

**RESPONSE TO REQUEST FOR INFORMATION:  
PARTNERSHIP FOR DEPLOYMENT OF BROADBAND SERVICES  
IN CUYAHOGA COUNTY, OHIO  
January 15, 2021**

**SUBMITTED TO:**

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Nonprofit, Nonpartisan Organization  
Project of New Venture Fund  
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Dear Ms. Tkachyk:

We applaud Cuyahoga County’s commitment to find new strategies and partnerships that will help expand affordable, high-speed broadband services for Ohio residents. Counties play a critical role in making decisions related to economic development, public safety, and delivering government services that keep communities strong. As evidenced in this [request for information](#), they can also play a significant role in broadband deployment.

Next Century Cities (“NCC”) is a non-profit, non-partisan organization that advocates for fast, affordable, and reliable broadband internet access for communities across the United States. Our membership is made up of over 200 municipalities nationwide. Ten of our member municipalities are in Ohio, including one member in Cuyahoga County. Collectively, our work supports local efforts to expand broadband to every resident in every community, creating opportunities for meaningful participation in a digital society.

Widespread broadband access is a vital component of Cuyahoga County’s infrastructure. It has the potential to improve its tax base, increase jobs, and improve public services while reducing administrative costs. During the Coronavirus pandemic, in particular, residents discovered that working safely from home, complying with remote learning mandates, signing-up for healthcare services, banking, etc. all required reliable internet access.

Many parts of Cuyahoga County have broadband infrastructure. However, broadband adoption still needs to be improved for 19% of residents that do not broadband subscriptions of any kind. By collaborating with other local and state entities, prioritizing digital inclusion, and tailoring the upcoming request for proposals to meet evolving needs of residents, Cuyahoga County could effectively provide digital opportunities for its most disconnected populations.

## **I. The Coronavirus Pandemic Is Challenging What Adequate Connectivity Means.**

According to the Cuyahoga Connected Report, “In Cuyahoga County, physical access to internet services is not an obstacle to connectivity. Each Cuyahoga County community showing a significant nonconnection rate boasts reasonably fast broadband service (i.e. at least 10 Mbps download speed) from at least one provider. Furthermore, broadband service in these areas is nothing new; internet services have been physically present and available to every Cuyahoga County household for a number of years.”<sup>1</sup> Where digital infrastructure is no longer the challenge, as highlighted in Cuyahoga County’s request for information, approximately one in five households do not have broadband subscriptions, many of which are also living in poverty.<sup>2</sup>

The Coronavirus (“COVID-19”) highlighted the strains on demand in served areas. Like others across the country, Cuyahoga County residents are finding that the increased reliance on internet required for work, school, and healthcare has put a strain on existing connections.<sup>3</sup> These problems are likely to persist as telework will continue even after social distancing restrictions are lifted.<sup>4</sup>

According to the Federal Communications Commission (“FCC”), 99.5% of Cuyahoga County residents are served with three providers offering minimum broadband speeds of 25 Megabits per second (Mbps) down and 3 Mbps up.<sup>5</sup> While that may have been sufficient pre-COVID-19, local officials across the country continue to receive feedback from residents that those speeds are not enough to meet the demands of multiple people in a household using the same connection. For faster speed tiers, fewer residents have access to a competitive number of providers. Only 26.4% have access to three providers offering speeds of 100/10 Mbps, while approximately 49% can choose from two.<sup>6</sup> Further, 24.1%

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<sup>1</sup> Samantha Schartman-Cyck, Karen Mossberger, Bill Callahan, Shawn Novak, Amy Sheon, Angela Siefer, Erica Mancinas, and Seong K. Cho, *Connecting Cuyahoga* (June 4, 2019), [http://executive.cuyahogacounty.us/pdf\\_executive/en-US/ConnectingCuyahogaReport.pdf](http://executive.cuyahogacounty.us/pdf_executive/en-US/ConnectingCuyahogaReport.pdf) (Connecting Cuyahoga).

<sup>2</sup> Cuyahoga County Request for Information (Nov. 30, 2020), [https://cuyahogacounty.us/docs/default-source/innovation-performance/digitalinclusionrfi.pdf?sfvrsn=23ec9f39\\_4](https://cuyahogacounty.us/docs/default-source/innovation-performance/digitalinclusionrfi.pdf?sfvrsn=23ec9f39_4).

<sup>3</sup> See Cecilia Kang, Davey Alba, and Adam Satariano, *Surging Traffic Is Slowing Down Our Internet* (March 26, 2020), <https://www.nytimes.com/2020/03/26/business/coronavirus-internet-traffic-speed.html>.

<sup>4</sup> See Katherine Guyot and Isabel V. Sawhill, *Telecommuting Will Likely Continue Long After the Pandemic* (April 6, 2020), <https://www.brookings.edu/blog/up-front/2020/04/06/telecommuting-will-likely-continue-long-after-the-pandemic/>.

<sup>5</sup> See Federal Communications Commission, *Fixed Broadband Deployment, Cuyahoga County*, [https://broadbandmap.fcc.gov/#/area-summary?version=dec2019&type=county&geoid=39035&tech=acfosw&speed=25\\_3&vlat=41.42081930240761&vlon=-81.65134380603376&vzoom=9.376193505132488](https://broadbandmap.fcc.gov/#/area-summary?version=dec2019&type=county&geoid=39035&tech=acfosw&speed=25_3&vlat=41.42081930240761&vlon=-81.65134380603376&vzoom=9.376193505132488) (last visited January 12, 2021).

<sup>6</sup> *Id.*

of Cuyahoga County residents do not have access to more than one service option at 100/10 Mbps.<sup>7</sup>

Competition among broadband providers produces a wealth of benefits including lower prices, higher service quality, and increased resiliency. Some municipalities that seek to improve competition have created open access fiber networks for private entities to lease access and provide last mile service to residents. For instance, Medina County has experienced success with this model. Its Medina County Fiber Network has become an essential component of economic development in the community.<sup>8</sup>

Fiber broadband services are well-known to boast the highest speeds, lowest latency, and best upgrade potential of any technology currently available.<sup>9</sup> While deployment costs can be high in sparsely populated areas, there are ways to offset those costs. Dig once policies, for example, encourage public works projects to include placing fiber or conduit into the ground. It helps lower deployment costs and reduce barriers to entry for new competitors. Thoughtful policies coupled with effective mapping and oversight of conduit in existing construction projects can create lasting community network assets that improve choice and connectivity for residents.<sup>10</sup>

## **II. Establishing Partnerships That Create Broadband Opportunities**

Interagency collaboration at the local and state levels can help to promote broadband expansion while increasing efficiencies in existing programs. Some municipalities do not have the capacity to participate in this type of proceeding. Regardless of whether or not municipal officials in Cuyahoga County respond to the request for information, future outreach to state and local stakeholders can expand the wealth of information and open new doors for collaboration.

### **A. Partner With the Newly Established State Broadband Office**

In March 2020, Governor Mark DeWine established BroadbandOhio, an office focused on expanding high-speed internet access to all Ohio residents.<sup>11</sup> Gaps in communication between local and state governments are sometimes unavoidable, but improving

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<sup>7</sup> *Id.*

<sup>8</sup> Medina County Fiber Network, *What People Are Saying*, <https://www.medinacountyfibernet.com/what-people-are-saying/> (last visited Jan. 12, 2021).

<sup>9</sup> See Bennett Cyphers, *The Case for Fiber to the Home Today* (Oct. 16, 2019), <https://www.eff.org/wp/case-fiber-home-today-why-fiber-superior-medium-21st-century-broadband>.

<sup>10</sup> See North Carolina Department of Information Technology, <https://www.ncbroadband.gov/technical-assistance/playbook/policy-broadband/dig-once-policies> (last visited Jan. 12, 2021) (includes useful resources for dig once policy implementation).

<sup>11</sup> Press release, Governor DeWine Creates Broadband Office (March 5, 2020), <https://governor.ohio.gov/wps/portal/gov/governor/media/news-and-media/creation-of-broadbandohio>.

connectivity for Cuyahoga residents, which could ultimately benefit the entire state, depends on effective collaboration between state and local stakeholders.<sup>12</sup>

It is worth noting that even if a state broadband office is available, it may not have relationships with local governments, which are uniquely positioned to share innovative ideas to improve state policymaking. This is particularly true in the case of newly formed broadband offices like BroadbandOhio. It may not yet have the resources conduct outreach strategies to local stakeholders. Forming a collaboration between Cuyahoga County and BroadbandOhio early in the broadband office's existence could set the stage for a long-lasting and impactful local/state relationship. Contact information for the Ohio state broadband office is publicly available.<sup>13</sup>

### **B. Expand Collaborations Within Cuyahoga County**

Seeking anchor institution partnerships can help improve efficiencies and create a more comprehensive community strategy.<sup>14</sup> Partnerships among anchor institutions, especially schools and libraries, can enhance broadband services offered to the public and provide an infrastructure backbone from which retail broadband providers can expand. Schools and libraries are a primary resource for residents struggling with reliable connectivity – low-income residents, seniors, and those with disabilities among them. In addition to sharing key insights connectivity gaps exposed by the COVID-19 pandemic, teachers and librarians are important thought partners to develop community-wide strategies to increase adoption.

Within Cuyahoga County, namely Fairfax, there are efforts underway to expand lower-priced broadband services to residents.<sup>15</sup> The Cleveland Clinic and DigitalC are partnering with two businesses to expand affordable connectivity.<sup>16</sup> This project follows a collaboration between DigitalC, the Cleveland Metropolitan School District, and other community partners to provide residents with internet access for \$18 a month.<sup>17</sup> By

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<sup>12</sup> See Kathryn de Witt, *How States Are Expanding Broadband Access* (Feb. 27, 2020), <https://www.pewtrusts.org/en/research-and-analysis/reports/2020/02/how-states-are-expanding-broadband-access>.

<sup>13</sup> See National Telecommunications Information Administration, *Ohio*, <https://broadbandusa.ntia.doc.gov/coverage-map/ohio> (last visited Jan. 12, 2021).

<sup>14</sup> See e.g. Siegel Family Endowment, *Infrastructure: Building the World We Deserve*, 6-9 (Oct. 2020), <https://infrastructure.siegelendowment.org/wp-content/uploads/2020/10/Infrastructure-Building-the-World-We-Deserve.pdf>.

<sup>15</sup> See Evan MacDonald, *Cleveland Clinic Community Partners Brining Low-Cost Internet to Fairfax Neighborhood* (Dec. 3, 2020), <https://www.cleveland.com/healthfit/2020/12/cleveland-clinic-community-partners-bringing-low-cost-internet-to-fairfax-neighborhood.html>.

<sup>16</sup> *Id.*

<sup>17</sup> See Emily Bamforth, *Connecting Families With Low-Cost Internet During Pandemic Presents Challenge for EmpowerCLE, Community Partners* (Aug. 21, 2020), <https://www.cleveland.com/news/2020/08/connecting-families-with-low-cost-internet-during-pandemic-presents-challenge-for-empowercle-community-partners.html>.

connecting with community members already involved in digital inclusion efforts, Cuyahoga County can better understand residents' needs and gather intel on potential solutions.

### **C. Seek Partnership with Other Municipalities Focused on Improving Broadband**

Several Ohio municipalities have pursued city-owned fiber as one path to improving broadband in their communities. Their local officials have expertise and learnings to share. In each community, local leaders saw that connecting every resident with high-quality internet access could not happen without local initiative, and undertook the challenge of building a municipal network that offers service directly to residents and businesses.

Hudson was one of Ohio's first Gigabit cities, with a municipal fiber network and now serves all homes and businesses along its fiber route for \$68 a month.<sup>18</sup> Fairlawn's municipal network FairlawnGig also serves homes and businesses and is now focusing on increasing quality even more and expanding to interconnect city and state anchor institutions.<sup>19</sup> Local leaders from both of those communities have expanded outreach to leaders from beyond their city and could collaborate with Cuyahoga County on its connectivity initiatives.

Municipal networks are far from the only model that local governments use to expand connectivity in their communities. NCC's Becoming Broadband Ready Toolkit discusses the plethora of models deployed by local governments and features resources and examples from across the country.<sup>20</sup> Membership to Next Century Cities is free and provides opportunities to build relationships with leaders from counties, cities, towns, and villages that have successfully improved connectivity in their communities.

### **III. Cuyahoga County Should Continue to Prioritize Digital Inclusion**

Featuring digital inclusion in connectivity plans is an essential step to ensuring that all residents have the digital tools they need to connect with family and friends, gain and maintain employment, and access the healthcare services. Cuyahoga County's 2019 report was right to centralize digital inclusion, finding that the two biggest gaps in digital equity involved disconnected senior citizens and residents with low incomes.<sup>21</sup> With these considerations in mind, Cuyahoga County should incorporate accessibility strategies and

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<sup>18</sup> See Velocity Broadband, *About Us*, <https://www.hudsonvelocity.com/about-us/> (last visited Jan. 12, 2021).

<sup>19</sup> FairlawnGig, Fact Sheet (May 2019), <https://www.fairlawngig.net/wp-content/uploads/2019/05/fairlawn-gig-fact-sheet-FINAL.pdf>.

<sup>20</sup> Becoming Broadband Ready (updated Feb. 4, 2019), <https://nextcenturycities.org/becoming-broadband-ready/>.

<sup>21</sup> See Connecting Cuyahoga, 7-12.

targeted outreach for people with disabilities. Nationwide, they are among the most disconnected populations, but are oftentimes excluded from broadband expansion strategies and planning.

#### **A. Accessibility Should be Featured into Design**

Additionally, especially considering the number of aging residents among Cuyahoga County’s disconnected population, ensuring that the technologies employed are inclusive of people with speech, hearing, and mobility disabilities is essential.<sup>22</sup> For people with disabilities, broadband connectivity during the COVID-19 pandemic has truly become a matter of life and death, allowing them to work, learn, and maintain access to essential services from the safety of their own homes.<sup>23</sup>

Finally, when selecting specific providers and vendors, Cuyahoga County should, specifically, solicit feedback residents with disabilities to ensure that accessibility has been integrated into digital inclusion plans. It is important to get feedback from residents who could be adversely impacted by the oversight. Innovative and aesthetically pleasing technology can tremendously improve the quality of life for residents. At the same time, implementing new technology without first vetting the design with residents with different disabilities can undermine the goal of ensuring that all residents have access to the digital tools to get and stay connected. When designing public WiFi and introducing Smart City applications, it is important to bring people with disabilities into the conversation to ensure that designs are accessible for all of Cuyahoga County’s residents and visitors.

#### **B. Outreach to Disconnected Residents**

The first stage of developing broadband solutions often involves surveying residents to determine whether and where the option is feasible. Even though there are physical limitations that make conducting surveys offline more difficult due to COVID-19 restrictions, it is imperative that those surveys be made available to residents who do not have the devices, connection, or digital literacy necessary to complete a survey online.

### **IV. Specifications That Could Refine Requests for Proposals**

The requests for proposals (“RFP”) stage is an integral step in establishing partnerships with providers and vendors. Cost tends to be the primary consideration when evaluating proposals. Notably, resiliency and unrestricted data usage are two areas where quality is a more important consideration than cost. While the cost may be lower in the short term, Cuyahoga County’s residents can only benefit if the technology available can stand the test of time and provide meaningful connectivity when it is most crucial.

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<sup>22</sup> See Connecting Cuyahoga, 7-12.

<sup>23</sup> See Abigail Abrams, *'This Is Really Life or Death.' For People With Disabilities, Coronavirus Is Making It Harder Than Ever to Receive Care* (April 4, 2020), <https://time.com/5826098/coronavirus-people-with-disabilities/>.

### **A. Ensure that Infrastructure is Resilient**

This year has highlighted the importance of resilient infrastructure more than any other. When times of disaster hit, communities are devastated whether or not a resiliency plan is in place, but resiliency can help improve recovery times and save lives in times of crisis. Now more than ever, both residents and governments need online tools to share and receive critical information about the pandemic. The request for proposal stage is the ideal stage to incorporate resiliency plans.

### **B. Proposals Should Not Include Data Caps**

Some cities specify in RFPs that vendors not include data caps on wireless or wireline options. As Cuyahoga County's report highlights, data caps not only disadvantage low-income residents, but also run counter to the County's pursuit of long-term goals for residents to obtain and maintain access to reliable service.<sup>24</sup>

High-capacity applications used for telehealth, distance learning, and working from home drain data caps quickly, leaving residents as disconnected as they were when they started.<sup>25</sup> Families with several household members that are the most resource constrained, and people with disabilities who may require a higher amount of capacity to make online services accessible, are among the many people for whom data caps detrimentally impact. While data caps are typically associated with cell phone connections, they may also apply to public WiFi connections. That puts residents who are struggling with connectivity – forced to work outside or in a car during the pandemic – at a further disadvantage.

Data caps on home broadband subscriptions can prevent entire households from having the requisite capacity to stay connected. Accordingly, when drafting the RFP and considering proposals, it is important to ensure that they do not include data caps that restrict service after a certain amount of use.<sup>26</sup>

## **V. Conclusion**

Cuyahoga County is among local governments nationwide that recognize the importance of broadband. Residents who remain disconnected or do not have high quality service need innovative solutions to be able to work, learn, and obtain healthcare from home. As the project moves forward, please continue to use Next Century Cities as a resource. Aside from publicizing RFPs, the local officials within our network could be thought partners in the strategic planning process that ultimately expands digital opportunities for Cuyahoga County residents.

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<sup>24</sup> See Connecting Cuyahoga, 16-17.

<sup>25</sup> See Connecting Cuyahoga, 16-17.

<sup>26</sup> See e.g. City of Condon, Request for Proposals (Nov. 4, 2020), <http://cityofcondon.com/wp-content/uploads/2020/11/RFP-November-2020-with-revisions-1.pdf>.

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