AGENDA
Eau Claire County
Broadband Committee
Thursday, October 19, 2023
4:00 P.M. to 5:00 P.M.

Location: Eau Claire County Courthouse 721 Oxford Ave., Room #3312, Eau Claire, Wisconsin 54703

*Event link below can be used to connect to meeting and interact (by the chair) from computer or through the WebEx Meeting smartphone app.
Join WebEx Meeting: https://eauclairecounty.webex.com Meeting ID: 2595 636 4555
Password: xnT5eYnPF63
*Meeting audio can be listened to using this Audio conference dial in information.
Audio conference: 1-415-655-0001 Access Code: 25956364555##

A majority of the county board may be in attendance at this meeting, however, only members of the committee may take action on an agenda item.

For those wishing to make public comments, you must email Rod Eslinger at rod.eslinger@eauclairecounty.gov at least 60 minutes prior to the meeting to the start of the meeting.
*Please mute personal devices upon entry.

1. Call to order and confirmation of meeting notice.
2. Roll Call
3. Public Comment (limit to 3 minutes per person)
4. Review/Approval of September 19, 2023, Committee Meeting Minutes – **Discussion - Action**
5. Internet Service Provider (ISP) Updates – **Discussion**
6. Bloomer Broadband Town of Lincoln and Ludington PSC application – **Discussion-Action**
7. BEAD Local Planning Project Outline – **Discussion-Action**
8. BEAD Program Initial Proposal Volume 1 – **Discussion-Action**
9. Collective Impact Report – **Discussion - Action**
10. United Way Digital Equity & Inclusion Update – Amber Scharenbroch – **Discussion**
11. Next Steps and future meetings – **Discussion - Action**
    a. Future Meeting date: November 16, 2023
12. Adjourn

PLEASE NOTE: Upon reasonable notice, efforts will be made to accommodate the needs of individuals with disabilities through sign language, interpreters, remote access, or other auxiliary aids. Contact the clerk of the committee or Administration for assistance (715-839-5106). For additional information on ADA requests, contact the County ADA Coordinator at 839-7335, (FAX) 839-1669 or 839-4735, TTY: use Relay (711) or by writing to the ADA Coordinator, Human Resources, Eau Claire County Courthouse, 721 Oxford Avenue, Eau Claire, WI 54703.

MEETING MINUTES
Eau Claire County
Broadband Committee
Thursday, September 21, 2023
4:00 P.M.

Courthouse – Room #3312
721 Oxford Avenue – Eau Claire, WI

*Event link below can be used to connect to meeting and interact (by the chair) from computer or through the WebEx Meeting smartphone app.
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*Please mute personal devices upon entry.

Members Present: Todd Meyer, Don Mowry, Brian Berres, Luke Hanson, Tim Laubach, Tom Lange, Collin Pomplun, Rozanne Traczek, Monica Obrycki, Lynn Thompson.

Staff Present: Rodney J. Eslinger, Director of Planning and Development, Greg Dachel, Director of Information Systems, Dave Hayden, Broadband Consultant.

Others Present: Adam Raschka, Travis McFarlane, DeAnna Westphal

1. Call to order and confirmation of meeting notice.

   The meeting was called to order at 4:00 p.m. and the meeting notice was confirmed.

2. Roll Call – Members present are noted above. A quorum was present.

3. Public Comment (limit to 3 minutes per person) – None

4. Review/Approval of June 22, 2023, Committee Meeting Minutes – **Discussion/Action**

   The committee reviewed the meeting minutes of June 22, 2023.

   Rozanne Traczek motioned to approve the minutes as presented. Motion carried on a voice vote with all in favor of approving the June 22, 2023 committee minutes (10-0).

5. Internet Service Provider (ISP) Updates – **Discussion**

   Adam Raschka from Charter/Spectrum gave a RDOF update. He provided a coverage map that showed where their infrastructure has been installed and areas where home/businesses connections are available. Adam mentioned that most of the locations in the Town of Wilson will be covered by Spectrum. Mr. Raschka indicated that Spectrum is scheduled to complete the PSC grant installations in Washington and Pleasant Valley in 2024. Introductory rates for new customers will start at $49.99 per month and thereafter would increase to the national rate.

   DeAnna Westphal with Home Tech Innovation (Mosaic Communications) attended the meeting.

Travis McFarlane of Bloomer Broadband gave a brief update. He indicated that the Hallie/Seymour PSC grant project is progressing. Most of the installations are complete in Hallie and the crews continue to work on the main lines. Bloomer Broadband will provide fiber to 460 locations in Seymour. A 100 Mpbs symmetrical down and upload service will cost $49.95 and a 500 Mbps symmetrical down and upload service will cost $85.95. Both plans include a free Wi-Fi router. If sign up occurs during the grant period, Bloomer Broadband includes burying fiber to the house.

Dave Hayden indicated that he connected with Cory Heigl from Astrea and Astrea would be interested in a capital project that would serve the white space areas around Fall Creek. Mr. Hayden believed that Astrea provided gig service levels to Fall Creek and Augusta.

No other internet service providers (ISPs) were present.

6. Town of Seymour Release of 50% ARPA Match Funds – **Discussion-Action**

Clerk Eslinger provide a brief update on the Town of Seymour's request for County ARPA Match Fund.

Tom Lange motioned to approve the Town of Seymour release of 50% ARPA Funds ($162,500) as requested with Don Mowry seconding the motion; motion carried on a voice vote with all in favor of the motion (10-0).

7. Bloomer Broadband Town of Lincoln and Ludington expansions – **Discussion-Action**

Travis McFarlane of Bloomer Broadband indicated that his company is putting together a PSC application for the white space areas remaining in the Town of Ludington and Town of Lincoln. He noted there are 248 locations within the scope of the project, while the cost of the project is estimated at $2,594,570. His initial request for County ARPA funding is $455,328. The application deadline is November 7, 2023.

Motion was made by Don Mowry to support the Bloomer Broadband PSC application to cover the remaining white space areas in the Town of Ludington and Town of Lincoln to commit $400,000 of County ARPA money to the project, along with committing a dollar for dollar of County ARPA money as a match to each town commitments to the project. This also includes forwarding a letter of support from the Broadband Committee for the project. Motion carried on a voice vote with all members in favor of the motion (10-0).

8. Fairchild Fiber Grant Project – **Update**

Dave Hayden updated the committee on the Fairchild Fiber grant project.

9. BEAD Local Planning Project - **Update**

Clerk Eslinger and Mr. Hayden indicated they attended the BEAD workshop in Rice Lake. Both provided their perspectives of the workshop.

10. Collective Impact Report – **Discussion – Action**

Recommended moving to a future meeting.

11. Capital Projects Fund Broadband Infrastructure Grant Program – **Discussion - Action**

Recommend moving to a future meeting.

12. United Way Digital Equity & Inclusion Update – Amber Scharenbroch – **Discussion**

Amber Scharenbroch was unable to attend the meeting, but she did provide an email update of the United Way ongoing programing.

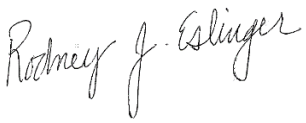
Don Mowry noted the AmeriCorps digital navigator programming.

13. Next Steps and future meetings
    a. October 19, 2023

14. Adjourn

Adjourn Action: Meeting adjourned by unanimous consent at 5:30 p.m.

Respectively submitted by,



Rodney J. Eslinger
Broadband Committee Clerk
Director of Planning and Development

Public Service Commission of Wisconsin

Rebecca Cameron Valcq, Chairperson
Tyler Huebner, Commissioner
Summer Strand, Commissioner

4822 Madison Yards Way
P.O. Box 7854
Madison, WI 53707-7854

September 29, 2023

To the Parties:

Re: Broadband and Digital Equity Planning 5-BP-2023

Broadband Equity, Access & Deployment (BEAD) Initial Proposal Volume 1

Comments Due:	Address Comments To:
Monday, October 30, 2023 at 1:30 PM	Public Service Commission P.O. Box 7854 Madison, WI 53707-7854
This docket uses the Electronic Records Filing system (ERF).	

The Broadband Equity, Access & Deployment (BEAD) Initial Proposal Volume 1 is being provided to the parties for comment. Comments must be received by 1:30 PM on Monday, October 30, 2023. The ERF system can be accessed through the Public Service Commission's website. Members of the public may file comments using the ERF system or by mail at the Public Service Commission, 4822 Madison Yards Way, P.O. Box 7854, Madison, WI 53707-7854.

Please direct questions about this docket or requests for additional accommodations for persons with a disability to the Commission's docket coordinator, Matthew Marcus at (608) 575-1509 or matthew.marcus@wisconsin.gov.

Sincerely,

Joe Fontaine
Administrator
Division of Digital Access, Consumer and Environmental Affairs

JF:MM:kle DL: 01966925

Attachments: Commission Memorandum
BEAD Initial Proposal, Volume 1

PUBLIC SERVICE COMMISSION OF WISCONSIN

Memorandum

September 29, 2023

FOR COMMISSION AGENDA

TO: The Commission

FROM: Joe Fontaine, Administrator
Tara Kiley, Deputy Administrator
Alyssa Kenney, State Broadband and Digital Equity Director
Rory Tikalsky, Broadband Expansion Manager
Matthew Marcus, Broadband Policy Lead
Josie Lathrop, Policy Analyst
Katherine Mumm, GIS and Broadband Data Analyst
Milena Bernardinello, Broadband Intelligence Product Owner and Program Manager
Division of Digital Access, Consumer, and Environmental Affairs

RE: Broadband and Digital Equity Planning 5-BP-2023

Broadband Equity, Access, and Deployment (BEAD)
Program Initial Proposal Volume 1

Suggested Minute:

The Commission (approved/approved with modifications/did not approve) the Wisconsin Broadband Equity, Access, and Deployment (BEAD) Program Initial Proposal Volume 1.

Background

On November 16, 2021, the U.S. Congress enacted the Infrastructure Investment and Jobs Act (Infrastructure Act), also known as the Bipartisan Infrastructure Law, which includes the Broadband Equity, Access, and Deployment (BEAD) Program. The Infrastructure Act states that "[a]ccess to affordable, reliable, high-speed broadband is essential to full participation in modern life in the United States," and that the digital divide "is a barrier to the economic competitiveness of the United States . . ." and "disproportionately affects communities of color,

lower-income areas, and rural areas."[1] To provide access to high-speed broadband, the Infrastructure Act created the BEAD Program. The National Telecommunications and Information Administration (NTIA), which is a part of the U.S. Department of Commerce, administers the BEAD program and has delegated primary administration and implementation to states and other eligible entities.[2] Under Wis. Stat. § 16.54, Governor Tony Evers authorized the Public Service Commission of Wisconsin (Commission) to administer BEAD Program funds.

The BEAD Program provides $42.45 billion nationwide with the principal focus of deployment of broadband service through a state-administered competitive funding program. States and other eligible entities are allocated BEAD funds based on a nationwide location-by-location map of broadband service (the National Broadband Map[3]) compiled by the Federal Communications Commission (FCC) as required by the Broadband Data Improvement Act.[4] NTIA calculated BEAD funds for each state based on the sum of the minimum state initial allocation of $100 million, the calculated high-cost allocation based on each state's share of unserved locations[5] in high cost areas, and the final allocation calculation of any remaining funds. The remaining funds allocation is based on the number of unserved locations (residential and business) as a proportion of the national total. As a result of this allocation calculation process, the NTIA has determined Wisconsin's BEAD funding allocation is $1,055,823,573.71.[6]

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[1] Sec. 60101. Infrastructure Investment and Jobs Act, Pub. L. No. 117-58 (2021), https://www.congress.gov/117/plaws/publ58/PLAW-117publ58.pdf.

[2] *See* Notice of Funding Opportunity, Broadband Equity, Access, and Deployment Program https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf

[3] *See* FCC National Broadband Map https://broadbandmap.fcc.gov/home

[4] *See* Broadband Data Improvement Act, Pub. L. No. 110-385 (2008), https://www.govinfo.gov/content/pkg/PLAW-110publ385/pdf/PLAW-110publ385.pdf.

[5] The term "unserved location" means a broadband-serviceable location that the Broadband DATA Maps show as (a) having no access to broadband service, or (b) lacking access to Reliable Broadband Service offered with – (i) a speed of not less than 25 Mbps for download; and (ii) a speed of not less than 3 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds.

[6] *See* National Telecommunications and Information Administration BEAD Allocation Press Release https://ntia.gov/press-release/2023/biden-harris-administration-announces-state-allocations-4245-billion-high-speed

On February 1, 2023, the Commission established the design of two planning subgrant programs to support Wisconsin's design and implementation of the BEAD program – the BEAD Local Planning Grant Program and the BEAD Workforce Planning Grant Program. (PSC REF#: 458495.) The Commission awarded grants to all eligible recipients who applied for BEAD Local Planning Grants under an allocation formula established in the program design, and made Workforce Planning Grant awards in its order of April 17, 2023. (PSC REF#: 464403.)

The NTIA required each state or other eligible entity to submit to the NTIA a Five-Year Action Plan informed by robust engagement and planning no later than 270 days after its receipt of Initial Planning Funds.[7] Wisconsin was allocated $5 million from its total BEAD allocation for the initial planning phase, which included research, capacity building, and outreach and engagement to inform the BEAD Five-Year Action Plan. Commission staff detailed a roadmap for establishing broadband goals and priorities, and a plan for a comprehensive needs assessment to inform the BEAD Five-Year Action Plan, informed by the findings from the BEAD Local Planning Grant Program and the BEAD Workforce Planning Grant Program. Commission staff submitted the BEAD Five-Year Action Plan to the NTIA on August 27, 2023.[8]

Wisconsin must submit to the NTIA the BEAD Initial Proposal (Initial Proposal) by December 27, 2023. According to NTIA guidance, the Initial Proposal should describe the process in which Wisconsin intends to use BEAD funding to ensure that every resident and business has access to a reliable, affordable, and high-speed broadband connection.[9] The Initial Proposal should primarily detail the process for determining which locations are eligible for

[7] *See* Notice of Funding Opportunity, Broadband Equity, Access, and Deployment Program https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf
[8] *See* Wisconsin Public Service Commission, BEAD Five-Year Action Plan https://psc.wi.gov/Documents/broadband/5YearActionPlan.pdf
[9] *See* NTIA BEAD Initial Proposal Guidance https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf

funding and the competitive process used to subaward implementation funding to subgrantees in Wisconsin. The Initial Proposal must be posted for public comment for a period of no less than 30 days prior to submission to the NTIA.

The Initial Proposal must be submitted in two parts, Volumes 1 and 2, which may be submitted together or separately. Wisconsin has opted to submit Volume 1 ahead of Volume 2. Submitting the volumes separately may expedite the review process for Volume 1 and allow Wisconsin to complete the required challenge process prior to the approval of Volume 2. The approval of Volume 2 would trigger the 365-day sub-awarding process and submitting the volumes separately may allow the challenge process to be complete prior to the sub-awarding timeline. This memorandum addresses Wisconsin's BEAD Initial Proposal Volume 1.

Discussion

The goal of the Initial Proposal Volume 1 is for Wisconsin to submit a proposal that will result in the determination of the locations and community anchor institutions (CAI) that are eligible for BEAD funding and conduct a challenge process to validate and finalize those determinations.[10] Of the 19 total requirements of the BEAD Initial Proposal,[11] Volume 1 addresses the following four:

- Identification of existing broadband funding in Wisconsin (Requirement 3)
- Identification of all unserved and underserved[12] locations in Wisconsin (Requirement 5)

[11] *See* Notice of Funding Opportunity, Broadband Equity, Access, and Deployment Program https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf

[11] *See* Notice of Funding Opportunity, Broadband Equity, Access, and Deployment Program https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf

[12] The term "underserved location" means a broadband-serviceable location that is (a) not an unserved location, and (b) that the Broadband DATA Maps show as lacking access to Reliable Broadband Service offered with—(i) a speed of not less than 100 Mbps for downloads; and (ii) a speed of not less than 20 Mbps for uploads; and (iii) latency less than or equal to 100 milliseconds.

- A proposed definition and identification of Community Anchor Institution (CAI) types (Requirement 6)
- Challenge Process (Requirement 7)

The NTIA has provided the BEAD Model Challenge Process as an example for how eligible entities such as the Commission can meet the requirement.[13] The Initial Proposal Volume 1 must indicate whether Wisconsin plans to adhere to the NTIA Model Challenge Process for purposes of compliance with requirement 7, and whether they will choose to adopt any optional modules provided in the model, make modifications to reflect data not in the National Broadband Map and not provided in the model. The BEAD Model Challenge Process also provides example responses (for Requirement 6) and templates for submission of data (for requirements 3 and 5).

In its draft of Initial Proposal Volume 1, Commission staff utilized the examples for requirement 6 to the extent applicable to Wisconsin and compiled a list of CAI locations based on its drafted definitions. (PSC REF#: 480753.) Commission staff used the NTIA provided model templates for submitting data under requirements 3 (PSC REF#: 480754) and 5. (PSC REF#: 480749.) (PSC REF#: 480750.) Commission staff's draft Initial Proposal Volume 1 would adopt the BEAD Model Challenge Process along with the following optional modules and modifications:

- Digital Subscriber Line (DSL) Pre-Challenge Modifications [Optional module 2 from BEAD Model Challenge Process]: Proposes to treat locations that the National Broadband Map shows to have available qualifying broadband service (i.e., a location

[13] *See* NTIA BEAD Challenge Process Policy Notice https://ntia.gov/sites/default/files/2023-09/bead_challenge_process_policy_notice.pdf

that is "served") delivered via DSL as "underserved". This modification would better reflect the locations eligible for BEAD funding because it would facilitate the phase-out of legacy copper facilities and ensure the delivery of "future-proof" broadband service.

- Licensed Fixed Wireless Pre-Challenge Modifications: Proposes to treat locations that the National Broadband Map shows to have available qualifying broadband service (i.e., a location that is "served") delivered via licensed fixed wireless as "underserved." This proposal was informed by multiple analyses of performance data that have indicated that, for many of the approximately 25,500 locations for which the only advertised 100/20 Mbps or greater broadband service is a licensed fixed wireless technology, actual performance falls materially below the 100/20Mbps threshold used to define locations as "served." First, recently, Commission staff recently obtained broadband speed test analysis for 25 percent of these locations, approximately 6,400 locations. Further analysis confirmed with medium to high confidence that 84 percent of these locations are experiencing speeds at materially below the 100/20 Mbps used to define locations as served.

  Furthermore, during the FCC's challenge processes, the FCC received 14,637 challenges to fixed wireless internet service in Wisconsin between September 2022 and May 2023. Of these accepted challenges the provider conceded 1,205 service offerings. The remaining 13,432 challenges were adjudicated by the FCC and the FCC upheld the challenge for 8,219 service offerings and overturned 5,119 challenges.[14] In total 65

[14] *See* Dataset of BDC service challenges for Wisconsin, total fixed challenges-resolved, downloaded August 31, 2023 https://broadbandmap.fcc.gov/data-download/challenge-data?version=dec2022

percent of the challenged fixed wireless service offerings were found to not offer service as initially reported to the FCC.

Finally, Wisconsin Internet Self Report (WISER) survey responses from 984 respondents at fixed wireless locations with advertised 100/20 Mbps found that 72 percent described their speeds as "poor" and 53 percent described their connections as "unreliable". Of this group of WISER respondents, 85 percent of those reporting they do not use internet at their location reported that it is because the internet is not available. This modification would better reflect the locations eligible for BEAD funding because it would minimize overstatement of wireless coverage and transmission capacity in light of the findings above. The challenge process would still allow providers to demonstrate existing service at specified locations do meet performance standards.

- Multi-dwelling Unit (MDU) Pre-Challenge Modifications: The National Broadband Map treats MDUs as a single location with a single service designation. This modification proposes to treat as underserved a subset of MDU locations that contain 50 or more housing units and are located within high-poverty, highly unconnected census tracts. This modification is intended to recognize that even if the MDU location is listed as served, not all of the housing units within the MDU location may be receiving qualifying broadband service, due to many potential factors that are outlined in the Initial Proposal Volume 1. In its draft Volume 1, Commission staff included the optional attachment of MDU locations that meet the criteria of this pre-challenge modification. (PSC REF#: 480751.)
- Affordability challenge type: Proposes to create an affordability challenge for instances where the only service plans available to a location imposes an unreasonable subscription

cost, defined as exceeding 250 percent of the average minimum broadband monthly subscription price for an urban census block, as analyzed by the Wisconsin Broadband Office and published in the Wisconsin BEAD Five- Year Action Plan.[15] Successful challenges to locations that meet this criteria and are found to have unreasonable broadband subscription costs, making service inaccessible in practice, would be designated as eligible underserved locations.

- Area and MDU Challenge: An area challenge reverses the burden of proof for availability, data caps, technology, and affordability challenge types if a provider receives numerous challenges for a particular category within a specific geographic area. Whereas the burden of proof is for other challenges is placed on the challenger, the burden of proof is placed on the provider receiving an area challenge or MDU challenge to demonstrate that they are indeed meeting the availability, data cap, technology requirement or affordability, respectively, for all (served) locations within the area or all units within an MDU.

Commission staff's draft Initial Proposal Volume 1 does not include the speed test pre-challenge optional module 3 provided in the NTIA BEAD Model Challenge. Due to the variability of numerous broadband network factors that affect the accuracy of speed tests – such as network traffic and demand, end-user technology (modems and routers), and lack of knowledge of user service adopted – Commission staff has found that speed tests are not an effective way to ensure correct identification of all eligible locations. Communities with more resources may be better able to collect and submit speed test challenges, while smaller and less

[15] Average minimum broadband monthly subscription price for an urban census block in Wisconsin is $60.88. Thus, if a location only has access to 100/20 Mbps or above broadband service that exceeds $152.20 per month, this challenge is applicable.

resourced communities may have less capacity. Staff suggest using the pre-challenge modules, as supported by robust data to ensure a challenge process that results in a more equitable list of eligible locations. Further, given that locations indicated as served by copper and fixed wireless technologies are proposed to be moved into the underserved category, it is expected many speed test-related challenges will be unnecessary. It is uncommon for fiber or cable technologies to consistently provide speed tests below 100/20 Mbps, staff anticipate that most speed tests would come from locations with technologies already eligible for BEAD funding.

The proposed pre-challenge modules included by Commission staff in Volume 1 – DSL, Licensed Fixed Wireless, and MDU– will re-classify these locations from served to underserved locations, rather than unserved. An unserved location is location without reliable broadband service with 25 Mbps download and 3 Mbps upload. An underserved location is a location without reliable broadband service with 100 Mbps download and 20 Mbps upload speed that is not an unserved location. BEAD requires Wisconsin to prioritize and reach all the unserved locations, while maintaining underserved locations as also eligible for program funding. The pre-challenge modules proposed do not affect the prioritized unserved locations but are intended to more accurately identify and make eligible all underserved locations in Wisconsin.

In addition to implementing eligibility definitions associated with the BEAD challenge process, NTIA requires eligible entities to remove any locations that have existing enforceable funding commitments to provide qualifying broadband service of 100/20 Mbps or greater before publishing the list of eligible unserved and underserved locations that would be considered for challenge. Commission staff, per the outlined requirements, have identified existing enforceable broadband funding commitments in Wisconsin. (PSC REF#: 480754.) Prior to the start of the challenge process, Commission staff would analyze these enforceable funding commitments

from the set of locations eligible for BEAD funding to remove locations with enforceable funding commitments, referred to as "deduplication of funding." (PSC REF#: 480752.)

Commission staff's draft Initial Proposal Volume 1 would represent a transparent, fair, expeditious and evidence-based challenge process that complies with the NTIA's requirements. By adopting the NTIA BEAD Model Challenge Process, Initial Proposal Volume 1 as drafted by staff would allow permissible challengers to include 501(c)(3) nonprofit organizations, units of local and Tribal governments, and broadband service providers with facilities currently in the Wisconsin or planned to be in the Wisconsin by June 30, 2024. According to the Initial Proposal Volume 1 as drafted, Commission staff would utilize the Commission's Electronic Record Filing (ERF) system to conduct the challenge process and fulfill the transparency requirements.

The NTIA's BEAD Challenge Process design requirements include four phases, as shown in the table below, as well as evidence requirements for challengers and fairness and transparency requirements for eligible entities.[16] Commission staff plans to begin the challenge process in January 2024, after submitting Initial Proposal Volume 2 by its due date of December 27, 2023. The final determination phase would be adjudicated by Commission staff to determine the list of eligible locations for the BEAD program to be submitted to NTIA for final review and determination. The following table outlines the timeline for the 90-day challenge period, with tentative dates for each challenge phase:

[16] *See* NTIA BEAD Challenge Process Policy Notice https://ntia.gov/sites/default/files/2023-09/bead_challenge_process_policy_notice.pdf

One week prior to start of challenge process *[estimated 1/16/2024]*	Phase 1 - Publish a list of eligible locations and overview of challenge process, timeline, and instructions for using ERF to submit challenges and rebuttals.
Day 0 *[estimated 1/23/2024]*	Publish BEAD eligibility map and location set by broadband serviceable location identification number
Day 0 – Day 30 *[estimated 1/23/2024 – 2/22/2024]*	Phase 2 - Challenge Phase
Day 31 – Day 60 *[estimated 2/23/2024 – 3/25/2024]*	Phase 3 – Rebuttal Phase
Day 60 up to Day 90 *[estimated 3/24/2024 – 4/26/2024]*	Phase 4 – Final Determination Phase completed by Commission staff
After April 30, 2024	NTIA reviews and may modify the final eligibility determinations made by Wisconsin following the challenge process.

Commission Alternatives

Alternative One: Approve the Wisconsin BEAD Initial Proposal Volume 1 as drafted by Commission staff, without modifications, for submission to NTIA and implementation.

Alternative Two: Approve the Wisconsin BEAD Initial Proposal Volume 1 with modifications pursuant to its discussion, for submission to NTIA and implementation.

Alternative Three: Do not approve the Wisconsin BEAD Initial Proposal Volume 1 and direct Commission staff to modify the proposal pursuant to its discussion and return the revised proposal to the Commission.

JF:TK:AK:RT:MM:KM:MB:kle DL: 01966900

Attachments: BEAD Initial Proposal Volume I (DL: 1966892)

INTERNET FOR ALL WISCONSIN

Initial Proposal Volume 1

Public Service Commission of WISCONSIN

Wisconsin Broadband Office

Table of Contents

Introduction

The Public Service Commission's (Commission) Wisconsin Broadband Office has drafted this Volume 1 to meet the following requirements of the Broadband Equity, Access, and Deployment (BEAD) Initial Proposal per the Notice of Funding Opportunity (NOFO)[1] and guidance provided by NTIA[2]:

- Requirement 3: Existing Broadband Funding
- Requirement 5: Unserved and Underserved Locations
- Requirement 6: Community Anchor Institutions
- Requirement 7: Challenge Process, including the adoption of the following modifications:
    - DSL Modifications
    - Fixed Wireless Modifications
    - Multi-Dwelling Unit (MDU) Modifications

See Appendix 1 for a comprehensive list of all the attachments required by NTIA that are cited throughout this Initial Proposal Volume 1.

Following a 30-day public comment period and review and consideration of the plan by the Commission, the Wisconsin Broadband Office will submit this Volume 1 to NTIA.

Volume 2 of the Initial Proposal, which will address the remaining NOFO requirements, will be released for public comment at a later date. The Wisconsin Broadband Office intends to run the challenge process following the submission of Volume 2, and receipt of NTIA approval of Volume 1.

[1] *See* Broadband Equity, Access, and Deployment Program, Notice of Funding Opportunity (BEAD NOFO) https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf

[2] *See* NTIA BEAD Initial Proposal Guidance https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf

Requirement 3: Existing Broadband Resources and Funding

Submitted on August 27, 2023, Wisconsin's BEAD Five-Year Action Plan details the state's existing broadband funding. Consistent with NTIA requirements, a description of existing broadband funding has been adapted and updated for the Volume 1 and includes:

- Sources of funding;
- A brief description of the broadband deployment and other broadband-related activities;
- The total funding of broadband activities;
- The funding amount expended; and
- The remaining funding amount available.

This list of existing broadband funding is provided in the attachment required by NTIA [WI_ExistingFunding.xlsx] (PSC REF#: 480754) and Appendix 1 (*requirement 1.1.1*). [3]

[3] *See* NTIA BEAD Initial Proposal Guidance, page 11 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf

Requirement 5: Unserved and Underserved Locations

Consistent with NTIA requirements, this Volume 1 includes as attachments, lists of all unserved locations [WI_Unserved.csv] (PSC REF#: 480749) (*requirement 1.2.1*) and underserved locations [WI_Underserved.csv] (PSC REF#: 480750) (*requirement 1.2.2*) in Wisconsin, using the Federal Communications Commission's (FCC) National Broadband Map (fabric 3) which includes availability data as of August 9, 2023 (*requirement 1.2.3*).[4] The Commission may elect to use a future version of the National Broadband Map to update the list of unserved and underserved locations.

The definitions of unserved and underserved locations are taken from the BEAD NOFO, published May 13, 2022. [5]

[4] *See* NTIA BEAD Initial Proposal Guidance, page 13 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf
[5] *See* BEAD NOFO, page 16-17 https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf

Requirement 6: Community Anchor Institutions

To identify eligible locations, based on the statutory definition of "community anchor institution" (47 USC 1702(a)(2)(e)), the Wisconsin Broadband Office applied the definition of "community anchor institution" as: an entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization (including any public housing agency or Department of Housing and Urban Development (HUD)-assisted housing organization), or community support organization that facilitates greater use of broadband service by vulnerable populations, including but not limited to low-income individuals, children, unemployed individuals, aged individuals, and incarcerated and formerly incarcerated individuals (*requirement 1.3.1*).[6]

The following definitions were used to identify the types of community anchor institutions:

- **Schools**: K-12 schools include all public and private schools identified by the Wisconsin Department of Instruction (DPI), and that have an NCES (National Center for Education Statistics) ID in the categories "public schools" or "private schools", including those located on Tribal lands.
- **Libraries**: Includes all libraries and their branches identified by DPI, which includes those participating in the FCC E-Rate program.
- **Health clinic, health center, hospital or other medical provider**: The list of health clinics, health centers, hospitals and other medical providers includes all institutions identified by the Wisconsin Department of Health Services (DHS), including those located on Tribal lands [https://data.dhsgis.wi.gov/search?collection=Dataset].
- **Public safety entity**: The list includes entities such as fire houses, emergency medical service stations, police stations, and public safety answering points (PSAP), based on records maintained by the Wisconsin Department of Military Affairs as well as using publicly available spatial data [https://livingatlas.arcgis.com/en/browse/?q=FIRE#d=2&q=FIRE]. The list of public safety answering points (PSAPs) includes all PSAPs in the FCC PSAP registry [https://www.fcc.gov/general/9-1-1-master-psap-registry].
- **Institution of higher education:** Institutions of higher education include all public and private institutions identified by DPI, including those located on Tribal land [https://data-wi-dpi.opendata.arcgis.com/datasets/colleges-and-universities-wisconsin-2021/explore].
- **Public housing organizations**: Public housing locations and locations receiving low-income housing tax credits were identified by downloading the dataset from the U.S. Department of Housing and Urban Development Open Data webpage [https://hudgis-hud.opendata.arcgis.com/search?collection=Dataset].
- **Community support organizations**: the Wisconsin Broadband Office included community support organizations that were not specifically listed in 47 USC

[6] *See* NTIA BEAD Initial Proposal Guidance, page 14 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf

1702(a)(2)(e), including those located on Tribal lands, and those that facilitate greater use of broadband service by vulnerable populations, including, but not limited to, low-income individuals, unemployed individuals, children, aged individuals, and incarcerated and formerly incarcerated individuals. To identify these locations, data sets from DHS and the Department of Corrections (DOC) were employed, along with collected data from the broadband office's digital equity outreach activities which identified many organizations serving these populations. [7]

Other organizations that serve the populations detailed under the community support organization community anchor institution type are being identified and will be included in the final community anchor institution list. In addition, the Wisconsin Broadband Office is using the challenge process to ensure that all relevant institutions meeting the community anchor institution criteria are included.

The Wisconsin Broadband Office undertook the following activities and engagements to assess the needs of the above types of community anchor institutions:

- **Collaboration and engagement with state government agencies**. The Wisconsin Broadband Office reached out to state agencies, requesting a formal letter that details their agencies existing works and needs related to broadband and digital equity.[8] The broadband office received responses from DPI, DHS and DOC. Ultimately, DPI shared all of the known school and library community anchor institutions in the state that lack 1 Gbps symmetrical service availability and highlighted needs by offering recommendations. DPI recommendations included connecting the community anchor institutions lacking 1 Gbps symmetrical and funding recommendations to ensure students have equitable access to broadband. DOC noted that many facilities need additional fiber infrastructure to connect all facility buildings and to enable needed wireless technology. DHS shared that improved access to broadband is needed across the state, particularly for Medicaid members and to enable telehealth.

A current list of eligible community anchor institution locations including all of the NTIA-required data points is included in the attached xlsx file [WI_CAI.xlsx] (PSC REF#: 480753) (*requirement 1.3.2*).[9]

[7] *See* DRAFT Wisconsin Digital Equity Plan, Section III: Collaboration and Stakeholder Engagement https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=479504

[8] https://apps.psc.wi.gov/pages/viewdoc.htm?docid=466751 Agencies contacted: Dept. of Agriculture, Trade, and Consumer Protection, Dept. of Children and Families, Dept. of Financial Institutions, Dept. of Health Services, Dept. of Military Affairs, Dept. of Natural Resources, Dept. of Administration, Dept. of Corrections, Dept. of Revenue. Dept. of Transportation, Dept. of Safety and Professional Services, Dept. of Veteran Affairs, Dept. of Workforce Development, Office of the Commissioner of Insurance, Dept. of Tourism, Wisconsin Economic Development Corporation, and Wisconsin Housing and Economic Development Corporation.

[9] *See* NTIA BEAD Initial Proposal Guidance, page 16 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf

For community anchor institutions, which are not included in the FCC's Fabric Dataset, the Wisconsin Broadband Office will assign an alternative unique location identifier for the purposes of the challenge process and subgrant implementation, as applicable.

Requirement 7: Challenge Process

Wisconsin will adopt the model challenge process provided by NTIA (requirement 1.4.1).[10] [11]

Modifications to reflect data not present in the National Broadband Map (*requirement 1.4.2)*[12]

DSL Modifications [Optional module 2 from BEAD Model Challenge Process]: The Wisconsin Broadband Office elects to include DSL Modifications in the Model Challenge Process and the Broadband Office will treat locations that the National Broadband Map shows to have available qualifying broadband service (i.e., a location that is "served") delivered via DSL as "underserved". When a location is shown to have qualifying broadband service reported for multiple providers and/or technologies, the service delivered via DSL will be reclassified, but the classification of location itself will remain served, unless the remaining qualifying broadband service(s) are successfully challenged, or reclassified through another modification.

This modification will better reflect the locations eligible for BEAD funding because it will facilitate the phase-out of legacy copper facilities and ensure the delivery of sustainable broadband service.

Licensed Fixed Wireless Modifications: Consistent with the NTIA's DSL Modifications and Speed Test Modules, the Wisconsin Broadband Office will treat locations that the National Broadband Map shows to have available qualifying broadband service (i.e., a location that is "served") delivered via fixed wireless (this includes licensed terrestrial or licensed-by-rule terrestrial) as "underserved." When the Licensed Fixed Wireless Modification is used to reclassify reported service at a location with multiple providers and/or technologies, the service(s) relevant affected by the modification will be reclassified and the classification of location itself will be reprocessed with the updated entry.

It is known that wireless service availability maps often overstate actual availability as it relates to the capacity and reach of the internet service. Fixed wireless broadband technologies underperform when faced with challenging topographies and barriers to line-of-sight (such as dense tree coverage) and that speed and reliability of broadband transmission degrades the farther a location is from a fixed wireless tower. Wisconsin has heavily wooded regions that experience such challenges with fixed wireless broadband solutions, as well as very remote and rural locations that are not within the reliable propagation range of fixed wireless towers. Further, due to limitations in some wireless transmission technology, wireless technologies lack transmission bandwidth necessary to provide advertised speeds to all locations within range of a tower. While a subset of locations with advertised fixed wireless service may access advertised speeds, it is often not possible for all locations to receive such advertised broadband speeds.

[10] *See* NTIA BEAD Model Challenge Process https://broadbandusa.ntia.doc.gov/funding-programs/broadband-equity-access-and-deployment-bead-program#initialproposal

[11] *See* NTIA BEAD Initial Proposal Guidance, page 18 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf

[12] *ibid*

Thus, models of fixed wireless coverage naturally overstate availability, which may disqualify locations in need of service from accessing for BEAD funding.

The Wisconsin Broadband Office analyzed the approximately 25,500 locations in Wisconsin for which the only advertised 100/20 Mbps or greater broadband service is a licensed fixed wireless technology (i.e., cable, fiber, and copper are unavailable). Broadband speed test analysis was obtained for 25 percent of these locations, approximately 6,400 locations. Further analysis confirmed with medium to high confidence that 84 percent of these locations despite being categorized as served, are experiencing speeds materially below 100/20 Mbps.[13]

The Wisconsin Broadband Office (WBO) also conducted the Wisconsin Internet Self Report Survey (WISER) and collected 984 responses to the WISER survey that overlapped with the locations that only have advertised 100/20 Mbps broadband service via a licensed fixed wireless technology (i.e., cable, fiber, and copper are unavailable). Of these 984 responses, only one recorded a speed test that met the threshold of greater than or equal to 100 Mbps download and 20 Mbps upload.

Further, 72 percent of WISER respondents with only fixed wireless service described their speeds as “poor” and 53 percent described their connections as “unreliable”. Of 346 respondents reporting they do not use the internet at their location, 85 percent report that it is because the internet is not available. This sample size and clear majority of responses demonstrate the improbability that locations advertising 100/20 Mbps are able to consistently deliver that speed to all locations.

During the FCC’s challenge processes, the FCC received 14,637 challenges to fixed wireless internet service in Wisconsin between September 2022 and May 2023. Of these accepted challenges the provider conceded 1,205 service offerings. The remaining 13,432 challenges were adjudicated by the FCC and the FCC upheld the challenge for 8,219 service offerings and overturned 5,119 challenges.[14] In total 65 percent of the challenged fixed wireless service offerings were found to not offer service as initially reported to the FCC. The FCC challenge process results provide further evidence that service availability and speeds are frequently overstated.

The Wisconsin Broadband Office acknowledges the variability in technology, spectrum, and deployment strategies of fixed wireless providers within the state allows some providers to achieve 100/20 Mbps service. However, this analysis suggests a majority of locations are not meeting their advertised broadband availability and performance claims. Consistent with this

[13] Speed test data was categorized in classes of low, medium, and high confidence levels mapped on a .10 square kilometer hexagon grid (Hex 10). High confidence was established as having more than 3 speed tests to compare, with more than one unique user. Medium confidence consisted of more than 3 speed tests and 1 unique user. Low confidence locations were removed from analysis as they were identified from nearest neighbor methodology and did not contain a unique user.

[14] Dataset of BDC service challenges for Wisconsin, total fixed challenges-resolved, downloaded August 31, 2023 https://broadbandmap.fcc.gov/data-download/challenge-data?version=dec2022

analysis, the Wisconsin Broadband Office finds it appropriate to shift the burden of proof for demonstrating served speeds via fixed wireless technology to the provider. In instances where the deployment methods of providers can be readily demonstrated to meet 100/20 Mbps speeds, a location may be challenged and returned back to served. A provider that demonstrates existing customers subscribe to 100/20 Mbps service at a location, provides data on network performance from mobile test unit at locations, or provides detailed information about network configuration and technology will fulfil its burden to demonstrate the network meets the speed, latency, reliability, and consistency goals of the BEAD program and does not require additional public investment.

This modification will better reflect the locations eligible for BEAD funding because it will minimize overstatement of wireless coverage and transmission capacity while allowing providers to demonstrate existing service. Further, reclassification of fixed wireless technologies to underserved will allow locations with only fixed wireless service to compete for access to fiber service consistent with the goals of the BEAD program to maximize fiber deployment as the technology best positioned "to meet the evolving connectivity needs of households and businesses."[15]

Multi-dwelling Unit (MDU) Modifications: Based on the criteria outlined in the BEAD NOFO,[16] the Wisconsin Broadband Office has compiled a list of multi-dwelling units (MDUs) that are unserved and underserved and therefore eligible for BEAD funding. The state of Wisconsin has elected to go beyond the National Broadband Map and publish a more comprehensive list of BEAD-eligible Broadband Serviceable Locations (BSLs), including MDUs that are eligible for the deployment of Wi-Fi infrastructure as an eligible use of funding in connection with last-mile broadband deployment projects as detailed in the BEAD NOFO.

The Wisconsin Broadband Office has identified 1,374 MDUs in high poverty and highly-unconnected census tracts, representing an estimated 133,221 households. These 1,374 locations shall be reclassified as underserved. A summary of the data is in the table below, and the list of locations are attached to this submission [WI_MDUs.xlsx] (PSC REF#: 480751) *(optional attachment 1.5.2).*[17]

[15] Public Law 117-58 135 Stat. 429, Infrastructure Investment and Jobs Act § 60102(a)(1)(I)

[16] *See* Notice of Funding Opportunity, Broadband Equity, Access, and Deployment Program, page 33 "4. Installing internet and Wi-Fi infrastructure or providing reduced-cost broadband within a multi-family residential building, with priority given to a residential building that has **substantial share of unserved households** or is **in a location in which the percentage of individuals with a household income that is at or below 150 percent of the poverty line applicable to a family of the size involved is higher than the national percentage of such individuals**" (emphasis added) https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf

[17] *See* NTIA BEAD Initial Proposal Guidance, page 27 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf

	FCC National Broadband Map Fabric			Actual BEAD Criteria
	Unserved	Underserved	Served	Unserved
Buildings with 50+ units	32	207	1,135	1,374

As the table suggests, the FCC National Broadband Map provides a starting point for Wisconsin's list of BEAD-eligible locations including MDUs. Since the National Broadband Map identifies multi-family housing developments as one BSL, it does not represent broadband availability of the individual units or households. Without accurate unit-by-unit data, the National Broadband Map significantly undercounts the number of unserved and underserved MDUs and households living in multi-family housing. For example, if an apartment building contains 100 households (i.e. units), the National Broadband Map only identifies this building as a single BSL. There are several scenarios where availability of broadband service at an MDU BSL does not equate to the same availability of broadband to all units within that location. This results in an overstatement of the availability of broadband service at multi-family housing locations and thus risks undercounts of the true total of Wisconsin residents who are unserved or underserved. Examples of these scenarios are summarized below:

- Internet Service Provider (ISP) offers a much more substantial service to the building manager's office or commercial space (Fiber) than their inside wiring is capable of delivering to the residential units (DSL).
- ISP has fiber-to-the-curb or building but has no inside wiring infrastructure to the unit.
- ISP is able to deliver fiber to the building within 10 days, but only offers business-class internet services and does not actually provide residential service.
- Technology at the MDU is not capable of delivering 25/3 or 100/20 across all households simultaneously.
- Inside wiring infrastructure is in a state of disrepair and cannot support speeds of 100/20 Mbps. Many public housing and affordable housing MDUs are 30 to 40-plus years old and wiring has not been adequately maintained.

- ISP's equipment is located in a Main Distribution Frame (MDF), Intermediate Distribution Frame (IDF), cabinet, pedestal, node or potentially the central office, and is not capable of delivering 25/3 or 100/20 across all households simultaneously without overbuilding the entire MDU.[18]

- Non-cellular, licensed Fixed Wireless Access (FWA) providers without existing equipment/service in the MDU are not able to meet the 10-day installation window. The individual household of an MDU does not have the ability to authorize a Licensed FWA provider to access rooftops, telco rooms, and run new wiring all the way to their unit. This would require an agreement with the building owner and possibly a permit.

The additional MDUs on the list of underserved locations are based on the *property's location in census tracts with very high levels of poverty and/or very low levels of connectivity*, as called out in the BEAD NOFO. The source data used to identify the MDUs on the list come from the American Community Survey, coupled with data from HUD and commercially-available real estate databases.[19] These additional data sources give ample evidence that the universe of underserved locations as defined in the NOFO span beyond simply those defined as unserved and underserved in the FCC's National Broadband Map.

By expanding the universe of underserved locations to include all MDUs in census tracts with both high poverty rates and high numbers of unconnected households, Wisconsin can prioritize MDUs that have a high probability of meeting the BEAD prioritization requirement of having "a substantial share of unserved households," To determine whether there is a "substantial share of underserved households" in an MDU, unit level availability data is needed. As the current National Broadband Map does not classify households at the unit level, their true classification is unknown; therefore, the Wisconsin Broadband Office considers these specified MDUs as underserved until they are successfully challenged as served.

Identifying enforceable commitments

The Wisconsin Broadband Office will adopt the BEAD Eligible Entity Planning Toolkit to identify existing federal enforceable commitments (*requirement 1.4.3*).[20] The Wisconsin Broadband Office will supplement the BEAD Eligible Entity Planning Toolkit with State data to identify state enforceable commitments and other local and federal enforceable funding commitments.

[18] MDF and IDF are industry standard designations for racks of networking equipment, or switches, that help distribute the network throughout the property. If outdated they will not handle a high enough capacity to distribute the required bandwidth to each unit regardless of how large the backhaul signal coming into the property.

[19] This data was analyzed and compiled by research and engineering teams at EducationSuperHighway (ESH) and provided to the state at no cost. ESH sourced third-party real estate data and combined them with HUD location datasets.

[20] *See* NTIA BEAD Initial Proposal Guidance, page 20 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf

To enumerate locations subject to enforceable commitments, the Wisconsin Broadband Office will use the BEAD Eligible Entity Planning Toolkit and consult the following data sets (*requirement 1.4.4)*[21]*:*

- The Broadband Funding Map published by the FCC pursuant to IIJA § 60105.
- The Wisconsin Broadband Office's Broadband Grant Footprint map, data from grant awardees and grant management database that includes awarded and completed projects for broadband expansion grant projects administered by the state, including those that were funded federally through State and Local Fiscal Recovery Funds, and locations awarded grants using state funds.
- Data procured or collected by the Wisconsin Broadband Office to identify additional locations with enforceable funding commitments.

The Wisconsin Broadband Office will make a best effort to create a list of BSLs subject to enforceable commitments based on state-administered/grants. If necessary, the broadband office will translate polygons to a list of Fabric locations.

The Wisconsin Broadband Office will review its repository of existing state and local broadband grant programs to validate the upload and download speeds of existing binding agreements to deploy broadband infrastructure.

Deduplication of Funding

A list of federal, state, and local programs that will be analyzed to remove enforceable commitments from the set of locations eligible for BEAD funding is provided in the attached file per NTIA requirements [WI_DeduplicationofFunding.xlsx] (*requirement 1.4.5*).[22]

Challenge Process Design

Based on the NTIA BEAD Challenge Process Policy Notice, as well as the broadband office understanding of the goals of the BEAD program, the proposal represents a transparent, fair, expeditious and evidence-based challenge process (*requirement 1.4.6).*[23]

Permissible Challenges

The Wisconsin Broadband Office will only allow challenges on the following grounds:

- The identification of eligible community anchor institutions, as defined by the Eligible Entity,
- Community anchor institution BEAD eligibility determinations,
- BEAD eligibility determinations for existing BSLs,

[21] *See* NTIA BEAD Initial Proposal Guidance, page 21 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf
[22] *See* NTIA BEAD Initial Proposal Guidance, page 22 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf
[23] *See* NTIA BEAD Initial Proposal Guidance, page 23 https://broadbandusa.ntia.doc.gov/sites/default/files/2023-07/BEAD_Initial_Proposal_Guidance_Volumes_I_II.pdf

- Enforceable commitments, or
- Planned service.

Permissible Challengers

Per the outlined NTIA BEAD Model Challenge Process that has been adopted for this Volume 1, the Wisconsin Broadband Office will only allow challenges from 501(c)(3) nonprofit organizations, units of local and Tribal governments, and broadband service providers with facilities currently in the State of Wisconsin or facilities planned by June 30, 2024.

Challenge Process Overview

The challenge process conducted by the Wisconsin Broadband Office will include four phases, spanning 90 calendar days:

- Publication of Eligible Locations: Prior to beginning the Challenge Phase, the broadband office will publish the set of locations eligible for BEAD funding, which consists of the locations resulting from the activities outlined in Wisconsin's Initial Proposal Volume 1 submission (e.g., administering the deduplication of funding process). The office will also publish locations considered served, as they may be challenged. [*estimated 1/16/2024]*
- Challenge Phase: During the Challenge Phase, the challenger will submit the challenge through the Commission's ERF system. ERF will serve as a challenge portal for the challenge process and the Commission will use docket 5-BCH-2024 for the challenge process. This challenge will be visible to the public and to the service provider whose service availability and performance is being contested. Providers will be required to subscribe to the docket, which will enable providers to be notified of challenges via email. The Commission will also ensure providers receiving challenges receive information about timing for the provider's response. After this stage, the location will enter the "challenged" state.
    - Minimum Level of Evidence Sufficient to Establish a Challenge: The challenge will be verified to ensure that the address provided can be found in the Fabric, is a BSL, and as applicable meets the definition of reliable broadband service. For availability challenges, the broadband office will manually verify that the evidence submitted falls within the categories stated in the NTIA BEAD Challenge Process Policy Notice as modified by this document and that the evidence is unredacted and dated.
    - Timeline: Challengers will have 30 calendar days to submit a challenge from the time the initial list of unserved and underserved locations, community anchor institutions, and existing enforceable commitments are posted. *[estimated 1/23/2024 – 2/22/2024]*
- Rebuttal Phase: Only the challenged service provider may rebut the reclassification of a location or area with evidence, causing the location or locations to enter the "disputed" state. If a challenge that meets the minimum level of evidence is not rebutted, the challenge is sustained. A provider may also agree with the challenge and thus transition

the location to the "sustained" state. Providers must regularly check the challenge portal notification method (e.g., email) for notifications of submitted challenges.

  - Timeline: Providers will have 30 calendar days from notification of a challenge to provide rebuttal information to the broadband office. *[estimated 2/23/2024 - 3/25/2024]*

- Final Determination Phase: During the Final Determination phase, the broadband office will make the final determination of the classification of the location, either declaring the challenge "sustained" or "rejected."
  - Timeline: Following intake of challenge rebuttals, the broadband office will make a final challenge determination within 30 calendar days of the challenge rebuttal. Reviews will occur on a rolling basis, as challenges and rebuttals are received. *[estimated 3/24/2024 - 4/26/2024]*

Evidence & Review Approach

To ensure that each challenge is reviewed and adjudicated based on fairness for all participants and relevant stakeholders, the broadband office will review all applicable challenge and rebuttal information objectively, before deciding to sustain or reject a challenge. The broadband office will document the standards of review to be applied in a Standard Operating Procedure and will require reviewers to document their justification for each determination. The Wisconsin Broadband Office plans to ensure reviewers have sufficient training to apply the standards of review uniformly to all challenges submitted. The office will also require that all reviewers submit affidavits to ensure that there is no conflict of interest in making challenge determinations.[24]

[24] If necessary, the broadband office maintains the ability to work with challengers and rebutters to align submissions with the appropriate challenge type and the requisite data specifications.

Code	Challenge Type	Description	Specific Examples	Permissible rebuttals
A	Availability	The broadband service identified is not offered at the location. For MDUs, this includes service not being available at an individual unit.	- Screenshot of provider webpage. - A service request was refused within the last 180 days (e.g., an email or letter from provider). - Lack of suitable infrastructure (e.g., no fiber on pole). - A letter or email dated within the last 365 days that a provider failed to schedule a service installation or offer an installation date within 10 business days of a request.[25] - A letter or email dated within the last 365 days indicating that a provider requested more than the standard installation fee to connect this location or that a Provider quoted an amount in excess of the provider's standard installation charge in order to connect service at the location.	- Provider shows that the location subscribes or has subscribed within the last 12 months, e.g., with a copy of a customer bill. - If the evidence was a screenshot and believed to be in error, a screenshot that shows service availability. - The provider submits evidence that service is now available as a standard installation, e.g., via a copy of an offer sent to the location.

[25] A standard broadband installation is defined in the Broadband DATA Act (47 U.S.C. § 641(14)) as "[t]he initiation by a provider of fixed broadband internet access service [within 10 business days of a request] in an area in which the provider has not previously offered that service, with no charges or delays attributable to the extension of the network of the provider."

U	Affordability	The non-promotional broadband service price available exceeds 250% of the average minimum broadband monthly subscription price for an urban census block ($60.88) – i.e. the location only has access to 100/20 Mbps or above broadband service that exceeds $152.20 per month.	-Screenshot of provider webpage or marketing materials. -Service description provided to consumer. -Details from a customer bill relating to the cost of service.	- If the evidence was a screenshot and believed to be in error, a screenshot that shows service availability. - The provider submits evidence that service 100/20 Mbps or above is provided for less than $152.20 per month, e.g., with a copy of a customer bill.
F	Fixed Wireless Speed	The actual speed of broadband service at each location is consistently 100/20 Mbps or greater.	- Demonstrates availability to the specific location with results from a mobile test unit.[26] - Provides evidence of an existing subscription for 100/20 Mbps or faster service at the location. - Demonstrates the capacity of the service to consistently provide 100/20 Mbps by providing information on the wireless network configuration and technology that serves the location, which may include	- Screenshot of provider webpage or correspondence from provider indicating qualifying broadband service of 100/20 Mbps or greater is not available. - Screenshot or correspondence showing that qualifying broadband service of 100/20 Mbps or greater exceeds the reasonable cost of $152.20 per month.

[26] A mobile test unit is a testing apparatus that can be easily moved and simulates the equipment and installation (antenna, antenna mast, subscriber equipment, etc.) that would be used in a typical deployment of fixed wireless access service by the provider.

			information on the backhaul, bandwidth, number of connections per tower, specifications of transmission equipment, the capacity and wavelength of licensed spectrum, and connection capacity of towers.	
M	Multiple Dwelling Unit (MDU) Comprehensive Availability	All and each housing units at the location have access to a broadband service that is consistently providing 100/20 Mbps or greater.	- List of broadband subscribers receiving at least 100/20 Mbps service that includes all housing units at the location. -Billing statements for minimum 100/20 Mbps service for all housing units at the location. - Evidence of correspondence offering qualifying broadband subscription to all housing units at the location.	- Screenshot of provider webpage or correspondence from provider indicating qualifying broadband service of 100/20 Mbps or greater is not available.
D	Data cap	The only service plans marketed to consumers impose an unreasonable capacity allowance ("data cap") on the consumer.[27]	- Screenshot of provider webpage. - Service description provided to consumer.	- Provider has terms of service showing that it does not impose an unreasonable data cap or offers another plan at the location without an unreasonable cap.
T	Technology	The technology indicated for this	- Manufacturer and model number of residential gateway	- Provider has countervailing evidence from

[27]. An unreasonable capacity allowance is defined as a data cap that falls below the monthly capacity allowance of 600 GB listed in the FCC 2023 Urban Rate Survey (FCC Public Notice DA 22-1338, December 16, 2022). Alternative plans without unreasonable data caps cannot be business-oriented plans not commonly sold to residential locations.

		location is incorrect.	(CPE) that demonstrates the service is delivered via a specific technology.	their network management system showing an appropriate residential gateway that matches the provided service.
B	Business service only	The location is residential, but the service offered is marketed or available only to businesses.	- Screenshot of provider webpage.	- Provider documentation that the service listed in the BDC is available at the location and is marketed to consumers.
E	Enforceable Commitment	The challenger has knowledge that broadband will be deployed at this location by the date established in the deployment obligation.	- Enforceable commitment by service provider (e.g., authorization letter). In the case of Tribal Lands, the challenger must submit the requisite legally binding agreement between the relevant Tribal Government and the service provider for the location(s) at issue (see Section 6.2 above).	- Documentation that the provider has defaulted on the commitment or is otherwise unable to meet the commitment (e.g., is no longer a going concern).
P	Planned service	The challenger has knowledge that broadband will be deployed and available to customers at this location by June 30, 2024, without an enforceable commitment or a provider is building out broadband offering	- Construction contracts or similar evidence of on-going deployment, along with evidence that all necessary permits have been applied for or obtained. - Contracts or a similar binding agreement between the Eligible Entity and the provider	- Documentation showing that the provider is no longer able to meet the commitment (e.g., is no longer a going concern) or that the planned deployment does not meet the required technology or

		performance sufficient to meet the requirements of an enforceable commitment.	committing that planned service will meet the BEAD definition and requirements of reliable and qualifying broadband even if not required by its funding source (*i.e.*, a separate federal grant program), including the expected date deployment will be completed and service will available to customers, which must be on or before June 30, 2024.	performance requirements.
N	Not part of enforceable commitment.	This location is in an area that is subject to an enforceable commitment to build less than 100% of locations and the location is not covered by that commitment. (See BEAD NOFO at 36, n. 52.) This location is not part of an enforceable funding commitment due to change in scope of work for existing grant agreement or similar contract.	- Declaration by service provider subject to the enforceable commitment.	
C	Location is a CAI	The location should be	- Evidence that the location falls within the	- Evidence that the location does not fall within the

		classified as a CAI.	definitions of CAIs set by the Eligible Entity.[28]	definitions of CAIs set by the Eligible Entity or is no longer in operation.
R	Location is not a CAI	The location is currently labeled as a CAI but is a residence, a non-CAI business, or is no longer in operation.	- Evidence that the location does not fall within the definitions of CAIs set by the Eligible Entity or is no longer in operation.	- Evidence that the location falls within the definitions of CAIs set by the Eligible Entity or is still operational.

Area Challenges and MDU Challenges

The Wisconsin Broadband Office will administer area and MDU challenges for challenge types A, D, U, and T. An area challenge reverses the burden of proof for availability, data caps, affordability, and technology if a defined number of challenges for a particular category, across all challengers, have been submitted for a provider. Thus, the provider receiving an area challenge or MDU must demonstrate that they are indeed meeting the availability, data cap and technology requirement, respectively, for all served locations within the area or all units within an MDU. The provider can use any of the permissible rebuttals listed above.

An area challenge is triggered if six or more broadband serviceable locations using a particular technology and a single provider within a census block group are challenged.

An MDU challenge requires challenges by at least three units or 10% of the unit count listed in the Fabric within the same broadband serviceable location, whichever is larger.

Each type of challenge and each technology and provider is considered separately, i.e., an availability challenge (A) does not count towards reaching the area threshold for a technology (T) challenge. If a provider offers multiple technologies, such as DSL and fiber, each is treated separately since they are likely to have different availability, terms and performance.

Area challenges for availability need to be rebutted with evidence that service is available for all BSLs within the census block group, e.g., by network diagrams that show fiber or Hybrid Fiber-Coax infrastructure or customer subscribers. For fixed wireless service, the challenge system will offer representative random, sample of the area in contention, but no fewer than ten, where the provider has to demonstrate service availability and speed (e.g., with a mobile test unit).[29]

[28] For example, eligibility for FCC e-Rate or Rural Health Care program funding or registration with an appropriate regulatory agency may constitute such evidence, but the Eligible Entity may rely on other reliable evidence that is verifiable by a third party.

[29] A mobile test unit is a testing apparatus that can be easily moved, which simulates the equipment and installation (antenna, antenna mast, subscriber equipment, etc.) that would be used in a typical deployment of fixed wireless access service by the provider.

Transparency Plan

To ensure that the challenge process is fully transparent, the Wisconsin Broadband Office will, upon approval from NTIA, publicly post an overview of the challenge process phases, challenge timelines, and instructions on how to submit and rebut a challenge on its website . This documentation will be posted publicly for at least a week prior to opening the challenge submission window. The office also plans to actively inform all units of local government and Tribes of its challenge process and set up regular touchpoints to address any comments, questions, or concerns from local and Tribal governments, nonprofit organizations, and internet service providers. Relevant stakeholders can sign up on the Wisconsin Broadband Office website for challenge process updates via the newsletter and should subscribe to the docket 5-BCH-2024 through the Commission's ERF system to receive real-time challenge updates. They can engage with the Wisconsin Broadband Office by a designated email address (PSCStateBroadbandOffice@wisconsin.gov). Providers will be required to subscribe to the Commission challenge docket, 5-BCH-2024 and will be notified of challenges through the Commission's ERF system via email.

Beyond actively engaging relevant stakeholders, the Wisconsin Broadband Office will also post all submitted challenges and rebuttals before final challenge determinations are made, including:

- the broadband service provider, nonprofit, or unit of local or Tribal government that submitted the challenge,
- the census block group containing the challenged broadband serviceable location,
- the provider being challenged,
- the type of challenge (e.g., availability or technology), and
- a summary of the challenge, including whether a provider submitted a rebuttal.

The office will make every effort to not publicly post any personally identifiable information (PII) or proprietary information, including subscriber names, street addresses and customer IP addresses. To ensure all PII is protected, the broadband office will expeditiously review the basis and summary of all challenges and rebuttals to ensure PII is removed. Additionally, guidance will be provided to all challengers that all information they submit will be posted publicly.

The Wisconsin Broadband Office will treat information submitted by an existing broadband service provider designated as proprietary and confidential consistent with applicable federal law. If any of these responses do contain information or data that the submitter deems to be confidential commercial information that should be exempt from disclosure under state open records laws or is protected under applicable state privacy laws, that information should be identified as privileged or confidential and provider will file both a confidential and redacted copy of the information. Otherwise, the responses will be made publicly available.

Appendix 1: BEAD Initial Proposal Volume 1 Attachments

Requirement 3: Existing Broadband Resources and Funding Attachments

> **1.1.1 Attachment**: As a required attachment, submit the file identifying sources of funding, a brief description of the broadband deployment and other broadband-related activities, the total funding, the funding amount expended, and the remaining funding amount available. Eligible Entities may copy directly from their Five-Year Action Plans.

Per NTIA requirements the list of existing funding was submitted as an attachment [WI_ExistingFunding.xlsx] and can be found under the same file name on the Commission's ERF system under docket 5-BCH-2024. (PSC REF#: 480754.)

Requirement 5: Unserved and Underserved Location Attachments

> **1.2.1 Attachment**: As a required attachment, submit one CSV file with the location IDs of each unserved location including unserved locations in applicable Tribal Lands.

> **1.2.2 Attachment**: As a required attachment, submit one CSV file with the location IDs of each underserved location including underserved locations in applicable Tribal Lands.

Per NTIA requirements the single-column CSV files for all unserved locations [WI_Unserved.csv] and underserved locations [WI_Underserved.csv] were submitted as attachments and can be found under the same file names on the Commission's ERF system under docket 5-BCH-2024. (PSC REF#: 480749.) (PSC REF#: 480750.)

Requirement 6: Community Anchor Institution Attachments

> **1.3.2 Attachment:** As a required attachment, submit the CSV file that lists eligible community anchor institutions that require qualifying broadband service and do not currently have access to such service, to the best of the Eligible Entity's knowledge.

Per NTIA requirements the list of eligible community anchor institutions were submitted as an attachment [WI_CAI.xlsx] and can be found under the same file name on the Commission's ERF system under docket 5-BCH-2024. (PSC REF#: 480753.)

Requirement 7: Challenge Process Attachments

1.4.5 Attachment: As a required attachment, submit the list of the federal, state/territorial, and local programs that will be analyzed to remove enforceable commitments from the set of locations eligible for BEAD funding.

Per NTIA requirements the list of enforceable funding commitments that will be used to deduplicate funding was submitted as an attachment [WI_DeduplicationofFunding.xlsx] and can be found under the same file name on the Commission's ERF system under docket 5-BCH-2024. (PSC REF#: 480752.)

Optional Attachments

1.5.2 Optional Attachment: As an optional attachment, submit supplemental materials to the Volume I submission and provide references to the relevant requirements. Note that only content submitted via text boxes, certifications, and file uploads in sections aligned to Initial Proposal requirements in the NTIA Grants Portal will be reviewed, and supplemental materials submitted here are for reference only.

Per NTIA Guidance, in support of the Wisconsin Broadband Office's proposed Multi-dwelling Unit (MDU) Pre-Challenge Modification, a list of MDUs to be reclassified as 'underserved' has been submitted as supplemental material [WI_MDUs.xlsx] and can be found under the same file name on the Commission's ERF system under docket 5-BCH-2024. (PSC REF#: 480751.)

CDE
THE CENTER FOR DIGITAL EQUITY

COLLECTIVE IMPACT REPORT

July 2022 - June 2023

THE CENTER FOR DIGITAL EQUITY is a collaboration of public, private, and resident partners housed at Queens University of Charlotte

QUEENS UNIVERSITY of CHARLOTTE

CENTER FOR DIGITAL EQUITY COLLECTIVE IMPACT REPORT

CONTENT

CELEBRATION
Happy recipients at an after-school program with the Learning Help Centers of Charlotte.

MISSION STATEMENT The Center for Digital Equity's (CDE) mission is to make Mecklenburg County the most digitally equitable community in America.

VISION The Center for Digital Equity is the backbone organization for a collective impact strategy bringing together residents, and public and private sector partners to co-create solutions allowing every resident the opportunity to thrive in our modern culture.

HISTORY The Center for Digital Equity is an evolution of two key community initiatives, Digital Charlotte and the Charlotte Digital Inclusion Alliance, and is housed at Queens University of Charlotte.

Executive Summary

As we all know, the pandemic highlighted the need for communities worldwide to strive for a more digitally equitable society. But unfortunately, the lack of internet access and adoption, a working device, and basic computer literacy skills place our residents at a disadvantage and prevent them from thriving in our modern culture.

WHERE WE STARTED

The Center for Digital Equity (CDE), is the result of merging the existing digital equity work at Queens University of Charlotte, known as Digital Charlotte with a border community effort known as the Charlotte Digital Inclusion Alliance.

Since 2015, a coalition of interested parties began convening monthly to advance digital equity work. In 2017 this coalition produced North Carolina's first community-based digital equity playbook. The playbook highlighted existing opportunities and brought to light the opportunities digital equity provides. Supported by an endowment from the Knight Foundation, the CDE has been actively working to advance digital equity in our community for over six years.

Even with all that effort, we know there is more work to be done and in a more coordinated fashion. Housed at Queens, the CDE is a backbone organization for a collective impact strategy focused on making Mecklenburg County the most digitally equitable community in America. The CDE brings together residents, and public and private-sector partners to co-create solutions aimed at this goal.

The CDE is guided by a community council of residents and the aforementioned partners who are organized across five workstreams:

1. Policy, Advocacy, and Ecosystem Development
2. Data, Research, and Program Measurement
3. Device and Connectivity
4. Digital Literacy and Skilling
5. Digital Navigation and Technical Support

An advisory board of public and private-sector leaders helps ensure alignment across our community's anchor institutions.

WHERE WE ARE NOW

This year, the CDE was named the lead partner for the digital divide priority focus area for the Mayor's Racial Equity Initiative (MREI). Established to advance Charlotte to the forefront of American cities working to achieve racial equity, the MREI seeks to produce equitable access, opportunities, and outcomes for Charlotte's communities of color. Digital equity is a cornerstone of this work. The MREI has connected $20 million in private sector-funding to develop the CDE's delivery of digital inclusion resources to the community.

With historic federal investments in digital equity taking shape, there is no better time to reorganize, galvanize, and engage our community of partners. With this collective impact approach, the end goal is as important as how we get to it. Our growing team and Community Council are committed to engaging every facet of this work with an eye toward diversity, equity and inclusion.

Becoming the most digitally equitable community in America is within reach!

IMPACT REPORT
SECTION LEGEND
- Co-created Key Performance Indicators (KPI)
- Impact Stories

CDE
THE CENTER FOR DIGITAL EQUITY

COLLABORATION
U.S. Vice President Kamala Harris and N.C. Governor Roy Cooper, FCC Chairwoman Jessica Rosenworcel speak with CDE Team and community member about the Affordable Connectivity Program.

DEVICE AND CONNECTIVITY

PAVING THE PATH TO CONNECTIVITY

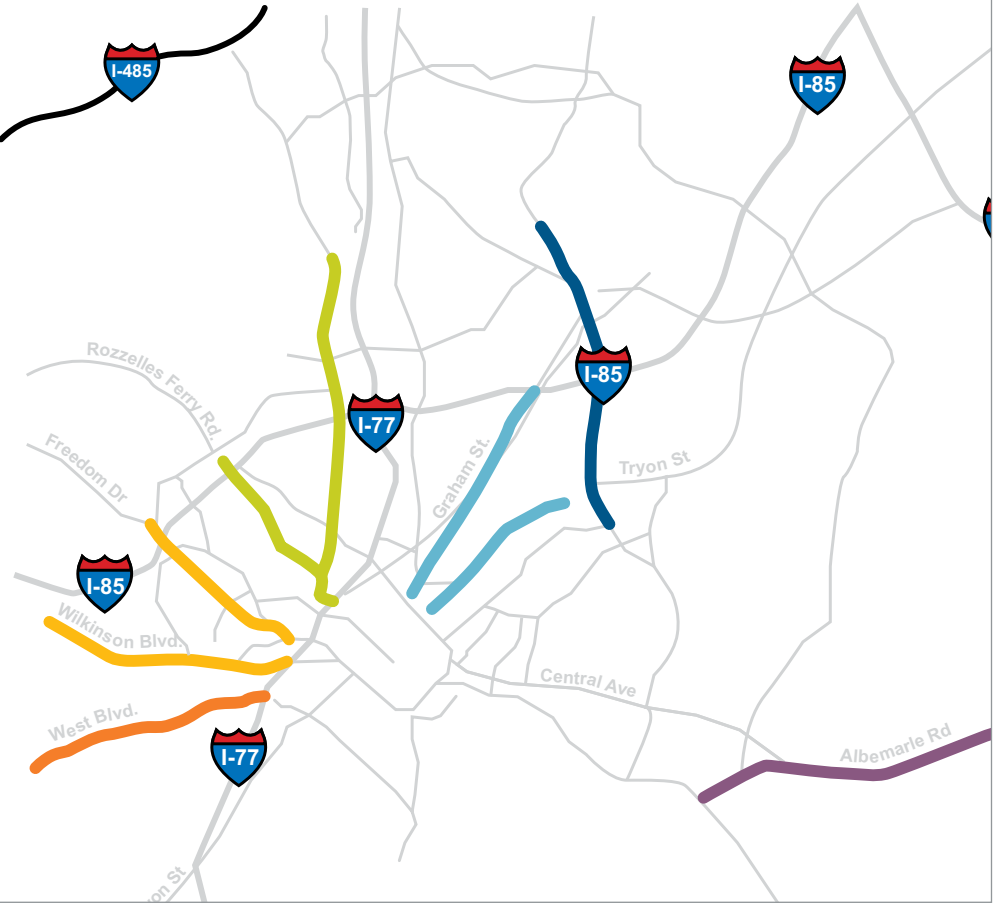
KPI: Supporting Internet adoption for at least 10,000 households

Internet Service Provider (ISP) adoption is the foundation of digital connectivity. Our distribution events helped generate a three percent increase in internet service adoption countywide. One of our major goals was to support internet adoption for 10,000 Mecklenburg County households. We exceeded this goal, raising awareness for the program among 13,000 residents.

Through the Your Home Your Internet grant with INLIVIAN (formerly the Charlotte Housing Authority), we were given access to Universal Service Administrative Company (USAC), a platform that administers the ACP and enables us to view the backend of ACP enrollment. This insight has proven invaluable and has helped us develop new strategies to improve the quality and usefulness of the information we collect. We have implemented follow-up phone calls after distribution events to determine if residents completed the application and to offer assistance with any challenges they might face. Demographic information regarding age, race/ethnicity, and gender identity is also collected to help pinpoint any trends that could further impede the adoption process.

Trusted partners like Charlotte Mecklenburg Library, E2D, and Charlotte Mecklenburg Schools (CMS) collaborated with the CDE to further raise awareness for the program. The CDE also partnered with national non-profit, EducationSuperHighway to increase awareness of the ACP throughout Mecklenburg County and to train Digital Navigators and other partner organizations. These efforts will be carried out in close collaboration with the communities the CDE serves, with a particular focus on Charlotte's six Corridors of Opportunity:

- Graham Street / North Tryon
- Sugar Creek Road / I-85
- Albemarle Road / Central Avenue
- Beatties Ford Road / Rozzelles Ferry Road
- West Boulevard
- Freedom Drive / Wilkinson Boulevard



MAP LEGEND

CHARLOTTE'S SIX CORRIDORS OF OPPORTUNITY

- West Blvd.
- Freedom Dr./Wilkinson Blvd.
- Beatties Ford Rd./Rozzelles Ferry Rd.
- Sugar Creek Rd./I-85
- Graham St./North Tryon
- Albemarle Rd./Central Ave.

THEIR OWN DEVICES

KPI: Supporting the distribution of 20,000 laptops

Federal census data shines a light on the digital landscape of Charlotte, revealing the peaks and valleys of connectivity. The most connected areas of the community boast connection rates of 91 percent. But that rate falls below 80 percent for residents of most of the corridors — and even lower than the city-wide average of 85 percent. This is why our partnership with the City of Charlotte is so vital. Specifically, our Digital Navigators' holistic approach to supporting programs like Access Charlotte helps bring digital connectivity and all its benefits to thousands of Charlotte households.

Collectively our partners, Charlotte Mecklenburg Library and E2D, distributed over 27,000 laptops between July 2022 and June 2023 exceeding our initial goal of 20,000 devices. In addition to providing laptops, these distribution events showcased the CDE's Digital Navigator service.

Real-time support and access to vital resources, empowered residents to maximize the potential of their new devices. This holistic approach to serving the community is vital to our mission.

Charlotte Mecklenburg Library received funding from the Emergency Connectivity Fund (ECF) to purchase and distribute 20,000 laptops.

INCLUSIVE
CDE team members provide Charlotte residents in-person support.

IMPACT STORY

LEVELING THE DIGITAL PLAYING FIELD

Charlotte Mecklenburg Library Connects the Community with Free Laptops

The Center for Digital Equity has played an integral role in developing and fulfilling like-minded partnership missions. Two collaborative efforts include the Charlotte Mecklenburg Library and E2D—a non-profit organization providing residents with low and no-cost laptops.

Emery Ortiz, chief strategy and innovation officer with the Charlotte Mecklenburg Library, and Pat Millen, co-founder and president of E2D, understand the importance of digital equity and have been working diligently to address the community's need for functional devices.

WHO IS DOING THE WORK?

The Library currently allows residents to borrow hotspots and Google Chromebooks, but they wanted to do more. Joining forces with E2D and the CDE was the first step.

Millen started E2D in 2013 when his 12-year-old daughter, Franny began voicing concerns about student access. Now, the organization has served over 30,000 families and provided resources at 167 schools in Charlotte Mecklenburg County.

SOLVING THE PROBLEM

There are many reasons why people need devices with employment, healthcare, education, and digital literacy being the biggest. Ortiz explains how these four areas impact residents.

"So many jobs moved to either all remote or at least partial remote options, and if you do not have devices and knowledge on how to navigate that field it can limit your opportunities."

Community laptop distribution has been an effective way to provide devices to residents who need them.

Additionally, Ortiz observed how the pandemic exposed the need for digital equity, "After COVID, almost everything transitioned online. Whether or not it was a predominately online industry before, like banking. Everything took a hard shift," she said. "The school system also had to migrate to online learning. Students without devices at home fell behind in their curriculums".

The Charlotte Mecklenburg Library has long recognized the need for digital equity Ortiz explained. "What the library has always aimed to do is increase the amount of opportunities that anyone can have in the community regardless of socioeconomic background. Regardless of where in the city you live, The Library just really wants to make those opportunities available."

E2D has adopted a similar, all-inclusive approach. "We do pretty good marketing of our products. One hundred percent of the people that are getting a computer from us are by definition low income," Millen said. However, he feels it's essential to meet residents where they are. "We used to go directly to area high schools and market to school-age families (in Charlotte Mecklenburg County). Now we don't care. If you have a need, we want to fulfill it."

Beyond the obvious need for devices, Millen feels everyone should have access to information. "People having the ability to seek information on their terms is very important."

FULFILLING THE NEED

While the library was awarded an $8 million grant from the MeckTech Computer Program, the funds only covered the cost of devices. The CDE stepped in and provided additional funding to help with implementation, supplies, and volunteers on distribution days. From September 2022 to June 2023, the library distributed 20,000 devices. The 11 distribution days were held at Avidxchange — a central location for residents between Uptown Charlotte and the North End area.

Recipients were required to be at least 18 and show proof of residency in Mecklenburg County. The CDE was on site to help residents sign up for The Affordable Connectivity Program (ACP), a federal program providing free or discounted internet.

Ortiz said the program has been overwhelmingly positive for residents. "We have received so much positive feedback from laptop recipients. So many of them were senior citizens without experience owning technology."

E2D's partnership with the CDE has helped streamline their efforts. "When we paired people with computers, we also tried to get them access to digital skilling, but as time moved on the CDE became more engaged and took over most of this aspect."

THE FUTURE OF THE DEVICE DIVIDE

As the mission continues, thoughts about the future of technology and resident needs are at the forefront of the CML and E2D's plans. "There is no finish line," Ortiz said. "It is always progressing and constantly advancing."

Ortiz said CML will continue to champion the community's need for digital skilling. "The public library system hopes to be a strong digital literacy component for all. Since we have 21 locations and a dedicated workforce, we want to help teach and get people comfortable with technology."

She credits collaborations for success, 'With the great work the CDE is doing, and our great corporate partners in Charlotte, funding and opportunities for refurbishing devices will be plentiful."

Millen is on the other end of the spectrum. "There will be no need for E2D in a few years because everyone will have access to a fully functioning computer." Like Ortiz, Millen credits the diligent work of his organization and CDE's collective mission. Because of partnerships like these, digital equity is within reach.

"So many jobs moved to either all remote or at least partial remote options, and if you do not have devices and knowledge on how to navigate that field it can limit your opportunities." — *Emery Ortiz*

INNOVATION
Community Council member leads ideation session at TechRising Summit 2023.

DIGITAL NAVIGATION AND TECHNICAL SUPPORT

THE JOURNEY OF 1,000 STEPS BEGINS — WITH A MAP

KPI: Development of the Journey Map

The pathway to digital inclusion is anything but straight and obstacle free. Visualizing the desired end result at the beginning can help manage issues as they arise. This proactive approach to problem solving has led to an exciting new project — the creation of a journey map. A journey map is a user experience (UX) document that details, or maps, the necessary steps toward accomplishing a goal.

We created a special task force from our Community Council to work on this project. The Community Council is a mix of residents and partners dedicated to our mission, and we are proud of this alliance. The task force includes: Byron McClendon from Ernst & Young, Renee Carter from PerScholas, Kimberly Edmonds, William McNeely from DoGreater, Chantez Neymoss of the Charlotte Mecklenburg Library and CDE Program Directors Ameera Bratholomew and Amy Crippen.

Led by Barings Head of Client Experience Strategy Enablement, Sarah Dudley, the team has already begun work on this audacious task. Ernst & Young spearheaded the development of eight personas or fictional target users who mimic the needs and desires of the true target audience. These personas will be used to understand the consumer better and will help inform design decisions throughout the project. We are currently seeking a UX designer to develop the first version of an interactive, web-based version of the journey map and expect this task to be completed by the second quarter of fiscal year 2023-2024.

This is a shining example of the level of commitment our corporate partners have for our shared goal of making Charlotte the most digitally equitable community in the nation.

THE RULES OF ENGAGEMENT

KPI: Developing SLA and OLA between key service partners

Having clearly defined, public-facing agreements with our partners is essential to maximizing favorable outcomes for our constituents and meeting or exceeding the goals we set. We have made progress in defining our Service-Level Agreements (SLA), which govern how the CDE engages with community members and individuals. Transparency and trustworthiness are crucial in our dealings with the community, and responsiveness to our customer base is key. We aim to respond to anyone who contacts us within 48 hours, setting expectations for caring and accessibility from the start. Consumer-friendly automation and a trackable ticketing system are also under consideration.

An Operating-Level Agreement (OLA) sets expectations for business partnerships. Certain parameters outline the existing alliance between CDE and the City of Charlotte. We are now working to create the same level of expectations and agreements with Spectrum, a third party, to our agreement with the City. The City currently funds two Digital Navigators dedicated to city initiatives – most notably, Access Charlotte, a program that provides no-cost internet service for a certain number of properties.

TRUST
A Digital Navigator guides a Charlotte Resident through the Affordable Connectivity Program application.

THE TICKET TO EQUITY

KPI: Outreach to increase digital navigator ticket volume

Digital Navigators help community members navigate the pathways to digital inclusion. They assist with tasks like signing up for affordable home internet service, purchasing affordable devices, addressing basic connectivity issues and learning new digital skills. Our staff of Digital Navigators was on hand at many events to assist recipients and to create awareness for our Digital Navigator program. Since the fall of 2022, we have ensured the presence of Digital Navigators at all in-person events. E2D has also utilized Digital Navigators at their distribution events.

In 2022 our Digital Navigators responded to 614 tickets for various service requests. Remarkably, ticket volume increased to 3,050 tickets in 2023. The largest spikes in activity centered around our grassroots collaboration with Charlotte Mecklenburg Schools (CMS). In April 2023, students took flyers advertising the program home with their report cards. As a result, we were able to help more than 400 eligible families access high-speed internet service through the ACP. About 71,000 CMS students' families were automatically eligible for the program. Over 40 percent of those served were Spanish-speaking households.

Partners like CMS help increase visibility and awareness for the CDE and create an organic swell in demand for our services. These relationships are our most valuable asset. Continuing to leverage this exposure to expand our influence will be critical to our ongoing success.

Digital Navigators are our feet on the ground, our community agents who represent CDE in the community and help grow awareness for our mission. We knew bolstering our corps of Digital Navigators would be essential to continuing this positive trajectory, and we committed to expanding personnel in this area. Starting with two, part-time Digital Navigators, we hired two more who are funded by our contract with The City of Charlotte. These individuals will focus on city initiatives and the ACP through third-party partner Spectrum.

CDE DIGITAL NAVIGATOR FY23 NUMBERS

TICKET VOLUME
3,050

TOTAL CALLS MADE*
23,400

VOLUNTEERS
171

EVENTS SUPPORTED
37

TICKET VOLUME SEGMENTED BY HELP TYPE

1,958	726	380	216	25
Sign ups for Affordable Home Broadband	Purchasing Affordable Technology	Basic Device and Connectivity Issues	Learning New Digital Skills	Other

DIGITAL NAVIGATORS POWERED BY CDE

We now have four, full-time Digital Navigators (including the Access Charlotte Digital Navigators), one part-time Digital Navigator manager, and three part-time Digital Navigators from City Startup Labs' entrepreneurship program, for a total of eight Digital Navigators.

The Your Home Your Internet grant with INLIVIAN will allow the CDE to recruit five additional part-time Digital Navigators. The success of the CMS campaign generated an uptick in service requests which are managed by the Digital Navigators from City Startup Labs.

On June 18, 2022, the CDE and its Community Council activated the first phase of our corridor innovation campaigns in collaboration with the North End Community Coalition (NECC). This was the first in a series of county-wide resident engagement events. These events were designed to bring available resources directly to residents while also creating engagement opportunities for residents to co-create additional solutions.

At this time, we also implemented the Voice of the Citizen Survey sent to those served by CDE within the year. However, the federal government's Infrastructure Investment Jobs Act (IIJA) allocated significant funding for digital equity initiatives. One of the components of this legislation involved the creation of a state-level digital equity plan. As a result, North Carolina created its own survey. To avoid duplicating efforts, CDE created a new survey to assess the efficacy of the services we provided to our customers. Issued at the close of every single ticket handled by our Digital Navigators, feedback at this granular level is needed to improve our everyday interactions with those we serve.

PERSONALIZED
Digital navigation services tailored to resident needs

IMPACT STORY

COMMUNITY IMPACT WITH PROVEN RESULTS

Charlotte Resident Receives Laptop for Career Advancement

While it may seem that every home has access to digital devices, many residents still lack this valuable resource. This void poses socioeconomic challenges for Charlotte-area residents related to employment, education, and healthcare.

Charlotte resident and mother of three, Tamika Okelly, shares how receiving a laptop through The Center For Digital Equity's community efforts and partnerships has advanced her professional development.

RECOGNIZING THE NEED

The most effective way to advance your career is through education, and many educational classes are now remote. Okelly wanted to take a few Microsoft Office courses offered by Goodwill, but she had one big problem. "The need was I could not afford to purchase one (a laptop). At the time, I couldn't afford to buy one from Goodwill for a couple of hundred dollars," Okelly said.

Although she is no stranger to computers, she knew she needed a refresh. "I was in the IT field when I went to college, but life happened, and I hadn't touched a computer or remembered anything." said Okelly. "I just wanted to get back to working with computers. It was important to take Office suite because things have changed."

CONNECTING TO RESOURCES

Earlier this year, Okelly began researching ways to get a laptop. She had previously used her local library's computer lab but needed something more accessible and permanent. During a Google search for affordable laptops, she found the Center for Digital Equity. Okelly said she requested a device and was contacted by Jarvis Miller, a Digital Navigator Manager with the CDE. Miller has been in his role for a year. "The Digital Navigator Service includes assisting community members in receiving affordable home internet service and affordable internet-capable devices," he explained.

In addition to these services, devices are free of charge. Digital coaching and technical support are also provided.

After a brief screening for income, address, and need, Okelly received a laptop in about a month. Since receiving her computer in April, she has completed her online courses and landed a job as data entry specialist. The CDE also noted her special request for a touchscreen device due to her struggles with arthritis.

LOOKING AHEAD

Residents need to know these resources are available because there are benefits to having your very own device. Okelly explained why this is important. "A few times I have been to the public library and used the computer. You reserve it, and there is a time limit because another person has booked it. With your own device, You can be on there for ten minutes or ten hours."

Although digital life moves fast, Okelly feels confident with where she is today. Sharing her thoughts on the future, she said, "Technology will be the standard."

She already has plans to continue her digital education, "In August, I am going to take another Excel class so I can get certification through Microsoft at the mastery level." She advises anyone needing a device to contact the CDE, "They would not regret it."

Miller believes the advancement of technology will help level the playing field. "The need for digital literacy classes will increase. Students must have computers, and technology is used throughout the classroom," he said. "Young adults are getting the training needed to use devices properly."

However, Miller feels accessing digital solutions will be difficult for some. "Access to the internet and devices will decrease because living costs are growing drastically," he said. "Families are barely able to afford mortgages and utilities, so it will be problematic to afford devices that must be replaced every other year."

Access to digital resources, Miller says, is a must, "From education to communicating with friends, just about everything is digital now. Because so much is done online everyone must have access, affordability, and skills development to function in our society adequately."

DATA, PROGRAM MEASUREMENT, AND RESEARCH

MINING THE DATA AND MINDING THE GAPS

This level of transparency and accountability is one of our core values. Collective impact. Collective accountability.

KPI: Corralling current data and identifying areas for improvement

Measuring our progress is critical. We collaborated with the City of Charlotte to initiate a system to corral the data as it relates to our Key Performance Indicators (KPIs). The first iteration of this effort was an ArcGIS story map. This interactive, web-based document tells the story of our progress through data via an interactive, digital interface. Information will be updated every six months.

We have also revised our data collection process to work in tandem with customer management solution tool, HubSpot. This effort will allow us to transfer what we have learned about our customers' needs into action items crafted to address them. We are also working with a private vendor to create an interactive dashboard which will be fed by data from the story map.

These efforts will help us determine where gaps in service exist. For example, many residents do not have access to reliable transportation, so establishing additional locations for digital literacy classes along Charlotte's public transportation routes could be helpful. The interplay between the map and dashboard could help pinpoint other issues making our services more accessible to our customers.

During the last quarter of fiscal year 2023, we began collecting digital equity data across the ecosystem with four key partners: Per Scholas, E2D, The Library and Goodwill. During this pilot venture, we vetted the efforts of these partners against the needs of the community in an attempt to identify service gaps or to highlight progress. The reports generated will be readily accessible to any interested party. This level of transparency and accountability is one of our core values. Collective impact. Collective accountability.

We will also implement a data management/governance process, which will clearly define guidelines for partners sharing data with CDE. Every month partners will submit a form with attention given to potentially sensitive issues like sharing data publicly and identifying preferred methods of data sharing and transfer.

LISTENING
Hearing directly from residents helps inform the strategy.

CO-CREATE
Public and private-sector partners create the next iteration of digital equity at the TechRising Summit 2023.

DIGITAL LITERACY AND SKILLING

BEGIN WITH THE END IN MIND

KPI: Increase use of Northstar for baseline assessment

Northstar Digital Literacy is a learning management system developed to help individuals learn and assess computer skills they need to work, learn and fully participate in today's fast-paced, tech-based society. Consisting of online, self-paced modules on various digital literacy topics, anyone can take an assessment for free.

We wanted to utilize this tool in our community and to increase usage among consumers. Proudly, we exceeded this goal increasing usage by 145 percent among organizations affiliated with our partners. We also added seven new partner organizations including: Renaissance West Community Initiative, Freedom Communities, Camino, Center for Community Transitions, Beatties Ford Road Vocational Trade Center, Care Ring, First Mt Calvary Baptist Church.

The Camino Center will play an integral role in increasing digital literacy among Mecklenburg County's Latino population. Currently, there is a pending request for funding to help purchase devices for the center.

Three of the seven new organizations are already reporting data around the use of Northstar. Most notably, we trained Charlotte Rescue Mission staff to use Northstar, which enabled them to host learning and informational sessions and to provide open hours for interested parties to ask questions. Participants are granted access to work on the assessments of their choice at home using self-paced modules. Ideally, we'd like to establish Northstar as a baseline. Its utilization of basic assessment modules is the perfect entry point for our customers.

COMMUNITY
Community Council partners bring thought leadership.

FROM LEARNING TO LEVERAGING

KPI: Hours of digital literacy sessions

A functional device is a powerful tool, and an essential one along the path to digital equity.

Yet, without basic digital literacy skills, its full potential can never be realized. Through partner-sponsored events, we helped 8,294 individuals take advantage of digital literacy sessions across the CDE ecosystem. Partners like the Charlotte Mecklenburg Library, Per Scholas, and Goodwill also hosted Northstar sessions. Additionally, through its DigiLit program, The Library offered basic skills and workplace classes.

PLOTTING THE COURSE

KPI: Develop version one of a digital literacy journey map

We will create a journey map to underscore the importance of digital literacy. We have created three personas and are currently seeking a User Experience (UX) designer to create an interactive dashboard by the first quarter of the next fiscal year. The journey map will create an image of the process of working with CDE from start to finish. For example, if a customer with no computer experience wants to learn how to code, the journey map would create an image — from start to finish — of all the steps and resources within the ecosystem they needed to help them reach their goal. It could look something like this:

1. **CONNECT**: Customer receives a device at a CDE-sponsored event
2. **LEARN**: A Digital Navigator helps the customer locate and a computer literacy course at the Library
3. **FOCUS**: Customer takes a coding class at Per Scholas
4. **IMPLEMENT**: Customer starts an internship with a local organization

EQUITY
CDE staff leverages resources at hand to provide a meaningful experience.

IMPACT STORY

DIGITAL LITERACY IN THE CLASSROOM

A Fresh Start: Center For Digital Equity Provides Support to Charlotte Rescue Mission

Charlotte Rescue Mission (CRM), is a non-profit focused on substance abuse recovery for men and women. Some of the mission's goals include helping residents find employment or return to school. Through a recent partnership with Charlotte Works and the Center for Digital Equity, CRM has implemented a digital literacy program designed to help residents learn vital skills to aid them on the road to recovery.

These collaborative efforts have benefited residents who come to CRM seeking a new beginning. "They come in and say, 'I have this problem and want to change,'" said Resource Room Manager Terry Wilder.

MEETING RESIDENTS WHERE THEY ARE

The digital literacy program began before Wilder joined CRM in January, but she understands how important this additional resource is to the people they serve. "My part is to get them ready to go out in the world in different areas, including digital literacy."

Although residents range in age from 18 to 70, the need for digital literacy is a common issue. For most residents this deficit is due to a lack of exposure. "Even if they are young, they might have been in a house with drug addiction. Once addiction kicks in, that is all they care about at that moment," Wilder explained.

PROGRAM OVERVIEW

CRM operates a four-and-a-half-month program to help residents get back on their feet. The last month of the program is dedicated to the digital literacy program. Some areas covered include: social media footprints, telehealth, understanding online classes, and Microsoft Word and Excel.

Each resident must pass 15 different areas to complete the program. They also receive a laptop from E2D, a non-profit organization that provides digital devices to Charlotte-area residents who need them.

Although the digital literacy program is only for residents, Wilder took her support efforts to the next level by completing the course herself. She happily shares her recent experience with two residents. "I had two ladies that shine out in my head. They knew nothing about computers, and one student couldn't even understand how a mouse works. She could operate it when she was done."

So far, Wilder has had about 50 women go through the mandatory program — and each of them completed the course.

A SECOND CHANCE

When thinking about the residents' future, Wilder is hopeful their alliance with the CDE will continue to help. "I like the opportunity the students have for digital literacy classes. It's awesome because some have been on the streets for years."

Wilder said these resources give residents the kind of confidence that comes from knowing you have educated yourself. "There are people out there that may try and knock them down because they know they are in recovery. Just because of that fact, it's just another thing that builds their confidence."

INTEGRITY
FCC Commissioner Geoffrey Starks, N.C. Governor Roy Cooper, Charlotte Mayor Vi Lyles and partners work to serve our community.

POLICY, ADVOCACY, AND ECOSYSTEM DEVELOPMENT

A PLAN OF ACTION

KPI: Developing a policy and advocacy agenda

Initially designed to fund highway and transit projects, the Infrastructure Investment and Jobs Act (IIJA) was amended to provide funding for broadband access in November 2021. Enacted by the 117th United States Congress, the IIJA is part of the foundation of the CDE's development of a policy and advocacy agenda. We reviewed federal and state-funding requirements to ensure that our plan fully considered the nine populations identified and supported by the IIJA. We developed a listening session format to replicate a policy agenda process and to aid us in establishing a sustainable tool for setting priorities each year. We are developing, documenting and implementing this process to ultimately draft a robust policy and advocacy agenda.

An effective policy and advocacy agenda hinges on receiving feedback from each of the nine covered IIJA populations. Since we don't have ready access to these groups, we partnered with organizations that serve these communities. These organizations form the Digital Equity Champion Cohort and represent their populations at listening sessions as part of a six-month, contractual collaborative process. In return, each organization receives a stipend from CDE, which covers the time/travel of individuals coming to meetings, and also funds efforts to replicate events or surveys tailored for their populations. It also covers whatever resources the organization might need to plan and execute events, surveys, etc.

PARTNERING WITH THE COMMUNITY

KPI: Supporting Recruitment and Onboarding of new partners/residents

Any resident of Mecklenburg County committed to helping make this the most digitally equitable community in America can be a resident partner as outlined by our Community Council charter. We recognize the power in working closely with those we serve and met our goal of installing 25 resident partners out of 59 overall partners.

Official partners must submit a partnership agreement. At the start of 2022 we created a governance document to manage these agreements.

Residential and organizational partners have different agreements to manage their disparate needs and the transfer of information with CDE. Community Council meetings are open to anyone, but only those who submit a partnership agreement can vote on items and influence ecosystem objectives.

CDE FY23 PRESS

PIECES OF COVERAGE
37

ESTIMATED VIEWS*
138K

AUDIENCE*
53M

BETTER COMMUNICATION. BETTER RELATIONSHIPS.

KPI: Supporting Communication efforts related to CDE primary activity

We implemented a calendar of events and created event categories for any partner, organization, or community member to add their events and receive a level of support from CDE. For example, if a local church is hosting a digital literacy class, they can add it to the calendar and receive Digital Navigator support for the event. This public-facing calendar fosters a two-way stream of communication between CDE, our partners and the community. We also began distributing a monthly newsletter. Previously, we would provide an agenda before each community council meeting. Based on feedback and requests for additional information, we expanded the agenda into a newsletter. Topics covered ranged from onboarding of new employees, CDE events, to state and federal updates.

Growing our volunteer corps was also an important part of our community outreach efforts. Within the past year, we increased the number of volunteers from 154 to 319. Advisory Board Member, Ernst & Young, helped in this effort by providing a large number of volunteers for many of the CDE's events.

TRANSPARENCY
TechRising Summit helps inform best practices.

ORGANIZATIONAL PERSPECTIVE

FUELING PROGRESS

Pushing the needle toward digital equity takes a collective effort.

We work with community partners every day to deliver solutions that help individuals compete and thrive in today's fast-paced, tech-driven society. But our contributions aren't always obvious. Often, we are the engine that powers the efforts of our community partners, humming quietly under the hood, funding initiatives and sponsoring events — driving home all the things that make it happen.

Addressed staffing needs to improve our ability to serve the community

- Hired two full-time Digital Navigators
- Hired one part-time Digital Navigator manager

Developed a marketing campaign publicly announcing CDE, including a logo revamp.

- Generated general interest and awareness for the CDE and Digital Navigators by sharing the brand story and the stories of partners, residents, and the Community Council
- Initiated a logo revamp to showcase the new brand identity.

Initiated an organization-wide diversity, equity, and inclusion strategy to ensure our organizational culture, policies and practices were reflected.

Some early findings include:

- Drafted our organizational values to guide the development of our culture and work
- Promoted data disaggregation in our collection and interpretation to inform our work
- Emphasized learning with respect to cultural competency among organizational leadership, staff and Community Council leadership

Appointed an official advisory board and are in the last stages of establishing governance.

The members of the advisory board are:
Reenie Askew
Leslie Johnson
Brad B. Wallace
Blair Stanford
Rob Phocas
Charles Thomas
Rich Majerus
Zachary White
Candace Salmon-Hosey
Andrew Bowen
Kenneth Kennedy
Emery Ortiz
Terik Tidwell
Crawford Pounds
Michael E. Giles
Pat Millen
Amy Huffman

Created baseline governance for the Community Council, putting a charter in place and establishing partnership agreements.

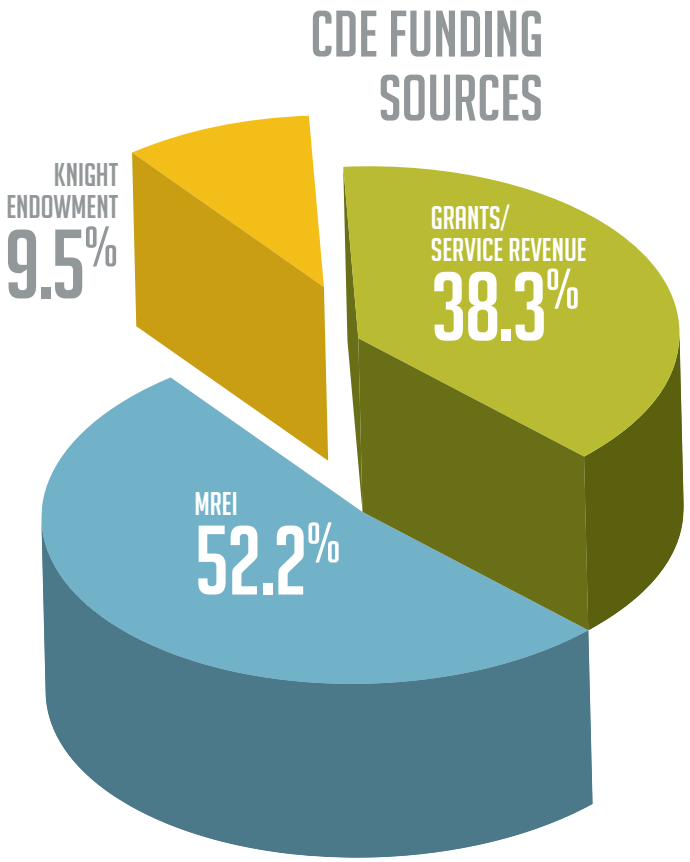
FINANCIAL DATA

FY2023 FINANCIALS

The Knight Foundation endowment, the CDE's original funding source, supports the basics of the organization's structure including staff development and personnel expenses for leadership.

In FY2023 grants/service revenue includes the following:

- The North Carolina Broadband Infrastructure Office to design, develop, and deploy **digital health literacy** in coal-impacted counties
- The City of Charlotte to support the Access Charlotte program through **Digital Navigator** service including the funding of two full-time digital navigators. The City was the first to invest in the development of one of the nation's first countywide digital navigator programs with the CDE *(under previous organization name).*
- CharlotteWorks to support an ongoing **digital literacy** collaboration with Charlotte Rescue Mission. Approximately $30,000 of this funding was utilized to purchase devices for participants through our partner E2D.
- North End Community Coalition to support a year of connectivity for devices and **digital literacy** sessions funded by Knight Foundation.
- Your Home Your Internet federal grant through INLIVIAN to support a campaign around the Affordable **Connectivity** Program through the Digital Navigator service including the funding of five part-time digital navigators to be onboarded in FY2024.



Mayor's Racial Equity Initiative (MREI)

FY2023 was the first year the CDE received MREI funding. This funding allowed CDE as the lead agency of the initiative's digital equity pillar, to develop and implement foundational components that will continue to support the scaling of a sustainable digital equity framework. Nearly half of this year's funding was allocated to community-driven initiatives (referred to as corridor innovation

Continued on next page

HIGHLIGHTS OF CORRIDOR INNOVATION FUNDING FOR FY2023

MeckTech	33%
Policy work *(consultant, organization stipends/other incentives)*	19%
Community Council Technical upskilling around broadband and digital equity *(ILSR in progress to be completed FY2024)*	11%
Batteries for E2D laptops	8%
Data management	7%
Digital Literacy Collaborations	4%

funding). Approximately 75 percent of that portion of the investment was utilized through the CDE's Community Council.

Ideas that aligned with the Key Performance Indicators and created opportunities across the ecosystem were co-created and funded. Initiatives supported with this part of the investment include the Library's MeckTech (laptop distribution) program, a community-centric plan to inform policy and advocacy agenda development processes, batteries for approximately 800 E2D laptops, and various "train the trainer" digital literacy collaborations.

The rest of the funding ensured the organization's structure could support the execution of the co-created initiatives. This included the addition of four full-time and five part-time team members. In addition, operational support items like HubSpot (customer management system used for communications and Digital Navigator service), community engagement materials, PR and marketing vendors, and staff development comprised about nine percent of MREI's total FY2023 investment.

Future revenue sources

Through IIJA and North Carolina's state-sponsored digital equity efforts, there are several upcoming opportunities for funding. Promising opportunities include: a possible $500,000 from the NC Division of Aging, and competitive grants and funding to support the implementation of the state's digital equity plan. Although many of the exact dollar amounts are unknown, part of our FY2024 planning includes creating a funding strategy with a field expert that will help us successfully approach some of the competitive opportunities as well as identify possibilities for more permanent and sustainable funding sources.