February 7, 2024

Matthew Conserva, Broadband Program Manager
NH Department of Business and Economic Affairs
Office of Broadband Initiatives
100 North Main Street
Suite 100
Concord, NH 03301

RE: New Hampshire Digital Equity Plan Comments

Dear Mr. Conserva:

Please see the attached comments regarding the draft *New Hampshire Digital Equity Plan 2024*. Note that the remarks are not comprehensive. We provide these comments to assist the State in developing a Plan that benefits Southwest NH and the State as a whole. Please contact me at 603-357-0557 or hunderwood@swrpc.org if you would like to discuss this further.

Sincerely,

Henry Underwood
Senior Planner

Attachment

Cc: Monadnock Broadband Group (e-mail)

Draft New Hampshire Digital Equity Plan 2024

Comments prepared by

Southwest Region Planning Commission

The comments below are organized based on the section of the draft Plan that they concern.

Inclusion Dimensions

1. During the COVID pandemic, Keene Housing assisted residents to obtain more affordable access to broadband.[1] The initiative is illustrative of the need for strategies that directly benefit residents of organizations like Keene Housing, Southwestern Community Services and others. New Hampshire should evaluate and consider leveraging existing programs like ConnectHomeUSA that have already implemented digital inclusion programing.

2. SWRPC notes that impactful economic opportunities are closely tied to skills in commercial software and demonstrated competence. Please consider how the Plan will identify such software as well as support initial and the ongoing needs of both employers and employees.

3. Educational opportunities need to support workforce needs today and into the future. Please consider how these employer needs will be identified and implemented (including in the low- and moderate-income populations).

4. Artificial intelligence (AI) represents both an opportunity and challenge for the State's plan. For example, prompt engineering may experience a high level of demand. Individuals will require training on how to use AI tools and understand content provided by them. The Plan should anticipate challenges and opportunities to improve digital equity.

5. Telehealth can help reduce healthcare costs and save time and money for providers and patients. Those that may benefit more include those that lack adequate transportation or have physical or cognitive disabilities. As part of the *Monadnock Region Digital Literacy and Access Needs Assessment*, SWRPC learned that challenges occur not just on the client side but also the provider side. Participating organizations identify that a shortage of available funding, trained staff, and knowledge, skills and abilities of clients represent barriers to improving the impact of technology-based services. Likewise, one organization notes that some videoconferencing platforms lack required privacy and other functionality and can be prohibitively expensive to obtain and integrate with other technologies already in use. Please consider appropriate strategies to address the needs for organizations serving covered populations.

6. It is unclear whether existing programs (such as the current partnership with the National Collaborative for Digital Equity, Bluum and AVID Product) offer an adequate supply of discounted devices, training opportunities, and equipment necessary to support the needs of specific populations. Please consider how a program providing such devices and services can be leveraged or initiated to meet demand.

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[1] [Keene Housing to help families afford Internet for remote education | Local News | sentinelsource.com](https://sentinelsource.com)

Goals, Objectives, Strategies and Metrics

1. *Overarching Strategy 2* describes the collaboration needed to fulfill the Vision of the State's Plan to achieve digital equity. New Hampshire's regional planning agencies, including SWRPC are uniquely qualified to fulfill tasks associated with forming, facilitating and overseeing the work of regional digital equity coalitions as described in the Plan. We offer a track record of convening broadband stakeholders going back to New Hampshire's Broadband Mapping and Planning Program funded through American Recovery and Reinvestment Act of 2009. This effort resulted in the development of first-ever regional broadband plans which cover the State of NH. In 2020, SWRPC also developed the *Monadnock Broadband Implementation Guide,* which has served as a key resource for municipalities looking to expand broadband connectivity, especially through what's known as "the Chesterfield Model," the public-private partnership approach pioneered in the Town of Chesterfield that combines financing through municipal issuance of broadband infrastructure bonds and infrastructure buildout and network operation by a private internet service provider (ISP). These two specific examples are illustrative of many others that demonstrate SWRPC's longstanding leadership on broadband issues.

   Regional planning agencies also offer a wealth of connections to covered populations and the organizations that serve them as well as multisector networks which include government, education, health and safety, business, and not-for-profit. One example of such a relationship includes support to organizations improving housing and public facilities for low-income individuals and households through programs such as the federal Community Development Block Grant Program. In addition, NH's regional planning agencies have expertise among staff and a longstanding reputation and demonstrated success working in subject matter areas including community and economic development, transportation, housing, public health, emergency management, broadband connectivity, and more. The Plan should identify specific roles in which NH's regional planning agencies can fulfill in various aspects of the Plan's implementation including a high profile and instrumental role with the regional coalitions referenced in the Plan. This model will benefit from the ability of regions to tailor implementation programs and interventions to the needs of covered populations and others.

2. While *Goal 1* acknowledges around 7% of locations in the state that remain unserved and underserved, this understanding lacks consideration for households that prefer to utilize or rely on out of necessity an internet connection through a mobile wireless network. In conducting the *Monadnock Region Digital Literacy and Access Needs Assessment*, SWRPC learned that smartphones are nearly as common as desktops or laptops and approximately 1 in 10 residents of certain communities have no other type of device. These trends should be considered in developing the Plan and should include appropriate strategies to address areas which experience poor mobile wireless coverage and quality as found in Southwest New Hampshire and other regions of the State.

3. The Federal Communications Commission's Affordable Connectivity Program may be destined to expire. This is a consequential change for Southwest NH and other areas that lack cable franchises, many of which have historically offered an income-eligible discount for service. This benefit will no longer be available to households covered by internet service providers (e.g., Fidium and TDS). Please consider appropriate activities for focus during the Plan's implementation, including a suitable replacement for ACP. An ideal program could be available regardless of the provider and be offered on a perpetual basis without grant funding.

4. The Plan refers to "more affordable Broadband" as well as "free or low-cost connectivity ($30/month or less). Ideally, there should be a consistent and objective definition. Otherwise, consider acknowledging this discrepancy in the Plan.

5. The Plan suggests the development of a "publicly available GIS map showing the locations of all known public Wi-Fi access points in the State." The Plan should explain the rationale and benefits of such a tool.

Implementation Framework

1. *Overarching Strategy 2: Foster a Culture of Collaboration and Stakeholder Engagement. (p. 27)* Comment #1 under the Goals, Objectives, Strategies and Metrics heading of these comments are applicable here as well. Accordingly, in this section, the Plan should identify specific roles in which NH's regional planning agencies can fulfill in this section – particularly with respect to regional stakeholder engagement, the use of regional digital equity coalitions and/or utilizing existing regional entities. NH's regional planning agencies have served for 50+ years and, as described previously, maintain the staff skills and expertise along with demonstrated experience and success in conducting such activities.

2. If the State continues to feature a role for the Asset Advisory Council during the Plan's implementation, consider whether technology vendors or internet service providers and others can supplement the current roster and/or provide additional inventory information to be used to address digital equity needs.

3. Keep in mind that some organizations representing covered populations rely on volunteers to deliver services and support. As volunteers, they do not have the capacity and expertise to both design and implement training to support digital literacy skills development.

Collaboration and Stakeholder Engagement

1. *Regional Coalitions*. (p. 33) Comment #1 under the Goals, Objectives, Strategies and Metrics heading of these comments are applicable here as well. NH's regional planning agencies are well-aligned and well-suited for playing a high-profile role in the success of the Plan – particularly with respect to regional stakeholder engagement, the use of regional digital equity coalitions and/or utilizing existing regional entities. NH's regional planning agencies have served for 50+ years and, as described previously, maintain the staff skills and expertise along with demonstrated experience and success in conducting such activities.

Baseline Data, Needs and Assets

1. The needs of employers are not well defined in the Plan. Such needs should be a focus of activity during the Plan's implementation. This will help ensure implementation actions meet New Hampshire's workforce needs.

2. Internet service providers represent key stakeholders as part of the implementation of the Plan. SWRPC notes there are specific needs and gaps that providers could demystify (e.g. "Of the state's 77 New Hampshire Broadband providers that participate in the ACP program, only 44 said they are willing to offer the device subsidy"). The Plan should include a strategy designed to understand the lack of participation and explore the potential for establishing a new program to meet the same need.

3. The Plan sets one metric: "increase by 10% annually the number of refurbished computers…" but does not provide a baseline. Ideally, all metrics should have a readily available baseline documented in the Plan for the purpose of measuring change over time.

General

1. As needed, please consider and integrate the list of assets and gaps as well as the recommended strategies identified in *Monadnock Region Digital Literacy and Access Needs Assessment (pages 56-57 and 57-58, respectively).*

2. The Vision and Goals of the draft *New Hampshire Digital Equity Plan 2024* are aligned with *Southwest New Hampshire Broadband Plan 2015.*
   a. *Southwest New Hampshire Broadband Plan 2015* identifies that "The availability of affordable and accessible broadband education/training opportunities would improve digital literacy and awareness." (p. 42) Since adoption of the plan, Southwest NH has not benefited from a substantial increase in education and training opportunities and therefore represents an unmet need in the region.
   b. Specific examples of strategies with a "high" priority ranking from the *Southwest NH Broadband Plan* that generally support the State's approach include but are not limited to:
      - Goal 3: Position broadband as a critical utility and a basic requirement for economic development, community vitality and sustained quality of life.
        o Strategy 3a.ii: Work with regional institutions, organizations, & communities to sponsor free & affordable training opportunities on broadband utilization
        o Strategy 3a.iii: Support existing and expanded programs for digital literacy for all levels of learners in regional educational institutions.
   c. Other strategies from the regional plan aligned with the State's approach with a "medium" or "low" priority ranking include by are not limited to:
      - Goal 3: Position broadband as a critical utility and a basic requirement for economic development, community vitality and sustained quality of life.
        o Strategy 3a.v: Establish high capacity broadband connection centers and/or public Wi-Fi networks in appropriate locations such as village centers and community institution
      - Goal 4: Respect those features that define the Region's cultural and physical landscape while meeting the broadband infrastructure needs of the future.
        o 4a.i. Establish opportunities for citizens to participate in or view public meetings remotely.
        o 4a.ii. Promote training & education for municipalities on utilizing broadband to encourage social & civic engagement.