April 20, 2023

Alan Davidson
Assistant Secretary of Commerce for Communications and Information and NTIA Administrator
National Telecommunications and Information Administration
1401 Constitution Avenue NW
Washington, DC 20230

RE: City of Long Beach Public Comment – Docket Number NTIA-2023-0002

Dear Administrator Davidson,

On behalf of the City of Long Beach (City), I write in response to the National Telecommunications and Information Administration's (NTIA) request for comments related to the Digital Equity Act grant programs (Docket Number NTIA-2023-0002). Equitable access to and use of the internet, technology, digital skills, technical support services, applications, and online content are imperative for being civically engaged, economically empowered, and having great quality of life. The recommendations below aim to strengthen the NTIA's approach to advancing digital equity through the development of the Digital Equity Act funding programs.

The City is taking proactive steps to bridge the digital divide in Long Beach by way of its Digital Inclusion Initiative (Initiative). Under the Initiative, City staff co-developed the City's first Digital Inclusion Roadmap (Roadmap) in collaboration with more than 50 multidisciplinary cross-sector stakeholders and more than 170 Long Beach community members. City staff have been implementing digital equity strategies from the Roadmap using Federal Coronavirus Aid, Relief, and Economic Security Act (CARES Act) and American Rescue Plan Act (ARPA) funding – known in Long Beach as the Long Beach Recovery Act (Recovery Act). With more than $2.4 million in federal funding for digital equity efforts, City staff in collaboration with community partners are implementing a number of digital equity programming activities. Through these and other efforts, the City has been recognized as a multi-year Digital Inclusion Trailblazer by the National Digital Inclusion Alliance for its outstanding achievements in advancing digital equity and inclusion in Long Beach.

Implementing an Equity Lens

As we collectively strive to achieve digital equity as an outcome, we must uplift an equity lens as a process. The City defers to its Equity Toolkit for tangible best practices for applying an equity lens. The City recommends the following best practices to apply an equity lens through the Digital Equity Act grant programs:

- Apply an equity lens to all Digital Equity Act grant programs:
  - Provide a Racial Equity 101 training for all grantees and subgrantees, and share best practices for operationalizing equity as part of the Digital Equity Act grant programs.
  - Use the Spectrum of Community Engagement to ensure that communities have voice, power, and ownership over their State's Digital Equity Action Plan.
  - Partner with trusted community partners to engage communities in the State Digital Equity Plan review and feedback process.
  - Address key community engagement participation barriers (e.g., language, transportation, child watch, cultural, economic, immigration, religious, time, location, and trust barriers).
  - Ensure that State Digital Equity Plans are community-driven and uplift the community's lived experiences, expertise, and ideas.

- Consider the following as eligible digital equity-related activities and projects for the Digital Equity Act grant programs, including but not limited to:
  - Career development services, job preparedness training, and job search services;
  - City-administered or City-led municipal broadband services and other connectivity investments;
  - Community outreach activities that promote digital equity resources and services and support Affordable Connectivity Program promotion and direct enrollment;
  - Community learning hub resources (e.g., free public Wi-Fi, public access computers);
  - English as a second language (ESL) training resources;
  - E-waste services;
  - Free mobile hotspots and computing devices lending, purchasing, and distribution;
  - Multilingual technical support services, digital skills training classes, and digital inclusion navigation support services; and,
  - Paid internet services through the hotspots and public Wi-Fi services.
- Uplift and scale local digital equity efforts from cities and regions as part of the State Digital Equity Plan implementation process and defer to best practices from cities and regions that are part of the National Digital Inclusion Alliance (NDIA) Digital Inclusion Trailblazers honoree list.
- Consider providing Digital Equity Act grant program funding in areas most impacted by the digital divide and continue to fund areas where there are thriving digital equity ecosystems and digital equity plans.

Leveraging Data Collection, Evaluation, and Community Storytelling

In supporting the work of digital equity, it is important to ensure that all focus areas of the digital equity ecosystem are being implemented and measured—not just broadband access, affordability, and adoption. The following are best practices to ensure transparency of digital inclusion programs:

- Look at disaggregated U.S. Census data and other relevant digital equity data sources to determine what communities are most impacted by the digital divide and in need in that state.
- Collect, analyze, measure, and report on key equity outcomes, metrics, and outputs (e.g., race/ethnicity, zip code, language, age, gender, disability, income, socioeconomic status, and educational attainment).
- Use a variety of data collection methods to track equity outcomes, metrics, and outputs (e.g., real-time forms, questionnaires, surveys, interviews).
- Define the success of Digital Equity Act grant programs through both equity-centered performance indicators, such as total devices distributed disaggregated by race/ethnicity or zip code, and population-level indicators, such as unemployment rate and graduation rate disaggregated by race/ethnicity.
- Use a data dashboard to display community impact (e.g., Long Beach Recovery Act Dashboard) and standardize the equity outcomes, metrics, and outputs of semi-annual reporting.
- Uplift community impact through community-centered storytelling (e.g., art, music, dance, photos, and success stories).

Strengthening Community Partnerships

Empowering community partners and uplifting grassroots efforts is another strategy to advance digital equity. Trusted community partners and government entities are integral to the development, implementation, and evaluation of digital equity programming and activities. Digital Equity Act grant programs should invest in developing the capacity of community partners to engage with communities, businesses, and non-profits that need digital equity resources and services in the following ways:

- Allocate resources for programs that support:
  - Services directly to communities that are home-bound through direct in-person home visits and support direct shipping, handling, and delivery of technology hardware;
  - Strengthen capacity-building for trusted community partners by providing compensation and financial resources to engage communities in the State Digital Equity Plan review and feedback.
  - Trusted community partners who provide direct troubleshooting through digital inclusion navigation services via in-person, phone, text messages, and virtual; and,
  - Ride-share resources that provide direct transportation to communities receiving Digital Equity Act grant programs resources and services.
- Expand eligibility requirements and documentation for businesses and non-profits who need digital equity resources and services.
- Collaborate with the U.S. Department of Veterans Affairs (VA) to connect veterans to Digital Equity Act grant programs resources and services.
- Streamline processes for Digital Equity Act grant programs reporting to reduce administrative burdens on subgrantees, especially trusted community partners.
- Require routine meetings with grantees and subgrantees to share best practices, resources, and lessons.
- Collaborate with workforce development entities and provide career development and job search assistance resources when administering digital equity-related services.
- Collaborate with opportunity youth-serving organizations and provide supportive services, career coaching, employment preparation, and training through digital equity-related job opportunities.
- Develop a real-time interactive online digital equity ecosystem map in each state that allows trusted community partners to connect communities to Digital Equity Act grant programs.
- Expand eligibility requirements and documentation for free and low-cost broadband internet services.
- Include immigrant communities as a covered population in the Digital Equity Act grant programs.

Thank you for your consideration of these important priorities in developing, implementing, and evaluating Digital Equity Act grant programs. If you have any questions, please do not hesitate to contact Tyler Bonanno-Curley, Manager of Government Affairs, at 562-570-5715 or Tyler.Curley@longbeach.gov.

Sincerely,

THOMAS B. MODICA
City Manager

cc: Senator Dianne Feinstein
        Senator Alex Padilla
        Congressmember Robert Garcia, California 42nd Congressional District
        Congressmember Nanette Barragán, California 44th Congressional District