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Pennsylvania Broadband Development Authority
Commonwealth Keystone Building
400 North Street, 4th Floor
Harrisburg, PA 17120-0225

Next Century Cities applauds the PBDA's efforts to ensure that all Pennsylvania residents have the skills, devices, and connections needed to equitably participate in society.[1] Building lasting relationships with community organizations and local leaders who work directly with residents could help the PBDA ensure that the plan is sustainable in the long run.[2]

Table of Contents

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[1] Next Century Cities is a nonprofit nonpartisan 501(c)(3) coalition of over 200 member municipalities that works collaboratively with local leaders to ensure reliable and affordable broadband access for every community, while helping others realize the economic, social and public health importance of high-speed connectivity.

[2] These comments were informed by model comments from the Keystone Internet Coalition. *See* Kate Rivera, *Sample Public Comments on the PA Digital Equity Plan* (Dec. 29, 2023), http://www.tlcphilly.org/blog/sample-public-comments-on-the-pa-digital-equity-plan.

I.   **Section 6.1: Goal 1 - Get People Online**
        a. *Strategy 1.1*

Given the uncertainty surrounding whether the Affordable Connectivity Program ("ACP") will continue, the PBDA should pursue alternative possibilities for state funding to support households that will be disenrolled from the program. For example, the PBDA could explore a partnership with the Pennsylvania Public Utility Commission to review state mechanisms for long-term Internet subsidization. Additionally, the PBDA should encourage affordability in its infrastructure investment programs by promoting competitive service offerings, like open access networks.

This Strategy could be revised to something broader such as "Advance affordable connectivity across the Commonwealth and support residents to sign-up for low-cost options." Examples of other actions include: 1) Funding organizations to conduct marketing and outreach campaigns (including multilingual efforts) in communities to raise awareness of low-cost Internet options and provide enrollment support. 2) Funding free public wi-fi networks in areas that are considered served but have a significant number of disconnected households.

The PBDA should consider implementing strategies focused on specific covered populations or groups with similar needs, such as working with the affordable housing community to research, launch, and fund an Affordable Housing Connectivity Program.

        b. *Strategy 1.2*

PBDA should also include a provision for updating minimum download/upload speeds as technology and standards change. The FCC is currently considering a proposal to increase minimum broadband speeds to 100/20 Mbps. Next Century Cities encourages the PBDA to go further and adopt a 100/100 Mbps standard for broadband.

        c. *Strategy 1.3*

Community Anchor Institutions ("CAIs") in areas with high concentrations of covered populations should be funded proportionally to the covered populations they represent and their need. In communities without traditional anchor institutions, like schools and libraries, the PBDA must consider alternative venues where residents can convene, access information, and get online. Potential partners include faith communities, local nonprofits, and businesses.

II.   **Section 6.1: Goal 2 - The Right Tools**
        a. *Strategy 2.2*

The PBDA should establish minimum standards for devices to ensure that distribution programs are impactful and sustainable. Grantees should articulate strategies for providing residents with high-quality devices to meet household needs. Additionally, grantees should ensure that a portion of funding supports assistive technology for residents who need more than a tablet or computer to use technology accessibly. The U.S. Census Bureau estimates that nearly eight percent of Pennsylvania residents do not have a desktop, laptop, tablet, smartphone, or other Internet connected device. Setting more specific goals will help the PBDA measure the program's impact over time.

Since funding from the Digital Equity Act and Capital Projects Fund will expire within the next several years, the PBDA should encourage recipients of flexible state funding to include device purchasing as part of related programs for long-term sustainability. Likewise, the PBDA should encourage other state agencies to include a budget line item for devices in their grant programs, such as the Departments of Labor and Industry, Aging, and Education.

  b. *Strategy 2.3*

The PBDA should revise this strategy to "Scale device recycling and refurbishing throughout the commonwealth by funding device refurbishing programs and building partnerships to increase access to devices." Leveraging existing industry partnerships and exploring state partnerships with device recyclers and refurbishers can increase the number of high quality devices being distributed to residents across the state. See State of Maine Digital Equity Plan and State of Michigan Digital Equity Plan (DRAFT) for exemplary recycling and refurbishing strategies in their respective implementation plans.

  c. *Strategy 2.4*

This strategy should more broadly address the need for a comprehensive communications plan that not only includes information on the PBDA's website but encourages (and ideally funds) communication and outreach about free and low-cost device access programs by other state agencies, local government, nonprofits, and others.

  d. *Strategy 2.5*

While technical assistance and device repair are important components that should remain in the plan, all grantees that distribute devices may not have the capacity, or be ideally suited, to providing it. Funding device refurbishers and other appropriate organizations to provide technical assistance and device repair services ensures that households will have access to vital assistance and repair services regardless of where a device is obtained. PBDA should also work with industry experts to establish guidelines and standard definitions for level 1-3 technical support.

III. Section 6.1: Goal 3 - Grow Skills

  a. *Strategy 3.1*

As the PBDA highlights, residents living across the Commonwealth do not have equitable access to community resources. Partnering with community organizations from each county in the Commonwealth could help the PBDA identify a strategy for ensuring that digital resources are available regardless of what types of anchor institutions exist in a given area. In addition to the potential partners outlined in the Plan, the PBDA should ensure that Historically Black Colleges and Universities and Minority Serving Institutions are also included in all digital equity planning efforts.

The strategy could be edited to "Create a statewide plan for every county to have digital navigation services commensurate with the needs of the covered populations in their area." With this, the associated actions could be focused on convening a working group of state, local, and national digital navigation experts to inform the development of the blueprint/standard. Funding entities to coordinate digital navigator programs across the state or regions is also a critical consideration for increasing digital equity across the state. The revised strategy could also incorporate the current Strategy 3.3 as an Action. A final Action for consideration is to explore creating Digital Navigator state-funded jobs that are housed within public locations like libraries, CareerLinks, CAIs, etc.

      b. Strategy 3.2

The emphasis on meeting people where they are with digital skills is important, including "pre-101" digital skill building all the way up to more advanced skills. PBDA should ensure funds are disbursed based on percentage of population representing covered populations to ensure equitable access to programs.

The PBDA should work with industry experts to create digital skills curriculum resources and recommend platforms to be used across the state (such as Northstar Digital Literacy). Guidelines should not be too restrictive but should guide grantees to best practices and widely recognized resources.

Working with other state departments and agencies to incorporate funding for digital skills training into other grant programs can provide new insights into how certain policy decisions can impact Pennsylvania residents. For example, adult education or workforce grants, to leverage and maximize sustainable funding for digital inclusion programming after DEA funds are expended. Working with the PA Department of Education on a K-12 strategy is important as well.

IV.   Section 6.1: Goal 4 - Stay Safe and Secure

Privacy and cybersecurity are both imperative to achieving the PBDA's goal of promoting safe and secure online connections. The PBDA should consider how strategies will inform education and training for residents across the Commonwealth and hold entities that create unsafe and predatory conditions accountable for their actions.

      a. Strategy 4.1

PBDA should help community partners find trusted curriculum and resources that agencies and organizations can use to provide high quality cybersecurity and privacy training. Training should focus on a broad range of skills and outreach should include partners working in a variety of sectors, including K-12, post-secondary, and adult education. PBDA funding should include support for training through existing community partners, who can serve as trusted messengers.

      b. Strategy 4.3

Beyond the specific DoBS financial security training, PBDA should commit to exploring other partnerships and training modules as well as produce and release public service announcements about online safety.

V.   Section 6.1: Goal 5 - Strengthen the Foundation

      a. Strategy 5.1

The PBDA should build upon the many efforts to connect with residents and community leaders across the Commonwealth. Maintaining transparency around the PBDA's progress toward digital equity goals and open communication and feedback channels is imperative to the Plan's success. Furthermore, the PBDA should continue surveying residents to track progress and understand remaining gaps over time. Further thought should be given to how smaller entities may be awarded funds with this support. Also determining in what instances smaller entities would best be involved in a larger partnership rather than awarded funds separately (so that this strategy complements rather than conflicts with the emphasis on partnerships in strategy 5.3) is crucial for the effective and efficient use of state funding.

Sector capacity building should be an important strategy beyond specific technical assistance for smaller orgs. PBDA should fund not only direct services and outreach to community members, but also best practice and resource sharing between organizations in the service of higher-quality outcomes.

      b.   Strategy 5.2

Creating a Digital Equity Readiness Checklist is a great start, however PBDA should consider supporting every county or region in planning efforts that will prepare them to develop their own digital equity plan and asset map (North Carolina's Division of Broadband and Digital Equity is an example of this type of partnership).[3] Highlighting model surveys and the local digital equity plans outlined in the Plan on a resource page as the Colorado Department of Local Affairs does with broadband plans, could equip communities embarking on digital equity planning with the tools to develop plans of their own.[4]

      c.   Strategy 5.3

The scoring rubric should be developed so that resources will be dedicated where there is greatest need and PBDA should allocate resources proportionately to covered populations, in an equitable manner. The emphasis on partnerships that can reach multiple covered populations with a variety of services is a strategy that was proven successful with Broadband Technology and Opportunities Program funding.

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[3] *See* North Carolina Dep't of Information Technology, *Division of Broadband & Digital Equity* https://www.ncbroadband.gov/ (last visited Jan. 8, 2023).

[4] *See* Colorado Dep't of Local Affairs, *Broadband Programs*, https://broadband.colorado.gov/dola-broadband-program#:~:text=The%20Department%20of%20Local%20Affair,Promotes%20inter%2Djurisdictional%20communication (last visited Jan. 8, 2023).