

2020-2021

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November 20, 2020

California Broadband Council  
1325 J Street, Suite 1600  
Sacramento, CA 95814

Submitted via: [CABroadbandCouncil@state.ca.gov](mailto:CABroadbandCouncil@state.ca.gov)

**RE: California State Broadband Action Plan – COMMENT LETTER**

Dear California Broadband Council,

The League of California Cities (Cal Cities) appreciates the opportunity to provide comments on the California Broadband Council's (Council) State Broadband Action Plan. Additionally, Cal Cities is encouraged by the Council's continued efforts to include local government stakeholders in this important process.

As local governments have mobilized to address the spread of COVID-19, the lack of access to reliable and affordable broadband service has been especially highlighted as unserved and underserved communities have struggled to stay connected to school, work, and healthcare in the new digital environment. While Californians are increasingly using the internet to connect with others, local governments have taken to online platforms to ensure civic engagement during these unprecedented times. Additionally, as noted in the draft plan, our communities depend on reliable broadband service to ensure the quick delivery of public safety information.

In an effort to support closing the digital divide, Cal Cities endorsed the California Economic Summit's broadband [platform paper](#), which underscores key principles to be considered in the development of a statewide broadband policy. Along with the principles detailed in the platform paper, our key comments on the Broadband Action Plan are as follows:

**Access:** Issues related to broadband access are not limited to specific geographic areas but are a statewide issue impacting inner cities and rural communities alike. Cal Cities believes high-speed internet access is essential infrastructure, which should be accessible to all Californians at speeds that support the myriad of activities essential to local governments and their residents. Additionally, as California faces what has become a year-round fire season, it is critical that broadband access is reliable and not prone to utility-initiated power shutoff events.

In determining access, Cal Cities encourages the Council to prioritize state data, rather than industry data, which can present non-substantiated claims that an entire area is served. When discussing funding for broadband deployment, local governments must be on an equal footing. This will support innovative solutions to broadband deployment, specifically through municipal broadband public-private partnerships. Currently, local governments are only eligible for California Advanced Services Fund (CASF) infrastructure



grants if no other entities apply. Cal Cities believes that municipal broadband deserves to have equal standing and eligibility for state funding.

**Adoption:** The success of broadband deployment statewide hinges on affordable internet services. Income is the greatest barrier to adoption, and while many providers offer low-cost options, more must be done to decrease costs, increase speeds, and integrate devices. Cal Cities believes that broadband adoption must be a parallel priority to broadband built out, which is key to achieving racial, social, and economic equity in California.

**High-Capacity Future-Proof Infrastructure:** It is clear that existing broadband threshold speeds are insufficient and do not provide the bandwidth necessary to stay connected during the pandemic. Cal Cities believes that state funding should focus on high-capacity, future-proof infrastructure that ensures 21<sup>st</sup>-century ready communications. Financing antiquated networks that will need to be replaced in just a few years will only exacerbate the existing digital divide issues in California.

**Unintended Consequences for Local Governments:** While Cal Cities recognizes the need to accelerate broadband deployment, we are concerned about policy recommendations that point to permit shot clocks as a tool to address deployment issues. According to a Cal Cities fiscal analysis, cities statewide face a nearly \$7 billion revenue shortfall over the next two years due to COVID-19. The substantial economic impacts of COVID-19 have forced cities to cut critical local services, including police, fire, public works, planning, and permitting. Adding additional mandates, such as permitting shot clocks to cities, especially now, would only further impact their fiscal and staffing challenges over the next two fiscal years and will require cities to divert resources from essential city services. Additionally, for cities with finite resources, prioritizing certain permit types with very short turnarounds will result in fewer resources to complete other types of permits, including projects related to affordable housing, health and safety, and other established or emerging industries.

Cal Cities is particularly concerned about the provision included on page 11 of the draft plan that recommends state-funded deployments “should be prioritized in local jurisdictions...where the government has streamlined the process for permitting and obtaining land use approvals.” Without further clarification as to what this streamlined process entails, Cal Cities would urge the removal of this section from the draft plan for the very reasons noted above.

Cal Cities values the opportunity to provide feedback in this extensive stakeholder process. We stand ready to work with the California Broadband Council to further the state’s broadband goals while implementing them in a way that will work for local governments. If you have any questions regarding these comments, do not hesitate to contact me at (916) 658-8218.

Sincerely,

A handwritten signature in blue ink that reads "Derek Dolfie".

Derek Dolfie  
Legislative Representative