

**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 SATELLITE AFFORDABLE HOUSING ASSOCIATES (SAHA)
ON PHASE I ISSUES**

Chris Hess
Director of Resident Services
SAHA
1835 Alcatraz Ave
Berkeley, CA 94703
chess@sahahomes.org

March 16, 2018

technology for homework, and parents for telecommuting and applying for jobs. Immigrant families require internet service to connect with families around the globe, to advocate for their communities during extremely stressful political times, and to gain access to linguistic and cultural exchange in the U.S.

The following are our comments on the Public Housing Account Infrastructure Grant Program:

- We urge an exception to the SB745 requirement that applicants must be an “unserved” housing development, defined as one where at least one housing unit within the housing development is not offered broadband Internet, for subsidized developments with Extremely Low Income (ELI), senior and disabled households. The SB745 requirement has made the program ineffective in meeting the purpose for which it was created. Our experience and CETF’s preliminary studies tell us that ELI households in our buildings do not access existing services for low-income households because they cannot afford even \$10 or \$15 per month. Our residents—80% of whom make less than \$1,000 monthly—will walk many miles to avoid a \$1 bus transfer cost. Their nutrition comes primarily from donations and programs which we assist them in obtaining. Adoption rates will remain low among these populations without a publicly-provided service, because they are already making sacrifices of basic food and medical necessities. When the economic barrier is removed, adoption soars. Our study on one typical CPUC-funded infrastructure project showed that 120 devices consistently connect to our network in a 150-unit ELI senior building where we are conducting an adoption project.

- The infrastructure grant, implemented as broadly as possible, is an efficient mechanism to bring about internet adoption by extremely low-income residents, using the services of private industry ISPs. Because we reach dozens or hundreds of ELI households at once, a building-wide network generates many times more adoption than sporadic individual accounts. The infrastructure grant requires an ongoing operating match of thousands of dollars annually per building on the part of the provider, which SAHA and other organizations have been willing to raise. Our organizations can make the required operational sacrifices to contract for these services; expecting ELI households to sacrifice basic living needs to fund this access is much less realistic.
- SAHA supports CETF's proposal that the CPUC use funds in the Public Housing Account to study the status of adoption in all the complexes that were the subject of the previously-submitted infrastructure grant applications to get a better understanding of the barriers to broadband adoption in publicly-subsidized housing. Data collected previously and analyzed by the California Emerging Technology Fund (CETF) and the CPUC indicate that only about 20-25% of residents in publicly-subsidized multi-unit attached housing subscribe to market-rate offers, most are not aware of available affordable offers, and many cannot afford even the \$10-\$15 per month discounted offers if they did know about them. Further, the ISPs are not actively marketing their affordable offer in these kinds of housing complexes.

- The State should require ISPs to regularly and publicly report their progress on signing up low-income households in California for their available offers. Today there is no way to determine what is working and where to promote affordable offers and to target grants from the Adoption Account. Public reporting of progress is critical for transparency and accountability.

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

Respectfully submitted,

Chris Hess

Director of Resident Services
SAHA
1835 Alcatraz Ave
Berkeley, CA 94703
chess@sahahomes.org

March 16, 2018