WNY Digital Equity Coalition

Consolidated Public Comments on the
Draft New York State Digital Equity Plan

Public Comment Sessions:
- Nov. 29, 2023: Amherst, NY (Three [3] Attendees)
- Nov. 30, 2023: Olean, NY (Four [4] Attendees)
- Dec. 4, 2023: Virtual (Twelve [12] Attendees)

The following comments collected from attendees at the three Public Comment Sessions held by the WNY Digital Equity Coalition were submitted to the New York State ConnectALL Office on December 6, 2023 via the online public comment submission form. Five submissions were required to capture the volume of comments from these sessions (submissions were limited to 5,000 characters).

Chapter Two (Unified Vision)

- One-time funding doesn't sustain programs. The Governor, Senate, and Assembly need to understand that funding for the organizations and groups that are doing this work needs to become a critical and consistent part of the New York State budget. These organizations do more with less every year, but at a certain point it's not sustainable. These organizations are asked every year to do more with less funding and support to sustain them.
- ConnectALL needs to understand and acknowledge that digital literacy education occurs outside of the schools and outside of school funding. There are other community organizations [providing education services]. This needs to be reflected in the language throughout the plan (e.g., replace "educator" with "trainer").

Chapter Three (State of Digital Equity in New York)

Asset Inventory
- Please provide guidance on how/when additional resources can be added to the digital equity asset inventory.

WNY Regional Snapshot
- Indicate breakdown of survey responses by online or hard-copy. If survey is mostly online, numbers will be heavily skewed.
- How was the survey data and the information collected? If it was collected over the internet, and they don't have access to internet, then is the data correct?
- Digital literacy – confidence levels in different activities seem high. Possibly an artifact of online surveys?
- Fiber is future proof. Fixed wireless is more expensive and time-consuming to upgrade. We want to see the money spent right and do it right the first time and one time.

- Even if people are using cellular data plans as their primary access (27% in Western NY), rural areas still have many dead zones. Having a data plan isn't the same as having consistent and reliable internet.
- The cheaper cell phone plans are the ones with worse coverage, but these are often the only ones that are affordable.
- Many of the places in which you can't get wired-based internet service, you also don't get good cell phone connectivity.
- Curious about what the "other devices" are that people using to access the internet.
- Surprised at number of people expressing confidence with online banking, health and medical information. Many people come in to libraries who don't know how to do these things.
- Survey data are limited because people don't know what they don't know.
- Concerned that the lowest confidence level listed for digital literacy is protecting privacy.
- Concerned that lowest percentage on public resources graph is applying for internet subsidies.
- Data are definitely telling us that people need a lot of help when it comes to getting access to those internet subsidies.
- Digital Literacy and Public Resources graphs don't show scale clearly. Visuals can be misleading because bars that span the graph aren't at 100%. Need to make scale clearer.
- REDC maps might be useful for the planning purposes, but other maps regional maps could be more helpful with implementation. Consider looking at library and tourism maps, as they're "closer to the ground" than REDC maps.
- Clarify when data use individuals as the unit of analysis and when households are the unit of analysis.
- Surprised that digital literacy survey did not include work-from-home/remote work skills.

Chapter Five: Implementation

Broadband Accessibility and Affordability

Needs
- Disparities in broadband coverage in rural areas are disproportionately worse than indicated in the overall regional snapshot. Lack of access to high-speed broadband is not evenly distributed across these five counties.
- It was odd that the median household bundle under the monthly service costs $90 a month while the unbundled costs $75. I would have expected it to be reversed because usually when you bundle you get a lower price. So, does that mean the people that bundle always just have more money so they buy a higher plan and that's the upsell part of it?
- [Unbundled plans are] "only" $75. "Only?" Well, $75 is a lot for some households.
- The $75 price point for unbundled broadband is not affordable for many people living in rural communities.

- How solid are the internet service cost figures? Many people answering the survey probably guessed or estimated what their internet service cost is.
- Surprised that 48% of the households are enrolled in ACP. Seems high.
- What happens when funding for ACP runs out? How many people are just going to turn off their internet and not get it back again after even a very short time without it?
- The Universal Service Fund and the ACP need to be bundled together. Maybe the benefit can be set up in tiers. Maybe prorate the benefit depending on income. This could spread that money out a little bit more.
- After decades working on digital inclusion, we know that availability is only half of the problem. Affordability is the other half or maybe more. If we build it but people can't afford it, what good is it?
- Broadband is not a luxury anymore; it's a needed utility like electricity and heat and water and phone. People that need the services the most and need the access are not getting services and applying for them because it's too difficult.
- ACP enrollment is difficult; there are barriers to entry besides not having the ability to go into online and fill out the forms. Not every elderly person has a daughter or a child or a family member that can help advocate and navigate, so those barriers to entry are huge.
- Surprised about the number of 20% of low-income households and 14% of rural households lack broadband internet. Locally, that seems low.
- Why are only 48% of [ACP] eligible households enrolled? Is it that they don't have that access [because they don't have high speed broadband] or they're not eligible because they don't have that access?

Measurable Objectives
- Are there targets? Are these objectives associated with actual targets or targets at a certain point in time in the future as opposed to just we want to improve these objectives?
- The objective indicates that the focus is on increasing the number of households with broadband access, but it really it's low income and rural households that need the access. There's no objective specifically around increasing rural or low households. The objective could be reached by increasing the total number of households without touching low income and rural people if it's not specified.
- It seems like affordable is like one word and that and I think it's 50% of the problem. So that'd be the only thing. I don't know if there's enough focus on that and maybe it's just because it only takes one word to describe it.
- The measurable objectives focus more on availability than affordability. Affordability is half or more of the problem.

Activities
- The State should incentivize building of cell towers and mandate that service providers can't increase prices, because they're not funding the infrastructure build-out. Infrastructure build-out is the best use of one-time funding, since programs that are

funded through this will come back for more money in the future, but there's no money there. Building physical infrastructure that actually provides the service is a good one-time investment. There would need to be something that prevents the service providers from increasing prices on the backs of a public infrastructure investment.

- Getting more ISPs into an area is a laudable goal, but will they be building out new infrastructure or leasing existing? If it's leasing existing infrastructure, is that really competition? Are we bringing in a new top-tier provider, or are we going to have another dozen poor-quality providers?
- Universal availability needs to come before competition. Everyone needs to have access before we can start trying to pit ISPs against one another.
- ACP enrollment needs to be as simple as checking a box on your tax return and automatically qualifying if you meet income requirements. The current application process is very long and cumbersome.
- It would be useful to look at the history of how electricity became regarded as an essential utility. A similar process could be used to ensure universal broadband access.
- The process to do that is to reach these people and tell them about these programs is the internet. I guess you run ads on local public channels or something. Or on free TV network or 24/7. Or mailers to homes or billboards.
- Remove intimidation barriers that people may have. Like, well, I don't want a computer. Some of these people are going to be reluctant. So how do you reach them? I don't know if you can.
- But certainly the people that are having these problems due to financial difficulties in their homes. Yeah, you got to find a way to do it. Maybe through the schools or other means. Sure. Yeah, and you were talking about the accessible, availability, and affordability pieces.
- It's something that we'll grow out of, unfortunately. Older people as they pass away, unfortunately. They're the digital lack of digital abilities and stuff like that. And that's going to go over time. In the meantime, obviously you want to reach those populations that you can and help them somewhat. But that problem will eventually solve itself.
- I think the Universal Service Fund model is the right approach in my opinion. I think it's a universal approach that worked so well for telephone service for a hundred years or wherever it's had, would be the right approach would work again to do that. It's proven and it's equitable fair and equitable. So if we can do something like that to do that, like I say, back again to affordability being half the problem there.
- Unless you live in one of the main towns in [rural county], you don't have accessibility to internet services. And some of the areas, they have cable home internet. They apply for the affordable connectivity program, but because they don't have Fios or high speed internet, they can't get it applied to their account, even though they qualify in all the other areas. So just something else to be aware of.
- There are no activities connected to increasing the number of ISPs within a region. What activities are going to promote that competition?
- Outreach efforts need to include activities to ensure that the public knows that libraries are a place to get internet access and assistance.

- ACP cannot be applied to satellite internet or copper line, like phone internet. It only can be applied to high speed cable internet or FiOS. We have a lot of people locally with satellite internet that went through the entire process and then they find out at the very end after all that work that they weren't qualified for ACP because of their connection type.

Equipment and Device Support

Needs

- I would imagine low-income households are less likely to have a variety of things just because they have less money. Some of it's a bigger problem than just digital stuff.
- If libraries were funded well and a trainer certification were available (for computer maintenance and troubleshooting), the state could create an army of trained people in key places, then you think about the people who come in and get trained, then they could become trainers. The economic growth connected to this increased knowledge of just doing things on the internet and providing technical support could be significant.
- There should be an emphasis on distributing refurbished devices, because that's where you're going to get some of the lower income folks. They can't go buy a new computer but they could afford one that's been refurbished.
- Needs relating to people with disabilities need to be clearer: individuals living with disabilities are deterred by not having assistive technology and therefore less 8% more likely to live in homes without laptops. Otherwise, it's odd to single out a specific group that has a low number of laptops in their home.
- Many people with disabilities that don't have internet access are living in congregate settings. One barrier in those environments is agency policies about keeping personal computing devices. This might need to be addressed as well.

Activities

- Larger electronic devices could have a modest deposit where you pay up front, but if you recycle it you get the deposit back. That could encourage recycling and make more devices available to be refurbished and given to low income households. Many people buy a new laptop or computer every year or every other year, so there are lots of usable devices that could be refurbished.
- You could have like a library staff person that is your tech support person for a community. Or staff could travel to senior centers and other community settings monthly so people can bring in their devices in get help.
- Devices can't be distributed and refurbished unless they're collected first. The activity needs to include that collection piece, which raises other questions about activities.
- Safe disposal and recycling really has two aspects to it: toxicity/environmental concern and ensuring that a person's/household's digital footprint is no longer on that machine.
- One of the challenges with assistive technology is the inaccessibility of the software itself. Partnerships with device manufacturers could also be extended to software developers to promote accessibility and accessible design.

Digital Literacy

Needs

- Percentages of people struggling to use the internet within the covered populations seem low.
- Digital skills classes and technology programs must be available to people who are incarcerated or newly re-entering the community. These skills are necessary to survive outside of prisons, especially if we expect them to get and keep good jobs.
- Digital literacy really seems to be focused on technical skills, but omits information and media literacy, which is equally important.
- For people with developmental disabilities, lack of information and media literacy is one of the biggest barriers to access since they can't navigate safely.
- Lack of consistent curricula and standards is definitely a major problem. A program/curriculum/standard that all community-based digital literacy programs could get behind would be a game changer.
- It would be great if there was a certification for digital skills. You just go online and do certain tasks, and you get a certificate that you can take to an employer who could then be confident that you have certain skills.
- Look to partners and neighbor states (e.g., New Jersey) that are passing information and media literacy standards (e.g., CSDF - Computer Science and Digital Fluency - standards). Public libraries, school libraries, and school library systems play a role in helping to address those needs so that the younger generations as they're preparing to transition into college or work.

Activities

- Prioritize search skills along with information/media literacy over fact memorization/retention in schools. Teach students to get good information and how to filter out disinformation. Let them use it in the class and incorporate it into your lessons.
- I was almost wondering if we could do something like when you go to the DMV and you drive a license, they ask you, you want to be a donor. An organ donor or something like that. So it's a program they have to ask you. It's like part of their job if you're getting a license or whatever. I almost wonder is if those seven different programs like food stamps and heat and all those things is if they have to ask their clients, do you know about the ACP? Do you need internet subsidy? Do you need digital skills? And even if they say yes, they just check a box someplace and that information goes to somebody who can reach them out and do that. I guess it could be two steps. Can you do it yourself? And if not, we can have somebody reach you maybe. Or something like that.
- Be sure activities include educating adults of children with technology and offering that support. Parents need to know how to help their own children with cybersecurity, with digital fluency, with settings and how to lock down their devices. This is also true for information and media literacy as well.
- "Educators" needs to mean people who are providing training, not specifically K-12.

- Internet service providers should have a role in providing training. So they get money to build the last mile and they get those customers, they should have some obligation to provide some digital literacy training.
- These needs, objectives, and activities are very much focused on skill building for jobs. It's not all about jobs. People need these digital skills even if they're not going into the workforce.
- As far as training for "educators," you have to explore the needs of tech/digital skill trainers and identify the stakeholder groups that have a role in providing those trainings. What trainings do they need to be able to teach digital skills?

Privacy and Cybersecurity

Needs

- Provide information, training, and resources to help promote safe online interactions. This can focus on the ACP subscribers, but more generally it needs to start at the school level. Overall, children and elderly are the two most populations, so they need to be addressed.
- Shifting the burden of protection away from individuals is tremendously important. This might involve more regulation to prevent always-on listening devices (e.g., Amazon Echo, Google Home, Apple HomePod) from mining your data.
- Regulation can be used to relieve the burden for online safety from the individual a little bit. This is happening in Europe, and there needs to be an accountability mechanism for companies that violate these regulations (e.g., fines).
- There needs to be an emphasis on helping people keep their personal information safe, avoid being duped by phishing and spam emails.
- Becoming comfortable with the internet is a function of there being appropriate legislation as well, being imposed on banks or others who might abuse the internet. To the extent that ConnectALL can play a role in promoting and promulgating legislation and regulation that helps to build a safer ecosystem, that should translate into people feeling more comfortable about using broadband.

Activities

- Service providers should be compelled to provide a lot of security protection, since the data flows in and out through their equipment.
- Social engineering is a much bigger concern than technical hacking/cracking. Privacy and cybersecurity training needs to place a strong emphasis on recognizing and avoiding social engineering attempts. How do we raise awareness of these issues? Is it similar to a public health campaign?
- Laws on phishing/scamming/social engineering need to be much stronger, though they're harder to enforce because a lot of it takes place out of country.
- Publishing guidance on key elements to digital safety and ensure awareness of safety measures and data privacy are consistent across school districts is a heavy lift. School districts need funding for full-time data privacy officers. Currently, those responsibilities fall onto an existing staff person and their already busy workload.

- Seniors and New Americans (e.g., refugees) are a very high risk population as far as privacy, cybersecurity, and online safety are concerned.
- ConnectALL must leverage partnerships with organizations working with covered populations (e.g., AARP for seniors) to ensure that guidance is published and makes its way to these people. Across all activities, it makes sense for ConnectALL to ensure that they're partnering with the right organizations that they can leverage to do the tasks that need to be done to reach the populations they need to reach.

Accessible Resources and Services

Needs
- The needs are very hard to understand as they're written.

Activities
- Outreach needs to happen through organizations that people already have contact with. Instead of creating a new outreach program, take advantage of people's existing contact with the government to get them the information about accessing resources and services.
- Standardization is good. Is there an opportunity to create standards beyond just New York State? Ideally, this is done on a larger scale so that government websites are consistent across levels (local, state, federal).
- ADA compliance should be a minimum standard, but the goal should be to be far more accessible than ADA compliant. ADA was passed near the dawn of the internet, so it doesn't do a good job with updated standards.
- New York State needs to continue funding for Novel New York, which is a suite of online, vetted, reliable databases that are accessible anywhere in New York. It's been a critical resource for schools, public libraries, and academic libraries.
- Government websites need to be written in plain language and intellectually accessible. This will help not just people with intellectual disabilities, but everyone.
- What does it mean to explore methods of shifting the burden of protection away from individuals? What does that look like?
- Take advantage of the existing connections that people with disabilities have with other providers and use those providers to identify opportunities to meet needs.
- Security and privacy are especially important for government websites, because if your personal information gets hacked or leaked from using a government website, they'll lose trust in the government.
- Why limit accessibility considerations only to government services? Maybe it should be community services in general.