Minnesota's Digital Opportunity Plan

APPENDICES

EMPLOYMENT AND ECONOMIC DEVELOPMENT
OFFICE OF BROADBAND DEVELOPMENT

Appendix A | Digital Connection Committee List

As of November 15, 2023, the following Digital Connection Committees (DCCs) were registered with OBD. DCCs receiving Assessing Digital Inclusion Mini Grants are denoted using an asterisk after their host organization name.

NTIA asked OBD to include which covered populations are represented by or reached by each DCC. This is reflected in the columns labeled 1–8:

(1) People living in rural areas
(2) Modern elders
(3) People from minoritized racial and ethnic groups
(4) People with disabilities
(5) Veterans
(6) People who are incarcerated or re-entering society
(7) People experiencing English language barriers
(8) People living in low-income households

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
30,000 Feet	Saint Paul			x					x
African Career, Education & Resources, Inc. (ACER)	Brooklyn Park	x	x	x				x	x
African Community Senior Services*	Minneapolis		x	x	x			x	x
AG Consulting and Media*	Minneapolis			x				x	x
Aitkin County*	Aitkin	x	x	x	x	x			x
Alliance for Asian Pacific Minnesotans*	Rochester		x	x				x	x
Asian Media Access*	Minneapolis		x	x		x		x	x
Aurora/St. Anthony Neighborhood Development Corp.*	Saint Paul		x	x					x

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Austin Aspires*	Austin	x	x	x	x	x		x	x
Beyond Media Solutions*	Brooklyn Park			x				x	x
Biwabik Township	Gilbert	x	x			x			x
CCX Media*	Brooklyn Park		x	x	x	x		x	x
Chinese American Chamber of Commerce*	Bloomington			x				x	x
Chinese Cultural Center*	Bloomington			x				x	x
City of Columbia Heights*	Columbia Heights		x	x	x	x		x	x
City of Dennison*	Dennison	x	x						x
City of Duluth*	Duluth	x	x	x	x	x		x	x
City of Minneapolis - Communications Department	Minneapolis	x	x	x	x	x		x	x
Community Technology Empowerment Project (CTEP)	Saint Paul			x					x
Dorothy Day Center	Saint Paul	x		x	x			x	x
East Central Regional Arts Council	Hinckley	x							
East Central Minnesota Educational Cable Cooperative (ECMECC)	Braham	x		x	x			x	x
Family Service Rochester*	Rochester	x	x	x	x	x		x	x
Fergus Falls Public Library	Fergus Falls	x	x	x	x	x	x	x	x

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Gifts For Seniors*	Minneapolis	x	x	x	x	x		x	x
Global Entrepreneurship Week Minnesota*	Minneapolis			x	x			x	x
GMCC (formerly Greater Minneapolis Council on Churches)*	Minneapolis		x	x	x	x	x	x	x
Greater Mankato Growth, Inc.	Mankato	x	x	x	x	x		x	x
Grow Us	Minneapolis	x	x	x	x	x	x	x	x
Headwaters Regional Development Commission*	Bemidji	x	x		x	x			x
HealtheMed, Inc.	Minnetonka	x	x	x	x	x		x	x
Hennepin County Office of Broadband and Digital Inclusion	Minneapolis		x	x	x		x	x	x
Hennepin Healthcare	Minneapolis		x	x	x		x	x	x
Hibbing Public Library*	Hibbing	x	x		x				x
Hired*	Bloomington		x	x	x	x	x	x	x
Hispanic Advocacy and Community Engagement Through Research (HACER)*	Saint Paul			x				x	x
Hubbs Center	Saint Paul			x				x	x
Ideal Township	Pequot Lakes	x	x	x	x	x			x
International Institute of Minnesota*	Saint Paul			x				x	

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Irreducible Grace Foundation*	Saint Paul			x					x
ISD 622, 624, and 832 Adult Education	Maplewood		x	x	x	x		x	x
Kairos Alive*	Minneapolis	x	x	x	x			x	x
Kandiyohi County and City of Willmar Economic Development Commission*	Willmar	x	x	x	x	x		x	x
Koochiching Technology Initiative*	International Falls	x	x	x	x	x			x
Leech Lake Band of Ojibwe*	Cass Lake	x	x	x	x	x	x	x	x
Literacy Minnesota*	Saint Paul							x	x
Little Crow Telemedia Network	Hutchinson	x		x				x	x
Mahnomen County Economic Development Commission	Mahnomen	x	x	x	x	x		x	x
Metro North Adult Basic Education	Anoka	x	x	x	x	x	x	x	x
Metropolitan Library Service Agency (MELSA)	Saint Paul		x	x	x	x		x	x
Minnesota Alliance of Boys and Girls Clubs*	Roseville	x		x				x	x
Minnesota Department of Education	Minneapolis	x		x	x		x	x	x
Mower County Seniors, Inc.*	Austin	x	x		x	x			
North Metro Telecommunications Commission*	Blaine		x	x	x	x		x	x

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
North Suburban Communications Commission*	Roseville		x	x	x	x		x	x
Northfield Healthy Community Initiative*	Northfield	x		x				x	x
Northland Hackathon	Fergus Falls	x							x
Northspan Group, Inc.	Duluth	x	x	x	x	x	x	x	x
Oromo Community of Minnesota*	Saint Paul			x				x	x
Otter Tail County	Fergus Falls	x	x	x	x	x	x	x	x
OurTech Co-Op*	Roseville		x	x	x	x		x	x
PCs for People	Saint Paul			x					x
Phyllis Wheatley Community Center	Minneapolis			x					
Pine County*	Pine City	x	x	x	x	x	x		x
Project 1590*	Truman	x	x			x			x
Quad City Public Libraries (Eveleth, Gilbert, Mountain Iron, Virginia)*	Virginia	x	x	x	x	x			x
Quatrefoil Library	Minneapolis	x	x	x	x				x
Raíces Latinas*	Stillwater		x	x				x	x
Ramsey County and City of Saint Paul	Saint Paul		x	x	x	x	x	x	x
Reconnect Rondo*	Saint Paul		x	x	x	x		x	x

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Repowered*	Saint Paul						x		
Rice County*	Faribault	x	x	x	x	x	x	x	x
Rock County Community Library	Luverne	x	x	x	x	x		x	x
Roots Wellness Center*	Saint Paul		x	x	x	x	x	x	x
Saint Paul Community Literacy Consortium	Saint Paul			x	x		x	x	x
SDK Communications + Consulting	Minneapolis		x	x	x		x	x	x
Senior Community Services*	Minnetonka		x		x	x			
Smart North*	Minneapolis			x				x	x
South Central Service Coop / Socrates Online*	North Mankato	x		x	x			x	x
South Washington County Telecommunication Commission*	Cottage Grove		x	x	x	x	x	x	x
Southwest Center for Independent Living	Marshall	x	x	x	x	x		x	x
St. Paul & Minnesota Foundation - Partnership for a Connected MN	Saint Paul	x	x	x	x	x		x	x
Thai Cultural Council*	Saint Louis Park		x	x	x	x		x	x
Todd County Broadband Coalition*	Bertha	x	x	x	x	x	x	x	x
Town of White*	Aurora	x	x		x	x			x
Traverse Des Sioux Library Cooperative*	Mankato	x	x	x	x	x		x	x

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Twin Cities West Metro Asian Fair*	Plymouth		x	x	x	x		x	x
UMN - Twin Cities: Urban Research and Outreach Center	Minneapolis		x	x	x	x	x	x	x
UMN - Crookston: Veden Center for Rural Development*	Crookston	x							
Upper Minnesota Valley Regional Development Commission*	Appleton	x							
Urban Strategies*	Minneapolis		x	x	x	x	x	x	x
Viking Library System*	Fergus Falls	x							
Virginia Housing Authority	Virginia		x		x	x			x
Waseca-Le Sueur Library System*	Waseca	x							
Wilderness Health*	Two Harbors	x	x	x	x	x		x	x
Women's Wellness and Parenting Support Center*	Bloomington		x	x	x			x	x
Wright County	Buffalo	x	x	x	x	x		x	x
YNIIGI - You Need It, I Got It, LLC	Minneapolis		x	x	x	x	x	x	x
Zephyr Valley Community Coop	Rushford	x							

Appendix B | Collaborators

While assembling this plan, OBD met in some capacity with the following organizations and agencies. These meetings occurred from December 1, 2022 through November 15, 2023. Asterisks denote organizations and agencies where meetings were held at least in part due to their Digital Connection Committee participation.

- 1 Day at a Time
- AARP Minnesota
- African Career, Education, & Resources, Inc. (ACER)*
- African Community Senior Services*
- AG Consulting and Media*
- Aitkin County*
- All Elders United for Justice
- Alliance for Asian Pacific Minnesotans*
- Ameelio
- Asian Media Access*
- ASL Now
- Aurora/St. Anthony Neighborhood Development Corp.*
- Austin Aspires*
- Beyond Media Solutions*
- CCX Media*
- Chinese American Chamber of Commerce*
- Chinese Cultural Center*
- City of Columbia Heights*
- City of Duluth*
- Collectivity
- Comcast
- Common Sense Media
- Communications Workers of America
- Council of Regional Public Library System Administrators
- Digitunity
- Duluth Aging Services
- Economic Development Association of Minnesota
- EducationSuperHighway
- Family Service Rochester*
- Federal Reserve Bank of Minneapolis: Center for Indian Country Development
- Fond du Lac Band of Lake Superior Chippewa
- Gifts for Seniors*
- Girls Dream Code

- Global Entrepreneurship Week Minnesota*
- GMCC (formerly Greater Minneapolis Council on Churches)*
- Governor's Task Force on Broadband
- Great River Regional Library
- Greater Mankato Growth*
- Grow Us*
- Hallie Q. Brown Community Center
- Headwaters Regional Development Commission*
- HealtheMed, Inc.*
- Hennepin County
- Hibbing Public Library*
- Hired*
- Hispanic Advocacy and Community Engagement Through Research (HACER)*
- International Institute of Minnesota*
- Irreducible Grace Foundation*
- Kairos Alive*
- Kandiyohi County and City of Willmar Economic Development Commission*
- Koochiching Technology Initiative*
- Lead for America: American Connection Corps
- League of Minnesota Cities
- Leech Lake Band of Ojibwe*
- Leech Lake Tribal College
- Literacy Minnesota*
- Lower Sioux Indian Community
- Maamigan Achigaazo – White Earth Community Library
- Metro Meals on Wheels
- Metropolitan Library Service Agency (MELSA)*
- Minitex
    - Minitex Connect Conference
    - Policy Advisory Council
- Minneapolis City Councilor LaTrisha Vetaw
- Minneapolis Youth Coordinating Board*
- Minnesota Alliance of Boys and Girls Clubs*
- Minnesota Association of Professional County Economic Developers
- Minnesota Association of Townships
- Minnesota Cable Communications Association
- Minnesota Council on Disability
- Minnesota Department of Corrections
- Minnesota Department of Employment and Economic Development
    - CareerForce

    - Governor's Workforce Development Board
    - Small Cities Development Program
- Minnesota Department of Health
    - Health Equity Networks
- Minnesota Department of Human Services
    - Age-Friendly Minnesota
    - Age-Friendly Minnesota Council
    - Children and Family Services
    - Deaf and Hard of Hearing Services Division
- Minnesota Department of Transportation
- Minnesota Library Association
- Minnesota Public Utilities Commission
- Minnesota State Bar Association: Telecommunications Subcommittee
- Mower County Seniors, Inc.*
- Neighborhood House
- North Metro Telecommunications Commission*
- North Suburban Communications Commission*
- Northfield Healthy Community Initiative*
- Northspan Group, Inc.*
- Office of U.S. Senator Amy Klobuchar
- Office of U.S. Senator Tiny Smith
- Oromo Community of Minnesota*
- OurTech Co-Op*
- Paul Bunyan Telecommunications
- Pine County*
- Prairie Island Indian Community
- Project 1590*
- Quad City Public Libraries (Eveleth, Gilbert, Mountain Iron, Virginia)*
- Raíces Latinas*
- Ramsey County
- Range Association of Municipalities and Schools (RAMS)
- Reconnect Rondo*
- Red Lake Nation
- Repowered*
- Rice County*
- Rochester Public Library
- Roots Wellness Center*
- Saint Paul Chamber of Commerce
- Saint Paul Community Literacy Consortium
- Saint Paul Public Library

- SDK Communications + Consulting
- Senior Community Services*
- Shavlik Family Foundation
- Smart North*
- South Central Service Coop / Socrates Online*
- South Washington County Telecommunications Commission*
- Southwest Center for Independent Living*
- Summit Academy OIC
- Thai Cultural Council*
- Three Rivers Community Action
- Todd County Broadband Coalition*
- Town of White*
- Traverse des Sioux Library Cooperative*
- Tribal College Librarians Institute
- Twin Cities West Metro Asian Fair*
- University of Minnesota
    - Great Plains Telehealth Resource and Assistance Center (gpTRAC)
    - Extension
    - Learning Network of Minnesota
    - Urban Research and Outreach Center*
    - Veden Center for Rural Development*
- Upper Minnesota Valley Regional Development Commission*
- Urban Strategies*
- Viking Library System*
- Waseca-Le Sueur Library System*
- Wilderness Health*
- Women's Wellness and Parenting Support Center*
- Zephyr Valley Community Coop*
- Warroad Community Development

Appendix C | Baseline Measures for Covered Populations

Population	Internet Adoption	Devices	Digital Skills	Accessibility
People Living in Rural Areas	66.8%	77.6%	Pending[234]	Pending
Modern Elders	79.6%	77.4%	Pending	Pending
People from Minoritized Races/Ethnicities	78.5%	78.4%	Pending	Pending
Veterans	81.5%	81.0%	Pending	Pending
People with Disabilities	79.0%	69.8%	Pending	Pending
People who are Incarcerated or Re-entering	64.1%[235]	42.2% (laptop)[236] 26.6% (desktop)	Pending	Pending
People Experiencing Language Barriers	65.3%	63.0%	Pending	Pending
People Living in Low-Income Households	75.4%	68.5%	Pending	Pending

Internet adoption refers to Minnesotans' adoption of broadband internet. This measurable objective is aligned with "the availability of, and affordability of access to, fixed and wireless broadband technology" as required in the NOFO. This is measured using ACS data describing the percentage of households that subscribe to broadband internet service.

[234] This component, along with all other occurrences of "pending" in this table, will be determined during Phase 1 of implementation.

[235] This figure is from the survey conducted by Repowered's DCC.

[236] These figures are from the survey conducted by Repowered's DCC.

Devices refers to Minnesotans' access to large-screen devices. This measurable objective is aligned with "the availability and affordability of consumer devices" as required in the NOFO. This is measured using ACS data describing the percentage of households that report having at least one laptop or desktop computer available.

Digital skills refers to Minnesotans' access to training that supports digital skills and cybersecurity awareness. This measurable objective is aligned with "digital literacy" and "technical support for those devices" as required in the NOFO. It is also aligned with "awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual" as required in the NOFO. This is measured using mapping data that describes the percentage of households located within a 60-minute round-trip drive or ride on public transit from the nearest public location (public library, community college, non-profit, CareerForce location, etc.) that provides free basic digital skills and cybersecurity support.

Accessibility refers to the accessibility of web-based state, local, and tribal government information. This measurable objective is aligned with "the online accessibility and inclusivity of public resources and services" as required in the NOFO. This will be measured using an equally-weighted combination of three factors:

(1) the percentage of county, city, and tribal government websites that meet the accessibility standards set forth in Minn. Stat. § 16E.03;
(2) the percentage of county, city, and tribal government websites that reflect a Flesch Readability Score of 90 – 100; and
(3) the percentage of county, city, and tribal government websites that provide translations of certain essential information in alignment with local linguistic diversity.

Appendix D | Target Measures for Covered Populations

Population	Internet Adoption	Devices	Digital Skills	Accessibility
People Living in Rural Areas	88.4%	92.2%	Pending[237]	Pending
Modern Elders	92.9%	92.1%	Pending	Pending
People from Minoritized Races/Ethnicities	92.5%	92.4%	Pending	Pending
Veterans	93.5%	93.4%	Pending	Pending
People with Disabilities	92.7%	89.4%	Pending	Pending
People who are Incarcerated or Re-entering	87.4%	79.8%	Pending	Pending
People Experiencing Language Barriers	87.6%	87.1%	Pending	Pending
People Living in Low-Income Households	91.4%	89.0%	Pending	Pending

Target measures for 2028 were determined through a two-step process:

(1) calculate the factor equivalent to 65% of the gap between 2023 measures and 100%
(2) add this factor to the baseline measure

This example demonstrates target measure calculations for people living in rural areas:

(1) 100% - baseline → 100% - 66.8% = 33.2%
(2) 33.2% + baseline → 33.2% + 66.8% = 88.4%

[237] This component, along with all other occurrences of "pending" in this table, will be determined during Phase 1 of implementation.

Appendix E | Local and Tribal Plans

The table below provides an overview of publicly discoverable tribal, township, city, county, and regional plans addressing one or more of the following six facets relevant to digital opportunity:

(1) Broadband availability: Does the plan assess for and deliver a strategy to expand broadband availability? **This aligns with BEAD.**
(2) Broadband affordability: Does the plan assess for and deliver a strategy to provide lowered broadband costs to low-income households?[238] **This aligns with Objective 1: Internet Access.**
(3) Device availability: Does the plan assess for and deliver a strategy to distribute internet-enabled devices to low-income households? **This aligns with Objective 2: Devices.**
(4) Digital skills: Does the plan assess for and deliver a strategy to improve residents' access to digital skills training? Does the plan assess for and deliver a strategy to improve residents' access to a trusted provider of technical support? **This aligns with Objective 3: Digital Skills.**
(5) Accessibility: Does the plan assess for and deliver a strategy to improve accessibility of its web-based resources? **This aligns with Objective 4: Accessibility.**
(6) Other: This category is elaborated in footnotes.

This list is non-exhaustive. Tribal, township, city, county, and regional officials who would like their plan added or removed from this list may make that request by contacting OBD.

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
Benton County Broadband Feasibility Study	2021	x	x				
Benton County 2040 Comprehensive Plan	2020	x					x[239]
Blue Earth [city] Comprehensive Plan	2019						x[240]
Blue Earth County Broadband Feasibility Study	2019	x					

[238] While many plans identify affordability as a need, fewer present strategies to address this need in a practicable, systemic way.
[239] Stated policy: "Extend broadband service throughout the entire County by 2040."
[240] Stated policy: "Encourage providers of high-speed internet access to stay current with technologies related to the availability of broadband access to the internet."

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
Carlton County Broadband Feasibility Study Report	2016	x					
Cass County Comprehensive Plan	2021	x					
Cherry Township, Executive Summary, Broadband Roadmap	2018	x					
Chisago County Comprehensive Plan	2017						x[241]
Chisholm, Executive Summary, Broadband Roadmap	2018	x					
Clay County Comprehensive Plan	2022						x[242]
Cook County, MN: Land Use Guide Plan	2016	x					
Dakota County, MN: Broadband Survey Report	2022						x[243]
Dodge County, MN, Comprehensive Plan	2019						x[244]
Duluth Digital Access Master Plan	2022	x	x	x	x		
Edina Comprehensive Plan	2020						x[245]

[241] Includes five goals and 14 policies pertaining to broadband infrastructure and adoption.
[242] Identifies broadband development as a necessity in supporting increased demand for telecommuting.
[243] This document presents survey findings relevant to digital opportunity planning.
[244] Stated policy: "Promote access to quality broadband for all of the County's residents by (1) Communicating with existing private broadband providers to discuss challenges to provide broadband service to the rural areas of the County and (2) Identify[ing] opportunities to access State and Federal funding programs to assist in broadband projects."
[245] Stated goal: "Ensure that Edina residents and businesses have access to world-class broadband infrastructure at competitive rates."

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
Fond du Lac Reservation Comprehensive Plan 2020-2040	2021						x[246]
Hennepin County and City of Minneapolis Professional Services Agreement (referenced in this document)	2020	x	x	x	x		
Hibbing, Executive Summary, Broadband Roadmap	2018	x					
International Falls Comprehensive Plan	2020						x[247]
Iron Range Communities Broadband Roadmap	2018	x					
Kerkhoven Comprehensive Plan	2020						x[248]
Laurentian, Tower, and East Range Broadband Roadmap	2021	x					
Le Sueur County Broadband Feasibility Study	2019	x					
Lincoln County Broadband Feasibility Study	2017	x					
Lincoln County Comprehensive Plan	2018						x[249]
Minneapolis 2040	2019	x	x	x	x		x[250]
Mt. Iron and Buhl, Executive Summary, Broadband Roadmap	2018	x					

[246] Addresses tribally owned and operated internet service provider, Aaniin: "Continue the expansion and development of the Aaniin fiber-optic network."
[247] Stated goal: "Expand high-speed internet opportunities."
[248] Stated strategy: "Pursue broadband upgrades for the city throughout the city to enhance its competitive stance for social and economic development."
[249] Stated goal: "Encourage increased investments of telecommunications into the area."
[250] Refer to Policy 50.

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
Murray County Broadband Feasibility Study	2018	x					
Nicollet County Broadband Strategic Plan	2020	x					
Pope County Broadband Feasibility Study	2017	x					
Ramsey County and Saint Paul Connectivity Blueprint	2022	x	x	x	x		
Redwood County Economic Development Broadband Planning	2023	x					x[251]
Saint Louis County Comprehensive Land Use Plan	2019						x[252]
Sebeka Comprehensive Plan	2023						x[253]
Sherburne County Broadband Feasibility Study Report	2016	x					
Stearns County 2040 Comprehensive Plan	2020	x					
Traverse County Broadband Feasibility Study	2016	x					
Waseca County Broadband Strategic Plan	2020	x	x				

[251] Stated vision: Every resident and business in Redwood County will have access to an affordable, reliable, high-speed internet connection delivered by committed community partners skilled in operating and maintaining a successful fiber broadband network."

[252] This plan addresses broadband infrastructure relevant to disaster response: "Promote the expansion of broadband lines and wireless services, especially in remote forests that are susceptible to fire. Reliable mobile communication networks are essential for effective disaster response."

[253] Community-identified project: "Continue to find innovative ways to make broadband access more affordable."

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
Wright County Broadband Assessment and Feasibility Study	2021	x					

Appendix F | Rural/Urban Outliers

The State Digital Equity Planning Grant NOFO provides the following definition:

> The term *rural area* means any area other than: (1) A city or town that has a population of greater than 50,000 inhabitants; (2) Any urbanized area contiguous and adjacent to a city or town that has a population of greater than 50,000 inhabitants; and (3) In the case of a grant or direct loan, a city, town, or incorporated area that has a population of greater than 20,000 inhabitants.

Accordingly, the following list identifies Greater Minnesota cities that are not categorized as "rural" due to their population being greater than 50,000 inhabitants and/or their adjacency to a city that has a population greater than 50,000 inhabitants:[254]

- Duluth, extending to the adjacent cities of Hermantown and Proctor
- East Grand Forks, due to its shared border with Grand Forks, North Dakota
- Moorhead and Oakport, due to their shared border with Fargo, North Dakota
- Rochester
- St. Cloud, extending to the adjacent cities of Rockville, St. Augusta, Sartell, Sauk Rapids, and Waite Park

The following list identifies more Greater Minnesota not categorized as "rural" specifically for the case of grants or direct loans due to their populations exceeding 20,000. These cities may still be eligible for grants, albeit through an eligibility criterion other than rural:

- Austin
- Elk River
- Faribault
- Northfield
- Otsego
- Owatonna
- St. Michael
- Willmar
- Winona

Additionally, the following list identifies Metro cities with populations not greater than 20,000 residents that are categorized as "rural" by the definition of *rural area* used in the NOFO:

Anoka County	Bethel, Centerville, Columbus, East Bethel, Ham Lake, Nowthen, Oak Grove, St. Francis (partial)
Carver County	Carver, Cologne, Hamburg, Mayer, New Germany, Norwood Young America, Victoria, Waconia, Watertown
Dakota County	Coates, Hampton, Miesville, New Trier, Randolph, Vermillion

[254] ACS 5-Year Estimates, 2017–21.

Hennepin County	Excelsior, Greenfield, Greenwood, Hanover (partial), Independence, Long Lake, Loretto, Maple Plain, Minnetonka Beach, Minnetrista, Mound, Rockford (partial), Rogers, Spring Park, St. Bonifacius
Ramsey County	Arden Hills, Gem Lake, Little Canada, North Oaks, North St. Paul, Vadnais Heights, White Bear Lake
Scott County	Belle Plaine, Elko New Market, Jordan, New Prague (partial)
Washington County	Bayport, Birchwood Village, Dellwood, Grant, Hugo, Lake St. Croix Beach, Lakeland, Lakeland Shores, Mahtomedi, Marine on St. Croix, Oak Park Heights, Pine Springs, St. Mary's Point, Scandia, Stillwater, Willernie

Appendix G | Labeled List of Existing Strengths

The following list analyzes all existing strengths as articulated in Section 5.0. Each strength is categorized and labeled to facilitate a greater understanding of the factors at play. The eight strength labels are as follows:

- **Existing state policy, funds, and networks** foster digital opportunity.
- **Federal funds** complement state, local, and private dollars.
- MN's **public libraries** are known **as strong partners** in digital opportunity work.
- MN has a selection of homegrown **programs to bolster device access.**
- MN has tools to support residents' **digital skills.**
- **Grassroots advocates and local experts** eye a more digitally equitable future.
- More **digital navigator roles** are supporting more people.
- People are using technology in **achieving quality-of-life goals.**

Population	Existing Strength as Written	Label
Statewide	Minnesota is not new to broadband policy and deployment.	Existing state policy, funds, and networks
Statewide	Universal broadband access has been a state goal since 2010.	Existing state policy, funds, and networks
Statewide	Since 2014, the state legislature has directed over $380 million toward broadband infrastructure grants.	Existing state policy, funds, and networks
Statewide	Minnesota is pursuing Broadband Equity, Access, and Deployment (BEAD) Funds.	Federal funds
Statewide	Regional Library Telecommunications Aid (RLTA)[255] and Telecommunications/Internet Access Equity Aid (TEA)[256] help public libraries and K12 schools provide internet access.	Public libraries as strong partners
Statewide	The 2023 Minnesota legislature appropriated new funding for programs related to digital opportunity.	Existing state policy, funds, and networks

[255] Minn. Stat. § 134.355.
[256] Minn. Stat. § 125B.26.

Population	Existing Strength as Written	Label
Statewide	Home internet subscription rates are slightly higher among Minnesotans than the national average.	Existing state policy, funds, and networks
Statewide	Minnesota is home to several nationally-recognized computer refurbishers supporting device ownership for individuals from low-income households.	Homegrown device access services
Statewide	Minnesota is a national leader in digital skills assessment.	Digital skills
Statewide	Statewide, Minnesota has 356 public library locations.	Public libraries as strong partners
Statewide	In 2021, Minnesota's public libraries supported 1,236,941 internet sessions on their public computers.	Public libraries as strong partners
Statewide	Minitex, a state-funded library organization, champions Minnesotans' access to information statewide.	Public libraries as strong partners
Statewide	Minnesota statute provides protocols for maintaining government-to-government relationships between the State of Minnesota and the 11 federally recognized tribes sharing this geography.	Existing state policy, funds, and networks
Statewide	The Governor's Task Force on Broadband provides expert cross-sector knowledge about digital opportunity.	Existing state policy, funds, and networks
Statewide	The Minnesota Cybersecurity Task Force contributes to the development of a statewide cybersecurity plan.	Existing state policy, funds, and networks
Statewide	The Minnesota Technology Advisory Council (TAC) advises MNIT and executive branch agencies on strategic information technology initiatives and service delivery.	Existing state policy, funds, and networks
Statewide	University of Minnesota Extension is a reputable skill-developer statewide.	Digital skills

Population	Existing Strength as Written	Label
Statewide	Many philanthropic foundations in Minnesota are digital opportunity supporters.	Grassroots advocates and local experts
Statewide	Multi-lingual digital navigators can provide trusted technology support in people's first languages.	Digital navigator roles
Statewide	Rural and urban communities alike see potential in digital navigator role.	Digital navigator roles
Rural	State funding for broadband deployment is improving high-speed internet availability in rural Minnesota.	Existing state policy, funds, and networks
Rural	Technology access keeps rural Minnesotans connected socially and economically across geographically dispersed communities.	Achieving quality-of-life goals
Rural	Vibrant communities of artists in Greater Minnesota can thrive with high-speed internet access.	Achieving quality-of-life goals
Rural	Counties and organizations in Greater Minnesota are developing new services to get internet-enabled devices in their residents' hands.	Programs to bolster device access
Rural	Some youth living in Greater Minnesota are gaining access to computer science skills outside of school.	Digital skills
Rural	Public libraries—and their knowledgeable staff—are essential.	Public libraries as strong partners
Rural	University of Minnesota Extension is a reputable skill-developer in rural communities.	Digital skills
Rural	CareerForce has 43 of its 55 locations in Greater Minnesota.	Existing state policy, funds, and networks
Rural	Minnesota's 1,780 township governments give rural residents political power.	Grassroots advocates and local experts
Rural	American Connection Corps (ACC) fellows embedded in rural communities tackle localized technology challenges.	Grassroots advocates and local experts

Population	Existing Strength as Written	Label
Modern Elders	Broadband subscriptions are increasing among adults ages 60-plus.	Achieving quality-of-life goals
Modern Elders	ACP can bring modern elders online.	Federal funds
Modern Elders	Computer ownership is rising among adults ages 60-plus.	Programs to bolster device access
Modern Elders	Numerous elder-serving organizations in Minnesota have expanded their services to include technology access. These include groups like African Community Senior Services, Gifts for Seniors, Mower County Seniors, Inc., and Senior Community Services.	Digital navigator roles
Modern Elders	AARP Minnesota is piloting new community technology outreach using Senior Planet.	Digital skills
Modern Elders	Age-Friendly Minnesota actively identifies strategies and collaborators to improve modern elders' quality of life outcomes via access to technology	Existing state policy, funds, and networks
Modern Elders	Adults ages 60-plus with disabilities—including late-onset disabilities like hearing or vision loss—can receive assistive technology services and support through several state agencies and offices.	Existing state policy, funds, and networks
Minoritized Races	Five of the 11 federally recognized tribes sharing the geography of Minnesota were recently awarded federal funding broadband infrastructure and use projects.	Federal funds
Minoritized Races	The Fond du Lac Band of Lake Superior Chippewa's internet service provider—Aaniin—provides fiber-to-the-home across Fond du Lac Nation.	Grassroots advocates and local experts
Minoritized Races	Four tribal colleges and tribal college libraries connect Indigenous students to culturally-grounded higher education.	Grassroots advocates and local experts

Population	Existing Strength as Written	Label
Minoritized Races	Numerous Asian–, Black–, Hispanic–, and Indigenous-led organizations in Minnesota have expanded their services to include technology access.	Digital navigator roles
Minoritized Races	The Black Broadband Summit and Family Broadband Coalition are Black-led initiatives focused on closing the digital divide in the Metro.	Grassroots advocates and local experts
Minoritized Races	The 93rd Minnesota Legislature is the most racially and ethnically diverse in the state's history.	Existing state policy, funds, and networks
Minoritized Races	The state ethnic councils are positioned to advise the state executive branch and legislature on digital opportunity issues affecting people from minoritized racial and ethnic groups.	Existing state policy, funds, and networks
Minoritized Races	An increasing number of Minnesotans from minoritized racial and ethnic groups are earning postsecondary certifications and degrees.	Achieving quality-of-life goals
Veterans	Veterans subscribe to broadband at comparative rates.	Achieving quality-of-life goals
Veterans	Veterans and military families receiving Veterans and Survivor Pension Benefits are eligible for ACP.	Federal funds
Veterans	Five veterans homes operated by the state provide wifi to their residents.	Existing state policy, funds, and networks
Veterans	For veterans seeking education and career skills the Minnesota GI Bill now includes expanded benefits.	Existing state policy, funds, and networks
Veterans	The Minnesota Veterans Application Tracking System (VATS) simplifies the process of applying for benefits and filing claims.	Existing state policy, funds, and networks
Veterans	The U.S. Department of Veterans Affairs supports veterans in receiving telehealth services.	Digital skills
Veterans	The MN Association of County Veteran Service Officers advocates for veterans' needs in all 87	Grassroots advocates and local experts

Population	Existing Strength as Written	Label
	counties; Tribal Veteran Service Officers do the same work with the 11 Native Nations.	
Veterans	Veterans with disabilities can receive assistive technology services and support through several state agencies and offices.	Existing state policy, funds, and networks
People with Disabilities	Broadband subscriptions are increasing among people with disabilities.	Achieving quality-of-life goals
People with Disabilities	People with disabilities receiving Supplemental Social Security Income are eligible for ACP.	Federal funds
People with Disabilities	Telehealth services, digital security systems, and web-based delivery services can help people with disabilities live more independently.	Achieving quality-of-life goals
People with Disabilities	Technology helps people with disabilities stay connected socially.	Achieving quality-of-life goals
People with Disabilities	Numerous organizations in Minnesota serving people with disabilities have expanded to include technology access.	Digital navigator roles
People with Disabilities	Several state agencies and offices provide assistive technologies and technical assistance for people with disabilities.	Existing state policy, funds, and networks
People with Disabilities	Staff at the Centers for Independent Living (CILs) provide comprehensive services to people with disabilities.	Existing state policy, funds, and networks
Incarcerated People	The state Omnibus Judiciary and Public Safety bill, signed into law at the end of the 2023 legislative session, includes language improving prisoner access to technology.	Existing state policy, funds, and networks
Incarcerated People	County jails are exploring digital options to help incarcerated parents stay connected to their children.	Achieving quality-of-life goals

Population	Existing Strength as Written	Label
Incarcerated People	The Minnesota Career Education Center (MCEC) provides Adult Basic Education (ABE) services at nine state prison locations.	Digital skills
Incarcerated People	The MN Department of Corrections provides tablets for all incarcerated students.	Programs bolstering device access
Incarcerated People	MCEC makes assistive technologies available to incarcerated students.	Achieving quality-of-life goals
Incarcerated People	State-supported partnering organizations connect people who are incarcerated and re-entering with digital skills training.	Digital navigator roles
Incarcerated People	College and vocational instructors provide training for information technology careers.	Achieving quality-of-life goals
Incarcerated People	CareerForce provides tailored services for justice-involved individuals.	Existing state policy, funds, and networks
Incarcerated People	ABE instructors teaching through MCEC provide digital skills instruction.	Digital skills
Incarcerated People	Organizations like Repowered support people who are re-entering in gaining work experience while developing technology skills.	Achieving quality-of-life goals
Language Barriers	Minnesota's most linguistically diverse communities are often located in areas with broadband access.	Achieving quality-of-life goals
Language Barriers	Households primarily speaking a language other than English are more likely to be digitally connected if K12 students reside there.	Grassroots advocates and local experts
Language Barriers	People can use technology to develop their English skills throughout their daily lives.	Achieving quality-of-life goals
Language Barriers	Technology is essential in helping immigrants and refugees stay connected to family, friends, and culture.	Achieving quality-of-life goals

Population	Existing Strength as Written	Label
Language Barriers	ACP resources are available in many languages.	Federal funds
Language Barriers	Public libraries are a frequent place people with limited English fluency and/or limited English literacy go to get internet access.	Public libraries as strong partners
Language Barriers	Numerous organizations serving people experiencing language barriers have expanded to include technology access.	Digital navigator roles
Language Barriers	MN Adult Basic Education (ABE) specializes in providing support for people building English fluency and/or English literacy skills	Digital skills
Low-Income	Local and tribal governments are running programs to keep low-income residents and tribal members connected.	Grassroots advocates and local experts
Low-Income	Some Minnesota cities offer city-wide public wifi.	Achieving quality-of-life goals
Low-Income	Public libraries in every Minnesota county provide free wifi and computer access	Public libraries as strong partners
Low-Income	ACP and the Lifeline Program reduce monthly internet costs for low-income households.	Federal funds
Low-Income	Some Minnesota-based organizations provide low-cost refurbished computers.	Programs bolstering device access
Low-Income	Staff at Minnesota's 24 Community Action Partnership (CAP) agencies alleviate poverty through access to resources and services.	Existing state policy, funds, and networks
Low-Income	Federal grants are boosting organizations doing ACP outreach	Grassroots advocates and local experts

Appendix H | Labeled List of Unsupported Necessities

The following list analyzes all unsupported necessities as articulated in Section 5.0. Each unsupported necessity is categorized and labeled to facilitate a greater understanding of the factors at play. The six labels are as follows:

- **Broadband infrastructure limitations** leave behind homes, businesses, and community anchors.
- **Lack of affordability** is a key factor in limiting broadband and mobile data subscription rates.
- **Lack of internet-enabled devices** that meet the users' needs force people offline.
- **Inadequate digital skills training** results in piecemeal services that are less likely to be accessible, responsive, and trusted.
- **Inadequate cybersecurity support** creates a sense of unease.
- **Limited staff capacity and resources** at many community organizations make it challenging to expand or evolve services.

Population	Unsupported Necessity as Written	Label
Statewide	Broadband access in Minnesota is not yet universal.	Broadband infrastructure limitations
Statewide	Household computer ownership is lower than household smartphone and tablet ownership.	Lack of internet-enabled devices
Statewide	Minnesota ranks last out of all states for its poor support for computer science curriculum in high schools.	Inadequate digital skills training
Statewide	Telehealth is a valuable but underutilized resource in communities of all types.	Inadequate digital skills training
Statewide	One-on-one technology assistance through community-based organizations is becoming more common, but funding is piecemeal overall.	Limited staff capacity and resources
Statewide	Minnesota Department of Education no longer includes digital equity as one of its priorities for federal Library Services and Technology Act (LSTA) funding.	Limited staff capacity and resources

Population	Unsupported Necessity as Written	Label
Statewide	Cyberbullying among Minnesota's students is persistent.	Inadequate digital skills training
Rural	Greater Minnesota residents are less likely to have a broadband subscription.	Limited broadband infrastructure
Rural	Greater Minnesota households are also more likely to have only a mobile data plan than Metro households.	Lack of affordability
Rural	Rural residents frequently cite challenges with slow internet speeds and unreliable service.	Broadband infrastructure limitations
Rural	Satellite and fixed wireless internet service can be made less reliable by weather fluctuations.	Broadband infrastructure limitations
Rural	A lower proportion of Greater Minnesota residents have enrolled in ACP.	Limited staff capacity and resources
Rural	Households in Greater Minnesota are less likely to have a laptop or desktop computer at home.	Lack of internet-enabled devices
Rural	Residents of Greater Minnesota need to travel farther to use a public library and have fewer library open hours available.	Limited staff capacity and resources
Rural	Rural residents are using telehealth services at a lower rate than urban residents.	Inadequate digital skills training
Rural	Greater Minnesota public libraries have significantly fewer staff than their Metro counterparts.	Limited staff capacity and resources
Modern Elders	Adults ages 60-plus adopt broadband at lower rates than adults under age 60.	Limited staff capacity and resources
Modern Elders	ACP enrollment rates are lowest among adults ages 65-plus.	Limited staff capacity and resources
Modern Elders	Broadband access in senior living and assisted care facilities is far from universal.	Broadband infrastructure limitations

Population	Unsupported Necessity as Written	Label
Modern Elders	Modern elders are left behind adults ages 18–59 in rates of laptop and desktop computer ownership.	Lack of internet-enabled devices
Modern Elders	Adults ages 60 and greater may also face barriers related to using outdated technology.	Lack of internet-enabled devices
Modern Elders	Smartphone use is low among modern elders.	Lack of internet-enabled devices
Modern Elders	Some modern elders report they do not know where to go for technology assistance or do not have the means to travel there.	Limited staff capacity and resources
Modern Elders	Adults ages 60-plus may be left to navigate the telehealth learning curve on their own.	Limited staff capacity and resources
Minoritized Races	Broadband subscriptions are less frequent among most people from minoritized racial and ethnic groups.	Lack of affordability
Minoritized Races	People from minoritized racial and ethnic groups are more often limited to mobile data only with no home broadband subscription.	Lack of internet-enabled devices
Minoritized Races	People from minoritized racial and ethnic groups are more likely to lose internet service for days at a time.	Lack of affordability
Minoritized Races	Rates of laptop and desktop computer ownership are lower for most people from minoritized racial and ethnic groups.	Lack of internet-enabled devices
Minoritized Races	People from minoritized racial and ethnic groups are more often limited to only a smartphone.	Lack of internet-enabled devices
Minoritized Races	Small businesses owned by people from minoritized racial and ethnic groups also experience these technology disparities.	Limited staff capacity and resources
Minoritized Races	Educators in Minnesota are overwhelmingly White.	Limited staff capacity and resources

Population	Unsupported Necessity as Written	Label
Minoritized Races	City and county government employees in administrative positions are less likely to be from minoritized racial and ethnic groups.	Limited staff capacity and resources
Veterans	Veterans own smartphones and laptops or desktops at lower rates than non-veterans.	Lack of internet-enabled devices
Veterans	While online applications for benefits streamline the process for many veterans, those lacking a device, reliable internet access, or digital skills are left behind.	Inadequate digital skills training
Veterans	The VA's expanded telehealth services and electronic medical records require specific digital skills.	Inadequate digital skills training
Veterans	Veterans returning from service may need upskilling or reskilling to find careers.	Inadequate digital skills training
Veterans	Veterans are more likely to need trauma-informed customer service.	Limited staff capacity and resources
Veterans	Veterans may feel misunderstood by healthcare workers and other service providers, especially in Greater Minnesota.	Limited staff capacity and resources
People with Disabilities	People with disabilities are less likely to have a broadband subscription.	Lack of affordability
People with Disabilities	Remote work options can give people with disabilities the flexibility they need to lead fulfilling careers, but only if they have adequate broadband at home.	Broadband infrastructure limitations
People with Disabilities	People with disabilities are less likely to have access to computers and smartphones.	Lack of internet-enabled devices
People with Disabilities	People with two or more disabilities experience even greater rates of digital exclusion.	Limited staff capacity and resources

Population	Unsupported Necessity as Written	Label
People with Disabilities	Government website compliance with accessibility standards is lacking.	Inadequate cybersecurity support
People with Disabilities	Public libraries, especially those in Greater Minnesota, may not be fully accessible or have assistive technologies available to patrons.	Limited staff capacity and resources
People with Disabilities	Organizations serving people with disabilities often cite short-staffing as significant limiter in their work.	Limited staff capacity and resources
Incarcerated People	Fewer re-entering individuals have access to home internet compared with the general population.	Lack of affordability
Incarcerated People	Re-entering individuals are less likely to have access to an internet-enabled device.	Lack of internet-enables devices
Incarcerated People	After time away from technology, incarcerated and re-entering individuals are more likely to have limited digital skills.	Inadequate digital skills training
Incarcerated People	Imperfect content filtering software sometimes blocks access to important information.	Inadequate cybersecurity support
Incarcerated People	Student to teacher ratios in MCEC ABE learning classrooms are imbalanced.	Limited staff capacity and resources
Language Barriers	People with limited English fluency and/or limited English literacy have a broadband subscription at levels lower than average.	Lack of affordability
Language Barriers	People with limited English fluency and/or limited English literacy are less likely to have a computer at home.	Lack of internet-enabled devices
Language Barriers	Technology classes focused on internet safety are in demand among adults with limited English fluency.	Limited staff capacity and resources
Language Barriers	Online privacy and safety are major concerns among immigrants with limited English fluency.	Inadequate cybersecurity support

Population	Unsupported Necessity as Written	Label
Language Barriers	Parents who are unfamiliar with technology due to language barriers express major concerns regarding their children's safe use of technology.	Inadequate cybersecurity support
Language Barriers	Internet service providers may not be prepared to provide customer service in a language not widely spoken in the U.S.	Limited staff capacity and resources
Language Barriers	In households where the primary language is not English, it is common for children to take on responsibilities assisting their parents with technology.	Inadequate cybersecurity support
Low-Income	People in low-income households are less likely to subscribe to broadband.	Lack of affordability
Low-Income	Households that cannot afford a contracted broadband subscription might use mobile data instead.	Lack of affordability
Low-Income	Low credit scores can limit which internet service providers and plans people can choose.	Lack of affordability
Low-Income	Missed internet service bills in the past can hinder future service.	Lack of affordability
Low-Income	ACP and Lifeline enrollment rates in Minnesota are below the national averages.	Lack of affordability
Low-Income	People in low-income households are more likely to own only a smartphone.	Limited staff capacity and resources
Low-Income	Owners of multi-dwelling units and owners of private manufactured home parks hold significant power over their tenants' and residents' choices for internet providers.	Lack of affordability

Appendix I | Labeled List of Systemic Challenges

The following list analyzes all systemic challenges as articulated in Section 5.0. Each challenge is categorized and labeled to facilitate a greater understanding of the harmful systems that hinder digital opportunity progress. The six challenge labels are as follows:

- Certain challenges are **given** and cannot be altered within the scope of this work.
- **Inequitable resource distribution** across local governments, tribal governments, and community-based organizations perpetuates systemic cycles of community poverty.
- **Limitations in state policy** must expand to affirm the value of digital opportunity initiatives.
- **Inequitable distribution of personal wealth** leads to the inequitable distribution of digital opportunities.
- **Infrastructure inequities** compound on other systemic challenges.
- **Digital skills training requires trust**, respect, accessibility, patience, care, strategy, persistence and creativity. Human connections are essential.

Population	Systemic Challenge as Written	Label
Statewide	Winter is a beast.	Given
Statewide	Some communities report difficulties with the Border-to-Border Broadband Development Grant Program.	Limitations in state policy
Statewide	Some communities report feeling held back by the state's broadband speed goals.	Limitations in state policy
Statewide	Fluctuating state funds for the Border-to-Border Broadband Development Grant Program can create uncertainty among un– and underserved communities.	Inequitable resource distribution
Statewide	Minnesota lacks statutory definitions for terms like "digital inclusion" and "digital opportunity."	Limitations in state policy
Statewide	Concepts relevant to digital opportunity are scattered throughout statute and session laws.	Limitations in state policy
Statewide	Minnesota statute lacks a mechanism to offset internet and device costs for low-income households.	Limitations in state policy

Population	Systemic Challenge as Written	Label
Statewide	Adequate state support for digital opportunity is unlikely to be sustainable without statutory changes.	Limitations in state policy
Rural	Greater Minnesota is more often un- or underserved by broadband compared to the Metro.	Infrastructure inequities
Rural	Limited competition among rural internet service providers reduces consumers' options.	Infrastructure inequities
Rural	Computer and device repair services can be difficult to come by in rural areas.	Inequitable resource distribution
Rural	Financial wealth accumulates in the Metro.	Given
Rural	The dominant narrative about Greater Minnesota sometimes leans into false stereotypes about rural life.	Given
Modern Elders	Modern elders frequently cite cybersecurity concerns as their reason for avoiding technology.	Digital skills training requires trust
Modern Elders	Modern elders on fixed incomes may struggle to budget for technology access.	Inequitable distribution of personal wealth
Modern Elders	Services for modern elders are sometimes designed without guidance from modern elders.	Digital skills training requires trust
Modern Elders	The dominant narrative on aging perpetuates harmful stereotypes about modern elders while reducing their perceived agency.	Given
Minoritized Races	People from minoritized racial and ethnic groups are more likely to experience poverty.	Inequitable distribution of personal wealth
Minoritized Races	Disparities in credit access and credit scores follow racial lines.	Inequitable distribution of personal wealth
Minoritized Races	Financial precarity contributes to housing instability.	Inequitable distribution of personal wealth

Population	Systemic Challenge as Written	Label
Minoritized Races	Owners of multi-dwelling units hold significant power over their tenants' and residents' choices for internet providers.	Infrastructure inequities
Veterans	Veterans on fixed incomes may struggle to budget for technology access.	Inequitable distribution of personal wealth
Veterans	Military service leaves invisible wounds that are not always met with care, patience, and respect.	Given
People with Disabilities	Accessible design is sometimes framed as an option rather than the necessity it is.	Inequitable resource distribution
People with Disabilities	People with disabilities are more likely to be on fixed incomes and/or experiencing poverty.	Inequitable distribution of personal wealth
People with Disabilities	For people with disabilities who work, lower median earnings make it challenging to afford costs for assistive technologies and internet service.	Inequitable distribution of personal wealth
People with Disabilities	Adults with disabilities may be unable to work full-time.	Inequitable distribution of personal wealth
Incarcerated People	Poverty disproportionately affects people who have been incarcerated and their families who may have been dependent on their income prior to incarceration.	Inequitable distribution of personal wealth
Incarcerated People	People who are incarcerated often have lower levels of educational attainment.	Inequitable distribution of personal wealth
Incarcerated People	Rates of unemployment are high among formerly incarcerated people.	Inequitable distribution of personal wealth
Incarcerated People	Imprisonment is dehumanizing and traumatic.	Given
Language Barriers	Minnesota residents born outside the U.S. are more likely to live below 150% of the poverty level.	Inequitable distribution of personal wealth
Language Barriers	Jargon is still jargon after it's translated.	Digital skills training requires trust

Population	Systemic Challenge as Written	Label
Language Barriers	Limited English fluency and literacy are significant vulnerabilities.	Digital skills training requires trust
Language Barriers	People new to the U.S. might be coming from a country where technology was restricted or unavailable.	Digital skills training requires trust
Language Barriers	People living with language barriers—especially parents whose tech-savvy children are online—are on high alert for scams and worry about online safety.	Digital skills training requires trust
Low-Income	Low-income households experience challenging income-to-broadband cost ratios.	Inequitable distribution of personal wealth
Low-Income	The future of ACP is unknown.	Given
Low-Income	Income– and cost-associated housing issues plus digital inequity plus employment challenges compound on one another in a dangerous cycle.	Inequitable distribution of personal wealth
Low-Income	People experiencing homelessness face the steepest systemic challenges to breaking this cycle.	Inequitable distribution of personal wealth
Low-Income	Residents of apartment buildings and other multi-dwelling units may experience technology challenges related to income and building ownership.	Infrastructure inequities
Low-Income	Residents of manufactured home parks experience similar issues as apartment residents.	Infrastructure inequities
Low-Income	“Affordability” depends on context.	Given

Appendix J | Crosswalk: Strengths, Necessities, Challenges, Populations, and Activities

The following table crosswalks activities from the implementation plan with every label discerned while analyzing the existing strengths, unsupported necessities, and systemic challenges across and among covered populations.

Each row can be understood as follows:

> [This activity] supports [these populations] while honoring [strength], alleviating [unsupported necessity], and confronting [challenge].

Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
3.1.1.A.a	Pilot a Digital Opportunity Leaders Network	All	Grassroots advocates and local experts	Limited staff capacity and resources	Inequitable resource distribution
3.1.1.A.b	Convene an inter-agency digital opportunity workgroup	All	Existing state policy, funds, and networks	Limited staff capacity and resources	Limitations in state policy
3.1.1.A.c	Expand DCC model of engagement	All	Grassroots advocates and local experts	Limited staff capacity and resources	Inequitable resource distribution
3.1.1.A.d	Retain DCCs	All	Existing state policy, funds, and networks	Limited staff capacity and resources	Inequitable resource distribution
3.1.1.B.a	Administer digital navigator grants to covered population orgs	All	Digital navigator roles	Inadequate digital skills training	Digital skills training requires trust
3.1.1.B.b	Administer grants to orgs serving	All	Digital skills	Lack of affordability	Digital skills training requires trust

Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
	covered populations		Public libraries as strong partners Achieving quality-of-life goals Programs to bolster device access	Inadequate digital skills training Lack of internet-enabled devices	Inequitable distribution of personal wealth
3.1.1.B.c	Research models for tech helpline	All, esp. Modern Elders	Existing state policy, funds, and networks	Inadequate digital skills training Inadequate cybersecurity support	Inequitable distribution of personal wealth
3.1.1.C.a	Support high schoolers in developing tech repair and tech assistance skills	All, esp. Rural	Digital navigator roles	Lack of affordability	Inequitable resource distribution Digital skills training requires trust
3.1.1.C.b	Administer grants for tech assessment for small businesses	All, esp. Rural, Minoritized Races	Achieving quality-of-life goals	Limited staff capacity and resources Broadband infrastructure limitations	Inequitable resource distribution Infrastructure inequities
3.2.1.A.a	Enhance staff capacity at OBD for data analysis	All	Existing state policy, funding, and network	Limited staff capacity and resources	Limitations in state policy

Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
3.2.1.A.b	Enhance maps at OBD	All	Existing state policy, funding, and network	Limited staff capacity and resources	Limitations in state policy
3.2.1.A.c	Enhance data collection at OBD	All	Existing state policy, funding, and networks	Limited staff capacity and resources	Limitations in state policy
3.2.1.A.d	Develop an OBD digital opportunity directory	All	Grassroots advocates and local experts	Limited staff capacity and resources	Digital skills training requires trust
3.2.1.B.a	Administer planning grants to municipalities, tribes	All	Achieving quality-of-life goals	Limited staff capacity and resources	Inequitable resource distribution
3.2.1.B.b	Administer data collection grants to municipalities, tribes	All	Achieving quality-of-life goals	Limited staff capacity and resources	Inequitable resource distribution
3.2.1.B.c	Lead a training series for municipalities, tribes	All, esp. Rural	Grassroots advocates and local experts	Limited staff capacity and resources	Inequitable resource distribution
3.2.1.C.a	Administer web accessibility assessment grants for municipalities, tribes	Disabilities, Language Barriers	Achieving quality-of-life goals	Limited staff capacity and resources	Inequitable resource distribution Inequitable distribution of personal wealth
3.2.1.C.b	Administer web accessibility re-design grants for	Disabilities, Language Barriers	Achieving quality-of-life goals	Limited staff capacity and resources	Inequitable resource distribution

Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
	municipalities, tribes				Inequitable distribution of personal wealth
3.2.1.C.c	Administer grants for PEG channels to enhance digital services	All, esp. Rural, Modern Elders, Disabilities	Grassroots advocates and local experts	Broadband infrastructure limitations	Infrastructure inequities
3.3.1.A.a	Enhance staff capacity for OBD ACP outreach	All, esp. Low-Income	Federal funds Achieving quality-of-life goals	Lack of affordability	Inequitable distribution of personal wealth
3.3.1.A.b	Foster housing partnerships	All, esp. Low-Income, Minoritized Races	Achieving quality-of-life goals	Broadband infrastructure limitations	Infrastructure inequities
3.3.1.A.c	Research models for state internet discount program like ACP	All, esp. Low-Income	Federal funds Achieving quality-of-life goals	Lack of affordability	Inequitable distribution of personal wealth
3.3.1.B.a	Research models for state device discount program	All, esp. Low-Income	Federal funds Programs to bolster device access	Lack of internet-enabled devices	Inequitable distribution of personal wealth
3.3.1.B.b	Research model for long-term device loans	All, esp. Low-Income	Programs to bolster device access Existing state policy, funding, and networks	Lack of internet-enabled devices	Inequitable distribution of personal wealth

Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
3.3.1.C.a	Enhance re-entry supports for tech access	Incarcerated	Achieving quality-of-life goals	Lack of affordability Inadequate digital skills training	Inequitable distribution of personal wealth
3.3.1.C.b	Improve resources for refugees and immigrants	Minoritized Races, Language Barriers	Achieving quality-of-life goals	Limited staff capacity and resources	Digital skills training requires trust
3.3.1.C.c	Develop expanded tech services with CareerForce	All	Achieving quality-of-life goals	Inadequate digital skills training Inadequate cybersecurity support	Digital skills training requires trust
3.3.1.C.d	Administer competitive grants for orgs serving covered populations	All	All	All	All

Appendix K | Crosswalk: MN Plan vs. NOFO

The following table crosswalks the statutory and additional requirements outlined in the State Digital Equity Planning Grant NOFO with Minnesota's plan as presented.

MN Plan Section	NOFO Requirement	Description
5.2.3 5.3.3 5.4.3 5.5.3 5.6.3 5.7.3 5.8.3 5.9.3 Appendix I	IV.C.1.b.i.1	Identification of barriers to digital equity faced by Covered Populations in the State.
1.1.3 3.1.2 3.2.2 3.3.2 3.4 Appendix C Appendix D	IV.C.1.b.i.2	Measurable objectives for documenting and promoting, among each Covered Population located in that State— a. The availability of, and affordability of access to, fixed and wireless broadband technology; b. The online accessibility and inclusivity of public resources and services; c. Digital literacy; d. Awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and e. The availability and affordability of consumer devices and technical support for those devices.
6.2.1	IV.C.1.b.i.3	An assessment of how the measurable objectives identified in item 2 of this Section IV.C.1.b.i will impact and interact with the State's— a. Economic and workforce development goals, plans, and outcomes; b. Educational outcomes; c. Health outcomes; d. Civic and social engagement; and e. Delivery of other essential services.
6.1.1 6.1.2 6.1.3 6.2.2	IV.C.1.b.i.4	In order to achieve the measurable objectives identified in item 2 of this Section IV.C.1.b.i, a description of how the State plans to collaborate with key stakeholders in the State.

MN Plan Section	NOFO Requirement	Description
6.2.2 Appendix A Appendix B	IV.C.1.b.i.5	A list of organizations with which the Administering Entity for the State collaborated in developing the Plan.
1.1.1	IV.C.1.b.ii.1	A stated vision for digital equity.
5.1.2 5.2.2 5.3.2 5.4.2 5.5.2 5.6.2 5.7.2 5.8.2 5.9.2 Appendix C Appendix D Appendix G Appendix I	IV.C.1.b.ii.2	A digital equity needs assessment, including a comprehensive assessment of the baseline from which the State is working and the State's identification of the barriers to digital equity faced generally and by each of the covered populations in the State.
5.1.1 5.2.1 5.3.1 5.4.1 5.5.1 5.6.1 5.7.1 5.8.1 5.9.1 6.2.3 Appendix E Appendix G	IV.C.1.b.ii.3	An asset inventory, including current resources, programs, and strategies that promote digital equity for each of the covered populations, whether publicly or privately funded, as well as existing digital equity plans and programs already in place among municipal, regional, and Tribal governments.
6.1.1 6.1.2 6.1.3 6.2.2	IV.C.1.b.ii.4	To the extent not addressed in connection with item 4 of Section IV.C.1.b.i, a coordination and outreach strategy, including opportunities for public comment by, collaboration with, and ongoing engagement with representatives of each category of covered populations within the State and with the full range of stakeholders within the State.

MN Plan Section	NOFO Requirement	Description
6.2.2 Appendix E	IV.C.1.b.ii.5	A description of how municipal, regional, and/or Tribal digital equity plans will be incorporated into the State Digital Equity Plan.
3.1 3.2 3.3 3.4 6.1 6.2.2 Appendix C Appendix D Appendix G Appendix I	IV.C.1.b.ii.6	An implementation strategy that is holistic and addresses the barriers to participation in the digital world, including affordability, devices, digital skills, technical support, and digital navigation. The strategy should (a) establish measurable goals, objectives, and proposed core activities to address the needs of covered populations, (b) set out measures ensuring the plan's sustainability and effectiveness across State communities, and (c) adopt mechanisms to ensure that the plan is regularly evaluated and updated.
3.1 3.2 3.3 Appendix I	IV.C.1.b.ii.7	An explanation of how the implementation strategy addresses gaps in existing state, local, and private efforts to address the barriers identified pursuant to Section IV.C.1.b.i, item 1, of this NOFO.
6.1.1 6.1.2 6.1.3	IV.C.1.b.ii.8	A description of how the State intends to accomplish the implementation strategy described above by engaging or partnering with: a. Workforce agencies such as state workforce agencies and state/local workforce boards and workforce organizations; b. Labor organizations and community-based organizations; and c. Institutions of higher learning, including but not limited to four-year colleges and universities, community colleges, education and training providers, and educational service agencies.
4.1 4.2 6.1.1 6.1.2 6.1.3	IV.C.1.b.ii.9	A timeline for implementation of the plan.
6.3	IV.C.1.b.ii.10	A description of how the State will coordinate its use of State Digital Equity Capacity Grant funding and its use of any funds it receives in connection with the Broadband Equity, Access, and Deployment Program, other federal or private digital equity funding.

Appendix L | OBD's Revisions in Response to NTIA's Recommendations

Requirement as Named by NTIA	NTIA Recommendation[257]	OBD's Revisions and Responses
Statutory Requirement 1	It is possible other intersections could be identified and explored.	Yes, it is possible. OBD anticipates delving more into this once the State Digital Equity Capacity grants become available.
Statutory Requirement 2	At least one measurable objective must be included for all 8 covered populations located in the state for all sub-items.	The following sections were added: 1.1.3, 3.1.2, 3.2.2, 3.3.2, 3.4. Appendix C and D were revised. Explanatory components were incorporated in the introduction to Section 3.0.
Statutory Requirement 3	The state-wide goals that were identified should connect more directly with the measurable objectives that are used for each covered population.	Sections 3.1.2, 3.2.2, and 3.3.2 were revised. This is also clarified in revisions made in Appendix C and Appendix D.
Statutory Requirement 4	The DCCs are identified, as are the hosts, but the makeup of the DCCs is not described. Engagement otherwise appears to be focused primarily on state government agencies.	This cannot be provided. To ensure privacy and foster trust, OBD did not track individual DCC composition or makeup. This was intentional from the project's onset. Appendix B has been expanded to include all organizations and agencies with which OBD met in some planning capacity.
Statutory Requirement 5	Elaborate on the other organizations that make up the DCCs.	This cannot be provided.

[257] Text in this column is excerpted from the recommendations NTIA emailed to OBD on the final day of the public comment period.

Requirement as Named by NTIA	NTIA Recommendation[257]	OBD's Revisions and Responses
	Identify which covered populations each organization or entity represents and/or serves. If the organizations represented by the DCCs are too numerous, descriptions and in particular, examples, should be included.	DCCs provided this information on a voluntary basis when registering with OBD. Their responses when available have been integrated into Appendix A. Every DCC submitting data to OBD is cited throughout the plan. Along with the revisions to Appendix A, these citations that include direct quotations, statistics, and other quantitative and qualitative measures should be sufficient as examples of the breadth and depth of coverage the DCCs represent.
Programmatic Requirement 6	The vision needs to define digital equity within the context of the state. It is also recommended that the vision be time-bound.	Light revisions were made to the vision statement.
Programmatic Requirement 7	The elements related to the baselines are very solid, but their relation to the measurable objectives needs to be aligned.	This is clarified through revisions to Sections 3.1.2, 3.2.2, and 3.3.2. This is also clarified in Appendix C and Appendix D.
Programmatic Requirement 8	The state is encouraged to expand on these strengths, as the basic program requirements call for "a full and accurate listing" of all assets.	OBD supplemented "asset" with "existing strengths" to account for intrinsic value, including the value of people coming together to solve systemic problems. The existing strengths listed throughout Section 5.0 of this plan have been consolidated in Appendix G.
	The plan also needs to identify DE plans and programs among municipal, regional, and tribal governments. The plans were included, but further elaboration on the programs carried out	This is clarified in content added to Section 6.2.3 and in modifications made to Appendix E.

Requirement as Named by NTIA	NTIA Recommendation[257]	OBD's Revisions and Responses
	by these entities is encouraged, if applicable.	
Programmatic Requirement 9	The plan does not include a coordination and outreach strategy that covers public comment, collaboration, and ongoing engagement to the extent required by the NOFO.	Sections 6.1.1 and 6.1.2 were expanded to clarify timelines, incorporate public comment options, and directly address covered populations.
Programmatic Requirement 10	The element that is missing is how [other state agency plans] will be incorporated into the DE plan.	The table in Section 6.2.1 was expanded to list relevant activities aligned with each plan.
Programmatic Requirement 11	The measurable objectives are included in the plan, though not entirely connected to the core activities in implementation. It is recommended to be more explicit about measures to ensure plan sustainability and mechanisms for updating and evaluating the plan.	This is clarified through revisions to Sections 3.1.2, 3.2.2, and 3.3.2 and through the addition of Section 3.4. Alignment charts were added in Appendices G, H, I, and J. Annual calendars were added to Sections 6.1.1, 6.1.2, and 6.1.3. Clarifications were made regarding workgroup composition in 6.1.2.
Programmatic Requirement 12	There appear to be few explicit mentions of how the implementation strategy will address the gaps in state, local, and private efforts to address the barriers to DE faced by the covered populations.	This was added in Appendix J.
Programmatic Requirement 13	Explore further the elements required in this requirement, such as explicitly describing how the workforce entities, labor organizations and CBOs, and institutions of higher learning will be engaged and partnered with to accomplish implementation.	This information was incorporated into Sections 6.1.1 and 6.1.2.

Requirement as Named by NTIA	NTIA Recommendation[257]	OBD's Revisions and Responses
Programmatic Requirement 14	It is recommended to examine the model plan guidance as it relates to this section, particularly the requirement to demonstrate a realistic, actionable, and measurable implementation timeline. It is also recommended to look at the timelines developed in other states' plans, though only for inspiration on how they are using visualizations.	OBD finds it is not possible to create a wholly realistic, actionable, or measurable timeline in the absence of a known start date for the State Digital Equity Capacity Grant program. To make good use of resources, OBD will work with DEED's in-house graphic designers once NTIA has approved final plan content.
Programmatic Requirement 15	There is natural collaboration that is expected, as BEAD and DE are both operated out of the same office in Minnesota, but further description on how the coordination will be done is necessary. In addition, coordination with other federal and private funding (if applicable) is required in this section.	Additional details were added to Section 6.3. OBD has no additional state, federal, or private funding at its disposal for digital opportunity work at this time.
Programmatic Requirement 16	Incorporate public comments into future versions of the plan.	This was added to Section 2.2.

Appendix M | Definitions

ACP: *see* Affordable Connectivity Program

Affordable Connectivity Program: a program overseen by the Federal Communications Commission providing internet services discounts of $30/month (or $75/month for households in Native Nations) for households meeting certain low-income requirements

Aging individual: *see* modern elder

Broadband: "high-speed internet access that is always on and faster than traditional dial-up access. Broadband includes several high-speed transmission technologies, such as fiber, wireless, satellite, digital subscriber line and cable. For the Federal Communications Commission (FCC), broadband capability requires consumers to have access to actual download speeds of at least 25 Mbps and actual upload speeds of at least 3 Mbps" (NTIA)

Covered household: "a household, the income of which for the most recently completed year is not more than 150 percent of an amount equal to the poverty level, as determined by using criteria of poverty established by the Bureau of the Census" (NOFO)

Cybersecurity: "the art of protecting networks, devices, and data from unauthorized access or criminal use and the practice of ensuring confidentiality, integrity, and availability of information" (CISA)

Device: a computing object that can send, receive, store, and process information; this includes but not limited to desktop computers, laptop computers, tablets, and smartphones

Digital equity: "the condition in which individuals and communities have the information technology capacity that is needed for full participation in the society and economy of the United States" (NOFO)

Digital Equity Act: a federal act that "provides $2.75 billion to establish three grant programs that promote digital equity and inclusion. They aim to ensure that all people and communities have the skills, technology, and capacity needed to reap the full benefits of our digital economy" (NOFO)

Digital inclusion: "the activities that are necessary to ensure that all individuals in the United States have access to, and the use of, affordable information and communication technologies, such as—

a. Reliable fixed and wireless broadband internet service;
b. Internet-enabled devices that meet the needs of the user; and
c. Applications and online content designed to enable and encourage self-sufficiency, participation, and collaboration; and

2. Includes—

a. Obtaining access to digital literacy training;
b. The provision of quality technical support; and
c. Obtaining basic awareness of measures to ensure online privacy and cybersecurity" (NOFO)

Digital literacy: “the skills associated with using technology to enable users to find, evaluate, organize, create, and communicate information” (NOFO)

Digital opportunity: *see* digital equity

Digital skills: *see* digital literacy

Disability: “with respect to an individual, 1. a physical or mental impairment that substantially limits one or more major life activities of such individual; 2. a record of such an impairment; or 3. being regarded as having such an impairment” (NOFO)

English fluency: the degree to which an individual can use the English language to create something that communicates meaning, such as a sentence, a paragraph, a poem, or a story

English literacy: the degree to which an individual can comprehend and make meaning out of the written English language

Fixed wireless internet service: a type of broadband internet service that uses radio waves to transmit a signal from a designated tower to a designated receiver antenna that’s been installed in a fixed location

Language barrier: a communication challenge arising out of limitations in English fluency and/or English literacy

Mobile internet service: a type of internet service that uses radio waves to transit a signal from an available tower to a designated mobile device, like a smartphone or a hotspot

Modern elder: “an individual who is 60 years of age or older” (NOFO)

Public library: “any library that provides free access to all residents of a city or county without discrimination, receives at least half of its financial support from public funds” (Minn. Stat. § 134.001)

Regional public library system: “a multicounty public library service agency that provides free access to all residents of the region without discrimination” (Minn. Stat. § 134.001)

Rural area: “any area other than: (1) a city or town that has a population of greater than 50,000 inhabitants; (2) any urbanized area contiguous and adjacent to a city or town that has a population of greater than 50,000 inhabitants; and (3) in the case of a grant or direct loan, a city, town, or incorporated area that has a population of greater than 20,000 inhabitants” (NOFO)

Veteran: “a person who served in the active military, naval, air, or space service, and who was discharged or released therefrom under conditions other than dishonorable” (NOFO)

Wireless internet service: *see* fixed wireless internet service

Wireline internet service: internet service provided via a physical line, like copper or fiber optic cabling, that connects the internet provider’s network directly to the premise of a home or business

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Appendix O | Written Comments: Overview

Written public comments on the draft plan were accepted via mail and through an online form from Monday, August 21 to Friday, September 29, 2023. In this span of time, 66 comments were received from the following entities:

- 32 self-represented individuals
- AARP
- Ameelio
- American Public Media Group
- Arrowhead Economic Opportunity Agency
- Benton Foundation
- Beyond Media Solutions
- Blandin Foundation
- Carlton-Cook-Lake-St. Louis County Community Health Board
- Carver County
- City of Columbia Heights (prepared and submitted by Bradley Werner Attorneys at Law)
- City of Coon Rapids (prepared and submitted by Bradley Werner Attorneys at Law)
- City of Duluth
- City of Minneapolis (prepared and submitted by Bradley Werner Attorneys at Law)
- City of Saint Louis Park
- City of Saint Paul
- Comcast
- Compudopt
- Consolidated Telephone Company (CTC)
- Digitunity
- EducationSuperHighway
- Gifts for Seniors
- Hennepin County
- Hennepin County and Ramsey County (joint submission)
- Hennepin County Library
- Kandiyohi County
- League of Minnesota Cities
- Legacy Adult Daycare Center
- Literacy Minnesota (2 different submissions received)
- Mid-Minnesota Regional Development Commission
- Minnesota Department of Education
- Minnesota Department of Human Services
- North Metro Telecommunications Commission (prepared and submitted by Bradley Werner Attorneys at Law)

- North Suburban Communications Commission (prepared and submitted by Bradley Werner Attorneys at Law)
- Northwest Suburbs Cable Communications Commission (prepared and submitted by Bradley Werner Attorneys at Law)
- Ramsey County
- South Washington County Telecommunications Commission (prepared and submitted by Bradley Werner Attorneys at Law)
- Urban Strategies, Inc.
- Windstream

Appendix P | Written Comments: Full Text

Public comments received in writing are presented in this section. Redactions to names and email addresses have been made as needed to protect the privacy of self-represented individuals.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #1]
Email	[removed]
Zipcode	56011
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	2: Planning Process: The Minnesota Model
Comment regarding the Digital Opportunity Plan	Although I have access to Broadband connectivity it is shared so evenings of after 3 pm or before 8:00 am you are unable to get reliable internet service. In addition my zip code does reflect a "city" connection where a variety of plans and vendors offer service. However, outside of the city limits, this is not the case. Maybe we get one vendor and limited connectivity less than 25mbps at a high rate that again is shared. Even mobile phone service is not always reliable or not available by popular vendors.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Adrianne Furniss
Email	afurniss@benton.org
Zipcode	60091
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	1: Introduction

Comment regarding the Digital Opportunity Plan

One key requirement of state digital equity plans is that they include a state's vision of digital equity. The National Telecommunications and Information Administration (NTIA) suggests that digital equity visions address at least these two questions:
1. What will digital equity look like in the context of your state?
2. What are the broad goals that should be accomplished in executing this plan (e.g., improve rural health outcomes, increase underrepresented youth employment in technology-related fields)?

NTIA has specifically advised states to "lead with equity," intentionally identifying, amplifying, and centering the voices of those most affected by the digital divide and disconnected communities.

With the extraordinary task and responsibility of state policymakers and local communities in mind, the Benton Institute for Broadband & Society launched the Visions of Digital Equity project to aid both in ensuring that more community voices are heard in crafting visions that increase opportunity for all.

Through surveys, community meetings, interviews, conversations, and a collaborative writing process with community contributors, we have arrived at a set of principles to help guide both the process and the resulting visions of digital equity.

We learned that a well-crafted vision of digital equity has the potential to be very powerful. It can:
• Offer a glimpse of a state transformed by universal connectivity,
• Provide a roadmap and resources for the digital inclusion efforts to come, and
• Act as a north star for goal setting, planning, and implementation efforts over the months and years to come.

The best visions of digital equity will be community centered and focused on creating change, specific and clearly articulated, and ambitious but attainable.

The Benton Institute for Broadband & Society reviewed Minnesota's DRAFT Digital Opportunity Plan and shared a summary of it with our readers (see https://www.benton.org/blog/what-digitally-equitable-minnesota-could-look-and-how-get-there)

Upon review, we offer 10 Principles for Digital Equity Visions (see https://www.benton.org/sites/default/files/VisionsDigitalEquity.pdf). We hope these principles help the people of Minnesota evaluate both the DRAFT Digital Opportunity Plan and the Office of Broadband Development's revision of the plan. To that end, we also offer A Checklist for Evaluating Digital Equity Visions: https://www.benton.org/sites/default/files/DEV_checklist.pdf

Thank you for the opportunity to weigh in on the plan; I would be happy to answer any questions or discuss the potential of Minnesota's vision for digital equity.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Scot Henley
Email	scot@digitunity.org
Zipcode	03860
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan

Congratulations on completing the draft of Minnesota's Digital Equity Plan! As a national nonprofit organization focused on the device ownership aspect of digital equity, we are delighted to see device access as a priority within Minnesota's plan. Everyone who needs a computer should have one.

This is a watershed moment for advancing digital equity. We offer this feedback as a means to share our unique perspective, leveraging nearly 40 years of work on the issue of device ownership, a national lens into how states are approaching the issue, and our role in administering a nationwide practitioner network. We are truly and sincerely vested in your success.

First, we would like to emphasize three overarching points:

Large screen device ownership: Owning a computer is crucial for thriving in the modern economy. Those without a computer are unable to harness the vast opportunities that the internet provides, such as employment, education, telehealth, commerce, finance, communication, and much more. Personal device ownership provides a unique computing experience that cannot be replicated through public use of computers or shared devices and mobile devices limit opportunity. (Please see "The Importance of Large-Screen Device Ownership," November 2021, Amy L. Gonzales, University of California, Santa Barbara, available here). Large screen devices such as laptops, desktops, Chromebooks, and tablets, are critical for a full and equitable computing experience.

Sustainability: While short-term gains are possible, our collective efforts must aim for sustainable solutions that far outlast this five-year federal investment. Building a plan around merely making grants to procure devices would be shortsighted, missing this landmark opportunity to create comprehensive change. Instead, we must develop solutions that transform the way corporate, government, and institutional IT assets are managed at scale. Repurposing previously used technology for community support can make computer ownership more accessible. Technology reuse is a practical and environmentally friendly solution for expanding device ownership.

Device quality and intended use: Affordable devices must be reliable; quantity cannot replace quality. It is also critical that the choice of device matches a recipient's intended use and context. While less expensive devices may be a quick win within a limited budget, a healthy device ecosystem will provide economical solutions that meet the full range of recipients' needs.

Regarding Minnesota's Digital Equity Plan, we offer the following specific feedback and recommendations:

Kudos!: We're happy to see the inclusion of the goal of "increasing the

proportion of people from covered populations with laptop or desktop computers." The plan's recognition of the need for accessible and affordable device repair is also great, as well as the innovation towards potentially developing a state program to offset device costs.

Aim high: Working to ensure that all members of Covered Populations own a large screen device is achievable. The plan has several strong building blocks toward achieving this goal and we encourage the state to continue to strive for device ownership for all who need it.

Ecosystem approach: To ensure that all Minnesotans have the ability to obtain a free or low cost computer, establishing a robust supply of applicable devices through accessible, resilient, community-level distribution systems is critical. Systems thinking is required, with active involvement from a diverse range of actors and stakeholders. Digitunity's Methodology for a Sustainable Device Ecosystem provides a framework for addressing this issue on a large scale. The draft plan identifies several components of a device ecosystem, however, intentional coordination and a holistic approach should be planned for in order to realize maximum impact, leverage additional resources, and reduce duplication.

Local plans: Given that there was no mention of device ownership in most of the local plans, additional probing, analysis, and education is needed with communities to ensure that their needs are represented and the understanding of what a device ecosystem can enable is established. Their increased awareness will surely bring additional expertise, resources, and engagement to device solutions for their communities.

Refurbishing: As noted, Minnesota is home to a number of nonprofit technology refurbishers who are also members of Digitunity's practitioner network, known as the Alliance for Technology Refurbishing and Reuse (AFTRR). Refurbishing is a key component of a device ecosystem and necessitates a strong emphasis on technical skills and expertise, particularly to guarantee the secure handling of data. It also requires working with certified vendors to ensure that e-waste is responsibly handled and that the entire process is financially viable. It's important to note that in December 2022, Digitunity helped to pass the federal Computers for Veterans and Students Act which will soon direct repairable federal computers to nonprofit technology refurbishers across the country. Minnesota could be a beneficiary of this program. It is important to understand the capacity, scalability, and quality of service that each refurbisher provides in the state and to address any gaps or deficiencies. We caution against identifying any single vendor, whether nonprofit or for-profit, as the statewide refurbishing solution. A sustainable device ecosystem leverages a broad range of assets to serve community members best.

Support for device deployment: Deployment is a critical component of a sustainable device ecosystem. This involves a multi-step, multifaceted

process and it is essential that skills training and technical support are tightly integrated in the acquisition of a device. For deployment, we highly recommend that trusted community organizations with specific training and support regarding device deployment be engaged to help residents obtain and use devices. Intentional effort should be placed on developing a deployment network through community-based organizations, with formalized connections made between device sources in populated hubs and rural deployment points.

Connecting supply to deployment: Digitunity has a longstanding online technology donation matching platform that connects the supply of new and refurbished devices to vetted community organizations for deployment. This is a critical and often overlooked part of the overall device ecosystem, and we'd be happy to share more about this with the state.

Technical support: The establishment of school tech repair programs is unique and we look forward to learning more about this work. We are curious as to the reach and capacity of the program and how it integrates into workforce development initiatives and funding. It's also important to note that refurbishers and device suppliers often provide robust technical support services including the provision of device warranties.

Digital Navigators: Digitunity recently sponsored a small scale research project regarding Digital Navigators and their capacity to help their clients acquire/obtain devices. Their effectiveness was largely dependent on the free or low cost device options available locally, as well as their training regarding device options. The study found that several Digital Navigators relied on their own prior knowledge about device procurement and some even advised clients to go to large box retail stores to obtain a device.

Device discount program: We commend the state for looking at alternatives to the Affordable Connectivity Program (ACP), especially since the future of the program is uncertain. The "take rate" for devices in the ACP has been extremely low particularly because many ISP's don't offer devices as part of the program and that is the only way to access the benefit. The devices that are offered through the ACP subsidy are often low grade tablets. Other approaches to offering a device subsidy have stalled in Congress. We would welcome the opportunity to work with the state on the design of a device discount program.

Loaning vs. owning: It is noted in the draft plan the goal to "prepare a report that explores a sustainable state-managed system for circulating large screen devices as long-term loans through collaborating public programs." While loaning programs and providing device access via school or library computer labs could serve as a stop-gap measure, true equity is when residents have full access to the devices that meet their needs. Loaning programs typically require transportation to a location to pick up and return the device, as well as the restricted use of the device. Evidence shows that people who have unlimited access to a device increase their digital literacy

skills more quickly than those with restricted access. We highly recommend a measurable objective based on device ownership, not periodic access to a device.

Public-private partnerships: The role that the business and philanthropic community can play in a device ecosystem is often transformative. They can play key roles in supporting a robust supply of free and low cost devices that can be made available for Covered Populations. We recommend development of a strategy to engage them in this plan.

Evaluation: We strongly recommend that performance indicators should be more robust than simply tracking the number of devices distributed, and could include establishing and monitoring the performance of components within the device ecosystem, as well as the breadth, composition, and resilience of the ecosystem itself.

Leveraging the support of outside entities, such as Digitunity or other national actors engaged in this work, could help speed and inform the implementation process and enhance the capacity investments made in Minnesota's local practitioners, stakeholders, and government departments. We firmly believe that with a shared vision, engagement of non-traditional partnerships, and creative approaches, there are ample resources available to significantly increase device ownership, both now and in the years beyond this federal investment.

We wish you great success in this important endeavor.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #2]
Email	[removed]
Zipcode	55812
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	Handout: Executive summary
Comment regarding the Digital Opportunity Plan	Referring to Indigenous Peoples as "minoritized racial and ethnic groups" is complicated, yeah? Do you have someone indigenous helping you with terminology? Indigenous people (and their relationship with the state) are defined by treaty, unlike other minoritized racial and ethnic groups.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #3]
Email	[removed]
Zipcode	55417
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	1: Introduction
Comment regarding the Digital Opportunity Plan	Laying any physical fiber or cable is going to be a big waste of money for remote and rural areas. That will require ongoing upkeep and maintenance, and will become antiquated very soon. My suggestion is to invest in satellite internet for remote areas, like Starlink or a similar provider, which enables immediate high speed internet for ANY remote area, as far off the grid as needed. The only thing needed is power, which can be provided by solar.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Legacy Adult Daycare Center
Email	swu@hhcare.net
Zipcode	55427
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity

Comment regarding the Digital Opportunity Plan	To whom it may concern, Health Care Plus, Inc. provides adult day services through Heartland Adult daycare and Legacy adult daycare center. We served Chinese, Hispanic/Latinx, Russian, Vietnamese seniors. At this time, we have 467 registered seniors, many are Limited English Proficiency (LEP) members. One of the urgent needs for our seniors is to connect with resources, and supporting them with a healthy living environment. About half of our seniors do not have iPads and are unable to purchase them due to limited incomes. Health Care Plus has been approved by DHS to provide remote services for our clients. The seniors would greatly be benefited by having a device such as an iPad as this would allow them access to online services and aid them with program participation. iPad also gives them the ability to communicate with one another face to face. We are hoping that our seniors can get help with getting iPads so that they can stay connected both in person and remotely. As the Center director for 14 years, I see how technology has changed our ways of connecting, and the COVID pandemic although a crisis for all, but did expand how services can be delivered online. While we continue to emphasize the importance of in-person contacts, and involving seniors in diverse group services, we also see how the technology can improve their lives, with easier and quicker access to services online. We understand the State's Digital Inclusion Plan process, please take into consideration and set aside fundings to support seniors to purchase iPads, with the devices not only increasing their ability to access online services, but support the freedom that seniors deserve to get the services at the time/place/way they choose to. Your favorable consideration of our request would be much appreciated!! Thank you. Sincerely yours, Sally Wu Center Director
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+ People from Minoritized Racial/Ethnic Groups People with Disabilities People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #4]
Email	[removed]
Zipcode	55418
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation
Comment regarding the Digital Opportunity Plan	Please ensure you use a sliding income scale for any financial assistance or opportunities instead of the usual hard and fast demarcation line. In other words, make a benefit that slides instead of "you're in, your out" based on income. The usual system is unfair to many people just getting by, leaving a system where the poorest end up better off than those of marginally higher incomes because the "working poor" are often not eligible for handouts and thus end up worse off than others. Health care, food aid and current tech programs are examples of this unfair system. Use a sliding benefits system, not an "all or nothing." Also, ensure that ALL get access to the free help from ISPs, not just "new" people, as you state. ISPs have provided no customer service whatsoever to existing customers, so they need to bring everyone up to speed now. Don't leave some people behind just because they were trying to be self sufficient. Don't penalize people. Basically, in a nutshell, programs like these marginalize the "working poor" by helping only the poorest of the poor (such as those already receiving government funds) "raise their boat," leaving the working poor's boat sunken below.
Optional: Do you identify with any of the following covered populations?	Adults Age 60+ People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	DHS State of Minnesota
Email	ami.nafzger@state.mn.us
Zipcode	55155
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	Handout: Executive summary
Comment regarding the Digital Opportunity Plan	Would like to review
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+ People from Minoritized Racial/Ethnic Groups People with Disabilities People who are Incarcerated or Re-Entering Society People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #5]
Zipcode	55435
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #6]
Zipcode	55408
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #7]
Zipcode	55429
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #8]
Zipcode	55422
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #9]
Zipcode	55408
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #10]
Zipcode	55337
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #11]
Zipcode	55337
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #12]
Zipcode	55378
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #13]
Zipcode	55102
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #14]
Zipcode	55446
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #15]
Zipcode	55343
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #16]
Zipcode	55435
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #17]
Zipcode	55126
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #18]
Zipcode	55337
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #19]
Zipcode	55420
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #20]
Zipcode	55109
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #21]
Email	[removed]
Zipcode	55904
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	We have had 4 concerned seniors who have received renewal letters for internet service ...contact us for help in filling in paperwork for renewal. Not a simple process to renew
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+ People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	EducationSuperHighway
Email	jenny.miller@educationsuperhighway.org
Zipcode	80303
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation

Comment regarding the Digital Opportunity Plan

BACKGROUND

Approximately 28 million households in the United States do not have high-speed broadband. Seventeen million of these households are offline because they cannot afford an available internet connection. This broadband affordability gap has become one of the primary inhibitors of access to economic security and opportunity. It is a reality centered in our nation's poorest communities and disproportionately impacts people of color. The Affordable Connectivity Program (ACP) can connect millions of unconnected households. Achieving national best practice ACP adoption rates can significantly accelerate closing the broadband affordability gap, connecting two-thirds of the 17 million households impacted by this gap. States should use Digital Equity Act plans and funding to implement key strategies to increase ACP adoption.

The impact of the ACP can be felt equally across partisan lines, with participation rates nearly identical in Republican (31.2% of eligible households) and Democrat states (30.8%). Our analysis of ACP enrollment data also shows that both rural and urban households benefit greatly from the program, with 13% of rural households and 15% of households in metro or urban areas enrolled in the ACP.

Millions of eligible households are not taking advantage of the program as they are unaware that the ACP exists. Surveys of low- and lower-middle-income households have found that in some communities, up to 75% of eligible households are unaware that they might be eligible for federal broadband benefits. Trust in the program is another critical barrier, as many eligible households are concerned about sharing personal information as part of the enrollment process. Finally, enrollment barriers such as application accessibility, language assistance, and documentation challenges necessitate direct support for a portion of eligible households that cannot complete the enrollment process independently.

Broad outreach alone often fails to build the trust needed to drive people to action and should be paired with outreach and enrollment support from trusted sources such as government agencies that administer benefit programs, school districts, community health centers, faith leaders, community-based organizations, and businesses they regularly interact with. These organizations have existing relationships with eligible households, know the most effective time, place, and manner to increase awareness in the communities they serve, and have established outreach channels such as in-person community events, digital marketing, emailing, phone banking, text messaging, physical information distribution and posters in high-traffic target areas. Furthermore, they provide trusted space and avenues to support enrollment in the ACP, and can help mitigate some of the challenges households face when they enroll.

COHORT MODEL

To overcome the complex barriers that keep under-resourced households offline, EducationSuperHighway (ESH) believes that state leaders should take action to convene a state-wide ACP-focused cohort that brings together these critical trusted institutions, leveraging Digital Equity Act funds to enable outreach to and support for unconnected households. At a micro level, the cohort will provide a collective framework to ensure the creation and sustainability of an ecosystem of organizations and stakeholders working on digital equity initiatives, with a particular focus on the ACP. At a macro level, this work can provide a model for what state-wide ACP implementation could look like, as well as confirm the most effective role that the state may play in supporting future capacity or competitive grant-funded recipients in alignment with Digital Equity Plans.

The cohort should consist of a series of workshops intended to promote ways in which leveraging the ACP contributes to achieving digital equity across the state. To facilitate this, ESH can provide pro bono co-facilitation of the cohort and serve as a subject matter expert and technical advisor, providing its expertise to the cohort community. This group should strive to create a collaborative space where organizations can learn from and inform one another's work across the state. It should also promote coordination and collaboration between the state and other stakeholders, alleviating the unintentional creation of silos, gaps, and/or redundancies in programming.

To date, ESH has partnered with broadband offices in several states to implement the cohort model and equip FCC grant recipients, as well as other digital equity-minded and focused organizations, with foundational knowledge on the ACP and how leveraging this program contributes to achieving digital equity across the state. This includes: 1) how the ACP operates; 2) tools, training, and resources with respect to awareness and enrollment activities and tactics; 3) the intricacies of cross-sector partnerships and campaign execution; and 4) best practices for implementing digital and on-the-ground ACP campaigns.

Roles & Responsibilities
State Broadband Offices and their staff are uniquely positioned to lead the creation and facilitation of a statewide ACP Cohort. In order to ensure an effective and streamlined cohort implementation, a Broadband Office staff member should be designated to lead the cohort engagement. It is also a best practice to include additional staffing resources with a focus on communications, who can assist with managing state-led communications, campaigns, messaging and awareness initiatives related to the cohort. A critical element of the state's role will be to incentivize motivation and participation, and states should set an ACP enrollment goal in order to achieve this that is measurable and can be used to regularly assess progress and course-correct where appropriate.

Objectives and Programming
The main objective of the ACP Cohort is to combine the expertise and experience of key institutions, organizations, and stakeholders to make a

larger impact on the state's most unconnected communities. An important output of this cohort should be to increase ACP enrollment across the state. Through the creation of curated resources and programming, and a series of workshops, the cohort should:

1. Create a forum for knowledge sharing, including an understanding of current ACP-related work across the state through guest speakers and cohort member updates
2. Share lessons learned and emerging best practices
3. Address common barriers
4. Provide opportunities for cohort members to support and reinforce one another
5. Supplement and leverage needed resources where possible (i.e., cross-posting marketing outreach and sharing digital equity advocate personnel)
6. Create a pipeline for future funding opportunities, including identifying funding intermediaries that can help expand the funds' reach and impact by supporting smaller and less resourced organizations, to ensure that key state organizations can contribute to ACP adoption

In closing, the creation of a statewide ACP-focused cohort will serve to ensure that mechanisms for increasing broadband affordability and connecting unconnected households remain a cornerstone of the state's Digital Equity Plan. The cohort will secure cohesion between the state's plan, the execution of their capacity grant funds, and alignment with the ecosystem of competitive grant funded institutions to create the conditions for successful ACP adoption statewide.

Education SUPERHIGHWAY

Digital Equity Plan Guidance

Accelerating ACP Adoption in Minnesota

Model Language To Make a State-Supported Affordable Connectivity Program (ACP) Cohort Part of Your Digital Equity Plan.

The Affordable Connectivity Program (ACP) is a critical tool for closing the digital divide.

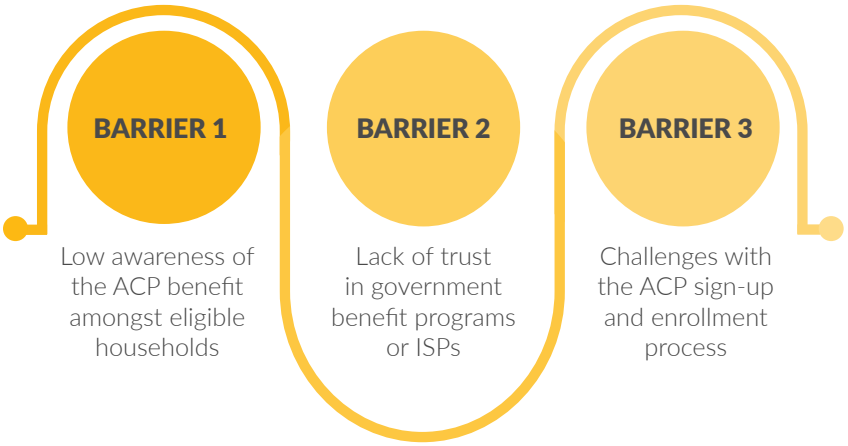
As states draft their Digital Equity plans, many are looking to increase adoption of the ACP as a critical metric to measure their success. By convening cohorts of trusted local organizations to raise awareness of the ACP and support enrollment, states can successfully leverage the program to achieve the commitments of their digital equity plans.

State-supported ACP cohorts support digital equity and internet affordability.

A state-supported ACP cohort model brings together a sustainable ecosystem of stakeholders working on digital equity initiatives. These trusted stakeholders – such as libraries, schools, housing authorities, faith-based, tribal, or community-based organizations — have existing relationships with ACP-eligible households – yet many do not have the resources to implement programming that supports sustained ACP awareness and enrollment. Digital Equity Act (DEA) funding can address this gap.

A sustainable ecosystem of stakeholders working on digital equity initiatives.

A series of workshops will create a collaborative space where organizations can learn from and inform each other's work. The group will promote coordination, alleviating the unintentional creation of silos, gaps, and redundancies in programming. Participating organizations will be equipped with tools and resources to help their communities overcome barriers to ACP adoption.



EducationSuperHighway provides pro-bono support.

Our team of experts will provide pro-bono co-facilitation and serve as subject matter experts and technical advisors to the cohort community. Our partners in cities such as Birmingham, Baltimore, Philadelphia, San Francisco, and Wilmington have seen ACP adoption rates grow 94% faster than their state averages and 174% faster than the national average.

Contact

Get in touch to use our model language to make a state-supported ACP cohort part of your Digital Equity plan.

Tim Alborg
Director of Government Affairs
tim.alborg@educationsuperhighway.org

State-supported ACP cohorts enable Digital Equity Act requirements.

An ACP cohort should be embedded in the state Digital Equity plans as a key mechanism to promote internet affordability by ensuring these crucial stakeholders are engaged and included.

Capacity grant funding should also be used to support state broadband offices and other agencies in facilitating and overseeing this work and supporting future capacity or competitive grant-funded recipients in alignment with its Digital Equity Plan vision.

Early adopters of EducationSuperHighway's state cohort model, including North Carolina and Oregon, are supporting FCC grant recipients, as well as other digital equity-minded and focused organizations, with a foundational knowledge of the ACP and how leveraging this program contributes to achieving digital equity across the state.

Key actions to convene and mobilize a state-supported ACP cohort

Plan

- Use our **model language** to make ACP a cornerstone of the DEA plan.
- Identify a **goal around ACP enrollment**.
- Develop a **statewide Digital Equity ecosystem**.
- Conduct **stakeholder mapping** to ensure organizations representing diverse populations are involved.

Mobilize

- Mobilize **digital equity-minded organizations**.
- Invite **organizations to participate** in the cohort.
- Include **state agencies** and departments, especially those who can support documentation access for ACP enrollment.

Execute

- Schedule the **workshop series**.
- Share EducationSuperHighway's **tools and resources** with cohort members.
- Establish and bolster state awareness and **communication channels**.
- Use the forum to:
  - Share **knowledge and best practices**.
  - Address **common barriers**.
  - Supplement and leverage needed **resources**.
- Track **progress** against the Digital Equity Plan and goals.

Our Mission

EducationSuperHighway is a national non-profit with the mission to close the digital divide for the 17 million households that have access to the internet but can't afford to connect. From 2012-2020 we led the effort that closed the classroom connectivity gap, connecting 49 million students to high-speed internet in schools.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Collins Oppong/Beyond Media Solutions
Email	collinsbeyond@gmail.com
Zipcode	55429
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	The Digital Equity Act certainly requires a thorough statewide review of digital inclusion, and it's great to note the work of OBD to include the assessments of eight different categories that may have lower rates of digital inclusion due to structural difficulties. These populations that include covered households, people who are elderly, people who are incarcerated (aside from those in federal correctional facilities), people who are disabled, people who face language barriers or low literacy levels, people who belong to racial or ethnic minority groups, and people who live primarily in rural areas are important segments of our populations that are often overlooked in the overall process of digitization. While considering the current state of Digital Opportunity, it's also important to understand that, even though these groups are being separately addressed in the plan, these population groups also frequently intersect and overlap. Taking this possibility into consideration is very important in aloocating the right support and opportunities.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People from Minoritized Racial/Ethnic Groups

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Mary Jo George
Email	mgeorge@aarp.org
Zipcode	55104
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	2: Planning Process: The Minnesota Model

Comment regarding the Digital Opportunity Plan

AARP MN would like to submit the following comments. We will follow up with a written letter by mail which includes the footnotes. THANKS.

August 15, 2023

Office of Broadband Development
Attn: Digital Opportunity Plan
Great Northern Building
180 5th St. E
St. Paul, MN 55101

To Whom It May Concern:

On behalf of our nearly 620,000 members statewide, AARP Minnesota appreciates the opportunity to comment on Minnesota's Office of Broadband Development (OBD) Draft Equity Plan. We want to thank OBD for inviting public comment on its draft Plan, which allows for written and in-person comments on an issue of far-reaching significance to all Minnesotans. AARP commends OBD for offering many opportunities for citizens and stakeholders to contribute to the state's digital equity plan and implementation of that Plan, and we anticipate attending one or more listening sessions.

AARP also appreciates the OBD invitation to stakeholders to establish a "Digital Connection Committee" and to register it with OBD in order to (1) receive and share planning updates from OBD and (2) "connect with digital inclusion advocates statewide." AARP looks forward to collaborating with digital inclusion advocates statewide in the months ahead.

OBD's efforts to solicit feedback and to offer Minnesotans easy ways to participate are impressive. Minnesota stands out for the "approachability" of OBD's plan, the ease of use of OBD's website, and the fact that OBD presents many ways for stakeholders to get and stay involved with the state's pursuit of digital equity.

Overall, AARP believes the Plan is well-written, user-friendly, comprehensive, practical, and visionary. The Plan will provide a useful roadmap for making progress toward achieving digital equity for all Minnesotans. The Plan also reflects extensive research, information, and data, and is also grounded in the voices of Minnesotans. AARP offers additional feedback below.

Observations and Comments about Minnesota's Draft Digital Equity Plan

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At the outset, AARP commends OBD for including on the Plan's cover page: "Upon request, this material will be made available in an alternative

format such as large print, Braille, or audio recording." This is not a message that consistently appears on states' draft digital equity plans. Yet, the message is important to signal OBD's interest in soliciting feedback from all populations.

The sections within the Plan begin with quotes from Minnesotans who participated in focus groups. This anchoring of potentially dense subject matter in the voices of Minnesotans helps to make the Plan accessible and relevant. Reflecting a tone of collaboration and inclusiveness, OBD states:

To be clear, this is not OBD's digital opportunity plan for Minnesota. Rather, this plan belongs to Minnesota. This is Minnesota's digital opportunity plan, and it has been OBD's immense privilege to be the public steward charged with piecing it together.

The Plan integrates a focus on the human aspect of digital equity. For example, after providing a comprehensive definition of digital equity (based on NTIA's NOFO), the Plan aptly and succinctly states: "Absent from this definition but absolutely essential are trust, relevance, and safety. These conditions must be present in order for any individual to adopt technology in ways that are meaningful to them." AARP fully concurs that "trust, relevance and safety" are key, including for older adults, and also echoes the Plan's emphasis on people rather than technology."

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AARP fully supports the Plan's three goals (Connect People to People, Connect People to Information, and Connect People to Resources). Under Goal 3.1.1.2, AARP suggests language be added to encourage growing relationships with proven digital skills providers in the community and to recognize the important role Community Anchor Institutions (CAIs) play in this space.

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"(1) Minnesotans can access comprehensive data and mapping tools to evaluate digital opportunity in their area as well as statewide. (2) All

Minnesota cities, counties, and tribes have the opportunity to create localized data-driven digital opportunity plans to support their residents and tribal members. (3) All city, county, and tribal government units have the opportunity to re-design their websites so that they are fully accessible to people with disabilities and people with limited English literacy skills."

AARP has long advocated for data-driven policymaking and program implementation: data and information can guide the Plan's implementation and shed light on the state's progress in achieving objectives.

On Goal 3.3.1.2, AARP suggests including an evaluation of the long-term effects of having a large-screen device or smartphone to help improve the model for a statewide device discount program. On Goal 3.3.1.3, AARP suggests including older adults as one of the specified populations to forge new opportunity pathways. This could explore further collaborations with Minnesota's aging community within state and local government, including the Governor's Council on Age-Friendly Minnesota.

Anchored in Broader Context

The Plan acknowledges the existence of larger policy gaps and problems regarding high-speed internet access and the corresponding need for regulatory reform but then moves on without describing potential reform. Acknowledging the larger regulatory context is important - because, of course, any state's ability to achieve digital equity is directly affected by state and federal policy. The Plan states:

This plan exists in the middle of a particular kind of tension between what is permissible and what is needed. The gaps in digital opportunity that many individuals confront daily are often a consequence of long-term gaps in federal, state, and local policy that have allowed people to be left behind. For gaps to be closed in the long-term, new federal, state, and local policies need to be in place. Without addressing the inequities built into this system, the same gaps will remerge and persist. It is, however, outside of the purview of OBD to independently recommend policy changes, serve as a regulatory body, or propose regulatory reform.

Understanding that this is beyond the scope of the Plan, AARP nonetheless voices its support for any necessary regulatory reform, including defining digital equity, and is hopeful that the Minnesota State Legislature addresses policy gaps so that digital equity goals can be achieved more efficiently.

Also, the Plan adopts three terms that differ from those in the Digital Equity Act ("assets" becomes "existing strengths"; "needs" becomes "unsupported necessities"; and "barriers" becomes "systemic challenges"). By clarifying the terms, the Plan aptly clarifies the constraints and goals of achieving digital equity, contributing to a clearer analysis and discussion of relevant issues.

The swapping out of terms is also consistent with the Plan's acknowledgment that broader societal issues affect digital equity, which the Plan simply can't address/resolve but is nonetheless important to recognize. (No digital equity plan can in and of itself overcome underlying systemic challenges.) For example, the Plan explains:

"Needs" suggests a limited deficit with a fulfillment-based solution. "Unsupported necessities" highlights the enduring nature of inequity, the complexity of remediation, and the role of systemic supports in fostering sustainable change.

"Barriers" places the onus to overcome on the individual who has been digitally excluded, oftentimes outside of their own control. "Systemic challenges" acknowledges that public policy and system design underlie and reinforce many barriers.

The Plan explains further: "The choice to rename allows this plan to acknowledge Minnesotans' past and current digital resilience and resourcefulness while addressing how systemic changes can create a more equitable future."

Addressing Covered Populations

The Plan addresses separately each of the covered populations and also importantly recognizes that the individual populations overlap:

Identity is complex and overlapping. While each of these covered populations is addressed separately in this plan, this separation is entirely artificial. It is very conceivable for any person to fit into more than one of these stated categories and/or to exist within and across different categories during different phases of their life. Moreover, no group of people is a monolith. Within each category are countless valid ways of living, knowing, and being.

Through its previously created Digital Connection Committees (in January 2023), OBD has already created a strong foundation for collaboration among diverse populations and stakeholders. OBD plans for the number of such committees to increase to broaden public input yet further.

Coordination with Infrastructure Deployment

The Plan describes solid coordination within Minnesota between digital equity planning and BEAD planning - both funding sources are administered by OBD. Among other things, "[d]uring the digital opportunity plan public comment period, infrastructure staff will accompany digital equity staff at as many public meetings as feasible."

The Plan appropriately connects digital equity goals with infrastructure

grants, stating, for example: "Collaborate with internet service providers who are receiving state and federal infrastructure funds to ensure newly connected households understand the basics of cybersecurity." Older adults are often targets of internet-based scams, so AARP fully supports efforts to coordinate cybersecurity education with internet access deployment: privacy and safety are key concerns of older adults.

Affordability/Digital Skills/Technical Support

The Plan's goals of increasing enrollment by 2028 in the ACP and the Lifeline Program to 70% (from baseline measures of 27.9% and 12.9%, respectively) are important and ambitious. AARP stands ready to assist Minnesota with outreach for these two programs (or any successor programs). At the federal level, AARP is actively advocating for the continuation of the ACP, which, as the Plan recognizes, is running out of funds.

The Plan also recognizes the precariousness of internet access: "Affordability creates a certain digital precarity that can result in a person having full access to technology one day and no access the next." In its description of objectives and activities to enable people to access resources, the Plan includes specific measures that address AARP's long-standing concerns (for example, the importance of affordable equipment - having internet access through a laptop or desktop computer rather than through a smartphone; digital skills and technical support; ability to identify and to mitigate cybersecurity risks).

In discussing the low-income population as defined by the Digital Equity Act, the Plan aptly observes:

Regarding individuals above 150% of the poverty level as wholly separate from those below 150% of the poverty level is ultimately a reductive activity. Even as some households will never move above or below 150% poverty, many will experience life on both sides of this invisible line. Moreover, income alone is an imperfect metric for determining poverty. Households with income above 150% poverty facing high essential expenses (often related to healthcare, childcare, rising food costs, and transportation) may experience a net financial strain akin to poverty without being able to access services and supports that are designated for low-income households.

AARP concurs fully with this observation. AARP has been a long-time advocate of affordable high-speed internet access for all. Many older adults who do not qualify for ACP and Lifeline may be unable to afford internet access and the necessary equipment to support that access. For this reason, AARP welcomes the Plan's intention: "Although the Digital Equity Act limits poverty measurements to income, this section of Minnesota's digital opportunity plan also strives to recognize the net financial challenges faced by more than one-third of Minnesota's

residents."

Importance of Data-Driven, Informed Policy Making and Program Implementation

As stated earlier, AARP wholeheartedly supports the goal of transparency and widespread access to data. The Plan states in this regard:

Making data and information readily available allows for collaboration and informed decision-making, empowering communities to bridge the digital divide and fully utilize the resources offered by technology. By championing accessibility, this goal simultaneously ensures that everyone has an equal opportunity to benefit from digital availability of information.

Assessment of Existing Digital Strengths and Unsupported Digital Necessities

The Plan includes a comprehensive assessment of strengths and unsupported necessities as well as of systemic challenges that impede digital opportunities. This includes statewide assessments as well as assessments specific to each of the covered populations. For example, relative to rural areas:

As of July 10, 2023, Minnesota's largely urban 3rd, 4th, and 5th Congressional districts had enrollment rates [for ACP] of 23%-34% among eligible households. At the same time, Minnesota's rural 1st, 7th, and 8th districts had enrollment rates of 18%-25%. A 2023 survey by the MN Department of Health found that 82% of rural Minnesotans reported reliable enough internet access for video telehealth compared to 91% of Minnesotans in urban areas.

Affordability and access to health care by rural residents are critical goals for AARP, so AARP appreciates the Plan's inclusion of relevant benchmarks in rural areas relative to both metrics.

Adults Aged 60 and Over

The Plan observes that about 24% of Minnesotans-1,348,000 people-are ages 60 and over, and this percentage has been steadily increasing. This population, of course, overlaps with the other covered populations, which the Plan recognizes at the outset. This overlap means, in turn, that differing approaches may be needed to help achieve digital equity within the population of older adults, depending on whether they also live in rural areas, lack English proficiency, are veterans, have disabilities, etc.

The Plan includes comprehensive data about older adults (regarding, for example, the distribution of older adults among different living situations and levels of voter turn-out, workforce engagement, and volunteering), which affects digital equity planning. AARP wholeheartedly agrees with OBD that:

Technology access is essential in ensuring Minnesota's older adults can age with support, care, dignity, and independence. It also plays an important role in improving their long-term quality of life outcomes.

Moreover, the Plan includes a comprehensive discussion of existing digital strengths for older adults, unsupported digital necessities for older adults, and systemic challenges impeding adoption. For example, one of the unsupported digital necessities (i.e., areas for improvement) concerns health care, an issue of great importance to AARP members: "About half of healthcare providers responding to a survey by MN Department of Health observed 'disparities in broadband access, digital literacy, and comfort with using technology ... are particularly salient for patients with a lower socioeconomic status, elderly patients, and patients living in remote locations.'"

AARP appreciates OBD's acknowledgment of AARP's Senior Planet Program, which provides technology classes for seniors, both in-person and online, and the Governor's Council on Age-Friendly report that recognizes broadband as a basic need.

Among the systemic challenges are budget constraints and the fact that "[s]ervices for older adults are sometimes designed without guidance from older adults," and the "dominant narrative on aging perpetuates stereotypes about older adults while reducing their perceived agency." AARP suggests the Plan expound on societal factors, namely ageism, as one important issue undermining internet adoption by older adults and recommends that it be moved to the introductory paragraph.

Another unsupported digital necessity acknowledged by the Plan concerns isolation. This is another priority area for AARP as many older adults deal with isolation, and some experienced extreme isolation during the COVID pandemic.

AARP suggests additional focus be placed on digital skills development of older adults. While the Plan appropriately calls for a measure in Section 3.1.2, objective 2, to reflect the number of individuals reached through expanded and new digital skills programs, Section 5.3 might describe the need and solution in greater detail, given how important this area is for older adults. Establishing an appropriate baseline for this objective will be very important. Some states have proposed digital skills surveys as one method to accomplish this. Employing this approach can make it easier to measure progress in the coming years.

AARP further suggests the Plan call for utilizing emerging best practices in the field of digital skills development (e.g., multi-week courses to grow trust and community with this population).
And that, if available, any information regarding the 60+ population

re-entering the workforce via technology training programs be included in Section 5.3.1 as a digital strength.

AARP appreciates the effort that OBD has made to become familiar with the specific and unique benefits of and challenges to older adults' adoption and use of high-speed internet access, as well as OBD's recognition that older adults are not a homogenous group.

Conclusion
AARP commends OBD for its well-researched, thoughtful, and comprehensive draft digital equity plan. AARP also commends OBD for offering Minnesotans and stakeholders (as part of the preparation of the draft plan and afterward) ample opportunities for contributing to the State's planning for and achievement of digital equity.

In conclusion, the Plan is practical, realistic, and ambitious, describing constraints over which the State has no control (such as winters, which are a "beast" (rolling out infrastructure in frozen ground is not easy!), strengths that the State can build off of, unsupported necessities that merit attention, and systemic issues that, although beyond the scope of a digital equity plan, need to be recognized as impediments to progress.

Above all, it is a Plan built upon listening to Minnesotans and one that demonstrates a commitment to future collaboration among Minnesotans. AARP looks forward to reviewing the final Minnesota Digital Equity Plan and contributing to OBD's plans and programs in the coming years. If you have questions or wish to discuss this matter further, please don't hesitate to contact me at cmcleer@aarp.org or 65e1-726-5640.

Sincerely,

Cathy McLeer
State Director, AARP Minnesota

Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

AARP Minnesota

1919 University Avenue W., Suite #500 | Saint Paul, MN 55104
1-866-554-5381 | Fax: 651-644-5539 | TTY: 1-877-434-7598
aarp.org/mn | aarpmn@aarp.org | twitter: @aarpmn
facebook.com/AARPMinnesota

August 15, 2023

Office of Broadband Development
Attn: Digital Opportunity Plan
Great Northern Building
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Observations and Comments about Minnesota's Draft Digital Equity Plan

[1] See Appendix A for a list of the digital connection committees established to date.

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[2] The Plan states: "Digital connection depends on human connection. As such, OBD's intention with these three goals is to center people—not things—in all digital opportunity planning, activities, and solutions. Affordable internet access, access to devices, and digital skills support are all essential tools in advancing digital opportunity; people create the systems that make the meaningful use of these tools possible."

Among other things, AARP appreciates the Plan's emphasis on the importance of access by all to information and data. Among the subsidiary parts of the second goal ("Connect People to Information") are:

> "(1) Minnesotans can access comprehensive data and mapping tools to evaluate digital opportunity in their area as well as statewide. (2) All Minnesota cities, counties, and tribes have the opportunity to create localized data-driven digital opportunity plans to support their residents and tribal members. (3) All city, county, and tribal government units have the opportunity to re-design their websites so that they are fully accessible to people with disabilities and people with limited English literacy skills."

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[3] AARP recommends Digital Connection Committee members be asked to provide input or review curriculum deployed through state agencies.

The Plan appropriately connects digital equity goals with infrastructure grants, stating, for example: "Collaborate with internet service providers who are receiving state and federal infrastructure funds to ensure newly connected households understand the basics of cybersecurity." Older adults are often targets of internet-based scams, so AARP fully supports efforts to coordinate cybersecurity education with internet access deployment: privacy and safety are key concerns of older adults.

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[4] Presently, more than half (53.6%) of ACP participants access the internet through mobile broadband, which, in AARP's view, provides an inferior form of internet access relative to fixed broadband. https://www.usac.org/about/affordable-connectivity-program/acp-enrollment-and-claims-tracker/additional-acp-data/ site visited August 25, 2023.

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Affordability and access to health care by rural residents are critical goals for AARP, so AARP appreciates the Plan's inclusion of relevant benchmarks in rural areas relative to both metrics.

Adults Aged 60 and Over

The Plan observes that about 24% of Minnesotans—1,348,000 people—are ages 60 and over, and this percentage has been steadily increasing. This population, of course, overlaps with the other covered populations, which the Plan recognizes at the outset. This overlap means, in turn, that differing approaches may be needed to help achieve digital equity within the population of older adults, depending on whether they also live in rural areas, lack English proficiency, are veterans, have disabilities, etc.

The Plan includes comprehensive data about older adults (regarding, for example, the distribution of older adults among different living situations and levels of voter turn-out, workforce engagement, and volunteering), which affects digital equity planning. AARP wholeheartedly agrees with OBD that:

> Technology access is essential in ensuring Minnesota's older adults can age with support, care, dignity, and independence. It also plays an important role in improving their long-term quality of life outcomes.

Moreover, the Plan includes a comprehensive discussion of existing digital strengths for older adults, unsupported digital necessities for older adults, and systemic challenges impeding

adoption.[5] For example, one of the unsupported digital necessities (i.e., areas for improvement) concerns health care, an issue of great importance to AARP members: "About half of healthcare providers responding to a survey by MN Department of Health observed 'disparities in broadband access, digital literacy, and comfort with using technology … are particularly salient for patients with a lower socioeconomic status, elderly patients, and patients living in remote locations.'"

AARP appreciates OBD's acknowledgment of AARP's Senior Planet Program, which provides technology classes for seniors, both in-person and online, and the Governor's Council on Age-Friendly report that recognizes broadband as a basic need.

Among the systemic challenges are budget constraints and the fact that "[s]ervices for older adults are sometimes designed without guidance from older adults," and the "dominant narrative on aging perpetuates stereotypes about older adults while reducing their perceived agency." AARP suggests the Plan expound on societal factors, namely ageism, as one important issue undermining internet adoption by older adults and recommends that it be moved to the introductory paragraph. [6][7]

Another unsupported digital necessity acknowledged by the Plan concerns isolation. This is another priority area for AARP as many older adults deal with isolation, and some experienced extreme isolation during the COVID pandemic.

AARP suggests additional focus be placed on digital skills development of older adults. While the Plan appropriately calls for a measure in Section 3.1.2, objective 2, to reflect the number of individuals reached through expanded and new digital skills programs, Section 5.3 might describe the need and solution in greater detail, given how important this area is for older adults. Establishing an appropriate baseline for this objective will be very important. Some states have proposed digital skills surveys as one method to accomplish this. Employing this approach can make it easier to measure progress in the coming years.

AARP further suggests the Plan call for utilizing emerging best practices in the field of digital skills development (e.g., multi-week courses to grow trust and community with this population).[8] And that, if available, any information regarding the 60+ population re-entering the workforce via technology training programs be included in Section 5.3.1 as a digital strength.

AARP appreciates the effort that OBD has made to become familiar with the specific and unique benefits of and challenges to older adults' adoption and use of high-speed internet access, as well as OBD's recognition that older adults are not a homogenous group.

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[5] The Plan is similarly comprehensive regarding other covered populations; in these comments, AARP focuses primarily on older adults.

[6] *The Effect of Ageism on the Digital Divide Among Older Adults*. 2016. Access at https://www.detroitseniorsolution.org/app/uploads/2022/02/McDonough_The-Effect-of-Ageism-on-the-Digital-Divide-Among-Older-Adults.pdf

[7] *An Inconvenienced Youth? Ageism and its Potential Intergenerational Roots*, 2012. Access at https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3838706/

[8] *The Digital Inclusion of Older Adults during COVID-19: Lessons from a Case Study of Older Adults Technology Services (OATS)*. April 2022. Access at https://pubmed.ncbi.nlm.nih.gov/33882782/

Conclusion
AARP commends OBD for its well-researched, thoughtful, and comprehensive draft digital equity plan. AARP also commends OBD for offering Minnesotans and stakeholders (as part of the preparation of the draft plan and afterward) ample opportunities for contributing to the State's planning for and achievement of digital equity.

In conclusion, the Plan is practical, realistic, and ambitious, describing constraints over which the State has no control (such as winters, which are a "beast" (rolling out infrastructure in frozen ground is not easy!), strengths that the State can build off of, unsupported necessities that merit attention, and systemic issues that, although beyond the scope of a digital equity plan, need to be recognized as impediments to progress.

Above all, it is a Plan built upon listening to Minnesotans and one that demonstrates a commitment to future collaboration among Minnesotans. AARP looks forward to reviewing the final Minnesota Digital Equity Plan and contributing to OBD's plans and programs in the coming years. If you have questions or wish to discuss this matter further, please don't hesitate to contact me at cmcleer@aarp.org or 65e1-726-5640.

Sincerely,

Cathy McLeer

Cathy McLeer
State Director, AARP Minnesota

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #22]
Email	[removed]
Zipcode	55987
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	I would like to see help for the homeless. I am also disabled and continously here there is going to be monies available for Winona. It would be nice if when I go downtown I could at least be able to get in to some of the shops and other establishments without calling the phone number to help me get in. Could defray shopping and losing money. More places should be handicap accessible. Don't see those monies being used for this. Thank you Also bullying on the busses.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas People with Disabilities People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #23]
Email	[removed]
Zipcode	55407-2413
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	I'm really glad this passed, and so glad to see this work being done. I'm wondering if there is anything that can be done on the non-monetary side to get large internet utilities to address the uneven way in which they provide and upgrade service. I recently moved into Ward 11 Minneapolis, and was fortunate enough to be able to sign up for high speed fiber through USI Wireless. But then I looked at their service map and was so disgusted that I first researched if there were other providers I could use besides them. They had dead zones directly over the old red zones, practically to the block. How are we going to recover from our racism emergency if we let private utility companies continue this digital access segregation? I love that the state of MN has committed money to positively fill these infrastructure gaps itself. But on the other side of the equation, the state of MN can do a lot to make these companies answer for their patterns and practices too. I love being Minnesotan, but I don't like that we refuse to have tough conversations with the businesses who are perpetuating our worst disparities, especially while under the guise of providing a public utility! Someone living in North Minneapolis should have the same speed internet access as someone with lakefront property in Uptown or Wayzata. I hope that this is the first step in a larger plan towards digital equity for all Minnesotans.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #24]
Zipcode	55037
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	I live 2.5 miles northwest of Hinckley and am unable to receive quality internet. In the past have tried Century Link and it was unreliable and slow so discontinued(many times no service and had to wait days before it was restored). It would cost too much for satellite ,Minnesota Power does not offer internet service.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #25]
Email	[removed]
Zipcode	55129
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	Handout: Executive summary
Comment regarding the Digital Opportunity Plan	Apparently no one can get coverage at Woodbury HS. They had to go out to the parking lot to get coverage for fundraising transactions.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+ People from Minoritized Racial/Ethnic Groups Veterans People with Disabilities People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #26]
Email	[removed]
Zipcode	55401
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan	As a librarian at a public library, I appreciate that the plan mentions the role that public library systems play in giving residents access to computers, broadband internet, and software. Libraries ARE the digital inclusion safety net for many people. Public libraries are where people land when they don't know where else to go to perform essential online tasks. Many public agencies and employers send people to public libraries to use the computers and internet access with the assurance, "they will help you". Sometimes, people arrive at the library assuming staff will complete forms or other tasks on their behalf. Therefore, any plans for digital navigation services, including technology instruction and skills coaching, must directly involve and support frontline, public services staff in libraries. If community organizations receive funding for digital navigation, make sure that public library staff know how and to whom to refer people to these partners. In addition, we must either fund additional library staff and train us to do digital literacy and skills instruction and to be digital navigators or station digital navigators in public library buildings. It is crucial that frontline public library staff are at the table when digital inclusion efforts are being planned to ensure that we have qualified staff on the ground in libraries to meet the needs of people where they are. Do not assume that larger governmental bodies such as counties or cities are involving their public library staff in planning or implementation of digital inclusion efforts. These larger governmental bodies often completely ignore the need for direct, in-person support to people in our library buildings. Just because the city or county has a digital inclusion plan doesn't mean that they are paying any attention to people who land in the library or to the needs of the libraries or library staff. It doesn't mean that true collaboration is happening. Libraries and frontline library staff can and should be leaders in digital inclusion, not an afterthought. At the same time that I think we must teach people how to use the internet, computers, and other technology, I'm also concerned about people who simply are not capable of learning to use computers and other information technology. These can include people with brain injuries or dementia, people who are illiterate, people with learning disabilities, people with intellectual disabilities, some elderly people, and people who are simply unwilling. What are their options to accomplish essential and necessary tasks such as filling out their employment applications, filing their taxes, enrolling in Medicare, attending telehealth appointments, submitting immigration forms, applying for public benefits and assistance, and so much more? We need digital navigators in every community who can step in and do these tasks for people who are unable or unwilling to learn essential digital skills while still maintaining individuals' privacy and cybersecurity.
Optional: Do you identify with any of the following covered populations?	People with Disabilities

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Melissa Brusacoram
Email	melissa.brusacoram@aeoa.org
Zipcode	55741
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	6: Areas of Alignment
Comment regarding the Digital Opportunity Plan	Adult Basic education (ABE) is a statewide program with 3 standards of education as guiding factors. ABE serves thousands of students through hundreds of programs around the entire state. One standard that guides them is Digital literacy. ABE oftens works with people from marginalized communities including those with low incomes, those that identify from the BIPOC community, immigrants, and non-traditional post-secondary students. ABE applies digital literacy skills to all classes, such as classes for the High School Equivalency tests, GED and HISET, even offering online courses for free to allow people to study and prepare for their tests. These online courses allow students to remove barriers such as workdays, travel plans and day care, allowing them to participate in classes around their schedules. Many ABE programs even loan devices out to students to allow them to study or assist students in finding low-cost devices to purchase through programs such as PC's for People. ABE offers other classes such as English as a second language, Citizenship, college preparation, family literacy and career readiness classes such as preparation for CDL classes, nursing assistants, and school paraprofessional classes. All of these classes incorporate digital skills, and even offer many of them virtually. The pandemic highlighted the need for virtual classes, and these continue to this day in many ABE programs. For example, the AEOA Virginia ABE location offers both ESL and Citizenship classes virtually and is prepared to offer other classes virtually as needed. Your plan needs to bring ABE into the conversation, as ABE has worked toward true digital equity for many years.

Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	3: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	The plan outlines strengths in local communities, both metro and rural, as offering digital services from local libraries and Careerforce centers. However, both of these services have decreased access to services in the past 5 years, particularly during and after the pandemic. Many Careerforce centers reduced the number of computers available to the public in the last 5 years. For example, the Virginia Careerforce location reduced computer availability from 15 computers to 3. Also the amount of hours available at some Careerforce locations have been greatly reduced. For example, upon reopening during the pandemic, the Hibbing Careerforce reduced its days open to the public from 5 down to just 2 days a week, the hours that it continues to maintain. Local libraries may have desktop computers open to use, but many libraries have policies in place to prevent patrons from using the computers if they owe a fine to the library. If said person can't afford to pay the fine first, they are not allowed to use the public computers. Being that people of lower income are more likely to seek free public library services for things such as seeking employment, participating in online education classes, and registering to take a GED test, all done using the internet, this greatly impacts their future ability to increase their employability and wages. Libraries often also limit hours of usage on the computers to 1 hour per patron making it difficult for people looking to further their education via online courses, something ABE provides to students at no cost.
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Robin Turnblom
Email	rturnblom@hclib.org
Zipcode	55401
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan	I work as a librarian in a major metro area public library branch in the Twin Cities. I appreciate much of what is in the draft of the Digital Opportunity Plan as it pertains to libraries, but I'd like to ask for more. Clearly, libraries are important as community gathering spaces--several of the public comment sessions are being held at libraries. As evidenced in the report, they are also clearly a critical technology provider for folks, for both WiFi and computers (p. 32). I'd like to add that library staff are already providing digital navigation support for the community, every day. I support OBD's goal to provide funding to pilot digital navigator positions at libraries and other community partners (p.16). Digital navigators can be widely defined. In libraries, which were often open during the pandemic when other public service agencies were not, we need digital navigators who work on the floor, in person with patrons, as library staff already do. Digital navigators don't have to be proficient in languages other than English, but my hope is that some of the focus of funding provided would be for attracting navigators who have those skills. Digital navigators are especially critical for libraries who do not have enough staff to help with in-depth computer questions for longer periods of time. On page 40, this is presented as a rural library issue, but FTE alone cannot demonstrate the demand being placed on employees. Metro library staff are also feeling squeezed. We want to provide more services but often are unable to do so because of staffing. More digital navigators on staff would be great, but I wish this plan included support for the library staff who are already doing this work, such as funding for training. I have spoken to colleagues who don't feel comfortable answering certain technology questions because they have not been trained. If libraries are such critical community hubs for digital opportunities, then support for libraries and library staff needs to be stronger.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Stephany Medina
Email	Medinas@communityhealthboard.org
Zipcode	55802
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	1: Introduction
Comment regarding the Digital Opportunity Plan	Consider reversing the order of sections 1.1.2 "Goals and Objectives" and 1.2.1 "Defining Digital Opportunity." The definitions are important to understanding the goals and objectives. The goals and objectives did not make sense to me until after I read the definitions.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	4: Goals
Comment regarding the Digital Opportunity Plan	I see Goal 3 as a top priority. Access to devices and affordable internet at a usable speed is important, especially in rural regions. Many folks in rural areas do not currently have internet services available to a reasonable speed or price (e.g., cannot join a Zoom meeting without interruptions). Goal 3 is very supportive of Goal 2.2. Grant funds can support local plans to build a more adequate broadband infrastructure. While education and data are important infrastructure pieces, access to devices and affordable internet are where community members will feel impacts most tangibly. Goal 2.1 could use clarity (Minnesotans can access comprehensive data and mapping tools to evaluate digital opportunity in their areas as well as statewide.) The objectives make it sound like the audience for the data is professional practitioners, but the goal makes it sound like the audience is residents. What data is being collected and for what use(s)?

Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	Appendices A B, C
Comment regarding the Digital Opportunity Plan	Thank you for drafting this plan and including opportunities for feedback in the process! This is important work that connects strongly to the opportunity for holistic wellbeing of Minnesotans!
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas People from Minoritized Racial/Ethnic Groups

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Elena Foshay
Email	efoshay@duluthmn.gov
Zipcode	55802
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan	3.1.1 #2 - Providing grants to support Digital Navigators is important, and this role is needed in communities of all sizes, all over the state, in a wide variety of settings. There is just as much a need for this role in urban communities as rural, and particularly in places with a higher concentration of older adults, New Americans, Native Americans, and individuals living in generational poverty. These grants should be available to communities of all sizes, through a wide variety of organizations that host public computer access, including, but not limited to, libraries, CAP agencies, CareerForce locations, schools, and community-based organizations. 3.1.1 #3a This section should be adjusted to include training resulting in industry-recognized credentials, to perform both repairs and tech support. We recommend that this effort be connected to Local Workforce Development Boards, who can provide leveraged support in the form of tuition assistance for training costs, and funding for wages for youth workers. 3.2.1 #2a Some communities have already completed studies of digital opportunities at their own expense. Expand to include grant funding for implementation of strategies outlines existing plans, for those communities who have already completed the planning step. 3.3.1 #3c CareerForce locations are willing and able to partner to expand digital skills resources and training, as most locations have computer labs open to the public for job search, job applications, resume writing, Unemployment Insurance applications, and more. In the past, these computer labs were staffed with digital navigators who provide over-the-shoulder digital literacy training in the moment and specific to the individual's needs. There is a need for additional resources to expand open hours of these labs, and ensure they are staffed. Those who need the most assistance are best served through in-person services.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	5: Implementation

Comment regarding the Digital Opportunity Plan	5.1.3 Under Systemic Challenges, one key challenge that's missing is that, in much of Greater Minnesota, there isn't competition for broadband internet access providers. This results in high prices and poor quality service in some communities. Monthly internet costs increased significantly after the pandemic, where even middle-income households feel the impact. And in Greater Minnesota communities deemed 'served,' meaning that broadband coverage is theoretically available, there are pockets without broadband access or where service is slow or spotty. The quality of service for the price just doesn't add up, but state grants aren't available to support investment in improving existing systems.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+ People from Minoritized Racial/Ethnic Groups People with Disabilities People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #27]
Email	[removed]
Zipcode	55411
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation
Comment regarding the Digital Opportunity Plan	I appreciated the idea of utilizing high schools to train students to provide tech support and repairs. Since trust in their teacher is such a significant factor for folks with low digital literacy who are trying to improve their skills, I'd love to see expansion on this idea. Perhaps utilizing programs that already exist to provide employment training to youth (Step Up, Emerge, etc.), so youth can be paid to teach their family members in-home.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	3: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	There are concerns about funding from BEAD going primarily to Greater MN. While we understand it's needed there, we also want to ensure that closing internet service gaps in the Metro are also prioritized by OBD and maps continue to be updated to reflect those gaps. Thank you for all your hard work on this plan!
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #28]
Email	[removed]
Zipcode	56057
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	Metronet has been in the Cordova area (southeast of Le Center). No company has contacted me personally to promote their company and to suggest how I can be hooked up to the Internet. I have been in contact with Metronet several times and have seen no answers about my questions nor anyone even contacting me.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	7: Conclusion
Comment regarding the Digital Opportunity Plan	I am angry that I am very unimportant to any of the Internet companies that they can't take the time to personally come to my house and inform me how I can be hooked up to the Internet. It is a disservice to the rural community and those out on the farm land that we are not important enough for assistance. I have given my name, address, phone number several times to Metronet and had no action on their part. What a disappointment that they are receiving funding, but no action on for me. Are they worthy of more funding??????
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #29]
Email	[removed]
Zipcode	56362
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	7: Conclusion
Comment regarding the Digital Opportunity Plan	$65 Billion would be better spent on subsidizing StarLink for those who need it. Let the private business handle it. Simple. This would: *Remove the bureaucracy, its wastefulness, salaries, "studies" and "reports.". *Remove unnecessary committees, state Broadband Offices, Help Lines and Support. *Stop all physical broadband installations across Minnesota. $380MM invested already?! In what? Physical wires and legacy communications? *This report is a bloated mess and creates complication. *Determine who legitimately needs help getting connected and set them up with StarLink satellite access. It's Plug & Play. Simple and simply works, right out of the box. Cover the upfront hardware fee of ~$600.00. Make recipients pay a small amount per month so they have skin in the game. Maybe $20 per month (regular $90-110). *This way the money goes to actually solving the problem instead of waste, inefficiency and corruption.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	David Avery
Email	david.avery@windstream.com
Zipcode	72212
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	ACP/Affordability Participation in the Affordable Connectivity Program (ACP) should be the only affordability requirement related to BEAD funding requirements. Windstream is a proud participant in the ACP and joins OBD in the desire to ensure the continuity of the Program. Windstream is undertaking extensive Congressional advocacy efforts regarding the continuation of the ACP. A mandated fixed long-term pricing is a strain on providers' autonomy and ability to align with economic challenges as costs increase over the life of a customer. Ultimately, it will serve as a prohibitive measure discouraging large and small providers' participation in the program, putting the OBD's goals in opposition with one another. Windstream's Digital Equity & Digital Literacy Efforts Windstream is proud of its robust digital literacy efforts throughout the country to reduce the digital divide. In August 2023, Windstream announced it offers free online courses for children and adults through its Kinetic Digital Literacy Program which is available to Minnesota residents. Through the program, users are taught essential computer skills, basic office software skills, and daily technology skills. Anyone anywhere can take a course for free anytime by visiting Kinetic's digital literacy website, (https://www.windstream.com/residential/digital-literacy-program). Learners do not need to register. Nor do they need to be Kinetic customers. And they can take the courses as many times as they like.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #30]
Email	[removed]
Zipcode	55009
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We are the poster children for rural Minnesotans under served by wired broadband. We and our neighbors are located about 1 mile off the county road where broadband fiber exists. It doesn't pay our provider to to upgrade us from copper to fiber due to the cost. We all have the same service provider - Nutelecom/Nuvera New Ulm. Our usual speed is <14 mbps download and <2 mbps upload. Availability to all three homes is overstated on the FCC map so we are all sure we are very low priority for any public funds. Are we eligible for the Broadband Line Extension Program?
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+ Veterans

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #31]
Email	[removed]
Zipcode	55123
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	It's important to invest in exploring how digital connectivity is being used to keep incarcerated parents connected to their families. There is a disconnect between training people of color into technical roles, & the hiring of people of color in tech. Invest in apprenticeships & work/training programs specifically for Black, SE Asian, & Indigenous people. Focus on providing services in native languages, & allocate budget to train foreign language speakers as digital navigators. fNon english speakers are very vulnerable to scammers. Refugees being placed in our state should be given computers & hotspots. There is nearly no support for bringing folks with disabilities in to digital access. Very few strategies to integrate them & help them find employment which makes them experience a lot of poverty.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+ People from Minoritized Racial/Ethnic Groups People with Disabilities People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Comcast
Email	Anna_Boroff@comcast.com
Zipcode	55107
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	Handout: Executive summary

Comment regarding the Digital Opportunity Plan

Comcast Cable Communications, LLC, on behalf of its subsidiaries (together, "Comcast"), submits this letter in response to the Minnesota Draft Digital Opportunity Plan ("Draft Plan" or "Plan"). Comcast thanks the Minnesota Office of Broadband Development ("OBD") for seeking stakeholder comment and commends it for an exemplary start to achieving digital opportunity for all Minnesota residents and communities.

We applaud Minnesota's work to date, which as the Plan identifies has resulted in Minnesotans having a slightly higher rate of home internet subscriptions than the national average. We also appreciate the statement that "this is not OBD's digital opportunity plan for Minnesota. Rather, this plan belongs to Minnesota." This sets a clear tone for the task at hand, that for digital opportunity goals to be met, there needs to be a broad and shared focus and accountability to achieve success. We could not agree more - and fully subscribe to the notion that for digital opportunity efforts to make a meaningful impact, it starts by clearly articulating the critical role that public, private, and non-profit stakeholders play, as well as their shared interests in making sure these efforts are impactful.

The Plan accurately identifies that the digital divide results from a complex and interrelated mix of barriers and that trust, relevance, and safety are essential to success in closing this divide. The Plan also rightfully acknowledges that a unified group of digital equity advocates across Minnesota will increase shared knowledge and expertise and develop a network of practitioners who can continue to learn from one another through real-time collaboration and communication around partnerships, best practices, and initiatives that meaningfully contribute to adoption and equity efforts in their communities. For example, the Plan points to promising models, such as digital navigators, that can move the needle in both rural and urban communities alike. A statewide network of digital navigator practitioners can grow and learn from one another's experiences and share tactics and strategies for increasing Affordable Connectivity Program ("ACP") adoption, expanding digital skilling, and connecting more individuals to digital services. Additionally, establishing this network will provide speed to market in launching new tools and strategies to address skills training, cybersecurity training, and digital opportunity pathways - which are key focus areas that the Plan has identified.

We also agree that making informed and meaningful investments backed by data and based on proven strategies that yield results is of utmost importance. While the Broadband Equity, Access, and Deployment ("BEAD") Program and Digital Equity Act represent significant and generational investments in broadband deployment and opportunity, they are finite funds. As the Plan states, given Minnesota's expansive geography and unique deployment challenges, funds available for digital equity activities will be stretched even thinner. That underscores how essential partnerships will be to this process, in choosing deployment partners that have a proven track record of success and significant expertise in network deployment, management, continued reinvestments,

and ongoing innovation, and also in understanding the importance of digital equity efforts to the meaningful use and adoption of newly deployed networks. Private sector investments and commitment to digital equity will be paramount to the overall success of the State's goals for broadband deployment and digital opportunity - Connect People to People, Connect People to Information, and Connect People to Resources. Communities win when the public, private, and non-profit sectors work together to accomplish shared goals.

Comcast offers these comments to the Draft Plan in the spirit of continued partnership and looks forward to continuing this critical work to close Minnesota's digital divide.

Comcast Has Invested Significantly in Minnesotan Connectivity

Comcast is a strong supporter of broadband deployment and adoption initiatives in Minnesota and stands ready to further support the State's efforts. Comcast continues to invest heavily in the State, with investments during the past three years totaling $1.4 billion, including $473 million toward technology and infrastructure investments like Internet network upgrades. 1.3 million Minnesota homes and businesses have access to Xfinity Internet and Comcast Business products and services, including speeds of 1.2 gigabits or more. Comcast's investments serve as force multipliers for public funding, including over $10 million in grants from Minnesota's Border-to-Border Broadband Development Grant Program and American Rescue Plan Act funds, serving over 3,000 new locations. Over the past three years, Comcast has added and upgraded nearly 10,000 miles of our network to connect homes and businesses across the United States, including Minnesota, with plans to bring its next generation 10G network throughout the State. This growth is all part of the more than $20 billion investment Comcast made nationwide from 2018 to 2022 in our networks, which now cover more than 60 million U.S. homes and businesses. Given Comcast's long and proven track record of success expanding broadband access and adoption in Minnesota, Comcast stands ready to partner with the State in its digital equity efforts through a variety of existing programs.

Internet Essentials

The Plan provides a three-legged stool metaphor, signifying different elements of digital access, including access to Internet service, access to an Internet-enabled device, and relevant digital skills. These are the foundation for Comcast's Internet Essentials ("IE").

IE is the largest and most successful broadband adoption initiative in the industry, connecting more than 10 million Americans to broadband Internet at home since launching in 2011. IE is designed to be a wrap-around solution that addresses the main barriers to broadband adoption. IE provides subscribers with access to broadband service at speeds of 50/10

Mbps for $9.95 per month or 100/20 Mbps for $29.95 per month (for IE Plus), access to millions of Xfinity WiFi hotspots, a wireless gateway at no additional cost, the ability to obtain low-cost or no-cost computers, unlimited data, and free digital skills training. Notably, while the IE price of $9.95 per month has remained steady since the program launched, speeds for that service have increased seven times, including more than doubling during the early days of the pandemic. Recognizing the critical need for Internet-ready devices in addition to a broadband connection, Comcast has distributed more than 200,000 free and subsidized laptops. The IE program has been designed to eliminate barriers for financially constrained households and help more families benefit from home Internet access. To become an IE customer, there is no credit check required, no term contract requirement, and customers who do not have a social security number (or prefer not to provide their social security number) may provide other forms of identification to apply.

• Since 2011, 416,000 low-income Minnesota residents in 104,000 homes have connected to the Internet through IE.

• The top cities for IE connections include Minneapolis, Saint Paul, Brooklyn Park, Bloomington, and Burnsville, and the top counties include Hennepin, Ramsey, Anoka, Dakota, and Washington.

We have recognized that offering IE is not sufficient if there is no awareness of the program. Comcast, therefore, has spent significant effort identifying effective ways to get IE information into the community. For example, we have identified partnerships for direct IE mailers, such as the Minneapolis Public Housing Authority to mail IE information to more than 6,000 residents; Tickets for Kids to promote IE to 330+ schools and social service agencies; and Greater Twin Cities United Way to provide IE materials to over 100 partner agencies to include as a backpack stuffer during Back-to-School activities. In addition, we partnered with Stairstep Foundation's His Works United initiative to support more than 10 IE ambassadors in local congregations. We have worked with Minneapolis neighborhood organizations to place IE information in local neighborhood newsletters and identified diverse media publications in which to place IE advertisements such as the Minnesota Spokesman-Recorder, Insight News, Mshale, Sahan Journal, Latino American Today, KMOJ, La Raza Radio, and more. We have also held numerous sign-up and awareness events, including for seniors living in low-income housing, St. Paul Public Schools, and Hmongtown Marketplace, in order to answer questions, assist in real time, and meet people where they are.

Comcast/Xfinity proudly participates in ACP with all tiers of Internet service the company offers, including two tiers (IE and IE Plus) that are fully covered by the $30 ACP benefit. As the Draft Plan notes, a Digital Connection Committee, spearheaded by African Community Senior Services, reported that approximately half of their clients used their ACP benefit, with many selecting IE Plus. Beyond connectivity, we work with

tens of thousands of partners across the country, including nonprofits and city leaders, to support digital skills training to improve economic mobility. We offer free training through our IE Learning Center, which features hundreds of modules on Internet basics, online safety, digital skills for everyday life, and advanced skill-building. The content is curated from partners like Common Sense Media, Goodwill, CNBC, Women in Sports Technology, and more. In addition, Comcast has partnered with several experts, including ConnectSafely, Older Adults Technology Services ("OATS"), and Council for Opportunity in Education, to develop printed digital skills curricula that are distributed to thousands of community partners free of cost. These include several online safety toolkits for seniors and students, discussion guides for parents, and our Jurassic World STEAM curricula. Comcast has long invested in nonprofit partners focused on digital skills via the Comcast NBCUniversal Foundation to help provide skills-building, job training, and other career development offerings for the full spectrum of learners, from elementary, middle and high school students to adults. Locally, these organizations include The Sanneh Foundation to expose young people to STEM basics for career exploration; Neighborhood House to teach basic skills to English Language Learners seeking economic mobility; Summit Academy OIC to train youth as digital navigators for local community members; New Vision Foundation to provide coding training and certifications for immigrant youth; and Phyllis Wheatley Community Center to provide nationally-recognized training programs such as Girls Who Code and ManCode to racially-diverse youth.

According to a recent study "Wired and Hired: Employment Effects of Subsidized Broadband Internet for Low-Income Americans" published in the American Economic Journal, IE customers make an average of $1,385 more per year and are 8 percent more likely to be employed than those eligible for but not connected through IE.

Digital Equity Challenges and Opportunities

Barriers to Broadband Adoption. Both longitudinal research and empirical evidence demonstrate that the primary barriers to broadband adoption extend beyond affordability and include perceived relevance and digital readiness, among others:

Perceived Relevance. A significant population of Americans who have not yet adopted home broadband do not recognize the relevance of such connectivity. The National Urban League ("NUL") Lewis Latimer Plan explains that perceived relevance may be tied to a lack of awareness and understanding of the Internet's uses and capabilities, in addition to the necessary skills needed to use it. NTIA's Internet Use Survey data showed that 58 percent of the 21 million offline households indicated no interest in or need to be online. Moreover, a 2021 Pew Research Center survey found that 71 percent of non-broadband users say that they would not be interested in an at-home broadband connection. These numbers help demonstrate why education for and outreach to the unconnected and

newly connected regarding broadband and its associated benefits is imperative for closing the digital divide.

Digital Readiness. Digital readiness is "the sum of the technical skills and cognitive skills people employ to use computers to retrieve information, interpret what they find, and judge the quality of that information" and "the ability to communicate and collaborate using the Internet." Digital readiness challenges impact different parts of people's lives, including the use of developing technologies, online educational resources, and telehealth capabilities. While the U.S. workforce has high demand for digital skills, many workers, especially workers of color and those without higher education, lack these skills.

Other Adoption Barriers. Other adoption barriers pertain to information and language, distrust, and structural issues tied to poverty. Information and language barriers may pertain to individuals determining program eligibility, parsing an application process, and setting up devices and services. Addressing language barriers is important for Comcast, which is why call center agents can help IE applicants in more than 240 languages, including American Sign Language. In addition, printed IE materials are available in 35 languages. Distrust may pertain to biases against free services and government programs, as well as uncertainty about additional costs and privacy concerns. Structural barriers may include complicated housing situations, such as recent moves or plans to relocate. Comcast recognizes that just like there is not a single solution to addressing broadband adoption, the underlying challenges are also not monolithic.

Bridging the Adoption Gap. Empirical evidence demonstrates that community outreach and engagement - by digital navigators, community-based organizations, community anchor institutions, faith-based leaders, and other trusted voices - is vital to overcoming complex adoption barriers.

To this end, Comcast has been investing for more than a decade to expand digital equity and inclusion in Minnesota, including through community outreach and engagement efforts. Project UP is our comprehensive initiative to advance digital equity and help build a future of unlimited possibilities. Backed by a $1 billion commitment to reach tens of millions of people, Project UP encompasses the programs and community partnerships across Comcast, NBCUniversal, and Sky that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers, and creators.

Project UP encompasses a number of longstanding and new initiatives in collaboration with local communities, including:

Digital Navigator Programs. Digital navigators are a powerful and proven tool to aid broadband adoption. Digital navigators are typically hired volunteers or staff from trusted community institutions, such as libraries,

social or public service agencies, and community-based organizations, and can assist users in overcoming barriers to adoption in a tailored manner. Digital navigators can address the relevance of broadband by demonstrating benefits like access to information, telehealth capabilities, and introduction to upskilling programs that serve as pathways to education, employment, and more. A recent Boston Consulting Group ("BCG") study supported by Comcast surveyed 1,500 people who have participated in programs with digital navigators and found that 65 percent of respondents were able to obtain Internet connectivity or a connected device, and 85 percent of respondents now use the Internet more frequently. The same research demonstrates that the benefits of digital navigators extend beyond individuals obtaining Internet access - almost 50 percent of respondents obtained better health care; more than 40 percent of respondents received support for essentials like food, rent, and housing; and more than one in three respondents found a new job or secured higher incomes.

Given the importance of digital navigators, Comcast has invested $11.4 million in more than 225 nonprofits to support digital navigator programs across our service areas in 2022 alone. Comcast has been instrumental in creating and supporting first of its kind digital navigator programs in Minnesota, specifically with Literacy Minnesota and Summit Academy OIC. Comcast partnered with Literacy Minnesota to provide financial and leadership support for a digital navigator training program through which other organizations can learn how to start their own programs. In addition, Comcast provided pilot funding and continues to support Summit Academy OIC's Tech Connects Program where youth are trained and employed for 12-weeks to serve as digital navigators at community events. There have been nine cohorts resulting in nearly 80 trained digital navigators at Summit Academy through this program. In addition to assisting their community members with technical needs, the trainers explain that this is the first employment experience opportunity many of these digital navigators have had. Furthermore, we recently provided a $40,000 grant to Smart North, an organization focused on digital equity. The grant is being used to start a digital navigation program at their Community Tech Hub located in South Minneapolis. Moreover, Comcast is funding an AmeriCorps Community Technology Empowerment Program member at The Sanneh Foundation, a digital navigator to expand digital literacy skill classes for youth, assist seniors in connecting with loved ones, and help community residents with job searches and applications.

Recently, we started work with our newest partner, Lead for America, under the banner of the American Connection Corps ("ACC"). Through this program, which has existing roots in Minnesota, we support AmeriCorps members for a year-long placement to become known, trusted, and active collaborators with community organizations, faith-based institutions, and public officials to advance broadband adoption and the availability of digital skills. As the ACC continues to scale and work with locally-based nonprofits, these efforts will reach dozens of communities, including many

in rural areas of Minnesota and dozens of other states. The ACC program is filled with talented folks committed to improving rural America in their work with libraries, elected officials, community anchor institutions, community centers, and Internet service providers.

Additionally, investing in digital navigators will provide individuals from all racial/ethnic and educational backgrounds with the opportunity to learn more about the ways in which broadband-connected technology can be relevant to their lives from members of their own communities. Research from BCG revealed several other key findings, including that (1) trust and relationship-building are key to reaching disconnected communities; (2) familiar outreach channels are most effective at getting learners in the door; (3) one-on-one attention is often most effective, especially for learning fundamental skills; (4) resource-sharing and local coordination can minimize burdens on individual digital navigators; and (5) digital navigators are the trusted voice on the ground for understanding community needs. These solutions address the main barriers to broadband adoption, as described above, and increase digital opportunity for all Minnesotans.

Digital Skills Programs. As digital navigators play a critical role in helping members of Covered Populations overcome adoption barriers, a related component of successful digital adoption efforts is programming to help people develop digital skills once they are connected. Comcast works with organizations that provide skills building, job training, and other career development offerings for the full spectrum of learners, from high school students to adults.

A February 2023 report from the National Skills Coalition and Federal Reserve Bank of Atlanta indicated that 92 percent of jobs available today require digital or likely digital skills, yet almost one-third of U.S. workers lack opportunities to build these skills. Jobs that require even one digital skill can earn an average of 23 percent more than jobs requiring no digital skills, which translates to an increase of $8,000 in annual income. Developing these digital skills is not only a value add for individual workers, especially for workers of color, but a benefit to the larger U.S. economy.

Comcast supports digital exploration initiatives that teach individuals the basic skills needed to increase competency and confidence in using technology, spark interest in technology careers, and prepare individuals for the jobs of the future through early exposure to technology fields, in-school and after-school programming, technology and computer science programs, and soft skills training. This includes the Phyllis Wheatley Community Center where Comcast supports the DigitalTechWorks Academy to train adults on basic technology skills and youth on coding and E-Sports. In addition, Comcast partners with New Vision Foundation to provide 12-week courses and industry certifications in coding and other Information Technology competencies.

Lift Zones. Comcast, together with nonprofit partners and city leaders, has

created more than 1,250 Lift Zones in community centers nationwide, including 116 Lift Zones in Minnesota. In fact, the very first and the 1,000th Lift Zone milestones were reached in Minnesota. The first Lift Zone was installed at The Sanneh Foundation's Conway Community Center, which is a thriving public space that offers free youth programming and meals to kids in the community. Comcast's 1,000th Lift Zone was at The Sanneh Foundation's Seton Center, which focuses specifically on older youth to assist with career readiness and workforce development.

Another example of the power of Lift Zones is through Comcast's partnership with Minneapolis Parks and Recreation. In 2021, Comcast installed over 40 Lift Zones in the City's community centers located in neighborhoods throughout Minneapolis that serve as a hub for activities and events. Comcast also donated over 200 laptops to Minneapolis Parks and Recreation to provide to families, or to use in their computer rooms throughout these community centers.
Along with free Internet connectivity, Lift Zones offer hundreds of hours of free educational and digital skills content. Not only are 50 percent of low-income households in major Comcast markets within walking distance of a Lift Zone, 40 percent of users report that they would not have had Internet access without the Lift Zone, and 58 percent report that the Lift Zone reduces stress for studying, working remotely, and managing online tasks.

Internet Essentials Partnership Program. In addition to IE, the Internet Essentials Partnership Program ("IEPP") is designed to help accelerate Internet adoption and provides the opportunity for school districts and other organizations to fund and quickly connect large numbers of students and families to broadband access. St. Paul Public Schools, Hennepin County, Minneapolis College, Anoka-Hennepin School District, and Northside Achievement Zone are a few of Comcast's IEPP partners in Minnesota.

ACP Support. Among other significant investments in affordability initiatives, Comcast is committed to promoting ACP. Comcast has supported and/or co-hosted nearly 900 ACP sign-up events nationwide since October 2022, resulting in thousands of ACP enrollments. These events have taken place at senior centers, back-to-school fairs, public housing facilities, festivals, fiestas, and parks. In Minnesota, Comcast has partnered with Tickets for Kids to distribute ACP materials to nearly 400 social service agencies and schools and with Greater Twin Cities United Way to provide their 110 partner agencies with materials for Back-to-School backpacks.

As the Draft Plan also acknowledges, a large share of Minnesota's cultural communities today come from other parts of the globe, and therefore language barriers continue to be a challenge As a result, Comcast has translated ACP information into over 30 different languages that we provide at no cost to our community partners for the populations that they serve. In addition, Comcast used local employees that were proficient in certain

languages to create videos with basic information on the ACP program, including sign-up instructions. These local ACP videos were created in Korean, American Sign Language, English, Urdu, Punjabi, Hmong (Green), Hmong (White), Spanish, French, Hindi, and Russian. These videos are provided to our local partners and shared with their members.

Other Initiatives: Accessibility. Comcast remains focused on helping members of Covered Populations, including individuals over age 60 and those with disabilities. Comcast partners with organizations such as Al Maa'uun and Gifts for Seniors to provide digital navigation services specifically for homebound seniors. Al Maa'uun has incorporated ACP and digital skills materials into their Meals on Wheels program, and Gifts for Seniors has hired a digital navigator to assist seniors with getting online and accessing telehealth resources. In addition, the Comcast NBCUniversal Foundation recently awarded a $1.3 million two-year grant to Easterseals to expand digital literacy training for young adults with disabilities enrolled in Easterseals employment programs. Students with intellectual and/or developmental disabilities ages 16 to 24 will be trained on how to navigate the Internet, communicate through email, create PowerPoint presentations, prepare resumes, use assistive technology, and more.

Final Thoughts

Comcast encourages Minnesota to focus on digital equity efforts that will be the most impactful, including digital navigators, digital skills training programs, and partnerships. Comcast believes that partnerships are paramount to advancing digital equity efforts because closing the digital divide starts at the local level by meeting people where they are and responding to their specific needs. Communities win when the private sector, government, and community organizations join forces to achieve shared goals. To that end, Minnesota should create an inclusive framework that allows many organizations to participate directly in grant programs and that fosters such participation through partnerships and coalitions. As Comcast's more than a decade of dedicated digital adoption and community engagement efforts demonstrate, the private sector has been a critical partner in facilitating digital equity efforts to date. Minnesota's Digital Equity Act implementation should seek to amplify and scale the efforts of these existing successful relationships and ensure that the private sector continues to be a force multiplier for public funding.

Thank you again for the chance to offer our thoughts on the State's Draft Plan. Comcast looks forward to continuing to work with OBD as it refines its Digital Opportunity Plan.

Comcast Cable Communications, LLC, on behalf of its subsidiaries (together, "Comcast"), submits this letter in response to the Minnesota Draft Digital Opportunity Plan ("Draft Plan" or "Plan"). Comcast thanks the Minnesota Office of Broadband Development ("OBD") for seeking stakeholder comment and commends it for an exemplary start to achieving digital opportunity for all Minnesota residents and communities.

We applaud Minnesota's work to date, which as the Plan identifies has resulted in Minnesotans having a slightly higher rate of home internet subscriptions than the national average. We also appreciate the statement that "this is not OBD's digital opportunity plan *for* Minnesota. Rather, this plan *belongs to* Minnesota." This sets a clear tone for the task at hand, that for digital opportunity goals to be met, there needs to be a broad and shared focus and accountability to achieve success. We could not agree more – and fully subscribe to the notion that for digital opportunity efforts to make a meaningful impact, it starts by clearly articulating the critical role that public, private, and non-profit stakeholders play, as well as their shared interests in making sure these efforts are impactful.

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[1] *See Internet Essentials*, Comcast Corp., https://corporate.comcast.com/impact/digital-equity/internet-essentials (last visited Sept. 26, 2023).

[2] Recognizing the many challenges presented by the pandemic, eligible new customers received 60 days of free Internet service through IE during the pandemic. *See, e.g.*, Press Release, Comcast Corp., *Comcast Extends 60-Days of Free Internet Service to New Internet Essentials Customers* (June 18, 2020), https://corporate.comcast.com/press/releases/comcast-extends-free-internet-service-new-internet-essentials-customers.

Recognizing the critical need for Internet-ready devices in addition to a broadband connection, Comcast has distributed more than 200,000 free and subsidized laptops.[3] The IE program has been designed to eliminate barriers for financially constrained households and help more families benefit from home Internet access. To become an IE customer, there is no credit check required, no term contract requirement, and customers who do not have a social security number (or prefer not to provide their social security number) may provide other forms of identification to apply.

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[3] Comcast Corp., *Internet Essentials Progress Report* 30, https://update.comcast.com/wp-content/uploads/sites/33/dlm_uploads/2022/06/IE-ProgressReport_6-23-22.pdf.

[4] Draft Plan at 42.

[5] *Internet Essentials Learning Center*, Xfinity, https://www.xfinity.com/learn/internet-service/internet-essentials/learning (last visited Sept. 26, 2023).

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Digital Equity Challenges and Opportunities

Barriers to Broadband Adoption. Both longitudinal research and empirical evidence demonstrate that the primary barriers to broadband adoption extend beyond affordability and include perceived relevance and digital readiness, among others:[7]

Perceived Relevance. A significant population of Americans who have not yet adopted home broadband do not recognize the relevance of such connectivity. The National Urban League ("NUL") Lewis Latimer Plan explains that perceived relevance may be tied to a lack of awareness and understanding of the Internet's uses and capabilities, in addition to the necessary skills needed to use it.[8] NTIA's Internet Use Survey data showed that 58 percent of the 21 million offline households indicated no interest in or need to be online.[9] Moreover, a 2021 Pew Research Center survey found that 71 percent of non-broadband users say that they would not be

[6] George W. Zuo, *Wired and Hired: Employment Effects of Subsidized Broadband Internet for Low Income Americans*, 13 Am. Econ. J.: Econ. Pol'y 447 (Aug. 2021).

[7] *See* National Urban League, *The Lewis Latimer Plan for Digital Equity and Inclusion* 53 (2021) ("NUL Lewis Latimer Plan") (noting that "[e]xtensive public and private surveys suggest that, since 2010, there are three principal causes of the adoption gap, broadly speaking: problems of affordability, digital readiness, and perceived relevance"), https://nul.org/sites/default/files/2021-03/NUL%20LL%20DEIA%20033021%20Latimer%20Plan_vFINAL_11AM.pdf.

[8] *Id.* at 61.

[9] NTIA, *Switched Off: Why Are One in Five U.S. Households Not Online?* (Oct. 5, 2022), https://ntia.gov/blog/2022/switched-why-are-one-five-us-households-not-online.

interested in an at-home broadband connection.[10] These numbers help demonstrate why education for and outreach to the unconnected and newly connected regarding broadband and its associated benefits is imperative for closing the digital divide.

Digital Readiness. Digital readiness is "the sum of the technical skills and cognitive skills people employ to use computers to retrieve information, interpret what they find, and judge the quality of that information" and "the ability to communicate and collaborate using the Internet."[11] Digital readiness challenges impact different parts of people's lives, including the use of developing technologies, online educational resources, and telehealth capabilities.[12] While the U.S. workforce has high demand for digital skills, many workers, especially workers of color and those without higher education, lack these skills.[13]

Other Adoption Barriers. Other adoption barriers pertain to information and language, distrust, and structural issues tied to poverty. Information and language barriers may pertain to individuals determining program eligibility, parsing an application process, and setting up devices and services. Addressing language barriers is important for Comcast, which is why call center agents can help IE applicants in more than 240 languages, including American Sign Language.[14] In addition, printed IE materials are available in 35 languages.[15] Distrust may pertain to biases against free services and government programs, as well as uncertainty about additional costs and privacy concerns.[16] Structural barriers may include complicated housing situations, such as recent moves or plans to relocate.[17] Comcast recognizes that just like there is not a single solution to addressing broadband adoption, the underlying challenges are also not monolithic.

Bridging the Adoption Gap. Empirical evidence demonstrates that community outreach and engagement – by digital navigators, community-based organizations, community anchor

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[10] Andrew Perrin, *Mobile Technology and Home Broadband 2021*, Pew Research Center (June 3, 2021), https://www.pewresearch.org/internet/2021/06/03/mobile-technology-and-home-broadband-2021/.

[11] NUL Lewis Latimer Plan at 60.

[12] *Id.* at 61.

[13] Broderick Johnson, *National Skills Coalition Report: We Must Close the Digital Skill Divide*, Comcast Stories (Feb. 8, 2023), https://corporate.comcast.com/stories/national-skills-coalition-report-close-digital-skill-divide.

[14] Press Release, Comcast Corp., *Comcast Commits to Investing $1B Over Next 10 Years to Reach 50M Low-Income Americans With Tools and Resources to Succeed in Digital World* (Mar. 24, 2021), https://corporate.comcast.com/press/releases/comcasts-internet-essentials-program-hits-ten-year-mark.

[15] *See Internet Essentials Partner Portal*, Comcast Corp., https://partner.internetessentials.com/ (last visited Sept. 28, 2023).

[16] Matt Kalmus et al., Boston Consulting Group, *A Human Approach to Closing the Digital Divide* 3, 4, 8 (June 13, 2022), https://mkt-bcg-com-public-pdfs.s3.amazonaws.com/prod/how-to-close-digital-divide-with-human-approach.pdf ("June 2022 BCG Study").

[17] Chris Goodchild, et al., Boston Consulting Group, *Boosting Broadband Adoption and Remote K-12 Education in Low-Income Households* 6 (May 12, 2021), https://mkt-bcg-com-public-pdfs.s3.amazonaws.com/prod/accelerating-broadband-adoption-for-remote-education-low-income-households.pdf.

institutions, faith-based leaders, and other trusted voices – is vital to overcoming complex adoption barriers.

To this end, Comcast has been investing for more than a decade to expand digital equity and inclusion in Minnesota, including through community outreach and engagement efforts. **Project UP** is our comprehensive initiative to advance digital equity and help build a future of unlimited possibilities. Backed by a $1 billion commitment to reach tens of millions of people, Project UP encompasses the programs and community partnerships across Comcast, NBCUniversal, and Sky that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers, and creators.[18]

Project UP encompasses a number of longstanding and new initiatives in collaboration with local communities, including:

Digital Navigator Programs. Digital navigators are a powerful and proven tool to aid broadband adoption. Digital navigators are typically hired volunteers or staff from trusted community institutions, such as libraries, social or public service agencies, and community-based organizations, and can assist users in overcoming barriers to adoption in a tailored manner. Digital navigators can address the relevance of broadband by demonstrating benefits like access to information, telehealth capabilities, and introduction to upskilling programs that serve as pathways to education, employment, and more. A recent Boston Consulting Group ("BCG") study supported by Comcast surveyed 1,500 people who have participated in programs with digital navigators and found that 65 percent of respondents were able to obtain Internet connectivity or a connected device, and 85 percent of respondents now use the Internet more frequently.[19] The same research demonstrates that the benefits of digital navigators extend beyond individuals obtaining Internet access – almost 50 percent of respondents obtained better health care; more than 40 percent of respondents received support for essentials like food, rent, and housing; and more than one in three respondents found a new job or secured higher incomes.[20]

Given the importance of digital navigators, Comcast has invested $11.4 million in more than 225 nonprofits to support digital navigator programs across our service areas in 2022 alone.[21] Comcast has been instrumental in creating and supporting first of its kind digital navigator programs in Minnesota, specifically with Literacy Minnesota and Summit Academy OIC. Comcast partnered with Literacy Minnesota to provide financial and leadership support for a digital navigator training program through which other organizations can learn how to start their own programs. In addition, Comcast provided pilot funding and continues to support Summit Academy OIC's Tech Connects Program where youth are trained and employed for 12-weeks to

[18] *Project UP*, Comcast Corp., https://corporate.comcast.com/impact/project-up (last visited Sept. 26, 2023).

[19] *See* June 2022 BCG Study at 2, 15.

[20] *Id.* at 15.

[21] *See* Broderick Johnson, *ACP Week of Action: Comcast's Commitment to Affordable Connectivity for All*, Comcast Stories (June 14, 2023), https://corporate.comcast.com/stories/acp-week-of-action-comcast-commitment-affordable-connectivity-for-all.

serve as digital navigators at community events. There have been nine cohorts resulting in nearly 80 trained digital navigators at Summit Academy through this program. In addition to assisting their community members with technical needs, the trainers explain that this is the first employment experience opportunity many of these digital navigators have had. Furthermore, we recently provided a $40,000 grant to Smart North, an organization focused on digital equity. The grant is being used to start a digital navigation program at their Community Tech Hub located in South Minneapolis. Moreover, Comcast is funding an AmeriCorps Community Technology Empowerment Program member at The Sanneh Foundation, a digital navigator to expand digital literacy skill classes for youth, assist seniors in connecting with loved ones, and help community residents with job searches and applications.[22]

Recently, we started work with our newest partner, Lead for America, under the banner of the American Connection Corps ("ACC"). Through this program, which has existing roots in Minnesota, we support AmeriCorps members for a year-long placement to become known, trusted, and active collaborators with community organizations, faith-based institutions, and public officials to advance broadband adoption and the availability of digital skills. As the ACC continues to scale and work with locally-based nonprofits, these efforts will reach dozens of communities, including many in rural areas of Minnesota and dozens of other states. The ACC program is filled with talented folks committed to improving rural America in their work with libraries, elected officials, community anchor institutions, community centers, and Internet service providers.

Additionally, investing in digital navigators will provide individuals from all racial/ethnic and educational backgrounds with the opportunity to learn more about the ways in which broadband-connected technology can be relevant to their lives from members of their own communities. Research from BCG revealed several other key findings, including that (1) trust and relationship-building are key to reaching disconnected communities; (2) familiar outreach channels are most effective at getting learners in the door; (3) one-on-one attention is often most effective, especially for learning fundamental skills; (4) resource-sharing and local coordination can minimize burdens on individual digital navigators; and (5) digital navigators are the trusted voice on the ground for understanding community needs.[23] These solutions address the main barriers to broadband adoption, as described above, and increase digital opportunity for all Minnesotans.

Digital Skills Programs. As digital navigators play a critical role in helping members of Covered Populations[24] overcome adoption barriers, a related component of successful digital adoption

[22] Broderick Johnson, *Rebuilding After Fire to Keep a Community Connected*, Comcast Stories (Mar. 14, 2023), https://corporate.comcast.com/stories/comcast-revisits-its-very-first-wifi-connected-lift-zone.

[23] June 2022 BCG Study at 22-23.

[24] The Digital Equity Act defines "Covered Populations" to include (1) individuals who live in low-income households; (2) aging individuals; (3) incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility; (4) veterans; (5) individuals with disabilities; (6) individuals with a language barrier, including individuals who are English learners and have low levels of literacy; (7) racial and ethnic minorities; and (8) rural inhabitants. *See* NTIA, Digital Equity Act of 2021; Request for Comment, 88 Fed. Reg. 13101, 13102 (Mar. 2, 2023).

efforts is programming to help people develop digital skills once they are connected. Comcast works with organizations that provide skills building, job training, and other career development offerings for the full spectrum of learners, from high school students to adults.

A February 2023 report from the National Skills Coalition and Federal Reserve Bank of Atlanta indicated that 92 percent of jobs available today require digital or likely digital skills, yet almost one-third of U.S. workers lack opportunities to build these skills.[25] Jobs that require even one digital skill can earn an average of 23 percent more than jobs requiring no digital skills, which translates to an increase of $8,000 in annual income.[26] Developing these digital skills is not only a value add for individual workers, especially for workers of color, but a benefit to the larger U.S. economy.

Comcast supports digital exploration initiatives that teach individuals the basic skills needed to increase competency and confidence in using technology, spark interest in technology careers, and prepare individuals for the jobs of the future through early exposure to technology fields, in-school and after-school programming, technology and computer science programs, and soft skills training. This includes the Phyllis Wheatley Community Center where Comcast supports the DigitalTechWorks Academy to train adults on basic technology skills and youth on coding and E-Sports. In addition, Comcast partners with New Vision Foundation to provide 12-week courses and industry certifications in coding and other Information Technology competencies.

Lift Zones. Comcast, together with nonprofit partners and city leaders, has created more than 1,250 Lift Zones in community centers nationwide, including 116 Lift Zones in Minnesota. In fact, the very first and the 1,000th Lift Zone milestones were reached in Minnesota. The first Lift Zone was installed at The Sanneh Foundation's Conway Community Center, which is a thriving public space that offers free youth programming and meals to kids in the community.[27] Comcast's 1,000th Lift Zone was at The Sanneh Foundation's Seton Center, which focuses specifically on older youth to assist with career readiness and workforce development. [28]

Another example of the power of Lift Zones is through Comcast's partnership with Minneapolis Parks and Recreation. In 2021, Comcast installed over 40 Lift Zones in the City's community centers located in neighborhoods throughout Minneapolis that serve as a hub for activities and

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[25] Broderick Johnson, *National Skills Coalition Report: We Must Close the Digital Skill Divide*, Comcast Stories (Feb. 8, 2023), https://corporate.comcast.com/stories/national-skills-coalition-report-close-digital-skill-divide.

[26] *Id.*

[27] Broderick Johnson, *Rebuilding After Fire to Keep a Community Connected*, Comcast Stories (Mar. 14, 2023), https://corporate.comcast.com/stories/comcast-revisits-its-very-first-wifi-connected-lift-zone.

[28] Press Release, Comcast Corp., *Comcast Expands Digital Equity Efforts: Installs Free WiFi at 1,000th Lift Zone Community Center* (Dec. 15, 2021), https://corporate.comcast.com/press/releases/comcast-expands-digital-equity-efforts.

events. Comcast also donated over 200 laptops to Minneapolis Parks and Recreation to provide to families, or to use in their computer rooms throughout these community centers.

Along with free Internet connectivity, Lift Zones offer hundreds of hours of free educational and digital skills content. Not only are 50 percent of low-income households in major Comcast markets within walking distance of a Lift Zone, 40 percent of users report that they would not have had Internet access without the Lift Zone, and 58 percent report that the Lift Zone reduces stress for studying, working remotely, and managing online tasks.

Internet Essentials Partnership Program. In addition to IE, the Internet Essentials Partnership Program ("IEPP") is designed to help accelerate Internet adoption and provides the opportunity for school districts and other organizations to fund and quickly connect large numbers of students and families to broadband access. St. Paul Public Schools, Hennepin County, Minneapolis College, Anoka-Hennepin School District, and Northside Achievement Zone are a few of Comcast's IEPP partners in Minnesota.

ACP Support. Among other significant investments in affordability initiatives, Comcast is committed to promoting ACP. Comcast has supported and/or co-hosted nearly 900 ACP sign-up events nationwide since October 2022, resulting in thousands of ACP enrollments. These events have taken place at senior centers, back-to-school fairs, public housing facilities, festivals, fiestas, and parks. In Minnesota, Comcast has partnered with Tickets for Kids to distribute ACP materials to nearly 400 social service agencies and schools and with Greater Twin Cities United Way to provide their 110 partner agencies with materials for Back-to-School backpacks.

As the Draft Plan also acknowledges, a large share of Minnesota's cultural communities today come from other parts of the globe, and therefore language barriers continue to be a challenge As a result, Comcast has translated ACP information into over 30 different languages that we provide at no cost to our community partners for the populations that they serve. In addition, Comcast used local employees that were proficient in certain languages to create videos with basic information on the ACP program, including sign-up instructions. These local ACP videos were created in Korean, American Sign Language, English, Urdu, Punjabi, Hmong (Green), Hmong (White), Spanish, French, Hindi, and Russian. These videos are provided to our local partners and shared with their members.

Other Initiatives: Accessibility. Comcast remains focused on helping members of Covered Populations, including individuals over age 60 and those with disabilities. Comcast partners with organizations such as Al Maa'uun and Gifts for Seniors to provide digital navigation services specifically for homebound seniors. Al Maa'uun has incorporated ACP and digital skills materials into their Meals on Wheels program, and Gifts for Seniors has hired a digital navigator to assist seniors with getting online and accessing telehealth resources. In addition, the Comcast NBCUniversal Foundation recently awarded a $1.3 million two-year grant to Easterseals to expand digital literacy training for young adults with disabilities enrolled in

Easterseals employment programs.[29] Students with intellectual and/or developmental disabilities ages 16 to 24 will be trained on how to navigate the Internet, communicate through email, create PowerPoint presentations, prepare resumes, use assistive technology, and more.[30]

Final Thoughts

Comcast encourages Minnesota to focus on digital equity efforts that will be the most impactful, including digital navigators, digital skills training programs, and partnerships. Comcast believes that partnerships are paramount to advancing digital equity efforts because closing the digital divide starts at the local level by meeting people where they are and responding to their specific needs. Communities win when the private sector, government, and community organizations join forces to achieve shared goals. To that end, Minnesota should create an inclusive framework that allows many organizations to participate directly in grant programs and that fosters such participation through partnerships and coalitions. As Comcast's more than a decade of dedicated digital adoption and community engagement efforts demonstrate, the private sector has been a critical partner in facilitating digital equity efforts to date. Minnesota's Digital Equity Act implementation should seek to amplify and scale the efforts of these existing successful relationships and ensure that the private sector continues to be a force multiplier for public funding.

Thank you again for the chance to offer our thoughts on the State's Draft Plan. Comcast looks forward to continuing to work with OBD as it refines its Digital Opportunity Plan.

[29] Press Release, Easterseals, *Easterseals Announces Two-Year Grant of $1.3M From the Comcast NBCUniversal Foundation* (June 7, 2023), https://www.easterseals.com/news-and-stories/press-releases/easterseals-announces-2.html

[30] *Id.*

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Blandin Foundation
Email	jsdavid@blandinfoundation.org
Zipcode	55744
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	5.1.1 - Minnesota's Existing Digital Strengths Consider including https://www.connectedmn.us/ as a resource for digital access and use 5.2.2 - Unsupported Digital Necessities in Rural Areas Advocates and Educators Facing Limited Capacity (p 40) Revise Blandin Broadband Communities Program paragraph: For decades, the Blandin Broadband Communities Program supported dozens of Greater Minnesota cities, counties, and tribes in advancing community-identified technology goals, which leave a legacy of a local leaders who know how to organize for improved technology and a higher understanding and appreciation for broadband especially for residents in rural areas.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+ People from Minoritized Racial/Ethnic Groups People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Michael Abensour
Email	michael.abensour@compudopt.org
Zipcode	77009
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	My name is Michael Abensour and I am the Chief Impact Officer for Compudopt, a national 501c3 nonprofit whose mission is to to provide technology access and education to under-resourced youth and their communities. We have been working in the digital inclusion space for over 15 years, and while we originally began as a nonprofit computer refurbisher, we have since expanded into offering a suite of holistic digital inclusion programs that provide an end-to-end set of solutions to overcome the digital divide. Not only have we given tens of thousands of refurbished devices to families, but we also provide digital literacy skill building classes to adults, afterschool STEM programs to youth, as well as connectivity solutions (our own 5G fixed wireless network as well as ACP enrollment) to communities across the country. We applaud Minnesota's Digital Opportunity Plan for its attention to measurable, achievable goals for Minnesotans on the wrong side of the digital divide, especially the goal of achieving 95% device coverage by 2028. We believe devices are the bedrock of any sustainable digital inclusion program, and we offer our assistance to the State of Minnesota in achieving that milestone.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	6: Areas of Alignment

Comment regarding the Digital Opportunity Plan	Your implementation plan rightfully lays out a detailed plan and roadmap for collaboration and stakeholder participation. While Compudopt does not have a physical presence in Minnesota, we consistently offer programming wherever the need is, be it rural/urban/suburban regardless of whether we have ever operated in a particular geography before. Our programs have been designed from the ground up to be scalable, deliverable and affordable. As you implement your various equity and best practice groups around your goals, please keep Compudopt in consideration for partnership and collaboration on areas that overlap with our core strengths: device distributions, digital literacy training, STEM enrichment programs, tech support, Digital Navigation programs, and connectivity.
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas People from Minoritized Racial/Ethnic Groups People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	The City of Saint Paul
Email	drew.nelson@ci.stpaul.mn.us
Zipcode	55102
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan

Bree Maki, Director of Office of Broadband Development,

The City of Saint Paul, anchored in Mayor Carter's pillars of economic justice, education, equity, innovation, and resiliency, is committed to achieving full digital inclusion for all residents. We believe that in a city that truly works for everyone, everyone should have unfettered opportunities to work, learn, and access services, regardless of their digital proficiency or the resources at their disposal. In our quest for an equitable distribution of digital resources, collaboration has been key. It's in this collaborative spirit that the "Connectivity Blueprint" was launched in partnership with Ramsey County.

Connectivity Blueprint

Digital inclusion is not merely an infrastructure challenge but is fundamentally tied to an equitable future. The City of Saint Paul and Ramsey County, despite having extensive broadband infrastructure, still grapple with pervasive digital disparities. Alarmingly, those facing these disparities often belong to communities historically marginalized in broader economic contexts. The lessons of the pandemic underscore the vital nature of digital access, and while federal and state policies are rapidly evolving to address these gaps, their efficacy will be determined by their ability to address the nuanced challenges of our diverse communities.

Residents' needs revolve around obtaining and maintaining connectivity, as well as maximizing its utility. As states, including Minnesota, start to develop comprehensive digital equity strategies, it is imperative to craft these plans with the lived experiences of our most vulnerable populations at the forefront. The Connectivity Blueprint, crafted in collaboration with local leaders, articulates recommendations pivotal to this cause. Notably, as we approach a wave of substantial federal investments in digital infrastructure, the emphasis should not merely be on physical connectivity but should prioritize genuine digital equity. This entails a multi-faceted approach: heightened public awareness campaigns, bolstering existing local programs, optimizing federal funding towards genuine digital equity, and advancing policies that ensure universal internet accessibility and affordability. Through these concerted efforts, we can transform digital inclusion from aspiration to reality.

The report is available at https://www.ramseycounty.us/your-government/projects-initiatives/ramsey-connected-computer-internet-resources/connectivity-blueprint. The report touches on many of the areas highlighted in the Office of Broadband Development's Digital Opportunity Plan, and underscores the urgency of getting connected, staying connected, and learning how to use the connection for many in Saint Paul.

About Saint Paul

Saint Paul is a vibrant and diverse city that is comprised of people from many groups directly experiencing challenges with digital connectivity and accessibility: older adults, people of color, veterans, people with disabilities, individuals re-entering society from incarceration, individuals experiencing language barriers, low-income individuals, immigrant and refugee communities, renters and those in multi-family properties, and more. Recognizing this, our strategy to broaden digital opportunities is anchored in the lived experiences and insights of our constituents and neighbors. By centering their voices, we aim to foster greater access and economic justice in an ever-evolving digital economy.
Community Partnerships

We've also chosen to partner with local organizations and other governments whose mission aligns with ours. We have done this through:
• St. Paul Promise Neighborhood
• Hallie Q. Brown
• CLUES
• Saint Paul Chamber
• Saint Paul College
• Saint Paul Public Library
• Ramsey County Opportunity Center
• Dorothy Day Shelter
• Ramsey County Department of Corrections
• Neighborhood House

In alignment with our partners throughout Saint Paul, the Metro area, and Minnesota, we believe policy change is core to addressing many of these issues. We appreciate an acknowledgement about systematic policy issues that may be outside the scope of this plan, and we believe there is broad agreement that without policy change, our broader goals of expanded digital equity and opportunity will ultimately be unreachable.

Our Feedback: Utilize Existing Infrastructure for Digital Equity that is Inclusive of Urban Communities

Our feedback emphasizes the crucial role of partnership and policy in enhancing the impact of this plan across identified groups in Minnesota. While the current plan prioritizes non-competitive grants for areas outside urban centers, it overlooks the dense populations of these groups residing within cities like Saint Paul and other urban communities. By doing so, it misses opportunities to amplify the effects of existing programs and partnerships. The state's draft plan necessitates the creation of additional administrative layers outside these existing partnerships, leading to duplicated services without genuinely extending reach into the communities most in need.

Leveraging and centralizing resources in established service centers, such as libraries and community centers, allows for streamlined, layered service during a single visit, creating a trusted and readily accessible network

between government and Non-Profit Organizations (NPOs). This approach fosters direct and indirect outreach to impacted groups and avoids the unnecessary time and cost involved in creating additional service providers. This direct accessibility and familiarity enhance agility and responsiveness to the dynamic needs of these populations, facilitated by culturally familiar professionals.

For impactful and lasting change in bridging the digital divide and expanding digital opportunity, local policies and existing administrative functions play a crucial role, especially when one-time federal funds are depleted. We advocate for the state to allocate funding efficiently by enhancing proven programs within existing organizations to meet the prevalent challenges across Minnesota, focusing on local regulations and needs, ensuring the sustainability and effectiveness of digital equity initiatives.

Thank you, and a copy of this feedback has been mailed as well and this feedback is pertinent to multiple sections of the plan.

Drew Nelson
Deputy Director, Office of Technology and Communications, City of Saint Paul
Co-chair, Ramsey County and Saint Paul's Connectivity Blueprint

Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+ People from Minoritized Racial/Ethnic Groups Veterans People with Disabilities People who are Incarcerated or Re-Entering Society People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Don Frederiksen
Email	don@seniortechclub.com
Zipcode	55418
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation

Comment regarding the Digital Opportunity Plan	At a high level, I found the Opportunity Plan draft a remarkable document. Having actively participated in the Gifts for Senior's DCC and having interacted with Hannah, I am in simply in awe. This is an awesome effort. Thank you for the dedication, breadth and focus. On the implementation, from my perspective of working with a small organization like Gifts for Seniors as it looks to expand its program, it is so clear that the following statement from the draft plan is critical. "OBD aims to continue prioritizing authenticity, cooperation, and relationship-building while implementing this plan." Smaller organizations cannot do it all. The four activities as identified in section 6.2.3 of the draft seem out of reach for a single organization. Small organizations must seek to collaborate with other resources. But as necessary that collaboration is, it is also time and energy consuming. It also requires visibility to the capabilities and mission of possible collaborators. Knowing who else is working in a relevant area seems like a simple question but is can be difficult to answer at a local level. With this backdrop, I hope that special provisions are built into the implemention plan that supports the easy and open sharing of resources. I don't have many specific ideas but my thinking might include funding for Senior LinkAge types of resources that focus on helping organizations collaborate to achieve the Opportunity mission. If there are competitive grant programs, perhaps special consideration is given to organizations that seek to collaborate. The draft plan definitely talks about the need for collaboration and I propose that it is important the the final plan look to support collaboration between DCC's and other resources across the state. Collaboration is so key to our shared success.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Ameelio
Email	nick@ameelio.org
Zipcode	23235
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	1: Introduction
Comment regarding the Digital Opportunity Plan	Ameelio commends Minnesota's Office of Broadband Development (OBD) for opening up this plan with the following quote: "I think everyone should have equal access to internet connectivity. It's an essential part of life in this day and age, and not having internet really inhibits opportunities for people." As the only non-profit provider of both communication and education technology in the correctional industry, we firmly believe that access to technology is fundamental to the successful rehabilitation of incarcerated individuals. To that end, we strongly support the inclusion of incarcerated individuals as a covered population under the Digital Equity Act, as well as OBD's decision to include several specific sections throughout this report dedicated to advancing equity for them.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	2: Planning Process: The Minnesota Model

Comment regarding the Digital Opportunity Plan	While we understand that both the formal survey period and public comment period has ended, we would recommend that going forward, to the extent possible, OBD consider ways to solicit feedback from both currently incarcerated individuals, and recently released individuals, to inform the planning process for a final draft. This is particularly important, given their status as a covered population under the Digital Equity Act. One potential option is to facilitate the formation of a Digital Connection Committee (DCC) made up of incarcerated individuals. These individuals would obviously be significantly limited in their ability to meet and document their findings in any sort of consistent manner, but one possibility is for OBD to coordinate with the Minnesota Department of Correction (MNDOC) to support the formation of a limited number of DCCs across the state.

Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	4: Goals
Comment regarding the Digital Opportunity Plan	Ameelio commends the inclusion of formerly incarcerated people in Goal 3.3.1, which aims "to ensure formerly incarcerated Minnesotans who are re-entering society receive full reentry support connecting them to digital technologies when legally permissible." However, we believe it is vital that currently incarcerated individuals are also included in such a goal, and recommend the goal be amended to include both "formerly and currently incarcerated Minnesotans".
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	3: The Current State of Digital Opportunity

Comment regarding the Digital Opportunity Plan

We wholeheartedly agree with the statement in Section 5.7 that "People who are incarcerated must essentially put their technology skills on hold during their detainment." We believe it is essential for a successful reentry that incarcerated people are allowed access to modern technologies during their incarceration, rather than after. This is especially true when it comes to finding gainful employment, given the vital role that technology now plays in not just our day-to-day work lives, but also in the job search and application process.

In Section 5.7.2 (Unsupported Digital Necessities for People Who are Incarcerated or Re-Entering Society), we suggest adding an additional section on the topic of Network Infrastructure and Access in Correctional Facilities. Unlike most of us, who have a choice over network providers, internet speed, and security setup, incarcerated individuals are often subject to outdated network infrastructure. Many correctional facilities today still rely on decades-old wiring, with download speeds as low as 10 Mbps. Compare that with the ones in most modern internet plans, which support 1,000 Mbps speed.

Insufficient network speeds can result in low-quality video calling and voice calling solutions, hindering the ability for incarcerated individuals to access digital resources, including video calling, voice calling, and educational programming. This can manifest in dropped calls or slow download speeds of educational videos. In a survey conducted in California, 97 percent of family members who have incarcerated loved ones in state prisons (currently contracts with ViaPath for service) have regular connectivity issues. The issue is particularly impactful for tablet-based communications. Users are reporting that about 70 percent of the calls "go silent at one point or just hang up." (Source: Empowering Women Impacted by Incarceration (EWII), CDCR/ViaPath Communication Challenges Survey, 2023.)

Outdated network infrastructure in correctional facilities further limits the extent to which incarcerated individuals can access and engage with modern digital technologies, including educational resources, the vast majority of which are available exclusively online. (Source: Moraff, Christopher. July 9, 2016. Digitizing the 21st-Century Prison. Next City.)

Further complicating the problem of inadequate network infrastructure is the manner in which prisons and jails contract out for their network infrastructure. In many cases, these facilities do not own, but instead lease their network maintenance, equipment and assessment. This is particularly prevalent among county jails, where facilities are often faced with steep budget shortfalls. This lack of ownership results in a lack of competition, control and oversight, placing them in the undesirable position of needing to either procure another vendor to install a new network at the end of the current contract, or continue contracting with the existing vendor. This lack of competition then contributes to the low-quality network services already prevalent in most prisons and jails.

Prisons and jails are further incentivized to adhere to this leasing model thanks to the practice of for-profit companies offering to provide the networks "at no cost" to the agency. Instead, these companies subsidize the cost of providing this network equipment using the revenue generated from the phone calls and video calls made by incarcerated individuals. In doing so, incarcerated individuals are forced to subsidize the very networks that are often leading to inadequate services.

We suggest that the plan recommended correctional facilities pursue ownership over their networks, rather than contract it out to third parties. It is more advantageous for DOCs to own their network infrastructure, as this grants a higher level of independence and control over their operations, allowing them to tailor their network infrastructure to meet their specific needs, ensuring seamless communication, data management, cybersecurity practices, and information flow within the correctional system. This not only improves overall efficiency but also enables agencies to adapt swiftly to changing circumstances and emerging technologies.

In the final bullet of Section 5.7.3 (Systemic Challenges Impeding Digital Opportunity for People Who are Incarcerated or Re-Entering Society), the plan points out that "people who have been incarcerated experience lower rates of recidivism when they have comprehensive access to mental healthcare, educational opportunities, and career training during their prison sentence and following their release." We wholeheartedly agree with this statement, but would suggest also including access to "communication with friends and family" in that list of resources.

Digital equity efforts within correctional facilities can greatly enhance opportunities for communication between incarcerated individuals and their families. Access to email, video calls, and virtual visitations can foster healthy relationships, support mental well-being, and contribute to smoother reintegration processes post-release. Improved communication with families can also lead to better post-release outcomes. A research study published in the Journal of Offender Rehabilitation revealed that strong family connections reduced the likelihood of recidivism by 22 percent. (Source: The Importance of Family Support for Incarcerated Individuals: A Comparative Study of Perceived Social Support. 2018. Journal of Offender Rehabilitation.) Many studies have pointed to the positive effect of visitation, both in-person and virtual, on an individuals' likelihood to recidivate. (Source: Wang, Leah. December 21, 2021. Research roundup: The positive impacts of family contact for incarcerated people and their families. Prison Policy Initiative.)
In a study by MNDOC, it was found that inmates who maintain regular communication with their families are 13 percent less likely to be involved in disciplinary incidents within the correctional facility. (Source: Reentry Guide: For People Returning to Minnesota Communities from Correctional Facilities. 2020. Minnesota Department of Corrections). And with

Minnesota's recent decision to make phone calls free, with video calls potentially free in some facilities, ensuring facilities have sufficient bandwidth and technology to support this expansion in communication is vital.

Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	6: Areas of Alignment
Comment regarding the Digital Opportunity Plan	In Section 6.1.2 (Inter-Agency Digital Opportunity Workgroup), we strongly encourage that MNDOC, as well as organizations providing services for incarcerated individuals on the ground, be included in any future re-forming of the Workgroup. Given the almost complete inability for an incarcerated individual to actively participate in an OBD listening session, or the existence of any DCCs representing incarcerated individuals, the participation of these organizations in the Workgroup will be vital in ensuring that the state's final plan reflects their unique needs and challenges.


ameelio
Technology for a more rehabilitative corrections system
Forbes
The New York Times
FAST COMPANY
TC
BUSINESS INSIDER
Bloomberg
The Washington Post

Table of contents

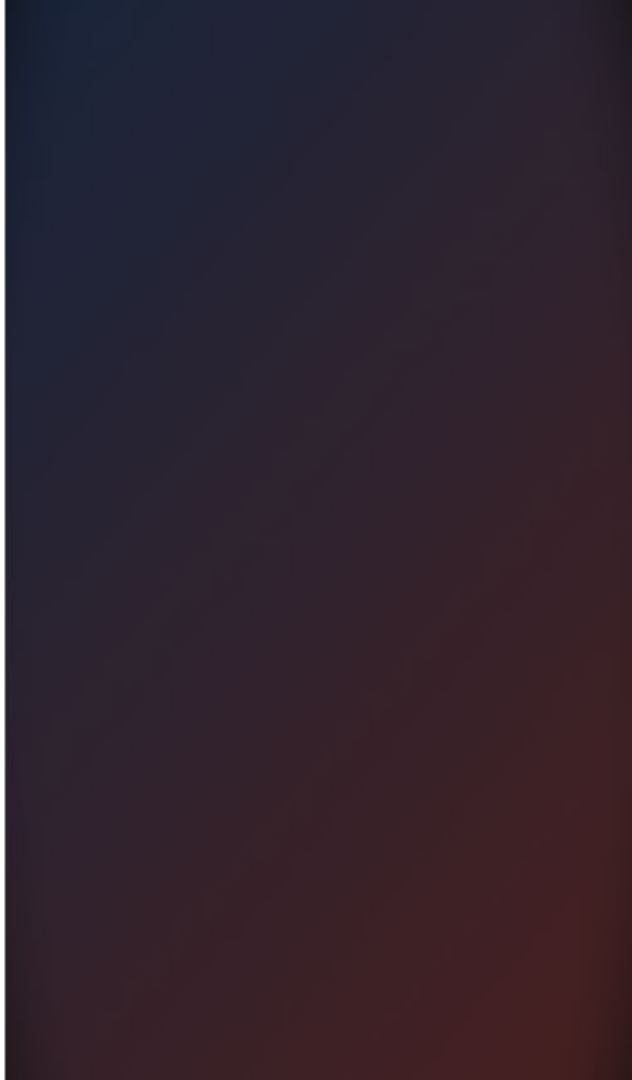
01. Ameelio Introduction

27 million Americans have a family member incarcerated.

They are spending more than **$300 a month** to stay connected with their loved ones.

1 in 3 of them is forced into debt.

Ameelio was founded to solve this problem.



Our Mission

We're on a mission to **fundamentally transform corrections** in the United States, and disrupt the prison telecommunications industry across the country.

We achieve the mission by **empowering the incarcerated individuals** with vital tools to rebuild their lives.

Who we are

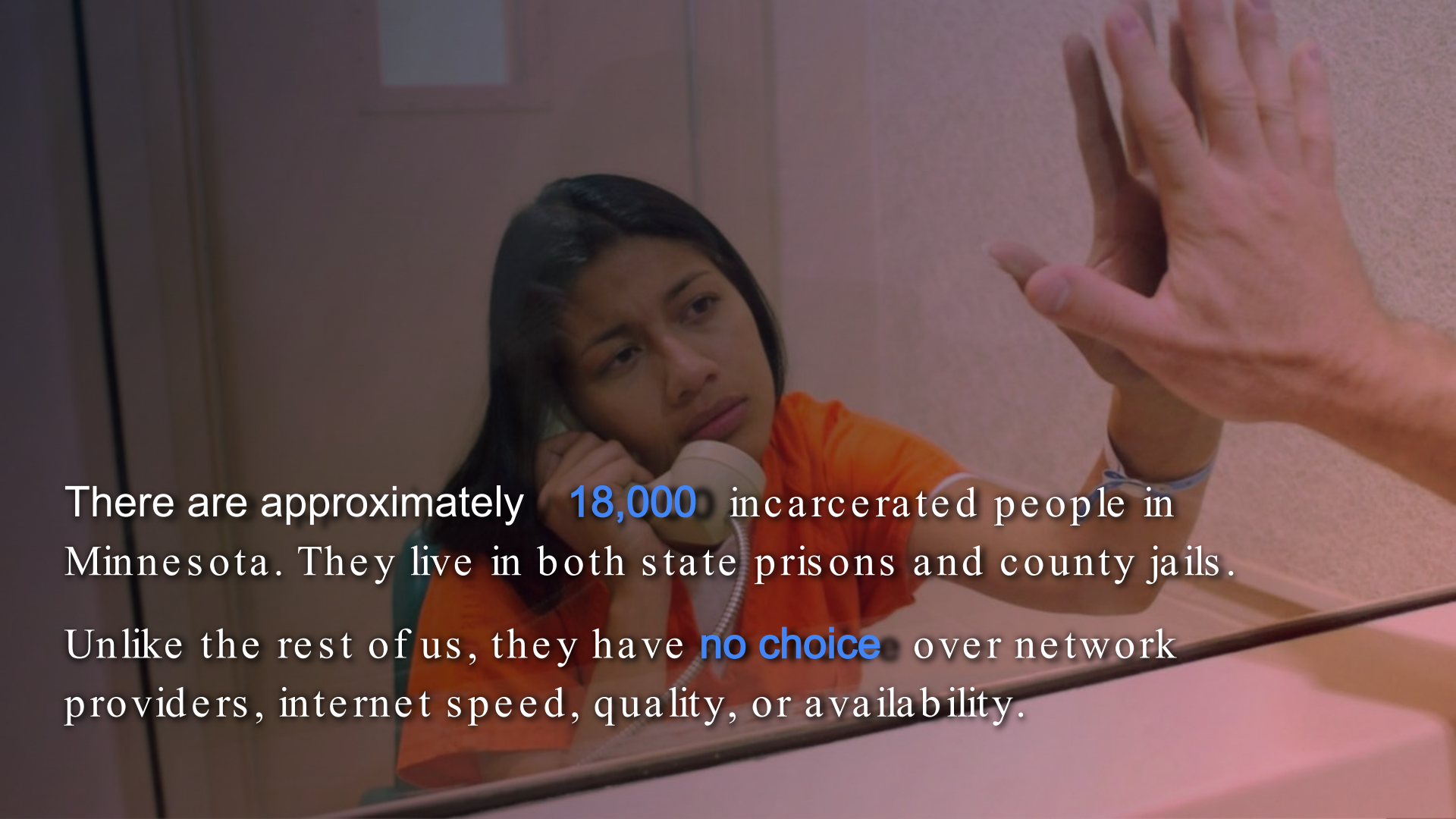
We are the **only nonprofit** provider and the most innovative company in the industry.

We build **communication and education solutions** for incarcerated people and their families and we provide them **for free**.




We are providing solutions in seven states — Iowa, Colorado, Maine, Rhode Island, Mississippi, Indiana, and Illinois. We are also launching a pilot on family and legal communication with San Francisco Sheriff's Office.

02 . How are incarcerated individuals experiencing the digital divide?


There are approximately 18,000 incarcerated people in Minnesota. They live in both state prisons and county jails.
Unlike the rest of us, they have no choice over network providers, internet speed, quality, or availability.

Prisons & Jails

- **Lack of network ownership** stifles competition in software and hardware providers
- **Outdated, insecure network** infrastructure results in low-quality connections.
- Prison networks used as **profit-generating tools** of exploitative providers.

People Behind Bars

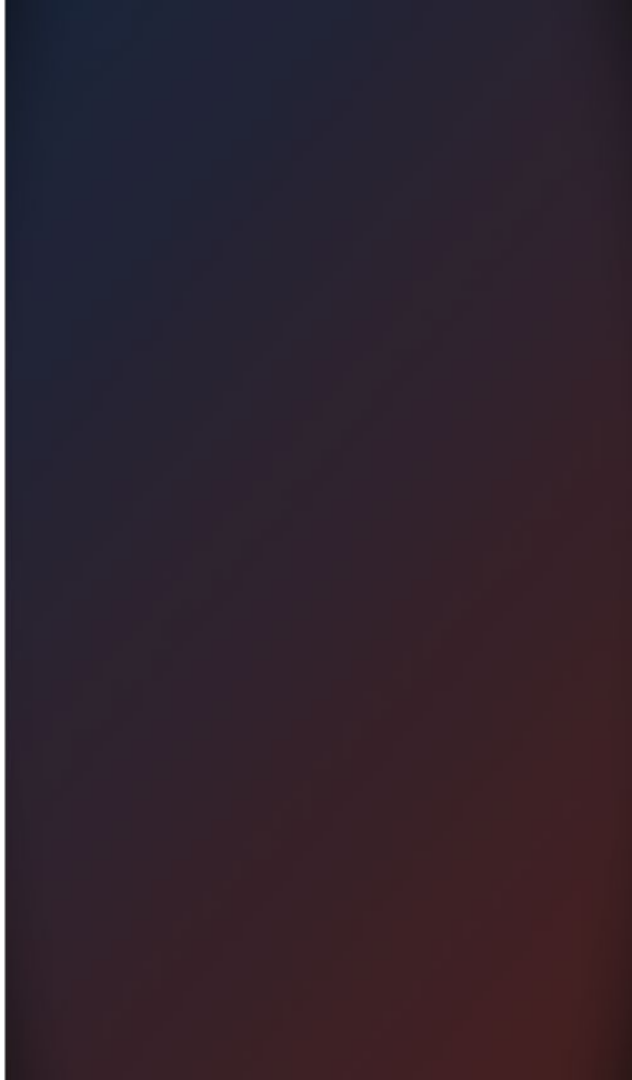
- Having to pay the hidden and **inflated price for internet**.
- **Lack of access to digital tools**, such as video calls, data transfer, music and e-book downloads.
- Connectivity issues **lower call quality** - dropping, breaking up, merging with other calls, etc.
- **Ill-prepared for reentry** due to unfamiliarity with modern technology.

03. Recommendations for MN Office of Broadband Development

Latest draft is a huge step in the right direction

The latest draft of the Minnesota Digital Opportunity Plan includes multiple sections dedicated specifically to discussing incarcerated individuals.

- **Existing initiatives to strengthen digital equity among incarcerated individuals**, including provision of free calls, educational services, and tablets.
- **Recognition of gaps in current digital resources available to incarcerated individuals**, including internet access and digital literacy.
- **Systemic challenges faced by incarcerated individuals**, including poverty and racial discrimination.

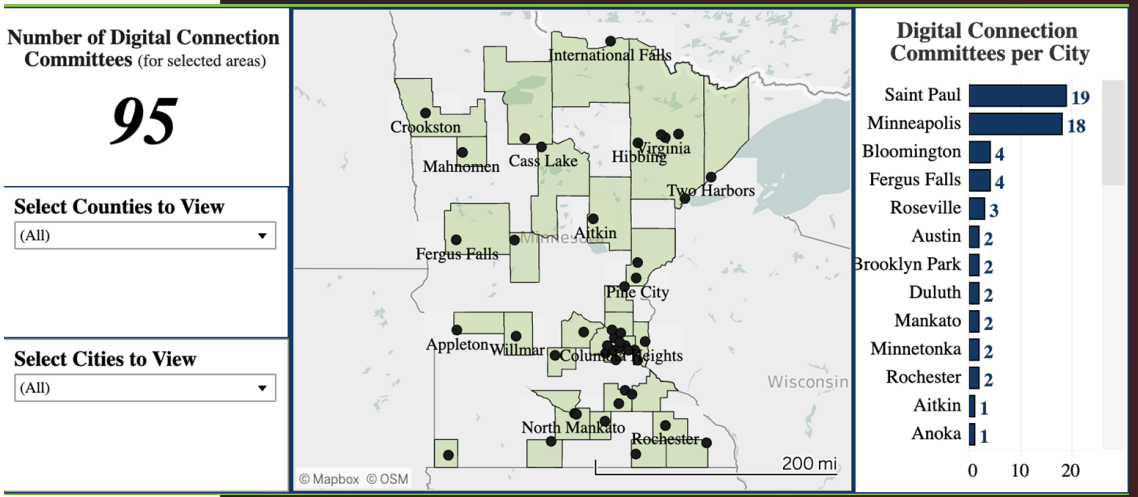


The Digital Equity Act requires a high-level statewide digital inclusion assessment as well as individual assessments of each of the following eight covered populations. These are groups of people who, due to systemic challenges, may face disproportionately low rates of digital inclusion when compared to the overall U.S. population. This list is copied verbatim from the State Digital Equity Planning Grant NOFO:

(1) Individuals who live in covered households;[31]
(2) Aging individuals;[32]
(3) Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;
(4) Veterans;[33]
(5) Individuals with disabilities;[34]
(6) Individuals with a language barrier, including individuals who
    a. Are English learners; and
    b. Have low levels of literacy;
(7) Individuals who are members of a racial or ethnic minority group; and
(8) Individuals who primarily reside in a rural area.[35]

However, even though the incarcerated population is named as one of the **8 covered populations** in the DEA guideline,

It does not appear that any of the 95 DCCs formed in MN represent a correctional facility or related non-profit organization.



Recommendations to improve representation of incarcerated individuals

- **Collect feedback directly from currently incarcerated individuals**, whether through survey or state-led focus groups.
  - In Section 6.1.2 (Inter-Agency Digital Opportunity Workgroup), we strongly encourage that MNDOC be included in any future re-forming of the Workgroup.

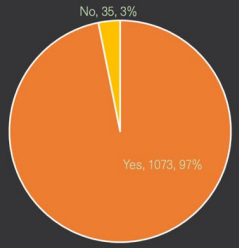
- **Include prisons, jails, resource providers and community groups** for the incarcerated population as stakeholders in the digital equity ecosystem mapping.
  - We encourage OBD to offer assistance to incarcerated individuals who may be interested in forming a DCC.

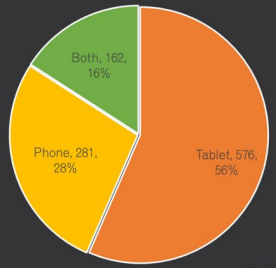
- **Produce a digital equity-focused engagement event** or planning workshop in prisons and jails:

Recommendations to improve **access** to digital services

- Consider correctional facilities as **community anchor institutions** in network planning and rollout.
- **Drive procurement** through the lens of promoting digital equity and encourage new technologies.
  - Ex: PA's RFP favored vendors willing to share their network with others, even those in direct competition
- Contract with an external entity to do a **network assessment** for correctional facilities.
  - Add an additional section on the topic of *Network Infrastructure and Access in Correctional Facilities* to Section 5.7.2

97% of family members have regular connectivity issues





Participant Response:

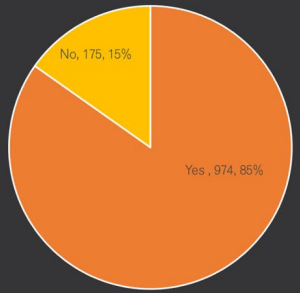
"Tablet: getting dropped, cutting out, going silent, lines being crossed so you'd sudde different person, plus there is a time lag between him and I speaking. I'd say about 70' calls go silent at one point or just hang up.

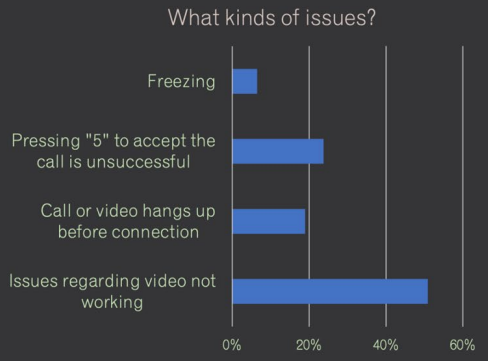
Wall phone: less problematic, sometimes it won't connect but other than that they worl

97% of family members

of incarcerated people in California experience regular connectivity issues.

85% of participants experience issues accepting phone calls and/or video calls





85% of family members

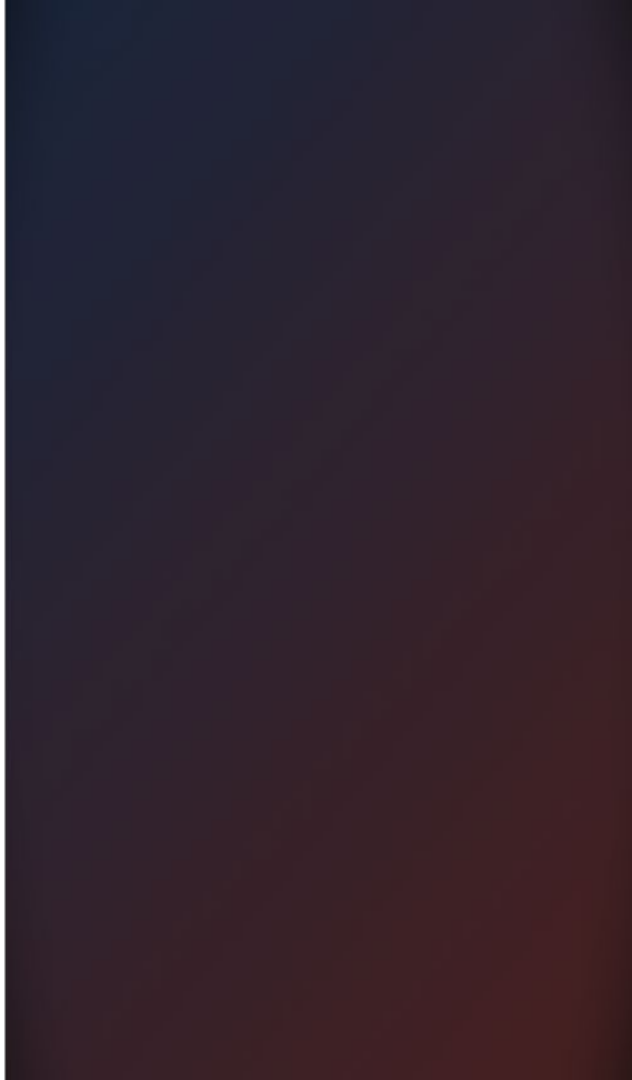
experience issues accepting phone or video calls from incarcerated loved ones

Recommendations to improve affordability of digital services

- **Investigate the hidden costs of digital access and other cost-driving services.**

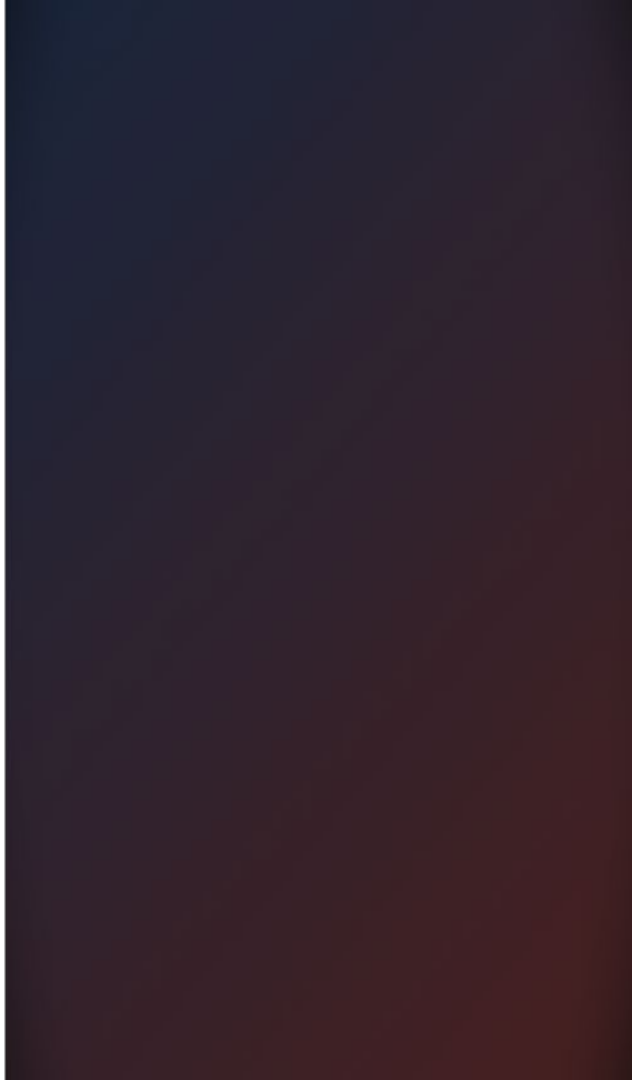
  For example, while recent legislation made calls free for incarcerated individuals, the current provider will likely continue to charge exorbitant fees to the state to maximize its profits.

  They may look to increase profits in other areas as well, for example by increasing the cost of educational programming or other tablet-based services.



Recommendations to improve implementation of new digital services

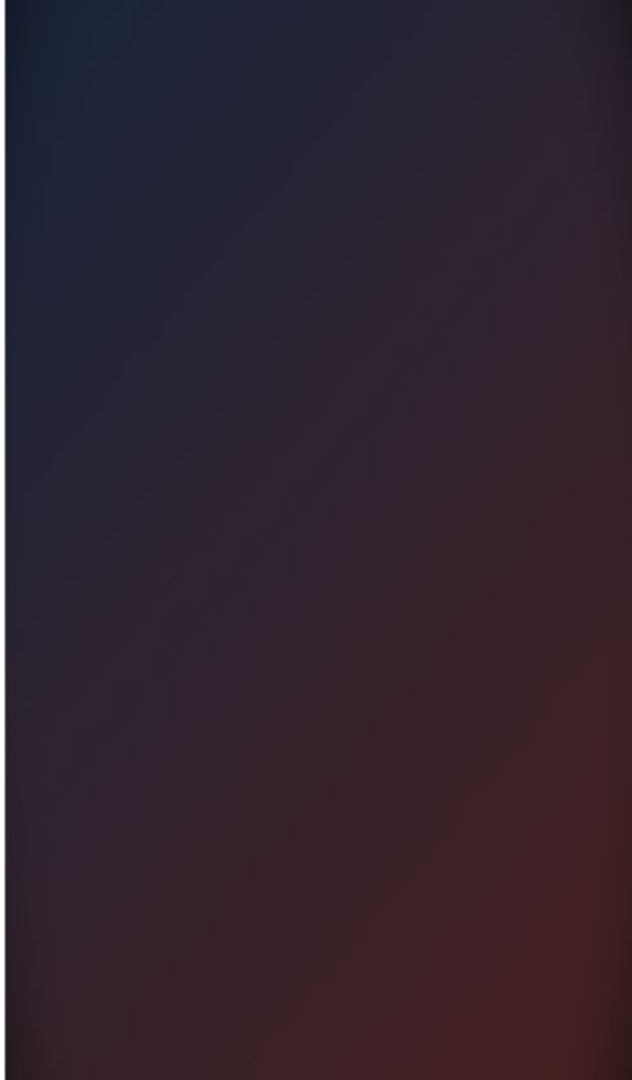
- Add a **digital navigator** in the jails and prisons.
- **Include funding** for critical digital skills training and support, specifically for incarcerated individuals.
- **Incentivize publicly owned network infrastructure and devices**; Ensure that correctional facilities keep up with network quality standards set forth by the state.



Recommendations to ensure *all* incarcerated individuals are included

- Where possible, we recommend modifying language focusing on **formerly incarcerated Minnesotans who are re-entering society** to also include **currently incarcerated Minnesotans.** (Ex: Goal 3.3.1)

- It is already incredibly difficult to attain work for formerly incarcerated individuals. Often, waiting until release to provide these individuals with digital resources may be too late.



04. Why is it important to include incarcerated individuals in Digital Equity Plans?

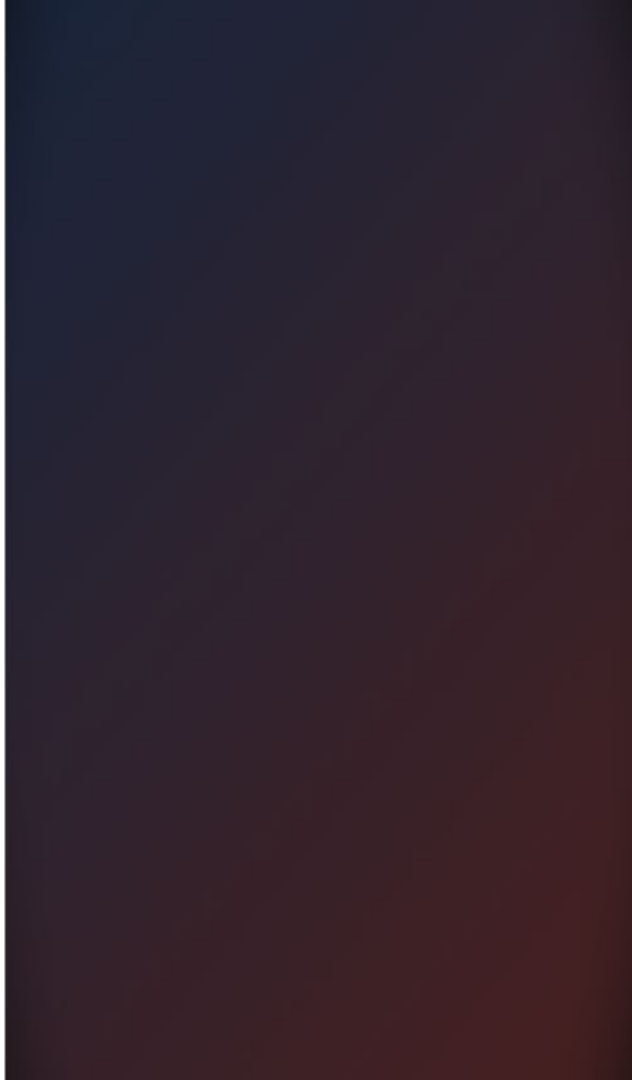
Accessing digital services is not only the moral thing to do, but also has **clear, quantifiable benefits** to incarcerated individuals, their communities and our society as a whole.

Promoting Education and Skill Development

Providing access to digital tools and educational resources can empower incarcerated individuals with valuable skills, improving their chances of successful reintegration into society upon release.

Incarcerated individuals who have access to digital learning opportunities are **30% more likely to enroll in post-secondary education** after release.

Incarcerated individuals who participate in educational programs while in prison are **43% less likely to return to prison upon release.**

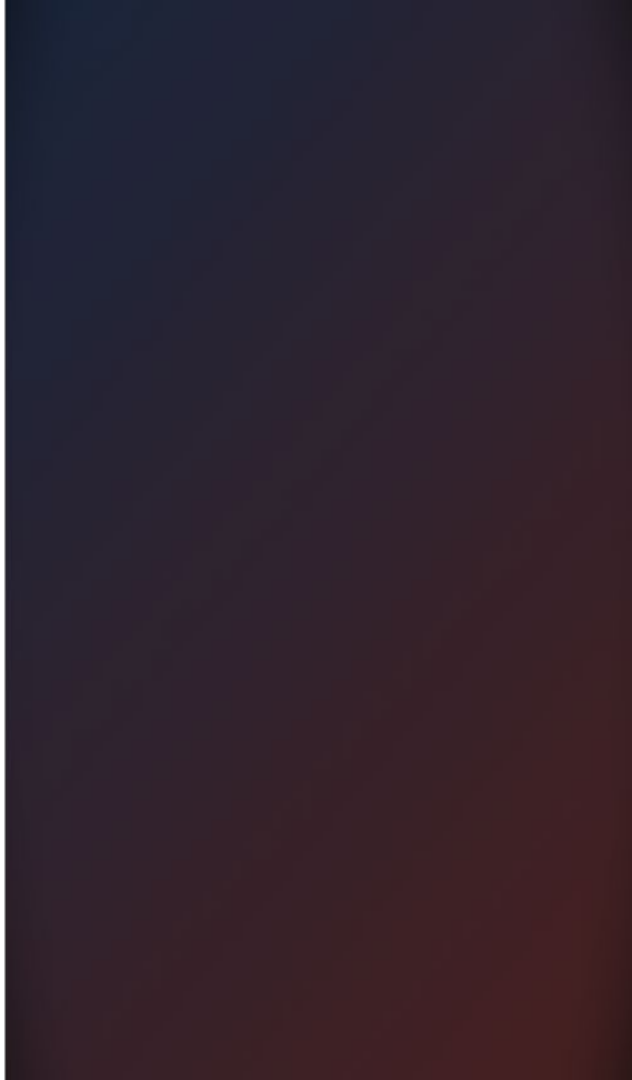


Enhancing Communication and Family Ties

Access to email, video calls, and virtual visitations can foster healthy relationships, support mental well-being, and contribute to smoother reintegration processes post-release.

A research study published in the Journal of Offender Rehabilitation revealed that strong family connections **reduced the likelihood of recidivism by 22%.**

A study by the Minnesota Department of Corrections found that inmates who maintain regular communication with their families are **13% less likely to be involved in disciplinary incidents** within the correctional facility.

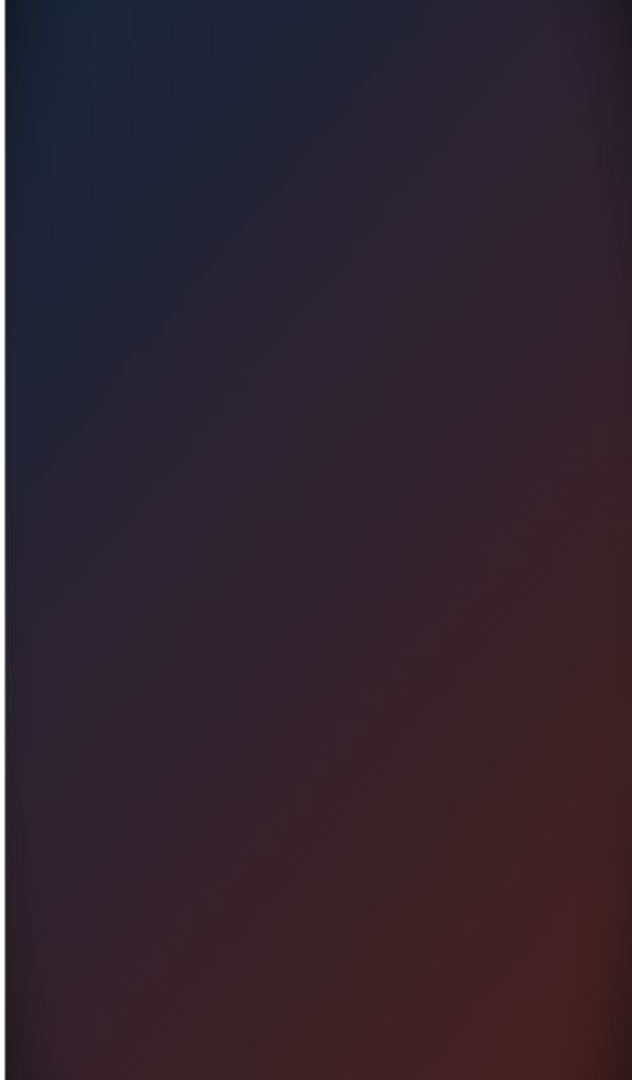


Reducing Isolation and Disparities

Addressing the digital divide within correctional facilities can contribute to reducing disparities and foster a more inclusive society.

According to a survey conducted by the American Civil Liberties Union (ACLU), **67%** of incarcerated individuals reported **feeling more connected to the outside world** after gaining access to digital communication tools.

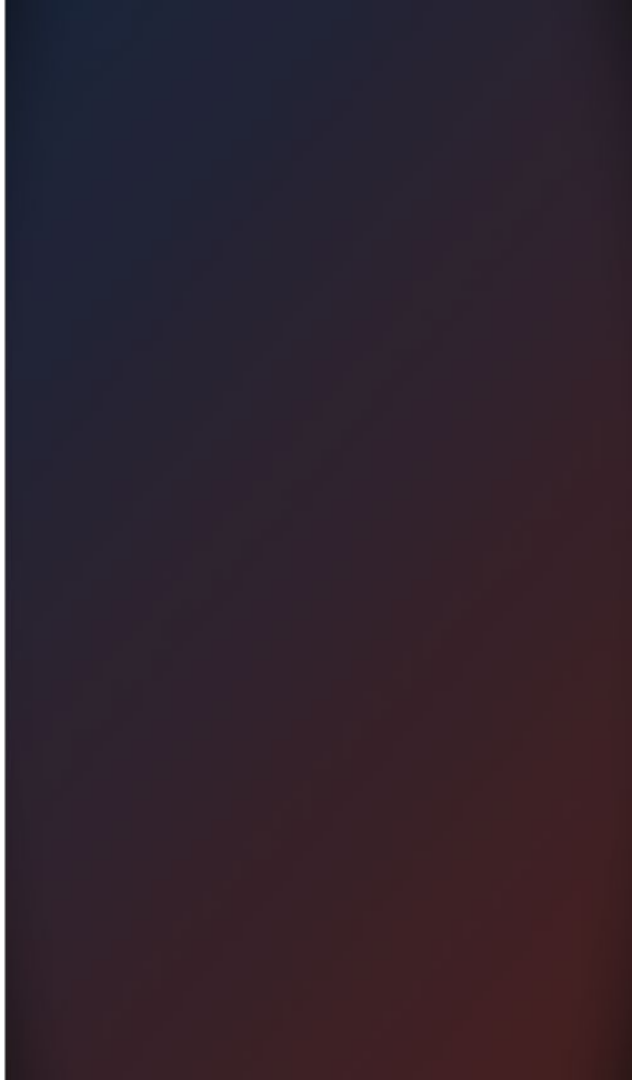
Additionally, correctional facilities with digital equity initiatives experienced a **15% decrease in reported inmate-on-inmate incidents**.



Preparing for Reentry

Online job searches, resume building, and access to online job applications can enhance post-release employment prospects and reduce the likelihood of reoffending.

According to the National Institute of Justice, access to technology and job-related digital skills can **increase post-release employment rates by 28%.**



ameelio

Join us in revolutionizing the corrections system

nick@ameelio.org
april@ameelio.org

MN Digital Opportunity Plan Review

Note: These comments were submitted to the Office of Broadband Development on September 29, 2023. This document has been created to share directly with OBD staff for a meeting with Ameelio's staff on October 3, 2023.

Comments, by section:

Handout: Executive summary

No comment

1: Introduction

We commend Minnesota's Office of Broadband Development (OBD) for opening up this plan with the following quote: "I think everyone should have equal access to internet connectivity. It's an essential part of life in this day and age, and not having internet really inhibits opportunities for people."

As the only non-profit provider of both communication *and* education technology in the correctional industry, we firmly believe that access to technology is fundamental to the successful rehabilitation of incarcerated individuals. To that end, we strongly support the inclusion of incarcerated individuals as a covered population under the Digital Equity Act, as well as OBD's decision to include several specific sections throughout this report dedicated to advancing equity for them.

2: Planning Process: The Minnesota Model

While we understand that both the formal survey period and public comment period has ended, we would recommend that going forward, to the extent possible, OBD consider ways to solicit feedback from both currently incarcerated individuals, and recently released individuals, to inform the planning process for a final draft. This is particularly important, given their status as a covered population under the Digital Equity Act.

One potential option is to facilitate the formation of a Digital Connection Committee (DCC) made up of incarcerated individuals. These individuals would obviously be significantly limited in their ability to meet and document their findings in any sort of consistent manner, but one possibility is for OBD to coordinate with the Minnesota Department of Correction (MNDOC) to support the formation of a limited number of DCCs across the state.

3: Goals

Ameelio commends the inclusion of formerly incarcerated people in Goal 3.3.1, which aims "to ensure formerly incarcerated Minnesotans who are re-entering society receive full reentry support connecting them to digital technologies when legally permissible." However, we believe it is vital that *currently* incarcerated individuals are also included in such a goal, and recommend the goal be amended to include both "formerly and currently incarcerated Minnesotans".

4: Implementation

No comment.

5: The Current State of Digital Opportunity

We wholeheartedly agree with the statement in Section 5.7 that "People who are incarcerated must essentially put their technology skills on hold during their detainment." We believe it is essential for a successful reentry that incarcerated people are allowed access to modern technologies *during* their incarceration, rather than after. This is especially true when it comes to finding gainful employment, given the vital role that technology now plays in not just our day-to-day work lives, but also in the job search and application process.

In Section 5.7.2 (Unsupported Digital Necessities for People Who are Incarcerated or Re-Entering Society), we suggest adding an additional section on the topic of *Network Infrastructure and Access in Correctional Facilities*. Unlike most of us, who have a choice over network providers, internet speed, and security setup, incarcerated individuals are often subject to outdated network infrastructure. Many correctional facilities today still rely on decades-old wiring, with download speeds as low as 10 Mbps. Compare that with the ones in most modern internet plans, which support 1,000 Mbps speed.

Insufficient network speeds can result in low-quality video calling and voice calling solutions, hindering the ability for incarcerated individuals to access digital resources, including video calling, voice calling, and educational programming. This can manifest in dropped calls or slow download speeds of educational videos. In a survey conducted in California, 97 percent of family members who have incarcerated loved ones in state prisons (currently contracts with ViaPath for service) have regular connectivity issues. The issue is particularly impactful for tablet-based communications. Users are reporting that about 70 percent of the calls "go silent at one point or just hang up."[1]

[1] Empowering Women Impacted by Incarceration (EWII), CDCR/ViaPath Communication Challenges survey, 2023

Outdated network infrastructure in correctional facilities further limits the extent to which incarcerated individuals can access and engage with modern digital technologies, including educational resources, the vast majority of which are available exclusively online.[2]

Further complicating the problem of inadequate network infrastructure is the manner in which prisons and jails contract out for their network infrastructure. In many cases, these facilities do not own, but instead lease their network maintenance, equipment and assessment. This is particularly prevalent among county jails, where facilities are often faced with steep budget shortfalls. This lack of ownership results in a lack of competition, control and oversight, placing them in the undesirable position of needing to either procure another vendor to install a new network at the end of the current contract, or continue contracting with the existing vendor. This lack of competition then contributes to the low-quality network services already prevalent in most prisons and jails.

Prisons and jails are further incentivized to adhere to this leasing model thanks to the practice of for-profit companies offering to provide the networks "at no cost" to the agency. Instead, these companies subsidize the cost of providing this network equipment using the revenue generated from the phone calls and video calls made by incarcerated individuals. In doing so, incarcerated individuals are forced to subsidize the very networks that are often leading to inadequate services.

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[2] Moraff, Christopher. (July 9, 2016). *Digitizing the 21st-Century Prison*. Next City.

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6: Areas of Alignment

In Section 6.1.2 (Inter-Agency Digital Opportunity Workgroup), we strongly encourage that MNDOC, as well as organizations providing services for incarcerated individuals on the ground, be included in any future re-forming of the Workgroup. Given the almost complete inability for an incarcerated individual to actively participate in an OBD listening session, or the existence of any DCCs representing incarcerated individuals, the participation of these organizations in the Workgroup will be vital in ensuring that the state's final plan reflects their unique needs and challenges.

7: Conclusion

No comment.

Appendices A B, C

Ameelio would be more than happy to be added to the list of 'Additional Contacts' in Appendix B by meeting with staff from OBD in the next phase of the plan's development. We have worked with staff in multiple states this year to offer our unique perspective as a non-profit provider of correctional technologies in advocating for the inclusion (or increased inclusion) of incarcerated individuals in every state's digital equity plan.

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[3] (2018). *The Importance of Family Support for Incarcerated Individuals: A Comparative Study of Perceived Social Support*. Journal of Offender Rehabilitation.
[4] Wang, Leah. (December 21, 2021). *Research roundup: The positive impacts of family contact for incarcerated people and their families.* Prison Policy Initiative.
[5] (2020) *Reentry Guide: For People Returning to Minnesota Communities from Correctional Facilities*. Minnesota Department of Corrections.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	City of St. Louis Park
Email	jsmith@stlouisparkmn.gov
Zipcode	55416
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	Handout: Executive summary

Comment regarding the Digital Opportunity Plan

This Digital Opportunity Plan is in line with feedback we've heard from St. Louis Park residents through a variety of input opportunities.

According to American Community Survey data, 95.45% of St. Louis Park's 24,135 households had a computer and 92.2% of households had a broadband internet subscription in the years 2017-2021.

However, the gap in both these number decreases in six Census tracts (approximately 10,000 households) with higher proportions of residents who identify as Black, indigenous and people of color; who have immigrated since 2010; who are ages 65 and over; who report speaking English less than "very well;" and median household income of $56,346 - $63,750. In these tracts, households reporting they have no internet subscription dips to as low as 83.6%; while households reporting they have no computer drops to a low of 88.5%.

While the numbers in these six Census tracts may still seem high, the need for increased computer and internet access was highlighted during the pandemic when some senior residents were unable to access online programming at the local senior center; or students were using WiFi hotspots at fast food restaurants to complete assignments; or adults were unable to access online resources. The pandemic accelerated even more the dependence on and need for technology access.

Prior to Comcast franchise renewal in 2021, a consultant conducted a community needs assessment for the City of St. Louis Park. They held three in-person focus group workshops, attended by 54 people representing city staff, elected officials, boards and commissions members, local businesses, nonprofit organizations, public and private schools and residents. An additional online survey garnered 536 responses representing a wide swath of the community.

While many of the questions were focused on Comcast and cable service, questions were asked about interest in city-offered media-related workshops; computer and internet access; and computer and software training. Results included the following for respondents saying "yes" or "maybe" to these options:
• 60.3% - Workshops on different types of media
• 53% - Free access to computers and the internet
• 51.1% - Computer and software training

In promoting the Affordable Connectivity Plan (ACP), city staff discovered that informing people of the plan was only the first step. Many people needed in-person help to navigate the process of applying for the ACP.

For many years, a city staff person ran a Computer Buddies course at the local senior center out of his own interest. That course has ended with the retirement of that employee. We continue to receive calls from seniors looking for help with basic computer needs, and have to refer them to

private services that are not financially accessible to everyone.

US Internet is conducting a three-year expansion in St. Louis Park, with a goal to offer fiber to the premise (FTTP) high-speed internet to all households. The City of St. Louis Park entered into an agreement with US Internet in 2017, allowing US Internet to lease city-owned fiber infrastructure and space to rack equipment in three city buildings.

As part of the agreement and to address equity issues in access to internet service, US Internet first offered service at Meadowbrook Manor (now Edge on Excelsior), then to other multi-unit residential buildings and commercial buildings. In 2019 they began to offer service in the south Sorensen neighborhood, a largely single-family home area. In late 2021, US Internet purchased property in St. Louis Park to build a data center and central office from which to distribute fiber. Their first big year of expansion was in 2022, completing 24 phases of six-block areas. Another 23 phases have conduit complete and are awaiting backbone, splices or fiber. US Internet plans to pass every residential and non-residential property in the city with fiber and its service offering by the end of 2024.

Related to equity in broadband access, the CDC's Social Vulnerability Index shows two census tracts in St. Louis Park ranking in the highest level of need based on income; access to food, transportation and healthcare, and other livability factors. Twenty-five percent of these tracts are in the first portion of US Internet's expansion plan, with the remainder to be included as the project continues.

While this project may bring lower-cost internet options to residents, many residents will still need help with acquiring equipment or with digital education. A recently received $89,000 grant through the Hennepin County Municipal Broadband Expansion Fund is designed to begin to address in 2024. If that effort is successful, sustained funding will be needed to continue and expand offerings. This plan and its associated grant ideas could be big help for that.

This Digital Opportunity Plan is exciting and will be of benefit to all of Minnesota, including those populations in the suburbs who may be overlooked.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	League of MInnesota Cities
Email	khartnett@lmc.org
Zipcode	55103
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity

Comment regarding the Digital Opportunity Plan	he League of Minnesota Cities ("LMC") is a membership association dedicated to promoting excellence in local government. LMC, governed by a Board of Directors consisting of local elected and appointed city officials, serves its more than 800 member cities through advocacy, education and training, policy development, risk management, and other services. In addition to concurring with the comments made by the City of Minneapolis; Northwest Suburbs Cable Communications Commission; North Metro Telecommunications Commission; South Washington County Telecommunications Commission; North Suburban Communications Commission; City of Coon Rapids, Minnesota; and City of Columbia Heights ("Local Governments"), LMC respectfully submits the following comments to the Office of Broadband Development ("OBD") for consideration in implementing the OBD Digital Opportunity Plan. LMC agrees with the Local Governments in recognizing the need for local franchising to ensure broadband opportunities throughout the state. In addition to the comments made by Local Governments, LMC notes that local franchising of broadband services would allow local jurisdictions to ensure buildout of broadband services to underserved areas. Franchising allows local jurisdictions to efficiently determine local needs and ensure that those needs are met by requiring sufficient buildout. In addition, local franchising can be used as an alternative to the State's grant programs to encourage sufficient buildout. Local franchising would be another tool in the toolbox for local jurisdictions to encourage providers to service underserved areas. It is important to note that franchising is more than local jurisdictions simply collecting fees as compensation for private internet providers who use the public's right of way as part of their business. Local franchising for cable services, for example, is a negotiation that not only includes fees but also includes buildout requirements and public services. If used for broadband services, these negotiations could lead to local jurisdictions working with providers to ensure the goals of the OBD Digital Opportunity Plan are met. Broadband franchising would be an invaluable tool allowing local jurisdictions the flexibility to meet the needs of the OBD Digital Opportunity Plan.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	MDE/Pacer DCC
Email	jeff.plaman@state.mn.us
Zipcode	55113
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan	3.1 | Goal 1: Connect People to People 3.1.1 - 2c add schools and service coops to the list of organizations that have access to pilot digital navigator positions SCHOOLS and LIBRARIES are not targeted specifically: 3.1.1 - 2 All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity. Digital Navigation programs coordinated by schools and libraries present a big opportunity which also can connect youth to career pathways. 3.1.1 - 2 All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity. Administer grants designed to support digital navigation services, targeting rural cities, rural counties, and organizations that both represent and serve covered populations. 3.1.1 - 3 All Minnesotans have access to a trusted provider of quality technical support. Develop curriculum and administer grants designed to support high schools, after-school programs, and 2-year public and tribal colleges in hiring and training students to work part-time as paid tech repair technicians. 3.2 | Goal 2: Connect People to Information 3.2.1 - 2, 3 Districts and charter schools are not always plugged into township, city, or county government, they need support to redesign websites, and a push to consider digital opportunity in their planning and creating of resources for students and families. Website redesign - accessibility: schools not mentioned. (3.2.1 - 3) 3.2.1 School districts - develop a Digital Opportunity Plan (add as a grant requirement for local govts?) 3.3 | Goal 3: Connect People to Resources 3.3.1 - How does connecting K-12 students to resources factor into this plan? Particularly at least students in grades 6 and above need access to a large screen device. Not all schools provide this some are still operating in a BYOD situation. Adult centered - BYOD a problem in a lot of schools. Include students in the statement "access to a large screen device." 3.3.1 - 2 - Include STUDENTS in option to afford a large screen device. 3.3.1 - 3 - include Homeless/Highly Mobile, McKinney-Vento Students Students experience homelessness and students in foster care - support for technology/internet resources follow the students around - build off the physical transportation guarantee. (3.3.1 - 3)
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	5: Implementation

Comment regarding the Digital Opportunity Plan

Digital literacy skills and access are increasingly essential to navigate and succeed in Minnesota. The Adult Education (ABE) field is excited to help build digital literacy skills and access across Minnesota. Minnesota Adult Education (ABE) adopted the Northstar Digital Literacy Standards as one of our sets of content standards, acknowledging the importance of integrating digital literacy into the educational and career preparation work we do. In reviewing the plan, the Adult Education team at the Minnesota Department Of Education had some questions and comments:

Adult education (ABE) is providing digital literacy instruction with our services. Yet, we do not see ABE included as a collaborative named partner in this work. For example, ABE is not mentioned in the advocates and educators section page 37-38.

The draft plan notes that "CareerForce as providing in-person and virtual services, including a variety of classes to develop career seekers' digital skills" (p. 38). We would like to note that ABE is working with CareerForce to help provide basic digital skills training. Unfortunately, since CareerForce has shifted their service delivery model to include virtual delivery, this has sometimes created a barrier for some in accessing CareerForce services. That shows the need for digital skills instruction and adult education (ABE) would like to continue to be a part of that work.

Several potential partners are not included in the plan, especially in the education sector.

Community Education is missing as potential advocate to provide services in local communities.

How can community colleges, located in so many communities, support this endeavor? Minnesota's postsecondary institutions should be considered as resources.

The Minnesota Career Education Center (MCEC) provides Adult Basic Education (ABE) services at nine state prison locations. Programs have classroom computers to allow students access to online software programs. Additionally, learners have access to high-quality academic and legal research databases.

The plan notes that the Minnesota Department of Corrections provides tablets for all incarcerated students. In partnership, MCEC ensures effective ABE content is available on these tablets to enhance distance learning and hybrid learning options. Is this accurate with ABE programs and learners at all facilities?

With the focus on "People from Minoritized Racial and Ethnic Groups," it is important to include low literacy and those who do not read or speak English. About half Minnesota Adult Education (ABE) participants are people who are English learners. The vast majority (an estimated 80%) of Minnesota Adult Education (ABE) participants identify as: Black, African, or African American; Hispanic or Latinx; Asian; Native American or American Indian; and/or two or more races or ethnicities (utilizing federal race and ethnicity categories).

To get real input from people who do not speak English information needs to be translated into many languages. Translators hopefully will be

available at focus groups. The $4,000 provided for DCC does not cover this need statewide.

The statewide tech help line that is proposed should be multilingual.

Other states, like Washington, and entities, like World Education, have some strong plans and strategies, too. We encourage Minnesota to consult with other states and review other states' plans so we can focus on increasing both digital access and skills for all Minnesotans.

Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	5: Implementation
Comment regarding the Digital Opportunity Plan	Youth, schools, and libraries can have a greater role in benefiting from and supporting digital inclusion in Minnesota. We recommend that digital literacy education and leadership by the state education agency be clearly articulated in the state's digital opportunity plan. Lack of a statewide educational technology leader position makes coordinating this kind of work difficult. SCHOOLS and LIBRARIES are not targeted specifically: 3.1.1 - 2 All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity. Digital Navigation programs coordinated by schools and libraries present a big opportunity which also can connect youth to career pathways. Students experience homelessness and students in foster care - support for technology/internet resources follow the students around - build off the physical transportation guarantee. (3.3.1 - 3)
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas People from Minoritized Racial/Ethnic Groups People with Disabilities People who are Incarcerated or Re-Entering Society People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Literacy Minnesota
Email	enesheim@literacymn.org
Zipcode	55114
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	The plan is well written and fairly comprehensive but there are a few obvious things that weren't included. There needs to be more specifics and more mention of skills training and support of devices. The plan mentions Northstar Digital literacy assessment briefly but Northstar or an equivalent product should be used across the state for assessment and skills building. DEED helped build Northstar many years ago but very few workforce centers use it. Those that do, use it on their own, not part of the wider system. Workforce systems, library systems and community college systems across the country are using Northstar for assessment and skills building. I'd hate to see Minnesota left behind. Adult Basic Education can be a key partner in this work but is not mentioned in any significant way. Please say more about digital navigation and how community programs can plan a key role in that work.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Matt Rantala
Email	mrantala@co.carver.mn.us
Zipcode	55375
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation
Comment regarding the Digital Opportunity Plan	A couple of the Activities (1.2.b on page 24 and 3.1.a on page 26) seem to be targeted at ISPs receiving grants through OBD. I would suggest attempting to include ISPs that have not received grants. I have heard ISPs talk about having difficulties in getting potential subscribers who would be ACP eligible. While the value of digital navigators are mentioned a few times, I don't see any activities to support the number of navigators. I think an activity to support training students to act as digital navigators (similar to activity 1.3.a on page 24) would be appropriate. Potentially, this could be a collaboration with ISPs who help onboard new customers (also supporting activity 1.2.b) or through high schools/libraries/UM Extension. I also wonder if the Minnesota Department of Health Services could also be a point of contact for informing/helping register people about the ACP program. Local staff working with citizens eligible for certain benefits (SNAP, for example) are likely to be eligible for ACP and may have some of the same documentation requirements. That would seem to be in alignment with HS' goals to make telehealth more accessible. Providing a "consumer reports" type guide to help users decide what devices meet their needs would be valuable for people who have never had digital device. Or providing existing resources to aid.
Is there an additional section you would like to comment on?	Yes

Which section of the plan does your comment address?	3: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	While the Digital Equity Act includes "individuals who primarily reside in a rural area" as a covered population and the rates of technology availability, adoption, and use are clearly lower in Greater Minnesota (pages 36-41), it would be interesting to see the absolute number of individuals in addition to the rates. For example, on page 38, it is noted that 66.8% of Greater Minnesota have a broadband subscription vs 91.5% in the Metro counties do. My ballpark calculations (using a state population of 5.8 million, with 55.1% in the Metro and 44.9% in Greater Minnesota) indicates that there are 271,000 individuals in the Metro area and 864,000 in Greater Minnesota who do not have broadband meaning that about 24% of individuals who lack broadband are in the Metro area. While the need for broadband and related resources are clearly larger in Greater Minnesota, keeping both the rates of need and total need in mind is necessary. The numbers also should be viewed through the perspective that broadband availability is more of a limiting factor in Greater Minnesota. If we had data that showed adoption rates in serviced rural & urban areas, that would be helpful in gauging how much of the equity problem is infrastructure-based vs other limitations.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	3: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	Just a note that on page 41, this sentence, "In 2022, voter turnout among Minnesotans ages 65 and older was 83.8% compared to 56.1% of Minnesotans ages 25-24." likely contains a typo. The age group might be 25-64, not 25-24?

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Literacy Minnesota
Email	swbrandt@literacymn.org
Zipcode	55114
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity

Comment regarding the Digital Opportunity Plan

Digital literacy skills and access are increasingly essential to navigate and succeed in Minnesota. The Adult Education (ABE) field is excited to help build digital literacy skills and access across Minnesota. Minnesota Adult Education (ABE) adopted the Northstar Digital Literacy Standards as one of our system's sets of content standards, acknowledging the importance of integrating digital literacy into the educational and career preparation work we do. In reviewing the plan, the Adult Education team at the Minnesota Department Of Education had some questions and comments. At Literacy Minnesota we work closely with our MDE colleagues and share their concerns.

• Adult education (ABE) is providing digital literacy instruction with our services. Yet, we do not see ABE included as a collaborative named partner in this work. For example, ABE is not mentioned in the advocates and educators section page 37-38. Minnesota has one of the strongest ABE systems in the nation, and we should be leveraging this asset to its fullest capacity.

• The draft plan notes that "CareerForce as providing in-person and virtual services, including a variety of classes to develop career seekers' digital skills" (p. 38). We would like to note that ABE is working with CareerForce to help provide basic digital skills training. Unfortunately, since CareerForce has shifted their service delivery model to include virtual delivery, this has sometimes created a barrier for some in accessing CareerForce services. That shows the need for digital skills instruction and adult education (ABE) would like to continue to be a part of that work.

• Several potential partners are not included in the plan, especially in the education sector.

o Community Education is missing as potential advocate to provide services in local communities.

o How can community colleges, located in so many communities, support this endeavor? Minnesota's postsecondary institutions should be considered as resources.

• The Minnesota Career Education Center (MCEC) provides Adult Basic Education (ABE) services at nine state prison locations. Programs have classroom computers to allow students access to online software programs. Additionally, learners have access to high-quality academic and legal research databases.

o The plan notes that the Minnesota Department of Corrections provides tablets for all incarcerated students. In partnership, MCEC ensures effective ABE content is available on these tablets to enhance distance learning and hybrid learning options. Is this accurate with ABE programs and learners at all facilities?

• With the focus on "People from Minoritized Racial and Ethnic Groups," it is important to include low literacy and those who do not read or speak English. About half Minnesota Adult Education (ABE) participants are people who are English learners. The vast majority (an estimated 80%) of Minnesota Adult Education (ABE) participants identify as: Black, African, or African American; Hispanic or Latinx; Asian; Native American or American Indian; and/or two or more races or ethnicities (utilizing federal race and ethnicity categories).

o To get real input from people who do not speak English information needs to be translated into many languages. Translators hopefully will be available at focus groups. The $4,000 provided for DCC does not cover this need statewide.
o The statewide tech help line that is proposed should be multilingual. Other states, like Washington, and entities, like World Education, have some strong plans and strategies, too. We encourage Minnesota to consult with other states and review other states' plans so we can focus on increasing both digital access and skills for all Minnesotans.

Additional comments:
Regarding a potential statewide device lending program: digital equity leaders nationwide point to device ownership as the goal, not device lending. We would encourage you to consider device ownership when exploring options for this program. Also, our experience working with device distribution is that a significant proportion of devices will need replacement or repair within 12 months of distribution. A plan must be in place for ongoing technical support and navigation to ensure that devices are maintained in working condition for recipients.

We are concerned that unless funds are intentionally designated for digital skills training and digital navigation services, that these activities will be underfunded compared to the need. In any competitive grant opportunity, we encourage OBD to reserve resources specifically for programs providing skills training and ongoing digital navigation.

Digital navigation and skills training will be more effective at reaching target populations if provided by trusted community organizations. While ISPs can be valuable partners in this work, they may not be trusted by historically underserved communities. We encourage OBD to look to community anchor organizations to take the lead in providing these services.

Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People from Minoritized Racial/Ethnic Groups People with Disabilities People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Sarah Swedburg
Email	sarah@kandiyohi.com
Zipcode	56201
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation
Comment regarding the Digital Opportunity Plan	We strongly support non-competitive grant opportunities for organizations in rural communities that have experience in quality broadband development projects for infrastructure and equity implementation.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Michelle Marotzke
Email	michelle.marotzke@mmrdc.org
Zipcode	56201
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	As the Office of Broadband (OBD) team is aware, this work is expansive, complex, and messy. I encourage the creation of non-competitive grant opportunities for organizations in rural communities by using the federal funding that will be coming to the State of Minnesota and through OBD. These grants would provide funding for organizations that work in the broadband and equity space, including infrastructure deployment and projects that advance digital opportunities for all users. These organizations may include community action partnerships, regional development organizations, cooperatives that offer internet service, and other non-profit or not-for-profit organizations. I also suggest a new goal stating that the State of Minnesota will use a variety of digital equity methods in all programs. For example, the Frontline Worker Pay program could only be used by people who had access to internet service and who understood the confusing form and subsequent emails. Through my organization, we assisted several people from three of our counties to create an email, navigate the application (creating, completing and uploading information), and following up with the subsequent email that said they were denied but really meant that they had to upload their identification. Without a telephone number to call, many people who were eligible for this program were unable to access it.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	5: Implementation

Comment regarding the Digital Opportunity Plan	I urge OBD to find ways to hold providers accountable for consumer issues. Too many providers create confusing pricing plans and make signing up for services difficult for people who are not fluent in English (written or oral), people who have disabilities, and people who do not have reliable access to internet service. There are providers who have made the signup process for the Affordable Connectivity Program (ACP) difficult, if not impossible, and some that require a user to sign up for a social media account in order to connect with the provider. The Federal ACP application is also confusing, so providing funding for digital navigators within existing organizations (such as Community Action Partnerships, county Extension offices, etc.) would help internet consumers understand their pricing and receive discounts they are entitled to.
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Anita Hollenhorst, CTC
Email	anita@goctc.com
Zipcode	56455
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan	- 3.1.1 (3a) - the need for a skilled and trained workforce in telecommunications cannot be understated. In order to meet some of the objectives within Goal 3, especially "All Minnnesotans have access to a trusted provider of quality technical support.", CTC recommends that there should be state and federal resources dedicated to workforce development programs and incentives within the telecommunications industry. The FCC's Telecommunications Interagency Working Group submitted recommendations to address these workforce needs to U.S. Congress in early 2023. Their recommendations provide specific and realistic areas to focus on such as recruitment, Registered Apprenticeship programs, Veteran-specific strategies, safety, and wages/benefits. We would recommend that workforce development be emphasized in Minnesota's Digital Opportunity plan. If providers have a trained and skilled workforce then it's only logical for them to assist Minnesotans with things such as cybersecurity, digital skills/literacy, technical support, device adoption and repair, and access to technology. - 3.2.1 (1) - providers should be incentivized to provide digital opportunity resources/partners. If we're providing the infrastructure and services, then it would be logical for providers to be expected to contribute to Minnesota's data and mapping tools. - 3.3.1 - CTC fully supports income-based subsidy programs like ACP. Reliable, future-proofed internet for all means that it HAS to be affordable. Knowing that the future of ACP is uncertain, we recommend exploring potential models for a statewide program. - 3.3.2 (Objective 3) - Providers should be required to have an internal cybersecurity committee that adheres to the National Institute of Standards and Technology's Cybersecurity Framework. Again, it's only logical for providers - who are responsible for the infrastructure and services - to be expected to help people feel comfortable identifying and mitigating cybersecurity issues.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	5: Implementation

Comment regarding the Digital Opportunity Plan	- 5.1.1 (Advocates & Educators) - If providers were required to have a "digital navigator" on staff (maybe with grant support or other financial incentives?) it would be a logical connection to help further this goal. Providers already have the technological expertise and skills to help support people (newly-connected households or New Americans) so it seems logical that they could help people navigate internet access, acquiring devices, and developing digital skills. - 5.2.2 - Fiber-to-the-premise has proven to be a more reliable form of broadband delivery. Fiber technology is a larger up-front investment but constant improvements in fiber optic technology and equipment can improve how much bandwidth is available - without having to deploy new networks. Funding for the construction, network development, and ongoing maintenance of this infrastructure is critical. - 5.4.1 - Partnerships between providers and tribal communities should not be underestimated and could prove to be very advantageous in terms of digital opportunity. CTC has established partnerships with Bois Forte Band of Chippewa and Mille Band of Ojibwe. Not only will these partnerships help the tribes gain sovereignty of their new fiber networks but they would help advance technology availability, adoption, and use within these Native Nations. - 5.4.3 - As a provider we've seen this firsthand. We try to be flexible in terms of how we provide tenants of multi-dwelling units with internet but the fact is that the owners of MDUs play a large role in if, how, or when the tenants receive reliable, affordable, and safe internet options. - 5.8.2 - As a provider we contract with a third-party vendor to provide language translation services. Language barriers can be a significant obstacle and we don't want it to deter someone from receiving our services. - 5.9.3 - As stated in Section 3 - CTC fully supports income-based subsidy programs like ACP. Reliable, future-proofed internet for all means that it HAS to be affordable. Knowing that the future of ACP is uncertain, we recommend exploring potential models for a statewide program.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #32]
Email	[removed]
Zipcode	55407
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	Handout: Executive summary
Comment regarding the Digital Opportunity Plan	Have we considered regulating access to the internet like it's a telecom? USI has been expanding access to its services based on the ability of people to afford the access and not with any equity pieces. Or, what if we bought them out and provided it as a state service, or handed it to municipalities?
Is there an additional section you would like to comment on?	No

AMERICAN PUBLIC MEDIA GROUP

MINNESOTA PUBLIC RADIO | AMERICAN PUBLIC MEDIA | SOUTHERN CALIFORNIA PUBLIC RADIO

PREPARED FOR:	**MN Office of Broadband Development**
PREPARED BY:	**Anissa Rogness, Director of Public Affairs & Government Relations**
	Nick Kereakos, Senior Vice President, Chief Technology Officer
DATE:	**October 3, 2023**
RE:	**Public Comments on MN Draft Digital Opportunity Plan**

Minnesota Public Radio (MPR) began as a single classical music station in 1967 at KSJR in Collegeville and has grown into an acclaimed regional and national provider of news, information, and culture. Today, MPR is one of the nation's premier public radio stations serving nearly all of Minnesota and parts of surrounding states. Its three regional services - MPR News, YourClassical MPR and The Current - reach nearly 1 million listeners each week through programming for radio, digital, and live audiences (Source: Nielsen Audio, PSA and PPM data, P12+, Mon-Sun 6a-12m, Spring 2021). MPR is supported in part by its 123,280 members, one of the largest membership bases in public radio.

MPR operates a 46-station radio network and its three regional services - MPR News, YourClassical MPR and The Current - produce programming for radio, digital and live audiences. MPR uses its network to deliver vital public services throughout the state, including providing and maintaining the technical infrastructure for Minnesota's Emergency Alert System (EAS) and distributing Minnesota's AMBER Alert System to all broadcasters in the state. Our radio broadcast services are shared at no cost to the public through our statewide network of stations reaching 95% of all Minnesotans.

As a statewide convener, MPR reaches audiences who want to be informed, inspired, entertained, and energized. Our programming helps strengthen communities, fosters dialogue, and celebrates the diversity and creativity that makes Minnesota civic-minded and culturally vibrant.

Programs produced by MPR's national programming brand, American Public Media (APM), reach over 17 million listeners via approximately 1,000 public radio stations nationwide each week (Source: Nielsen Audio, Nationwide DMA data, Persons 12+, Spring '21). APM is one of the largest producers and distributors of public radio programming in the world, with a portfolio that includes BBC World Service, Marketplace, and the leading classical music programming in the nation, YourClassical. APM Studios, a division of APM, offers a diverse array of podcasts featuring the best in food, culture, entertainment, business, and journalism.

Our mission is to create the future of public media by amplifying voices to inform, include, and inspire. Through our five-year strategic plan, *Audiences First 2025*, MPR is producing content and experiences that engage diverse audiences to connect people with each other, their communities, and the world.

Nearly all of MPR's produced content is available digitally, and many content offerings are now specifically created for digital audiences, enabling more Minnesotans throughout the state (as well as people around the world) to have access to our programming. The opportunities created through online and digital content have allowed us to serve more people than ever before. MPR's web pages receive an average of 8.4 million monthly pageviews and our online audio and video content is streamed or downloaded more than 9.5 million times each month (Sources: Google Analytics, Triton, Megaphone, YouTube, Facebook, partner sources).

As MPR continues to focus on creating content that can be accessed on multiple platforms, the availability and deployment of broadband and accessibility of internet technology is very important to us. It is here that we align well with the goals of the MN Draft Digital Opportunity Plan to: (1) Connect People to People; (2) Connect People to Information; and (3) Connect People to Resources.

There are a few specific areas on which we would like to provide comments.

Emergency Alert System. As previously mentioned, MPR uses its network to deliver vital public services throughout the state, including maintaining the technical infrastructure for Minnesota's Emergency Alert System (EAS) and distributes Minnesota's AMBER Alert System to all broadcasters in the state. We urge the MN Digital Opportunity Plan to consider the need to provide emergency information to the widest number of people, to the greatest extent possible.

News Distribution. We currently reach 95% of Minnesotans through our network. We believe it's important to have local reporting resources in communities throughout Minnesota, including areas we consider to be "news deserts." Deployment of broadband infrastructure and equipment throughout Minnesota can only aid in providing these critical resources to people in communities across our state.

Digital Literacy and Training. One of the areas included in the MN Draft Digital Opportunity Plan involves technical assistance, digital literacy, and training. Our content is only valuable if Minnesotans have the digital skills to access it. We urge the MN Office of Broadband Deployment to determine the technical assistance and training needed so Minnesotans can fully utilize the resources deployed.

The MN Office of Broadband Deployment values authenticity, cooperation, and partnerships. MPR strives to connect Minnesotans through accessible journalism and authentic conversations. As we strive to provide trusted information and build community connections, we believe opportunities for synergy and cooperation exist. We hope to further develop our relationship and partnership with the State of Minnesota in successful implementation of the MN Digital Opportunity Plan.

September 28, 2023

Department of Employment and Economic Development
Office of Broadband Development
Great Northern Building
180 5th St E.
St. Paul, MN 55101

Dear Director of the Office of Broadband:

Ramsey County appreciated the opportunity to form a Digital Connection Committee as part of the Office of Broadband Development (OBD) Digital Equity Planning process and provide input about the digital needs, barriers, and assets in our jurisdiction. We value OBD as a partner in this work and look forward to working together to accomplish our shared goals.

Ramsey County has been actively engaged in the digital equity issue since it was illuminated at the start of the pandemic. We have learned that digital inclusion is the foundation of an equitable future and an inclusive economy, and that it is about the people and not only the wires. This reality became abundantly clear in 2023, after the COVID-19 pandemic shone an undeniable light on the Saint Paul and Ramsey households that lacked access to fast, reliable internet, the devices, and the digital skills needed to reach online opportunities.

Since the pandemic the county has shown significant leadership. Shortly into the pandemic, we distributed thousands of Techpaks that included hot spots for internet, connections and internet-ready devices to Ramsey County and Saint Paul households struggling to get online in the move to online school, work and more. In addition, we stood up a coordinating effort of digital equity resources for our community through our Ramsey Connected initiative. Most recently, we partnered with the city of Saint Paul on the Connectivity Blueprint, which was led by a group of local leaders who helped to create a shared roadmap of progress on digital inclusion. As a group, we also created a comprehensive report rooted in community perspectives, mapped broadband availability and provided technology expertise and recommendations.

We are encouraged by the collective potential of this plan and see the associated funding as an opportunity to accelerate digital inclusion for our state. However, we have concerns.

As the plan indicates, digital barriers affect people within all of the covered populations. In fact, forty-seven pages of data are devoted to the covered populations mentioned in Appendix C of the plan. Many of these pages cite trends and predications for future numbers in the rural area. We suggest the plan reconsider the focus to include urban populations. It seems an oversight to omit the very significant number of people across the covered populations that reside in urban areas. Ramsey County is the third most diverse county in the state just after Mahnomen and Nobles County. In your report, you discuss the covered population of People from Minoritized Race/Ethnicity—37% of whom live in Ramsey County. In addition, we have significant numbers of other covered populations of

categories including people in low-income households, people experiencing language barriers and people who are incarcerated or re-entering after incarceration.

And while, digital barriers affect all of the covered populations, from conversations with residents, community partners, and front-line county staff, we regularly hear about specific barriers to digital access among people experiencing homelessness, people on probation, and renters (especially in multi-family apartment properties).

We also frequently hear about challenges enrolling in the Affordable Connectivity Program, difficulties repairing or replacing personal devices, and concerns about online safety and privacy. We note that many of these issues are identified in the draft Digital Opportunity Plan and appreciate the state's recognition of these challenges. However, we have questions about the viability of the proposed implementation plan to meet the corresponding 2028 performance measures.

In our work with community-based organizations across the metro, we also observed a need for capacity building to mature and support the digital inclusion ecosystem. The Digital Opportunity Leaders Network is an interesting idea to meet that need and to expand Digital Connection Committee model. Plans for richer baseline data, especially related to cyber security knowledge, publishing information about available digital opportunity resources, and advocating for more accessible online content is appreciated and Ramsey County supports those activities with the assumption that adequate funding is available to scale and sustain direct services.

Detailed Feedback and Questions

1. How does OBD propose to meet device goals?

Ramsey County shares OBD's belief that everyone deserves access to a device that meets their needs. This is described in the draft plan as Goal 3.3.1: "All Minnesota adults have the option to afford a large-screen device or smartphone, whichever most efficiently helps them access the applications they require."[1] We note that other states' Digital Equity Plan drafts include clear strategies for device access that will be implemented during the Digital Equity Act funding period.[2]

The strategies identified to support the goal relate to research to inform future programming, rather than activities to meet this need in the near term:[3]

a. Research models for a statewide program similar to ACP that offers a device discount for low-income Minnesotans.

b. Prepare a report that explores sustainable state-managed system for circulating large-screen devices as long-term loans through collaborating public programs.

These ideas, while worthy of exploration, are not tied to accomplishing this goal or the performance indicator that 95% of Minnesota households with access to a computer by 2028.[4] **The final planned**

[1] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[2] Examples include the draft plans from Utah, Tennessee
[3] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[4] State of Minnesota: Digital Opportunity Plan DRAFT p 21

activity in both instances is "Receive report, publish report" with a goal completion date of 2026,[5] which leaves two years without any activity. If the reports on device lending or a statewide discount program are promising, would OBD support the development of such a model? Would such programming be possible to launch during the timeframe of this plan, or is that entirely out of scope? Is funding for devices implicit as an eligible activity in some of the digital navigation grants associated with Goals 1.2.a, 1.2.c and 3.3.d, presumably aligned with forthcoming Digital Capacity grants? Or does OBD assume that devices made available at a discount by some ACP providers and local refurbishers are adequate to meet the goal of 95% of Minnesota households with access to a computer? Does OBD know if the supply chain for refurbishers is sufficient to meet this need? Research into a state-led device lending program[6] implies that current resources may be inadequate.

Finally, ensuring the availability of assistive and adaptive technology would complement efforts to improve government website accessibility as well as ensure that all Minnesotans, especially the covered population of people with disabilities, have access to a device to meet their needs. Ramsey County has repeatedly heard from clients, community members, and other stakeholders about the financial difficulty to purchase a device or replace a lost, stolen or damaged one. Feedback about the ACP device discount noted the discrepancy between what is considered affordable and to whom. The latest ACS data reflects that an estimated 8,710 households lack any device, with approximately 36,801 households without a laptop or desktop device and 15,598 relying on a smartphone for all computing needs.[7] Additionally, the data gathered for the Connectivity Blueprint, indicates the BIPOC community in Ramsey County is disproportionally affected, with only 49 percent reporting that they had the tech and internet access needed to participate in online life. As these are household estimates, we do not have an accurate count of the number of individuals who lack access to an adequate personal device.

2. Connecting people to digital navigators and resources is critical. Adequate funding is needed.

The draft plan notes the value of digital navigation work and the broader digital opportunity ecosystem in Minnesota.[8] The plan then notes: "**One-on-one technology assistance through community-based organizations is becoming more common, but funding is piecemeal overall.** Non-profit organizations are particularly vulnerable. Grants may be available to pilot a new digital opportunity program or service, but sustaining these services is a persistent puzzle."[9]

We appreciate the desire to support digital inclusion practitioners through capacity building and connections, outlined in Goal 1.[10] However, many organizations -- including ours -- need funding to sustain basic operations or maintain a fledging digital navigation program. As the state correctly notes,

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[5] State of Minnesota: Digital Opportunity Plan DRAFT p 21
[6] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[7] ACS 1-Year Estimates, 2022 accessed at S2801: Types of Computers and ... - Census Bureau Table
[8] State of Minnesota: Digital Opportunity Plan DRAFT p 32
[9] State of Minnesota: Digital Opportunity Plan DRAFT p 34
[10] State of Minnesota: Digital Opportunity Plan DRAFT p 16

sustainable funding is a puzzle. But we urge capacity grant funding for digital navigators as a launching point.

Ramsey County urges OBD to allocate adequate funding to this area that is proportionate to the needs and sufficient to meet the key performance indicators stated in the plan. There are no funding targets associated with supporting digital navigation programs, which the county understands may be premature and could be dictated by a future NOFO from NTIA. Nonetheless, it is our assumption that the eligible activities and entities for Digital Equity Capacity grants are outlined in this draft plan, and so we are alarmed by the lack of specificity here.

We note and appreciate the following changes in the presentation of the plan based on initial feedback:

- 1.2 a and c Pilot and/or expand digital navigator services are eligible purposes for grants[11]
- 3.3d Townships, cities, counties, tribes, and orgs serving covered eligible for competitive grants[12]

We appreciate the clarity that expanding current programs is an eligible purpose, and that local government entities (and organizations serving covered populations) can apply for competitive grants. However, we remain uncertain about how "organizations serving covered populations" will be defined. This is a notable contrast to the specificity used elsewhere to identify eligible entities.

For example, in 1.2c the draft plan recommends to "Provide all CAP agencies, Centers for Independent Living, regional public library systems, veteran homes, and area agencies on aging a non-competitive funding opportunity to pilot digital navigator positions that support clients with digital access and skills needs."[13] Support for these organizations aligns with this goal, which we support with the understanding that funding can pilot or expand programming. Other community anchor institutions, such as health care providers, schools, and community colleges are not listed, and many of those organizations have existing digital navigation and/or training programs. For health care providers the connection to telehealth is a "valuable but underutilized resource"[14] and makes this omission particularly confusing.

We assume that other types of community anchors, as well as community-based organizations, would be eligible for digital navigation funding as "organizations serving covered populations," however we did not find a clear definition of this term. It is described slightly differently in two different sections:

- 1.2a "Administer grants designed to support digital navigation services, targeting rural cities, rural counties, and organizations that both represent and serve covered populations"[15]

[11] Added "and/or expand" to eligible purposes, highlighted in slide 27 from 230914 virtual ppt, contrasted with State of Minnesota: Digital Opportunity Plan DRAFT p 16, 22

[12] Additional named entities outlined in slide 27 from 230914 virtual ppt, contrasted with State of Minnesota: Digital Opportunity Plan DRAFT p 20, 27

[13] State of Minnesota: Digital Opportunity Plan DRAFT p 16

[14] State of Minnesota: Digital Opportunity Plan DRAFT p 34

[15] State of Minnesota: Digital Opportunity Plan DRAFT p 16

- 3.3d "Administer competitive grant funding to organizations serving covered populations that are conducting digital opportunity work."[16]

Ramsey County reiterates the need for adequate resources be allocated to these competitive grant categories to meet the breadth and depth of community needs statewide and realize OBD's stated objective to develop a "holistic, comprehensive, and accessible social infrastructure aimed at *reducing* a person's digital precarity."[17] Absent sufficient funding, current digital opportunity programming may not be viable.

We reiterate our original recommendation that all counties receive block grants proportionate to their covered populations or the number of households experiencing digital barriers based on ACS estimates.

3. Prioritize online safety for all Minnesotans.

Ramsey County shares the state's belief that all residents should have access to trusted providers of digital skills training, including cyber security training, as stated in goal 2, "All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity."[18] However, the strategy to meet this goal is puzzling: "Collaborate with internet service providers who are receiving state and federal infrastructure funds to ensure newly connected households understand the basics of cybersecurity."[19]

Feedback we have received about online safety and cyber security highlight its importance for all residents not just the newly connected, as well as the value of trusted messengers in helping people change behaviors.

Although Ramsey County values what internet service providers can accomplish as partners and broadband providers, they are not always suited to be the primary advocates and educators on online safety, especially for people with limited English proficiency. Residents frequently complain about ISPs' service quality, upselling, and customer service. In addition to what we have heard, the draft plan notes that people of color are more likely to rely on a cellular data plan and experience service interruptions because they were "unable to get the technical support they needed from providers. This is likely due to language barriers, cultural barriers, and racial aggressions."[20]

State and local government, schools, libraries, and community-based organizations are more trusted than internet service providers. We urge the state not to overly rely on internet service providers to ensure all residents understand how to keep themselves and their data protected. At the very least,

[16] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[17] State of Minnesota: Digital Opportunity Plan DRAFT p 19
[18] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[19] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[20] State of Minnesota: Digital Opportunity Plan DRAFT p 49

the goal of keeping Minnesotans safe online should be carried out by more than one group of stakeholders.

The plan may assume that the entities receiving grant funding for digital navigation will provide this training as well and outline those expectations in a forthcoming RFP or technical assistance plan. We have noted gaps in available digital skill and safe online practice training materials for English language learners. That could be an area for statewide collaboration and information sharing.

Finally, the proposed goal for 95% of people from covered populations comfortable identifying and mitigating cybersecurity issues[21] seems unrealistic without any identified baseline metrics. It may be intended to be a 95% increase in covered populations who feel proficient.

4. All Minnesotans should have access to a trusted provider of quality technical support.

Ramsey County supports OBD's goal 1.3 that "All Minnesotans have access to a trusted provider of quality technical support."[22] For residents seeking support or repair for their home internet connection, personal device, or other technical issue there are limited options.
The underlying strategies, however, may not address the needs of most residents in the near term:

a. Develop curriculum and administer grants designed to support high schools, after-school programs, and 2-year public and tribal colleges in hiring and training students to work part-time as paid tech repair technicians.
b. Administer grants to small businesses to assess their technology needs and improve their technology access. [23]

The proposal to explore a statewide help line, outlined in strategy 1.2d, better aligns here and could be a plausible strategy to meet this need. [24] However, the final outcome is to a receive a report.[25] We would support working to implement this idea if feasible, especially if interpretation could be provided for residents who are not proficient in English.

Proposal 1.3b: *Administer grants to small businesses to assess their technology needs and improve their technology access*[26], is interesting and Ramsey County is aware of the technology challenges facing small businesses. We note that this idea would not make technical support available to all residents and may exclude the nonprofits and religious organizations that are often in need of technology assistance. According to the Minnesota Council of Nonprofits, in 2021 nonprofit organizations employed 14% of the state's workforce.[27]

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[21] State of Minnesota: Digital Opportunity Plan DRAFT p 21
[22] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[23] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[24] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[25] State of Minnesota: Digital Opportunity Plan DRAFT p 24
[26] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[27] 2020 - 2021 MINNESOTA NONPROFIT ECONOMY REPORT p 4 accessed at 2020-21-minnesota-nonprofit-economy-report.pdf (minnesotanonprofits.org)

Plans to develop and implement technical training programs in high schools are a starting point and an exciting idea but offer no immediate support to Minnesotans lacking technical support.

5. Recognize the digital divide impacting apartment and other multi-dwelling units with action.

Ramsey County appreciates the acknowledgement of a unique digital divide impacting residents of apartments and mobile home parks.[28] The proposed partnership with Education SuperHighway and local housing partners is a promising start and we support this collaboration.[29]

However, there is no work identified other than convening a working group to meet quarterly[30] and there are no associated key performance indicators to measure progress. Is OBD's assumption that projects related to internet access for this housing stock can be funded through another source? We urge OBD to underwrite this goal by making its BEAD funding available for this crucial program.

It is unclear whether the digital opportunity goals for broadband adoption and access set forth in this plan can be accomplished without addressing the connectivity gaps that persist in multi-family housing. OBD notes that people of color are far more likely to be impacted by these issues than white Minnesotans:

> People from minoritized racial and ethnic groups are more likely to be renters than White people. In Minnesota, 19.5% of White Minnesotans are renters. This rate increases to 69.5% for Black Minnesotans, 50.9% of Indigenous Minnesotans, 34.6% of Asian Minnesotans, 62.4% of Minnesotans of an unspecified minoritized race, 41.8% of multi-racial and multi-ethnic Minnesotans, and 50.8% of Hispanic or Latino Minnesotans. [31]

If digital opportunity cannot be extended to residents of multifamily apartments, and those same people are more likely to belong minoritized racial and ethnic groups, can we achieve digital equity absent meaningful solutions to this problem?

There are policy changes that could be recommended to accomplish the goal of interest for all. We recognize that OBD believes policy changes are outside of their bailiwick[32] and thus are not detailing recommendations here. However, **digital opportunity exists within the context of deliberate, historical under-investment in communities of color. We urge OBD to recognize that current policies may reinforce rather than dismantle this digital divide.**

6. Balance research and planning with implementation.

Ramsey County appreciates the desire to meaningfully plan and capture data to inform future decisions. However, the draft plan is very heavy on research, reports, establishing workgroups, and creating local plans. All of these are valuable efforts; however, they appear to have a disproportionate

[28] State of Minnesota: Digital Opportunity Plan DRAFT p 74
[29] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[30] State of Minnesota: Digital Opportunity Plan DRAFT p 26
[31] State of Minnesota: Digital Opportunity Plan DRAFT p 52-53, 74-75
[32] State of Minnesota: Digital Opportunity Plan DRAFT p 8

focus at the expense of implementing current or future plans, or outcomes that may be driven by proposed working groups.

To the extent that the draft Plan is a guide to future funding provided to OBD via NTIA's capacity grant program, we are concerned about a lack of clear recommendations for the specific, proven activities noted above. If, for example, we share a belief that digital navigation, device provision and online-safety training make demonstrable improvements in our community's digital ecosystem, then we hope that they would be funded via capacity grants, and specifically noted in the Plan.
OBD will commission four studies, in addition to expanding the available digital opportunity data:

- **Prepare a report** that explores models for a statewide technology assistance helpline.[33]
- **Prepare a report** that explores potential models for a statewide program similar to ACP and Lifeline to reduce internet costs for low-income Minnesota households.[34]
- **Research models** for a statewide program similar to ACP that offers a device discount for low-income Minnesotans.[35]
- **Prepare a report** that explores sustainable state-managed system for circulating large-screen devices as long-term loans through collaborating public programs.[36]

OBD proposes four new working groups, in addition to the Digital Opportunity Leaders Network and Digital Connection Committee structure, with quarterly meetings as the only proposed output:

- Convene an inter-agency digital opportunity workgroup with appointed membership from state agencies representing key partners and covered populations[37]
- Collaborate with MN Housing, Education Superhighway, North Country Service Cooperative, and other housing partners[38]
- Collaborate with MN Department of Corrections and the MN Career Education Center[39]
- Collaborate with DEED's Office of New Americans[40]

The outcome in each of these instances is the creation of a report or a final meeting. Many of these proposed collaborations, research efforts, and partnerships appear relevant. However, the lack of meaningful goals or objectives is worrisome.

There is a risk that all these outcomes are met without meaningful improvement in the stated digital opportunity key performance indicators that relate to residents' access to devices, high speed home internet, and digital literacy and skills. Instead of reports, we encourage the state to focus on funding implementation and the creation of measurable corresponding actions.

[33] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[34] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[35] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[36] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[37] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[38] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[39] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[40] State of Minnesota: Digital Opportunity Plan DRAFT p 20

We ask for creative thinking beyond the identified highlighted strategies for grant distribution, that focuses greatly on noncompetitive, formula funded models. Rather we would encourage competitive models that allow local areas to achieve state designated goals and outcomes with local opportunities administered by counties and other locally driven entities such as Workforce Development Boards, etc. In addition, it is important to recognize the balance between rural and urban needs. Other DEED workforce funding models have leveraged 60/40% splits to ensure funding flows both to greater Minnesota while recognizing the unique needs of Twin Cities metro area (though urban needs around digital equity are not only prevalent in the Twin Cities metro).

In closing, while digital equity refers to the current state of unequal resource distribution, digital inclusion is the end goal. We would like to see a state in which everyone has the necessary technology to fully participate in all parts of our society. It's the foundation of a fair future and an inclusive economy both in the rural areas of Minnesota but also in urban communities. Ensuring digital inclusion with these one-time capacity building resources can assure that everyone has equal access to jobs, learning opportunities, essential services and vital communication that bonds communities. We have learned throughout the past few years that digital skills, affordability and access to technology are critical to achieving digital inclusion.

Thank you for your work to propel Minnesota to a be a state where all residents have an opportunity to thrive.

Ramsey County Board of Commissioners

Trista Martinson, Board Chair, District 3

Nicole Frethem, Commissioner, District 1

Mary Jo McGuire, Commissioner, District 2

Rena Moran, Commissioner, District 4

Rafael Ortega, Commissioner, District 5

Mai Chong Xiong, Commissioner, District 6

Victoria Reinhardt, Commissioner, District 7

Ryan T. O'Connor, County Manager

HENNEPIN COUNTY
MINNESOTA

Memo

To: Hannah Buckland, Digital Equity Program Lead, Minnesota Office of Broadband Development

Bree Maki, Executive Director, Minnesota Office of Broadband Development

From: Philip Essington, Director of Broadband and Digital Inclusion, Hennepin County

Ryan Jelinek, Medical Director of Telemedicine and Access; Hospitalist - Dept. of Medicine, Hennepin Healthcare

Date: September 28, 2023

Re: Digital Opportunity in Hennepin County and the Twin Cities Metro Area:

Written feedback to the Draft Minnesota Digital Opportunity Plan

Hennepin County, and our fellow co-signers, appreciate the opportunity to form Digital Connection Committees as part of the Office of Broadband Development (OBD) Digital Equity Planning process and provide input about the digital needs, barriers, and assets in our jurisdiction. We value OBD as a partner in this work and look forward to working together to accomplish our shared goals.

As our residents include urban, suburban, and rural communities, we are familiar with the nuances of broadband adoption and digital inclusion work in all three domains.

We appreciate state's vision for the future where "**digital equity connects all Minnesota residents to opportunities, options, and each other"** as well as the three overarching goals[1] and many of the proposed key performance indicators. It demonstrates an understanding of the available data, tools, and metrics. As a data-informed organizations, we welcome specific targets in this field and believe they are ambitious but achievable.

We also note the change in language from a Digital Equity to Digital Opportunity, based on feedback that the term "digital equity" did not resonate with community. That modification aligns with the

[1] State of Minnesota: Digital Opportunity Plan DRAFT p 6

Hennepin County Office of Broadband and Digital Inclusion
300 South Sixth Street, Minneapolis, MN 55487
612-348-3000 | hennepin.us/tech

county's value to prioritize our residents and use plain language. However, we urge the state to not lose sight of the word equity and the structural inequalities that led to the digital divide. In a state like Minnesota with significant racial disparities that are interrelated, we encourage OBD to remain committed to the goal of digital equity for all. All of Minnesota is ***"thousands of places and millions of people each of whom deserve the option to bring technology into their daily lives"***[2] and dominant narratives about rural, suburban, and urban communities can obscure more nuanced realities about the digital divide that deserve attention.

We appreciate that OBD has been directed by the federal government to target its programs toward "covered populations," people who, due to systemic challenges, may face disproportionately low rates of digital inclusion. We are working to correct those systemic challenges as well, especially in light of the scale of this population: In Hennepin County, based on the best available data, the Census estimates that 780,000 residents (61.6%) are defined as a covered population for the Digital Equity Act.[3] There are 131,879 households below the federal poverty level[4] and 193,480 households below 150% of the federal poverty guidelines.[5] More than one third of our residents, or approximately 416,000 people, self-identity as members of members of a minoritized racial or ethnic group.[6] We also note that approximately 18% or an estimated 97,000 households lack a wired broadband subscription,[7] many more households struggle with home internet costs and could be termed "subscription vulnerable"[8] and 63,366 households are estimated to lack access to laptop or desktop.[9]

Digital barriers affect all the covered populations; however, people with lower incomes, people of color, people with limited English proficiency or low literacy skills, and seniors are all less likely to have a broadband subscription or a computer. From conversations with residents, community partners, and front-line county staff, we regularly hear about specific barriers to digital access among people experiencing homelessness, people on probation, and renters (especially in multi-family apartment properties).

We also frequently hear about challenges enrolling in the Affordable Connectivity Program especially for immigrants and refugees, difficulties repairing or replacing personal devices, and concerns about online safety and privacy. We note that many of these issues are identified in the draft Digital Opportunity Plan and appreciate the state's recognition of these challenges. However, we have questions about the viability of the proposed implementation plan to meet the corresponding 2028 performance measures.

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[2] State of Minnesota: Digital Opportunity Plan DRAFT p 41

[3] Digital Equity Act Population Viewer (census.gov)

[4] ACS 1-Year Estimates, 2022 accessed at S1701: Poverty Status in the Past ... - Census Bureau Table

[5] ACS 1-Year Estimates, 2022 accessed at C17002: Ratio of Income to Poverty ... - Census Bureau Table

[6] ACS 1-Year Estimates, 2022 accessed at https://data.census.gov/table?q=B02001&g=050XX00US27053&y=2022&tid=ACSDT1Y2022.B02001

[7] ACS 1-Year Estimates, 2022 accessed at S2801: Types of Computers and ... - Census Bureau Table defined as "Broadband such as cable, fiber optic or DSL" and most closely aligns with the state broadband definition.

[8] People who "find the internet very difficult to fit their monthly service fee into their budgets and live at or near the poverty line." Term introduced by John Horrigan in the Affordability and the Digital Divide report available at 2022 National Research — EveryoneOn.

[9] ACS 1-Year Estimates, 2022 accessed at S2801: Types of Computers and ... - Census Bureau Table

In our work with community-based organizations across the metro, we also observed a need for capacity building to mature and support the digital inclusion ecosystem. The Digital Opportunity Leaders Network is an interesting idea to meet that need and to expand the Digital Connection Committee model. Plans for richer baseline data, especially related to cyber security knowledge, publishing information about available digital opportunity resources, and advocating for more accessible online content is appreciated and we support those activities with the assumption that adequate funding is available to scale and sustain direct services.

Finally, we all reiterate our concerns about digital equity issues that can only be addressed through policy changes. We appreciate an acknowledgement about systematic policy issues[10] that may be outside the scope of this plan. Nonetheless, we believe, and think there is agreement, that without policy changes, the ultimate goal of shared digital opportunity will remain out of reach.

> "This plan exists in the middle of a particular kind of tension between what is permissible and what is needed. The gaps in digital opportunity that many individuals confront daily are often a consequence of long-term gaps in federal, state, and local policy that have allowed people to be left behind. **For gaps to be closed in the long-term, new federal, state, and local policies need to be in place. Without addressing the inequities built into this system, the same gaps will remerge and persist.** It is, however, outside of the purview of OBD to independently recommend policy changes, serve as a regulatory body, or propose regulatory reform."[11]

Our organizations have some specific comments about the draft plan, and they are outlined below.

Detailed Feedback and Questions

1. How does OBD propose to meet device goals?

Hennepin County and our partners share OBD's belief that everyone deserves access to a device that meets their needs. This is described in the draft plan as Goal 3.2: "All Minnesota adults have the option to have afford a large-screen device or smartphone, whichever most efficiently helps them access the applications they require."[12] We note that other states' draft Digital Equity Plans include clear strategies and for device access that will be implemented during the Digital Equity Act funding period.[13]

The strategies identified to support the goal relate to research to inform future programming, rather than activities to meet this need in the near term:[14]

> a. Research models for a statewide program similar to ACP that offers a device discount for low-income Minnesotans.
> b. Prepare a report that explores sustainable state-managed system for circulating large-screen devices as long-term loans through collaborating public programs.

[10] State of Minnesota: Digital Opportunity Plan DRAFT p 76
[11] State of Minnesota: Digital Opportunity Plan DRAFT p 8
[12] State of Minnesota: Digital Opportunity Plan DRAFT p 20
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These ideas, while worthy of exploration, are not tied to accomplishing this goal or the performance indicator that 95% of Minnesota households with access to a computer by 2028.[15] **The final planned activity in both instances is "Receive report, publish report" with a goal completion date of 2026,[16] which leaves two years without any activity.** If the reports on device lending or a statewide discount program are promising, would OBD support the development of such a model? Would such programming be possible to launch during the timeframe of this plan, or is that entirely out of scope?

Is funding for devices implicit as an eligible activity in some of the digital navigation grants associated with Goals 1.2.a, 1.2.c and 3.3.d, presumably aligned with forthcoming Digital Capacity grants? Or does OBD assume that devices made available at a discount by some ACP providers and local refurbishers are adequate to meet the goal of 95% of Minnesota households with access to a computer? Does OBD know if the supply chain for refurbishers is sufficient to meet this need? Research into a state-led device lending program[17] implies that current resources may be inadequate.

Finally, ensuring the availability of assistive and adaptive technology would complement efforts to improve government website accessibility as well as ensure that all Minnesotans, especially the covered population of people with disabilities, have access to a device to meet their needs. We note the existence of current programs to provide or lend assistive technology,[18] but are unsure whether those services are sufficient.

Hennepin County has repeatedly heard from clients, community members, and other stakeholders about the financial difficulty to purchase a device or replace a lost, stolen or damaged one. Feedback about the ACP device discount noted the discrepancy between what is considered affordable and to whom. For these reasons, both organizations have invested significant CARES and ARPA dollars into devices for residents as well as to supplement what is available through the schools for students.

Although Hennepin has distributed nearly 11,000 devices since 2020, we continue to see a growth in referrals for our services and an ongoing need for computers. The latest ACS data reflects that an estimated 17,000 households lack any device, with approximately 63,366 households without a laptop or desktop device and 28,000 relying on a smartphone for all computing needs.[19] As these are household estimates, we do not have an accurate count of the number of individuals who lack access to an adequate personal device.

Recommendations:

- We urge OBD to implement a model for funding device distribution.
- We encourage OBD to clarify whether entities receiving capacity grant funding are encouraged to provide devices as part of the digital navigation service.

2. Connecting people to digital navigators and resources is critical. Adequate funding is needed.

[15] State of Minnesota: Digital Opportunity Plan DRAFT p 21
[16] State of Minnesota: Digital Opportunity Plan DRAFT p 21
[17] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[18] State of Minnesota: Digital Opportunity Plan DRAFT p 43, 55, 58
[19] ACS 1-Year Estimates, 2022 accessed at S2801: Types of Computers and ... - Census Bureau Table

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We appreciate the desire to support digital inclusion practitioners through capacity building and connections, outlined in Goal 1.[22] However, many organizations – including ours – need funding to sustain basic operations or maintain a fledging digital navigation program. As the state correctly notes, sustainable funding is a puzzle. We urge capacity grant funding for digital navigators as a launching point.

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This is a notable contrast to the specificity used elsewhere to identify eligible entities. For example, in 1.2c the draft plan recommends to "Provide all CAP agencies, Centers for Independent Living, regional public library systems, veteran homes, and area agencies on aging a non-competitive funding opportunity to pilot digital navigator positions that support clients with digital access and skills needs."[25] Support for these organizations aligns with this goal, which we support with the understanding that funding can pilot or expand programming.

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[20] State of Minnesota: Digital Opportunity Plan DRAFT p 32
[21] State of Minnesota: Digital Opportunity Plan DRAFT p 34
[22] State of Minnesota: Digital Opportunity Plan DRAFT p 16
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[25] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[26] State of Minnesota: Digital Opportunity Plan DRAFT p 34

proposed as a social determinant of health,[27] potentially even a "superdeterminant" of health, with multiple studies "showing a significant correlation between increasing broadband access and improved health outcomes."[28] We also note the important role that health care providers, including Federally Qualified Health Centers,[29] and safety net hospitals play in serving covered populations.

We assume that other types of community anchors, as well as community-based organizations, would be eligible for digital navigation funding as "organizations serving covered populations," however we did not find a clear definition of this term. Is described slightly different in two different sections:

- 1.2a "Administer grants designed to support digital navigation services, targeting rural cities, rural counties, and organizations that both represent and serve covered populations"[30]
- 3.3d "Administer competitive grant funding to organizations serving covered populations that are conducting digital opportunity work."[31]

We reiterate the need for adequate resources be allocated to these competitive grant categories to meet the breadth and depth of community needs statewide and realize OBD's stated objective to develop a "holistic, comprehensive, and accessible social infrastructure aimed at *reducing* a person's digital precarity."[32] Absent sufficient funding, current digital opportunity programming may not be viable.

Recommendations:

- We reiterate our original recommendation that all counties receive block grants proportionate to their covered populations or the number of households experiencing digital barriers based on ACS estimates.
- We urge OBD to allocate funding for digital navigation services proportionate to the need and sufficient to meet the key performance indicators stated in the plan.
- We encourage OBD to clarify the definition for "organizations serving covered populations" and explicitly scope in community anchor instructions.
- We urge OBD to include components of a future capacity grant NOFO that align with work that we have piloted at Hennepin County and Hennepin Healthcare and in similar programs operated in the state.

[27] Benda, Natalie C et al. "Broadband Internet Access Is a Social Determinant of Health!." American journal of public health vol. 110,8 (2020): 1123-1125. doi:10.2105/AJPH.2020.305784 accessed at Broadband Internet Access Is a Social Determinant of Health! - PMC (nih.gov)

[28] Summary of the FCC's Connect2HealthFCC Task Force's (C2H Task Force) *Advancing Broadband Connectivity as a Social Determinant of Health Initiative* accessed at Studies and Data Analytics on Broadband and Health | Federal Communications Commission (fcc.gov).

[29] What is a Health Center? | Bureau of Primary Health Care (hrsa.gov)

[30] State of Minnesota: Digital Opportunity Plan DRAFT p 16

[31] State of Minnesota: Digital Opportunity Plan DRAFT p 20

[32] State of Minnesota: Digital Opportunity Plan DRAFT p 19

3. Prioritize online safety for all Minnesotans.

Our organizations share the state's belief that all residents should have access to trusted providers of digital skills training, including cyber security training, as stated in goal 2, "All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity."[33]

However, the strategy to meet this goal is puzzling: "Collaborate with internet service providers who are receiving state and federal infrastructure funds to ensure newly connected households understand the basics of cybersecurity."[34]

Feedback we have received about online safety and cyber security highlight its importance for all residents not just the newly connected, as well as the value of trusted messengers in helping people change behaviors.

Although our organizations value what internet service providers can accomplish as partners and broadband providers, they are not always suited to be the primary advocates and educators on online safety, especially for people with limited English proficiency. Residents frequently complain about ISPs' service quality, upselling, and customer service. In addition to what we have heard, the draft plan notes that people of color are more likely to rely on a cellular data plan and experience service interruptions because they were "unable to get the technical support they needed from providers. This is likely due to language barriers, cultural barriers, and racial aggressions."[35]

State and local government, schools, libraries, and community-based organizations are more trusted than internet service providers. We urge the state not to overly rely on internet service providers to ensure all residents understand how to keep themselves and their data protected. At the very least, the goal of keeping Minnesotans safe online should be carried out by more than one group of stakeholders.

The plan may assume that the entities receiving grant funding for digital navigation will provide this training as well and outline those expectations in a forthcoming RFP or technical assistance plan. We have noted gaps in available training materials for English language learners develop digital skills and safe practices online. That could be an area for statewide collaboration and information sharing.

Finally, the proposed goal for 95% of people from covered populations comfortable identifying and mitigating cybersecurity issues[36] seems unrealistic without any identified baseline metrics. It may be intended to be a 95% increase in covered populations who feel proficient.

Recommendations:

- We encourage OBD to explicitly include online safety training as part of the expectation for entities providing digital navigation services.
- We recommend that training materials and best practices for cybersecurity and online safety are shared amongst Digital Connection Committees and that the funding be made available for

[33] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[34] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[35] State of Minnesota: Digital Opportunity Plan DRAFT p 49
[36] State of Minnesota: Digital Opportunity Plan DRAFT p 21

translation and interpretation to ensure this information is accessible to all Minnesotans, including people with low literacy and/or limited English proficiency.

- We encourage OBD to review the key performance indicators for this goal.

4. All Minnesotans should have access to a trusted provider of quality technical support.

Our organizations support OBD's goal 1.3 that "All Minnesotans have access to a trusted provider of quality technical support."[37] For residents seeking support or repair for their home internet connection, personal device, or other technical issue there are limited options.

The underlying strategies, however, may not address the needs of most residents in the near term:

> a. Develop curriculum and administer grants designed to support high schools, after-school programs, and 2-year public and tribal colleges in hiring and training students to work part-time as paid tech repair technicians.
> b. Administer grants to small businesses to assess their technology needs and improve their technology access. [38]

The proposal to explore a statewide help line, outlined in strategy 1.2d, better aligns here and could be a plausible strategy to meet this need. [39] However, the final outcome is to a receive a report.[40] We would support working to implement this idea if feasible, especially if interpretation could be provided for residents who are not proficient in English.

Proposal 1.3b: *Administer grants to small businesses to assess their technology needs and improve their technology access*[41], is interesting and Hennepin is aware of the technology challenges facing small businesses. We note that this idea would not make technical support available to all residents and may exclude the nonprofits and religious organizations that are often in need of technology assistance. According to the Minnesota Council of Nonprofits, in 2021 nonprofit organizations employed 14% of the state's workforce.[42]

Plans to develop and implement technical training programs in high schools are a starting point and an exciting idea but offer no immediate support to Minnesotans lacking technical support.

Recommendations:

- We encourage OBD to implement a statewide help line with interpreter services available if the research into this idea demonstrates its viability.
- We encourage OBD to clarify whether nonprofit organizations are eligible for technology grants.

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[37] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[38] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[39] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[40] State of Minnesota: Digital Opportunity Plan DRAFT p 24
[41] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[42] 2020 - 2021 MINNESOTA NONPROFIT ECONOMY REPORT p 4 accessed at 2020-21-minnesota-nonprofit-economy-report.pdf (minnesotanonprofits.org)

5. Recognize the digital divide impacting apartment and other multi-dwelling units with action.

Our organizations appreciate the acknowledgement of a unique digital divide impacting residents of apartments and mobile home parks.[43] 38% of Hennepin County households are renters, totaling an estimated 200,000 households.[44]

The proposed partnership with Education SuperHighway and local housing partners is a promising start and we support this collaboration.[45] The BEAD plan also references this collaboration: "OBD brought together ESH, Hennepin County's Office of Broadband and Digital Inclusion and the University of Minnesota's Urban Research and Outreach-Engagement Center to work towards addressing broadband availability in MDUs under ESH's Free Apartment Wi-Fi program."[46]

However, there is no work identified other than convening a working group to meet quarterly[47] and there are no associated key performance indicators to measure progress. Is OBD's assumption that projects related to internet access for this housing stock can be funded through another source? **We urge OBD to underwrite this goal by making its BEAD funding available for this crucial program.**

It is unclear whether the digital opportunity goals for broadband adoption and access set forth in this plan can be accomplished without addressing the connectivity gaps that persist in multi-family housing. OBD notes that people of color are far more likely to be impacted by these issues than white Minnesotans:

> People from minoritized racial and ethnic groups are more likely to be renters than White people. In Minnesota, 19.5% of White Minnesotans are renters. This rate increases to 69.5% for Black Minnesotans, 50.9% of Indigenous Minnesotans, 34.6% of Asian Minnesotans, 62.4% of Minnesotans of an unspecified minoritized race, 41.8% of multi-racial and multi-ethnic Minnesotans, and 50.8% of Hispanic or Latino Minnesotans.[48]

If digital opportunity cannot be extended to residents of multifamily apartments, and those same people are more likely to belong minoritized racial and ethnic groups, can we achieve digital equity absent meaningful solutions to this problem?

There are policy changes that could be recommended to accomplish the goal of interest for all. We recognize that OBD believes policy changes are outside of their bailiwick[49] and thus are not detailing recommendations here. However, **digital opportunity exists within the context of deliberate, historical under-investment in communities of color. We urge OBD to recognize that current policies may reinforce rather than dismantle this digital divide.**

Recommendations:

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[43] State of Minnesota: Digital Opportunity Plan DRAFT p 74
[44] ACS 1-Year Estimates, 2022 accessed at DP04: Selected Housing Characteristics - Census Bureau Table
[45] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[46] BEAD Five-Year Action Plan p 11
[47] State of Minnesota: Digital Opportunity Plan DRAFT p 26
[48] State of Minnesota: Digital Opportunity Plan DRAFT p 52-53, 74-75
[49] State of Minnesota: Digital Opportunity Plan DRAFT p 8

- We urge OBD to allocate a portion of its BEAD dollars to address the digital divide in multi-family apartments and mobile home parks in order to meet their digital equity goals.
- We encourage OBD to incorporate findings from ARPA-funded pilot apartment Wi-Fi projects and ACP outreach efforts into policy recommendations to extend affordable, reliable internet access and digital opportunity to all Minnesotans.

6. Balance research and planning with implementation.

Our organizations appreciate the desire to meaningfully plan and capture data to inform future decisions. However, the draft plan is very heavy on research, reports, establishing workgroups, and creating local plans. All of these are valuable efforts; however, they appear to have a disproportionate focus at the expense of implementing current or future plans, or outcomes that may be driven by proposed working groups.

To the extent that the draft Plan is a guide to future funding provided to OBD via NTIA's capacity grant program, we are concerned about a lack of clear recommendations for the specific, proven activities noted above. If, for example, we share a belief that digital navigation, device provision and online-safety training make demonstrable improvements in our community's digital ecosystem, then we hope that they would be funded via capacity grants, and specifically noted in the Plan.

OBD will commission four studies, in addition to expanding the available digital opportunity data:

- **Prepare a report** that explores models for a statewide technology assistance helpline.[50]
- **Prepare a report** that explores potential models for a statewide program similar to ACP and Lifeline to reduce internet costs for low-income Minnesota households.[51]
- **Research models** for a statewide program similar to ACP that offers a device discount for low-income Minnesotans.[52]
- **Prepare a report** that explores sustainable state-managed system for circulating large-screen devices as long-term loans through collaborating public programs.[53]

OBD proposes four new working groups, in addition to the Digital Opportunity Leaders Network and Digital Connection Committee structure, with quarterly meetings as the only proposed output:

- Convene an inter-agency digital opportunity workgroup with appointed membership from state agencies representing key partners and covered populations[54]
- Collaborate with MN Housing, Education SuperHighway, North Country Service Cooperative, and other housing partners[55]
- Collaborate with MN Department of Corrections and the MN Career Education Center[56]
- Collaborate with DEED's Office of New Americans[57]

[50] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[51] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[52] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[53] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[54] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[55] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[56] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[57] State of Minnesota: Digital Opportunity Plan DRAFT p 20

The outcome in each of these instances is the creation of a report or a final meeting. Many of these proposed collaborations, research efforts, and partnerships appear relevant. However, the lack of meaningful goals or objectives is worrisome.

There is a risk that all these outcomes are met without meaningful improvement in the stated digital opportunity key performance indicators that relate to residents' access to devices, high speed home internet, and digital literacy and skills. Will Minnesotans believe that funding research and staff meeting time at the expense of programming is a prudent use of one-time federal funding?

We urge the state to focus on funding implementation rather than creating a library of reports without corresponding action. We are hopeful that the activities to meaningfully plan Minnesota's digital opportunity programs leads to the swift funding and implementation of proven solutions.

Recommendations:

- We urge OBD to focus on funding proven solutions such as digital navigation to sustain and expand the progress already made towards digital equity.
- We encourage research and reports to be matched with recommendations for action, or for proposed policy changes to meet our shared goal of "a future where **digital equity connects all Minnesota residents to opportunities, options, and each other."**[58]

[58] State of Minnesota: Digital Opportunity Plan DRAFT p 6

September 29, 2023

Bree Maki
Executive Director, Office of Broadband Development
Minnesota Department of Employment & Economic Development
Via Electronic Delivery

Re: Feedback on the Minnesota Draft Digital Opportunity Plan

Dear Ms. Maki:

We appreciate the opportunity to provide input to the Minnesota Draft Digital Opportunity Plan, and we're grateful for the leadership of your office and the Biden Administration in working to build digital equity for all Minnesotans. The unprecedented funding provided by the IIJA in ensuring "Internet for All," across urban, suburban and rural areas of our state, is a crucial opportunity. As our jurisdictions are home to more nearly one-third of all Minnesotans, we want to ensure that the final Plan guides the forthcoming federal funds in ways that adequately address the critical needs of every resident. Our staff have written separately to provide important details in this regard.

We urge you to include in the final Plan a clear recognition of two factors that we do not see adequately addressed in the Draft Plan:

1. **As each of our county boards have recognized racism as a public health crisis, it is important for the final Plan to view digital opportunity within the context of deliberate, historical under-investment in communities of color.** When broadband access closely tracks historical redlining, and adequate broadband infrastructure is also glaringly lacking—as has been documented[1] recently[2]—we urge the State to partner with us and fund the work that addresses unique injustices that were decades in the making and whose effects are evident to this day. We are concerned that the Draft Plan's proposals for noncompetitive grants will minimize the overall impact of the Digital Equity Act in Minnesota. Given the disproportionate negative impacts of the Digital Divide in our communities, we urge your office to provide disproportionate support to help eliminate them.

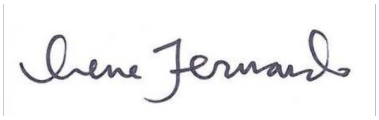
2. **The State should support the best practices and new digital inclusions programs that we have piloted during the pandemic and recovery period.** We have taken the CARES and ARP periods as an opportunity to develop pilot programs and stand-up best practices for digital equity. We do not see our one-time investments as a substitute for the five-year program that your office is developing for the State, and we echo what you have heard elsewhere: the final Plan should clearly identify that State funding will be allocated for programs that have positively affected thousands of our residents since the beginning of the pandemic, and should be continued, as

[1] https://sahanjournal.com/business-work/century-link-internet-speed-minneapolis-redlining-black-brown-broadband/
[2] https://www.startribune.com/in-minneapolis-disparities-in-internet-package-speeds-can-depend-on-address/600227834/

opposed to over-leveraging capacity dollars for continued research, planning and facilitation. We hope to join you in looking back at the Digital Equity Act as a catalyst for connecting Minnesota, not as a tool for studying strategies that are already known to be effective.

The work your office has done to form and gather digital connection committees, forge partnerships, create plans and conduct research is important. At the same time, we urge you not to lose sight of the results our organizations have achieved through proven strategies and localized community recommendations that warrant specific mention in the final Plan, and funding from an historic infrastructure law. We are proud of our achievements to date, and we are looking to your office to support continued efforts as we work together to achieve Internet for All Minnesotans.

Sincerely,



Irene Fernando, Chair
Hennepin County Board of Commissioners

Trista Martinson, Chair
Ramsey County Board of Commissioners

Bradley Werner
Attorneys at Law

September 27, 2023

Office of Broadband Development
Attn: Ms. Hannah Buckland, Digital Opportunity Plan
Great Northern Building
180 5th St. E
St. Paul, MN 55101

Re: Comments on Draft Digital Opportunity Plan

Dear Ms. Buckland:

Attached are Comments on the draft Digital Opportunity Plan from the following Minnesota municipal entities, with a collective population of over 1.2 million:

- City of Minneapolis;
- Northwest Suburbs Cable Communications Commission;
- North Metro Telecommunications Commission;
- South Washington County Telecommunications Commission;
- North Suburban Communications Commission;
- City of Coon Rapids; and
- City of Columbia Heights

We would welcome the opportunity to speak with you further as you continue your drafting.

Very Truly Yours,

BRADLEY WERNER, LLC

Michael R. Bradley

c. Ms. Greta Bergstom
Ms. Shannon Slatton Schwartz
Ms. Heidi Arnson
Mr. Mark Martinez
Mr. Jeff Ongstad
Mr. Eric Stouse
Mr. Will Rottler

Local Governments' Digital Opportunity Plan Comments

These comments on the Office of Broadband Development's ("OBD") Digital Opportunity Plan are submitted on behalf of the city of Minneapolis, Minnesota; Northwest Suburbs Cable Communications Commission; North Metro Telecommunications Commission; South Washington County Telecommunications Commission; North Suburban Communications Commission; City of Coon Rapids, Minnesota; and City of Columbia Heights (collectively, the "Local Governments"),[1] These jurisdictions and organizations represent a diverse range of residents with a population exceeding 1,236,952. The Local Governments support OBD's goal of ensuring all Minnesotans have equal access to broadband services. We have decades of experience working toward similar goals by requiring universal buildout of networks and providing consumer protection and other public benefits through the cable franchising process. The Local Governments stress the importance of OBD partnering with local governments to leverage our extensive experience and local resources as a critical step in ensuring the Digital Opportunity Plan fulfills its goals.

Many of the Local Governments made the following recommendations to OBD prior to release of the draft Digital Opportunity Plan:

1. Recommend the use of local franchising for ensuring equal access to broadband service throughout the state;
2. Recommend that broadband providers using public property should provide public benefits to further the goals of digital equity in the state; and
3. Recommend necessary changes in state and federal law to ensure state and local governments have the necessary authority to achieve digital equity in the delivery of broadband service.

[1] The commenting Minnesota municipal entities and their populations are: City of Minneapolis, (425,096); Northwest Suburbs Cable Communications Commission (collective population 356,048) (a Minnesota municipal joint powers commission consisting of the cities of Brooklyn Center (33,782), Brooklyn Park (86,478), Crystal (23,330), Golden Valley (22,552), Maple Grove (70,253), New Hope (21,986), Osseo (2,688), Plymouth (81,026), and Robbinsdale (13,953)); North Metro Telecommunications Commission (collective population 129,470) (a municipal joint powers commission consisting of the cities of Blaine (71,803), Centerville (4,027), Circle Pines (5,025), Ham Lake (16,843), Lexington (2,922), Lino Lakes (21,753), and Spring Lake Park (7,097)); South Washington County Telecommunications Commission (collective population 125,863) (a municipal joint powers commission consisting of the municipalities of Woodbury (75,102), Cottage Grove (41,027), Newport (3,941), Grey Cloud Island Township (249), and St. Paul Park (5,544)); North Suburban Communications Commission (collective population 115,117) (a municipal joint powers commission consisting of the cities of Arden Hills (9,939), Falcon Heights (4,963), Lauderdale (2,212), Little Canada (10,819), Mounds View (12,946), New Brighton (23,454), North Oaks (5,273), Roseville (36,254), and St. Anthony (9,257)); City of Coon Rapids (pop. 63,385); City of Columbia Heights (pop. 21,973).

These recommendations are not included in the draft Plan, though they appear to be acknowledged in the following statement regarding the "limitations" of the Plan:

> This plan exists in the middle of a particular kind of tension between what is permissible and what is needed. The gaps in digital opportunity that many individuals confront daily are often a consequence of long-term gaps in federal, state, and local policy that have allowed people to be left behind. For gaps to be closed in the long-term, new federal, state, and local policies need to be in place. Without addressing the inequities built into this system, the same gaps will remerge and persist. It is, however, outside of the purview of OBD to independently recommend policy changes, serve as a regulatory body, or propose regulatory reform.[2]

We urge OBD to reconsider its position that it is "outside the purview of OBD to independently recommend policy changes[.]" OBD has the express statutory authority—and "duty"—to "coordinate with state, regional, local, and private entities to develop … a uniform statewide broadband access and usage policy" and to "develop, recommend, and implement a statewide plan to encourage cost-effective broadband access … ."[3] OBD also must include in its annual report policy suggestions and proposals.[4]

The draft Plan appropriately recognizes that policy gaps hinder OBD's ability to craft a plan to achieve Minnesota's broadband goals. As the State's expert agency on broadband access, OBD should elaborate on those policy gaps and recommend solutions the State could pursue. The lack of local authority to franchise broadband providers is precluding local governments from partnering with OBD to ensure equal access to broadband for all of our residents. We urge OBD to address matter in the Digital Opportunity Plan by, at a minimum, (1) addressing the benefits of local franchising and (2) urging the Legislature to provide authority for local broadband franchising.

Benefits of Local Franchising in Ensuring Broadband Opportunities

We urge OBD to revise the Digital Opportunity Plan to acknowledge that local franchising can help ensure equal access to broadband service throughout the state by requiring that broadband providers using public property provide public benefits to further the goals of digital equity. The Local Governments' original recommendations to OBD establish the benefits of local franchising in ensuring better outcomes for Minnesotans. We will not reiterate those comments here, but urge OBD to review those comments for including in the Plan.

As noted in those comments, this recommendation is consistent with that made by FCC's Communications Equity and Diversity Council ("CEDC"), a federal advisory committee with appointed members from public interest groups, think tanks, and industry organizations. FCC Chairwoman Rosenworcel tasked the CEDC with making recommendations to fulfill the FCC's

[2] Draft Digital Opportunity Plan at p. 8.
[3] Minn. Stat. § 116J.39, subd. 4(a)(2)-(3).
[4] Minn. Stat. § 116J.39, subd. 5(b)(6)-(7).

obligation under Section 60506(d) of the Infrastructure Investment and Jobs Act to "develop model policies and best practices that can be adopted by States and localities to ensure that broadband internet access service providers do not engage in digital discrimination."[5] The CEDC's final Recommendations and Best Practices to Prevent Digital Discrimination and Promote Digital Equity recognize the long-standing efforts of local governments to promote nondiscriminatory access to communications services through franchises and rights-of-way management.[6] The CEDC expressly recommended that "[a]greements to use the rights-of-way should reflect that the privilege of using public assets comes with an obligation to provide a benefit to the public, which includes ensuring that all members of the community have equal access to broadband, subject to economic and technological feasibility."[7]

OBD should follow the CEDC's lead in recognizing the benefits of local franchising and the need for entities enjoying the use of public assets to provide adequate public benefits in return for such use. Local governments are key partners in that effort.

Legislative Changes in Minnesota

We further urge OBD to make an express recommendation to the Legislature to authorize local franchising of broadband providers. This is consistent with the CEDC's recommendation that "States should examine their statutes and policies to ensure broadband providers benefitting from public assets provide appropriate public benefits to address potential digital discrimination."[8] The lack of clear authority in Minnesota law for local governments to franchise broadband providers is a hinderance to providing digital opportunities to all Minnesotans and to preventing digital discrimination.

A clear recommendation in the Digital Opportunity Plan to address this policy gap in Minnesota law would help local governments better partner with OBD in addressing digital equity and digital discrimination. We ask OBD to include such a recommendation in its final Plan.[9]

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[5] 47 U.S.C. § 1754(d).

[6] Recommendations and Best Practices to Prevent Digital Discrimination and Promote Digital Equity at 31.

[7] *Id*. at 35.

[8] *Id*.

[9] The Local Governments continue to recommend other legislative changes described in our original comments, including rolling back the small cell legislation passed in 2017, which has given wireless providers unprecedented access to local assets yet has not resulted in the widespread rollout of fifth generation small cell wireless services providers promised. Further, several FCC rules, such as the Mixed Use Rule and Small Cell Order, interfere with local governments' ability to address broadband-related build-out and services and should be repealed.

Conclusion

The Local Governments applaud OBD for drafting an extensive and thoughtful Digital Opportunity Plan. OBD can and should do more, however, by addressing some of the policy gaps that will preclude any plan from achieving the goal of ensuring all Minnesotans have equal access to digital opportunity. The Local Governments look forward to partnering with OBD on this critical goal.