://edsource.org/2020/thousands-of-california-students-to-get-free-wifi-and-chromebooks-for-distance-learning/627823>

⁶ Alternatively, the Commission should use non-Adoption account dollars from CASF or other Commission programs to fund service on these hotspots.

internet access at home. Schools also are more likely to have already begun preparing laptop distribution programs, CASF grants can plug into these existing programs and allow school districts and libraries to purchase more than they could alone. Working in parallel to support existing pandemic response efforts allows CASF funding to have an impact faster. Finally, providing laptops to students in need helps encourage long-term broadband adoption among families deterred by the upfront cost of computing devices.

The success of the Commission's COVID-19 response efforts will require Commission outreach and changes to the application process. Greenlining suggests the following, non-exhaustive, list of actions that the Commission should consider to support this effort:

- Award COVID-19 related Adoption grants on a rolling basis to speed up response times.
- Purchase advertising and perform outreach to increase awareness around the availability of Adoption account grants for schools and libraries to purchase devices.⁷ The Commission should encourage schools and other qualifying organizations to use the expedited review process. Outreach should also be on California's government websites, on educational websites⁸ and the Commission should encourage public officials promote this program during California's COVID-19 press conferences and press releases.
- Limit the duration of COVID-19 related Adoption grants to one year and reduce the reporting requirements accordingly.

⁷ Greenlining encourages the Commission to look into low-cost or free advertising channels to promote the program.

⁸ See e.g. edsources.org, edutopia.org etc.

- Increase the take-home device subsidy to \$250 per device and increase the limit to two per household. A review of online retailers reveals that the most affordable and widely available entry-level ChromeBooks cost between \$180-300.⁹
- Raise the grant cap for expedited review from \$100,000¹⁰ to \$250,000 for educational institutions and other eligible organizations responding to COVID-19 computing needs. This would allow each school district or school to purchase a maximum of one thousand laptops per grant (assuming \$250 per laptop).
- Increase the \$10,000 cap for take-home devices to \$250,000 for schools, libraries and other educational institutions. Increase the cap to \$30,000 for community organizations that apply to distribute take-home devices.
- Provide greater up-front costs to organizations that purchase and distribute take-home devices.
- Modify Adoption account rules to allow grantees to distribute devices without a digital literacy component.
- Collect and report data on the number of devices issued as part of this program.

The above changes will help speed up the CASF Adoption grant process and allow the Commission to help families affected by the pandemic faster.

⁹ See e.g. <https://www.google.com/chromebook/device/acer-chromebook-11-cb311-8h/>

¹⁰ Appendix 1.11(c) limits expedited review to grants for \$100,000 or less.

B. The Commission Should Collect Data on Network Performance and Outages

Greenlining recommends that the Commission collect network performance and outage data from ISPs in order to understand how different networks and broadband technologies are responding to increased demand during the pandemic. Internet outage and performance data will allow the Commission to understand how California's internet infrastructure performs under high stress and can inform the Commission as it reviews CASF Infrastructure grant applications. Additionally, Greenlining had the opportunity to review the comments the Electronic Frontier Foundation (EFF) is filing on this topic and Greenlining supports EFF's comments.

III. CONCLUSION

The COVID-19 pandemic and California's shelter in place orders place significant burdens on Californians that lack access to the internet and computers. This burden is especially pronounced for low-income students across the state. The Greenlining Institute urges the Commission to act quickly to support their connectivity needs.

Respectfully submitted,

/s/Vinhcent Le
Vinhcent Le
Legal Counsel
The Greenlining Institute
360 14th Street, 2nd Floor
Oakland, CA 94612
(510) 898-2053
vinhcentl@greenlining.org

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