

Sept 15, 2023



Director Liana Bailey-Crimmins
Director, California Department of Technology
707 3rd Street, 2nd Floor North
West Sacramento, CA 95605

RE: Prioritize Equity in Phase 1 of the Middle Mile Broadband Initiative

Dear Director Bailey-Crimmins,

On behalf of #OaklandUndivided—a collective impact initiative uniting elected and civic leadership, community-based organizations, and anchor institutions in the pursuit of digital equity—we are writing to offer our preferred path forward for the Middle Mile Broadband Initiative (“MMBI”) and revision of the State Broadband Map.

This once-in-a-generation state and federal investment is an opportunity to achieve Broadband for ALL and ensure that affordable, high-speed internet access is a reality for everyone. We want to first appreciate the intention set forth by Governor Newsom and the state legislature, and the renewed commitment to divert funds from the January 2024 budget to ensure full funding of all proposed Middle Mile broadband segments.

In order to ensure that this bill achieves the intended purpose of Broadband for ALL, #OaklandUndivided formally requests that the California Department of Technology (“CDT”) take the following actions:

- 1. Prioritize investments in the least connected, lowest-income communities:** As the Governor’s Office has committed to funding the entirety of the initially proposed MMBI, the State must prioritize the communities farthest from opportunity to actualize the purpose of the legislation. The sole purpose of this bill is to use public dollars for public benefit. These communities cannot afford to wait another year while tens of thousands lack access to this twenty-first-century necessity. Middle mile deployment should start with the highest needs communities as determined using these existing metrics: (1) the communities with Socioeconomic Vulnerability Index (“SEVI”) scores in the highest 50%, or (2) segments serving an SB 535 (CalEnviroScreen) Disadvantaged Community. Therefore, all segments in Oakland, including the I-580, must be reinstated to Phase 1.
- 2. Uncouple the upcoming \$4B grant funding (FFA Last Mile & BEAD) from the California Public Utility Commission’s demonstrably inaccurate State Broadband Map until a non-discriminatory map can be developed:** A representative from the California Public Utilities Commission (“CPUC”) confirmed on record to the San Francisco Chronicle that this data is flawed. We know that these maps woefully understate the connectivity issues that we know to be true in our city, and the challenge process is not designed to remediate inaccuracies at this scale. An estimated 94,000 (21.7 percent) Oakland residents lack home digital access. [With 80% of Oakland’s housing stock built before 1980](#), many residents in Oakland lack access to the modern telecommunications infrastructure that enables high-speed internet, a necessity in the 21st century. Furthermore, the [California Public Utilities Commission report](#) concluded that, for decades, internet service providers have persistently divested in historically redlined communities while overinvesting in wealthy communities. These business decisions, informed by short-term profit motives, have created [disparate impacts](#) for communities of color and individuals with disabilities. Using the maps in their current form will only further widen the digital divide. It is critical that the CPUC and CDT work together to greatly revise these maps through a transparent, public process with data and analysis to support their decisions. Until then, the State must uncouple the upcoming \$4B of grant funding from these demonstrably inaccurate maps.

As leases for the middle-mile network could be signed within the next few weeks, an urgent reply is requested. **Please respond to this letter by Friday, September 22, 2023, detailing your plans to prioritize broadband infrastructure in the least connected communities and uncouple funding from these demonstrably inaccurate maps.**

Sincerely,