

**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 October 15, 2021)

**GREAT PUBLIC SCHOOLS NOW (GPSN) REPLY COMMENTS ON
ADMINISTRATIVE LAW JUDGE’S RULING ORDERING ADDITIONAL COMMENTS
AS PART OF MIDDLE-MILE DATA COLLECTION**

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I. Introduction

Great Public Schools Now (“GPSN”) respectfully submits these reply comments in response to opening comments to the Assigned Administrative Law Judge (ALJ) ruling issued September 9, 2021, with additional questions related to the Commission's Middle-Mile Data Collection,

II. The Commission Should Disregard Assertions that Low Income Households Would Prefer Not to Have Broadband Access

In opening comments in response to the ALJ’s September 9, 2021 Ruling, CTIA asserts that the reason low-income Californians do not have broadband access at home is that they would prefer not to:

Low-income Americans’ preference for mobile broadband as their single broadband solution is demonstrated by studies showing that wireless is currently the only broadband connection for over a quarter of low-income households.¹

¹ CTIA Opening comments, P2 (<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M411/K463/411463308.PDF>)

The California Emerging Technology Fund’s Statewide Survey on Broadband Adoption 2021 reported that 94% of Californians who did not have broadband subscription at home were unconnected for reasons other than “[a] smartphone is enough.”²

A report released by the University of Southern California surveying students and families in low-income communities found that quality connectivity was the most significant barrier to student performance as compared to students with fixed internet access. It found that a lack of reliable internet caused “lower student engagement, lack of motivation and lower school work completion.”³ Students with a reliable broadband connection completed their schoolwork 36% more than students without broadband access. When families were asked about the importance of internet access support, 22% indicated it was *important* while 74% said it was *very important*. According to a teacher poll released by the Educators for Excellence Los Angeles, 90% of teachers across all school types, grades, and student income levels reported that lack of access to high-quality internet was a serious barrier to distance learning.⁴ Additionally, a survey by AltaMed on the impact of the pandemic on Southeast Los Angeles found that “roughly 1 in 2 (45.7%) [families] expressed concern about the quality of education their child(ren) has/have received over the course of the pandemic, and respondents whose family has not experienced

² Statewide Survey on Broadband Adoption 2021, P20;
https://www.cetfund.org/wp-content/uploads/2021/03/Annual_Survey_2021_CETF_USC_Final_Summary_Report_CETF_A.pdf

³ When school comes home: How low-income families are adapting to distance learning, University of Southern California 2020, P7-20;
<https://rossier.usc.edu/wp-content/uploads/2020/10/USC-Report-When-School-Comes-Home-Aguilar.pdf>

⁴ 2020 Voices from the Virtual Classroom: A Survey of Los Angeles Educators, P6;
https://e4e.org/sites/default/files/la-teacher_survey_2020_digital_.pdf

COVID-related impacts reported similar rates (42.5%) of concern.”⁵ Given the lack of quality internet access in the Southeast Los Angeles area, it is not surprising that families responded this way when their children’s education was exclusively online for over a year.⁶

Families made it clear to us that internet access is a major barrier to their ability to lead thriving lives, and the pandemic exacerbated digital inequities when our entire world went online. Families, especially our students, were left out as a direct result of their internet access. It would be preposterous to suggest that the fact that the pollution burden is generally highest in lower income communities is evidence that lower income Californians have less preference for breathing clean air than their higher income neighbors. Similarly, the fact that lower income households make do without a broadband subscription should not be read as evidence that their preferences for broadband access are any different than their higher income neighbors, who enjoy nearly universal adoption of wired broadband subscriptions at home.⁷

As multiple Parties noted in response to the Assigned Commissioner’s Ruling August 6, 2021, opening the public comment process to collect recommendations for locations for a statewide open-access middle-mile broadband network, the proposed Anchor Build Fiber Highways map under consideration bypassed the Los Angeles communities most impacted by the digital divide. The Los Angeles Economic Development Corporation (LAEDC) correctly noted that,

⁵ Impact of COVID-19 on the Education of SELA Families 2021, P26;
<https://www.altamed.org/file/10467/download?token=aD1EjY22>

⁶ USC Annenberg Research Network on International Communication, Home Broadband in Los Angeles County 2016; <https://arnicusc.org/publications/c2ig-policy-brief-1/>

⁷ Digital divide persists even as Americans with lower incomes make gains in tech adoption, Pew Research Center June 22, 2021;
<https://www.pewresearch.org/fact-tank/2021/06/22/digital-divide-persists-even-as-americans-with-lower-incomes-make-gains-in-tech-adoption/>

“... to ensure that our most underserved communities can get connected, it is imperative that the proposed route does not disregard the CA-110 and US-101 corridors in Los Angeles County. These highway corridors serve large areas of under-connected households. The current iteration of the map does not include significant segments of these corridors, and if this route is not revised to extend to these communities, a large of portion of our population, including in South LA, who are historically underserved digitally, economically and otherwise, will not be able to access the benefits of an open-access middle-mile network to help bring them affordable high-speed internet.”⁸

California Community Foundation (CCF) opening comments in the same ruling offered more detail:

The proposed segments along US Highway 10 and State Highway 110 in Los Angeles County will bypass some of the least-connected communities in Los Angeles County and pick up again in some of the best connected. For example, the proposed CA110 segment includes South Pasadena, a predominantly white community of census tracts with 60%+ and 80%+ 25/3 adoption rates, but bypasses census tracts in Jefferson Park, a predominantly Black community with 20%+ and 40%+ 25/3 adoption rates. Similarly, the proposed US10 segment includes Santa Monica, a majority white community in which all census tracts have at least 60%+ 25/3 adoption, but bypasses entirely tracts in the Alvarado Terrace Historic District and Koreatown, predominantly Black and brown communities with just 20%+ 25/3 adoption rates.⁹

GPSN’s qualitative and quantitative research on the digital divide in the Los Angeles communities we serve confirms the assertions of LAEDC and CCF. Communities in Schools of Los Angeles (CISLA), an organization with a service population of nearly 90% low-income families, including South LA and Watts, had to completely pivot their organizational focus in response to the pandemic’s exacerbation of digital inequity. They were forced to respond by resourcing students with temporary, district-sponsored hotspots and devices due to scarce access

⁸ Los Angeles Economic Development Corporation opening comments to Aug 6 Assigned Commissioner’s Ruling, P6; <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M407/K793/407793980.PDF>

⁹ California Community Foundation opening comments to Aug 6 Assigned Commissioner’s Ruling, P9; <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M407/K739/407739011.PDF>

to broadband services.¹⁰ United Parents and Students, an organization serving families south of the 110 freeway, including South LA and East LA, witnessed a massive digital divide “wreaking havoc on learning outcomes for those already receiving the least amount of resources: Black, Indigenous, Latino and poor students.”¹¹ Alliance for a Better Community (ABC) published their 2021 Latino/a Scorecard Report, which made “clear that many Latino/a families in Los Angeles could not afford high-speed internet at home and did not have the devices needed for education and for professional applications.”¹²

GPSN urges the Commission to give significant weight to the data presented in this docket regarding the communities of color and the poor communities that have been left behind by the incumbent providers and the status quo. The state’s Middle Mile *and* Last Mile investments should serve to remedy, rather than double down on, the decades-long patterns of neglect Los Angeles’ lower income communities have suffered. The students and families served by GPSN and our network of community-based-organizations deserve nothing less.

III. Conclusion

GPSN expresses its gratitude to the Assigned Commissioner, ALJ, and Commission Staff for their consideration of equity in these proceedings, and for the opportunity to advocate on behalf of Los Angeles’ students and families.

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¹⁰ Communities in Schools of Los Angeles 2020 Annual Report, P6-22;
https://www.cislosangeles.org/uploads/1/0/0/4/100406076/cisla_2020annualreport_final_digitalversion.pdf

¹¹ Here are solutions to close the digital divide and give our students a chance 2020;
<https://blackvoicenews.com/2020/10/31/here-are-solutions-to-close-the-digital-divide-and-give-our-students-a-chance/>

¹² The Latino/a Scorecard Report: A Policy Roadmap for Transforming Los Angeles 2021, P30;
https://afabc.org/wp-content/uploads/2021/08/ABC_2021_Latino-Scorecard_081621.pdf

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Respectfully submitted,

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