

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the)
Commission's Own Motion to Comply with)
the Mandates of Senate Bill 1563 Regarding)
Deployment of Advanced Telecommunications)
Technologies.)

R. 03-04-003

**MOTION BY LATINO ISSUES FORUM AND THE CALIFORNIA COMMUNITY TECHNOLOGY
POLICY GROUP TO EXPAND COMMUNITY MEETINGS AND OUTREACH, INFORM
COMMISSION PLAN WITH INPUT FROM BLUE RIBBON PANEL AND TO SCHEDULE
HEARINGS BEFORE THE COMMISSION**

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INTRODUCTION: The Digital Divide Is Increasing For Underserved Communities With Dire Educational and Employment Ramifications for California - - Two Million Jobs Are at Stake and \$ 376 Billion

Pursuant to Rule 45 of the Commission's Rules of Practice and Procedure, Latino Issues Forum ("LIF") files the instant motion on behalf of itself and the California Community Technology Policy Group ("CCTPG") which is a coalition of diverse community-based and statewide organizations located throughout California.¹

The CCTPG includes: Advanced Policy Institute (UCLA), Alliance for Technology Access (statewide), Amador-Tuolumne Community Action Agency (Sonora), Break Away Technologies (Los Angeles), Bresee Foundation (Los Angeles), Casa Familiar (San Isidro), Central Valley Digital Network, Great Valley Center (Central Valley), Community Digital Initiative (Riverside), Community Partners (statewide), Community Technology Policy Council (statewide), Community Development Technologies Center (Los Angeles), CompuMentor (national), C.T. Learning, Inc. (Fresno), Desert Oasis Community Computer Center (El Centro), Eastmont Computer Center (Oakland), Firebaugh Computer Learning Center (Firebaugh), Great Valley Center (Central Valley), Happy Camp Community Computer Center (Karuk Tribe of Northern California), Latino Issues Forum (statewide), Little Tokyo Service Center (Los Angeles), Plugged In (Palo Alto), Plumas County Public Health Agency (Plumas County), PolicyLink (national), San Diego Community Technology Group (greater San Diego), Santa Barbara City College - Continuing Education Division (Santa Barbara), Service Employees International Union (Western Region), Street Tech (San Pablo), Sunset Neighborhood Beacon Center (San

¹ The California Community Technology Policy Group ("CCTPG") includes representatives from diverse community-based and statewide organizations located throughout California. Its goal is to advocate for policies that assure underserved communities reap the economic, educational, health and civic benefits offered by computers, the Internet, and new digital innovations. CCTPG was formed as the Computers in Our Future Policy Group in 1998 and expanded its steering committee in 2001. Its knowledge and expertise about what is needed comes from many years of on-the-ground experience providing access and opportunities to learn to use technology to tens of thousands of low-income residents across California. The CCTPG uses its experience in local communities to advocate for the most effective ways to direct resources to low-income communities so residents gain access to computers, the Internet, technology skills training, and the ability to use technology tools to meet life's daily needs.

Francisco), The Children's Partnership (national), Women's Economic Agenda Project (Oakland), Community Technology Organizing Consortium (greater Los Angeles) and Community Technology Network of the Bay Area (Bay Area).² The CCTPG Steering Committee Roster is appended hereto as Exhibit A.

The CCTPG and LIF file this motion to bring three critical issues to the attention of the California Public Utilities Commission (hereafter "Commission") in its endeavor "to develop a plan for encouraging the widespread availability and use of advanced communications infrastructure."³ LIF and CCTPG submit that widespread broadband and advanced communications infrastructure should be treated at a level of priority akin to California's other key infrastructures -- such as K - 20 public educational institutions, roads, transportation and aqueducts -- because of its importance to the State's continued economic, health and educational vitality. LIF and CCTPG also submit that the status of advanced communications infrastructure and its fundamental role for underserved communities throughout California have evolved dramatically since the Commission undertook its previous study two years ago.⁴

² This is a partial listing of the membership; the CCTPG Steering Committee Roster is attached hereto as Exhibit A.

³ The Commission proceeding on AB 1712, codified as Section 871.7 of the Public Utilities Code, focused on the feasibility of including advanced technologies as part of basic service under the Universal Telephone Service Act. SB 1563, in contrast, addresses the broader policy issue of how to develop a **plan** for ubiquitous state-of-the-art technologies for rural, inner-city, low-income and disabled Californians to bridge the "digital divide." LIF and CCTPG believe that it is incumbent on the Commission to create a blueprint on how advanced technologies can be brought to underserved communities to promote economic growth, job creation, educational opportunities, health and social benefits.

⁴ In AB 1712, LIF took the position that the Commission should protect the integrity of the ULTS fund from market gaming or depletion while planning for eventual long-term ubiquitous deployment of advanced technologies in all California communities, especially low-income and immigrant. To achieve this goal, LIF recommended the creation of a blue-ribbon panel of experts, as other states have created, to plan for sequential and wise deployment of advanced technologies while remaining technology-neutral and preserving the integrity of the ULTS fund.

Several recent studies, published after the AB 1712 proceeding, have reported on the number of jobs that could be created in the next three years if regulators encouraged the expansion of broadband. The Alliance for Public Technology, for example, reported that an estimated 73,500 jobs could be created in several years with regulatory encouragement of

A plan should be developed now, as SB 1563 contemplates, to address community needs and demands for broadband as a way to create new economic, health and educational opportunities. With all due respect, LIF and CCTPG believe that the five scheduled Commission meetings and questionnaire, while a good start, are insufficient in and of themselves to develop the required plan for widespread and ubiquitous advanced communications structure. In particular, the questionnaire will not garner the responses that the Commission desires and needs. Thus, LIF and CCTPG file the instant motion requesting a three-pronged approach to meeting the legislative mandates of SB 1563.

LIF and the signatories it represents file the instant motion to: **(1)** expand the public meetings to existing regional technology centers around the state who can serve as hosts and assist the Commission with outreach to diverse communities; **(2)** appoint a Blue-Ribbon task force to advise the Commission on its plan and, perhaps, conduct its own survey since we believe that the Commission instrument, however well-intended, will not gather the desired information; and **(3)** schedule evidentiary hearings, or at least an *en banc* hearing before the full Commission, so that top experts can assist in developing a full record regarding what local communities actually need in terms of broadband, advanced communications technologies and choice in communications infrastructure.⁵

Because California's access to health care as well as business and educational success in the 21st century are dependent on advanced communications infrastructure reaching all communities -- especially currently underserved ethnic, rural, disabled and language minority

advanced technology deployment. The State Broadband Index by TechNet examined state policies and ranked states based on whether or not they had formal broadband plans for the future; California ranked 14th because it lacked a plan. Likewise in One Gigabit or Bust Initiative by the Corporation for Education Network Initiatives examined opportunities and benefits that would result from accelerated broadband deployment and estimated that California's gross state product could increase \$ 376 billion and two million jobs could be created over ten years with the right policies in place.

⁵ LIF raised the issue of hearings or *en banc* hearings at the Prehearing Conference. See footnote 7 below.

ones --, LIF and CCTPG urge the Commission to devote the necessary time and resources to develop a full and robust record and subsequent plan in this proceeding, one that is informed by the best minds in the California. As the studies in footnote 4 document, nothing less than two million jobs and \$376 billion in increased state domestic product are at stake.

I. THE COMMISSION SHOULD EXPAND ITS CURRENT PUBLIC MEETINGS SCHEDULE TO ESTABLISHED REGIONAL TECHNOLOGY CENTERS WHERE THERE CAN BE OUTREACH TO COMMUNITY MEMBERS MOST KNOWLEDGEABLE ABOUT EXISTING AND FUTURE COMMUNITY INFRASTRUCTURE NEEDS

First, LIF and its community partners wish to recognize existing Commission efforts with respect to scheduled public participation meetings in five separate venues around California. We view these meetings as a good beginning. However, the scheduled times and locations both pose obstacles for meaningful community participation, since many community members most knowledgeable about existing and future technology needs did not become aware of the scheduled meetings. Even those who were aware may not have been able to travel and spend time during a workday. Additionally, many of the community members most knowledgeable about communications infrastructure needs of underserved communities are limited-English speaking or monolingual in a language other than English. Other community members are intimidated about Commission processes and formalities and are hesitant to come to a Commission-sponsored event held in State buildings.

Thus, LIF and its community partners urge the Commission to schedule additional meetings around the state at existing community technology centers. These centers are well aware of current and future community needs and are attuned to distinct language and cultural sensitivities of different community members. The regional technology centers would be happy to assist Commission staff in scheduling some meetings at their centers, as well as assisting in outreach to the community in appropriate languages. Regional community technology centers have facilities, such as auditoriums, that they could make available to the Commission at no cost. Utilizing the strong relationships that regional technology centers have

with local community based organizations ("CBOs"), the Commission should host meetings or workshops in regions that have low broadband penetration, namely rural and inner-city communities. We suggest some of the following venues:

- San Isidro: Casa Familiar
- South Central Los Angeles Area: Carecen
- Firebaugh: Firebaugh Computer Learning Center
- San Francisco Area: Arriba Juntos
- Sonoma County: Sebastopol Community Center

LIF and the CTPPG would be happy to assist the Commission in scheduling these meetings and in informing local communities about the dates.

II. THE COMMISSION SHOULD EXPAND ITS SURVEY BY APPOINTING A BLUE RIBBON PANEL TO ADVISE THE COMMISSION ON A PLAN AND, IF NECESSARY, CONDUCT ITS OWN SURVEY OF COMMUNITY NEED WITH RESPECT TO COMMUNICATIONS INFRASTRUCTURE

Nothing less than California's potential economic, health and educational infrastructure is at stake. With such enormous implications for the state, the Commission's plan for the future should be informed by the best minds. LIF and its partners view the Commission-sponsored meetings around the state -- including those at regional technology centers -- and input by a Blue-Ribbon panel as complementary.

SB 1563 specifically mandated that the Commission encourage CBO participation in this proceeding, especially that of community technology programs.⁶ In the past, very few community technology programs participated or submitted comments because they either did not know about the proceeding or found the process too intimidating. If community technology

⁶ Section 709.3(a)(1) provides that "[t]he proceeding shall encourage participation that includes a broad cross section of the communications industries ... as well as users and community representatives. The commission shall also encourage participation by community-based organizations, including, but not limited to, nonprofit community technology programs and libraries that have demonstrated success in assisting low-income residents in bridging the digital divide."

centers host some of the Commission's meetings on their premises, at no cost to the Commission, and conduct outreach to their members, the technology centers believe they can generate meaningful and diverse input for Commission staff. Directly involving CBOs will begin to create awareness that the Commission is open to working with the community and hearing its comments. The CCTPG members listed above at pages 2 - 3, who constitute a partial listing of membership, are a good beginning in terms of access to community input.

At the same time, the Commission should create a Blue-Ribbon Task Force that includes telecommunications experts and community members who provide technology services to underserved communities. The Task Force would help to address and advise the Commission on major issues necessary to develop the plan required by SB 1563. The mission of the Task Force would be to advise the Commission on a plan that will:

"[I]dentify factors preventing the ubiquitous availability and use of advanced communications services, assess the consequences of, and develop strategies for, addressing these factors while encouraging the deployment of adequate investment for advanced communications infrastructure that serves the public good and is consistent with the policies described in Section 709."

More specifically the Blue-Ribbon Task Force should: (1) study and assess the availability and cost of current broadband platforms and other advanced technologies; (2) examine and develop policies to deploy broadband and other advanced technologies more ubiquitously; (3) address jurisdictional issues as well as issues of competing technologies; and (4) recommend strategies to increase broadband or other advanced communications penetration rates and usage, particularly among language minority, inner-city, rural, disabled, and other underserved communities. The Blue-Ribbon panel could present its specific recommendations to the Commission either in evidentiary hearings or in a special *en banc* hearing of all five Commissioners.⁷

⁷ At the Prehearing Conference held on September 15, 2003, Ms. Brown, representing LIF, stated:

"...We participated in the AB 1712 proceeding. And while we did not disagree with the outcome on that, we do feel that the Commission still lacks a plan for the future. I think it would

The members of the Blue Ribbon Task Force should work and share information with Commission staff who are holding the public meetings and workshops. Thus, the recommendations of the Task Force to the Commission would complement and inform the public workshops and meetings, and vice versa. By working together, a comprehensive and practical broadband plan can be created, thereby guiding the State to implement policies to make broadband and advanced technologies available to all.

The Task Force should include members from academia and the community who have first-hand knowledge of how broadband can improve lives and opportunities. These individuals should include:

Dr. Barbara O'Connor of the Alliance for Public Technologies and California State University at Sacramento

Allen Hammond of the Broadband Initiative of California and Santa Clara University School of Law

Arturo Gandara of the Universal Service Task Force and University of California at Davis School of Law

Pat Lanthier of the Great Valley Center

Richard Chabran of the California Community Technology Policy Group

Tom West of Corporation for Education Network Initiatives in California

be a great mistake to have another report without a plan for how broadband and other technologies will be deployed in the low-income context. And I think the Commission should be very aware of the great disparities between middle class white and different ethnicities and different incomes in the use of broadband and other advanced technologies...

[w]e also encourage the Commission to consider an advisory panel, made up of some of the best telecommunications experts in the state, who would function in an advisory capacity, perhaps analogous to the Low Income Oversight Board or ULTS Marketing Board...

Finally, we would ask for a hearing in this matter so that we can develop a full record to both educate the Commission and the Legislature." (Reporter's Transcript at 11 - 12.)

Administrative Law Judge Malcolm replied:

"If you want some kind of hearing, I would like to know exactly what that is... If you think that Commissioners, for example, might benefit from an en banc hearing with people like Arturo Gandara or Barbara O'Connor, then pose that...."

James Lau, Technology Program Manager, The Children's Partnership, and

Ana Montes, Director of Technology, Latino Issues Forum

Speranza Avram, Executive Director, Northern Sierra Rural Health Network

Communications corporations could also name members from regulated and non-regulated industries.

LIF and CCTPG believe that the Commission's survey will not garner the full information that the Commission desires because it is not designed to capture input from community based organizations ("CBOs"), such as community technology programs, health care organizations, schools, and small businesses. The survey asks questions that many CBOs themselves cannot answer, such as broadband penetration rates in their areas. Thus, their lack of response should not be interpreted as lack of interest, but rather lack of comprehensive information.

The Commission, we believe, may wish to develop a second survey instrument that will capture input from representative organizations as opposed to trying to ask community organizations about broadband deployment in their areas. The survey should be distributed electronically to a wide variety of stakeholder groups, through the assistance of representative organizations such as the California State Rural Health Association, the California Primary Care Association, the California Telemedicine and e-health Center, the California Hospital Association, local governments, school associations and small business associations. CBOs should be asked basic and informative information they can answer, such as name of organization, mission, population served, services offered, form of connection to Internet, etc. In addition, the members of the Blue Ribbon panel and others could assist the Commission with addresses for electronic distribution. Alternatively, the Blue Ribbon panel could assist with the design of an instrument for end-users.

III. THE COMMISSION SHOULD SCHEDULE HEARINGS SO THAT ALL PARTIES CAN PRESENT TESTIMONY, BE SUBJECT TO CROSS-EXAMINATION AND DEVELOP A FULL RECORD REGARDING A PLAN FOR UBIQUITOUS BROADBAND AND ADVANCED COMMUNICATIONS DEPLOYMENT THROUGHOUT CALIFORNIA; ALTERNATIVELY THERE SHOULD BE AN EN BANC HEARING FOR THE BLUE RIBBON PANEL AND OTHER EXPERTS

Again, LIF and the CCTPG reiterate the high stakes surrounding this proceeding. The Commission has the onus of developing a plan that will, indeed, bring widespread broadband and advanced communications deployment to underserved communities in California. The economic, health and educational ramifications of succeeding in this mission cannot be overstated.

For this to occur, the Commission should have the benefit of those experts who best understand advanced communications issues and how to move the state forward as SB 1563 envisions. LIF and CCPTG, therefore, urge the Commission to schedule hearings forthwith in this proceeding, or, in the alternative, to schedule an *en banc* hearing with all five Commissioners and the Assigned Administrative Law Judge so that witnesses, including those listed above, could give the Commission the benefit of their knowledge, research and expertise.

LIF broached this idea at the Prehearing Conference and the Administrative Law Judge indicated a willingness to consider either *en banc* or other hearings. (Reporter's Transcript at pp. 17- 18) LIF envisions that hearings should permit experts to: (1) define existing barriers and problems; (2) identify underserved communities in demographic and geographical terms; (3) comment on the state of technology and anticipated advances in the near future; (4) comment on existing successes that the Commission may wish to emulate; (5) discuss jurisdictional issues, and (6) assist the Commission in devising a plan to comply with SB 1563. As footnote 4 notes, California is already losing economic ranking because of its lack of a plan for advanced technology deployment in the future; the time to act is now⁸.

⁸ Advanced technologies are the key to many social benefits, among them: education, healthcare, commerce, access to government services and active participation by citizens in the formation of public policy. Broadband-enabled health applications will have significant impact on future healthcare delivery. It will enable: on-line appointment booking; electronic prescriptions; on-line access to patient records; remote consultation, diagnosis and patient monitoring; and tele-health applications for the continuing education of the medical community. The benefits to improved healthcare delivery are huge. Broadband services can enable improved and timely access to healthcare and support the delivery of health experts to the point of need. This will reduce the number of unnecessary referrals, cut waiting lists and generally make better use of available resources.

IV. THE COMMISSION THROUGH THE BLUE RIBBON PANEL, COMMUNITY MEETINGS AND HEARINGS SHOULD EXPLORE SUCCESSFUL PARADIGMS AND A PLAN FOR THE FUTURE TO LESSEN THE DIGITAL DIVIDE

Increasingly, access to computer technology and the Internet are the *sine qua non* for career and educational advancement. Unfortunately, access to advanced technologies is much more prevalent among whites than among blacks and Latinos. In fact, whites are one and a half times more likely to use computers and two times more likely to use the Internet than are Latinos and blacks.⁹ In a state such as California where Latinos are a third of the population or 11.6 million according to most recent U.S.Census data, the impact of the digital divide has monumental economic, educational and societal impacts.

A. The economic importance of bridging the “digital divide”- - some gaps have doubled in four years

The use of computers and the Internet is rapidly changing the skills employers expect, the way students learn, the way people get jobs, and the way communities solve problems. A Wall Street Journal article noted, " that the ability to use a computer and the Internet is fast becoming a prerequisite for a broad array of jobs."¹⁰ Yet, the most recent report from the Department of the Commerce, *A Nation Online*, documents that while many more Americans are getting connected to the Internet, there is a widening gap among households of different educational, income, racial, geographic backgrounds and disabled individuals.¹¹ The result is that many low-income and disabled communities are being left out of this information revolution and are deprived of the economic opportunity it offers. Growing evidence demonstrates the impact of information technology on the changing world of education, work, and health:

⁹ U.S. Department of Commerce, 2002, "A Nation Online: How Americans are Expanding Their Use of the Internet," URL: <http://www.ntia.doc.gov/ntiahome/dn/index.html>

¹⁰ Yochi J. Dreazen, *Wall Street Journal*. February 4, 2002

¹¹ U.S. Department of Commerce, National Telecommunications and Information Administration (NTIA). *A Nation Online: How Americans Are Expanding Their Use of the Internet*, February 2002

- Half of the new jobs that employ workers without college degrees require daily use of computers, often including use of the Internet, and the income gap between those who use computers on the job and those who do not continues to widen;¹²
- In 2001, the median weekly earnings for workers in technology-oriented occupations was between \$713 and \$1,174, considerably more than the median for all other occupations (\$597);¹³
- Employed Californians who use a personal computer report significantly better health status and significantly lower depression levels than employed Californians who do not use a personal computer.¹⁴

Yet,

- Whites, are one and a half times as likely to use computers and two times more likely to use the Internet as blacks and Latinos;¹⁵
- The gap in computer usage between Latinos and the national average has grown. For example, in 1997, 38 percent of Latinos used computers either at home, work or school compared to 54 percent of the national average—a 16 percent difference. By 2001, that gap grew to 17 percent as only 48 percent of Latinos used computers compared to 66 percent of the rest of the nation.¹⁶ (See Figure 1 below.)
- From 1997 to 2001 the gap for Internet usage for Latinos and the rest of the nation doubled. In 1997, 11 percent of Latinos used the Internet compared to 22 percent of the rest of the population, an 11 percent difference. 4 years later, in 2001, that gap doubled as 54 percent of the rest of the nation used the Internet compared to 32 percent of Latinos—doubling the previous gap from 11 percent to 22 percent.¹⁷ (See Figure 1.)

People with disabilities tend to use the Internet at rates well below the national average.¹⁸

Given that Latinos are nearly one –third of California’s population, according to most recent Census data, the economic and social impact of the current digital divide portend badly for the state unless addressed.

B. The computer and internet usage gap has widened for Latinos.

¹² Yochi J. Dreazen, *Wall Street Journal*. February 4, 2002. See also Frank N. Magid Associates, Inc. Institute for the New California Survey. Los Angeles: Frank N. Magid Associates, 1998

¹³ U.S. Bureau of Labor Statistics, “Current Population Survey,” U.S. Department of Labor Washington, DC, url: www.bls.gov

¹⁴ Institute for Health Policy Studies, the University of California at San Francisco “Work and Health Survey, 1998”

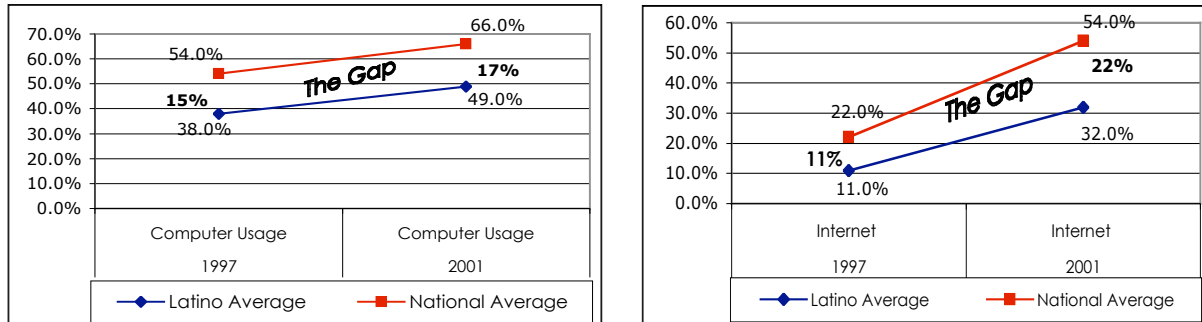
¹⁵ Ibid

¹⁶ U.S. Department of Commerce, National Telecommunications and Information Administration (NTIA). *A Nation Online: How Americans Are Expanding Their Use of the Internet*, February 2002.

¹⁷ Ibid.

¹⁸ Ibid.

Figure 1. Computer and Internet Usage Gap Widens for Latinos (1997-2001)



Source: Department of Commerce (2001) *A Nation Online: How Americans are expanding their use of the Internet* URL: <http://www.ntia.doc.gov/ntiahome/dn/index.html>

C. Examples of salutary model programs in California.

LIF and its community partners are aware of many salutary models of advanced communications successes in under-served communities. They request the opportunity through hearings and comments to brief the Commission on positive paradigms that could be incorporated into the Commission's long-term plan, including ways to encourage funding to replicate these successful models. LIF and CCTPG are firmly convinced that any investment in advanced technology and communications in rural, low-income and underserved communities will have reverberating positive economic, educational, health and social benefits for the entire state.¹⁹

We also note that other states are planning for the future in precisely the manner that LIF and CCTPG suggest by naming special panels to devise blueprints for the future. Clearly a state with the fifth largest economy in the world should be in the vanguard in such planning and vision.

D. Legal and enforcement issues.

¹⁹ Many of the CCTPG members are involved in model technology programs which they could share with the Commission, including Pathways to Our Future, which is a nine-community-based organization pilot has taught technology skills to at-risk youth between the ages of 14 and 18 in central Los Angeles and rural locations, such as Happy Camp. Pathways has demonstrated the tremendous untapped workforce and training potential of youth in low-income communities and produced remarkable results. See, <http://cctpg.org/workforce/pathways-report.pdf>.

LIF has been involved in many of the seminal enforcement cases before the Commission regarding telecommunications, including, but not limited to: Qwest, UCAN v. Pacific Bell, CTS, and the GTE marketing abuse investigation. We are now a lead agency, along with UCAN and Asian Pacific American Legal Center, in the Communities for Telecom Rights project which links us with more than 60 ethnic and language-minority CBOs throughout California. Through a secured website and a common intake process, CBOs have been trained to enter problems regarding telecommunications and advanced technology consumer complaints, as well as to try to resolve the problems themselves with individual carriers and companies. Thus, LIF would like the opportunity to share with the Commission our analysis of billing and service problem resolution, as mandated by Section 709(h). This analysis could be presented during hearings, *en banc* hearings, or in another setting designated by the Commission.

CONCLUSION

Senate Bill 1563, codified as Section 709 of the Public Utilities Code, is nothing less than an economic stimulus, job creation, educational advancement and public benefits bill. It seeks to provide equal access to the *sine qua non* for success in this century: access to and fluency in advanced communications technologies and the Internet. The Commission has the obligation to devise a studied plan of action, and the beneficial effects will be enormous. Moreover, with the assistance of those with most expertise in advanced technologies, the Commission will be able to craft a plan that satisfies jurisdictional issues, is competitively neutral, is cost-effective, and that begins to lessen increasing disparities between affluent and low-income, rural and urban, and white and ethnic communities. LIF and CCTPG reiterate the findings, set forth above, that the disparities are widening, not decreasing. SB 1563 requires a plan which goes beyond hoping that free markets will resolve the digital divide, which they will not. The Commission itself has noted with respect to its salutary actions and rulings on basic telephone service that:

It is the well-established policy of this Commission and this state that the value of the telephone network to all subscribers is enhanced as a greater portion of the state's population is connected to the public switched network and may be reached by anyone calling into California's local networks...In re Alternative Regulatory Frameworks for Local Exchange Carriers, D. 94-09-065, 56 CPUC 2d 117 at 139.

The same policy backed by a deployment plan should extend to ubiquitous advanced telecommunications networks and access to rural, low-income, ethnic language minority, disabled and other underserved communities.

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Respectfully submitted,

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ON BEHALF OF LATINO ISSUES FORUM
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