



County of Los Angeles  
**INTERNAL SERVICES DEPARTMENT**

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To: Supervisor Holly J. Mitchell, Chair  
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Supervisor Sheila Kuehl  
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From: Selwyn Hollins   
Director

**QUARTERLY UPDATE – INVESTMENTS TO ACCELERATE DIGITAL EQUITY**

On November 16, 2021, the Board of Supervisors (Board) approved a motion to invest in immediate and longer-term efforts to provide affordable and reliable high-speed internet services to underserved communities impacted by the digital divide (Board Agenda Item 19). The motion designated the Internal Services Department (ISD) as the lead department responsible for coordinating the County's efforts on all community broadband infrastructure and residential service initiatives to close the digital divide. The motion also included several directives and instructed the ISD Director to report back to the Board with quarterly progress updates.

Attached for your review is the first quarterly update.

If you have any questions, please contact me at (323) 267-2101.

SH:sh

c: Executive Office, Board of Supervisors  
Chief Executive Office  
County Counsel  
Department of Public Works

**COUNTY OF LOS ANGELES  
INTERNAL SERVICES DEPARTMENT  
INVESTMENTS TO ACCELERATE DIGITAL EQUITY**

**QUARTERLY PROGRESS REPORT  
February 2022**

On November 16, 2021, the Board of Supervisors (Board) approved a motion to invest in immediate and longer-term efforts to provide affordable and reliable high-speed internet services to underserved communities impacted by the digital divide (Board Agenda Item 19).<sup>1</sup> This report provides a progress update on efforts to achieve the directives stated in the motion.

<b>Directive #1: Establish the County's lead department.</b>	
Directive	Status
a. Designate the Internal Services Department (ISD) as the lead department responsible for ensuring the County's efforts on all community broadband infrastructure and residential service initiatives to close the Digital Divide are coordinated and aligned under the County's Digital Divide Action Team, which is comprised of representatives from all County Departments and the Chief Executive Officer's Chief Information Office (CIO).	Completed

a. Lead Department

In April 2021, the CIO established the Los Angeles County Digital Divide Action Team Committee to develop a digital divide action plan aggregating all existing and planned digital divide efforts among County departments. The committee is chaired by the CIO and governed by provisions of a written charter. Members include executives and senior managers representing most County departments. ISD has been a member of the committee since its inception.

On November 18, 2021, the CIO facilitated a regular meeting of the committee and included ISD on the agenda to discuss the directives of the Board motion. After this meeting, ISD engaged with several departments in aligning initiatives to facilitate broadband access to underserved communities impacted by the digital divide. Additionally, ISD has proactively engaged in broadband access planning with other public

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<sup>1</sup> [Los Angeles County Board of Supervisors, Statement of Proceedings for the Regular Meeting, November 16, 2021](#)

agencies, private sectors, community-based organizations, and various regional consortia.

As the designated lead department, ISD has also responded to Federal and State requests for public comments on regulatory policies that will impact the availability of funding for investments in the County’s broadband strategy. All comments were submitted in coordination with the CIO, County Counsel, and Chief Executive Office. The policies included:

- November 2021: Comments to the California Public Utilities Commission (CPUC) Rulemaking for Apportionment of Funds for Federal Funding Account Grant Program.
- December 2021: Comments to the Federal Communications Commission (FCC) Rulemaking for the Affordable Connectivity Program.
- February 2022: Comments to the National Telecommunications and Information Administration (NTIA) Rulemaking for the Infrastructure Investment and Jobs Act Implementation.

<b>Directive #2: Conduct a Countywide campaign on financial subsidy programs.</b>	
Directive	Status
a. Instruct the Chief Executive Office (CEO), in consultation with ISD, to identify funding for a countywide promotional campaign to inform and educate constituents about financial subsidy programs that will assist with the costs of computers and internet service.	Completed
b. Instruct ISD through the Delete The Divide initiative to coordinate the countywide promotional campaign and subsidy programs, specifically the Federal Emergency Broadband Benefit. Additionally, the campaign should encourage the participation of all County Departments and, as appropriate, collaborations with internet service providers, telecommunication companies, school districts, regional consortia, community-based organizations, non-profits, and ethnic and hyperlocal media. Outreach must be conducted in the County’s multiple threshold languages.	Completed <i>Phase 1: EBB promotion</i>  In Progress <i>Phase 2: ACP and other subsidy promotions</i>

a. Funding for Countywide Promotional Campaign

The CEO has identified \$3 million in one-time funding to support the countywide promotional campaign.

b. Promotional Campaign

On May 12, 2021, the Federal Communications Commission (FCC) launched the Emergency Broadband Benefit (EBB) Program to help families and households struggling to afford internet service during the COVID-19 pandemic. The \$3.2 billion program provided qualifying households with a monthly subsidy up to \$50 for broadband service and a one-time subsidy up to \$100 for the purchase of a computer, laptop or tablet. Eligible households on Tribal lands could receive a total monthly discount of up to \$75.

A member of a household needed to meet one of the following criteria for the household to be eligible:

- Income at or below 135% of the Federal Poverty Guidelines or participates in certain assistance programs, such as SNAP, Medicaid or Lifeline.
- Approved to receive benefits under the free and reduced-price school lunch program or school breakfast program.
- Received a Federal Pell Grant during the current award year.
- Experienced a substantial loss of income due to job loss or furlough since February 29, 2020 and the household had a total income in 2020 at or below \$99,000 for single filers and \$198,000 for joint filers.
- Met the eligibility criteria for participating providers' existing low-income or COVID-19 program.

The enrollment process required two steps: 1) Submit an application for approval from the FCC, and 2) Contact a preferred participating provider to select an eligible plan and have the discount applied to the monthly bill. The financial subsidy was limited to one monthly service discount and one device per household, and benefits are paid by the EBB program directly to the provider.

An estimated 822,000 households in Los Angeles County are eligible for EBB, but FCC data indicates that less than 45% of eligible households are currently enrolled in the program. A related study by the University of Southern California examined broadband affordability and explored awareness and adoption of the EBB program among low-income households in California. The findings indicated many potential beneficiaries of the program are deterred by lack of information about eligibility and the application procedures.<sup>2</sup>

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<sup>2</sup> [Galperin, H., Bar, F. & Le, T. \(2021\). Broadband Affordability and the Emergency Broadband Benefit in California. \*Connected Communities and Inclusive Growth\*](#)

On December 6, 2021, ISD launched a countywide promotional campaign to increase awareness of the EBB and encourage residents to enroll in the program (2.5 weeks after Board approval of the motion on November 16, 2021). The campaign consisted of a targeted multimedia, multi-language effort with support from the Board of Supervisors, 19 County departments, and numerous community-based organizations, school districts, medical agencies, faith-based organizations, and local businesses. The campaign was limited in duration to only 3 weeks because the EBB enrollment deadline was December 30, 2021.

In consideration of the time constraints, ISD implemented the promotional campaign in partnership with the California Emerging Technology Fund (CETF). CETF is a non-profit organization established by the California Public Utilities Commission for the purpose of advancing broadband access to underserved communities throughout the State of California. This partnership helped to ensure the consistency of promotional communications by utilizing existing statewide marketing models, which also minimized the costs associated with planning, logistics, public outreach, messaging, and data collection.

The following are the major promotional activities of the campaign. It should be noted that many County departments and partner organizations added value beyond these activities by proactively marketing EBB through their communication networks and professional affiliations.

- Training – ISD hosted 4 virtual training sessions on the EBB and enrollment process. The training was facilitated by CETF to 95 representatives from different County departments and partner organizations responsible for advising constituents on public resources.
- Media Buys – Press statements and ad units were provided to various media outlets to publish, which included call center telephone numbers and websites to assist with the enrollment process. Media marketing generated over 16 million impressions:

<u>Media</u>	<u>Impressions</u>
Television	12,633,946
Radio	2,946,099
Print	889,800
Facebook	347,563
<u>Google Search</u>	<u>2,710</u>
Total	16,900,118

- Media Interviews and Press Releases – A news media event was hosted at ISD Headquarters to answer questions regarding the EBB as well as the County’s Delete The Divide initiative. Participants included reporters from 17 television, radio and newspaper outlets, including hyper-local and ethnic media.

Additionally, op-ed articles authored by Board Supervisors and press releases were published among 38 targeted community media outlets. This news coverage generated over 5 million ethnic media impressions:

<u>Media</u>	<u>Impressions</u>
Chinese	2,847,800
Hispanic	820,593
Filipino	525,000
African-American <sup>3</sup>	516,270
<u>Korean</u>	<u>450,000</u>
Total	5,159,663

- Printed Materials – Printed flyers and tri-fold brochures were distributed to County departments and partner organizations for distribution to constituents at offices, field visits and community events. A total of 457,400 multi-language collateral materials were provided:

<u>Brochures</u>		<u>Flyers</u>	
English	26,600	English/Spanish	148,350
Spanish	24,800	English/Chinese	114,500
Chinese	12,800	English/Korean	56,700
Korean	10,000	<u>English/Vietnamese</u>	<u>57,250</u>
<u>Vietnamese</u>	<u>6,400</u>	Total	376,800
Total	80,600		

- Digital Marketing – County departments and partner organizations were provided with a social press toolkit with assets to post on social media sites. There were 1,377 landing page views and 67 social media posts and shares.
- Text Messaging – A text message was developed for County departments and partner organizations that have experience sending automated text notifications to constituents in the target population. A total of 113,407 texts were sent via school districts and healthcare agencies.
- Telephone Calls – A total of 16,476 pre-recorded telephone messages were disseminated by school districts.
- Electronic Mail – A total of 17,638 emails were transmitted by school districts.
- Call Centers – CETF provided support with telephonic call centers to assist constituents with questions and EBB enrollments. The intake process received more than 5,000 calls/leads generated from the County’s promotional campaign:

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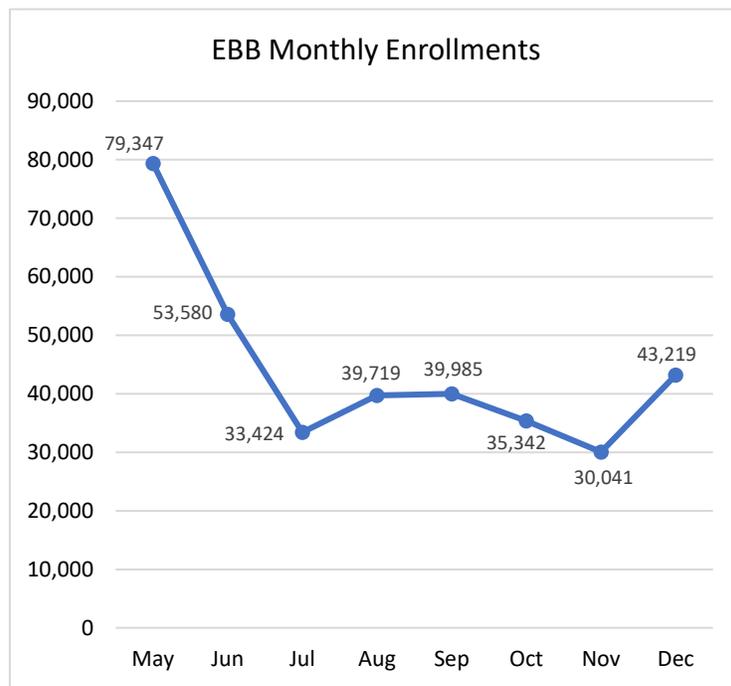
<sup>3</sup> Includes the general media market.

<u>Media</u>	<u>Calls</u>
Television	1,630
Radio	508
Print	133
Facebook	878
Google Search	32
<u>Other Promotions</u>	<u>1,837</u>
Total	5,018

Click on the following icon to view promotional materials and playback sample television and radio broadcasts:



FCC data based on zip codes indicate that new EBB enrollments in Los Angeles County reached 43,219 in December 2021.<sup>4</sup> This was a 43% increase from the previous month total of 30,041. It was also the highest monthly increase in new enrollments since the early stages of the program and reflects a spike among declining enrollments over the preceding months:



<sup>4</sup> Enrollments may vary from actual counts because some zip codes are shared by adjacent counties.

As of December 31, 2021, Los Angeles County had the largest number of household enrollments in the EBB program among counties within California:

<u>County</u>	<u>Total Enrollments</u>
<b>Los Angeles</b>	<b>354,657</b>
San Bernardino	112,097
San Diego	88,627
Riverside	84,256
Orange	71,903
All Other Counties	<u>379,941</u>
Total	1,091,511

On December 31, 2021, the EBB was replaced by the \$14 billion Affordable Connectivity Program (ACP).<sup>5</sup> Under this new program, the monthly broadband benefit is reduced from \$50 to \$30. The monthly benefit will remain \$75 for households on qualifying Tribal lands. Additionally, the income eligibility was raised from 135% to 200% of the Federal Poverty Line.

All households that enrolled in the EBB program will continue to receive their current monthly benefit up to \$50 until March 1, 2022, after which the benefit will change to \$30. EBB recipients do not need to take any action to continue receiving the monthly discount and will automatically transition to the ACP. However, households that qualified for EBB due to a substantial loss of income resulting from job loss or furlough since February 29, 2020 will need to requalify for ACP once the transition period ends on March 1, 2022. Similarly, households that met the eligibility criteria for a participating provider's COVID-19 program will need to requalify. In January 2022, these households were provided information about the steps they needed to take from the program administrator or their internet service provider.

More than 354,000 households are currently enrolled in the ACP (formerly EBB program), but this count is well below the estimated 822,000 households that are eligible. ISD is planning to launch a second phase of the promotional campaign to expand efforts in encouraging enrollments in the ACP as well as other financial subsidy programs. The second phase will begin in late February 2022 and continue for up to 9 months with a goal of enrolling more than 75% of eligible households. It will include a refined marketing strategy, disseminate information in more languages, and implement a workforce program with Digital Navigators. The Digital Navigators will be hired from within the targeted communities in close coordination with community-based organizations. All workers will be trained to provide constituents with in-person assistance in understanding and applying for subsidies, finding affordable devices, and technical support for accessing the internet.

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<sup>5</sup> Affordable Connectivity Program website: <https://www.fcc.gov/acp>

ISD is currently planning a Digital Navigators program and will engage community-based organizations and existing practitioners to inform the program’s design. In coordination with its consultant team, ISD will conduct outreach beginning in the month of February and interview several community-based organizations and/or existing practitioners. An RFC will also be released to obtain public feedback. The information collected will be used to develop a competitive solicitation process.

Additionally, ISD will seek more engagement from internet service providers and telecommunication companies in joining the County’s efforts to promote and encourage new enrollments in the ACP.

<b>Directive #3: Expand and/or enter into new agreements with the County’s existing broadband and/or carrier agreements for public access and use.</b>	
Directive	Status
a. Instruct and authorize ISD to negotiate agreements with assistance from County Counsel and input from the CEO, with internet service providers and telecommunication companies and if the proposed agreement can be shown by ISD to be in the County’s best interest, return to the Board for approval to execute new agreements or amend existing agreements.	In Progress

a. Negotiation of New and Existing Agreements

ISD has engaged with some internet service providers and telecommunication companies regarding affordable and reliable high-speed internet service for households in underserved communities. The discussions have centered on reduced-rate service options if the County were to accept responsibility for direct payment of monthly fees to the service provider. Companies have suggested below market service plans with added incentives. However, as of the date of this report, ISD has not received a written proposal from any company or negotiated any agreements. Discussions are ongoing.

<b>Directive #4: Provide options for internet solutions, including cost estimates and timeline, that meet the digital needs of our most vulnerable residents: affordability, sustainability, and connectivity to high speed, quality service.</b>	
Directive	Status
a. Authorize ISD to amend its agreement, as needed, with the contractor that assisted in the development of its report to the Board in response to Item 45G of the August 31, 2021 Agenda, to perform additional analysis for the options identified in the aforementioned report and provide program development services for future solicitations.	Completed

Directive	Status
<p>b. Instruct ISD to administer a competitive solicitation to acquire a Managed Service Provider to coordinate and manage implementation of the Community Wireless Network. The scope of work should include, but not be limited to, project management, infrastructure design, system integrations, performance requirements, equipment testing and maintenance, administration of resources, and customer support services.</p>	<p>In Progress</p>
<p>c. Instruct ISD to administer a competitive solicitation and negotiate agreements for public-private partnerships to construct and configure the Community Wireless Network.</p>	<p>In Progress</p>
<p>d. Instruct CEO, in consultation with ISD and DPW [Department of Public Works] to identify funding from Federal, State and/or County sources to support a five (5) year proof of concept model for a Community Wireless Network. Under the coordination of ISD, this pilot will utilize public-private partnerships and a Managed Service Provider for the deployment of a fully functional network of Citizen Broadband Radio Service and/or millimeter wave technologies to deliver reliable high-speed internet service to 12,500 households in digital divide target areas.</p>	<p>In Progress</p>
<p>e. Delegate authority to the CEO to hire a consultant to conduct a financial and technical feasibility study for a County-administered municipal broadband service. The study should assess capital costs and consumer pricing models that will enable reliable high-speed internet access for households in digital divide target areas. The study should also consider existing County assets and licensing agreements as well as the utilization of public and private fiber optic and wireless network infrastructures that can be included in the County-administered strategy.</p>	<p>In Progress</p>

a. Amend Contractor Agreement for Additional Analysis

On December 21, 2021, ISD amended its original agreement with the contractor that assisted in the development of its report to the Board in response to Item 45G of the August 31, 2021 Agenda. The contractor will perform additional analysis for the options identified in the aforementioned report and provide program development services for future solicitations. Additionally, the contractor will support ISD in the sourcing of new Managed Service Providers and community-based organizations required for the Digital Navigator services, among other tasks aligned with this initiative.

b. Solicitation for Managed Service Provider(s)

The County is not currently equipped or positioned to carry out the logistics necessary to enable internet services in residential areas. Thus, ISD will be administering a competitive solicitation to onboard one or more Managed Service Providers to coordinate and manage implementation of a Community Wireless Network. The network is intended to be a 5-year pilot to provide free broadband access through public-private partnerships to 12,500 or more households in underserved communities in Los Angeles County.

Over the past several months, ISD conducted extensive market research of the technologies, logistics and administration required to deliver reliable, high-speed broadband services for a Community Wireless Network. ISD also commissioned a study to identify County assets and prospective service areas for offering residential broadband access. Additionally, ISD participated in discussions with GoldenStateNet on strategic designs of the middle-mile infrastructure that can facilitate cost and efficiency gains for last-mile connections.<sup>6</sup> GoldenStateNet is the name of the network created by CENIC's California Middle Mile Broadband Initiative (CCMMBI) to manage the development, acquisition, construction, maintenance, and operation of the statewide open-access middle-mile broadband network. CCMMBI was selected by the California Department of Technology as its third-party administrator to manage the statewide open-access middle-mile broadband network, which is funded through Governor Gavin Newsom's \$6 billion "Broadband For All" legislation (Senate Bill No. 156).

In the interest of an inclusive process, ISD also issued a Request For Comments (RFC) from January 7, 2022 through January 21, 2022. The purpose was to obtain input from market participants to inform the solicitation requirements, network structure, technical specifications, evaluation metrics, and any other topics that will be instructive to facilitating a competitive solicitation. The RFC was widely disseminated to different industry sectors, public agencies and community-based organizations.

The RFC resulted in 33 written submissions from various entities, including service providers, equipment providers, community-based organizations, consortia, constituents, and an academic institution. In parallel, ISD's consultant outreached directly to 38 active firms in the wireless broadband industry to conduct market research interviews. These firms included managed service providers, original equipment manufacturers, and priority access license owners.

The interviews provided valuable information, such as potential technical approaches, data requirements, partnership structures, and evaluation parameters necessary to facilitate a competitive Request for Statement of Qualifications (RFSQ). The RFSQ is designed as a bench contract that will pre-qualify one or more managed services providers to compete for future work orders to deploy broadband networks in communities

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<sup>6</sup> The California Department of Technology defines middle-mile as the physical mid-section of the infrastructure required to enable internet connectivity for homes, businesses, and community institutions. The middle-mile is made up of high-capacity fiber lines that carry large amounts of data at high speeds over long distances between local networks and global internet networks.

impacted by the digital divide. The RFSQ approach promotes competition amongst providers during the pilot phase and allows the County to expand the project's scope as new communities are identified for deployment.

The competitive solicitation is targeted for release in March 2022.

c. Solicitation for Public-Private Partnerships

In coordination with the solicitation discussed in 4(b) above, ISD will seek Board approval to execute public-private partnerships upon award and execution of the agreement with one or more Managed Service Providers. ISD is reviewing the feasibility and interest in the market for potential public-private partnerships with utilities and other owners of assets that would support the project. Recently, the County and City of Los Angeles signed a Memorandum of Understanding (MOU) that established a working partnership to commit resources towards digital equity and inclusion that will ensure residents and businesses have access to reliable high-speed internet. Both agencies will deploy their competitive advantages (including assets and operations) to bring new public connectivity infrastructure to communities and encourage collaboration on projects and funding opportunities that maximize efficiencies and public impact while reducing duplication of efforts and building toward a comprehensive regional strategy. This MOU was developed in consultation with County Counsel and City Attorney, and is in the interest of collaboration and alignment. Formal agreements may be negotiated should the need arise due to specific obligations, such as matters involving costs and indemnifications. ISD will seek Board approval to execute any formal agreements.

d. Funding for Community Wireless Network

The CEO, ISD, and DPW continue to explore Federal, State, and County funding sources. Updates will be provided in future report backs.

e. Feasibility Study for County-Administered Broadband Service

The CEO will utilize market research of the technologies, logistics and administration required to deliver reliable, high-speed broadband networks to develop the requirements for a competitive solicitation to hire a consultant to conduct a financial and technical feasibility study for a County-administered municipal broadband service.