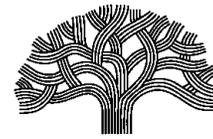


CITY OF OAKLAND



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Office of the Mayor, Libby Schaaf

January 26, 2021

The Honorable Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Dear Secretary Dortch,

We at #OaklandUndivided write to encourage the Federal Communications Commission to structure the upcoming broadband program in a way that will reach the greatest number of families in need, and in tandem with the wonderful municipal and nonprofit organizations already doing important work in this area. In order to achieve both of these things, we strongly recommend that the program be structured with flexibility as a key component.

As a partnership of the City of Oakland, Oakland Unified School District, and key community nonprofits, #OaklandUndivided has worked to ensure that every child in need has access to the tools they need to learn and thrive: internet, computers, and tech support. In addition, #OaklandUndivided is in deep partnership with T-Mobile to provide internet access to our most vulnerable residents; they have been a key partner in support of the contents of this letter. We have raised over \$13M from philanthropy and private donors, spending over \$3 million over the past year to provide T-Mobile internet hotspots to over 10,000 of Oakland's school-age children. Additionally, we have spent \$8.5 million to provide 33,000 computers to children and over \$2 million to provide necessary technical support to ensure students and families have the resources needed to effectively use these devices and services.

Our success has also helped underscore best practices, and most importantly, what doesn't work for these vulnerable communities. We humbly make the following policy recommendations:

- **In addition to broadband, ensure internet hotspots are eligible to be reimbursed, including the cost of the hotspot device.** One way we have found the most success in Oakland is through the distribution of internet hotspots to households in need of internet service to ensure children are able to attend school. This simplifies distribution and makes it easier to engage with children who are not tied to a specific household and may otherwise fall through the cracks, like unhoused children, children in the foster care system, and those where broadband just simply isn't available. We encourage the FCC to embrace dynamic solutions like internet hotspots and ensure that they are eligible for reimbursement, including being eligible for the up to \$100 device reimbursement currently reserved for desktop, laptop, or tablet computers.
- **Permit reimbursement for funds already committed.** Children have unmet learning needs now – and the purchasing and distribution process takes time. We encourage the

FCC to identify ways to reimburse entities who have already committed funds, so students can get resources quicker and that money can be immediately used for additional purchase commitments.

- **Permit reimbursement for upgraded internet speeds.** In many cases, Oakland children have access to the internet in some way, but do not have access to reliable internet speeds that can handle the video conferencing needed for students to attend school remotely. Existing programs to provide new internet services overlook the needs of these students. We urge the FCC to make upgrades to speeds less than or equal to 25 Mbps download speed/10 Mbps upload speed eligible for reimbursement.
- **Permit municipalities and nonprofits with established programs and networks to apply for reimbursement.** Our work in the home internet space predates the coronavirus pandemic. Over the course of several years, we have extensively engaged with internet service providers to negotiate important, below-market rates for Oakland's neediest families. Entities in other cities have done similar, important work. Engaging with internet service providers only, and not acknowledging the additional resources contributed in this space, gives corporations additional profits while leaving harder hit municipal and nonprofit entities struggling. We urge the FCC to identify ways to incorporate these critical structures into the broadband reimbursement program, and establish guardrails to ensure that internet service providers at least share the reimbursement with their key community partners.
- **Permit connected device (i.e. desktop, laptop, or tablet computer) distributors to apply for reimbursement.** We have learned through our efforts at #OaklandUndivided that in order for a student and family to have access to the digital resources necessary to learn and work from home, three things are needed: affordable, high speed internet, a connected device that isn't simply a phone, and ongoing technical support. Without a connected device, students and families will not be able to access life saving resources during this pandemic that the internet would afford them. We have seen that roughly 20% of families nationwide are without connected devices to access online learning. We encourage the FCC to identify ways to incorporate device vendors into the broadband reimbursement program who are willing to provide connected devices to families in need.

We thank you for setting up such a much-needed program, and would welcome a longer discussion on our significant work on the ground in Oakland.

Sincerely,



Libby Schaaf, Mayor of Oakland