



**NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE
OAKLAND BRANCH**

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September 1, 2021

Attn: Commissioner Martha Guzman Aceves
California Public Utilities Commission
Public Advisor's Office
505 Van Ness Avenue
San Francisco, CA 94102

Dear CPUC Commission,

We write to urge your reconsideration of SB 156's proposed Middle Mile Fiber map in Oakland.

The NAACP is the nation's largest and oldest civil rights organization. Since our inception, we have promoted education as a pathway to opportunity and access to the full rights and duties of citizenship. All too often, however, factors outside of their control have deprived Black students of the resources needed to access the education to which they are entitled. When the pandemic hit Oakland, existing disparities in digital access were laid bare and the injustice became too visible to ignore as "distance learning" was simply out of reach for those without equitable access to technology.

For weeks, the school district - aided by community-based organizations like the NAACP - searched tirelessly for students who lacked digital access and for families financially disconnected due to the economic downturn. Oakland rallied to resource emergency stopgap measures: school-loaned computers, refurbished devices, internet hotspots, and technical support to tens of thousands of Oakland students and families. Despite these odds, Black students continue to harness the wisdom and resilience of our community to navigate a system not designed for their success. Many students went to great lengths to access learning, attending classes in McDonald's parking lots to access adequate Wifi or attending community learning pods amidst the height of the pandemic. While we applaud their industriousness, we also recognize that it doesn't have to be this way.

The aforementioned temporary solutions failed to address the underlying causes of the digital divide. Decades of divestment from marginalized communities has undermined capital infrastructure to build reliable, sustainable, broadband solutions.

SB 156 has the potential to make the most progress towards closing the digital divide in our state's history, but only if middle mile fiber is laid in communities like ours, long overlooked by private investment. Highway I-880 and Route 185 (International Boulevard/"East 14th") bisects our most under-resourced communities, yet it is ostensibly absent from CPUC's proposed map. Without state investment, the students in these areas will continue to rely on the temporary, stopgap, commercial internet hotspots distributed by our school district that will last until the COVID funds expire. The connection from these hotspots can average speeds below 5 Mbps, hardly enough to run the types of applications and learning software necessary to prepare our students for college and career, and well below the 100 Mbps threshold in SB 156. The time for meaningful investment is now.

Open access, state-owned, middle mile fiber along the I-880 or International Boulevard could provide access to higher speeds and reduce costs enough to ensure Oakland closes to digital divide for good. The availability of this service would spur investment in our community and bring opportunities for families and students alike.

Installation should be guided by two principles: future-proofing and maximum flexibility. Since the majority of costs associated with fiber projects are incurred during excavation, CPUC should add additional conduit for future expansions, and pull at least 488 count to start. The conduit design should support future network scenarios by adding splice points and handholes at every major intersection or other likely future hub locations.

CPUC should prioritize dense population centers that have been historically marginalized and offer the greatest return on investment. An eight to ten mile stretch of fiber line through this district could support connectivity of tens of thousands of residents who for too long have been left behind amidst Silicon Valley's economic boom.

Include I-880 from Oakland's Downtown south to Route 185 (International Boulevard/E.14th) through East Oakland and into San Leandro on your next map. Do what is right.

In Service,

A handwritten signature in black ink, appearing to read "George Holland, Sr.", with a stylized, cursive script.

George Holland, Sr.
President, Oakland Branch NAACP
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