



Office of the Executive Director for the Pennsylvania Broadband Development Authority  
Pennsylvania Department of Community and Economic Development  
Commonwealth Keystone Building  
400 North Street, 4<sup>th</sup> Floor  
Harrisburg, PA 17120

September 26, 2022

**Re: Letter of Support and Recommendations for Broadband Equity in Pennsylvania**

Dear Mr. Carson,

It is clear that equitable and affordable broadband access has become a critical form of community infrastructure, as necessary as electric service, public transit, and sound roads and bridges. Yet, thousands of households still do not have this basic necessity.

We write on behalf of The Task Force on Broadband Access and Equity, comprised of University of Pittsburgh departments (Pitt Information Technology, Pitt Cyber, Pitt Institute of Politics, and the Office of Engagement and Community Affairs), Carnegie Mellon University (Metro 21), City of Pittsburgh, Meta Mesh Wireless Communities, Penn State, KINBER, and the Pittsburgh Technology Council.

The task force was formed out of an understanding of the digital equity needs in our local communities, but also in the Commonwealth as a whole. Each organization represented in this task force has an interest in serving their communities and assisting the Broadband Development Authority in the tremendous task of ensuring that Pennsylvanians have access to affordable, reliable, high-speed internet. With over 30,000 students on Pitt's main campus in Pittsburgh, as well as branch campuses in Bradford, Greensburg, Johnstown, and Titusville, Pitt understands community needs in the urban core, as well as in rural parts of the Commonwealth. Task force members understand the unique needs of Western and Central Pennsylvania, and also have deep knowledge related to digital equity and inclusion and the technical nature of broadband infrastructure.

Our task force is concerned with ensuring our communities have the opportunities to not only succeed but to thrive. Broadband has, in large measure, become an enabler for economic development in the United States.

Having investments in broadband infrastructure makes a region attractive to businesses looking to expand and/or relocate. Additionally, having strong public infrastructure and services (R1 universities, transportation, affordable housing), with broadband as a cornerstone, can make our region attractive to start-up activity. Internet connectivity can make access to good and affordable healthcare a reality for members of unserved/underserved communities. It can create opportunities for continuing education and employment, leveling the digital playing field and becoming an economic accelerator for the Commonwealth and beyond.

We understand these are not new or novel concepts to you or your team members. We write this letter in hopes that you will see the members of this group as resources for your efforts to close the digital divide.

We understand that the Broadband Development Authority is hard at work developing Pennsylvania's 5-Year Plan that will likely encompass many of this group's concerns and priorities. Please consider the attached recommendations as possible additions/clarifications to current drafts. We look forward to discussing further and hope you will not hesitate to reach out if we can be of assistance.

Sincerely,



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**David Brown**, Vice Chancellor for Government Relations and Advocacy



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**Lina Dostilio**, Vice Chancellor of Engagement and Community Affairs



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**Mark Henderson**, Vice Chancellor and Chief Information Office, University of Pittsburgh

## Task Force on Broadband Access and Equity Recommendations

We understand that the Pennsylvania Broadband Development Authority is working on a draft of the BEAD 5-Year Plan that will likely encompass many of this group's concerns. Please consider the following nine recommendations as additions/clarifications to the current draft.

**1. Perform a comprehensive review of new FCC data maps and create a PA map of actual broadband availability and speeds.**

Prioritize servicing unserved/underserved areas with an emphasis on rural counties that lack adequate access and speed. It is well-known that current FCC maps are not accurate or reliable. Pennsylvania should review all data to ensure it is as accurate as possible and perform its own analysis of precisely where advertised services are actually available as well as actual broadband speeds. Research from the Center for Rural PA indicates that there is likely a substantial [overstatement](#) of broadband availability in rural communities. Similarly, prior research indicates internet service providers self-reported service tiers are drastically overstated.

**2. Prioritize 100/20 Mbps as the minimal buildout speeds for all future state grant-supported programs.**

The Center for Rural PA [found that](#) no Pennsylvania county had more than 50 percent of tested users fully served by broadband.

**3. Prioritize community partnerships to drive Affordable Connectivity Program adoption.**

Partner with municipal library systems, community action agency networks, school districts, and faith-based organizations to ensure anyone eligible for the Affordable Connectivity Program (ACP) is signed up. Awareness of affordable internet access gives community members the option to engage in employment opportunities and/or develop requisite skills to become employed, to improve mental health and wellness, and access to additional resources around education and telemedicine.

**4. Allocate funds specifically for digital literacy and digital navigator programs.**

Allocate funds to community anchor organizations to ensure community members have the digital literacy skills needed to utilize their broadband access effectively. [Research shows](#) that digital navigators are particularly successful in teaching digital skills and increasing internet adoption.

**5. Create a formal communications group.**

A formal communications group should develop communications processes that keep key stakeholders, city and county officials, and PA residents apprised of activities and developments in the broadband arena. Activities such as program availability (like events to drive ACP adoption), funding opportunities, timelines, etc. should be thoroughly communicated in multiple ways that meet community members where they are in order to build/maintain trust in these communities.

**6. Repeal [66 Pa. Cons. Stat. Ann. § 3014\(h\)](#)**

Repeal the Pennsylvania state law that prohibits municipalities from providing broadband service to residents for a fee, unless no such services are provided by private telecom companies and no private telecom companies are willing to provide such services within 14 months of being requested to do so. The law further stipulates that data speed should be the only consideration in determining whether private industry is servicing residents – excluding things like pricing, coverage areas, and quality of service. We also suggest a comprehensive legislative review to ensure there are no other laws barring various business models from existing.

7. Assign members of the Broadband Authority and/or DCED to work directly with counties and cities to inform leaders and residents, learn from community members, and provide sustainability assistance.

Broadband Authority team members should work to identify resident and economic development needs, educate officials on options related to broadband access, and ensure that there is a comprehensive plan to ensure affordable, high-speed broadband is available to all residents in their community by 2028.

Feedback should be solicited from county officials to ensure the Broadband Development Authority has a complete understanding of broadband needs across the Commonwealth. Since participants applying for funding may not participate in any Broadband Authority subcommittee, it is important that the Broadband Authority provide proactive leadership and insights directly to counties and municipalities (also done via Recommendation #5) to ensure local leaders are educated on the specifics of broadband infrastructure and how it impacts their community. Close continued consultation with a breadth of local community leaders can inform the Broadband Authority on the unique context and experiences facing their communities. This task force can be a neutral forum for discussion – bringing residents and community leaders to the table, as well as providing physical spaces to host awareness campaigns and informational sessions.

Similarly, we encourage collaboration across state agencies with a focus on sustainability (ex: utilizing PennDOT fiber assets and PA Turnpike Commission's [Fiber Optic Network Project](#)). It is vital that the Broadband Authority take into consideration the long-term cost burden on communities and be mindful of the need to update infrastructure long-term. The Southwestern Pennsylvania Commission's [Connectivity Roadmap](#) illustrates ways to focus on sustainability and futureproofing.

8. Create a map of Pennsylvania with the funding programs for each segment indicated.

With multiple funding programs such as the NTIA Middle Mile Program, NTIA BEAD Program, and US Treasury Capital Program, among others, available to fund new broadband infrastructure, it will be exceedingly important that the Broadband Authority, in partnership with counties and municipalities across the Commonwealth, is able to cross-check which funding program will apply to each section of Broadband infrastructure.

Each of the funding programs has limitations on how it can be used, and counties may find that they have significant gaps where none of the programs are able to be applied in certain areas. These limits or gaps in funding for an integrated broadband infrastructure should be readily identified so that steps can be taken within the state, regionally or locally to find funding to close those gaps. The Southwestern Pennsylvania Commission's [Connectivity Roadmap](#) provides insight into funding opportunities and may be a good resource.

**Act 96:** The Broadband Authority shall develop a statewide broadband plan in collaboration with local and regional entities to advance broadband buildout.

9. Create a final proposal plan that explicitly supports the use of NTIA BEAD funding for serving un and underserved urban areas.

Focus on areas of high poverty and institutions that serve underserved urban communities so that urban areas of PA can be eligible for funding under the exemption that this use is “determined necessary by the Assistant Secretary to facilitate the goals of the program.”