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

*Order Instituting Rulemaking Regarding
Broadband Infrastructure Deployment and
to Support Service Providers in the State
of California.*

Rulemaking 20-09-001
(Filed 09/03/21)

**OPENING COMMENTS OF UNITE-LA, INC ON THE ASSIGNED
COMMISSIONER RULEMAKING FOR MIDDLE MILE BROADBAND
INFRASTRUCTURE DEPLOYMENT**

September 3, 2021

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I. INTRODUCTION

UNITE-LA, Inc, a nonprofit organization dedicated to ensuring the continuous improvement of effective and aligned cradle-to-career public education and workforce development systems in Los Angeles and co-lead of the Los Angeles Digital Equity Action League Consortium (LA DEAL), respectfully submits these opening comments (“Comments”) on the Order Instituting Rulemaking Regarding Broadband Infrastructure Deployment and to Support Service Providers in the State of California (R.20-090-01).

II. BACKGROUND

Along with the Los Angeles County Economic Development Corporation (LAEDC), for the past six months, UNITE-LA, Inc has regularly convened cross-sector leaders from government, communications, education, nonprofit, health, housing, philanthropy and business, including over 100 representatives from municipalities, COGs, the County of Los Angeles, Internet Service Providers (ISPs), Institutions of Higher Education, Local Education Agencies, healthcare business, public housing organizations, immigrants rights

nonprofits, among others. In between formally facilitated convenings, we have had conversations with community leaders who are deeply imbedded in underserved and unserved communities across Los Angeles County and are trusted messengers for those they serve. The purpose of our convenings is to understand the challenges communities face in accessing and adopting internet service, as well as to identify opportunities to address those challenges.

III. COMMENTS

Having access to affordable AND high-quality internet options has been a leading barrier to greater adoption for Angelenos who aren't currently connected. A March 2021 CETF-USC statewide broadband adoption survey *Internet Adoption and the "Digital Divide" in California* by Hernan Galperin and Thai V. Le found that 11 percent of households in Los Angeles County are unconnected and an additional 8 percent are under-connected (only using internet through a smartphone); that is, 19 percent of households aren't sufficiently connected in order to fully participate in and benefit from the economy, education, workforce, civic opportunities, health care, government programs, and so many other things. According to a USC Annenberg policy brief from April 2020, *Covid-19 and the Distance Learning Gap*, 27 percent of K-12 households - approximately 250,000 households - do not have a desktop or laptop computer and broadband at home. With over 1.4 million K-12 students in L.A. County, a large proportion of California's future is getting left behind.

Many partners to the LA DEAL have responded to Angelenos' need to be connected with short-term solutions. One example from the Partnership for Los Angeles Schools (PLAS) demonstrated the difficulties their low-income families faced when trying to access free and low-cost offers from ISPs. There was limited or no service in their zip codes, mandatory deposits, installation fees, and pricey long-term contracts. And while PLAS was able to serve as an intermediary between ISPs and their families, buying hundreds of internet service plans in bulk in order to provide their families in Watts, South LA, and

Boyle Heights with free service, it is a bandaid solution to an issue that needs systemic change.

To reach full adoption, our region needs sustainable solutions that lead to access to affordable and high-quality internet for EVERY household in Los Angeles – not just unserved households. Affordability and quality are driven by increased competition and innovation. The current model of broadband deployment has stymied competition in underserved communities, so that many of the LA DEAL’s partnering organizations have complained that if their clients have an option, they only have one option, and it is unaffordable. These communities include the aforementioned Watts, South L.A., Boyle Heights, and also include Compton, South East L.A., Lynwood, Willowbrook, Florence-Firestone, Lennox, Huntington Park, Pacoima, Hawaiian Gardens, Paramount, and Bellflower.

Open-access middle mile infrastructure, allowing for public-owned infrastructure and public-private partnership infrastructure models will promote greater competition. We have heard stories of innovation that has systematically solved for low adoption among low-income communities, including municipal-run and municipal-leased networks.

Dated: September 3, 2021

Respectfully submitted,

/s/ David Rattray

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