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Regarding the Broadband Study (WUTC Docket 070986)

Input from the Communities Connect Network (CCN)
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The Communities Connect Network (CCN)[1] has a strong interest in the deployment and use of broadband in Washington State. We appreciate the opportunity to comment and we commend the Legislature and WUTC for supporting this effort to "conduct a survey to identify factors preventing the widespread availability and use of broadband technologies."[2] An adequate statewide assessment is a critical step to ensuring we have the policy, programs and partnerships necessary for our state to lead the way in forging a healthy and inclusive 21st century economy.

Below are our recommendations for the study:

1. **Adopt a Definition of Digital Inclusion**

   We encourage the WUTC to adopt the delineation of Digital Inclusion that we have included below as a starting point to identify the factors to be considered for broadband adoption. We want to emphasize that looking only at availability is not enough. Understanding the cost, skills and perception barriers are essential for broadband adoption and the success of online government, education, work and health services.

   Digital Inclusion seeks equity for residents, as well as small businesses and community-based (non-profit) organizations. Digital Inclusion encompasses three areas:

[1] CCN (http://www.communitiesconnect.org/) is a consortium of public- and private-sector organizations committed to seeing that Washington is a leading technology state that ensures "digital inclusion" – where every resident has sufficient access to information technologies and the Internet, the digital literacy skills, and the knowledge to both find and create meaningful online content and services – regardless of where they live, their income, race, gender or age. Our network includes experts in providing technology education to underserved residents, technology assistance providers and others with economic development, policy, funding, and research expertise.

[2] 2007 SHB 1128, Section 149, Paragraph 3

i. **Access**: Availability, cost, ease of use for connectivity to the Internet, and end-user hardware and software;
ii. **Technology Literacy**: Skills required in order to utilize the equipment and Internet effectively for essential services, education, employment, civic engagement and cultural participation; and
iii. **Relevant Online Content and Services**: Services available for those in need, culturally and educationally appropriate design, marketing and placement appropriate to reach underserved communities, and enabling of content production and distribution by lower capacity residents, businesses and organizations.

2. Define Appropriate Metrics

The WUTC is faced with a significant challenge to provide a study which is larger in need and scope than the resources provided. A comprehensive examination of broadband in our state would include metrics on the distribution network, services (broadband content or applications), and customers.

We believe the WUTC should identify the full set of metrics that would answer the legislation's intent and long-term data needs, understanding that not all of these metrics may be collected at this date. Plan for follow-up studies. Identifying the metrics now is critical to setting benchmarks and acknowledging priority choices made for the current study. Longitudinal data measuring trends in availability and usage will be more valuable to policy makers and service providers than one-time "snap-shot" data. CCN recommends the WUTC design this survey to establish (or significantly contribute to the establishment of) baseline metrics and data for an ongoing, statewide monitoring effort of broadband availability and usage. The City of Seattle Information Technology Indicators for a Healthy Community provides a valuable example.[3]

[3] http://www.seattle.gov/tech/indicators. See list of measures at (www.seattle.gov/tech/indicators/prelimreport.htm), , small business report (www.cityofseattle.net/tech/indicators/smallbiz/smallbiz.pdf), and npo report (www.cityofseattle.net/tech/indicators/nporesults.htm)

3. Design Appropriate Methodology

Use a methodology that understands all Washingtonians are potential broadband users and that there are different types of customers. The study methodology should ensure inclusion of populations that Internet research data has historically shown to be technology underserved or to have lower levels of adoption.[4] This could be accomplished through some over sampling in survey areas and through targeted focus groups. It should be noted that multi-family dwelling units, especially those providing low-income housing, face a somewhat different challenge obtaining broadband than single residential units.

In addition to residential users, the state certainly has an interest in broadband adoption by small businesses and non-profit organizations (including human services, health, arts and community development agencies as well as immigrant/refugee associations). The study design should examine barriers and opportunities for these two customer segments. Focus groups and/or surveys distributed through state and local governments or service provider networks may be the best way to reach these groups.

4. Adopt Appropriate Data Collection Goals

Since the WUTC has limited resources to perform this study, focus on representative sample areas, models and focus groups.

Adopt a data collection goal of providing customers and policymakers with a single understandable source for provider information. For any given area and address in the state, comparative data should be available indicating what providers are available, what service levels are available and at what cost. We know from our constituents that broadband in a zip code does not necessarily indicate universal service availability. Detailed distribution reporting, managed by a third party, combined with reporting from local governments, consumer sampling and a consumer reporting tool (such as a web survey and phone line) could provide and check this data.

[4] See Pew Center for Internet and American Life data as well as City of Seattle IT Indicators (www.seattle.gov/tech/indicators). See also the work by Robert Fairlie on Race and Digital Divide.

Gather baseline speed data with the proviso that it does not define the state's broadband speed goals. Since this study is providing a baseline on availability, we recommend data collection of wired and wireless service levels using a relatively low threshold. The FCC broadband criteria is low, but would suffice with a clear statement that this does not imply a definition or goal for broadband for the state of Washington.

Since most consumers and policymakers have limited understanding of the term broadband, terms need to be translated into plain language for data gathering and reporting (e.g. "who is your provider and do you know if you have cable or DSL Internet service?").

Based on our experience with research and analysis, CCN recommends the WUTC request a time extension of 6 months to do the job right and to produce a quality study.

5. **Utilize Available Expertise and Technical Assistance**

   Use an expert third party to collect data along with technical advisors. CCN recommends the WUTC contract with one or more reputable, trusted, and qualified research organizations to design and implement the survey methodology.

   The contractor(s) should have experience measuring digital divide issues and work with technology underserved communities. It would be valuable for the WUTC to empower a small team with research experience in these areas as technical advisors. CCN could provide references to digital inclusion and research experts and would be interested in working with the WUTC on this.

6. **Map opportunities for public access to technology and training**

   As the state considers models and opportunities for facilitating adoption of broadband, this should include mapping of community technology resources where residents without the access or skills can go for assistance. The state has data on public libraries and CCN has additional limited data available on libraries and community technology learning sites.