Mayor Bowser has selected OCTO to manage DC's participation in the federal Broadband Equity, Access, and Deployment ("BEAD") and State Digital Equity Capacity Grant ("DE Capacity") grant programs. To support its program obligations under 47 U.S.C. §§ 1702 & 1723, OCTO is seeking comment from the public on a variety of issues relevant to DC's continuing refinement of its broadband and digital equity programming.

OCTO is particularly interested in the thoughts and opinions of residents, community groups, incumbent broadband and digital service providers, and potential market entrants interested in providing broadband and digital services in DC. If you would like to share your thoughts with OCTO, please respond by email to TechTogether@dc.gov before midnight on October 1, 2023.

Providers of public comment are encouraged to consult the DC Freedom of Information Act, DC Official Code §§ 2-531 *et seq.*, and to mark any portions of their comments which they believe are exempt from public disclosure under DC Official Code § 2-534. If you have any questions concerning this request for public comment, please contact TechTogether@dc.gov or call 202-CONNECT (202-266-6328).

Topic Area One: Broadband Access and Affordability

Affordable, equitable access to broadband internet is a fundamental human right, and necessary to full participation in civic life. Despite DC's largely urban geography, and its political and economic prominence, many households here in the nation's capital still lack affordable, equitable access to broadband internet. Both the FCC's National Broadband Map (available at https://broadbandmap.fcc.gov/home) and NTIA's Indicators of Broadband Need Map (available at https://broadbandusa.ntia.doc.gov/resources/data-and-mapping) show significant regions of DC still suffering from inadequate access to affordable broadband infrastructure.

To aid in its planned use of federal grant funding and other relevant resources, OCTO seeks the public's responses to the following questions:

Question One: Does DC have sufficient fiber infrastructure in Wards 5, 7, and 8?

In responding to this question, consider whether greater fiber infrastructure would enable greater competition in fiber-to-the-premises offerings. Do DC residents have an adequate number of providers and service offerings to choose from in the home broadband market? Would a strong commitment of BEAD programming funds be helpful in attracting new market entrants to the DC broadband market? Additionally, consider whether greater availability of

competitively neutral fiber backhaul would support stronger fixed location wireless and mobile wireless offerings in DC. Could open-access middle mile infrastructure help encourage the development of various last mile broadband service offerings from DC's robust Certified Business Enterprise community?

Question Two: Does equity require some or all of any forthcoming broadband infrastructural investment in Wards 5, 7, and 8 to be constructed through underground conduit, rather than overhead utility pole attachment?

In responding to this question, consider whether threats from weather, vandalism, or targeted domestic terrorism materially affect the security of overhead broadband infrastructure.

Question Three: What is an appropriate out-of-pocket cost maximum for households eligible for the federal Affordable Connectivity Program to be expected to pay for basic home broadband per month? What is an appropriate out-of-pocket cost maximum for households in DC to be expected to pay for basic home broadband per month, without regard to that household's income or ability to pay?

In responding to this question, consider the significant costs necessary to build and maintain broadband networks, as well as the finite federal funding made available through the federal ACP. Additionally, consider whether DC's Community Internet Program's current affordability standards (available at: https://www.techtogetherdc.com/cip) offer appropriate standards for out-of-pocket cost maximums for basic plans.

Topic Area Two: Digital Literacy, Accessibility, and Inclusion

Even where broadband infrastructure is accessible and relatively affordable, persistent gaps in digital literacy can serve as significant barriers to truly equitable participation. Similarly, shortfalls in accessibility and inclusion generally can extend historical equity gaps into the digital lives of residents.

To aid in its planned use of federal grant funding and other relevant resources, OCTO seeks the public's responses to the following questions:

Question One: What formats for providing digital literacy training would be most effective in continuing to address digital literacy gaps here in DC?

In responding to this question, consider what digital literacy training formats have strong performance records for efficiently delivering measurable improvements in digital literacy and engagement. Additionally, consider what factors might best address hesitancy to participate in digital literacy training among those DC residents most in need of such training.

Question Two: How should DC focus its efforts in continuing to promote accessibility and inclusion in the delivery of government services?

In responding to this question, consider how residents currently access government services, and whether investment of State Digital Equity Capacity Grant funds, or an application for State Digital Equity Competitive Grant funds, would be helpful in improving the delivery of government services to bridge historical accessibility and inclusion gaps. Additionally, consider how DC's new one-stop Business Portal (available at: https://beta.business.dc.gov/), and the similarly structured and forthcoming Resident Portal, could best be used to support accessibility, inclusion, and general digital equity.

Topic Area Three: Data Privacy and Cybersecurity

Fears around data privacy and cybersecurity issues have traditionally contributed to hesitance in uptake of broadband and digital equity programming. Even as DC continues meaningful progress toward digital equity, bridging the digital divide to enable more full participation by all residents, it will be of paramount importance to give those residents the tools and training they need to stay safe online.

To aid in its planned use of federal grant funding and other relevant resources, OCTO seeks the public's responses to the following questions:

Question One: How best can DC help to ensure residents' data is used for their benefit?

In responding to this question, consider whether any safeguards should be utilized in any grant-funded programming to ensure residents are aware what data is being collected and how it is being used, to provide transparency into how such data is being used, to allow residents to restrict how such data is being shared or sold, or to provide residents with the right to have such data deleted. Should DC prescribe minimum data security standards or cybersecurity insurance requirements for prospective subcontractors or subgrantees?

Question Two: How best can DC provide residents with sufficient cybersecurity training to overcome hesitance and to keep them safe online?

In responding to this question, consider what cybersecurity training formats have strong performance records for efficiently delivering measurable improvements in cybersecurity risk management. Additionally, consider what if any investment DC should make in training DC businesses to implement better cybersecurity practices for the benefit of the DC residents they serve.

Topic Area Four: Equity and Artificial Intelligence

Though the current levels of public interest in artificial intelligence were not widely anticipated at the time Congress began developing the statutory bases for the broadband and digital equity grant programs which give rise to this request for comment, the precise contours of the intersection between the promise of artificial intelligence and our core commitment to equity have risen to preeminent concern. DC's broadband and digital equity programming would be incomplete without due consideration of the role of artificial intelligence going forward.

To aid in its planned use of federal grant funding and other relevant resources, OCTO seeks the public's responses to the following questions:

Question One: How best can DC ensure that the application of AI has a positive impact on DC's digital equity posture?

In responding to this question, consider whether the impacts of AI are likely to be more acute in more sensitive domains. Additionally, consider what safeguards might be put in place to mitigate any negative impact by AI on DC's digital equity posture, or how AI might be a positive tool in advancing digital equity within DC.

Question Two: How large a role, if any, should DC take in affirmatively regulating AI's impact on digital equity within DC?

In responding to this question, consider how regulation by DC might interact with regulation by the federal government and surrounding jurisdictions. Additionally, consider whether it would be best for DC directly to regulate the application of AI, or to indirectly regulate applications of AI by regulating outcomes using existing regulatory frameworks.

Topic Area Five: Device Availability and Affordability

Despite the continuous decrease in cost of internet-ready devices relative to inflation, many DC residents still lack adequate access to internet-ready devices necessary fully to share in the benefits of DC's digital economy. Internet-ready devices are essential tools in education, work, and health monitoring.

To aid in its planned use of federal grant funding and other relevant resources, OCTO seeks the public's responses to the following questions:

Question One: Where are the needs for affordable devices most acute?

In responding to this question, consider whether the need for further progress on the availability of devices is most prominent in relation to education, work, health monitoring, or any other essential activity. Additionally, consider whether particular communities, regions, or demographic areas within DC have especially acute needs in this area.

Question Two: What factors are most responsible for persistent unaffordability of devices?

In responding to this question, consider whether any specific market factors, or any other factors whatsoever, might be contributing to the unavailability or unaffordability of internet-ready devices.