

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider)
Modifications to the California Advanced) Rulemaking No. 12-10-012
Services Fund.)

**COMMENTS OF RADIO BILINGUE, INC.
ON PHASE I ISSUES**

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March 16, 2018

and to actually enroll Latino families. More recently we have partnered with Fresno State's Office of Community Economic Development . Essentially, Radio Bilingüe, as a trusted Latino messenger effectively works with our partners on the ground to attract Latinos to the Office of Community Economic Development so that the Office of Community Economic Development can guide the families through the complex, often confusing process of signing up for an affordable broadband plan for low income families.

Considering Radio Bilingüe's long and deep appreciation of the challenges faced by low income Latino families in securing adequate speed broadband at home, Radio Bilingüe respectfully makes the following recommendations to the PUC.

Radio Bilingüe, by reference, supports all the recommendations by CETF; this includes CETF's comments on the "Adoption Account", "Public Housing Account", "Infrastructure Grants Account", and the "Regional Consortia Account".

Radio Bilingüe, also by reference, supports our partner's comments, Fresno State's Office of Community Economic Development's comments and recommendations. These are drawn from the experience on the ground working in the San Joaquin Valley.

Radio Bilingüe would like to emphasize the importance of including support for community ethnic media in the area of Adoption Account. Outreach to low income families is one of most difficult challenges in the adoption effort. Our experience with our partners have shows the it is important to engage ethnic community media to draw prospective clients to the enrollment centers. It is imperative that it should be part of the strategy.

Radio Bilingüe also supports “Learning Circles” as explained in the CETF filing. We need to maximize energy and effort and coordinate with the limited resources available and learn from one another.

Radio Bilingüe supports the funding of community based call centers.

WHEREFORE, Radio Bilingüe, Inc. respectfully requests the Commission amend its CASF proposals contained in Appendix B as set forth above in these comments.

Respectfully submitted,

/s/ Hugo Morales

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Attachments:

1. Questions for Other Stakeholders on Adoption
2. Radio Bilingüe Audience Profile February 2017
3. Tulare County Audience Graphs
4. Radio Bilingüe's California Coverage Map

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Attachment 1: Questions for Other Stakeholders on Adoption:

1. What strategies and programs for improving adoption have you attempted? What worked and what didn't work? Why?
 - a. Radio Bilingüe (RB) collaborated with call centers services operated by 211 CA (211) and later with the Office of Community Economic Development at California State University Fresno (OCED).
 - b. The overall goals: Increase Latinos' access to broadband at home through low-cost service programs offered by ISP's and to improve their ability to access low-cost computers, broadband and digital literacy resources.
 - c. Radio Bilingüe produced and broadcast a comprehensive on-air radio campaign on its FM network stations in areas where call centers also operate. RB's campaign reached a total of 12 counties -- including 8 in Central California, 2 in the Central Coast, and Imperial and Mendocino counties. Additionally, audiences in Sacramento, San Francisco and Alameda County were reached through some of our CETF project programs and spots that aired through a partnership with commercial network stations KIQI/KADT. Since 2017 RB expanded services in Santa Barbara, San Benito, San Luis Obispo, Riverside San Bernardino and LA counties.
 - d. Campaign consisted of: 60-second educational messages, testimonials, live talk shows, and on-air 12-hour day marathons to refer listeners to call 211 and Fresno State for information on available low-cost broadband service options in their area.
 - e. RB also participated in outreach events at health fairs and community festivals in the San Joaquin Valley and Salinas Valley and engaged in outreach using postcards with the goal of encouraging people to call 211. The postcards were also distributed in the waiting rooms at community clinics in Fresno County.

Outcomes

- a. RB directed thousands of listeners to call partner 211 and OCED's call center for broadband adoption.
 - b. The Central Valley overall adoption increased from 53% in 2008 to 79% in 2016. Latino households increased from 34% in 2008 to 80% in 2016 (69% are only Spanish speakers).
2. What are the greatest challenges for adoption, and how can providers or state and local government address it?
 - a. Many do not qualify under the strict eligibility requirements of low-cost broadband programs offered by ISP's.
 - b. We learned that people required direct and personal assistance to complete the subscription process. Although 211 provided after hours and weekend live operator assistance, they only provided a referral number to an ISP

when many people needed additional help completing the paperwork required by the ISP's.

- c. Some rural areas still do not have a broadband infrastructure available in RB's coverage area.
- d. People who called Comcast's regular phone line were not provided any information about IE or referred to the dedicated toll-free number for the program.
- e. Coincidentally, this project was implemented during a time when low-income Latinos struggled to make ends meet partially due to what turned out to be a 5-year drought affecting RB's main coverage areas. All of the counties in the San Joaquin Valley and several other counties served by RB, including Monterey County, were declared a drought-emergency by California's Governor Brown

What we learned:

- a. Because low-cost broadband programs are designed by ISP's to serve the smallest number of clients possible, any future attempts to increase subscriptions needs to be more aggressive than just sharing with prospective subscriber the ISP's phone number.
- b. On call center operation: Our perception is that Latinos don't like to respond to long questionnaires over the phone and prefer to talk to a live person rather than leave a voice message. We believe there is also a need to have call center staff available to take questions after hours and during weekends.
- c. We shouldn't rely on project results that we cannot directly monitor or measure. Direct information is needed in order to tweak media campaigns in a timely fashion and as needed.
- d. Raising awareness about the benefits of broadband adoption should not be confused with promoting the services of certain companies. Our messages and talk shows aimed on the broader focus instead of on the ISPs.
- e. RB's coverage areas, mainly in California's agricultural regions, still have spotty broadband service due to lack of infrastructure. Another thing to consider is the fact that many low-income Latinos frequently move, which makes it difficult for them to obtain and keep broadband service.

Attachment 2: Radio Bilingüe- Audience Profile (selected)
- Based on Audience Research prepared for Radio Bilingüe by public media audience consultant Arthur Cohen:

RB listeners are predominantly Latino -- 95% identify as Latino/Hispanic.

RB listeners are low-income. Average household income: 38% earning less than \$25k/year, 26% earning between \$25-49k, 27% earning between \$50-74k and only 9% earning over \$75k.

RB listeners are families. Average household family sizes of 4 or more make up 68% of listeners, and many are young immigrant parents, with 57% of RB listeners reporting children in the home.

RB listeners are cross-generational: at time of 2009 study 32% of RB listeners were over 55, 25% were 25-44, 16% were 45-54, 14% were 25-34, and 14% were 12-24. The wide range of programs ensures relevancy for all age segments.

RB listeners have varying education levels: Study showed 32% of listeners had some HS education or less, 43% had some college education

Note: RB listeners include many considered “hard to reach” (by health, education, family-planning providers, etc.) These populations are generally Spanish-speaking low-literate farmworkers and other low-wage workers that include recently arrived indigenous-origin migrants. We know many are mixed-status families, including native-born citizens, naturalized citizens, legal and undocumented residents, new immigrants, etc. It is highly unlikely for many of these groups to be captured in Nielsen or other regular audience sample studies.

There is almost no duplication with traditional English language public radio listeners because very few of the Latinos that listen to Radio Bilingüe also listen to traditional English language public radio. Nationally, the public radio audience average age is 55 and white.

2/8/2017

Introduction to Tulare County audience graphs

Attached is a study based on actual Arbitron books on who listens to Radio Bilingüe in Tulare County in the San Joaquin Valley.

It compares Radio Bilingüe listeners and KVPR listeners in that county only. KVPR is the only NPR affiliate in Tulare county. Tulare County is 50% Latino. It is an agricultural county, the 2nd richest agricultural county in California behind Fresno County.

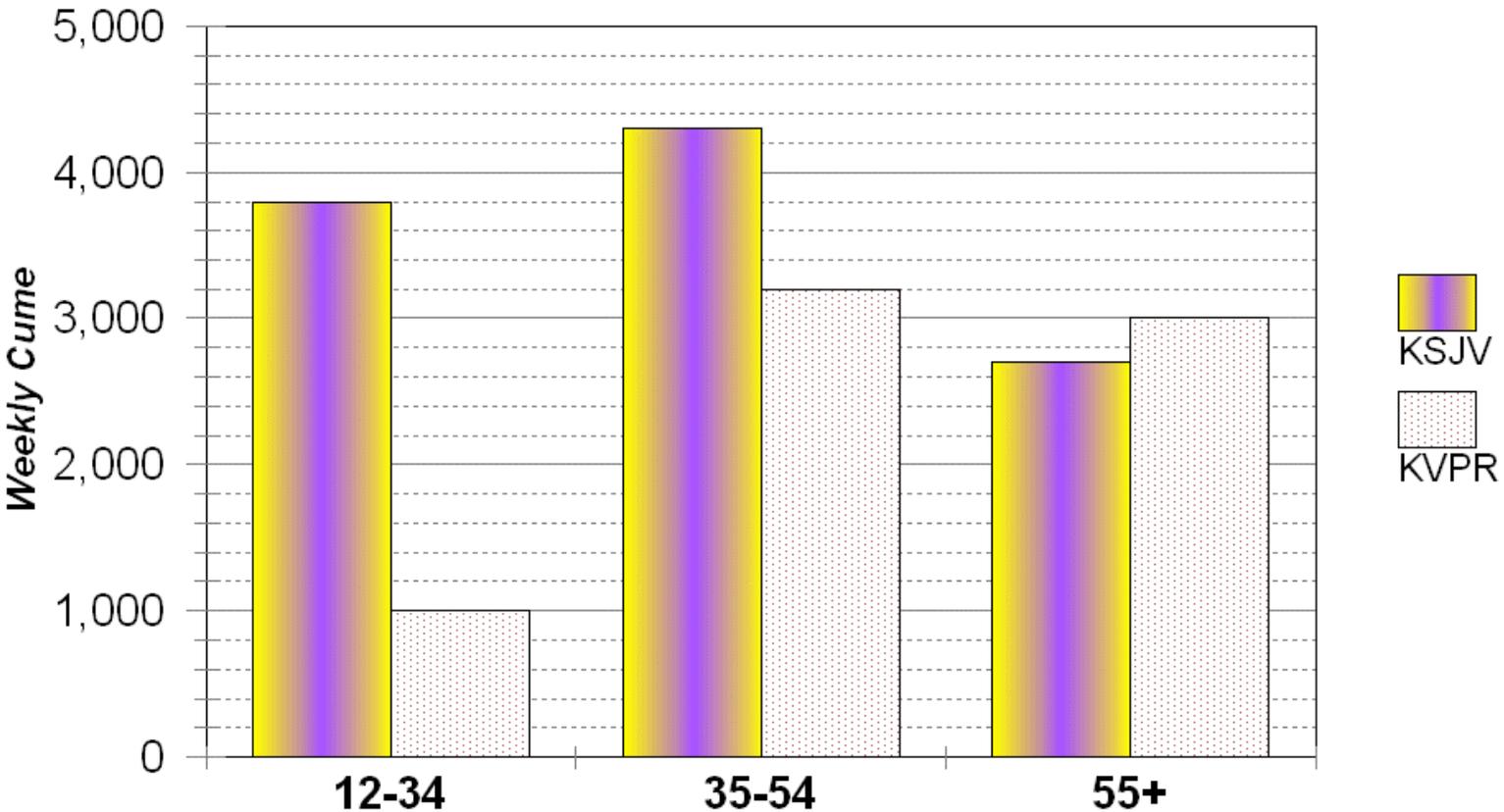
The study compares the age, education, ethnicity, and income of each station's audience.

Of note is the dramatic contrast between the two services. Only a handful of Latinos in Tulare County listen to NPR programming.

The Radio Bilingüe audience is much younger. The formal educational level of Radio Bilingüe's audience varies but it is predominated with those with less than a high school education. Most of Radio Bilingüe's audience is Latino.

KSJV & KVPR Audience Age - Tulare Co

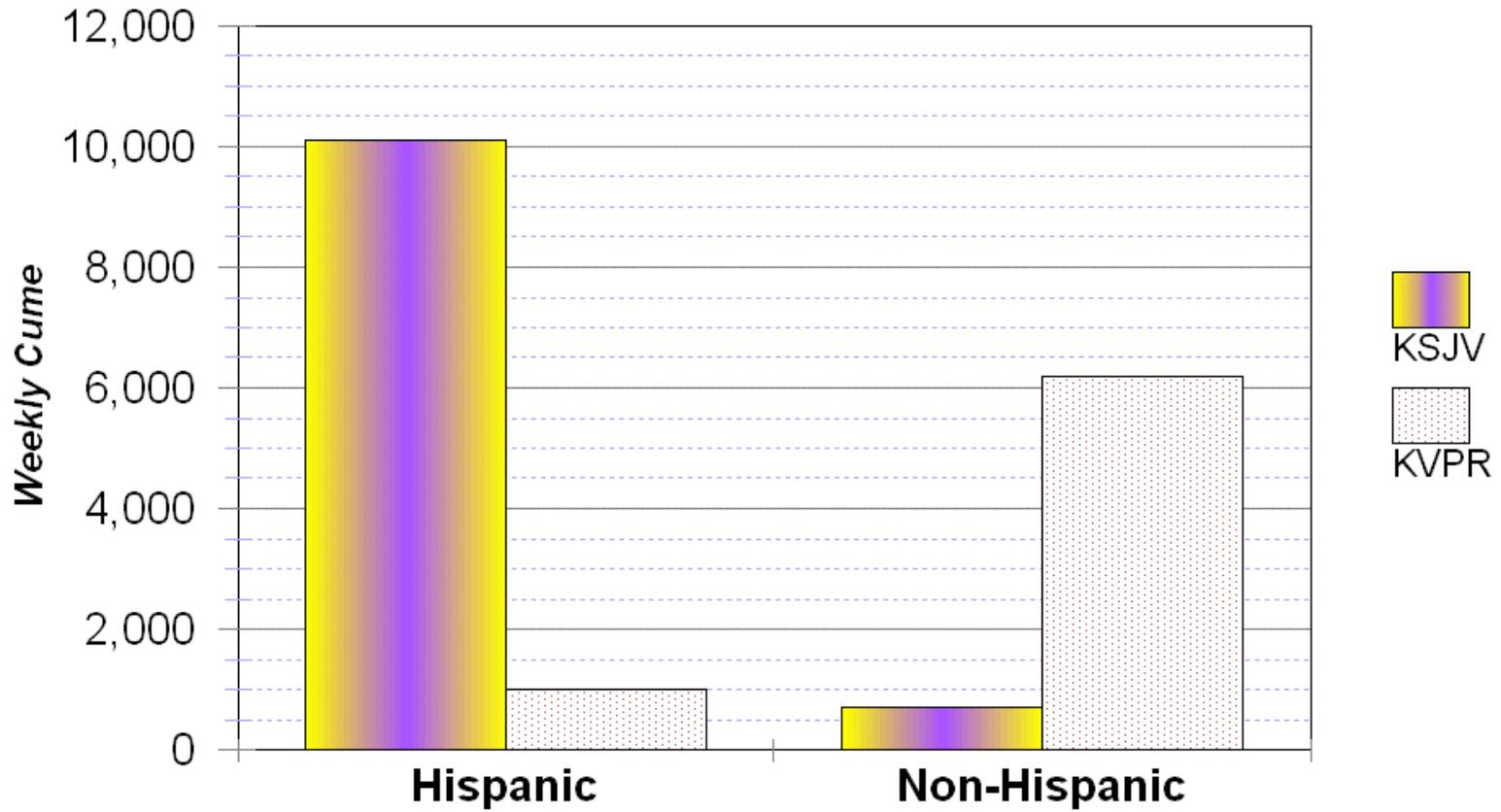
Fall 01 + Spring 02 + Fall 02



Data copyright Arbitron Inc.

KSJV & KVPR Ethnicity - Tulare County

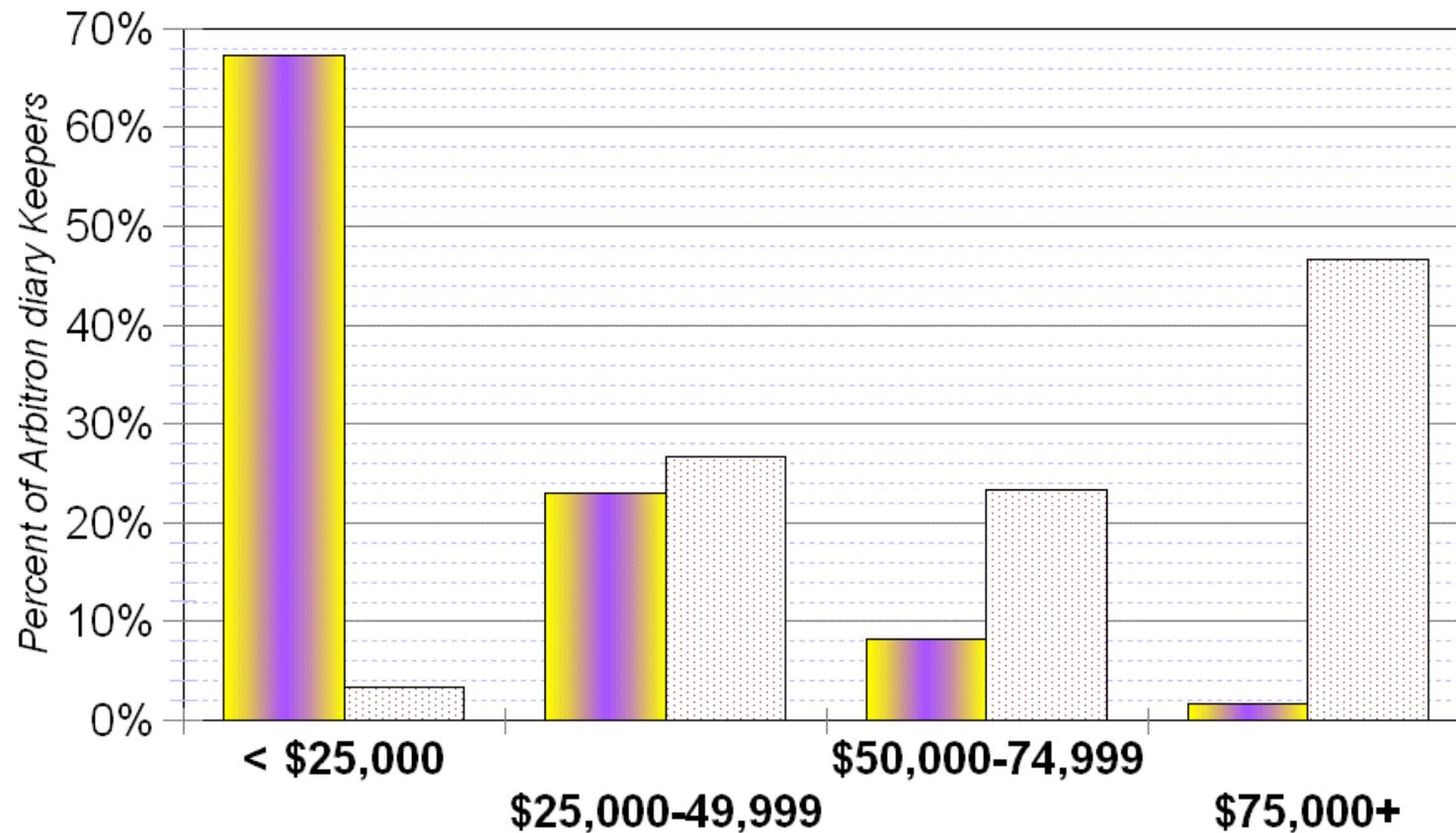
Fall 01 + Spring 02 + Fall 02



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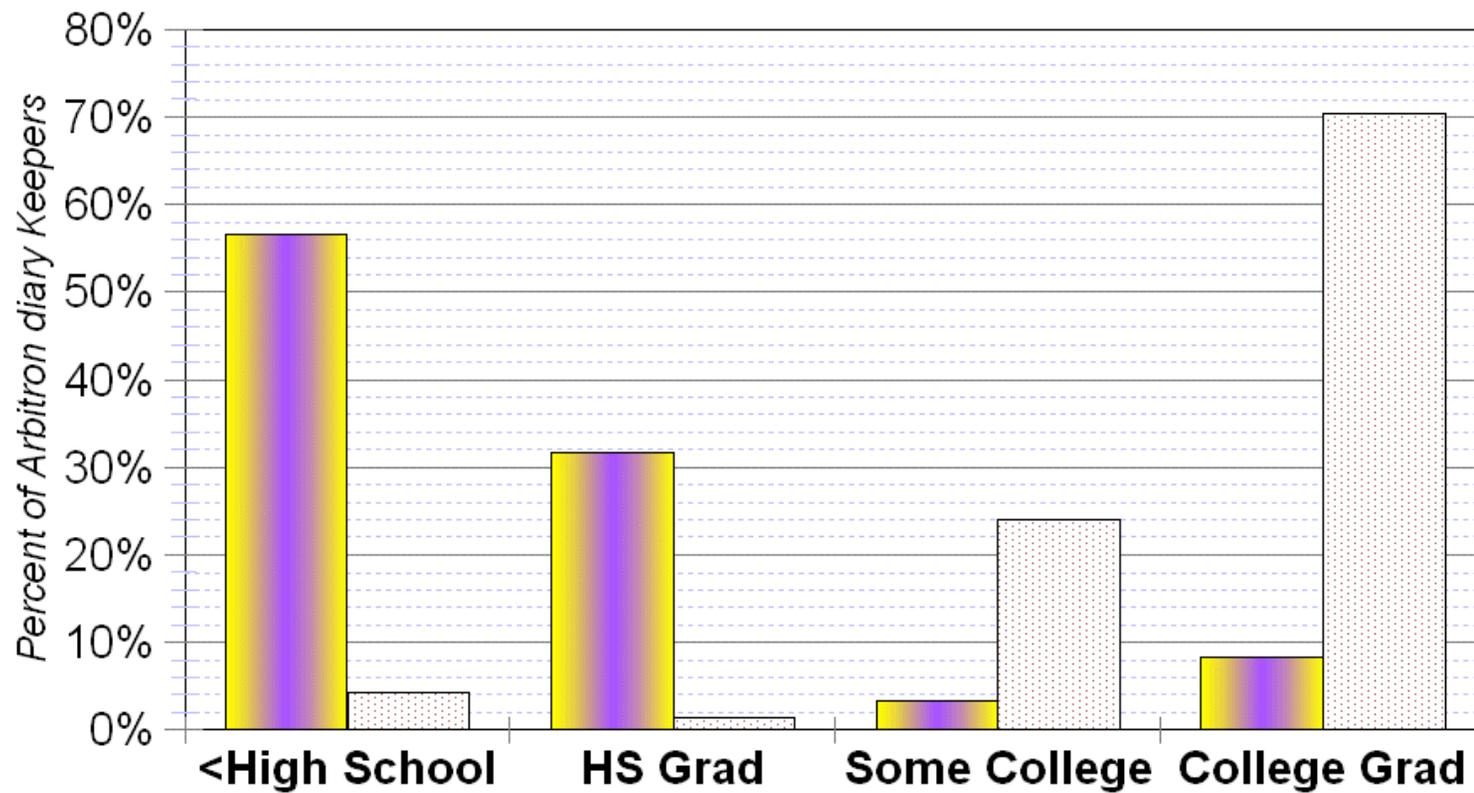
KSJV & KVPR Audience Income -Tulare Co

Fall 01 + Spring 02 + Fall 02



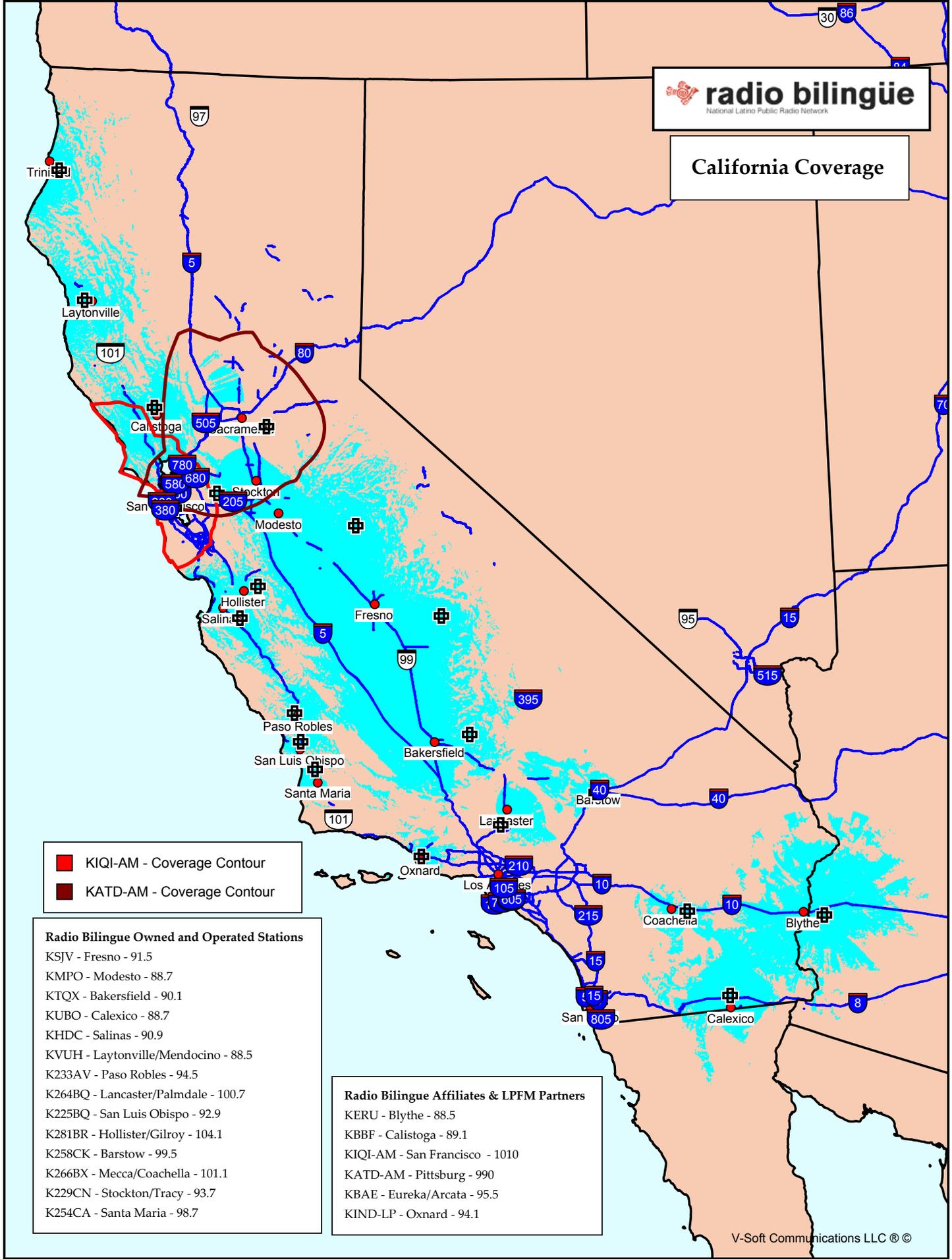
KSJV & KVPR - Education - Tulare Co.

Fall 01+Spring 02+Fall 02





California Coverage



- KIQUI-AM - Coverage Contour
- KATD-AM - Coverage Contour

- Radio Bilingue Owned and Operated Stations**
- KSJV - Fresno - 91.5
 - KMPO - Modesto - 88.7
 - KTQX - Bakersfield - 90.1
 - KUBO - Calexico - 88.7
 - KHDC - Salinas - 90.9
 - KVUH - Laytonville/Mendocino - 88.5
 - K233AV - Paso Robles - 94.5
 - K264BQ - Lancaster/Palmdale - 100.7
 - K225BQ - San Luis Obispo - 92.9
 - K281BR - Hollister/Gilroy - 104.1
 - K258CK - Barstow - 99.5
 - K266BX - Mecca/Coachella - 101.1
 - K229CN - Stockton/Tracy - 93.7
 - K254CA - Santa Maria - 98.7

- Radio Bilingue Affiliates & LPFM Partners**
- KERU - Blythe - 88.5
 - KBBF - Calistoga - 89.1
 - KIQUI-AM - San Francisco - 1010
 - KATD-AM - Pittsburg - 990
 - KBAE - Eureka/Arcata - 95.5
 - KIND-LP - Oxnard - 94.1