Minnesota's Digital Opportunity Plan

EMPLOYMENT AND ECONOMIC DEVELOPMENT
OFFICE OF BROADBAND DEVELOPMENT

Contact Information

Department of Employment and Economic Development
Office of Broadband Development
Great Northern Building
180 5th St. E
St. Paul, MN 55101
651-259-7610
deed.broadband.equity@state.mn.us
mn.gov/deed/programs-services/broadband/

Upon request, this material will be made available in an alternative format such as large print, Braille, or audio recording.

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1.0 | Introduction

"I think everyone should have equal access to internet connectivity. It's an essential part of life in this day and age, and not having internet really inhibits opportunities for people." [1]

The Infrastructure Investment and Jobs Act (IIJA), also referred to as the Bipartisan Infrastructure Law, was passed by Congress in November 2021. This act appropriated a monumental $65 billion to fund the development of broadband infrastructure and the implementation of digital inclusion work on a national scale. Of this full appropriation, nearly $50 billion is being administered by the National Telecommunications and Information Administration (NTIA) at the U.S. Department of Commerce. This portion covers four program areas:

- Tribal Broadband Connectivity Program ($3 billion)
- Enabling Middle Mile Broadband Infrastructure Program ($1 billion)
- Broadband Equity, Access, and Deployment (BEAD) Program ($42.45 billion)
- Digital Equity Act Programs ($2.75 billion)
    - Digital Equity Planning Grants ($60 million)
    - Digital Equity Capacity Grants ($1.44 billion)
    - Digital Equity Competitive Grants ($1.25 billion)

This state digital opportunity plan is the primary deliverable required under the Digital Equity Act. It is funded through a State Digital Equity Planning Grant of $881,905.10[2] and has been prepared by the Office of Broadband Development (OBD) within the Department of Employment and Economic Development (DEED).

Submission and approval of this plan to NTIA enables the state of Minnesota to apply for and receive a federal State Digital Equity Capacity Grant from NTIA in the future. The capacity grant award amount, capacity grant application requirements, and capacity grant implementation timeline are unknown as of November 15, 2023. This makes it impossible to pinpoint the exact timeline after this plan is submitted; at the same time, this ambiguity creates an additional opportunity to pause, reflect, and imagine together what a digitally equitable Minnesota could look like and what it will take to get there.

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[1] Focus group, Minneapolis. Provided by Hired (Digital Connection Committee).
[2] Notice of Funding Opportunity (NOFO).

1.1 | Minnesota's Digital Future

1.1.1 | Vision Statement

This plan envisions a future where **comprehensive digital access connects all Minnesota residents to opportunities, options, and each other.**

1.1.2 | Goals

The following list provides a summary of Minnesota's digital opportunity goals as proposed. Digital connection depends on human connection. As such, OBD's intention with these three goals is to center people—not things—in all digital opportunity planning, activities, and solutions. Further details are spelled out at length in Section 3.0.

Goal 1: Connect People to People

This goal is grounded in the value of people coming together to help, advocate for, and learn alongside one another. Even as technology enables connections to far-away people and places, what happens here in Minnesota matters significantly as human connections build out social infrastructure.

Goal 2: Connect People to Information

This goal recognizes the significance of data and information as tools for advancing digital opportunities at both the local and statewide levels. It also aims to foster collaboration among diverse communities to create new avenues for data-driven digital opportunity decision-making.

Goal 3: Connect People to Resources

While the previous two goals are grounded in relationships and skills, this third goal pivots to look more closely at the concrete resources that Minnesotans need in order to access technology. This includes three key components: "broadband internet service; internet-enabled devices that meet the needs of the user; and applications and online content designed to enable and encourage self-sufficiency, participation, and collaboration."[3]

1.1.3 | Objectives

The following summarizes Minnesota's digital opportunity objectives. Achievement of these objectives will support Minnesota in achieving its aforementioned digital opportunity goals. Further details about each objective are provided in Section 3.0.

   (1) Internet adoption: Increase Minnesotans' adoption of broadband internet.

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[3] NOFO.

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(2) <u>Devices</u>: Increase Minnesotans' access to large-screen devices, such as laptop and desktop computers.

(3) <u>Digital skills</u>: Expand Minnesotans' access to digital skills training. This includes increasing Minnesotans' awareness of cybersecurity and privacy issues.

(4) <u>Accessibility</u>: Improve accessibility of web-based state, local, and tribal government information.

1.2 | Digital Opportunity: Scope and Background

1.2.1 | Defining "Digital Opportunity"

The concept of the "digital divide" first received widespread attention through a 1995 report from NTIA titled "Falling through the Net: A Survey of the 'Haves' and 'Have Nots' in Rural and Urban America." This report highlighted the disparities in internet access between rural and urban areas of the United States, emphasizing the gap between those who had access to technology and those who did not.
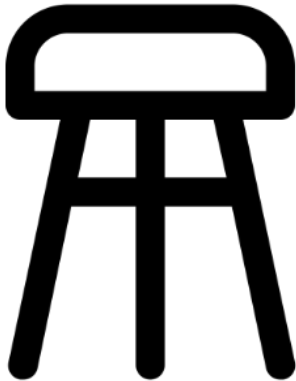
But reality is more complicated than "have" vs. "have not," particularly as technology has evolved. Acknowledging this, the multi-faceted nature of technology access was first represented using the metaphor of a three-legged stool in 2008.[4] In this metaphor, each leg of the stool—pictured to the left—signifies a different element of digital access. These three elements are (1) access to internet service; (2) access to an internet-enabled device; and (3) relevant digital skills. Without any one of these three elements, the stool is useless.

When this metaphor is used, the stool is often depicted exactly as it here: floating in the air, devoid of context. OBD could spend years trying to measure each leg of this stool but would still fail to summarize accurately the state of digital opportunity across Minnesota. Even as this plan may outwardly present digital opportunity as being about technological and informational connections, overall success depends on human connections.

Adopting a definition from the NOFO, *digital opportunity* describes "a condition in in which individuals and communities have the information technology capacity that is needed for full participation in the society and economy of the United States." Digital opportunity is achieved through several digital inclusion activities, also provided in the NOFO:

(1) reliable broadband internet service;

(2) internet-enabled devices that meet the needs of the user;

(3) applications and online content designed to enable and encourage self-sufficiency, participation, and collaboration;

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[4] Mossberger, Tolbert, and Franko, *Digital Citizenship: The Internet, Society, and Participation.*

(4) access to digital literacy training;[5]

(5) quality technical support; and

(6) basic awareness of measures to ensure online privacy and cybersecurity.

Absent from this definition but absolutely essential are trust, relevance, and safety. These conditions must be present in order for any individual to adopt technology in ways that are meaningful to them.

1.2.2 | Limitations and Possibilities

This plan exists in the middle of a particular kind of tension between what is permissible and what is needed. The gaps in digital opportunity that many individuals confront daily are often a consequence of long-term gaps in federal, state, and local policy that have allowed people to be left behind. For gaps to be closed in the long-term, new federal, state, and local policies need to be adopted. Without addressing the inequities built into this system, the same gaps will remerge and persist. It is, however, outside of the purview of OBD to independently recommend policy changes, serve as a regulatory body, or propose regulatory reform.

With that, **Minnesota's digital opportunity plan is an exploratory document coupled with programmatic goals that are achievable through a State Digital Equity Capacity Grant.** The three goals highlighted in this plan—connect people to people, connect people to information, and connect people to resources—are ultimately limited, nodding to the moments where connections happen rather than the real systemic work it takes to sustain connections. To do so, it will take people working together across the state with this shared vision. This plan presents an informational starting point.

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[5] This language is from the NOFO. OBD elects to use the phrase "digital skills" in place of "digital literacy."

2.0 | Planning Process: The Minnesota Model

"Access to high-speed internet is key to digital inclusion. Only then can people learn how to use it to access health care, education, business operations and social connectivity." [6]

For over a decade, Minnesota has been a nationally recognized leader in state-supported, statewide broadband infrastructure expansion. Minnesota's legislatively created broadband goals recommended by its governor-appointed Task Force on Broadband, its Office of Broadband Development, its mapping tools, and its Border-to-Border Broadband Development Grant Program are collectively referred to as "the Minnesota Model" by other state and federal policymakers who are looking to expanded broadband access for their residents.

The Minnesota Model is characterized by a four-part statutory framework which includes the following components:

(1) an Office of Broadband Development within the Department of Employment and Economic Development charged with numerous broadband oversight responsibilities, including digital inclusion;[7]
(2) forward-looking internet speed goals;[8]
(3) broadband deployment data and mapping capabilities to accurately plan, monitor, and track broadband infrastructure; and
(4) the Border-to Border Broadband Development Grant Program to provide matching funds for broadband infrastructure deployment in unserved and underserved areas.[9]

With this strong foundation of past experience and the existing local trust OBD has earned throughout Minnesota, OBD was able to think creatively and compassionately in designing Minnesota's digital opportunity planning process. OBD embedded opportunity in this planning process itself by prioritizing authenticity, cooperation, and relationship-building.

2.1 | Digital Connection Committees

Digital Connection Committees (DCCs) are the heart of Minnesota's digital opportunity planning process. They have served as leaders in ensuring this plan reflects the priorities, goals, and needs of all Minnesotans. Devised by OBD specifically for digital opportunity planning, DCCs are self-selected

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[6] Survey, Arrowhead region. Provided by Northspan (Digital Connection Committee).

[7] Minn. Stat. § 116J.39.

[8] Minn. Stat. § 237.012.

[9] Minn. Stat. § 116J.395.

workgroups formed on a voluntary basis by a variety of entities, including political subdivisions, tribes, non-profits, anchor institutions, faith-based organizations, Minnesota-based businesses, and more–or any combination of these.[10]

DCCs encapsulate Minnesota's diversity. Some DCCs are urban; some are rural. Some have just one or two members; others have twenty or thirty. Some have been working in digital opportunity spaces for many years; others are new to this work. Some are focused on reaching a specific group of people; some chose a broader approach. To honor these variations and encourage DCCs to work in the ways they find most meaningful and effective, OBD created a menu of opportunities from which DCCs could choose, outlined below:

Required DCC Responsibilities	Optional DCC Responsibilities
• Receive and share updates about the digital opportunity planning process as it transpires. • Allow OBD to list the DCC in a public directory.	• Gather local information about digital opportunity strengths, unsupported necessities, and systemic challenges. • Attend virtual networking sessions to meet and learn from other committees. • Provide feedback on a draft of the digital opportunity plan. • Act as a network of partners for OBD to call on as digital opportunity work progresses.

To draw attention to their work and illustrate the breadth, depth, and diversity of experience they each bring, every DCC that gathered and submitted digital inclusion data is cited in footnotes throughout this plan (some quotations have been lightly revised for clarity and space). Their contributions are deeply appreciated.

2.1.1 | OBD Support for DCCs

Assessing Digital Inclusion Mini-Grants

OBD provided targeted financial support for DCCs primarily through Assessing Digital Inclusion Mini-Grants. With inclusion in mind, OBD chose to make these grants non-competitive, awarding funds based on each individual application's completeness, timeliness, and adherence to the scope of the intended grant work. By awarding based on these three criteria rather than based on comparative merit, OBD was able to provide mini-grants of up to $4,000 each to 68 of the DCCs. Every DCC receiving a mini-grant was

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[10] A full list of DCCs that were registered by November 15, 2023 is available in Appendix A.

required to use their grant funds to prepare and submit the following four deliverables; DCCs not receiving mini-grants were also invited to participate as they chose:

(1) Evidence of having established a local Digital Connection Committee. This includes contact information for a committee leader and minutes from 2 meetings occurring during the grant period.
(2) Quantitative digital inclusion data.
(3) Qualitative digital inclusion data.
(4) An asset inventory identifying existing local resources that contribute to digital inclusion.

Instructions and Templates

To guide DCCs' data collection work, OBD prepared instructions and templates for compiling asset inventories, conducting surveys, convening focus groups, and holding individual interviews. In general, DCCs were welcome to pick which methods they used, which example questions they used, etc. OBD encouraged DCCs to gather data that was meaningful to them, and to use methods of information gathering that were most relevant and appropriate for their audience. To protect all individuals and not jeopardize trust between DCCs and communities, OBD did not accept any personally identifiable information.

2.1.2 | Digital Opportunity Planning Timeline

The timeline below outlines key milestones that the DCCs achieved during the digital opportunity planning process, which occurred entirely during 2023:

Date	Activity
January 25	OBD began recruiting DCCs during the Connecting One Minnesota kickoff event at Mystic Lake Event Center and online.
February 21	Mini-grant technical assistance webinar hosted by OBD: "Your Role in Creating Minnesota's Digital Opportunity Plan."
March 3	Assessing Digital Inclusion Mini-Grant applications due.
March 15	Grantee orientation webinar.
March 31	OBD began sending out updates, templates, guides, and other resources to all DCCs.
April 3	DCC data gathering activities began; start of performance period for mini-grant recipients.
April 12	Virtual informational session for all DCCs.

May 1–31	OBD held individual check-ins with grantees (required) and non-grantees (optional).
June 14	Virtual networking session for all DCCs.
June 30	DCC data gathering activities ended; end of performance period for mini-grant recipients.
July–August	OBD crafted a draft of the Digital Opportunity Plan.
August 21–September 29	Draft of the Digital Opportunity Plan released; OBD worked with DCCs to collect feedback on the plan via surveys, virtual meetings, and in-person gatherings.
October	OBD revised plan based on feedback.
November 30	Final draft of plan due to NTIA.

2.2 | Public Comment Period

The first complete draft of this plan was made available for public comment from Monday, August 21 to Friday, September 29, 2023. During this time, the draft plan was posted on OBD's digital opportunity webpage, made available in print form through public libraries statewide, and distributed in print form to people attending in-person digital opportunity listening sessions.

Comments were accepted in writing through an online submission form linked to OBD's digital opportunity webpage, in writing by mail to OBD's office address, and in spoken form during digital opportunity listen sessions. Additional information about written public comments can be found in Appendix O and Appendix P. Digital opportunity listening sessions saw 306 participants across 17 in-person and 2 virtual sessions. The complete list of dates and locations is provided in the chart below:

Date and Time	Location
August 29 1–3pm	Willmar Public Library 410 5th St SW, Willmar
August 30 1–3pm	Marshall-Lyon County Library 201 C St, Marshall
August 31 noon–2pm	JBS Fieldhouse 700 2nd Ave, Worthington
September 5 1-3pm	Dakota County Library: Wentworth 199 Wentworth Ave E, West St. Paul

Date and Time	Location
September 6 noon–2pm	Witoka Tavern 27983 County Road 9, Winona
September 6 3:30–5:30pm	Family Service Rochester 4600 18th Ave NW, Rochester
September 7 9:30–11:30am	Rice County Administrative Building 320 3rd St NW, Faribault
September 7 1:30–3:30pm	Bridge Plaza–2nd Floor Training Room 201 N Riverfront Dr, Mankato
September 12 2-4pm	UMN-Crookston, Bede Ballroom 2900 University Ave, Crookston
September 13 2–4pm	Fergus Falls Public Library 205 E Hampden Ave, Fergus Falls
September 14 12-1:30pm	Virtual Cohost: Minitex
September 18 2:30–4:30pm	Hinckley City Hall 106 1st St SE, Hinckley
September 19 2–4pm	Two Harbors Public Library 320 Waterfront Dr, Two Harbors
September 20 6–8pm	Deer River High School 101 1st Ave NE, Deer River
September 21 1–3pm	Hennepin County Library: North Regional 1315 Lowry Ave N, Minneapolis
September 22 11am–1pm	Range Association of Municipalities and Schools 5525 Emerald Ave, Mountain Iron
September 26 6:30–8:30pm	MN North College: Rainy River 1501 Hwy 71, International Falls
September 27 10am–noon	Northwest Minnesota Foundation 201 3rd St NW, Bemidji
September 27 2-3:30pm	Virtual Cohost: UMN Urban Research and Outreach Center

2.2.1 | Perceived Strengths

In many instances, OBD heard from Minnesotans who were largely satisfied with the draft Digital Opportunity Plan as it was presented. The overall strategy of using Digital Connection Committees to create the draft garnered positive attention for its creative approach, for the authenticity of the data it produced, and for its true dedication to equity.

The aspect of the draft most frequently praised was OBD's choice to supplement language around "assets, needs, and barriers" with "existing strengths, unsupported necessities, and systemic challenges." People identifying with and/or serving covered populations were especially keen to express gratitude for this reframing, finding it accurately and boldly identified the necessary power shift that needs to happen in order to make digital opportunity accessible for all.

2.2.2 | Out-of-Scope Suggestions

Add Strategies that Promote Broadband Infrastructure Expansion

The Digital Opportunity Plan cannot address infrastructure needs. These funds must support initiatives that are programmatic rather than capital in nature. Comments articulating infrastructure needs have been redirected to the staff at OBD who administer infrastructure funding.

Add Strategies that Prioritize Urban Governmental Entities

Several comments expressed that the draft plan's emphasis on rural was potentially harmful to urban areas of the state. OBD clarifies that this plan is required to address "rural" in name because "rural inhabitants" is a covered population identified with precision in the NOFO. Urban digital opportunity needs are not to be addressed on a geographic basis but rather through the additional seven covered populations who live across both urban and rural areas.

Some comments requested population-based funds for local governmental units to carry out digital opportunity projects. OBD affirms that no local funds will be awarded based solely on local populations (including local population counts of people identified as belonging to a covered population) without taking equity-defining measures of local wealth into consideration.

Add Policy Recommendations

The scope of the Digital Opportunity Plan is to strategize how the state will invest its federal State Digital Equity Act Capacity Grant funds. Proposing and/or enacting policy changes is outside of the scope of this plan and is not fundable through this program. In the State of Minnesota, policies changes are best recommended through the Governor's Task Force on Broadband, an appointed body that provides annual infrastructure and digital opportunity policy recommendations to the Governor and Legislature.

Address Native Nations Separately from "Minoritized Racial and Ethnic Groups"

OBD received a small number of comments suggesting that Native Nations should be addressed as a unique covered population separate from the "people from minoritized racial and ethnic groups" covered population. These comments came from individuals rather than from tribal nations. Minnesota statute provides protocols for maintaining positive government-to-government relationships between the State of Minnesota and the 11 federally recognized tribes sharing this geography. Comments from individuals addressing tribal-state relations are appreciated and cannot be acted upon outside of these protocols.

2.2.3 | Highlights of Actionable Recommendations

Include Agriculture

Commenters in Greater Minnesota identified an absence of strategies supporting agricultural businesses, including family farms. Agriculture forms the backbone of the rural economy throughout Minnesota, in particular the southern and western parts of the state. Precision agriculture has the potential to carry farming and agricultural practices into a strong future. In response to this recommendation, OBD has integrated strategies addressing agriculture from the business perspective.

Include Public, Educational, and Government (PEG) Access TV Services

PEG channels are an essential driver of civic engagement and foster transparency in local government proceedings. Through their services, PEG channels allow residents to participate in significant local decision-making processes and connect residents with accurate information about their local elected officials and current events. As more media is accessed and consumed digitally, PEG channels are expected to expand their offerings to include streaming services. However, this is often done with little to no extra funding. In response to this recommendation, OBD has integrated strategies addressing PEG channels.

Strive for Equity in Grants Administration

Public comments, especially those from people identifying with covered populations, responded positively to certain measures OBD proposed in order to promote equity in the grants administration process. These measures include making small, non-competitive grants available at least six months ahead of competitive grants so that under-resourced applicants have an opportunity to increase their capacity to be competitive. Additional measures—like equitable scoring rubrics, concise grant paperwork, and extended technical assistance—were also recommended. OBD will continue to reflect on this feedback leading up to and throughout the State Digital Equity Capacity Grant program.

3.0 | Goals, Objectives, and Strategies

Survey Question: "What efforts would you like to see your local government do in order to improve digital access for everyone?"

Respondents, ages 16–20:

- *"Understand that not everyone has money for these things."*
- *"Provide low cost or free internet to students."*
- *"Make it more accessible for those who have disabilities."*
- *"Have sufficient help for those who cannot afford technology or internet access."*
- *"I'd like to see the government thinking about sustainability and longevity of these things. How all of this can impact future generations."* [11]

As articulated in Section 1.2, Minnesota's digital opportunity plan is an exploratory document coupled with programmatic goals that are achievable through Minnesota's State Digital Equity Capacity Grant. The three goals, accompanying strategies, and aligned measurable objectives provided in this section stay within that scope.

Digital connection depends on human connection. As such, OBD's intention with these three goals is to center people—not things—in all digital opportunity planning, activities, and solutions. Affordable internet access, access to devices, and digital skills support are all essential tools in advancing digital opportunity; people create the systems that make the meaningful use of these tools possible. With this, each goal becomes measurable through the following objectives:

(1) Internet adoption: Increase Minnesotans' adoption of broadband internet. This is measured using ACS data describing the percentage of households that subscribe to broadband internet service.

(2) Devices: Increase Minnesotans' access to large-screen devices, such as laptop and desktop computers. This is measured using ACS data describing the percentage of households that report having at least one laptop or desktop computer available.

(3) Digital skills: Expand Minnesotans' access to training that supports digital skills and cybersecurity awareness. This is measured by using mapping data that describes the percentage of households located within a 60-minute round-trip drive or ride on public transit from the nearest public location (public library, community college, non-profit, CareerForce location, etc.) that provides free basic digital skills and cybersecurity support.

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[11] Survey, Minneapolis and Brooklyn Park. Provided by Minneapolis Youth Coordinating Board (Digital Connection Committee).

(4) Accessibility: Improve accessibility of web-based local and tribal government information. This is measured using an equally-weighted combination of three factors:

    a. the percentage of county, city, and tribal government websites that meet the accessibility standards set forth in Minn. Stat. § 16E.03;

    b. the percentage of county, city, and tribal government websites that reflect a Flesch Readability Score of 90 – 100; and

    c. the percentage of county, city, and tribal government websites that provide translations of certain essential information in alignment with local linguistic diversity.

3.1 | Goal 1: Connect People to People

Progress toward digital opportunity in Minnesota has for so long depended on two groups: First and foremost, it has depended on digitally resilient Minnesotans, that is, the people who live the digital divide every day. These are people who depend on public wifi, share one device across a family, or live in places where internet service comes at a high price for a low speed. This day-to-day resourcefulness is commendable, yet it should not be so necessary.

Second, progress toward digital opportunity requires advocates and educators, the people who share a vision where comprehensive digital access connects all Minnesotans to opportunities, options, and each other. In many instances, this group overlaps with the group described above.

This goal is grounded in the value of people coming together to help, advocate for, and learn alongside one another. Even as technology enables connections to far-away people and places, what happens here in Minnesota matters significantly as human connections build out social infrastructure.

3.1.1 | Strategies and Activities to *Connect People to People*

A. Minnesota's digital opportunity advocates and educators statewide are a strong, united group who can lean on each other for fresh ideas, new strategies, and consistent support.

    a. Pilot a structured Digital Opportunity Leaders Network that combines local energy, regional expertise, and statewide continuity.[12] The Digital Opportunity Leaders Network includes three tiers of participation:

        i. Local participation through Digital Connection Committees

        ii. Regional coordination and technical support for DCCs through contracted regional digital opportunity partners

        iii. State coordination for regions from OBD

    b. Convene an inter-agency digital opportunity workgroup with appointed membership from state agencies representing key partners and covered populations.

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[12] This concept has been modeled after the Minnesota Healthy Equity Networks.

    c.   Expand the Digital Connection Committee model of engagement through annual recruitment campaigns.

    d.   Retain existing DCCs through regularly scheduled virtual meetings and ongoing communication from OBD.

B. All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity.

    a.   Administer grants designed to pilot and expand digital navigation services, targeting rural cities, rural counties, and organizations across the state that both represent and serve covered populations.

    b.   Provide all CAP agencies, Centers for Independent Living, regional public library systems, veteran homes, and area agencies on aging a non-competitive funding opportunity to support clients with digital access and skills needs.

    c.   Prepare a report that explores models for a statewide technology assistance helpline.

C. All Minnesotans have access to a trusted provider of quality technical support.

    a.   Develop curriculum and administer grants designed to support high schools, after-school programs, and 2-year public and tribal colleges in hiring and training students to work part-time as paid tech repair technicians and technical support providers.

    b.   Administer grants to small businesses, including agriculture, to determine their technology needs in order of priority and improve their technology access.

3.1.2 | Alignment with Measurable Objectives

(1) <u>Internet adoption</u>: Increase Minnesotans' adoption of broadband internet.
(2) <u>Devices</u>: Increase Minnesotans' access to large-screen devices.
(3) <u>Digital skills</u>: Expand Minnesotans' access to digital skills and cybersecurity training.
(4) <u>Accessibility</u>: Improve accessibility of web-based state, local, and tribal government information.

Strategy	Objective(s)	Covered Populations	Notes
A	1, 2, 3, 4	All	Coalitions, professional support, and cross-sector communications form an essential foundation in all digital opportunity work.
B	3	All	While this strategy focuses on skills, it is likely that the relationships formed between digital navigators and their clients will also align with objectives 1 and 2.
C	2, 3	All	N/A

3.2 | Goal 2: Connect People to Information

Technology can connect people to an incredible wealth of data and information. However, for this data and information to be truly meaningful, both sets first need to be discoverable and accessible. This goal recognizes the significance of data and information as tools for advancing digital opportunities at both the local and statewide levels. It also aims to foster collaboration among diverse communities to create new avenues for data-driven digital opportunity decision-making. Information gains its value by the ways people use it to fuel change.

Transparency is a key value at the core of this goal, emphasizing the importance of open access to information as well as the expert assistance it sometimes takes to make meaning out of it. Making data and information readily available allows for collaboration and informed decision-making, empowering communities to bridge the digital divide and fully utilize the resources offered by technology. By championing accessibility, this goal simultaneously ensures that everyone has an equal opportunity to benefit from digital availability of information.

3.2.1 | Strategies and Activities to *Connect People to Information*

A. **Minnesotans can access comprehensive data and mapping tools to evaluate digital opportunity in their area as well as statewide.**
   a. Expand OBD's staff to include a position supporting digital opportunity data collection and analysis.
   b. Build upon OBD's broadband infrastructure maps to include measures of digital opportunity, similar to Purdue University's Digital Divide Index.
   c. Enhance readily available data with additional data measuring baseline digital skills across covered populations.
   d. Incorporate into OBD's web resources a directory of digital opportunity resources and partners for public reference.
B. **All Minnesota townships, cities, counties, and tribes have the opportunity to create localized data-driven digital opportunity plans to support their residents and tribal members.**
   a. Administer non-competitive formula grants to townships, cities, counties, regional development commissions (RDCs), and tribes that seek funding to conduct local evaluation and develop their own digital opportunity plans.
   b. Allow townships, cities, counties, RDCs, tribes, and other entities to contribute data collected under formula grants to OBD's comprehensive digital opportunity data and mapping tools.
   c. Partner with UMN Extension to develop curriculum and deliver a cohort-based training series for townships, cities, counties, RDCs, and tribes new to digital opportunity planning to receive additional guidance and support.
C. **Township, city, county, and tribal government units have the opportunity to re-design their websites so that they are fully accessible to people with disabilities and people with limited English literacy skills.**

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a. Conduct a comprehensive evaluation of township, city, county, and participating tribe websites to determine where and how web accessibility can be most effectively improved.

b. Administer non-competitive formula grants to townships, cities, counties, and tribes that seek funding to re-design websites in line with heightened accessibility standards, including translating essential materials to reflect local linguistic diversity and incorporating plain language where feasible.

c. Administer non-competitive grants to PEG channels to pilot and expand availability of digital services.

3.2.2 | Alignment with Measurable Objectives

(1) <u>Internet adoption</u>: Increase Minnesotans' adoption of broadband internet.
(2) <u>Devices</u>: Increase Minnesotans' access to large-screen devices.
(3) <u>Digital skills</u>: Expand Minnesotans' access to digital skills and cybersecurity training.
(4) <u>Accessibility</u>: Improve accessibility of web-based state, local, and tribal government information.

Strategy	Objective(s)	Covered Populations	Notes
A	1, 2, 3, 4	All	Robust, publicly accessible data is a component of the foundation in all digital opportunity work.
B	1, 2, 3, 4	All	Successful digital opportunity work requires proactive thinking.
C	4	Modern Elders People with Disabilities People Experiencing Language Barriers	"Accessibility" includes web design standards supporting the needs of people with disabilities; use of plain language when appropriate; and translation of certain essential information in alignment with local linguistic diversity.

3.3 | Goal 3: Connect People to Resources

While the previous two goals are grounded in relationships and skills, this third goal pivots to look more closely at the concrete, objective resources that Minnesotans need in order to access technology. This includes three key components, which are spelled out as follows in the State Digital Equity Planning Grant NOFO: "broadband internet service; internet-enabled devices that meet the needs of the user;

and applications and online content designed to enable and encourage self-sufficiency, participation, and collaboration."[13] Digital skills are addressed more thoroughly in the preceding goals.

As highlighted throughout Section 5.0 of this plan, the presence and availability of these resources alone is not enough to connect every Minnesotan to digital opportunities in the long-term. Relationships matter. Digital skills matter. Issues surrounding affordability are pervasive across all eight covered populations. Affordability creates a certain digital precarity that can result in a person having full access to technology one day and no access the next. *Eliminating* issues of affordability altogether is beyond the scope of this plan. However, this plan can propose a more holistic, comprehensive, and accessible social infrastructure aimed at *reducing* a person's digital precarity.

3.3.1 | Strategies and Activities to *Connect People to Resources*

A. **All Minnesota households have the option to afford the internet service available at their location.**
   a. Expand OBD's staff to include a position supporting federal and statewide outreach and coordination for Affordable Connectivity Program (ACP), Lifeline, and other programs reducing internet costs for low-income households.
   b. Collaborate with Minnesota Housing, EducationSuperHighway, North Country Service Cooperative, and other housing partners to improve internet and device access for Minnesota's apartment, multi-dwelling unit, and manufactured housing residents.
   c. Prepare a report that explores potential models for a statewide program similar to ACP and Lifeline to reduce internet costs for low-income Minnesota households.

B. **All Minnesota adults have the option to afford a large-screen device or smartphone, whichever most efficiently helps them access the applications they require.**
   a. Research models for a statewide program similar to ACP that offers a device discount for low-income Minnesotans.
   b. Prepare a report that explores sustainable state-managed system for circulating large-screen devices as long-term loans through collaborating public programs.

C. **New digital opportunity pathways reach Minnesotans who are at high risk for being digitally excluded.**
   a. Collaborate with Minnesota Department of Corrections and the Minnesota Career Education Center to ensure incarcerated Minnesotans and Minnesotans who are re-entering society receive full re-entry supports connecting them to digital technologies when legally permissible.
   b. Collaborate with DEED's Office of New Americans to support access to digital skills training and resources for immigrants and refugees.
   c. Partner with DEED's CareerForce locations to expand digital skills training and resources for career seekers.

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[13] NOFO.

d. Administer competitive grant funding to municipalities and organizations that are conducting digital opportunity work to serve covered populations.

3.3.2 | Alignment with Measurable Objectives

(1) <u>Internet adoption</u>: Increase Minnesotans' adoption of broadband internet.
(2) <u>Devices</u>: Increase Minnesotans' access to large-screen devices.
(3) <u>Digital skills</u>: Expand Minnesotans' access to digital skills and cybersecurity training.
(4) <u>Accessibility</u>: Improve accessibility of web-based state, local, and tribal government information.

Strategy	Objective(s)	Covered Populations	Notes
A	1	All	N/A
B	2	All	N/A
C	1, 2, 3, 4	All	N/A

3.4 | Key Performance Indicators (KPIs)

The following table provides key performance indicators (KPIs) aligned with each of the four measurable objectives. While the KPIs presented here consider the entire statewide population, unique KPIs for each covered population are available in Appendix C and Appendix D.

Objective	Measurement	2023 Baseline	2028 Target[14]
Internet Adoption[15]	This is measured using ACS data describing the percentage of households subscribed to broadband internet service.	83.7%	94.3%

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[14] KPI percentages for 2028 were determined through a two-step process: (1) calculate the factor equivalent to 65% of the gap between 2023 measures and 100%, and then (2) add this factor to the 2023 baseline measure to arrive at the 2028 measure.

[15] Aligned with "the availability of, and affordability of access to, fixed and wireless broadband technology" as required in the NOFO.

Objective	Measurement	2023 Baseline	2028 Target[14]
Devices[16]	This is measured using ACS data describing the percentage of households that report having at least one laptop or desktop computer available.	82.1%	93.7%
Digital Skills[17]	This is measured using mapping data that describes the percentage of households located within a 60-minute round-trip drive or ride on public transit from the nearest public location (public library, community college, non-profit, CareerForce location, etc.) that provides free basic digital skills and cybersecurity support.	Pending[18]	Pending
Accessibility[19]	This is measured using an equally-weighted combination of three factors: (1) the percentage of county, city, and tribal government websites that meet the accessibility standards set forth in Minn. Stat. § 16E.03; (2) the percentage of county, city, and tribal government websites that reflect a Flesch Readability Score of 90 – 100; and (3) the percentage of county, city, and tribal government websites that provide translations of certain essential information in alignment with local linguistic diversity.	Pending	Pending

[16] Aligned with "the availability and affordability of consumer devices" as required in the NOFO.

[17] Aligned with "digital literacy" and "technical support for those devices" as required in the NOFO. Also aligned with "awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual" as required in the NOFO.

[18] This component, along with all other occurrences of "pending" in this table, will be determined during Phase 1 of implementation.

[19] Aligned with "the online accessibility and inclusivity of public resources and services" as required in the NOFO.

"When I first moved in, I Googled 'internet provider near me' and immediately got an affordable introductory offer. The price quickly went up and I was stuck with a bill I couldn't afford and unaware of my choices. I was overpaying for a rental router because I didn't understand how to buy and set up my own. I was overpaying for speed because I didn't know how to determine my needs. It would have been nice to have a hotline to call or website to access that could have helped me navigate without trying to sell me something." [20]

As previously articulated, this plan is an exploratory document coupled with programmatic goals that are achievable through a State Digital Equity Capacity Grant. However, numerous unknowns as of November 15, 2023 render this implementation section more aspirational than immediately practical.[21] Consequently, the implementation strategies, timelines, and partners as presented here require OBD to make the following assumptions:

(1) The Office of Broadband Development will be the state's administering entity of federal Digital Equity Capacity Grant funds.
(2) Minnesota's State Digital Equity Capacity Grant application and award will be approved by July 1, 2024. This is an estimate and will change as more information becomes available.
(3) Minnesota's State Digital Equity Capacity Grant award amount will be sufficient to initiate the activities proposed in Section 3.0.
(4) State and federal digital opportunity programs and policy will remain consistent.

4.1 | Strategy

Creation and support for the Digital Connection Committees exemplifies OBD's strategic efforts to embed opportunity in this very planning process itself. Building on this momentum, OBD aims to continue prioritizing authenticity, cooperation, and relationship-building while implementing this plan. OBD is the state entity responsible for administering Minnesota's federal Digital Equity Act funds, a position that comes with inherent power. In the face of digital opportunity work—that is, work that

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[20] Survey, Woodbury. Provided by South Washington County Telecommunications Commission (Digital Connection Committee).

[21] OBD does not yet know how much funding Minnesota will receive for its portion of the Digital Equity Act funds. The State Digital Equity Capacity Grant NOFO has not yet been made available. OBD will likely need to spend time following the submission of this plan in November (a) revising the plan based on NTIA comments, (b) preparing and submitting the State Digital Equity Capacity Grant application, and (c) revising the State Digital Equity Capacity Grant application in order to receive the funding award. A delay during any one of these steps will delay subsequent steps.

strives to create new opportunities in spaces where opportunity has been absent or obscured—it would be inappropriate for OBD to proceed without continuing to center people in this work. OBD has crafted an implementation strategy that builds off and strengthens these relationships:

Phase Name	State Fiscal Year (SFY)[22]	Description
Phase 1: Aligning	SFY2025	The first phase. Focus on convening and connecting with partners; additional information gathering; preparing RFPs for contracts; preparing RFPs and rolling out select capacity grant programs.
Phase 2: Accelerating	SFY2026	The second phase. Focus on publicizing information; research; rolling out additional capacity grant programs.
Phase 3: Amplifying	SFY2027	The third phase. Focus on scaling up activities; expanding and refining programs; updating public information.
Phase 4: Evolving	SFY2028	The final implementation phase. Focus on assessing all progress and future needs; concluding and/or transitioning grant projects; preparing for future.

4.2 | Timelines

4.2.1 | Connect People to People

Activity	ID[23]	Phase 1 Aligning SFY2025	Phase 2 Accelerating SFY2026	Phase 3 Amplifying SFY2027	Phase 4 Evolving SFY2028
Pilot Digital Opportunity Leaders Network	1.A.a	Q1: Complete RFP Q2: Execute contracts	OBD and regions provide technical	OBD and regions provide technical	OBD and regions provide technical

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[22] Implementation years are aligned with state fiscal years (SFYs), which start July 1 of the preceding year and end June 30 of the year named. For example, SFY2025 runs from July 1, 2024 to June 30, 2025. This is subject to change based on NTIA's timing of the State Digital Equity Capacity Grant award.

[23] This column is for OBD's internal use. It indicates the goal, strategy, and activity as outlined in Section 3.1.1.

EMPLOYMENT AND ECONOMIC DEVELOPMENT
OFFICE OF BROADBAND DEVELOPMENT

Minnesota's Digital Opportunity Plan

Activity	ID[23]	Phase 1 *Aligning* SFY2025	Phase 2 *Accelerating* SFY2026	Phase 3 *Amplifying* SFY2027	Phase 4 *Evolving* SFY2028
		Q3: Orient regional leads Q4: Flex time if needed	support, training, info to DCCs	support, training, info to DCCs	support, training, info to DCCs
Establish inter-agency digital opportunity workgroup	1.A.b	Q1: Form group Q2: Orient group to work Q3 and Q4: Meet quarterly	Q1 and Q2: Regular meetings Q3: Re-evaluate digital opportunity plan Q4: Revise plan based on analysis	Q1 and Q2: Regular meetings Q3: Re-evaluate digital opportunity plan Q4: Revise plan based on analysis	Q1 and Q2: Regular meetings Q3: Re-evaluate digital opportunity plan Q4: Revise plan based on analysis
Expand the DCC model	1.A.c	Q2: Re-evaluate plan with DCCs Q3: New DCC recruitment	Q2: Re-evaluate plan with DCCs Q3: New DCC recruitment	Q2: Re-evaluate plan with DCCs Q3: New DCC recruitment	Q2: Re-evaluate plan with DCCs Q3: New DCC recruitment
Retain existing DCCs through ongoing communication	1.A.d	Q1 – Q4: Virtual meetings bimonthly; monthly e-news	Q1 – Q4: Virtual meetings bimonthly; monthly e-news	Q1 – Q4: Virtual meetings bimonthly; monthly e-news	Q1 – Q4: Virtual meetings bimonthly; monthly e-news
Administer grants designed to support digital opportunity services	1.B.a 1.B.b	Q2: Complete RFPs Q3: Prepare app Q4: Design technical assistance plan	Q1: Launch round 1 Q2 and Q3: Monitor round 1 Q4: Conclude and evaluate round 1	Q1: Launch round 2 Q2 and Q3: Monitor round 2 Q4: Conclude and evaluate round 2	Q1: Launch round 3 Q2 and Q3: Monitor round 3 Q4: Conclude and evaluate round 3
Explore models for a statewide technology assistance helpline	1.B.c	N/A	Q2: Complete RFP Q3: Execute contract	Q1: Receive and revise report Q2: Publish report	N/A

Activity	ID[23]	Phase 1 Aligning SFY2025	Phase 2 Accelerating SFY2026	Phase 3 Amplifying SFY2027	Phase 4 Evolving SFY2028
			Q4: Begin research process	Q3: Update plan with findings	
Administer grants to support training students as paid tech repair technicians	1.C.a	N/A	Q1: Complete RFPs Q2: Prepare app Q3: Design technical assistance plan	Q1: Launch round 1 Q2 and Q3: Monitor round 1 Q4: Conclude and evaluate round 1	Q1: Launch round 2 Q2 and Q3: Monitor round 2 Q4: Conclude and evaluate round 2
Administer grants for small business and agriculture tech assessment	1.C.b	Q1: Complete RFPs Q2: Prepare app Q3: Design technical assistance plan	Q1: Launch round 1 Q2 and Q3: Monitor round 1 Q4: Conclude and evaluate round 1	Q1: Launch round 2 Q2 and Q3: Monitor round 2 Q4: Conclude and evaluate round 2	Q1: Launch round 3 Q2 and Q3: Monitor round 3 Q4: Conclude and evaluate round 3

4.2.2 | Connect People with Information

Activity	ID[24]	Phase 1 Aligning SFY2025	Phase 2 Accelerating SFY2026	Phase 3 Amplifying SFY2027	Phase 4 Evolving SFY2028
Add 1 FTE for digital opportunity data analyst position	2.A.a	Q1: Hire 1 FTE	Q1 – Q4: Maintain 1 FTE	Q1 – Q4: Maintain 1 FTE	Q1 – Q4: Maintain 1 FTE
Make MN digital opportunity data publicly available	2.A.b	Q2: Identify project scope Q3: Prepare draft	Q1 – Q4: Publish data	Q1 – Q4: Update data	Q1 – Q4: Update data

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[24] This column is for OBD's internal use. It indicates the goal, strategy, and activity as outlined in Section 3.2.1.

EMPLOYMENT AND ECONOMIC DEVELOPMENT
OFFICE OF BROADBAND DEVELOPMENT

Minnesota's Digital Opportunity Plan

Activity	ID[24]	Phase 1 *Aligning* SFY2025	Phase 2 *Accelerating* SFY2026	Phase 3 *Amplifying* SFY2027	Phase 4 *Evolving* SFY2028
		Q4: Revise draft			
Enhance data of baseline digital skills across covered populations	2.A.c	Q2: Complete RFP Q3: Execute contract Q4: Collect data	Q1: Incorporate new data in plan and public datasets	Q1 – Q4: Update data	Q1 – Q4: Update data
Create public directory of digital opportunity resources	2.A.d 2.B.b	Q2: Expand asset inventories from DCCs	Q2: Publish directory	Q2: Update directory	Q2: Update directory
Administer grants to support local digital opportunity planning	2.B.a	Q1: Complete RFPs Q2: Prepare app Q3: Design technical assistance plan	Q1: Launch round 1 Q2 and Q3: Monitor round 1 Q4: Conclude and evaluate round 1	Q1: Launch round 2 Q2 and Q3: Monitor round 2 Q4: Conclude and evaluate round 2	Q1: Launch round 3 Q2 and Q3: Monitor round 3 Q4: Conclude and evaluate round 3
Support digital opportunity planning cohorts	2.B.c	Q4: Execute contract	Q1: Launch round 1 Q2 and Q3: Monitor round 1 Q4: Conclude and evaluate round 1	Q1: Launch round 2 Q2 and Q3: Monitor round 2 Q4: Conclude and evaluate round 2	Q1: Launch round 3 Q2 and Q3: Monitor round 3 Q4: Conclude and evaluate round 3
Conduct city, county, tribal web accessibility evaluation	2.C.a	Q3: Complete RFP Q4: Execute contract	Q1: Receive report; publish report Q2: Update plan with findings	N/A	N/A

Activity	ID[24]	Phase 1 *Aligning* SFY2025	Phase 2 *Accelerating* SFY2026	Phase 3 *Amplifying* SFY2027	Phase 4 *Evolving* SFY2028
Administer grants to improve local website accessibility	2.C.b	N/A	Q2: Complete RFPs Q3: Prepare app Q4: Design technical assistance plan	Q1: Launch round 1 Q2 and Q3: Monitor round 1 Q4: Conclude and evaluate round 1	Q1: Launch round 2 Q2 and Q3: Monitor round 2 Q4: Conclude and evaluate round 2
Administer grants to PEG channels	2.C.c	Q1: Complete RFPs Q2: Prepare app Q3: Design technical assistance plan	Q1: Launch round 1 Q2 and Q3: Monitor round 1 Q4: Conclude and evaluate round 1	Q1: Launch round 2 Q2 and Q3: Monitor round 2 Q4: Conclude and evaluate round 2	Q1: Launch round 3 Q2 and Q3: Monitor round 3 Q4: Conclude and evaluate round 3

4.2.3 | Connect People to Resources

Activity	ID[25]	Phase 1 *Aligning* SFY2025	Phase 2 *Accelerating* SFY2026	Phase 3 *Amplifying* SFY2027	Phase 4 *Evolving* SFY2028
Add 1 FTE for ACP[26] coordinator position	3.A.a	Q2: Hire 1 FTE	Q1 – Q4: Maintain 1 FTE	Q1 – Q4: Maintain 1 FTE	Q1 – Q4: Maintain 1 FTE
Improve digital opportunity for residents of multi-dwelling units	3.A.b	Q3: Group formed, oriented to work	Q1 – Q4: Meet quarterly	Q1 – Q4: Meet quarterly	Q1 – Q4: Meet quarterly

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[25] This column is for OBD's internal use. It indicates the goal, strategy, and activity as outlined in Section 3.3.1.

[26] The future of ACP funding is currently unknown. While currently imagined as focusing on ACP, this position will ultimately be broader in scope to encompass Lifeline, additional internet service affordability programs, and research in the area of affordability.

Activity	ID[25]	Phase 1 *Aligning* SFY2025	Phase 2 *Accelerating* SFY2026	Phase 3 *Amplifying* SFY2027	Phase 4 *Evolving* SFY2028
		Q4: Meet quarterly			
Research models for a statewide program like ACP	3.A.c 3.B.a	Q1: Complete RFP Q2: Execute contract Q3: Receive report; publish report Q4: Update plan with findings	N/A	N/A	N/A
Research models for program supporting device access	3.B.b	Q3: Complete RFP Q4: Execute contract	Q1: Receive report; publish report Q2: Update plan with findings	N/A	N/A
Collaborate with DOC, MCEC to help people who are incarcerated and re-entering	3.C.a	Q1: Group formed, oriented to work Q2: Meet bimonthly through 2027	Q1 – Q4: Meet bimonthly	Q1 – Q4: Meet bimonthly	Q1 – Q4: Meet bimonthly
Collaborate with DEED Office of New Americans to help immigrants, refugees	3.C.b	Q1: Group formed, oriented to work Q2: Meet bimonthly through 2027	Q1 – Q4: Meet bimonthly	Q1 – Q4: Meet bimonthly	Q1 – Q4: Meet bimonthly

Activity	ID[25]	Phase 1 *Aligning* SFY2025	Phase 2 *Accelerating* SFY2026	Phase 3 *Amplifying* SFY2027	Phase 4 *Evolving* SFY2028
Collaborate with CareerForce to expand access to digital skills training	3.C.c	Q1: Group formed, oriented to work Q2: Meet bimonthly through 2027	Q1 – Q4: Meet bimonthly	Q1 – Q4: Meet bimonthly	Q1 – Q4: Meet bimonthly
Administer grants to organizations serving covered populations	3.C.d	Q1: Complete RFPs Q2: Prepare app Q3: Design technical assistance plan	Q1: Launch round 1 Q2 and Q3: Monitor round 1 Q4: Conclude and evaluate round 1	Q1: Launch round 2 Q2 and Q3: Monitor round 2 Q4: Conclude and evaluate round 2	Q1: Launch round 3 Q2 and Q3: Monitor round 3 Q4: Conclude and evaluate round 3

5.0 | The Current State of Digital Opportunity

"Whether we want to believe it or not, people are being left out. Sometimes, it is an oversight. But being from a small town with lower income families, it was hard for myself growing up to get the available technology then. It still is now." [27]

The Digital Equity Act requires a high-level statewide digital inclusion assessment as well as individual assessments of each of the following eight covered populations. These are groups of people who, due to systemic challenges, may face disproportionately low rates of digital inclusion when compared to the overall U.S. population. This list is copied verbatim from the State Digital Equity Planning Grant NOFO:

(1) Individuals who live in covered households;[28]
(2) Aging individuals;[29]
(3) Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;
(4) Veterans;[30]
(5) Individuals with disabilities;[31]
(6) Individuals with a language barrier, including individuals who
    a. Are English learners; and
    b. Have low levels of literacy;
(7) Individuals who are members of a racial or ethnic minority group; and
(8) Individuals who primarily reside in a rural area.[32]

Identity is complex and overlapping. While each of these covered populations is addressed separately in this plan, this separation is entirely artificial. It is very conceivable for any person to fit into more than

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[27] Survey, Faribault County. Provided by Traverse des Sioux Library Cooperative (Digital Connection Committee).

[28] "The term *covered household* means a household, the income of which for the most recently completed year is not more than 150 percent of an amount equal to the poverty level, as determined by using criteria of poverty established by the Bureau of the Census" (NOFO).

[29] "The term *aging individual* means an individual who is 60 years of age or older" (NOFO).

[30] "The term *veteran* means a person who served in the active military, naval, air, or space service, and who was discharged or released therefrom under conditions other than dishonorable" (NOFO).

[31] "The term *disability* means, with respect to an individual— 1. A physical or mental impairment that substantially limits one or more major life activities of such individual; 2. A record of such an impairment; or 3. Being regarded as having such an impairment" (NOFO).

[32] "The term *rural area* means any area other than: (1) A city or town that has a population of greater than 50,000 inhabitants; (2) Any urbanized area contiguous and adjacent to a city or town that has a population of greater than 50,000 inhabitants; and (3) In the case of a grant or direct loan, a city, town, or incorporated area that has a population of greater than 20,000 inhabitants" (NOFO).

one of these stated categories and/or to exist within and across different categories during different phases of their life. Moreover, no group of people is a monolith. Within each category are countless valid ways of living, knowing, and being.

With that, this section of the plan provides nine snapshots addressing statewide digital opportunity as well as within each of the eight covered populations. The focal points for each include the given group's existing digital strengths, their unsupported digital necessities, and systemic challenges they experience that impede their collective access to digital opportunity. OBD has chosen to use these phrases to supplement the terms provided in the Digital Equity Act bill text, which were "assets," "needs," and "barriers."

Digital Equity Act Term	OBD Term	Reason for Supplemental Language
Assets	Existing Strengths	"Assets" implies commodity or extrinsic worth. "Existing strengths" accounts for intrinsic value, including the value of people coming together to solve systemic problems.
Needs	Unsupported Necessities	"Needs" suggests a limited deficit with a fulfillment-based solution. "Unsupported necessities" highlights the enduring nature of inequity, the complexity of remediation, and the role of systemic supports in fostering sustainable change.
Barriers	Systemic Challenges	"Barriers" places the onus to overcome on the individual who has been digitally excluded, oftentimes outside of their own control. "Systemic challenges" acknowledges that public policy and system design underlie and reinforce many barriers.

The choice to supplement this language allows this plan to acknowledge Minnesotans' past and current digital resilience and resourcefulness while addressing how systemic changes can create a more equitable future.

5.1 | Statewide Snapshot

"I keep a list of things I need to do in town while I have access to good internet. I am always thinking about these types of things. It is just so exhausting." [33]

Minnesota's 2022 population was estimated at 5,801,769 residents living in 2,299,740 households.[34] At 86,943 square miles, Minnesota is the 12th largest state by area and ranks 36th for population density with 66.7 people per square mile. Its geography is shared with 11 federally recognized Native Nations, including seven Anishinaabe tribes and four Dakota tribes. Located in the upper Midwest, Minnesota is known for its water[35] and winters.[36]

Even as the Minnesota Model for broadband development has contributed to notable progress and holds a positive reputation nationally, statewide disparities persist relative to technology access, affordability, and digital skills. In this subsection, digital opportunity is considered on a statewide scale.

5.1.1 | Minnesota's Existing Digital Strengths

Technology Availability, Access, and Adoption

- **Minnesota is not new to broadband policy and deployment.**
  - **Universal broadband access has been a state goal since 2010.** This was three years before the Office of Broadband Development was established.[37] The current speed goals in statute are:

    (1) no later than 2022, all Minnesota businesses and homes have access to high-speed broadband that provides minimum download speeds of at least 25 megabits per second and minimum upload speeds of at least three megabits per second; and

    (2) no later than 2026, all Minnesota businesses and homes have access to at least one provider of broadband with download speeds of at least 100 megabits per second and upload speeds of at least 20 megabits per second.

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[33] Focus group, Winona area. Zephyr Valley Community Cooperative (Digital Connection Committee).
[34] MN State Demographic Center, "Latest annual estimates of Minnesota and its Economic Development Regions' population and households, 2022."
[35] MN Department of Natural Resources, "Lakes, Rivers, and Wetland Facts." The Land of 10,000 Lakes actually has 11,842 lakes over 10 acres in size, plus the first 680 miles of the Mississippi River and 68,520 miles of other rivers and streams.
[36] MN Department of Natural Resources, "Climate." In northern Minnesota, the average temperature in winter is 8 degrees Fahrenheit. This average increases to a balmy 18 degrees Fahrenheit for southern Minnesota.
[37] Minn. Stat. § 237.012.

- o **Since 2014, the state legislature has directed over $380 million toward broadband infrastructure grants.**[38] This includes $335 million over the lifetime of the Border-to-Border Broadband Grant Program, $30 million for the Low-Density Pilot Program, and $15 million for the Line Extension Program. These programs are most often supported with state general revenue funds with additional federal dollars through American Rescue Plan Act Sec. 604 Capital Projects Funds.
- o **Minnesota is pursuing Broadband Equity, Access, and Deployment (BEAD) Funds.** Announced on June 26, 2023, Minnesota's BEAD allocation is $651,839,368.20.[39] The state's Five-Year BEAD Action Plan was submitted to NTIA on July 12, 2023.
- o **Regional Library Telecommunications Aid (RLTA)[40] and Telecommunications/Internet Access Equity Aid (TEA)[41] help public libraries and K12 schools provide internet access.** These state programs offset internet costs for libraries and schools participating in the federal e-rate program. E-rate, overseen by the Federal Communications Commission, provides an annual discount of up to 90% of the cost of internet service. RLTA and TEA build on this support.
- o **The 2023 Minnesota legislature appropriated new funding for programs related to digital opportunity.** This includes:
  - ▪ $40 million for Minnesota IT Services (MNIT)'s Technology Modernization Fund to modernize, secure, and improve the customer experience of executive branch technology systems;[42]
  - ▪ Up to $30 million for the Lower Population Density Grant Program to award competitive broadband infrastructure grants using reduced match requirements for applicants serving areas with low population density;[43]
  - ▪ **$10 million to modernize digital tools supporting workforce development initiatives;[44] and**
  - ▪ School library aid equaling the greater of $16.11 times a district's adjusted pupil units or $40,000.[45] Among other things, this funding can be used for "information technology infrastructure and digital tools."
- • **Home internet subscription rates are slightly higher among Minnesotans than the national average.** Statewide, 91.6% of Minnesota households subscribe to any kind of internet service,

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[38] OBD, "2022 Annual Report."

[39] NTIA, "Biden-Harris Administration Announces State Allocations for $42.45 Billion High-Speed Internet Grant Program as Part of Investing in America Agenda."

[40] Minn. Stat. § 134.355.

[41] Minn. Stat. § 125B.26.

[42] Laws of Minnesota 2023, chapter 62, article 1, section 10.

[43] Laws of Minnesota 2023, chapter 43, article 3, section 4.

[44] Laws of Minnesota 2023, chapter 53, article 20, section 2, subdivision 4.

[45] Laws of Minnesota 2023, chapter 55, article 9, section 15.

including broadband (83.7%), satellite (8.5%), dial-up (2.9%), or a mobile data plan (90%). Nationally, this figure is 87%.[46]

- **Minnesota is home to several nationally-recognized computer refurbishers supporting device ownership for individuals from low-income households.** These include PCs for People, Repowered, and Minnesota Tech for Success.
- **Minnesota is a national leader in digital skills assessment.** Northstar Digital Literacy was developed in 2008 through a partnership between Saint Paul Public Library and Saint Paul Community Literacy Consortium. The platform moved to its current home at Literacy Minnesota in 2011 and is used nationwide by over 3,050 Adult Basic Education programs, colleges, nonprofits, workforce centers, government agencies, public libraries, and businesses.
- **Statewide, Minnesota has 356 public library locations.** In total, 355 of these libraries offer wifi and a combined total of 4,872 public computers and devices.[47] Annually, these locations are open a total of 641,419 hours.
    - o **In 2021, Minnesota's public libraries supported 1,236,941 internet sessions on their public computers**. Libraries also supported an additional 5,848,695 wireless internet sessions among people bringing their own devices.
    - o **Minitex, a state-funded library organization, champions Minnesotans' access to information statewide.** Minitex's resources and services include the extensive databases in eLibrary Minnesota, historical and cultural heritage materials through Minnesota Digital Library, and the AskMN 24/7 online reference service.

Advocates and Educators

- **State broadband and technology policy has been developed alongside experts.**
    - o **Minnesota statute provides protocols for maintaining government-to-government relationships between the State of Minnesota and the 11 federally recognized tribes sharing this geography.**[48] These legal requirements support informed decision-making by fostering communication on matters of mutual interest, including broadband access and digital opportunity.
    - o **The Governor's Task Force on Broadband provides cross-sector knowledge and perspective around digital opportunity.** First formed in 2008 and continuing with each gubernatorial term since, the role of the 15-member Task Force is to "advise the executive and legislative branches on broadband policy, including strategies for successfully achieving the state broadband goals, comprehensive assessment of digital inclusion issues and gaps, and strategies for unlocking the benefits of universal access to broadband for all communities in Minnesota."

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[46] American Community Survey (ACS) 5-Year Estimates, 2017–21.

[47] MN Department of Education, "2021 Minnesota Public Library Annual Report–Outlets."

[48] Minn. Stat. § 10.65.

- o **The Minnesota Cybersecurity Task Force contributes to the development of a statewide cybersecurity plan.** This plan will also be a component of Minnesota's application for the State and Local Cybersecurity Grant Program (SLCGP), a new grant program passed in the Bipartisan Infrastructure Law. Its overall goal is to advance cybersecurity protections for Minnesotans.
- o **The Minnesota Technology Advisory Council (TAC) advises MNIT and executive branch agencies on strategic information technology initiatives and service delivery.** Their 2022 annual report and recommendations leans into partnerships, relationship-building, and collaboration as it strives to improve cybersecurity measure and website accessibility.[49]
- o **University of Minnesota Extension is a reputable skill-developer statewide.** Extension is present in all 87 of Minnesota's counties and at least 6 Native Nations. Conversations between OBD and Extension staff indicate Extension is beginning to forge rural digital inclusion connections and is eager to expand services to further support digital opportunity.
- **Many philanthropic foundations in Minnesota are digital opportunity supporters.** Standouts include the Blandin Foundation and the Shavlik Family Foundation.
- **"Young people […] have an eye towards the future of technology."** As articulated by Smart North following listening sessions with young people in Minneapolis, "Many young people were interested in exploring technology in an artistic space that allowed them to explore industries like fashion, music, audio/visual spaces, and graphic design."[50]
- **"Digital navigator" models are becoming more common.** "Digital navigators" refer to individuals whose job is to support people in getting and sustaining internet access, acquiring devices, and developing digital skills.
  - o **"Digital navigators 'make a huge difference.'"[51]** This was observed by ConnectedMN during 2021 interviews of Black- and Indigenous-led organizations receiving digital inclusion project funds.
  - o **Multi-lingual digital navigators can provide trusted technology support in people's first languages.** Somali Community Resettlement Services in Faribault provides this.[52] Bilingual staff assist at three computer terminals where clients complete and check the status of online application forms.
  Rural and urban communities alike see potential in digital navigator roles. Upper Minnesota Valley Regional Development Commission serving Big Stone, Chippewa, Lac qui Parle, Swift, and Yellow Medicine Counties heard support for this idea during a focus group with region-wide representation: "Every community [could] have a support

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[49] MN IT Services, "2022 Report of the Technology Advisory Council."

[50] Focus group, Minneapolis. Provided by Smart North (Digital Connection Committee).

[51] Impact report finding. Provided by ConnectedMN (Digital Connection Committee).

[52] Individual interview, Faribault. Provided by Rice County (Digital Connection Committee).

location and community navigator … [This could be] one person per county that could move around from community to community and who would know local people."[53]

5.1.2 | Minnesota's Unsupported Digital Necessities

- **Broadband access in Minnesota is not yet universal.** As of October 2022, 92.07% of Minnesota housing units statewide are served by wireline broadband service at speeds of at least 25/3 Mbps.[54] The nearly 8% of households lacking access are located largely in the hardest-to-reach places.
  - **Household computer ownership in Minnesota is lower than household smartphone and tablet ownership.** While smartphones and tablets offer convenience, many essential activities require a large-screen device. Among all Minnesota households, 89.6% have smartphones and tablets compared to 82.1% with laptop or desktop computers. Nationally, an estimated 78.9% of households have a computer.
  - **Minnesota ranks last out of all states for its poor support for computer science courses in high schools.**[55] Nationally, 46% of high schools provide computer science courses. In Minnesota, this figure drops to 21%. Louisiana, ranking just above Minnesota in 49th place, has 32% of its high schools offer computer science courses.
- **Telehealth is a valuable but underutilized resource in communities of all types.** Hennepin Healthcare has piloted the Digital Equity Experts (DEX) service to address this. In 2022, DEX staff observed that 15% of patients reported no access to internet at home, 41% reported not having adequate internet access at home, and 44% reported not having adequate technology skills to meet their educational and/or employment goals.[56]
- **One-on-one technology assistance through community-based organizations is becoming more common, but funding is piecemeal overall.** Non-profit organizations are particularly vulnerable. Grants may be available to pilot a new digital opportunity program or service, but sustaining these services is a persistent puzzle.
- **Minnesota Department of Education no longer includes digital equity as one of its priorities for federal Library Services and Technology Act (LSTA) funding.** LSTA funding is the primary mechanism the state uses to advance public library services through its State Library Services division. The 2018-22 LSTA plan named "libraries facilitate digital equity and literacy" as one of its top-five priorities.[57] The 2023-27 plan does not include digital equity in its goals and mentions digital inclusion activities in two out of the plan's 39 proposed activities.[58]

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[53] Focus group, Region 6W. Provided by Upper Minnesota Valley Regional Development Commission (Digital Connection Committee).

[54] OBD, "2022 Annual Report."

[55] Code.org Advocacy Coalition, "2022 State of Computer Science Education: Minnesota."

[56] Survey, Minneapolis. Provided by Hennepin Healthcare (Digital Connection Committee).

[57] MN Department of Education, "Minnesota LSTA Five-Year Plan: 2018-2022."

[58] MN Department of Education, "Minnesota LSTA Five-Year Plan: 2023-2027."

- **Cyberbullying among Minnesota's students is persistent.** In 2013, 86% of 5th graders responding to the Minnesota Student Survey reported they were never cyberbullied, 2% reported they were cyberbullied one per week, and 1% reported daily cyberbullying.[59] In 2022, 76% of 5th graders reported they were never cyberbullied, 4% reported they were cyberbullied once per week, and 2% reported daily cyberbullying. These increases were greater among students identifying as female.

5.1.3 | Systemic Challenges Impeding Digital Opportunity in Minnesota

- **Winter is a beast.** Snow and frozen ground shorten the annual time available for broadband buildouts. Federal broadband infrastructure programs misaligned with Minnesota's abbreviated construction season may be impractical for larger projects.
- **Some communities report difficulties with the Border-to-Border Broadband Development Grant Program.** Although this program has made a remarkable difference in many Minnesotans' lives, it is not a one-size-fits-all opportunity.
  - **Some communities report feeling held back by the state's broadband speed goals.** A Digital Connection Committee encompassing Region 1 in northwest Minnesota named this early in their work:[60] As business and household broadband usage increases, communities that meet but do not greatly exceed state speed goals find themselves stuck. Their passable broadband speeds disqualify them from state and many federal programs for un– and underserved areas, yet higher speeds are needed and in demand locally. They also see limitations around affordability, recognizing that not all residents can afford service.
  - **Fluctuating state funds for the Border-to-Border Broadband Development Grant Program can create uncertainty among un– and underserved communities.** Some communities interested in partnering with an internet service provider to submit a Border-to-Border application report hesitancy because annual appropriations fluctuate.
- **Minnesota lacks statutory definitions for terms like "digital inclusion" and "digital opportunity."** This creates ambiguity around what the state does and does not consider to be digital opportunity work. Colorado[61] and Washington[62] are some examples of states that are integrating digital opportunity language into state law.
  - **Concepts relevant to digital opportunity are scattered throughout statute and session laws.** A fragmented approach to state-level digital opportunity investment creates fewer systemic, long-term positive changes than a centralized and intentional strategy.

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[59] MN Department of Education, "Minnesota Student Survey Reports: 2013-2022."

[60] Meeting minutes, Warroad participant. Provided by the Veden Center for Rural Development at UMN-Crookston (Digital Connection Committee).

[61] Colorado Department of Labor and Employment, "Digital Equity, Literacy, and Inclusion Initiative."

[62] Washington State Department of Commerce, "Digital Navigator Program."

- o **Minnesota statute lacks a mechanism to offset internet and device costs for low-income households.** The state program most similar to ACP is the Telephone Assistance Program (TAP). TAP does not cover internet service but provides a monthly credit of $10 for low-income households to receive landline telephone phone service.
- o **Adequate state support for digital opportunity is unlikely to be sustainable without statutory changes.** The current absence of digital opportunity language and funds in statute contribute to an approach that addresses digital opportunity on a case-by-case basis rather than systemically.

5.2 | People Living in Rural Areas

"If you remember during Covid when the kids were doing online school—the kids had to go to the bar in town and sit outside to get internet. That's how bad it is up here." [63]

Out of Minnesota's 5.8 million residents, 55.1% live in the Twin Cities metropolitan area, encompassing Shakopee Mdewakanton Sioux Community and Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington Counties.[64] Although this geographic area—commonly referred to as the Metro—is home to a larger number of Minnesotans, it represents only 3.5% of the state's land area. The rest of Minnesota's residents—44.9%, or nearly 2,605,000—live in the 96.5% of Minnesota's geography located outside of the Metro. This includes 80 counties and 10 Native Nations.

The Digital Equity Act's rural and urban designations do not map perfectly onto the Greater Minnesota and Metro geographic areas;[65] however, this plan chooses to use these familiar terms as they are rooted in geographic identity and lie at the crux of some of Minnesota's statewide tensions.

5.2.1 | Existing Digital Strengths in Rural Areas

Technology Availability, Adoption, and Use

- **State funding for broadband deployment is improving high-speed internet availability in rural Minnesota.** In February 2015, as early rounds of the Border-to-Border Broadband Grant program reached across Minnesota, 68.08% of rural Minnesota housing units had access to

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[63] Participant comment, townhall meeting, Big Falls (population: 175). Provided by Koochiching Technology Initiative (Digital Connection Committee).

[64] ACS 5-Year Estimates, 2017–21.

[65] See Appendix F for a complete list of "urbanized" Greater Minnesota cities and "rural" Metro cities per Digital Equity Act definitions.

wireline speeds at or above 25/3 Mbps, and 1/1 Gbps service reached only 5.81%.[66] As of October 2022, those figures rose to 74.42% and 36.04%, respectively. When looking beyond wireline service this 2022 figure rises to 94.31% of rural housing units being served at or above 25/3 Mbps.

- o **Technology access keeps rural Minnesotans connected socially and economically across geographically dispersed communities.** In a survey of 144 residents conducted by the Town of White, the most common uses of internet access were for socializing (88%), making purchases (90%), and paying bills (86%).[67]
- o **Vibrant communities of artists in Greater Minnesota can thrive with high-speed internet access.** In Mahnomen, for example, Gizhiigin Arts Incubator supports Anishinaabe artists by providing wifi access, computers for artists' use, high-quality art photography equipment, and virtual art shows.[68]
- **Counties and organizations in Greater Minnesota are developing new services to get internet-enabled devices in their residents' hands.** This includes KOOTASCA's Digital Divide Program and Lyon County's ResQ Zone.
- **Some youth living in Greater Minnesota are gaining access to computer science skills outside of school.** Out-of-school programs like Martin County KnowHow and Northland Hackathon bring young people together virtually and in-person to explore computer science. In July 2023, the Kandiyohi County Board approved a partnership with New Vision Foundation, which will provide young adult classes in Willmar on coding, software engineering, and digital literacy.

Advocates and Educators

- **Public libraries—and their knowledgeable staff—are essential.** In Greater Minnesota, 251 out of 252 public library facilities provide free wifi and a total of 2,463 public internet-enabled devices, including computers and tablets. Combined, these libraries are open 436,453 hours per year.[69] In many instances, public libraries are the only places in rural towns where public wifi is available.
- **University of Minnesota Extension is a reputable skill-developer in rural communities.** Extension is present in all 87 of Minnesota's counties and at least 6 Native Nations.
- **CareerForce has 43 of its 55 locations in Greater Minnesota.** These locations provide in-person and virtual services, including a variety of classes to develop career seekers' digital skills.

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[66] OBD, "Historical Estimate of Wireline Broadband Service Availability in the State of Minnesota (Rural Areas)."

[67] Provided by Town of White (Digital Connection Committee).

[68] Asset inventory, Mahnomen County. Provided by Headwaters Regional Development Commission (Digital Connection Committee).

[69] MN Department of Education, "2021 Minnesota Public Library Annual Report–Outlets."

- **Minnesota's 1,780 township governments give rural residents political power.** Combined, over 9,000 township officers provide grassroots governance to 922,013 Minnesotans.[70]
- [American Connection Corps](#) **(ACC) fellows embedded in rural communities tackle localized technology challenges.** In 2022, ACC had fellows in Duluth, Fergus Falls, International Falls, Martin County, and Waseca County. These fellows developed plans for municipal broadband expansion, secured grant funding to advance broadband deployment, and provided digital skills training to rural residents.

5.2.2 | Unsupported Digital Necessities in Rural Areas

- **Greater Minnesota residents are less likely to have a broadband subscription.** In the Metro counties, 91.5% of households have broadband subscriptions compared to 66.8% of households in Greater Minnesota.[71]
  - **Greater Minnesota households are also more likely to have only a mobile data plan than Metro households.** 12.2% of Greater Minnesota households versus 8.6% of Metro households have access to only a mobile data plan with no broadband subscription. Greater Minnesota residents are also more likely to depend on satellite internet service (8.5% versus 5% in the Metro).
  - **Rural residents frequently cite challenges with slow internet speeds and unreliable service.**
    - In a Pine County survey, 42% respondents who have internet access at home reported that their connection was too slow to do what they needed.[72]
    - In an Aitkin County survey, this figure was 51%.[73]
    - A Wright County survey found that 39% of respondents experienced "unreliable" or "very unreliable" home internet connections.[74]
    - In Kandiyohi County, 51.4% of survey respondents reported they were "sort of" satisfied with their internet speeds, and 21.9% expressed dissatisfaction.[75]
    - Farmers running their agricultural business across multiple buildings may have acceptable internet service to their house but still experience an "inability to connect to internet outside or in farm buildings (like the milking parlor) due to lousy cell service."[76]

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[70] MN Association of Townships, "[Townships 101](#)."

[71] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[72] Survey, Pine County. Provided by [Pine County](#) (Digital Connection Committee).

[73] Survey, Aitkin County. Provided by [Aitkin County](#) (Digital Connection Committee).

[74] Survey, Wright County. Provided by [Wright County](#) (Digital Connection Committee).

[75] Survey, Kandiyohi County. Provided by [City of Willmar and Kandiyohi County Economic Development Commission](#) (Digital Connection Committee).

[76] Survey, Waseca and Le Sueur Counties. Provided by [Waseca-Le Sueur Library System](#) (Digital Connection Committee).

- Rural public libraries see this too: "Just yesterday," write library staff on the Iron Range, "while trying to stream a movie for the kids in our community, the library experienced poor internet quality and had to end our planned programming early."[77]
    - **Satellite and fixed wireless internet service can be made less reliable by weather fluctuations.** These technologies are more prevalent in Greater Minnesota. Rain and snow are common issues. "In poor weather," writes a survey respondent from the City of Dennison, "the internet is unreliable. If I need to work from home these days, I end up using my personal hotspot on my phone to connect my laptop."[78]

- **A lower proportion of Greater Minnesota residents have enrolled in ACP.** As of July 10, 2023, Minnesota's largely urban 3rd, 4th, and 5th Congressional districts had enrollment rates of 23%–34% among eligible households. At the same time, Minnesota's rural 1st, 7th, and 8th districts had enrollment rates of 18%–25%.[79]

- **Households in Greater Minnesota are less likely to have a laptop or desktop computer at home.** In Greater Minnesota, 77.6% of households have a laptop or desktop compared to 86% of Metro households.[80] Additionally, Greater Minnesota households are more likely to have access to only a smartphone (8.2%) compared to Metro households (5%).

- **Residents of Greater Minnesota need to travel farther to use a public library and have fewer library open hours available.** [81] Metro library buildings are open an average of 1,971 hours per year. Greater Minnesota libraries are open an average of 1,746 hours per year. Additionally, the 3.5% of Minnesota's geography represented by the Metro has 104 public library facilities whereas the 96.5% of Minnesota's geography represented by Greater Minnesota has 252 public libraries. Fifteen counties in Greater Minnesota have only one public library location.

- **Rural residents are using telehealth services at a lower rate than urban residents.** A 2023 survey by the MN Department of Health found 82% of rural Minnesotans reported reliable enough internet access for video telehealth compared to 91% of Minnesotans in urban areas.[82]

- **Greater Minnesota public libraries have significantly fewer staff than their Metro counterparts.** In the 7-county Metro, each public library building is supported by an average of 9.88 FTE versus 3.86 FTE in Greater Minnesota libraries.[83] A library staff member in west-central

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[77] Individual interview, Eveleth. Provided by the public libraries of the Quad Cities in Eveleth, Gilbert, Mountain Iron, and Virginia (Digital Connection Committee).

[78] Survey, Dennison. Provided by City of Dennison (Digital Connection Committee).

[79] Institute for Local Service Reliance, "ACP Dashboard."

[80] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[81] MN Department of Education, "2021 Minnesota Public Library Annual Report–Outlets."

[82] MN Department of Health, "Study of Telehealth Expansion and Payment Parity: Preliminary Report to the Minnesota Legislature 2023."

[83] MN Department of Education, "2021 Minnesota Public Library Annual Report–Outlets."

Minnesota describes this challenge: "We do not have enough time to provide the help patrons need. Many people have never used a computer."[84]

5.2.3 | Systemic Challenges Impeding Digital Opportunity in Rural Areas

- **Greater Minnesota is more often un- or underserved by broadband compared to the Metro.** In the Metro, 98.2% of households have access to 25/3 Mbps compared to 85.3% of households in Greater Minnesota.[85] This divide widens at 100/20 Mbps, with 97.5% of Metro households versus 78.3% of Greater Minnesota households having access to this speed.
  - **Limited competition among rural internet service providers reduces consumers' options.** Out of 118 Minnesota cities that have only one fixed, non-mobile broadband provider, only two are located in the Metro.[86] Lack of competition can contribute to higher subscription costs.
  - **Computer and device repair services can be difficult to come by in rural areas.** For many rural communities, the nearest computer repair shop can be 40-plus miles away.
- **Financial wealth accumulates in the Metro.** In 2021, Greater Minnesota experienced a 10.6% poverty rate compared to 8.3% in the Metro.[87] The 2021 median household income statewide was $77,720. Median household incomes in all Metro counties except Ramsey County exceeded this figure, and Ramsey still ranked ahead of 66 Greater Minnesota counties.
- **The dominant narrative about Greater Minnesota sometimes leans into false stereotypes about rural life.** This narrative may wrongly paint Greater Minnesota as an exclusively idyllic weekend destination, a homogenous expanse of land, or a place stuck in the past. Greater Minnesota is none of these, nor is it a singular place. Greater Minnesota is thousands of places and millions of people each of whom deserve the option to bring technology into their daily lives.

5.3 | Modern Elders

"You got to think back when we were young … Telephones were haphazard. When I used to live on the Gunflint Trail, our phone was hanging on a tree outside. You had to crank it. And look what we've got today! And they say, 'Well, why don't you know how to do that?' Come on, give me a break! There's been a lot through here!" [88]

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84 Survey, west-central Minnesota. Provided by Viking Library System (Digital Connection Committee).

85 OBD, "Availability of Wireline Broadband Service by County."

86 OBD, "Broadband Providers by Incorporated City."

87 ACS 5-Year Estimates, 2017–21.

88 Focus group, Grand Portage Nation. Provided by Wilderness Health (Digital Connection Committee).

EMPLOYMENT AND ECONOMIC DEVELOPMENT
OFFICE OF BROADBAND DEVELOPMENT

Minnesota's Digital Opportunity Plan

About 24% of Minnesotans—1,348,000 people—are ages 60 and over.[89] This figure has been growing steadily since 2010 and is expected to increase an additional 40% by 2030.[90] During this same timeframe, Minnesota's population of adults ages 85 and greater is estimated to increase by 33%, from 113,083 residents in 2020 to 150,328 in 2030, exceeding 200,000 by 2040. This population growth among elders is already more numerous in Greater Minnesota than in the Metro; this trend will continue into the future. As of 2022, Greater Minnesota has 635,200 residents ages 60 and greater compared to 634,000 in the Metro.

Minnesota's modern elders are active and engaged members of their communities. In 2022, voter turnout among Minnesotans ages 65-plus was 83.8% compared to 56.1% of Minnesotans ages 25–24.[91] Annually, 39% of Minnesotans ages 65-plus spend time volunteering, and 18% are still part of the workforce.[92] The vast majority of modern elders in Minnesota—90%—live independently in their own residences.[93] Another 6% live with relatives or roommates, and 4% live in congregate care or assisted living facilities. Even with so many modern elders living independently, housing costs remain a significant challenge for many. Out of all Minnesotans ages 65 and greater, 31.3% are paying 30% or more of their income on housing.

Technology access is essential in ensuring Minnesota's modern elders can age with support, care, dignity, and independence. It also plays an important role in improving individual long-term quality of life outcomes.

5.3.1 | Existing Digital Strengths for Modern Elders

Technology Availability, Adoption, and Use

- **Broadband subscriptions are increasing among adults ages 60-plus.** In 2021, 79.6% of Minnesota adults ages 60 and greater had a home broadband subscription compared to 66.8% in 2015.[94]
  - o **Technology helps modern elders stay connected socially.** Social isolation worsens serious health conditions, such as increasing the risk of dementia by 50%.[95] A Digital Connection Committee member describes the role technology played in elevating her mother's spirits after she became confined to an assisted living facility: "So much of her

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[89] ACS 5-Year Estimates, 2017–21.

[90] MN Department of Human Services, "Aging Data Profiles."

[91] U.S. Census Bureau, Voting and Registration Supplement of the Current Population Survey, 2022.

[92] ASC 5-Year Estimates, 2017–21.

[93] MN Compass, "7 Things to Know about Minnesota's Older Adults."

[94] ACS, 2015 and 2021.

[95] U.S. Centers for Disease Control and Prevention, "Loneliness and Social Isolation Linked to Serious Health Conditions."

last days revolved around the connections to things she cared about via the iPad and iPhone. Without it, her last years would have been dramatically different, less connected, less joyful."[96]

- o **Modern elders can use technology to age more independently.** HealtheMed, a public benefit corporation, often hears from its patients ages 60-plus about how telehealth services and assistive technologies give them a new sense of freedom. One patient, a 67-year-old with chronic health challenges, describes the difference a smart glucometer made: "Before, I could never drive to Duluth to see my son because the trip would be too much on me, but now, I can see him. I take my glucometer with me, some water, and my peanut butter, and I'm set."[97]
- o **ACP can bring modern elders online.** A Digital Connection Committee led by African Community Senior Services noted about half of their clients were using the discount program. Due to their location in Comcast's service area, many clients were able to use ACP to receive the 100 Mbps Internet Essentials Plus service at no cost.[98]
- **Computer ownership is rising among adults ages 60-plus.** In 2021, 77.4% of Minnesota adults ages 60 and greater had a laptop or desktop computer compared to 56.2% in 2015.[99]

Advocates and Educators

- **Numerous elder-serving organizations in Minnesota have expanded their services to include technology access.** These include groups like African Community Senior Services, Gifts for Seniors, Mower County Seniors, Inc., and Senior Community Services.
  - o **AARP Minnesota is piloting new community technology outreach using Senior Planet.** Senior Planet is a program providing in-person and online classes to help modern elders use technology to enhance their quality of life.
  - o **Age-Friendly Minnesota actively identifies strategies and collaborators to improve modern elders' quality of life outcomes via access to technology.** Age-Friendly Minnesota's preliminary report to Governor Walz, issued in August 2020, recommended that the state "recognize and treat broadband as a basic need, including for older adults."[100] Age-Friendly Minnesota is in the process of preparing a Multi-Sector

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[96] Individual interview, Metro area. Provided by Gifts for Seniors (Digital Connection Committee).

[97] Individual interview, Hennepin County. Provided by HealtheMed (Digital Connection Committee).

[98] Report, Minneapolis. Provided by African Community Senior Services (Digital Connection Committee).

[99] ACS, 2015 and 2021.

[100] MN Department of Human Services, Age-Friendly Minnesota, "Recommendations the from Governor's Council for an Age-Friendly Minnesota." "Access to the internet," the report goes on to say, "is fundamental to principles of equity. As such, broadband service not only must be made available to all, it also must be affordable in the manner of other basic utilities. Older adults need reliable, affordable broadband access as urgently as other age groups. Broadband unlocks doors to information, telemedicine, opportunities to maintain social ties, and vital services such as transportation."

Blueprint that will map existing efforts to create an age-friendly Minnesota; build broad support for comprehensive planning across sectors; and engage with partners to advance legislative agenda items.

- **Adults ages 60-plus with disabilities—including late-onset disabilities like hearing or vision loss—can receive assistive technology services and support through several state agencies and offices.** These include State Services for the Blind at DEED; the Braille and Talking Book Library at MN Department of Education; the Deaf and Hard of Hearing Services Division at MN Department of Human Services; the System of Technology to Achieve Results (STAR) program at MN Department of Administration.

5.3.2 | Unsupported Digital Necessities for Modern Elders

- **Adults ages 60-plus adopt broadband at lower rates than adults under age 60.** The broadband adoption rate among Minnesotans ages 60 and greater is 79.6% compared to 84.7% of adults ages 18–59.[101]
  - **ACP enrollment rates are lowest among adults ages 65-plus.** Even as modern elders on fixed incomes may cite affordability as a reason for lacking home internet service, the Benton Foundation finds that ZIP codes with high proportions of adults ages 65 and greater correlate with some of the lowest ACP enrollment rates among eligible households.[102]
  - **Broadband access in senior living and assisted care facilities is far from universal.** Some facilities with aging infrastructure lack the necessary wiring to provide campus-wide wifi or high-speed internet service. Some facilities provide wifi but do not provide devices. Although they often go above and beyond, the majority of staff at these facilities are ultimately trained as healthcare workers, not as technology educators.
- **Modern elders are left behind adults ages 18–59 in rates of laptop and desktop computer ownership.** This figure is 77.4% among Minnesotans age 60-plus compared to 89.4% among Minnesotans ages 18–59.[103]
  - **Additionally, adults ages 60 and greater may also face barriers related to using outdated technology.** In one survey, 40.7% of modern elder respondents indicated that in the past six months, their "primary tech device was being so slow that [they] just gave up trying to use it."[104]
  - **Smartphone use is low among modern elders.** The eldest Minnesotans have the lowest smartphone adoption rates: 37% of people ages 75 and greater have a smartphone compared to 75.3% of people ages 60–75 and 94.1% of people ages 18–59.[105] Disparities

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[101] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[102] Benton Foundation, "Understanding Factors that Play a Role in ACP Enrollment."

[103] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[104] Survey, Rochester. Provided by Family Service Rochester (Digital Connection Committee).

[105] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

within the modern elder population are also seen in broadband subscription rates (77% of adults 75-plus versus 80.2% of adults ages 60–75) and computer ownership (60% of adults 75-plus versus 83.3% of adults ages 60–75).

- **Some modern elders report they do not know where to go for technology assistance or do not have the means to travel there.** This is especially true in rural communities where public libraries are more geographically dispersed.
    - **Challenges layer on top of one another.** One modern elder describes this difficulty of trying to problem-solve independently: "When I look for solutions online, the directions tell me to use specific features on the keyboard, but I don't always know which of the buttons they are referencing. Then I can't solve my problem."[106]
    - **Adults ages 60-plus may be left to navigate the telehealth learning curve on their own.** About half of healthcare providers responding to a survey by MN Department of Health observed "disparities in broadband access, digital literacy, and comfort with using technology … are particularly salient for patients with a lower socioeconomic status, elderly patients, and patients living in remote locations."[107]

5.3.3 | Systemic Challenges Impeding Digital Opportunity for Modern Elders

- **Modern elders frequently cite cybersecurity concerns as their reason for avoiding technology.** While personal preference can certainly play a role in determining which technologies a person brings into their home, this preference may be shaped by fear.
    - In one focus group with the Silver Sneakers senior exercise class, participants "expressed that lack of knowledge and training made them feel unsafe online. The lack of knowledge of how to protect themselves from scams and fraud limited their online presence."[108]
    - This sentiment was echoed in a Metro-area focus group discussing some of their technology challenges: "There are people who will hijack a corporate logo and send you an email acting like they're the company, but they're not. There are also a lot of confusing forms on the internet."[109]
- **Modern elders on fixed incomes may struggle to budget for technology access.** This is especially true for women ages 65-plus, who experience poverty at higher rates than same-aged men. Social security represents 90% of annual income for 19% of women age 65-plus versus about 12% of men in the same age group. [110] Almost half of women ages 65-plus use Social

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[106] Survey, Metro area. Provided by Senior Community Services (Digital Connection Committee).

[107] MN Department of Health, "Study of Telehealth Expansion and Payment Parity: Preliminary Report to the Minnesota Legislature 2023."

[108] Focus group, Hibbing. Provided by Hibbing Public Library (Digital Connection Committee).

[109] Focus group, Blaine. Provided by North Metro TV (Digital Connection Committee).

[110] ACS 5-Year Estimates, 2017–21.

Security for at least 50% of their income, compared to about a third of men. Among women who are modern elders, women of color are the most hard-hit by this economic disparity.

- **Services for modern elders are sometimes designed without guidance from modern elders.** This creates a scenario where needs and services are misaligned.
    - Sitting down with a group of modern elders at an assisted living facility, one Digital Connection Committee heard requests for "patience, personalized options, protection of personal information and finances, trustworthy information sources, and the establishment of boundaries for technology use."[111]
    - In interviews with 51 Chinese elders, 82.4% of whom speak limited English, English language skills and typing skills were the two biggest needs they identified.[112]
- **The dominant narrative on aging perpetuates harmful stereotypes about modern elders while reducing their perceived agency.** This narrative is one where modern elders exist primarily as the passive recipients of healthcare services and supports rather than as active, engaged community members. This messaging also tells modern elders that their technology skills will never be good enough. As one Digital Connection Committee observed during individuals interviews with 50 rural adults ages 65 and greater, "All lacked confidence and exhibited negative self-talk when asking for help."[113]

5.4 | People from Minoritized Racial and Ethnic Groups

"I rate my [digital] skills as pretty good, but there's a lot I don't know how to do for my job. I have panic attacks sometimes because I can't convert files and more advanced stuff. I don't want anyone at work to find out." [114]

The State Digital Equity Planning Grant NOFO uses the phrase "individuals from racial or ethnic minority groups" to name the collective lives of people who are African, Asian, Black, Indigenous, Hispanic or Latino, multi-racial, multi-ethnic, and more. With the understanding that these racial and ethnic groups represent the global majority, OBD is instead using the descriptor "people from minoritized racial and ethnic groups." "Minoritized" is a word chosen for its acknowledgement that racial inequities are perpetuated by systems of oppression. OBD also strives to be as specific as possible, as often as possible when addressing individual racial and ethnic groups throughout this subsection.

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[111] Focus group, Austin. Provided by Mower County Seniors, Inc. (Digital Connection Committee).

[112] Individual interviews, Metro area. Provided by Chinese American Chamber of Commerce (Digital Connection Committee).

[113] Individual interviews, Martin County. Provided by Project 1590 (Digital Connection Committee).

[114] Focus group, Metro area. Provided by Global Entrepreneurship Week MN (Digital Connection Committee).

Minnesota's residents include 1,279,000 people from minoritized racial and ethnic groups, representing 22.4% of the state's overall population.[115] Although the number of people from minoritized racial groups is higher in the Metro at 939,000, the population of minoritized racial groups in Greater Minnesota is increasing at a much faster rate. From 2000 to 2022, the number of people from minoritized racial groups in the Metro increased by 111%; during this same time frame, the number of people from minoritized racial groups in Greater Minnesota increased by 147%. Minnesota's most populous racial and ethnic groups include the following:

Race or Ethnicity	Population[116]
Asian: All	**288,400**
Asian: Burmese	15,300
Asian: Cambodian	8,500
Asian: Chinese	31,700
Asian: Filipino	12,000
Asian: Hmong	93,700
Asian: Indian	44,600
Asian: Korean	16,600
Asian: Vietnamese	27,100
Black: All	**387,800**
Black: Ethiopian	31,700
Black: Somali	68,800

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[115] MN State Demographic Center, "Our Estimates."
[116] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

Race or Ethnicity	Population[116]
Hispanic or Latino: All	**327,200**
Hispanic or Latino: Cuban	8,900
Hispanic or Latino: Ecuadorian	15,500
Hispanic or Latino: Guatemalan	11,600
Hispanic or Latino: Mexican	206,600
Hispanic or Latino: Puerto Rican	18,500
Hispanic or Latino: Salvadorian	15,000
Indigenous: All	**55,200**
Indigenous: Anishinaabe	31,700
Indigenous: Dakota	5,500
Other Minoritized Race or Ethnicity: Not Specified	**122,300**
Multi-Racial or Multi-Ethnic	**270,600**

5.4.1 | Existing Digital Strengths for People from Minoritized Racial and Ethnic Groups

Technology Availability, Adoption, and Use

- **Five of the 11 federally recognized tribes sharing the geography of Minnesota were recently awarded federal funding broadband infrastructure and use projects.**[117] Awards range from $500,000 to $19,800,704 and support five Native Nations: Bois Forte Band of Chippewa, Leech Lake Band of Ojibwe, Lower Sioux Indian Community, Mille Lacs Band of Ojibwe, and White Earth Nation.

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[117] For more details about these awards, see Section 6.2.2.

- o **The Fond du Lac Band of Lake Superior Chippewa's internet service provider—Aaniin—provides fiber-to-the-home across Fond du Lac Nation.** Their services incorporate ACP and Lifeline enrollment into the subscription processes to keep tribal customer costs low.
  - o **Four tribal colleges and tribal college libraries connect Indigenous students to culturally-grounded higher education.** All four colleges—Fond du Lac Tribal and Community College, Leech Lake Tribal College, Red Lake Nation College, and White Earth Tribal and Community College—provide on-campus computer access, high-speed internet service, and other high-quality essentials to their students. Bezhigoogahbow Library at Leech Lake Tribal College and Medweganoonind Library at Red Lake Nation College double as community libraries, allowing anyone to access their computer labs, books, and other materials.
- **Numerous Asian–, Black–, Hispanic–, and Indigenous-led organizations in Minnesota have expanded their services to include technology access.** Examples include 30,000 Feet, African Community Senior Services, CLUES, Leech Lake Boys and Girls Club, Migizi, New Vision Foundation, Project Nandi, and Roots Wellness Center.
- **The Black Broadband Summit and Family Broadband Coalition are Black-led initiatives focused on closing the digital divide in the Metro.** Their vision includes creating a community-owned internet cooperative to serve Minneapolis and Saint Paul neighborhoods.

Advocates and Educators

- **The 93rd Minnesota Legislature is the most racially and ethnically diverse in the state's history.** In the House, 23 out of 134 seats are held by leaders self-identifying as American Indian, Arab, biracial, Black, Hispanic or Latino Origin, Hmong, Japanese American, Ojibwe, Puerto Rican, and Somali-American.[118] In the Senate, 12 out of 67 seats are held by leaders self-identifying as American Indian, Black, Hmong, Hispanic or Latino Origin, and Somali-American.
- **The state ethnic councils are positioned to advise the state executive branch and legislature on digital opportunity issues affecting people from minoritized racial and ethnic groups.** These councils include the Council on Asian Pacific Minnesotans, the Council for Minnesotans of African Heritage, the Minnesota Council on Latino Affairs, and the Minnesota Indian Affairs Council.
- **An increasing number of Minnesotans from minoritized racial and ethnic groups are earning postsecondary certifications and degrees.** From 2015 to 2022, post-secondary certification and degree attainment among people ages 25–44 increased by 5.2% for Black people, 9% for Hispanic or Latino people, and 8.1% for Indigenous people.[119]

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[118] MN Legislative Reference Library, "Self-Reported Minority Legislators."

[119] MN Office of Higher Education, "Educational Attainment Goal 2025."

5.4.2 | Unsupported Digital Necessities for People from Minoritized Racial and Ethnic Groups

- **Broadband subscriptions are less frequent among most people from minoritized racial and ethnic groups.** Rates are 85.4% for Asian Minnesotans, 75.3% for Black Minnesotans, 77.4% for Hispanic or Latino Minnesotans, 70.9% for Indigenous Minnesotans, 85.1% for multi-racial or multi-ethnic Minnesotans, and 68.6% for Minnesotans of an unspecified minoritized race.[120] White Minnesotans subscribe to home broadband services at a rate of 85.2% statewide.
  - **People from minoritized racial and ethnic groups are more often limited to mobile data only with no home broadband subscription.** 9.7% of White Minnesotans have access to only mobile data. This figure is higher for Minnesotans who are Black (22.3%), Hispanic or Latino (19.4%), Indigenous (22%), and Minnesotans of an unspecified minoritized race (27.1%).[121]
    - In a survey by Asian Media Access, 20.3% of respondents indicated they rely on mobile internet, and another 18.1% expressed that they were not sure whether their home internet use was considered mobile.[122]
    - A similar survey of Black and African Minnesotans by Beyond Media Solutions found 22.4% of respondents relied of mobile internet with an additional 13.4% unsure whether they were using mobile or non-mobile service.[123]
  - **People from minoritized racial and ethnic groups are more likely to lose internet service for days at a time.** A survey conducted by Global Entrepreneurship Week MN found Asian, Black, Indigenous, and Latino respondents were more likely than White respondents to lose internet service for 3 or more days at a time.[124] Asian respondents were the hardest hit with 57% experiencing this. While falling behind on payments is a commonly assumed reason for this, Global Entrepreneurship Week's Hmong interviewers heard from Hmong survey respondents that families whose bills were paid lost service because they were unable to get the technical support they needed from providers. This is likely due to language barriers, cultural barriers, and racial aggressions.
- **Rates of laptop and desktop computer ownership are lower for most people from minoritized racial and ethnic groups.** 90.2% of Asian Minnesotans, 75.8% of Black Minnesotans, 74.8% of Hispanic or Latino Minnesotans, 66% of Indigenous Minnesotans, 85.2% of multi-racial or multi-ethnic Minnesotans, and 65.3% of Minnesotans of an unspecified minoritized race have access

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[120] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[121] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[122] Survey, Metro area. Provided by Asian Media Access (Digital Connection Committee).

[123] Survey, Metro area. Provided by Beyond Media Solutions (Digital Connection Committee).

[124] Survey, Minneapolis and Saint Paul. Provided by Global Entrepreneurship Week MN (Digital Connection Committee).

to a laptop or desktop computer at home.[125] White Minnesotans have access to a laptop or desktop computer at a rate of 89.3% statewide.

- o **People from minoritized racial and ethnic groups are more often limited to only a smartphone.** 5% of White Minnesotans have access to only a smartphone. This figure is much higher for Minnesotans who are Black (18.5%), Hispanic or Latino (21.7%), Indigenous (21.5%), multi-racial or multi-ethnic (11.5%), and Minnesotans of an unspecified minoritized race (31.5%).[126] Smartphone-only rates are slightly elevated for Asian Minnesotans as a whole at 6.9%.
- o **"A smartphone isn't enough to do everything I want online."** 70% of people participating in a Ramsey County community survey agreed with this statement.[127] This survey also noted that 49% of respondents identifying as Black, Indigenous, and People of Color felt they always have the technology they need compared to 64% of respondents identifying as White.
- **Small businesses owned by people from minoritized racial and ethnic groups also experience these technology disparities.** In conversations with Black businessowners in Saint Paul's Frogtown and Rondo neighborhoods, Aurora/St. Anthony Neighborhood Development Corporation found 48% of the businesses contacted had websites, 38% had in-store technology access for staff, and none had in-store technology access for customers.[128]
- **Within each major race and ethnicity are even more complex variations in digital opportunities and disparities.** The table included below attempts to capture this:[129]

Race/Ethnicity	Broadband Subscription	Mobile Data Only	Laptop/Desktop Ownership	Smartphone Ownership	Smartphone Only
Asian: All	**85.4%**	**8.4%**	**90.2%**	**95.0%**	**6.9%**
Asian: Burmese	51.0%	32.8%	78.9%	91.8%	20.8%
Asian: Cambodian	80.6%	7.9%	85.0%	92.6%	7.4%
Asian: Chinese	90.1%	2.9%	90.6%	91.6%	2.1%
Asian: Filipino	90.7%	6.4%	98.1%	97.9%	1.4%
Asian: Hmong	84.7%	8.4%	90.1%	96.9%	8.8%

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[125] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[126] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[127] Survey, Ramsey County. Provided by the Ramsey County and Saint Paul Connectivity Blueprint Steering Committee (Digital Connection Committee).

[128] Individual interviews, Saint Paul. Provided by Aurora/St. Anthony Neighborhood Development Corporation (Digital Connection Committee).

[129] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

Race/Ethnicity	Broadband Subscription	Mobile Data Only	Laptop/Desktop Ownership	Smartphone Ownership	Smartphone Only
Asian: Indian	93.8%	1.3%	96.7%	99.4%	2.6%
Asian: Korean	84.6%	9.5%	94.9%	95.4%	2.6%
Asian: Vietnamese	87.7%	10.3%	88.8%	90.7%	8.4%
Black: All	**75.3%**	**22.3%**	**75.8%**	**92.2%**	**18.5%**
Black: Ethiopian	74.5%	25.5%	89.2%	92.3%	6.3%
Black: Somali	56.8%	24.7%	68.9%	92.3%	25.4%
Hispanic or Latino: All	**77.4%**	**19.4%**	**74.8%**	**94.1%**	**21.7%**
Hispanic or Latino: Cuban	81.4%	5.4%	68.7%	88.2%	21.7%
Hispanic or Latino: Ecuadorian	66.2%	18.5%	66.1%	97.0%	26.8%
Hispanic or Latino: Guatemalan	59.8%	10.0%	66.1%	95.6%	29.4%
Hispanic or Latino: Mexican	66.6%	20.3%	72.6%	91.6%	21.7%
Hispanic or Latino: Puerto Rican	74.9%	10.1%	82.3%	84.5%	5.9%
Hispanic or Latino: Salvadorian	42.8%	30.9%	63.4%	80.3%	35.6%
Indigenous: All	**70.9%**	**22.0%**	**65.9%**	**82.2%**	**21.5%**
Indigenous: Anishinaabe	68.1%	24.1%	62.6%	79.3%	21.7%
Indigenous: Dakota	83.3%	11.5%	75.3%	86.5%	18.9%
Other Minoritized Race or Ethnicity: Not Specified	**68.6%**	**27.1%**	**65.3%**	**94.3%**	**31.5%**
Multi-Racial or Multi-Ethnic	**85.1%**	**11.1%**	**85.2%**	**94.6%**	**11.5%**
Minoritized Race or Ethnicity: All[130]	**78.5%**	**17.4%**	**78.4%**	**93.3%**	**17.2%**
White: All	**85.2%**	**9.7%**	**89.3%**	**87.1%**	**5.0%**

- **Educators in Minnesota are overwhelmingly White.** According to the Minnesota Department of Education, 94.1% of Minnesota's K12 classroom teachers are White while 36.7% of Minnesota's K12 students are Asian, Black, Hispanic or Latino, Indigenous, multi-racial, or multi-ethnic.[131]

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[130] Including people of Hispanic or Latino origin.

[131] MN Department of Education, "Equitable Access to Excellent and Diverse Educators."

When instructors of digital skills come from a different cultural background than their students, additional work needs to be done to ensure implicit bias doesn't hinder student learning.

- **City and county government employees in administrative positions are less likely to be from minoritized racial and ethnic groups.** White people represent 90.1% of administrative staff across Minnesota's city and county governments; Asian people represent 1.9%, Black people represent 5%, Hispanic and Latino people represent 1.6%, Indigenous people represent 0.5%, and multi-racial people represent 0.8%.[132] When city and county government administrative staff are determining how to support digital opportunity, they are less likely to have the lived experience of the people who may need these services most.

5.4.3 | Systemic Challenges Impeding Digital Opportunity for People from Minoritized Racial and Ethnic Groups

- **People from minoritized racial and ethnic groups are more likely to experience poverty.** The State Digital Equity Planning Grant NOFO identifies 150% of the federal poverty level as being low-income. This level of poverty affects 21.6% of Asian Minnesotans, 41.4% of Black Minnesotans, 31% of Hispanic and Latino Minnesotans, 49.3% of Indigenous Minnesotans, 23.8% of multi-racial and multi-ethnic Minnesotans, and 30.6% of Minnesotans of an unspecified minoritized race. In comparison, 14.1% of White Minnesotans experience this level of poverty.[133]
  - o **Disparities in credit access and credit scores follow racial lines.** A 2022 study by the Minneapolis Federal Reserve Bank found that Metro ZIP codes with high proportions of Asian, Black, Latino, and Indigenous residents had lower median credit scores than Metro ZIP codes with high proportions of White residents, even after adjusting for disparities in household income.[134] A poor or non-existent credit history can cause residents to need to pre-pay for internet service.
  - o **Financial precarity contributes to housing instability.** Irregular relocation, annual lease expirations, and migrant ways of living make it challenging for households to sustain a subscription to broadband internet service. In responses to the 2017-21 American Community Surveys, 11.7% of White Minnesotans reported changing residences within the past 12 months. This figure was elevated for Asian Minnesotans (21.1%), Black Minnesotans (23.9%), Hispanic or Latino Minnesotans (21.7%), Indigenous Minnesotans (17%), multi-racial and multi-ethnic Minnesotans (22.8%), and Minnesotans of an unspecified minoritized race (22.8%).[135]

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[132] U.S. Equal Employment Opportunity Commission, "Job Patterns for Minorities and Women in State and Local Government."

[133] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[134] Minneapolis Federal Reserve Bank, "Twin Cities Neighborhoods with Higher Shares of Residents of Color Have Less Access to Credit."

[135] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

- **Owners of multi-dwelling units hold significant power over their tenants' and residents' choices for internet providers.** Some property owners invest in modern wiring between units, public computing spaces, and ACP outreach efforts. Other property owners let wiring fall into disrepair and can limit their residents' choice of provider significantly. People from minoritized racial and ethnic groups are more likely to be renters than White people.[136] In Minnesota, 19.5% of White Minnesotans are renters. This rate increases to 69.5% for Black Minnesotans, 50.9% of Indigenous Minnesotans, 34.6% of Asian Minnesotans, 62.4% of Minnesotans of an unspecified minoritized race, 41.8% of multi-racial and multi-ethnic Minnesotans, and 50.8% of Hispanic or Latino Minnesotans.

5.5 | Veterans

Veteran, age 70: "We're on a fixed income. I would like to pick up some remote work but can't because we don't have the internet." [137]

According to 2021 American Community Survey data, Minnesota has 265,920 veterans, representing 6.1% of the civilian population ages 18 and over. The vast majority of Minnesota's veterans are male with just 7.4% being female. Additionally, veterans' ages skew greater than the state's average with 56.9% of all veterans being ages 65-plus. For comparison, 19.6% of the state's non-veteran population is 65-plus. Because modern elders were directly addressed in Section 5.3 of this plan, this section strives to focus on veterans as veterans rather than veterans as a subset of modern elders.

Another striking difference between veteran and non-veteran Minnesotans is the rate of disability experienced by each group. In 2021, 29.1% of veterans had at least one disability versus 12.7% of non-veterans. For many veterans, these disabilities are a direct result of their military service. For this reason, disability has been incorporated intentionally into this section even as it will be expanded on in Section 5.6.

5.5.1 | Existing Digital Strengths for Veterans

Technology Availability, Adoption, and Use

- **Veterans subscribe to broadband at comparative rates.** In Minnesota, 81.5% of veteran households subscribe to broadband service compared to 83.6% of non-veteran households.[138]

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[136] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[137] Focus group, Winona area. Provided by Zephyr Valley Community Cooperative (Digital Connection Committee).

[138] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

- o **Veterans and military families receiving Veterans and Survivor Pension Benefits are eligible for ACP.** As of June 1, 2023, 544,950 households have enrolled in ACP nationally using this eligibility criterion.[139]
  - o **Five veterans homes operated by the state provide wifi to their residents.** These homes are located in Fergus Falls, Hastings, Luverne, Minneapolis, and Silver Bay. Three additional homes are under construction in Bemidji, Montevideo, and Preston.[140] Veterans experiencing homelessness who are in transitional housing at Upper Post also receive access to wifi and a computer lab.
- **For veterans seeking education and career skills the Minnesota GI Bill now includes expanded benefits.** Chapter 38 of the Veterans Omnibus Bill, signed into law during the 2023 state legislative session, increased annual tuition reimbursements and lifetime education benefits. Veterans pursuing post-secondary education, apprenticeships, and on-the-job training can also use these state funds to offset costs related to licensing, certification, and professional exams. As Minnesota looks to fill critical gaps in its technology workforce, veterans are well positioned to receive targeted career training.
- **The Minnesota Veterans Application Tracking System (VATS) simplifies the process of applying for benefits and filing claims.** Until June 2019, the MN Department of Veteran Affairs relied on paper applications forms, tracked applications in spreadsheets, and verified payments manually. Misplaced records and typos had the potential to upend veterans' customer service experiences. VATS is accessible from a large-screen computer or mobile device and allows veterans to check the status of any applications in real-time. Technical assistance is available over the phone or through LinkVet live chat.

Advocates and Educators

- **The U.S. Department of Veterans Affairs supports veterans in receiving telehealth services.** Through the Digital Divide Consult process, a VA social worker can determine whether a veteran is eligible for programs that support the technology access needed for VA telehealth. Services include tablet lending, ACP enrollment, and basic digital skills instruction.
- **The MN Association of County Veteran Service Officers advocates for veterans' needs in all 87 counties; Tribal Veteran Service Officers do the same work with the 11 Native Nations.** These service officers are veterans themselves, living and working in the same communities as their veteran clients. These commonalities establish trusting relationships as veterans work with service officers to navigate state and federal benefits, programs, and services.
- **Veterans with disabilities can receive assistive technology services and support through several state agencies and offices.** These include State Services for the Blind at DEED; the Braille and Talking Book Library at MN Department of Education; the Deaf and Hard of Hearing Services

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[139] Universal Service Administrative Company, "ACP Enrollment and Claims Tracker."
[140] MN Department of Veterans Affairs, "Veterans Homes."

Division at MN Department of Human Services; the System of Technology to Achieve Results (STAR) program at MN Department of Administration. Veterans with disabilities can also access assistive technology support through Disabled American Veterans of Minnesota.

5.5.2 | Unsupported Digital Necessities for Veterans

- **Veterans own smartphones and laptops or desktops at lower rates than non-veterans.** While 87.3% of non-veteran Minnesota households had a smartphone, this figure drops to 72.1% among veteran households.[141] Likewise, Minnesota veteran households have a home laptop or desktop at a rate of 81% compared to 86.5% of non-veteran households.
    - **While online applications for benefits streamline the process for many veterans, those lacking a device, reliable internet access, or digital skills are left behind.** In some cases, veterans' quality of life is directly harmed by access-related delays in receiving and managing benefits.
    - **The VA's expanded telehealth services and electronic medical records require specific digital skills.** Veterans, whose average age in Minnesota is 65 years old, may not have the prior experience needed to figure this out without assistance.[142]
- **Veterans returning from service may need upskilling or reskilling to find careers.** A recent study by the National Skills Coalition found that 91% of Minnesota job postings required at least one "likely digital" skill, and 48% required at least one "definitely digital" skill.[143]
- **Veterans are more likely to need trauma-informed customer service.** Nationally, more than 414,000 veterans live with the lingering effects of traumatic brain injuries sustained during service.[144] TBIs can cause memory loss, slowed thinking, and irritability, all of which could impede navigating the process of setting up or troubleshooting internet access or technology use.
- **Veterans may feel misunderstood by healthcare workers and other service providers, especially in Greater Minnesota.** A 2017 study by the Amherst H. Wilder Foundation found that 55% of veterans in Greater Minnesota believed there were no good services in their area for veteran-specific issues.[145] In the Metro, this figure was 15%.

5.5.3 | Systemic Challenges Impeding Digital Opportunity for Veterans

- **Veterans on fixed incomes may struggle to budget for technology access.** Cost of living adjustments (COLAs) to disabled and retired veterans' monthly federal payments have not kept

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[141] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[142] ACS 5-Year Estimates, 2017–21.

[143] National Skills Coalition, "Closing the Digital Skills Divide."

[144] U.S. Department of Veterans Affairs, "Traumatic Brain Injuries."

[145] Amherst H. Wilder Foundation, "Minnesota Veterans Behavioral Health Needs Assessment."

up with inflation rates. From 2010 to 2021, annual COLAs ranged from 0% to 3.6% with an average of 1.38%. COLAs in 2022 and 2023 increased 5.9% and 8.7%, respectively.[146]

- **Military service leaves invisible wounds that are not always met with care, patience, and respect.** Rates of mental illness (47%), chemical dependency (29%), suicidal ideation (35%), and suicide attempts (9%) are routinely higher among veterans than non-veterans. In the Amherst H. Wilder Foundation's 2017 study, Minnesota veterans who reported a strong sense of belonging in their communities were significantly less likely to report behavioral and mental health diagnoses.[147] While digital opportunity alone cannot create a sense of belonging, it can help catalyze and strengthen the social connections needed to heal.

5.6 | People with Disabilities

"I'm disabled and homebound. This is my only link to the world. I need a more affordable and faster connection and also tech help. I can't fix my own tech. I'm 60 and just don't know how." [148]

Approximately 649,000 Minnesotan, or 11.5%, live with at least one disability.[149] The American Community Survey 5-Year Estimates for 2017–21 identify cognitive difficulties (5.2%), independent living difficulties (5.1%), and ambulatory difficulties (4.9%) as the three most commonly occurring types of disabilities in Minnesota with hearing difficulties (3.9%), self-care difficulties (2.1%), and vision difficulties (1.6%) following behind.

Rates of disability increase steadily with age: 9.6% of Minnesotans ages 18–64 have disabilities compared to 28.6% of Minnesotans ages 65-plus.[150] Indigenous Minnesotans experience the highest rates of disability, affecting 17.4% of American Indian and Alaska Native individuals. This rate is striking when compared to rates of disability among non-Hispanic White Minnesotans (11.8%), Black and African Minnesotans (11.9%), Asian Minnesotans (7.7%), and Hispanic Minnesotans (9.2%). Even as disability affects individuals from all demographic backgrounds in all corners of the state, it coincides with, contributes to, and accumulates alongside other social vulnerabilities.

Whether a disability be physical, developmental, sensory, behavioral, or a combination, it is essential to acknowledge that every individual's experience living with disabilities is wholly unique. Disability exists on a continuum for Minnesotans as a whole and for individuals within the course of their lifetimes.

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[146] U.S. Department of Veterans Affairs, "Compensation Rates."

[147] Amherst H. Wilder Foundation, "Minnesota Veterans Behavioral Health Needs Assessment."

[148] Survey, Metro area. Provided by CCX Media (Digital Connection Committee).

[149] ACS 5-Year Estimates, 2017–21.

[150] ACS 5-Year Estimates, 2017–21.

Access to technology cannot erase disability, but when implemented with care and strategy, it can be a critical tool for people with disabilities.

5.6.1 | Existing Digital Strengths for People with Disabilities

Technology Availability, Adoption, and Use

- **Broadband subscriptions are increasing among people with disabilities.** A 2022 study by the U.S. Department of Labor found a 17% increase nationally in home internet subscriptions among people with disabilities from 2015–2019 compared to a 9.5% increase among people without disabilities.[151]
  - **People with disabilities receiving Supplemental Social Security Income are eligible for ACP.** As of June 1, 2023, 4,353,798 households nationally have enrolled in ACP nationally using this eligibility criterion.[152]
  - **Telehealth services, digital security systems, and web-based delivery services can help people with disabilities live more independently.** This was described by a disabled senior interviewed by a Digital Connection Committee. As summarized, this person "relies on access for everything from keeping up with friends and family, to having her daily needs delivered to her home. While she lives in the Metro, she has many friends who live in outstate Minnesota, and she really wants a solution for them to get quality broadband service."[153]
- **Technology helps people with disabilities stay connected socially.** For people with disabilities who are less ambulatory, lack reliable transportation, or have vulnerable immune systems, technology like Zoom and social media allows socializing that is safe and within their control.

Advocates and Educators

- **Numerous organizations in Minnesota serving people with disabilities have expanded to include technology access.** These include organizations receiving grant funds from a December 2022 technology grant program administered by MN Department of Human Services: Access North Center for Independent Living of Northeastern Minnesota in Hibbing; Accord in Saint Paul; Independent Lifestyles–A Center for Independent Living in Sauk Rapids; Kang Le in Eden Prairie; Lighthouse Center for Vital Living in Duluth; LiveLife Therapy Solutions in Bloomington; Roots Wellness Center in Saint Paul; and Wright County Community Action in Maple Lake.[154]

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[151] U.S. Department of Labor and Industry. "Disability and the Digital Divide."

[152] Universal Service Administrative Company, "ACP Enrollment and Claims Tracker."

[153] Individual interview, Falcon Heights. Provided by NineNorth (Digital Connection Committee).

[154] MN Department of Human Services, "Technology Grants to Benefit Older Adults and People with Disabilities in Minnesota."

- **Several state agencies and offices provide assistive technologies and technical assistance for people with disabilities.** These include State Services for the Blind at DEED; Vocational Rehabilitation Services at DEED; the Braille and Talking Book Library at MN Department of Education; the Deaf and Hard of Hearing Services Division at MN Department of Human Services; and the System of Technology to Achieve Results (STAR) program at MN Department of Administration. The Disability Hub is a free statewide service connecting people with disabilities to comprehensive supports, including assistive technology.
- **Staff at the Centers for Independent Living (CILs) provide comprehensive services to people with disabilities.** Across eight CILs, over 6,200 Minnesotans were served in 2022. Southwest Center for Independent Living learned through client surveys that smartphones and tablets were the most commonly used devices at 88.5% and 86.3%, respectively.[155]

5.6.2 | Unsupported Digital Necessities for People with Disabilities

- **People with disabilities are less likely to have a broadband subscription.** In Minnesota, 79% of people with disabilities have access to a home broadband subscription compared to 83.7% of all Minnesota households.
  - **Remote work options can give people with disabilities the flexibility they need to lead fulfilling careers, but only if they have adequate broadband at home.** Similarly, caregivers of people with disabilities can use home internet access to balance caregiving responsibilities with remote employment. A caregiver in Greater Minnesota describes this balance: "My husband is chronically sick, and our daughter is home to help care for him but can't work with our slow internet. Her job requires high speed internet."[156]
  - **People with disabilities are less likely to have access to computers and smartphones.** A 2021 study by the Pew Research Center found 62% of people with disabilities had access to a computer and 72% had access to a smartphone. For people without disabilities, these figures were 81% and 88%, respectively.[157] Census data from Minnesota show the same pattern: 69.8% of Minnesotans with disabilities have a laptop or desktop computer, and 67.8% of Minnesotans with disabilities have a smartphone.[158]
  - **People with two or more disabilities experience even greater rates of digital exclusion.** For example, in Minnesota, adults with one disability own laptops and desktops at a rate of 73.6%; this figure drops to 65.5% among Minnesota adults with two or more

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[155] Survey, Marshall. Provided by Southwest Center for Independent Living (Digital Connection Committee).

[156] Survey, Todd County. Provided by Todd County Broadband Coalition (Digital Connection Committee).

[157] Pew Research Center, "Americans With Disabilities Less Likely Than Those Without to Own Some Digital Devices."

[158] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

disabilities.[159] Similarly, 72.9% of Minnesotans with one disability own smartphones compared to 62.1% of Minnesota adults with multiple disabilities.

- **Government website compliance with accessibility standards is lacking.** While state law requires state agencies to comply with federal accessibility standards, their adherence is ultimately imperfect. Local and tribal governments may lack the funds to make necessary changes. The Minnesota Council on Disability provides resources and training to improve web accessibility.
- **Public libraries, especially those in Greater Minnesota, may not be fully accessible or have assistive technologies available to patrons.** Out of the 12 public library administrative entities in the Metro, 11 reported having building accessibility plans in place. These plans were last revised between 1991–2021 with 2008 being the average year that revisions most recently occurred. In Greater Minnesota, 75 out of 122 public library administrative entities had building accessibility plans. The average year of revision was 2006.[160]
- **Organizations serving people with disabilities often cite short-staffing as significant limiter in their work.** In 2022, Minnesota had 16,052 job vacancies for healthcare support occupations and 4,807 vacancies in community and social service occupations.[161]

5.6.3 | Systemic Challenges Impeding Digital Opportunity for People with Disabilities

- **Accessible design is sometimes framed as an option rather than the necessity it is.** Baseline compliance is not enough to ensure a website is truly accessible. As more assistance programs, healthcare services, education opportunities, and social networks move online, web accessibility—which has always been essential—becomes more and more critical.
- **People with disabilities are more likely to be on fixed incomes and/or experiencing poverty.** In 2021, 23.2% of Minnesotans with disabilities were living below poverty. This is more than double the statewide poverty rate.[162]
  - **For people with disabilities who work, lower median earnings make it challenging to afford costs for assistive technologies and internet service.** From 2016–2020, median annual earnings for all Minnesota workers without disabilities was $41,459. During the same time frame, median annual earnings for all Minnesota workers with disabilities was almost half at just $22,803. Within this group, men with disabilities earned a median income of $26,553 compared to $19,612 for women with disabilities.[163]

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[159] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[160] MN Department of Education, "2021 Minnesota Public Library Annual Report–Administrative Entities."

[161] DEED, Job Vacancy Survey.

[162] ACS 5-Year Estimates, 2017–21.

[163] U.S. Department of Labor, "Median Annual Earnings Map."

- o **Adults with disabilities may be unable to work full-time.** In 2021, 49.6% of Minnesota adults with disabilities were working.[164]

5.7 | People Who are Incarcerated or Re-Entering Society

Survey Question: "Describe one important aspect of your life that would be different if you had full access to affordable, reliable, fast internet; a tech device with the right applications and software; and all of the necessary tech skills."

Re-Entering Respondent: "My life would be better, and I could feel like a whole person and not someone who is less than others around me." [165]

As of January 1, 2023, 8,152 adults were being held in Minnesota's 11 state correctional facilities.[166] An additional 745 people were civilly committed in two state Sex Offender Program facilities,[167] approximately 8,000 people were detained across 82 county jails,[168] 2,285 people were in four federal prisons, and 19,975 people were under state supervision.[169] At the direction of the State Digital Equity Planning Grant NOFO, this section focuses on people held at non-federal facilities and will also address people on probation and re-entering.

Although Minnesota has one of the lowest imprisonment rates in the country at 140 people incarcerated per 100,000 state residents, this population is still significant.[170] A statewide prison and jail population over 8,000 outpaces the populations of 86% of Minnesota's cities.[171] Racial disparities and inequities contribute to Black and Indigenous Minnesotans becoming disproportionately justice-involved. On January 1, 2023, 36.8% of people incarcerated in state prisons were Black, yet Black Minnesotans represent 7.6% of the overall state population.[172] Similarly, Indigenous people represented 9.4% of people incarcerated in state prisons but 1.4% of the overall state population.

People who are incarcerated must essentially put their technology skills on hold during their detainment. A person serving a 15-year sentence, if released today, may have never meaningfully used any of today's most common technologies, such as smartphones, tablets, and mobile data. They may never have browsed YouTube, navigated social media, or completed online applications and paperwork.

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[164] ACS 5-Year Estimates, 2017–21.

[165] Survey, Metro area. Provided by Repowered (Digital Connection Committee).

[166] MN Department of Corrections, "Inmate Profile as of 01/01/23."

[167] MN Department of Human Services, "Sex Offender Treatment."

[168] National Institute of Corrections, "State Statistics: Minnesota 2020."

[169] MN Department of Corrections, "2022 Performance Report."

[170] U.S. Department of Justice, "Prisoners in 2021–Statistical Tables."

[171] MN State Demographic Center, "Our Estimates."

[172] MN Department of Corrections, "Inmate Profile as of 01/01/23."

Technology evolves quickly. Cybersecurity threats can change from unimaginable to personal in an instant. Missing out for any length of time puts a person at an immediate disadvantage, which can be especially harmful when that person is trying to restart their life. Within the scope of this plan, and given Minnesota's large probation population, the short-term path forward must address digital opportunity proximal to the re-entry process, referring to the transition from prison to society.

5.7.1 | Existing Digital Strengths Among People Who are Incarcerated or Re-Entering Society

Technology Availability, Adoption, and Use

- **The state Omnibus Judiciary and Public Safety bill, signed into law at the end of the 2023 legislative session, includes language improving prisoner access to technology.**[173] Effective July 1, 2023, people in Minnesota prisons can make phone calls at no cost. Video calls may also become an option at some facilities.
- **County jails are exploring digital options to help incarcerated parents stay connected to their children.**[174] Statewide in 2022, 13% of Minnesota's eighth, ninth, and eleventh graders reported having had an incarcerated parent or guardian. This figure was exceptionally high in Greater Minnesota where nearly one out of every five teens is impacted by parental incarceration. The Minnesota Model Jail Practices Learning Community, an effort co-facilitated by the MN Department of Health and the University of Minnesota, has focused on improving the wellbeing of these children and their incarcerated parents by facilitating more than 3,500 video visits during its pilot phase.
- **The Minnesota Career Education Center (MCEC) provides Adult Basic Education (ABE) services at nine state prison locations.**[175] Programs have classroom computers to allow students access to online software programs. Additionally, learners have access to high-quality academic and legal research databases.
  - **The MN Department of Corrections provides tablets for all incarcerated students**. In partnership, MCEC ensures effective ABE content is available on these tablets to

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[173] Laws of Minnesota 2023, chapter 52, article 11, section 11. "Free communication services. (a) A state adult or juvenile facility under the control of the commissioner of corrections must provide incarcerated persons with voice communication services. A facility may supplement voice communication services with other communication services, including but not limited to video communication and email or electronic messaging services. A facility must at least continue to offer the services the facility offered as of January 1, 2023. (b) To the extent that voice communication services are provided, which must not be limited beyond program participation and routine facility policies and procedures, neither the individual initiating the communication nor the individual receiving the communication must be charged for the service."

[174] MN Department of Health, "Minnesota Model Jail Practices Learning Community."

[175] MN Department of Corrections, "Minnesota Career Education Center ABE Consortium Narrative, 2023."

enhance distance learning and hybrid learning options. Tablets also provide access to a curated library of reentry and rehabilitation resources.

- **MCEC makes assistive technologies available to students.[176]** This includes screen readers, large-print keyboards, talking calculators, adaptive computer mice, teacher voice amplifiers, and closed captioning.

Advocates and Educators

- **State-supported partnering organizations connect people who are incarcerated and re-entering with digital skills training.** Data from MN Department of Corrections found educational attainment while incarcerated was associated with a 59% increase in post-release employment.[177]
  - **College and vocational instructors provide training for information technology careers.** This includes Metropolitan State University's College in Prison program, Minneapolis College's College-in-Prison program, and Minnesota State University Mankato's Scholars Serving Time Program.
  - **CareerForce provides tailored services for justice-involved individuals.** This includes digital skills development relevant to job search processes, digital skills training in the use of common workplace technologies, and the New Leaf program, a workshop designed to support the unique needs of job-seekers with criminal records.
  - **ABE instructors teaching through MCEC provide digital skills instruction.** In FY22, 4,123 incarcerated people were served by MCEC ABE. While many of these students are working toward GEDs, digital skills assessment and training is also available using Northstar Digital Literacy. Students passing Northstar's modules can earn a certificate that demonstrates their digital abilities to future employers.
- **Organizations like Repowered support people who are re-entering in gaining work experience while developing technology skills.** In 2022, Repowered saw 56 people hired through its work readiness program. They also had 40 digital literacy graduates and 31 work readiness employees who passed the National Association of Information Destruction certification test, an important credential in technology refurbishment.

5.7.2 | Unsupported Digital Necessities for People Who are Incarcerated or Re-Entering Society

- **Fewer re-entering individuals have access to home internet compared with the general population.** In a survey of re-entering individuals conducted by Repowered, 65.3% of

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[176] MN Department of Corrections, "Minnesota Career Education Center ABE Consortium Narrative, 2023."

[177] MN Department of Corrections, "The Effects of Minnesota Prison-Based Educational Programming on Recidivism and Employment."

respondents stated they had internet access at their residence.[178] Moreover, people living in transitional housing reported frequent issues with time limits, restrictions around internet use, and slow speeds during times where more residents are online.

- o **Re-entering individuals are less likely to have access to an internet-enabled device.** Smartphones were the most common device with 62.5% of Repowered survey respondents indicating they had access to one. Laptop computers were a distant second at 42.2%.
- o **After time away from technology, incarcerated and re-entering individuals are more likely to have limited digital skills.** A quarter of Repowered survey respondents indicated they had missed at least one important deadline within the past six months because of limited digital skills.
- **Imperfect content filtering software sometimes blocks access to important information.** One Repowered survey respondent described this challenge: "I have tracking software that prevented me from researching the companies I was applying to because much of their info led to LinkedIn or other sites that I was not allowed use."
- **Student to teacher ratios in MCEC ABE learning classrooms are imbalanced.** In the 2023 MCEC annual report, MN Department of Corrections outlined a staff of 43 licensed ABE teachers.[179] With 2,706 students enrolled at the time of this report, this creates an average ratio of 63 students for every ABE teacher. Facilities like Willow River, which has just one teacher, reported a ratio of 112 students per teacher. Although 10 licensed substitute teachers and 19 ABE support staff are also available, these ratios are still too high.

5.7.3 | Systemic Challenges Impeding Digital Opportunity for People Who are Incarcerated or Re-Entering Society

- **Poverty disproportionately affects people who have been incarcerated and their families who may have been dependent on their income prior to incarceration.** A 2022 study authored by the U.S. Census Bureau observed that people released from prison in 2006 had average annual incomes of $8,065 in 2007 and $10,090 in 2018. Their equally educated peers who had not been in prison had incomes of $16,020 in 2007 and $19,610 in 2018.[180]
  - o **People who are incarcerated often have lower levels of educational attainment.** On January 1, 2023, 55.6% of Minnesotans in state prisons had completed high school or a

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[178] Survey, Metro area. Provided by Repowered (Digital Connection Committee).

[179] MN Department of Corrections, "Minnesota Career Education Center ABE Consortium Narrative, 2023."

[180] U.S. Census Bureau, "Dim Outlook for People Released from Prison."

GED, and 18.2% had complete a four-year degree or higher.[181] Statewide, these figures are 93.6% and 37.6%, respectively.[182]

- o **Rates of unemployment are high among formerly incarcerated people.** A longitudinal 2021 study by the U.S. Bureau of Justice Statistics found 33% of people released from federal prisons in 2010 did not find employment at any point during the subsequent four years.[183] Two-thirds of this study population were 25–44 years old at the time of their released, and 82% had been in prison under 5 years at the time of their release. Affording to access technology consistently is difficult without a steady source of income; likewise, finding and sustaining a job is difficult without access to technology.

- **Imprisonment is dehumanizing and traumatic.** People who have been incarcerated experience lower rates of recidivism when they have comprehensive access to mental healthcare, educational opportunities, and career training during their prison sentence and following their release. All of these are made more possible and more accessible through full access to technology.

5.8 | People Experiencing Language Barriers

"The longer we are disconnected, that we can't take opportunities or do certain jobs, the more difficult is to catch up. Things are changing fast. We feel we are going to be left behind." [184]

As specified in the State Digital Equity Planning Grant NOFO, this covered population is twofold, referring to people who do not speak English fluently and people who lack English literacy. While these groups overlap, neither is perfectly inclusive of the other. As such, this section of Minnesota's digital opportunity plan strives to address both groups side-by-side, acknowledging commonalities without losing sight of differences.

English Fluency: According to the American Community Survey, 12% of Minnesotans ages 5 and over speak a language other than English at home.[185] Minnesotans who communicate using American Sign Language at home are included in this count. Among this 12% of the state's population speaking a language other than English at home, 62.4% can speak English "very well," and 37.6% speak English "less than very well." Statewide, this equates to 239,624 Minnesotans ages 5 and over, or 4.5% of

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[181] MN Department of Corrections, "Inmate Profile as of 01/01/23."

[182] ACS 5-Year Estimates, 2017–21.

[183] Bureau of Justice Statistics, "Special Report: Employment of Persons Released from Federal Prison in 2010."

[184] Focus group, Metro area. Provided by Hispanic Advocacy and Community Empowerment through Research (HACER) (Digital Connection Committee).

[185] ACS 5-Year Estimates, 2017–21.

Minnesotans ages 5 and over, speaking English "less than very well." Among people who speak English less than very well, 23.8% are 5-17 years old, 40.1% are 18-64 years old, and 53.5% are ages 65 and greater.

Statewide, the most common languages spoken at home other than English are Spanish (which is spoken in 31.5% of the households that speak other languages), Somali (11.7%), and Hmong (10.9%). While linguistic diversity is more numerous in the Metro, a density of linguistic diversity accumulates in some Greater Minnesota cities. A snapshot of this diversity is seen in this selection from the 2021-2022 primary home language totals across school districts compiled by the MN Department of Education:[186]

School District	County	Top 3 Home Languages	
Worthington Public Schools	Nobles	Spanish	35.79% of students
		Karen	3.55% of students
		Lao	1.41% of students
St. James Public Schools	Watonwan	Spanish	21.14% of students
		Quichua	0.95% of students
		Mam	0.74% of students
Willmar Public Schools	Kandiyohi	Spanish	17.26% of students
		Somali	11.31% of students
		Karen	2.22% of students
Austin Public Schools	Mower	Spanish	15.16% of students
		Karen	5.8% of students
		Anuak	1.32% of students
Albert Lea Public Schools	Freeborn	Spanish	7.72% of students
		Karen	7.45% of students
		Nuer	1.08% of students
All public schools in Hennepin County	Hennepin	Spanish	6.2% of students
		Somali	3.3% of students
		Hmong	2.33% of students
All public schools in Ramsey County	Ramsey	Spanish	6.2% of students
		Somali	3.3% of students
		Hmong	2.32% of students

English Literacy: The Program for the International Assessment of Adult Competencies (PIAAC), also known as the Survey of Adult Skills, is a large-scale international study collecting data from adults ages

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[186] MN Department of Education, "2021-22 Primary Home Language."

16-74 in the United States and ages 16-65 in the other countries. PIAAC data can provide a comparative way to assess English literacy levels across counties, state, and countries.

PIAAC results are reported as averages on a 500-point scale. Nationwide, the current PIAAC average is 264.[187] Minnesota's statewide score is 279, tying it with New Hampshire for the highest English literacy rate out of all 50 states. Minnesota counties scoring above the state average are Carver (290), Washington (287), Hennepin (285), Scott (285), Olmsted (284), Dakota (284), Sherburne (282), Cook, (282), Wright (281), Douglas (280), and Clay (280). The five lowest scoring counties were Clearwater (262), Pine (261), Mahnomen (257), Watonwan (253), and Nobles (250).

Setting up a broadband subscription and navigating the internet can be a challenge even for those who are fluent speakers and readers of English. Translation and plain language, while practical and necessary, are not blanket solutions on their own. These strategies require additional supports, often in the form of human connections and trust.

5.8.1 | Existing Digital Strengths for People Experiencing Language Barriers

Technology Availability, Adoption, and Use

- **Minnesota's most linguistically diverse communities are often located in areas with broadband access.** The majority of people whose primary home language is something other than English live in cities that are served by broadband at speeds of 25/3 or greater.
  - **Households primarily speaking a language other than English are more likely to be digitally connected if K12 students reside there.** South Central Service Cooperative based in Mankato observed that 26 out of 27 of their member schools "allow students to keep their devices or have checkout programs for students to take devices home or to events."[188] During interviews with PACER Center's multi-cultural advocates for children with disabilities, Hmong, Somali, and Spanish advocates noted that children often bring essential devices home from school.[189]
  - **People can use technology to develop their English skills throughout their daily lives.** Thai Cultural Council found that about 60% of their survey respondents and interviewees were using internet access, smartphones, and apps to support English language learning in real-time.[190]

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[187] U.S. Department of Education, "PIAAC."

[188] Focus group, southcentral Minnesota. Provided by South Central Service Cooperative (Digital Connection Committee).

[189] Individual interviews. Provided by MN Department of Education (Digital Connection Committee) in collaboration with PACER Center.

[190] Individual interviews and survey, Metro area. Provided by Thai Cultural Council (Digital Connection Committee).

- o **Technology is essential in helping immigrants and refugees stay connected to family, friends, and culture.** One English language student describes what it feels like when they are unable to reach an internet connection: "Without the internet I feel like I live in a prison because you lost your connection with your family."[191]
- **ACP resources are available in many languages.** Through the FCC's ACP outreach toolkit, this includes American Sign Language videos and written Arabic, Chinese (simplified and traditional), French, Haitian-Creole, Korean, Portuguese, Russian, Spanish, Tagalog, and Vietnamese. Hennepin County has independently created additional promotional flyers in Hmong, Somali, and Spanish.

Advocates and Educators

- **Public libraries are a frequent place people with limited English fluency and/or limited English literacy go to get internet access.** This is especially true among Metro residents.
    - o A survey by Oromo Community of Minnesota found 52.8% of respondents named the library as the place they go when they can't access the internet at home.[192]
    - o The library was named by 74.2% of respondents to a similar survey by Twin Cities West Metro Asian Fair.[193]
- **Numerous organizations serving people experiencing language barriers have expanded to include technology access.**
    - o This includes groups like African Community Senior Services, Austin Aspires, CLUES, Haven Housing, Intercultural Mutual Assistance Association, Literacy Minnesota, Roots Wellness Center, Project FINE, the Sanneh Foundation, and the South Sudanese Foundation.
    - o **MN Adult Basic Education (ABE) specializes in providing support for people building English fluency and/or English literacy skills.** Funded using a combination of federal and state resources, services are offered to over 65,000 adult students through a network of 39 consortia with over 300 sites total, comprising public school districts, nonprofit organizations, community and technical colleges, and correctional facilities.

5.8.2 | Unsupported Digital Necessities for People Experiencing Language Barriers

- **People with limited English fluency and/or limited English literacy have a broadband subscription at levels lower than average.** Language barriers correlate with low levels of formal education. In November 2021, 66.5% of people without high school diplomas and 71.3% of

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[191] Focus group, Metro area. Provided by International Institute of Minnesota (Digital Connection Committee).

[192] Survey, Metro area. Provided by Oromo Community of Minnesota (Digital Connection Committee).

[193] Survey, Metro area. Provided by Twin Cities West Metro Asian Fair (Digital Connection Committee).

people completing high school had a broadband subscription access.[194] This compares to 85.6% of college graduates.

- **In Faribault, a survey conducted in English, Somali, and Spanish found stark gaps between these three groups.** Lack of home internet access was reported by 12.2% of English speakers, 29% of Spanish speakers, and 78% of Somali speakers.[195]

- **People with limited English fluency and/or limited English literacy are less likely to have a computer at home.** During focus groups of English language learners at Riverland Community College, 29 out of 30 students indicated they had home internet access, but only eight had laptop or desktop computers (and two of those computers were reportedly not in working order).[196]

- **Technology classes focused on internet safety are in demand among adults with limited English fluency.** In a survey of Somali-speaking parents, 9 out of 10 respondents indicated that computer classes would be the most helpful technology resource that the Digital Equity Act could provide.[197]

  - **Online privacy and safety are major concerns among immigrants with limited English fluency.** In a Chinese/English bilingual survey where 85.2% of respondents indicated English was not their native language, 78.4% of respondents expressed concern about privacy and safety of online platforms.[198]

  - **Parents who are unfamiliar with technology due to language barriers express major concerns regarding their children's safe use of technology.** During a focus group with Somali mothers, GMCC learned that "because [parents] are unfamiliar with technology generally, they are unsure how to manage the time their children spend on their devices. Parents overwhelmingly expressed fear that overuse of digital technology put a strain on their relationships with their children."[199]

- **Internet service providers may not be prepared to provide customer service in a language not widely spoken in the U.S.** For people with limited English fluency, this can be an extremely frustrating if not altogether dehumanizing experience if not handled with patience and care.

- **In households where the primary language is not English, it is common for children to take on responsibilities assisting their parents with technology.** In conducting a focus group with Spanish-speaking parents, Raíces Latinas noted, "It is very evident that kids know much more about technology than parents do. There's a clear digital divide between what parents have

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[194] NTIA, "Digital Nation Data Explorer."

[195] Survey, Faribault and Northfield. Provided by Northfield Healthy Community Initiative (Digital Connection Committee).

[196] Focus group, Austin. Provided by Austin Aspires (Digital Connection Committee).

[197] Survey, Metro area. Provided by AG Consulting Media (Digital Connection Committee).

[198] Survey, Metro area. Provided by Chinese Community Center (Digital Connection Committee).

[199] Focus group, Metro area. Provided by GMCC (Digital Connection Committee).

access to compared to their children."[200] While intergenerational technology support is common in most households to some extent, English-speaking children whose parents are English learners may feel the weight of this responsibility more significantly than households where English is spoken fluently.

5.8.3 | Systemic Challenges Impeding Digital Opportunity for People Experiencing Language Barriers

- **Minnesota residents born outside the U.S. are more likely to live below 150% of the poverty level.** Among Minnesota-born residents, 14.6% were living in poverty compared to 23.6% of residents who were born outside of the U.S.[201] This can make it challenging to afford internet access.
- **Jargon is still jargon after it's translated.** Additional resources are needed to ensure understanding. That goes for the idea of "digital opportunity" itself. One Digital Connection Committee noted that none of the following terms resonated with their Latino focus group participants: digital literacy (alfabetización digital), digital inclusion (inclusión digital), and digital equity (equidad digital).[202]
- **Limited English fluency and literacy are significant vulnerabilities**. In a focus group held by Roots Wellness Center, staff heard concerns that "due to a language barrier, participants ended up hiring more costly services and added services they did not want."[203] One participant explained, "This does not happen when you call to get your electricity connected as electricity is treated as a commodity."
  - o **People new to the U.S. might be coming from a country where technology was restricted or unavailable.** In a survey of intermediate English language learners, one expanded on this newness in response to a question about challenges they have experienced while trying to get internet access, stating it is difficult to "choose a good speed and understand what tools are needed for this and the process itself. Understanding wifi devices. What wire do I need?"[204]
  - o **People living with language barriers—especially parents whose tech-savvy children are online—are on high alert for scams and worry about online safety.** People have experienced cybersecurity threats or who have close friends or family who have been harmed by scams may be keenly distrustful of low-cost programs that seem "too good

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[200] Focus group, Metro area. Provided by Raíces Latinas (Digital Connection Committee).

[201] ACS 5-Year Estimates, 2017–21.

[202] Focus group, Metro area. Provided by Hispanic Advocacy and Community Empowerment through Research (HACER) (Digital Connection Committee).

[203] Focus group, Minneapolis. Provided by Roots Wellness Center (Digital Connection Committee).

[204] Survey, Minneapolis. Provided by Literacy Minnesota (Digital Connection Committee).

to be true." Trusting relationships are the best way to impart the knowledge a person needs in order to navigate technology with confidence.

5.9 | People in Low-Income Households

"I am a single mom with unstable child support and cannot afford the internet options available to me at this time. I get a hotspot from the library. I can only keep it for so long and then have to return it and jump back on the wait list." [205]

The State Digital Equity Planning Grant NOFO establishes that low-income households are those where "the income of which for the most recently completed year is not more than 150 percent of an amount equal to the poverty level."[206] Statewide, 15.6% of all Minnesotans (about 904,800 people) are below 150% of the poverty level.[207] This group overlaps significantly with the majority of the other seven covered populations addressed in this plan, contributing to their increased likelihood of being digitally excluded.

As with so many identities and experiences, poverty exists on a spectrum. Regarding individuals above 150% of the poverty level as wholly separate from those below 150% of the poverty level is ultimately a reductive activity. Even as some households will never move above or below 150% poverty, many will experience life on both sides of this invisible line. Moreover, income alone is an imperfect metric for determining poverty. Households with income above 150% poverty facing high essential expenses (often related to healthcare, childcare, rising food costs, and transportation) may experience a net financial strain akin to poverty without being able to access services and supports that are designated for low-income households.

A 2023 report authored by United Way states that 35% of Minnesota households were below the ALICE threshold in 2021.[208] The ALICE threshold, first recognized in 2009 by United Way of Northern New Jersey, describes households that are "Asset Limited, Income Constrained, and Employed." ALICE households include those facing deep poverty under federal definitions; they also include those who, due to economic stressors, experience similar struggles of paying for essential services even though their income precludes them from most if not all government assistance programs. Although the Digital Equity Act limits poverty measurements to income, this section of Minnesota's digital opportunity plan also strives to recognize the net financial challenges faced by more than one-third of Minnesota's residents.

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[205] Survey, Columbia Heights. Provided by City of Columbia Heights (Digital Connection Committee).
[206] NOFO.
[207] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.
[208] United Way, "ALICE Essentials Index," *see* "Downloads: Latest National Report."

EMPLOYMENT AND ECONOMIC DEVELOPMENT
OFFICE OF BROADBAND DEVELOPMENT

Minnesota's Digital Opportunity Plan

5.9.1 | Existing Digital Strengths for People in Low-Income Households

Technology Availability, Adoption, and Use

- **Local and tribal governments are running programs to keep low-income residents and tribal members connected.** For example, [Hennepin County Office of Broadband and Digital Inclusion](#) was created in July 2021 and supports residents' technology access through referrals to digital navigators at partnering organizations. Fond du Lac Band of Lake Superior Chippewa's internet service provider—[Aaniin](#)—provides fiber-to-the-home across Fond du Lac Nation and incorporates ACP and Lifeline enrollment into its subscription processes to keep tribal customer costs low.
    - **Some Minnesota cities offer city-wide public wifi.** Minneapolis, for example, accomplishes this through an [outdoor network on 117 hotspots](#) which require no payment or personal information in order to use.
    - **Public libraries in every Minnesota county provide free wifi and computer access.** Statewide, Minnesota has 356 public library locations, 355 of which offer wifi and a combined total of 4,872 public computers and devices.[209] Annually, these locations are open a total of 641,419 hours. In 2021, Minnesota's public libraries supported 1,236,941 internet sessions on their public computers plus an additional 5,848,695 wireless internet sessions among people bringing their own devices.
- **ACP and the Lifeline Program reduce monthly internet costs for low-income households.** ACP reduces home internet costs by $30 per month (or $75 per month for households in Native Nations) for households at or below 200% of the poverty level. Lifeline concentrates on households at or below 135% of the poverty level and provides a discount of $9.25 per month (or $34.25 per month in Native Nations). In Minnesota, 216,423 households are enrolled in ACP, and 71,712 households are enrolled in Lifeline. [210]
- **Some Minnesota-based organizations provide low-cost refurbished computers.** This includes organizations like [Free Geek](#), [PCs for People](#), and [Repowered](#).

Advocates and Educators

- **Staff at Minnesota's 24 Community Action Partnership ([CAP](#)) agencies alleviate poverty through access to resources and services.** CAP services include connecting people with computer access and digital skills. For example, KOOTASCA's [Digital Divide Program](#) directly supports its clients' digital inclusion needs.

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[209] MN Department of Education, "[2021 Minnesota Public Library Annual Report–Outlets](#)."

[210] Universal Service Administrative Company, "[ACP Enrollment and Claims Tracker](#)" and "[Lifeline Program Data](#)."

- **Federal grants are boosting organizations doing ACP outreach.**[211] The Federal Communications Commission is administering competitive funding awards to improve local ACP outreach. Grant recipients in Minnesota include [Leech Lake Band of Ojibwe](#), [Neighborhood House](#), [Ramsey County,](#) and [Tri-County Action Program](#).

5.9.2 | Unsupported Digital Necessities for People in Low-Income Households

- **People in low-income households are less likely to subscribe to broadband.** Minnesota households below 150% poverty saw broadband subscription rates of 75.4%.[212]
    - **Households that cannot afford a contracted broadband subscription might use mobile data instead.** This adds precarity as residents try to stay within monthly data allowances, supplementing mobile data use with public wifi use if possible. The Leech Lake Band of Ojibwe's Digital Connection Committee found 94% of survey respondents from predominantly low-income tribal households were relying on mobile data for their internet service.[213]
    - **Low credit scores can limit which internet service providers and plans people can choose.** A 2018 study found "moderate correlation" between low incomes and low credit scores.[214] Internet service providers running credit checks on prospective customers reserve the right to deny service contracts due to poor or non-existent credit history.
    - **Missed internet service bills in the past can hinder future service.** This is especially true for people with low-income who are living in areas with only one or two internet service providers.
    - **ACP and Lifeline enrollment rates in Minnesota are below the national averages.** Nationally, 35% of all eligible households are participating in ACP, and 19% of all eligible households are participating in Lifeline. In Minnesota, both figures are lower at 27.9% and 12.9%, respectively.[215]
- **People in low-income households are more likely to own only a smartphone.** 19.2% of people in households under 150% poverty had access to only a smartphone.[216] In households between 150% to 200% poverty, this figure dropped to 10%. Households above 200% poverty had access to only a smartphone at a rate of 5.5%.
    - Irreducible Grace Foundation, a non-profit focused on creating safe spaces with youth of color, heard from a survey respondent experiencing poverty who had access to only a

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[211] Federal Communications Commission, "[Affordable Connectivity Outreach Grant Program](#)."

[212] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[213] Survey, Leech Lake Nation. Provided by [Leech Lake Band of Ojibwe](#) (Digital Connection Committee).

[214] Board of Governors of the Federal Reserve, "[Are Income and Credit Scores Highly Correlated?](#)"

[215] Universal Service Administrative Company, "[ACP Enrollment and Claims Tracker](#)" and "[Lifeline Program Data](#)."

[216] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

smartphone that improved technology access would help them, "have a more reliable way to do things that could possibly take a load off my shoulders."[217]

- o In a survey of predominantly low-income Minneapolis adults conducted by Urban Strategies Inc., 35.7% of respondents had access to only a smartphone.[218]

- **Owners of multi-dwelling units and owners of private manufactured home parks hold significant power over their tenants' and residents' choices for internet providers.** 65.3% of Minnesota households with annual income under $20,000 are renters compared to 45.7% of Minnesota households with annual income from $20,000 - $49,000; 32.6% of Minnesota households with annual income from $50,000 - $75,000; and 11.7% of Minnesota households with annual income over $75,000.[219]

5.9.3 | Systemic Challenges Impeding Digital Opportunity for People in Low-Income Households

- **Low-income households experience challenging income-to-broadband cost ratios.** A family of four at 150% of the federal poverty level feels this cost more acutely than a family of four at 50% of the federal poverty level.
    - o **A 2022 study by Consumer Reports found the national median broadband cost was $74.99 per month.** Approximately half of all sample households were paying between $60 and $90 per month.[220]
    - o **Consumers aren't expecting free broadband service.** A City of Duluth survey found 12.6% of respondents identified $21–$30 as an affordable monthly price range, 20.3% identified $31–$40, 31.4% of respondents identified $41–$50, and 14.5% identified $51–$61.[221] Just 1.1% of respondents indicated that $0–$10 would be their most affordable option.
- **The future of ACP is unknown.** Congress first funded ACP under the November 2021 Bipartisan Infrastructure Law using a $14.2 billion appropriation. According to a recent Brookings Institute panel, these funds are expected to run out by mid-2024 unless Congress takes action to infuse the program with more funding.[222]
- **Income– and cost-associated housing issues plus digital inequity plus employment challenges compound on one another in a dangerous cycle.** A survey respondent from Minneapolis describes this experience: "I have a friend who lives on a shoestring and can't afford internet,

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[217] Survey, Saint Paul. Provided by Irreducible Grace Foundation (Digital Connection Committee).

[218] Survey, Minneapolis. Provided by Urban Strategies Inc. (Digital Connection Committee).

[219] ACS 5-Year Estimates, 2017–21. Accessed via IPUMS USA, University of Minnesota.

[220] Consumer Reports, "Broadband Pricing: What Consumer Reports Learned from 22,000 Internet Bills."

[221] Survey, Duluth. Provided by City of Duluth (Digital Connection Committee).

[222] Brookings Institute, "Can Attainable Broadband Deployment be Achieved without the Affordable Connectivity Program?"

and it has made it so much more difficult for her to get a job and even to keep a job. Internet is so important, and everyone should have it, if they want it and are willing to learn how to use it."[223] A person who is unable to afford full technology access misses out on opportunities for upward economic mobility. A person who misses out on opportunities for upward economic mobility is more likely to experience housing issues.

- o **People experiencing homelessness face the steepest systemic challenges to breaking this cycle.** During the January 2022 point-in-time count, 7,917 Minnesotans were found to be experiencing homelessness.[224] Of these, 56% were in emergency shelters, 22% were in transitional housing, and 22% were unsheltered.
- o **Residents of apartment buildings and other multi-dwelling units may experience technology challenges related to income and building ownership.** Minnesota Housing Partnership finds that 169,585 Minnesota renters qualify as being "extremely low income," meaning their income is less than 30% of the area median income.[225] In addition, some apartment buildings have outdated internal wiring that cannot adequately deliver high-speed internet service. Further barriers are associated with building owners establishing service contracts that limit which providers can serve a building.
- o **Residents of manufactured home parks experience similar issues as apartment residents.** Manufactured homes make up 5% of Minnesota household dwellings.[226] HUD surveys find approximately 80% of manufactured home residents are low or very low income. On top of affordability, manufactured home park residents may experience similar issues as apartment residents regarding private park owners limiting which providers can serve the residents.

- **"Affordability" depends on context.** Regarding income alone as the baseline for determining affordability is reductive in cases where significant necessary expenses, such as healthcare or childcare, create a net income akin to poverty. An affordable monthly internet service price-point for one household may be wholly unaffordable for another.

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[223] Survey, Minneapolis. Provided by City of Minneapolis Communications Department (Digital Connection Committee).

[224] MN's Homeless Management Information System, "Point-in-Time Count Information."

[225] Minnesota Housing Partnership, "2021 State of the State's Housing."

[226] All Parks Alliance for Change, "Fact Sheet."

6.0 | Areas of Alignment

"Digital equity is a systemic issue that will require systemic investments ... Digital inequity is a result of policies and systems, and policy and system-level changes would be needed to close the gaps." [227]

This section complements Section 4.0 by situating the plan and its implementation in the context of future collaborators; existing state, local, and tribal digital opportunity plans; and future federal, state, and private funding.

6.1 | Future Collaborators and Ongoing Evaluation of Plan

6.1.1 | Public Participation

Digital Connection Committees

The Digital Connection Committees (DCCs) participating in this planning process have been phenomenal partners and have offered essential perspectives, critical feedback, and ongoing guidance. The continued involvement of the DCCs is integral to the future of digital opportunities in Minnesota.

Throughout the State Digital Equity Capacity Grant period, OBD will continue convening and recruiting DCCs, as well as connecting DCCs with one another. Keen attention will be paid to recruiting community-based organizations that serve a less-represented covered population—such as incarcerated individuals and veterans—and labor organizations that represent positions doing relevant work. Activities will include virtual DCC meetings at least bimonthly as well as a monthly DCC e-newsletter to facilitate routine updates. OBD will intentionally solicit feedback from DCCs on an annual basis to ensure digital opportunity implementation remains relevant.

The annual DCC calendar will be approximately as follows:

Month	Activity
July (Q1)	OBD sends e-newsletter to all DCCs; OBD convenes all DCCs for virtual update
August	OBD sends e-newsletter to all DCCs
September	OBD sends e-newsletter to all DCCs; OBD convenes all DCCs for virtual update

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[227] Digital Connection Committee recommendations, Hennepin County. Provided by SDK Communications and Hennepin County Office of Broadband and Digital Inclusion (Digital Connection Committees).

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October (Q2)	OBD sends e-newsletter to all DCCs; OBD collects feedback via surveys from DCCs on plan progress, potential revisions
November	OBD sends e-newsletter to all DCCs; OBD convenes all DCCs for virtual update; OBD uses virtual update time to collect feedback via small group discussion
December	OBD sends e-newsletter to all DCCs
January (Q3)	OBD sends e-newsletter to all DCCs; OBD convenes all DCCs for virtual update; OBD shares themes from DCC survey and small group discussion
February	OBD sends e-newsletter to all DCCs; OBD recruits new DCCs
March	OBD sends e-newsletter to all DCCs; OBD convenes all DCCs for virtual update
April (Q4)	OBD sends e-newsletter to all DCCs; OBD incorporates DCC feedback into annual plan revisions
May	OBD sends e-newsletter to all DCCs; OBD convenes all DCCs for virtual update; OBD shares revised plan
June	OBD sends e-newsletter to all DCCs

Public Comment

Individuals will be able to provide public comments on OBD's rollout of the State Digital Equity Capacity Grant period using a form on OBD's website or by mail. OBD staff will review comments on a monthly basis and track common themes internally.

The annual public comment schedule will be approximately as follows:

Month	Activity
Year-round	OBD accepts public comments through an online form and by mail. OBD reviews and collates any new comments on a monthly basis.
May (Q4)	OBD incorporates public comments into annual plan revisions and posts online

6.1.2 | Inter-Agency Digital Opportunity Workgroup

From January through April of 2022, shortly after the federal Infrastructure Investment and Jobs Act was signed into law, OBD convened three meetings of an inter-agency digital equity workgroup. This workgroup included representation from MN Department of Agriculture; MN Department of Education; MN Department of Human Services; MN Housing; MN IT Services; and MN Public Utilities Commission.

OBD intends to re-create and expand this group as an inter-agency digital opportunity workgroup that will include additional state agencies and offices representing covered populations more directly:

(1) People living in rural areas: MN Department of Agriculture
(2) Modern elders: Age-Friendly MN
(3) People from minoritized racial and ethnic groups: Council on Asian Pacific Minnesotans; Council for Minnesotans of African Heritage; Minnesota Council on Latino Affairs; Minnesota Indian Affairs Council
(4) People with disabilities: MN Council on Disability
(5) Veterans: MN Department of Veterans Affairs
(6) People who are incarcerated or re-entering society: MN Department of Corrections
(7) People experiencing English language barriers: MN Department of Education
(8) People living in low-income households: MN Department of Human Services

Further representation will address perspectives from other key entities:

(1) Workforce: DEED CareerForce
(2) Higher Education: MN Office of Higher Education; Adult Basic Education
(3) Healthcare: MN Department of Health
(4) Housing: MN Housing
(5) Other: MN IT Services; MN Public Utilities Commission

This workgroup's charge will include the following responsibilities:

(1) Coordinate inter-agency digital opportunity implementation;
(2) Share inter-agency digital opportunity updates; and
(3) Evaluate progress on the digital opportunity plan on an annual basis and revise the plan if necessary.

Meeting will be scheduled no less frequent than quarterly beginning in State Fiscal Year 2025.[228] One meeting per year will involve evaluation on digital opportunity plan progress.

Month	Activity
August (Q1)	OBD convenes workgroup
November (Q2)	OBD convenes workgroup
February (Q3)	OBD convenes workgroup; OBD conducts 1:1 interviews with workgroup members to solicit feedback on plan and workgroup progress

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[228] State Fiscal Year 2025 begins July 1, 2024 and end June 30, 2025.

May (Q4)	OBD convenes workgroup; OBD incorporates feedback into annual plan revisions and shares with workgroup

6.1.3 | Governor's Task Force on Broadband

OBD looks forward to providing the Governor's Task Force on Broadband regular updates, information, and findings relevant to the implementation of the digital opportunity plan. OBD's participation with the Task Force on Broadband is entirely at the Chair's discretion. As such, OBD cannot accurately estimate the level or timing of its involvement.

6.2 | State, Tribal, and Local Coordination

6.2.1 | State Plans, Goals, and Outcomes

The State Digital Equity Planning Grant NOFO identifies five areas where states must address how their digital opportunity plans align. This subsection provides a non-exhaustive list of publicly discoverable plans, recommendations, and reports authored by a variety of state agencies, task forces, councils, and commissions. State executive branch entities are welcome to have their respective plan, report, or other official guiding document added or removed from this list by contacting OBD.

The five areas of alignment identified in the NOFO include the following:

(1) Economic and workforce development: in the table below, this area is labeled "economy"
(2) Education
(3) Health
(4) Civic and social engagement: labeled "civic"
(5) Delivery of other essential services: During OBD's review of state planning documents, two recurring planning areas absent from the NOFO list are climate action and housing. Both of these areas have been incorporated in the table below.
   a. Climate action ("climate") refers to the steps the state has taken and continues to take to address climate change.
   b. Housing refers to all Minnesota residents having a safe, affordable place to live.

Plan Title	Year	Area	Alignment with Digital Opportunity Plan
One Minnesota Plan: Building Blocks	2023–27	Civic Climate Economy Education Health	**Summary:** Enterprise-wide document authored by the Governor's Office. Mission is to "improve the lives of all Minnesotans by working collaboratively to implement policies that achieve results."

Plan Title	Year	Area	Alignment with Digital Opportunity Plan
		Housing	**Interaction and Impact:** The DO Plan will help state collaboratively implement inter-agency policies ensuring a more digitally equitable future for all Minnesotans **Covered Populations:** All **Aligned Activities:** 3.1.1.A.b
Age-Friendly MN Multi-Sector Blueprint	2023–33	Economy Health	**Summary:** Plan is in development. **Interaction and Impact:** The DO Plan will help state reduce systemic challenges for modern elders trying to access and meaningfully use technology. **Covered Populations:** Modern elders **Aligned Activities:** TBD
Climate Action Framework: Summary of Action Steps	2021	Climate	**Summary:** Includes an action step to, "Support broadband connectivity, particularly for rural and underserved areas, to provide more options to access services." **Interaction and Impact:** The DO Plan will help state improve broadband access and subscriptions for people living in Greater Minnesota **Covered Populations:** All especially People Living in Greater Minnesota **Aligned Activities:** 3.1.1.B.a; 3.1.1.B.b; 3.2.1.A.d; 3.2.1.B.b; 3.2.1.B.a; 3.2.1.B.c; 3.3.1.A.a; 3.3.1.A.c; 3.3.1.B.a
Council on Asian Pacific Minnesotans: Biennial Legislative Priorities	2023–24	Civic Economy Education Health	**Summary:** Council's five priority areas are mental health, higher education, equity, the achievement gap, and healthcare access. **Interaction and Impact:** The DO Plan will help state improve digital inclusion and achievement

Plan Title	Year	Area	Alignment with Digital Opportunity Plan
			of quality of life goals among Asian Pacific Minnesotans **Covered Populations:** People from Minoritized Racial/Ethnic Groups **Aligned Activities:** 3.3.1.A.a; 3.3.1.B.a; 3.3.1.C.b; 3.3.1.C.d
[Council on Economic Expansion: Roadmap for Equitable Economic Expansion](#)	2022	Civic Economy	**Summary:** Includes actionable strategy to, "Achieve equitable access to affordable broadband internet." **Interaction and Impact:** The DO Plan will leverage technology access to help state achieve equitable access to affordable broadband. **Covered Populations:** All **Aligned Activities:** 3.3.1.A.a; 3.3.1.A.c; 3.3.1.B.a; 3.2.1.A.b; 3.2.1.B.a
[Council on Latino Affairs: 2023 Legislative Priorities](#)	2023	Civic Economy Education Health	**Summary:** Council's four priority areas are lifelong learning, prosperity and financial stability, health and wellbeing, and immigration and belonging. **Interaction and Impact:** The DO Plan will help state improve digital inclusion and achievement of quality of life goals among Latino Minnesotans **Covered Populations:** People from Minoritized Racial/Ethnic Groups **Aligned Activities:** 3.3.1.A.a; 3.3.1.B.a; 3.3.1.C.b; 3.3.1.C.d
[Department of Corrections: Strategic Plan](#)	2020–22	Civic Economy Education Health	**Summary:** Includes goals to, "increase the number of people released from prison who within 30 days obtain housing, meaningful employment, enroll in educational programming, or actively engage in community-based treatment."

Plan Title	Year	Area	Alignment with Digital Opportunity Plan
		Housing Social	**Interaction and Impact:** The DO Plan will help DOC attain meaningful employment and engage in community-based activities, education, and health supports. **Covered Populations:** People who are Incarcerated or Re-Entering Society **Aligned Activities:** 3.1.1.B.a; 3.1.1.B.b; 3.2.1.A.d; 3.2.1.B.b; 3.3.1.A.a; 3.3.1.C.a
[Department of Education: Due North Education Plan](#)	Not specified	Education	**Summary:** Includes an objective to, "expand career and technical education pathways." **Interaction and Impact:** The DO Plan will help students access affordable internet service at home. **Covered Populations:** All **Aligned Activities:** 3.1.1.A.b; 3.1.1.C.a; 3.2.1.A.d; 3.2.1.B.b; 3.3.1.C.c
[Department of Education: Library Services and Technology Act 5-Year Plan](#)	2023–27	Civic	**Summary:** Identifies "prioritization of digital equity, broadband access, and literacy efforts" as a public library need. **Interaction and Impact:** The DO Plan will help public libraries implement digital inclusion activities on a local level. **Covered Populations:** All **Aligned Activities:** 3.1.1.B.a; 3.1.1.B.b; 3.2.1.A.b
[Department of Employment and Economic Development: Objectives and Key Results](#)	2023–24	Economy	OBD is part of DEED.

Plan Title	Year	Area	Alignment with Digital Opportunity Plan
Department of Human Services: Agency-Wide Strategic Plan	2020–22	Health Housing Social	**Summary:** Includes a relevant strategy to, "Explore and evaluate options for providing post-discharge telehealth psychiatric and primary care services for direct care clients who are having difficulties finding private provider care." **Interaction and Impact:** The DO Plan will help individuals access telehealth services. **Covered Populations:** All **Aligned Activities:** 3.1.1.B.a; 3.1.1.B.b; 3.3.1.C.d
Department of Human Services: Parent Aware Equity Report	2021	Economy Education	**Summary:** Identifies digital opportunity as barrier to early learning providers obtaining Parent Aware ratings. Names high-level solution: "Support all providers to access high-speed, affordable broadband; work to resolve and support provider technology needs and skills so they can have an optimal Parent Aware experience." **Interaction and Impact:** The DO Plan will help childcare providers access affordable internet service at home to expand the impact of their businesses. **Covered Populations:** All **Aligned Activities:** 3.1.1.C.b; 3.3.1.C.c
Department of Veterans Affairs: Legislation Session Summary	2023	Economy Health	**Summary:** Identifies new changes and initiatives relevant to passage of GI Bill expansion. **Interaction and Impact:** The DO Plan will support veterans homes and other community-based organizations in expanding digital inclusion services to veterans, facilitating educational attainment through the GI Bill. **Covered Populations:** Veterans

Plan Title	Year	Area	Alignment with Digital Opportunity Plan
			Aligned Activities: 3.1.1.B.a; 3.1.1.B.b; 3.3.1.A.a; 3.3.1.A.c; 3.3.1.B.a; 3.3.1.C.c
Great Start for All Minnesota Children Task Force: Final Report	2023	Economy Education	**Summary:** Includes a relevant recommendation that, "The state should consider programs focused on developing business acumen, including technology skills, for small business owners from historically disenfranchised communities and in areas with childcare deserts." **Interaction and Impact:** The DO Plan will help small business owners through targeted grants and expand childcare services. **Covered Populations:** All **Aligned Activities:** 3.1.1.A.b; 3.1.1.C.a; 3.2.1.A.d; 3.2.1.B.b; 3.3.1.C.c
MN Housing: Strategic Plan, *see* "Working Documents for 2024–2027 Strategic Plan"	2024–27	Housing	**Summary:** Identifies "support people needing services" as a strategic objective and names people with disabilities and modern elders as two key groups to support. **Interaction and Impact:** The DO Plan will help individuals improve technology skills needed to search and apply for housing services. **Covered Populations:** All, especially People with Disabilities and Modern Elders **Aligned Activities:** 3.1.1.A.b; 3.3.1.A.b
MN IT Services: Minnesota's Cybersecurity Plan	2023	Civic	**Summary:** States one intention is to, "Grow the Minnesota cybersecurity community, collaborate, and share technology and information about industry changes and emerging threats."

Plan Title	Year	Area	Alignment with Digital Opportunity Plan
			Interaction and Impact: The DO Plan will help improve individuals' understanding of cybersecurity.
			Covered Populations: All
			Aligned Activities: 3.1.1.A.b; 3.2.1.C.a; 3.2.1.C.b
MN IT Services: Technology Advisory Council Report	2023	Civic	**Summary:** Addresses accessibility of state agency online tools. Recommends all agencies "understand and meet the accessibility needs of all customers and staff when planning, developing, purchasing, and maintaining digital products and services."
			Interaction and Impact: The DO Plan will help local governments expand accessibility of web-based services.
			Covered Populations: All, especially People with Disabilities and Modern Elders
			Aligned Activities: 3.1.1.A.b; 3.2.1.C.a; 3.2.1.C.b
Office of Higher Education: Educating for the Future	2015–25	Education	**Summary:** Includes a goal that, "70% of Minnesota adults (ages 25–44) will have attained a postsecondary certificate or degree by 2025."
			Interaction and Impact: The DO Plan will help individuals access the technology needed to enroll in and complete postsecondary programs.
			Covered Populations: All
			Aligned Activities: 3.3.1.A.a; 3.3.1.A.c; 3.3.1.B.a
Olmstead Implementation Office: MN Olmstead Plan	2022–24	Housing	**Summary:** Includes assistive technology activities and vision statement that, "People of all ages and all disability types will have assistive and other technologies necessary to support living, learning, working and enjoying life in the most integrated settings."

Plan Title	Year	Area	Alignment with Digital Opportunity Plan
			Interaction and Impact: The DO Plan will help individuals access assistive technologies. **Covered Populations:** People with Disabilities and Modern Elders **Aligned Activities:** 3.1.1.B.a; 3.1.1.B.b; 3.2.1.C.a; 3.2.1.C.b

6.2.2 | Tribal Broadband Development and Digital Opportunity Planning

The State of Minnesota has clear protocols for how its agencies interact with the 11 federally recognized tribes sharing this geography. This is outlined in Minn. Stat. § 10.65. In conjunction with OBD's federal BEAD planning process, DEED is participating in tribal consultation around broadband and digital inclusion as tribes see fit. Throughout the duration of the State Digital Equity Capacity Grant period, OBD will continue to work with DEED's tribal liaison to ensure tribal digital opportunity needs and goals are addressed.

Parallel to the State Digital Equity Planning Grant program, NTIA is administering the Tribal Digital Equity Planning Grant program, also funded through the Infrastructure Investment and Jobs Act. By July 12, 2022, tribes were required to submit letters of intent to apply for the Tribal Digital Equity Planning Grant program. The following tribes submitted letters of intent:[229]

(1) Bois Forte Band of Chippewa
(2) Fond du Lac Band of Lake Superior Chippewa
(3) Leech Lake Band of Ojibwe
(4) Lower Sioux Indian Community
(5) Mille Lacs Band of Ojibwe
(6) Prairie Island Indian Community
(7) Red Lake Nation
(8) White Earth Nation

As of November 15, 2023, a Notice of Funding Opportunity allowing tribes to apply for the Tribal Digital Equity Planning Grant program has not yet been released, delaying the creation of any federally-funded tribal digital opportunity plans.

Tribes electing to not submit letters of intent are:

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[229] NTIA, "Letters of Intent Submitted for the Digital Equity Planning Program by Tribal Organization and State."

(1) Grand Portage Band of Lake Superior Chippewa
(2) Shakopee Mdewakanton Sioux Community
(3) Upper Sioux Community

Also included in the Infrastructure Investment and Jobs Act, the Tribal Broadband Connectivity Program provides $3 billion specifically for tribal broadband infrastructure and use projects. Funding is being administered directly by NTIA across two competitive grant rounds. Tribes receiving funding in Round One include the following:[230]

(1) Bois Forte Band of Chippewa ($19,800,704): Install fiber directly connecting 2,097 unserved Anishinaabe households, plus more than 60 businesses and community anchor institutions with up to 1 Gbps fiber to the home qualifying broadband service.
(2) Leech Lake Band of Ojibwe ($18,797,452): Install fiber and fixed wireless to directly connect 4,399 unserved Anishinaabe households with qualifying broadband service (fiber to the home service up to 100/40 Gbps and wireless service up to 80/20 Mbps).
(3) Lower Sioux Indian Community ($1,995,787): Install fiber directly connecting 47 unserved Dakota households, 3 businesses, and 13 community anchor institutions with fiber to home qualifying broadband service at speeds up to 10 Gbps symmetrical.
(4) Mille Lacs Band of Ojibwe ($11,407,585): Install fiber to directly connect 356 unserved Anishinaabe households, 7 unserved Anishinaabe businesses, and 10 unserved community anchor institutions with service ranging from 250/250 Mbps to 1000/1000 Mbps.
(5) White Earth Nation ($500,000): Equip 6 community centers/business incubators with computer stations and online training courses for the approximately 3,343 White Earth Tribal Members.

6.2.3 | Local Digital Opportunity Planning

OBD conducted a non-exhaustive inventory of township, city, and county plans that address any one of five digital opportunity activities.[231] The five activities are as follows:

(1) Broadband availability: Does the plan assess for and deliver a strategy to expand broadband availability? This aligns with BEAD.
(2) Broadband affordability: Does the plan assess for and deliver a strategy to provide lowered broadband costs to low-income households?[232] This aligns with Objective 1: Internet Access.
(3) Device availability: Does the plan assess for and deliver a strategy to distribute internet-enabled devices to low-income households? This aligns with Objective 2: Devices.

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[230] NTIA, "Tribal Broadband Connectivity Program: Round One Award Recipients."

[231] See Appendix E.

[232] While many plans identify affordability as a need, fewer present strategies to address this need in a practicable, systemic way.

(4) Digital skills: Does the plan assess for and deliver a strategy to improve residents' access to digital skills training? Does the plan assess for and deliver a strategy to improve residents' access to a trusted provider of technical support? This aligns with Objective 3: Digital Skills.

(5) Accessibility: Does the plan assess for and deliver a strategy to improve accessibility of its web-based resources? This aligns with Objective 4: Accessibility.

In reviewing the plans gathered for this inventory, OBD found none that include all five elements; specifically, none address accessibility of web-based resources. Most plans focus exclusively on broadband infrastructure. While some identify affordability as a need, few present strategies to address this need in a practical way, very few address device ownership, and very few address digital skills. This insight has led OBD to incorporate local digital opportunity planning into the activities proposed by this plan.

6.3 | Future Funding for Digital Opportunity

The State Digital Equity Planning Grant NOFO requires a description of how Minnesota will coordinate its State Digital Equity Capacity Grant funding with its Broadband Equity, Access, and Deployment (BEAD) funding and other federal, state, or private funding supporting digital opportunity work. At this time, OBD's future digital opportunity work is funded exclusively with Digital Equity Grant Program funds. As such, this section of the plan focuses on the alignment of the Digital Equity Planning and Capacity Grant funds with the BEAD funds. Because of Minnesota's expansive geography, it is not assumed that OBD will be able to allocate any BEAD funding to the fourth BEAD priority of "digital equity activities."

Both BEAD and the State Digital Equity Grant funding are being administered by OBD. OBD's Deputy Director oversees the office's infrastructure work, including BEAD; OBD's Digital Equity Program Lead was hired specifically to lead the development of the Digital Opportunity Plan and initiate its implementation. These two staff members, their respective teams, and the OBD Executive Director meet weekly as one cohesive team to share updates, align strategies, exchange information, and problem-solve. These meetings will continue throughout the planning and implementation of both programs. As BEAD funding is awarded, OBD's digital equity team will be able to promptly communicate relevant digital opportunity grants with cities, counties, and townships that will see buildouts.

OBD's infrastructure and digital opportunity teams have collaborated during numerous meetings with partners. For example, staff from both teams co-presented at a 15-day series of meetings hosted by the Minnesota Association of Townships; at the annual League of Minnesota Cities conference; at a meeting of the Minnesota State Bar Association's Communications Law Section; and at the Minnesota Cable Communications Association annual conference. During the digital opportunity plan public comment period, infrastructure staff accompanied digital equity staff at 15/17 of the in-person listening sessions.

"Our imagination is our greatest limitation." [233]

While many components of this plan are required under the State Digital Equity Planning Grant Notice of Funding Opportunity, the content of this plan is entirely Minnesota's—the methodologies used to create it, the strategies it recommends, and its intended outcomes. Its submission to NTIA represents a significant milestone. For so long, digital opportunity work has happened on the fringes. This plan is a step toward centering digital opportunity in Minnesota.

During the course of preparing this plan, OBD and its DCC partners heard from thousands of Minnesotans about the role technology plays in helping them achieve their quality-of-life goals. Across these perspectives, access to technology consistently means access to education, access to healthcare, access to career advancement, access to housing, and access to basic government services. Access to technology means access to the world and to new ideas. Access to technology means stronger connections to one another.

It has never been OBD's goal to present a digital opportunity plan *for* Minnesota. Rather, from to onset, OBD has strived to ensure this plan *belongs to* Minnesota. Here we are: This is Minnesota's digital opportunity plan, and it has been OBD's immense privilege to be the public steward charged with piecing it together.

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[233] Individual interview, Bemidji. Provided by Kairos Alive (Digital Connection Committee).

Appendix A | Digital Connection Committee List

As of November 15, 2023, the following Digital Connection Committees (DCCs) were registered with OBD. DCCs receiving Assessing Digital Inclusion Mini Grants are denoted using an asterisk after their host organization name.

NTIA asked OBD to include which covered populations are represented by or reached by each DCC. This is reflected in the columns labeled 1–8:

(1) People living in rural areas
(2) Modern elders
(3) People from minoritized racial and ethnic groups
(4) People with disabilities
(5) Veterans
(6) People who are incarcerated or re-entering society
(7) People experiencing English language barriers
(8) People living in low-income households

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
30,000 Feet	Saint Paul			x					x
African Career, Education & Resources, Inc. (ACER)	Brooklyn Park	x	x	x				x	x
African Community Senior Services*	Minneapolis		x	x	x			x	x
AG Consulting and Media*	Minneapolis			x				x	x
Aitkin County*	Aitkin	x	x	x	x	x			x
Alliance for Asian Pacific Minnesotans*	Rochester		x	x				x	x
Asian Media Access*	Minneapolis		x	x		x		x	x
Aurora/St. Anthony Neighborhood Development Corp.*	Saint Paul		x	x					x

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Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Austin Aspires*	Austin	x	x	x	x	x		x	x
Beyond Media Solutions*	Brooklyn Park			x				x	x
Biwabik Township	Gilbert	x	x			x			x
CCX Media*	Brooklyn Park		x	x	x	x		x	x
Chinese American Chamber of Commerce*	Bloomington			x				x	x
Chinese Cultural Center*	Bloomington			x				x	x
City of Columbia Heights*	Columbia Heights		x	x	x	x		x	x
City of Dennison*	Dennison	x	x						x
City of Duluth*	Duluth	x	x	x	x	x		x	x
City of Minneapolis - Communications Department	Minneapolis	x	x	x	x	x		x	x
Community Technology Empowerment Project (CTEP)	Saint Paul			x					x
Dorothy Day Center	Saint Paul	x		x	x			x	x
East Central Regional Arts Council	Hinckley	x							
East Central Minnesota Educational Cable Cooperative (ECMECC)	Braham	x		x	x			x	x
Family Service Rochester*	Rochester	x	x	x	x	x		x	x
Fergus Falls Public Library	Fergus Falls	x	x	x	x	x	x	x	x

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Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Gifts For Seniors*	Minneapolis	x	x	x	x	x		x	x
Global Entrepreneurship Week Minnesota*	Minneapolis			x	x			x	x
GMCC (formerly Greater Minneapolis Council on Churches)*	Minneapolis		x	x	x	x	x	x	x
Greater Mankato Growth, Inc.	Mankato	x	x	x	x	x		x	x
Grow Us	Minneapolis	x	x	x	x	x	x	x	x
Headwaters Regional Development Commission*	Bemidji	x	x		x	x			x
HealtheMed, Inc.	Minnetonka	x	x	x	x	x		x	x
Hennepin County Office of Broadband and Digital Inclusion	Minneapolis		x	x	x		x	x	x
Hennepin Healthcare	Minneapolis		x	x	x		x	x	x
Hibbing Public Library*	Hibbing	x	x		x				x
Hired*	Bloomington		x	x	x	x	x	x	x
Hispanic Advocacy and Community Engagement Through Research (HACER)*	Saint Paul			x				x	x
Hubbs Center	Saint Paul			x				x	x
Ideal Township	Pequot Lakes	x	x	x	x	x			x
International Institute of Minnesota*	Saint Paul			x				x	

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Irreducible Grace Foundation*	Saint Paul			x					x
ISD 622, 624, and 832 Adult Education	Maplewood		x	x	x	x		x	x
Kairos Alive*	Minneapolis	x	x	x	x			x	x
Kandiyohi County and City of Willmar Economic Development Commission*	Willmar	x	x	x	x	x		x	x
Koochiching Technology Initiative*	International Falls	x	x	x	x	x			x
Leech Lake Band of Ojibwe*	Cass Lake	x	x	x	x	x	x	x	x
Literacy Minnesota*	Saint Paul							x	x
Little Crow Telemedia Network	Hutchinson	x		x				x	x
Mahnomen County Economic Development Commission	Mahnomen	x	x	x	x	x		x	x
Metro North Adult Basic Education	Anoka	x	x	x	x	x	x	x	x
Metropolitan Library Service Agency (MELSA)	Saint Paul		x	x	x	x		x	x
Minnesota Alliance of Boys and Girls Clubs*	Roseville	x		x				x	x
Minnesota Department of Education	Minneapolis	x		x	x		x	x	x
Mower County Seniors, Inc.*	Austin	x	x		x	x			
North Metro Telecommunications Commission*	Blaine		x	x	x	x		x	x

EMPLOYMENT AND ECONOMIC DEVELOPMENT
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Minnesota's Digital Opportunity Plan

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
North Suburban Communications Commission*	Roseville		x	x	x	x		x	x
Northfield Healthy Community Initiative*	Northfield	x		x				x	x
Northland Hackathon	Fergus Falls	x							x
Northspan Group, Inc.	Duluth	x	x	x	x	x	x	x	x
Oromo Community of Minnesota*	Saint Paul			x				x	x
Otter Tail County	Fergus Falls	x	x	x	x	x	x	x	x
OurTech Co-Op*	Roseville		x	x	x	x		x	x
PCs for People	Saint Paul			x					x
Phyllis Wheatley Community Center	Minneapolis			x					
Pine County*	Pine City	x	x	x	x	x	x		x
Project 1590*	Truman	x	x			x			x
Quad City Public Libraries (Eveleth, Gilbert, Mountain Iron, Virginia)*	Virginia	x	x	x	x	x			x
Quatrefoil Library	Minneapolis	x	x	x	x				x
Raíces Latinas*	Stillwater		x	x				x	x
Ramsey County and City of Saint Paul	Saint Paul		x	x	x	x	x	x	x
Reconnect Rondo*	Saint Paul		x	x	x	x		x	x

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Repowered*	Saint Paul						x		
Rice County*	Faribault	x	x	x	x	x	x	x	x
Rock County Community Library	Luverne	x	x	x	x	x		x	x
Roots Wellness Center*	Saint Paul		x	x	x	x	x	x	x
Saint Paul Community Literacy Consortium	Saint Paul			x	x		x	x	x
SDK Communications + Consulting	Minneapolis		x	x	x		x	x	x
Senior Community Services*	Minnetonka		x		x	x			
Smart North*	Minneapolis			x				x	x
South Central Service Coop / Socrates Online*	North Mankato	x		x	x			x	x
South Washington County Telecommunication Commission*	Cottage Grove		x	x	x	x	x	x	x
Southwest Center for Independent Living	Marshall	x	x	x	x	x		x	x
St. Paul & Minnesota Foundation - Partnership for a Connected MN	Saint Paul	x	x	x	x	x		x	x
Thai Cultural Council*	Saint Louis Park		x	x	x	x		x	x
Todd County Broadband Coalition*	Bertha	x	x	x	x	x	x	x	x
Town of White*	Aurora	x	x		x	x			x
Traverse Des Sioux Library Cooperative*	Mankato	x	x	x	x	x		x	x

Host Organization	Host's Primary Location	1	2	3	4	5	6	7	8
Twin Cities West Metro Asian Fair*	Plymouth		x	x	x	x		x	x
UMN - Twin Cities: Urban Research and Outreach Center	Minneapolis		x	x	x	x	x	x	x
UMN - Crookston: Veden Center for Rural Development*	Crookston	x							
Upper Minnesota Valley Regional Development Commission*	Appleton	x							
Urban Strategies*	Minneapolis		x	x	x	x	x	x	x
Viking Library System*	Fergus Falls	x							
Virginia Housing Authority	Virginia		x		x	x			x
Waseca-Le Sueur Library System*	Waseca	x							
Wilderness Health*	Two Harbors	x	x	x	x	x		x	x
Women's Wellness and Parenting Support Center*	Bloomington		x	x	x			x	x
Wright County	Buffalo	x	x	x	x	x		x	x
YNIIGI - You Need It, I Got It, LLC	Minneapolis		x	x	x	x	x	x	x
Zephyr Valley Community Coop	Rushford	x							

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Minnesota's Digital Opportunity Plan

Appendix B | Collaborators

While assembling this plan, OBD met in some capacity with the following organizations and agencies. These meetings occurred from December 1, 2022 through November 15, 2023. Asterisks denote organizations and agencies where meetings were held at least in part due to their Digital Connection Committee participation.

- 1 Day at a Time
- AARP Minnesota
- African Career, Education, & Resources, Inc. (ACER)*
- African Community Senior Services*
- AG Consulting and Media*
- Aitkin County*
- All Elders United for Justice
- Alliance for Asian Pacific Minnesotans*
- Ameelio
- Asian Media Access*
- ASL Now
- Aurora/St. Anthony Neighborhood Development Corp.*
- Austin Aspires*
- Beyond Media Solutions*
- CCX Media*
- Chinese American Chamber of Commerce*
- Chinese Cultural Center*
- City of Columbia Heights*
- City of Duluth*
- Collectivity
- Comcast
- Common Sense Media
- Communications Workers of America
- Council of Regional Public Library System Administrators
- Digitunity
- Duluth Aging Services
- Economic Development Association of Minnesota
- EducationSuperHighway
- Family Service Rochester*
- Federal Reserve Bank of Minneapolis: Center for Indian Country Development
- Fond du Lac Band of Lake Superior Chippewa
- Gifts for Seniors*
- Girls Dream Code

- Global Entrepreneurship Week Minnesota*
- GMCC (formerly Greater Minneapolis Council on Churches)*
- Governor's Task Force on Broadband
- Great River Regional Library
- Greater Mankato Growth*
- Grow Us*
- Hallie Q. Brown Community Center
- Headwaters Regional Development Commission*
- HealtheMed, Inc.*
- Hennepin County
- Hibbing Public Library*
- Hired*
- Hispanic Advocacy and Community Engagement Through Research (HACER)*
- International Institute of Minnesota*
- Irreducible Grace Foundation*
- Kairos Alive*
- Kandiyohi County and City of Willmar Economic Development Commission*
- Koochiching Technology Initiative*
- Lead for America: American Connection Corps
- League of Minnesota Cities
- Leech Lake Band of Ojibwe*
- Leech Lake Tribal College
- Literacy Minnesota*
- Lower Sioux Indian Community
- Maamigan Achigaazo – White Earth Community Library
- Metro Meals on Wheels
- Metropolitan Library Service Agency (MELSA)*
- Minitex
  - Minitex Connect Conference
  - Policy Advisory Council
- Minneapolis City Councilor LaTrisha Vetaw
- Minneapolis Youth Coordinating Board*
- Minnesota Alliance of Boys and Girls Clubs*
- Minnesota Association of Professional County Economic Developers
- Minnesota Association of Townships
- Minnesota Cable Communications Association
- Minnesota Council on Disability
- Minnesota Department of Corrections
- Minnesota Department of Employment and Economic Development
  - CareerForce

- o   Governor's Workforce Development Board
- o   Small Cities Development Program
- Minnesota Department of Health
  - o   Health Equity Networks
- Minnesota Department of Human Services
  - o   Age-Friendly Minnesota
  - o   Age-Friendly Minnesota Council
  - o   Children and Family Services
  - o   Deaf and Hard of Hearing Services Division
- Minnesota Department of Transportation
- Minnesota Library Association
- Minnesota Public Utilities Commission
- Minnesota State Bar Association: Telecommunications Subcommittee
- Mower County Seniors, Inc.*
- Neighborhood House
- North Metro Telecommunications Commission*
- North Suburban Communications Commission*
- Northfield Healthy Community Initiative*
- Northspan Group, Inc.*
- Office of U.S. Senator Amy Klobuchar
- Office of U.S. Senator Tiny Smith
- Oromo Community of Minnesota*
- OurTech Co-Op*
- Paul Bunyan Telecommunications
- Pine County*
- Prairie Island Indian Community
- Project 1590*
- Quad City Public Libraries (Eveleth, Gilbert, Mountain Iron, Virginia)*
- Raíces Latinas*
- Ramsey County
- Range Association of Municipalities and Schools (RAMS)
- Reconnect Rondo*
- Red Lake Nation
- Repowered*
- Rice County*
- Rochester Public Library
- Roots Wellness Center*
- Saint Paul Chamber of Commerce
- Saint Paul Community Literacy Consortium
- Saint Paul Public Library

- SDK Communications + Consulting
- Senior Community Services*
- Shavlik Family Foundation
- Smart North*
- South Central Service Coop / Socrates Online*
- South Washington County Telecommunications Commission*
- Southwest Center for Independent Living*
- Summit Academy OIC
- Thai Cultural Council*
- Three Rivers Community Action
- Todd County Broadband Coalition*
- Town of White*
- Traverse des Sioux Library Cooperative*
- Tribal College Librarians Institute
- Twin Cities West Metro Asian Fair*
- University of Minnesota
    - Great Plains Telehealth Resource and Assistance Center (gpTRAC)
    - Extension
    - Learning Network of Minnesota
    - Urban Research and Outreach Center*
    - Veden Center for Rural Development*
- Upper Minnesota Valley Regional Development Commission*
- Urban Strategies*
- Viking Library System*
- Waseca-Le Sueur Library System*
- Wilderness Health*
- Women's Wellness and Parenting Support Center*
- Zephyr Valley Community Coop*
- Warroad Community Development

Appendix C | Baseline Measures for Covered Populations

Population	Internet Adoption	Devices	Digital Skills	Accessibility
People Living in Rural Areas	66.8%	77.6%	Pending[234]	Pending
Modern Elders	79.6%	77.4%	Pending	Pending
People from Minoritized Races/Ethnicities	78.5%	78.4%	Pending	Pending
Veterans	81.5%	81.0%	Pending	Pending
People with Disabilities	79.0%	69.8%	Pending	Pending
People who are Incarcerated or Re-entering	64.1%[235]	42.2% (laptop)[236] 26.6% (desktop)	Pending	Pending
People Experiencing Language Barriers	65.3%	63.0%	Pending	Pending
People Living in Low-Income Households	75.4%	68.5%	Pending	Pending

Internet adoption refers to Minnesotans' adoption of broadband internet. This measurable objective is aligned with "the availability of, and affordability of access to, fixed and wireless broadband technology" as required in the NOFO. This is measured using ACS data describing the percentage of households that subscribe to broadband internet service.

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[234] This component, along with all other occurrences of "pending" in this table, will be determined during Phase 1 of implementation.

[235] This figure is from the survey conducted by Repowered's DCC.

[236] These figures are from the survey conducted by Repowered's DCC.

Devices refers to Minnesotans' access to large-screen devices. This measurable objective is aligned with "the availability and affordability of consumer devices" as required in the NOFO. This is measured using ACS data describing the percentage of households that report having at least one laptop or desktop computer available.

Digital skills refers to Minnesotans' access to training that supports digital skills and cybersecurity awareness. This measurable objective is aligned with "digital literacy" and "technical support for those devices" as required in the NOFO. It is also aligned with "awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual" as required in the NOFO. This is measured using mapping data that describes the percentage of households located within a 60-minute round-trip drive or ride on public transit from the nearest public location (public library, community college, non-profit, CareerForce location, etc.) that provides free basic digital skills and cybersecurity support.

Accessibility refers to the accessibility of web-based state, local, and tribal government information. This measurable objective is aligned with "the online accessibility and inclusivity of public resources and services" as required in the NOFO. This will be measured using an equally-weighted combination of three factors:

(1) the percentage of county, city, and tribal government websites that meet the accessibility standards set forth in Minn. Stat. § 16E.03;
(2) the percentage of county, city, and tribal government websites that reflect a Flesch Readability Score of 90 – 100; and
(3) the percentage of county, city, and tribal government websites that provide translations of certain essential information in alignment with local linguistic diversity.

Appendix D | Target Measures for Covered Populations

Population	Internet Adoption	Devices	Digital Skills	Accessibility
People Living in Rural Areas	88.4%	92.2%	Pending[237]	Pending
Modern Elders	92.9%	92.1%	Pending	Pending
People from Minoritized Races/Ethnicities	92.5%	92.4%	Pending	Pending
Veterans	93.5%	93.4%	Pending	Pending
People with Disabilities	92.7%	89.4%	Pending	Pending
People who are Incarcerated or Re-entering	87.4%	79.8%	Pending	Pending
People Experiencing Language Barriers	87.6%	87.1%	Pending	Pending
People Living in Low-Income Households	91.4%	89.0%	Pending	Pending

Target measures for 2028 were determined through a two-step process:

(1) calculate the factor equivalent to 65% of the gap between 2023 measures and 100%
(2) add this factor to the baseline measure

This example demonstrates target measure calculations for people living in rural areas:

(1) 100% - baseline → 100% - 66.8% = 33.2%
(2) 33.2% + baseline → 33.2% + 66.8% = 88.4%

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[237] This component, along with all other occurrences of "pending" in this table, will be determined during Phase 1 of implementation.

Appendix E | Local and Tribal Plans

The table below provides an overview of publicly discoverable tribal, township, city, county, and regional plans addressing one or more of the following six facets relevant to digital opportunity:

(1) Broadband availability: Does the plan assess for and deliver a strategy to expand broadband availability? **This aligns with BEAD.**

(2) Broadband affordability: Does the plan assess for and deliver a strategy to provide lowered broadband costs to low-income households?[238] **This aligns with Objective 1: Internet Access.**

(3) Device availability: Does the plan assess for and deliver a strategy to distribute internet-enabled devices to low-income households? **This aligns with Objective 2: Devices.**

(4) Digital skills: Does the plan assess for and deliver a strategy to improve residents' access to digital skills training? Does the plan assess for and deliver a strategy to improve residents' access to a trusted provider of technical support? **This aligns with Objective 3: Digital Skills.**

(5) Accessibility: Does the plan assess for and deliver a strategy to improve accessibility of its web-based resources? **This aligns with Objective 4: Accessibility.**

(6) Other: This category is elaborated in footnotes.

This list is non-exhaustive. Tribal, township, city, county, and regional officials who would like their plan added or removed from this list may make that request by contacting OBD.

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
Benton County Broadband Feasibility Study	2021	x	x				
Benton County 2040 Comprehensive Plan	2020	x					x[239]
Blue Earth [city] Comprehensive Plan	2019						x[240]
Blue Earth County Broadband Feasibility Study	2019	x					

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[238] While many plans identify affordability as a need, fewer present strategies to address this need in a practicable, systemic way.

[239] Stated policy: "Extend broadband service throughout the entire County by 2040."

[240] Stated policy: "Encourage providers of high-speed internet access to stay current with technologies related to the availability of broadband access to the internet."

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
Carlton County Broadband Feasibility Study Report	2016	x					
Cass County Comprehensive Plan	2021	x					
Cherry Township, Executive Summary, Broadband Roadmap	2018	x					
Chisago County Comprehensive Plan	2017						x[241]
Chisholm, Executive Summary, Broadband Roadmap	2018	x					
Clay County Comprehensive Plan	2022						x[242]
Cook County, MN: Land Use Guide Plan	2016	x					
Dakota County, MN: Broadband Survey Report	2022						x[243]
Dodge County, MN, Comprehensive Plan	2019						x[244]
Duluth Digital Access Master Plan	2022	x	x	x	x		
Edina Comprehensive Plan	2020						x[245]

[241] Includes five goals and 14 policies pertaining to broadband infrastructure and adoption.

[242] Identifies broadband development as a necessity in supporting increased demand for telecommuting.

[243] This document presents survey findings relevant to digital opportunity planning.

[244] Stated policy: "Promote access to quality broadband for all of the County's residents by (1) Communicating with existing private broadband providers to discuss challenges to provide broadband service to the rural areas of the County and (2) Identify[ing] opportunities to access State and Federal funding programs to assist in broadband projects."

[245] Stated goal: "Ensure that Edina residents and businesses have access to world-class broadband infrastructure at competitive rates."

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
Fond du Lac Reservation Comprehensive Plan 2020-2040	2021						x[246]
Hennepin County and City of Minneapolis Professional Services Agreement (referenced in this document)	2020	x	x	x	x		
Hibbing, Executive Summary, Broadband Roadmap	2018	x					
International Falls Comprehensive Plan	2020						x[247]
Iron Range Communities Broadband Roadmap	2018	x					
Kerkhoven Comprehensive Plan	2020						x[248]
Laurentian, Tower, and East Range Broadband Roadmap	2021	x					
Le Sueur County Broadband Feasibility Study	2019	x					
Lincoln County Broadband Feasibility Study	2017	x					
Lincoln County Comprehensive Plan	2018						x[249]
Minneapolis 2040	2019	x	x	x	x		x[250]
Mt. Iron and Buhl, Executive Summary, Broadband Roadmap	2018	x					

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[246] Addresses tribally owned and operated internet service provider, Aaniin: "Continue the expansion and development of the Aaniin fiber-optic network."

[247] Stated goal: "Expand high-speed internet opportunities."

[248] Stated strategy: "Pursue broadband upgrades for the city throughout the city to enhance its competitive stance for social and economic development."

[249] Stated goal: "Encourage increased investments of telecommunications into the area."

[250] Refer to Policy 50.

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
Murray County Broadband Feasibility Study	2018	x					
Nicollet County Broadband Strategic Plan	2020	x					
Pope County Broadband Feasibility Study	2017	x					
Ramsey County and Saint Paul Connectivity Blueprint	2022	x	x	x	x		
Redwood County Economic Development Broadband Planning	2023	x					x[251]
Saint Louis County Comprehensive Land Use Plan	2019						x[252]
Sebeka Comprehensive Plan	2023						x[253]
Sherburne County Broadband Feasibility Study Report	2016	x					
Stearns County 2040 Comprehensive Plan	2020	x					
Traverse County Broadband Feasibility Study	2016	x					
Waseca County Broadband Strategic Plan	2020	x	x				

[251] Stated vision: Every resident and business in Redwood County will have access to an affordable, reliable, high-speed internet connection delivered by committed community partners skilled in operating and maintaining a successful fiber broadband network."
[252] This plan addresses broadband infrastructure relevant to disaster response: "Promote the expansion of broadband lines and wireless services, especially in remote forests that are susceptible to fire. Reliable mobile communication networks are essential for effective disaster response."
[253] Community-identified project: "Continue to find innovative ways to make broadband access more affordable."

Plan Title	Year	Broadband Availability	Objective 1	Objective 2	Objective 3	Objective 4	Other
[Wright County Broadband Assessment and Feasibility Study](#)	2021	x					

Appendix F | Rural/Urban Outliers

The State Digital Equity Planning Grant NOFO provides the following definition:

> The term *rural area* means any area other than: (1) A city or town that has a population of greater than 50,000 inhabitants; (2) Any urbanized area contiguous and adjacent to a city or town that has a population of greater than 50,000 inhabitants; and (3) In the case of a grant or direct loan, a city, town, or incorporated area that has a population of greater than 20,000 inhabitants.

Accordingly, the following list identifies Greater Minnesota cities that are not categorized as "rural" due to their population being greater than 50,000 inhabitants and/or their adjacency to a city that has a population greater than 50,000 inhabitants:[254]

- Duluth, extending to the adjacent cities of Hermantown and Proctor
- East Grand Forks, due to its shared border with Grand Forks, North Dakota
- Moorhead and Oakport, due to their shared border with Fargo, North Dakota
- Rochester
- St. Cloud, extending to the adjacent cities of Rockville, St. Augusta, Sartell, Sauk Rapids, and Waite Park

The following list identifies more Greater Minnesota not categorized as "rural" specifically for the case of grants or direct loans due to their populations exceeding 20,000. These cities may still be eligible for grants, albeit through an eligibility criterion other than rural:

Austin	Northfield	St. Michael
Elk River	Otsego	Willmar
Faribault	Owatonna	Winona

Additionally, the following list identifies Metro cities with populations not greater than 20,000 residents that are categorized as "rural" by the definition of *rural area* used in the NOFO:

Anoka County	Bethel, Centerville, Columbus, East Bethel, Ham Lake, Nowthen, Oak Grove, St. Francis (partial)
Carver County	Carver, Cologne, Hamburg, Mayer, New Germany, Norwood Young America, Victoria, Waconia, Watertown
Dakota County	Coates, Hampton, Miesville, New Trier, Randolph, Vermillion

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[254] ACS 5-Year Estimates, 2017–21.

Hennepin County	Excelsior, Greenfield, Greenwood, Hanover (partial), Independence, Long Lake, Loretto, Maple Plain, Minnetonka Beach, Minnetrista, Mound, Rockford (partial), Rogers, Spring Park, St. Bonifacius
Ramsey County	Arden Hills, Gem Lake, Little Canada, North Oaks, North St. Paul, Vadnais Heights, White Bear Lake
Scott County	Belle Plaine, Elko New Market, Jordan, New Prague (partial)
Washington County	Bayport, Birchwood Village, Dellwood, Grant, Hugo, Lake St. Croix Beach, Lakeland, Lakeland Shores, Mahtomedi, Marine on St. Croix, Oak Park Heights, Pine Springs, St. Mary's Point, Scandia, Stillwater, Willernie

Appendix G | Labeled List of Existing Strengths

The following list analyzes all existing strengths as articulated in Section 5.0. Each strength is categorized and labeled to facilitate a greater understanding of the factors at play. The eight strength labels are as follows:

- **Existing state policy, funds, and networks** foster digital opportunity.
- **Federal funds** complement state, local, and private dollars.
- MN's **public libraries** are known **as strong partners** in digital opportunity work.
- MN has a selection of homegrown **programs to bolster device access.**
- MN has tools to support residents' **digital skills.**
- **Grassroots advocates and local experts** eye a more digitally equitable future.
- More **digital navigator roles** are supporting more people.
- People are using technology in **achieving quality-of-life goals.**

Population	Existing Strength as Written	Label
Statewide	Minnesota is not new to broadband policy and deployment.	Existing state policy, funds, and networks
Statewide	Universal broadband access has been a state goal since 2010.	Existing state policy, funds, and networks
Statewide	Since 2014, the state legislature has directed over $380 million toward broadband infrastructure grants.	Existing state policy, funds, and networks
Statewide	Minnesota is pursuing Broadband Equity, Access, and Deployment (BEAD) Funds.	Federal funds
Statewide	Regional Library Telecommunications Aid (RLTA)[255] and Telecommunications/Internet Access Equity Aid (TEA)[256] help public libraries and K12 schools provide internet access.	Public libraries as strong partners
Statewide	The 2023 Minnesota legislature appropriated new funding for programs related to digital opportunity.	Existing state policy, funds, and networks

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[255] Minn. Stat. § 134.355.
[256] Minn. Stat. § 125B.26.

Population	Existing Strength as Written	Label
Statewide	Home internet subscription rates are slightly higher among Minnesotans than the national average.	Existing state policy, funds, and networks
Statewide	Minnesota is home to several nationally-recognized computer refurbishers supporting device ownership for individuals from low-income households.	Homegrown device access services
Statewide	Minnesota is a national leader in digital skills assessment.	Digital skills
Statewide	Statewide, Minnesota has 356 public library locations.	Public libraries as strong partners
Statewide	In 2021, Minnesota's public libraries supported 1,236,941 internet sessions on their public computers.	Public libraries as strong partners
Statewide	Minitex, a state-funded library organization, champions Minnesotans' access to information statewide.	Public libraries as strong partners
Statewide	Minnesota statute provides protocols for maintaining government-to-government relationships between the State of Minnesota and the 11 federally recognized tribes sharing this geography.	Existing state policy, funds, and networks
Statewide	The Governor's Task Force on Broadband provides expert cross-sector knowledge about digital opportunity.	Existing state policy, funds, and networks
Statewide	The Minnesota Cybersecurity Task Force contributes to the development of a statewide cybersecurity plan.	Existing state policy, funds, and networks
Statewide	The Minnesota Technology Advisory Council (TAC) advises MNIT and executive branch agencies on strategic information technology initiatives and service delivery.	Existing state policy, funds, and networks
Statewide	University of Minnesota Extension is a reputable skill-developer statewide.	Digital skills

Population	Existing Strength as Written	Label
Statewide	Many philanthropic foundations in Minnesota are digital opportunity supporters.	Grassroots advocates and local experts
Statewide	Multi-lingual digital navigators can provide trusted technology support in people's first languages.	Digital navigator roles
Statewide	Rural and urban communities alike see potential in digital navigator role.	Digital navigator roles
Rural	State funding for broadband deployment is improving high-speed internet availability in rural Minnesota.	Existing state policy, funds, and networks
Rural	Technology access keeps rural Minnesotans connected socially and economically across geographically dispersed communities.	Achieving quality-of-life goals
Rural	Vibrant communities of artists in Greater Minnesota can thrive with high-speed internet access.	Achieving quality-of-life goals
Rural	Counties and organizations in Greater Minnesota are developing new services to get internet-enabled devices in their residents' hands.	Programs to bolster device access
Rural	Some youth living in Greater Minnesota are gaining access to computer science skills outside of school.	Digital skills
Rural	Public libraries—and their knowledgeable staff—are essential.	Public libraries as strong partners
Rural	University of Minnesota Extension is a reputable skill-developer in rural communities.	Digital skills
Rural	CareerForce has 43 of its 55 locations in Greater Minnesota.	Existing state policy, funds, and networks
Rural	Minnesota's 1,780 township governments give rural residents political power.	Grassroots advocates and local experts
Rural	American Connection Corps (ACC) fellows embedded in rural communities tackle localized technology challenges.	Grassroots advocates and local experts

Population	Existing Strength as Written	Label
Modern Elders	Broadband subscriptions are increasing among adults ages 60-plus.	Achieving quality-of-life goals
Modern Elders	ACP can bring modern elders online.	Federal funds
Modern Elders	Computer ownership is rising among adults ages 60-plus.	Programs to bolster device access
Modern Elders	Numerous elder-serving organizations in Minnesota have expanded their services to include technology access. These include groups like African Community Senior Services, Gifts for Seniors, Mower County Seniors, Inc., and Senior Community Services.	Digital navigator roles
Modern Elders	AARP Minnesota is piloting new community technology outreach using Senior Planet.	Digital skills
Modern Elders	Age-Friendly Minnesota actively identifies strategies and collaborators to improve modern elders' quality of life outcomes via access to technology	Existing state policy, funds, and networks
Modern Elders	Adults ages 60-plus with disabilities—including late-onset disabilities like hearing or vision loss—can receive assistive technology services and support through several state agencies and offices.	Existing state policy, funds, and networks
Minoritized Races	Five of the 11 federally recognized tribes sharing the geography of Minnesota were recently awarded federal funding broadband infrastructure and use projects.	Federal funds
Minoritized Races	The Fond du Lac Band of Lake Superior Chippewa's internet service provider—Aaniin—provides fiber-to-the-home across Fond du Lac Nation.	Grassroots advocates and local experts
Minoritized Races	Four tribal colleges and tribal college libraries connect Indigenous students to culturally-grounded higher education.	Grassroots advocates and local experts

Population	Existing Strength as Written	Label
Minoritized Races	Numerous Asian–, Black–, Hispanic–, and Indigenous-led organizations in Minnesota have expanded their services to include technology access.	Digital navigator roles
Minoritized Races	The Black Broadband Summit and Family Broadband Coalition are Black-led initiatives focused on closing the digital divide in the Metro.	Grassroots advocates and local experts
Minoritized Races	The 93rd Minnesota Legislature is the most racially and ethnically diverse in the state's history.	Existing state policy, funds, and networks
Minoritized Races	The state ethnic councils are positioned to advise the state executive branch and legislature on digital opportunity issues affecting people from minoritized racial and ethnic groups.	Existing state policy, funds, and networks
Minoritized Races	An increasing number of Minnesotans from minoritized racial and ethnic groups are earning postsecondary certifications and degrees.	Achieving quality-of-life goals
Veterans	Veterans subscribe to broadband at comparative rates.	Achieving quality-of-life goals
Veterans	Veterans and military families receiving Veterans and Survivor Pension Benefits are eligible for ACP.	Federal funds
Veterans	Five veterans homes operated by the state provide wifi to their residents.	Existing state policy, funds, and networks
Veterans	For veterans seeking education and career skills the Minnesota GI Bill now includes expanded benefits.	Existing state policy, funds, and networks
Veterans	The Minnesota Veterans Application Tracking System (VATS) simplifies the process of applying for benefits and filing claims.	Existing state policy, funds, and networks
Veterans	The U.S. Department of Veterans Affairs supports veterans in receiving telehealth services.	Digital skills
Veterans	The MN Association of County Veteran Service Officers advocates for veterans' needs in all 87	Grassroots advocates and local experts

Population	Existing Strength as Written	Label
	counties; Tribal Veteran Service Officers do the same work with the 11 Native Nations.	
Veterans	Veterans with disabilities can receive assistive technology services and support through several state agencies and offices.	Existing state policy, funds, and networks
People with Disabilities	Broadband subscriptions are increasing among people with disabilities.	Achieving quality-of-life goals
People with Disabilities	People with disabilities receiving Supplemental Social Security Income are eligible for ACP.	Federal funds
People with Disabilities	Telehealth services, digital security systems, and web-based delivery services can help people with disabilities live more independently.	Achieving quality-of-life goals
People with Disabilities	Technology helps people with disabilities stay connected socially.	Achieving quality-of-life goals
People with Disabilities	Numerous organizations in Minnesota serving people with disabilities have expanded to include technology access.	Digital navigator roles
People with Disabilities	Several state agencies and offices provide assistive technologies and technical assistance for people with disabilities.	Existing state policy, funds, and networks
People with Disabilities	Staff at the Centers for Independent Living (CILs) provide comprehensive services to people with disabilities.	Existing state policy, funds, and networks
Incarcerated People	The state Omnibus Judiciary and Public Safety bill, signed into law at the end of the 2023 legislative session, includes language improving prisoner access to technology.	Existing state policy, funds, and networks
Incarcerated People	County jails are exploring digital options to help incarcerated parents stay connected to their children.	Achieving quality-of-life goals

Population	Existing Strength as Written	Label
Incarcerated People	The Minnesota Career Education Center (MCEC) provides Adult Basic Education (ABE) services at nine state prison locations.	Digital skills
Incarcerated People	The MN Department of Corrections provides tablets for all incarcerated students.	Programs bolstering device access
Incarcerated People	MCEC makes assistive technologies available to incarcerated students.	Achieving quality-of-life goals
Incarcerated People	State-supported partnering organizations connect people who are incarcerated and re-entering with digital skills training.	Digital navigator roles
Incarcerated People	College and vocational instructors provide training for information technology careers.	Achieving quality-of-life goals
Incarcerated People	CareerForce provides tailored services for justice-involved individuals.	Existing state policy, funds, and networks
Incarcerated People	ABE instructors teaching through MCEC provide digital skills instruction.	Digital skills
Incarcerated People	Organizations like Repowered support people who are re-entering in gaining work experience while developing technology skills.	Achieving quality-of-life goals
Language Barriers	Minnesota's most linguistically diverse communities are often located in areas with broadband access.	Achieving quality-of-life goals
Language Barriers	Households primarily speaking a language other than English are more likely to be digitally connected if K12 students reside there.	Grassroots advocates and local experts
Language Barriers	People can use technology to develop their English skills throughout their daily lives.	Achieving quality-of-life goals
Language Barriers	Technology is essential in helping immigrants and refugees stay connected to family, friends, and culture.	Achieving quality-of-life goals

Population	Existing Strength as Written	Label
Language Barriers	ACP resources are available in many languages.	Federal funds
Language Barriers	Public libraries are a frequent place people with limited English fluency and/or limited English literacy go to get internet access.	Public libraries as strong partners
Language Barriers	Numerous organizations serving people experiencing language barriers have expanded to include technology access.	Digital navigator roles
Language Barriers	MN Adult Basic Education (ABE) specializes in providing support for people building English fluency and/or English literacy skills	Digital skills
Low-Income	Local and tribal governments are running programs to keep low-income residents and tribal members connected.	Grassroots advocates and local experts
Low-Income	Some Minnesota cities offer city-wide public wifi.	Achieving quality-of-life goals
Low-Income	Public libraries in every Minnesota county provide free wifi and computer access	Public libraries as strong partners
Low-Income	ACP and the Lifeline Program reduce monthly internet costs for low-income households.	Federal funds
Low-Income	Some Minnesota-based organizations provide low-cost refurbished computers.	Programs bolstering device access
Low-Income	Staff at Minnesota's 24 Community Action Partnership (CAP) agencies alleviate poverty through access to resources and services.	Existing state policy, funds, and networks
Low-Income	Federal grants are boosting organizations doing ACP outreach	Grassroots advocates and local experts

Appendix H | Labeled List of Unsupported Necessities

The following list analyzes all unsupported necessities as articulated in Section 5.0. Each unsupported necessity is categorized and labeled to facilitate a greater understanding of the factors at play. The six labels are as follows:

- **Broadband infrastructure limitations** leave behind homes, businesses, and community anchors.
- **Lack of affordability** is a key factor in limiting broadband and mobile data subscription rates.
- **Lack of internet-enabled devices** that meet the users' needs force people offline.
- **Inadequate digital skills training** results in piecemeal services that are less likely to be accessible, responsive, and trusted.
- **Inadequate cybersecurity support** creates a sense of unease.
- **Limited staff capacity and resources** at many community organizations make it challenging to expand or evolve services.

Population	Unsupported Necessity as Written	Label
Statewide	Broadband access in Minnesota is not yet universal.	Broadband infrastructure limitations
Statewide	Household computer ownership is lower than household smartphone and tablet ownership.	Lack of internet-enabled devices
Statewide	Minnesota ranks last out of all states for its poor support for computer science curriculum in high schools.	Inadequate digital skills training
Statewide	Telehealth is a valuable but underutilized resource in communities of all types.	Inadequate digital skills training
Statewide	One-on-one technology assistance through community-based organizations is becoming more common, but funding is piecemeal overall.	Limited staff capacity and resources
Statewide	Minnesota Department of Education no longer includes digital equity as one of its priorities for federal Library Services and Technology Act (LSTA) funding.	Limited staff capacity and resources

Population	Unsupported Necessity as Written	Label
Statewide	Cyberbullying among Minnesota's students is persistent.	Inadequate digital skills training
Rural	Greater Minnesota residents are less likely to have a broadband subscription.	Limited broadband infrastructure
Rural	Greater Minnesota households are also more likely to have only a mobile data plan than Metro households.	Lack of affordability
Rural	Rural residents frequently cite challenges with slow internet speeds and unreliable service.	Broadband infrastructure limitations
Rural	Satellite and fixed wireless internet service can be made less reliable by weather fluctuations.	Broadband infrastructure limitations
Rural	A lower proportion of Greater Minnesota residents have enrolled in ACP.	Limited staff capacity and resources
Rural	Households in Greater Minnesota are less likely to have a laptop or desktop computer at home.	Lack of internet-enabled devices
Rural	Residents of Greater Minnesota need to travel farther to use a public library and have fewer library open hours available.	Limited staff capacity and resources
Rural	Rural residents are using telehealth services at a lower rate than urban residents.	Inadequate digital skills training
Rural	Greater Minnesota public libraries have significantly fewer staff than their Metro counterparts.	Limited staff capacity and resources
Modern Elders	Adults ages 60-plus adopt broadband at lower rates than adults under age 60.	Limited staff capacity and resources
Modern Elders	ACP enrollment rates are lowest among adults ages 65-plus.	Limited staff capacity and resources
Modern Elders	Broadband access in senior living and assisted care facilities is far from universal.	Broadband infrastructure limitations

Population	Unsupported Necessity as Written	Label
Modern Elders	Modern elders are left behind adults ages 18–59 in rates of laptop and desktop computer ownership.	Lack of internet-enabled devices
Modern Elders	Adults ages 60 and greater may also face barriers related to using outdated technology.	Lack of internet-enabled devices
Modern Elders	Smartphone use is low among modern elders.	Lack of internet-enabled devices
Modern Elders	Some modern elders report they do not know where to go for technology assistance or do not have the means to travel there.	Limited staff capacity and resources
Modern Elders	Adults ages 60-plus may be left to navigate the telehealth learning curve on their own.	Limited staff capacity and resources
Minoritized Races	Broadband subscriptions are less frequent among most people from minoritized racial and ethnic groups.	Lack of affordability
Minoritized Races	People from minoritized racial and ethnic groups are more often limited to mobile data only with no home broadband subscription.	Lack of internet-enabled devices
Minoritized Races	People from minoritized racial and ethnic groups are more likely to lose internet service for days at a time.	Lack of affordability
Minoritized Races	Rates of laptop and desktop computer ownership are lower for most people from minoritized racial and ethnic groups.	Lack of internet-enabled devices
Minoritized Races	People from minoritized racial and ethnic groups are more often limited to only a smartphone.	Lack of internet-enabled devices
Minoritized Races	Small businesses owned by people from minoritized racial and ethnic groups also experience these technology disparities.	Limited staff capacity and resources
Minoritized Races	Educators in Minnesota are overwhelmingly White.	Limited staff capacity and resources

Population	Unsupported Necessity as Written	Label
Minoritized Races	City and county government employees in administrative positions are less likely to be from minoritized racial and ethnic groups.	Limited staff capacity and resources
Veterans	Veterans own smartphones and laptops or desktops at lower rates than non-veterans.	Lack of internet-enabled devices
Veterans	While online applications for benefits streamline the process for many veterans, those lacking a device, reliable internet access, or digital skills are left behind.	Inadequate digital skills training
Veterans	The VA's expanded telehealth services and electronic medical records require specific digital skills.	Inadequate digital skills training
Veterans	Veterans returning from service may need upskilling or reskilling to find careers.	Inadequate digital skills training
Veterans	Veterans are more likely to need trauma-informed customer service.	Limited staff capacity and resources
Veterans	Veterans may feel misunderstood by healthcare workers and other service providers, especially in Greater Minnesota.	Limited staff capacity and resources
People with Disabilities	People with disabilities are less likely to have a broadband subscription.	Lack of affordability
People with Disabilities	Remote work options can give people with disabilities the flexibility they need to lead fulfilling careers, but only if they have adequate broadband at home.	Broadband infrastructure limitations
People with Disabilities	People with disabilities are less likely to have access to computers and smartphones.	Lack of internet-enabled devices
People with Disabilities	People with two or more disabilities experience even greater rates of digital exclusion.	Limited staff capacity and resources

Population	Unsupported Necessity as Written	Label
People with Disabilities	Government website compliance with accessibility standards is lacking.	Inadequate cybersecurity support
People with Disabilities	Public libraries, especially those in Greater Minnesota, may not be fully accessible or have assistive technologies available to patrons.	Limited staff capacity and resources
People with Disabilities	Organizations serving people with disabilities often cite short-staffing as significant limiter in their work.	Limited staff capacity and resources
Incarcerated People	Fewer re-entering individuals have access to home internet compared with the general population.	Lack of affordability
Incarcerated People	Re-entering individuals are less likely to have access to an internet-enabled device.	Lack of internet-enables devices
Incarcerated People	After time away from technology, incarcerated and re-entering individuals are more likely to have limited digital skills.	Inadequate digital skills training
Incarcerated People	Imperfect content filtering software sometimes blocks access to important information.	Inadequate cybersecurity support
Incarcerated People	Student to teacher ratios in MCEC ABE learning classrooms are imbalanced.	Limited staff capacity and resources
Language Barriers	People with limited English fluency and/or limited English literacy have a broadband subscription at levels lower than average.	Lack of affordability
Language Barriers	People with limited English fluency and/or limited English literacy are less likely to have a computer at home.	Lack of internet-enabled devices
Language Barriers	Technology classes focused on internet safety are in demand among adults with limited English fluency.	Limited staff capacity and resources
Language Barriers	Online privacy and safety are major concerns among immigrants with limited English fluency.	Inadequate cybersecurity support

Population	Unsupported Necessity as Written	Label
Language Barriers	Parents who are unfamiliar with technology due to language barriers express major concerns regarding their children's safe use of technology.	Inadequate cybersecurity support
Language Barriers	Internet service providers may not be prepared to provide customer service in a language not widely spoken in the U.S.	Limited staff capacity and resources
Language Barriers	In households where the primary language is not English, it is common for children to take on responsibilities assisting their parents with technology.	Inadequate cybersecurity support
Low-Income	People in low-income households are less likely to subscribe to broadband.	Lack of affordability
Low-Income	Households that cannot afford a contracted broadband subscription might use mobile data instead.	Lack of affordability
Low-Income	Low credit scores can limit which internet service providers and plans people can choose.	Lack of affordability
Low-Income	Missed internet service bills in the past can hinder future service.	Lack of affordability
Low-Income	ACP and Lifeline enrollment rates in Minnesota are below the national averages.	Lack of affordability
Low-Income	People in low-income households are more likely to own only a smartphone.	Limited staff capacity and resources
Low-Income	Owners of multi-dwelling units and owners of private manufactured home parks hold significant power over their tenants' and residents' choices for internet providers.	Lack of affordability

Appendix I | Labeled List of Systemic Challenges

The following list analyzes all systemic challenges as articulated in Section 5.0. Each challenge is categorized and labeled to facilitate a greater understanding of the harmful systems that hinder digital opportunity progress. The six challenge labels are as follows:

- Certain challenges are **given** and cannot be altered within the scope of this work.
- **Inequitable resource distribution** across local governments, tribal governments, and community-based organizations perpetuates systemic cycles of community poverty.
- **Limitations in state policy** must expand to affirm the value of digital opportunity initiatives.
- **Inequitable distribution of personal wealth** leads to the inequitable distribution of digital opportunities.
- **Infrastructure inequities** compound on other systemic challenges.
- **Digital skills training requires trust**, respect, accessibility, patience, care, strategy, persistence and creativity. Human connections are essential.

Population	Systemic Challenge as Written	Label
Statewide	Winter is a beast.	Given
Statewide	Some communities report difficulties with the Border-to-Border Broadband Development Grant Program.	Limitations in state policy
Statewide	Some communities report feeling held back by the state's broadband speed goals.	Limitations in state policy
Statewide	Fluctuating state funds for the Border-to-Border Broadband Development Grant Program can create uncertainty among un– and underserved communities.	Inequitable resource distribution
Statewide	Minnesota lacks statutory definitions for terms like "digital inclusion" and "digital opportunity."	Limitations in state policy
Statewide	Concepts relevant to digital opportunity are scattered throughout statute and session laws.	Limitations in state policy
Statewide	Minnesota statute lacks a mechanism to offset internet and device costs for low-income households.	Limitations in state policy

Population	Systemic Challenge as Written	Label
Statewide	Adequate state support for digital opportunity is unlikely to be sustainable without statutory changes.	Limitations in state policy
Rural	Greater Minnesota is more often un- or underserved by broadband compared to the Metro.	Infrastructure inequities
Rural	Limited competition among rural internet service providers reduces consumers' options.	Infrastructure inequities
Rural	Computer and device repair services can be difficult to come by in rural areas.	Inequitable resource distribution
Rural	Financial wealth accumulates in the Metro.	Given
Rural	The dominant narrative about Greater Minnesota sometimes leans into false stereotypes about rural life.	Given
Modern Elders	Modern elders frequently cite cybersecurity concerns as their reason for avoiding technology.	Digital skills training requires trust
Modern Elders	Modern elders on fixed incomes may struggle to budget for technology access.	Inequitable distribution of personal wealth
Modern Elders	Services for modern elders are sometimes designed without guidance from modern elders.	Digital skills training requires trust
Modern Elders	The dominant narrative on aging perpetuates harmful stereotypes about modern elders while reducing their perceived agency.	Given
Minoritized Races	People from minoritized racial and ethnic groups are more likely to experience poverty.	Inequitable distribution of personal wealth
Minoritized Races	Disparities in credit access and credit scores follow racial lines.	Inequitable distribution of personal wealth
Minoritized Races	Financial precarity contributes to housing instability.	Inequitable distribution of personal wealth

Population	Systemic Challenge as Written	Label
Minoritized Races	Owners of multi-dwelling units hold significant power over their tenants' and residents' choices for internet providers.	Infrastructure inequities
Veterans	Veterans on fixed incomes may struggle to budget for technology access.	Inequitable distribution of personal wealth
Veterans	Military service leaves invisible wounds that are not always met with care, patience, and respect.	Given
People with Disabilities	Accessible design is sometimes framed as an option rather than the necessity it is.	Inequitable resource distribution
People with Disabilities	People with disabilities are more likely to be on fixed incomes and/or experiencing poverty.	Inequitable distribution of personal wealth
People with Disabilities	For people with disabilities who work, lower median earnings make it challenging to afford costs for assistive technologies and internet service.	Inequitable distribution of personal wealth
People with Disabilities	Adults with disabilities may be unable to work full-time.	Inequitable distribution of personal wealth
Incarcerated People	Poverty disproportionately affects people who have been incarcerated and their families who may have been dependent on their income prior to incarceration.	Inequitable distribution of personal wealth
Incarcerated People	People who are incarcerated often have lower levels of educational attainment.	Inequitable distribution of personal wealth
Incarcerated People	Rates of unemployment are high among formerly incarcerated people.	Inequitable distribution of personal wealth
Incarcerated People	Imprisonment is dehumanizing and traumatic.	Given
Language Barriers	Minnesota residents born outside the U.S. are more likely to live below 150% of the poverty level.	Inequitable distribution of personal wealth
Language Barriers	Jargon is still jargon after it's translated.	Digital skills training requires trust

Population	Systemic Challenge as Written	Label
Language Barriers	Limited English fluency and literacy are significant vulnerabilities.	Digital skills training requires trust
Language Barriers	People new to the U.S. might be coming from a country where technology was restricted or unavailable.	Digital skills training requires trust
Language Barriers	People living with language barriers—especially parents whose tech-savvy children are online—are on high alert for scams and worry about online safety.	Digital skills training requires trust
Low-Income	Low-income households experience challenging income-to-broadband cost ratios.	Inequitable distribution of personal wealth
Low-Income	The future of ACP is unknown.	Given
Low-Income	Income– and cost-associated housing issues plus digital inequity plus employment challenges compound on one another in a dangerous cycle.	Inequitable distribution of personal wealth
Low-Income	People experiencing homelessness face the steepest systemic challenges to breaking this cycle.	Inequitable distribution of personal wealth
Low-Income	Residents of apartment buildings and other multi-dwelling units may experience technology challenges related to income and building ownership.	Infrastructure inequities
Low-Income	Residents of manufactured home parks experience similar issues as apartment residents.	Infrastructure inequities
Low-Income	"Affordability" depends on context.	Given

Appendix J | Crosswalk: Strengths, Necessities, Challenges, Populations, and Activities

The following table crosswalks activities from the implementation plan with every label discerned while analyzing the existing strengths, unsupported necessities, and systemic challenges across and among covered populations.

Each row can be understood as follows:

> [This activity] supports [these populations] while honoring [strength], alleviating [unsupported necessity], and confronting [challenge].

Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
3.1.1.A.a	Pilot a Digital Opportunity Leaders Network	All	Grassroots advocates and local experts	Limited staff capacity and resources	Inequitable resource distribution
3.1.1.A.b	Convene an inter-agency digital opportunity workgroup	All	Existing state policy, funds, and networks	Limited staff capacity and resources	Limitations in state policy
3.1.1.A.c	Expand DCC model of engagement	All	Grassroots advocates and local experts	Limited staff capacity and resources	Inequitable resource distribution
3.1.1.A.d	Retain DCCs	All	Existing state policy, funds, and networks	Limited staff capacity and resources	Inequitable resource distribution
3.1.1.B.a	Administer digital navigator grants to covered population orgs	All	Digital navigator roles	Inadequate digital skills training	Digital skills training requires trust
3.1.1.B.b	Administer grants to orgs serving	All	Digital skills	Lack of affordability	Digital skills training requires trust

Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
	covered populations		Public libraries as strong partners Achieving quality-of-life goals Programs to bolster device access	Inadequate digital skills training Lack of internet-enabled devices	Inequitable distribution of personal wealth
3.1.1.B.c	Research models for tech helpline	All, esp. Modern Elders	Existing state policy, funds, and networks	Inadequate digital skills training Inadequate cybersecurity support	Inequitable distribution of personal wealth
3.1.1.C.a	Support high schoolers in developing tech repair and tech assistance skills	All, esp. Rural	Digital navigator roles	Lack of affordability	Inequitable resource distribution Digital skills training requires trust
3.1.1.C.b	Administer grants for tech assessment for small businesses	All, esp. Rural, Minoritized Races	Achieving quality-of-life goals	Limited staff capacity and resources Broadband infrastructure limitations	Inequitable resource distribution Infrastructure inequities
3.2.1.A.a	Enhance staff capacity at OBD for data analysis	All	Existing state policy, funding, and network	Limited staff capacity and resources	Limitations in state policy

Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
3.2.1.A.b	Enhance maps at OBD	All	Existing state policy, funding, and network	Limited staff capacity and resources	Limitations in state policy
3.2.1.A.c	Enhance data collection at OBD	All	Existing state policy, funding, and networks	Limited staff capacity and resources	Limitations in state policy
3.2.1.A.d	Develop an OBD digital opportunity directory	All	Grassroots advocates and local experts	Limited staff capacity and resources	Digital skills training requires trust
3.2.1.B.a	Administer planning grants to municipalities, tribes	All	Achieving quality-of-life goals	Limited staff capacity and resources	Inequitable resource distribution
3.2.1.B.b	Administer data collection grants to municipalities, tribes	All	Achieving quality-of-life goals	Limited staff capacity and resources	Inequitable resource distribution
3.2.1.B.c	Lead a training series for municipalities, tribes	All, esp. Rural	Grassroots advocates and local experts	Limited staff capacity and resources	Inequitable resource distribution
3.2.1.C.a	Administer web accessibility assessment grants for municipalities, tribes	Disabilities, Language Barriers	Achieving quality-of-life goals	Limited staff capacity and resources	Inequitable resource distribution Inequitable distribution of personal wealth
3.2.1.C.b	Administer web accessibility re-design grants for	Disabilities, Language Barriers	Achieving quality-of-life goals	Limited staff capacity and resources	Inequitable resource distribution

Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
	municipalities, tribes				Inequitable distribution of personal wealth
3.2.1.C.c	Administer grants for PEG channels to enhance digital services	All, esp. Rural, Modern Elders, Disabilities	Grassroots advocates and local experts	Broadband infrastructure limitations	Infrastructure inequities
3.3.1.A.a	Enhance staff capacity for OBD ACP outreach	All, esp. Low-Income	Federal funds Achieving quality-of-life goals	Lack of affordability	Inequitable distribution of personal wealth
3.3.1.A.b	Foster housing partnerships	All, esp. Low-Income, Minoritized Races	Achieving quality-of-life goals	Broadband infrastructure limitations	Infrastructure inequities
3.3.1.A.c	Research models for state internet discount program like ACP	All, esp. Low-Income	Federal funds Achieving quality-of-life goals	Lack of affordability	Inequitable distribution of personal wealth
3.3.1.B.a	Research models for state device discount program	All, esp. Low-Income	Federal funds Programs to bolster device access	Lack of internet-enabled devices	Inequitable distribution of personal wealth
3.3.1.B.b	Research model for long-term device loans	All, esp. Low-Income	Programs to bolster device access Existing state policy, funding, and networks	Lack of internet-enabled devices	Inequitable distribution of personal wealth

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Activity	Brief Description of Activity	Populations Reached	Primary Strength(s) Honored	Unsupported Necessity Addressed	Challenge Confronted
3.3.1.C.a	Enhance re-entry supports for tech access	Incarcerated	Achieving quality-of-life goals	Lack of affordability Inadequate digital skills training	Inequitable distribution of personal wealth
3.3.1.C.b	Improve resources for refugees and immigrants	Minoritized Races, Language Barriers	Achieving quality-of-life goals	Limited staff capacity and resources	Digital skills training requires trust
3.3.1.C.c	Develop expanded tech services with CareerForce	All	Achieving quality-of-life goals	Inadequate digital skills training Inadequate cybersecurity support	Digital skills training requires trust
3.3.1.C.d	Administer competitive grants for orgs serving covered populations	All	All	All	All

Appendix K | Crosswalk: MN Plan vs. NOFO

The following table crosswalks the statutory and additional requirements outlined in the State Digital Equity Planning Grant NOFO with Minnesota's plan as presented.

MN Plan Section	NOFO Requirement	Description
5.2.3 5.3.3 5.4.3 5.5.3 5.6.3 5.7.3 5.8.3 5.9.3 Appendix I	IV.C.1.b.i.1	Identification of barriers to digital equity faced by Covered Populations in the State.
1.1.3 3.1.2 3.2.2 3.3.2 3.4 Appendix C Appendix D	IV.C.1.b.i.2	Measurable objectives for documenting and promoting, among each Covered Population located in that State— a. The availability of, and affordability of access to, fixed and wireless broadband technology; b. The online accessibility and inclusivity of public resources and services; c. Digital literacy; d. Awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and e. The availability and affordability of consumer devices and technical support for those devices.
6.2.1	IV.C.1.b.i.3	An assessment of how the measurable objectives identified in item 2 of this Section IV.C.1.b.i will impact and interact with the State's— a. Economic and workforce development goals, plans, and outcomes; b. Educational outcomes; c. Health outcomes; d. Civic and social engagement; and e. Delivery of other essential services.
6.1.1 6.1.2 6.1.3 6.2.2	IV.C.1.b.i.4	In order to achieve the measurable objectives identified in item 2 of this Section IV.C.1.b.i, a description of how the State plans to collaborate with key stakeholders in the State.

MN Plan Section	NOFO Requirement	Description
6.2.2 Appendix A Appendix B	IV.C.1.b.i.5	A list of organizations with which the Administering Entity for the State collaborated in developing the Plan.
1.1.1	IV.C.1.b.ii.1	A stated vision for digital equity.
5.1.2 5.2.2 5.3.2 5.4.2 5.5.2 5.6.2 5.7.2 5.8.2 5.9.2 Appendix C Appendix D Appendix G Appendix I	IV.C.1.b.ii.2	A digital equity needs assessment, including a comprehensive assessment of the baseline from which the State is working and the State's identification of the barriers to digital equity faced generally and by each of the covered populations in the State.
5.1.1 5.2.1 5.3.1 5.4.1 5.5.1 5.6.1 5.7.1 5.8.1 5.9.1 6.2.3 Appendix E Appendix G	IV.C.1.b.ii.3	An asset inventory, including current resources, programs, and strategies that promote digital equity for each of the covered populations, whether publicly or privately funded, as well as existing digital equity plans and programs already in place among municipal, regional, and Tribal governments.
6.1.1 6.1.2 6.1.3 6.2.2	IV.C.1.b.ii.4	To the extent not addressed in connection with item 4 of Section IV.C.1.b.i, a coordination and outreach strategy, including opportunities for public comment by, collaboration with, and ongoing engagement with representatives of each category of covered populations within the State and with the full range of stakeholders within the State.

MN Plan Section	NOFO Requirement	Description
6.2.2 Appendix E	IV.C.1.b.ii.5	A description of how municipal, regional, and/or Tribal digital equity plans will be incorporated into the State Digital Equity Plan.
3.1 3.2 3.3 3.4 6.1 6.2.2 Appendix C Appendix D Appendix G Appendix I	IV.C.1.b.ii.6	An implementation strategy that is holistic and addresses the barriers to participation in the digital world, including affordability, devices, digital skills, technical support, and digital navigation. The strategy should (a) establish measurable goals, objectives, and proposed core activities to address the needs of covered populations, (b) set out measures ensuring the plan's sustainability and effectiveness across State communities, and (c) adopt mechanisms to ensure that the plan is regularly evaluated and updated.
3.1 3.2 3.3 Appendix I	IV.C.1.b.ii.7	An explanation of how the implementation strategy addresses gaps in existing state, local, and private efforts to address the barriers identified pursuant to Section IV.C.1.b.i, item 1, of this NOFO.
6.1.1 6.1.2 6.1.3	IV.C.1.b.ii.8	A description of how the State intends to accomplish the implementation strategy described above by engaging or partnering with: a. Workforce agencies such as state workforce agencies and state/local workforce boards and workforce organizations; b. Labor organizations and community-based organizations; and c. Institutions of higher learning, including but not limited to four-year colleges and universities, community colleges, education and training providers, and educational service agencies.
4.1 4.2 6.1.1 6.1.2 6.1.3	IV.C.1.b.ii.9	A timeline for implementation of the plan.
6.3	IV.C.1.b.ii.10	A description of how the State will coordinate its use of State Digital Equity Capacity Grant funding and its use of any funds it receives in connection with the Broadband Equity, Access, and Deployment Program, other federal or private digital equity funding.

Appendix L | OBD's Revisions in Response to NTIA's Recommendations

Requirement as Named by NTIA	NTIA Recommendation[257]	OBD's Revisions and Responses
Statutory Requirement 1	It is possible other intersections could be identified and explored.	Yes, it is possible. OBD anticipates delving more into this once the State Digital Equity Capacity grants become available.
Statutory Requirement 2	At least one measurable objective must be included for all 8 covered populations located in the state for all sub-items.	The following sections were added: 1.1.3, 3.1.2, 3.2.2, 3.3.2, 3.4. Appendix C and D were revised. Explanatory components were incorporated in the introduction to Section 3.0.
Statutory Requirement 3	The state-wide goals that were identified should connect more directly with the measurable objectives that are used for each covered population.	Sections 3.1.2, 3.2.2, and 3.3.2 were revised. This is also clarified in revisions made in Appendix C and Appendix D.
Statutory Requirement 4	The DCCs are identified, as are the hosts, but the makeup of the DCCs is not described.	This cannot be provided. To ensure privacy and foster trust, OBD did not track individual DCC composition or makeup. This was intentional from the project's onset.
	Engagement otherwise appears to be focused primarily on state government agencies.	Appendix B has been expanded to include all organizations and agencies with which OBD met in some planning capacity.
Statutory Requirement 5	Elaborate on the other organizations that make up the DCCs.	This cannot be provided.

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[257] Text in this column is excerpted from the recommendations NTIA emailed to OBD on the final day of the public comment period.

Requirement as Named by NTIA	NTIA Recommendation[257]	OBD's Revisions and Responses
	Identify which covered populations each organization or entity represents and/or serves.	DCCs provided this information on a voluntary basis when registering with OBD. Their responses when available have been integrated into Appendix A.
	If the organizations represented by the DCCs are too numerous, descriptions and in particular, examples, should be included.	Every DCC submitting data to OBD is cited throughout the plan. Along with the revisions to Appendix A, these citations that include direct quotations, statistics, and other quantitative and qualitative measures should be sufficient as examples of the breadth and depth of coverage the DCCs represent.
Programmatic Requirement 6	The vision needs to define digital equity within the context of the state. It is also recommended that the vision be time-bound.	Light revisions were made to the vision statement.
Programmatic Requirement 7	The elements related to the baselines are very solid, but their relation to the measurable objectives needs to be aligned.	This is clarified through revisions to Sections 3.1.2, 3.2.2, and 3.3.2. This is also clarified in Appendix C and Appendix D.
Programmatic Requirement 8	The state is encouraged to expand on these strengths, as the basic program requirements call for "a full and accurate listing" of all assets.	OBD supplemented "asset" with "existing strengths" to account for intrinsic value, including the value of people coming together to solve systemic problems. The existing strengths listed throughout Section 5.0 of this plan have been consolidated in Appendix G.
	The plan also needs to identify DE plans and programs among municipal, regional, and tribal governments. The plans were included, but further elaboration on the programs carried out	This is clarified in content added to Section 6.2.3 and in modifications made to Appendix E.

Requirement as Named by NTIA	NTIA Recommendation[257]	OBD's Revisions and Responses
	by these entities is encouraged, if applicable.	
Programmatic Requirement 9	The plan does not include a coordination and outreach strategy that covers public comment, collaboration, and ongoing engagement to the extent required by the NOFO.	Sections 6.1.1 and 6.1.2 were expanded to clarify timelines, incorporate public comment options, and directly address covered populations.
Programmatic Requirement 10	The element that is missing is how [other state agency plans] will be incorporated into the DE plan.	The table in Section 6.2.1 was expanded to list relevant activities aligned with each plan.
Programmatic Requirement 11	The measurable objectives are included in the plan, though not entirely connected to the core activities in implementation.	This is clarified through revisions to Sections 3.1.2, 3.2.2, and 3.3.2 and through the addition of Section 3.4. Alignment charts were added in Appendices G, H, I, and J.
	It is recommended to be more explicit about measures to ensure plan sustainability and mechanisms for updating and evaluating the plan.	Annual calendars were added to Sections 6.1.1, 6.1.2, and 6.1.3. Clarifications were made regarding workgroup composition in 6.1.2.
Programmatic Requirement 12	There appear to be few explicit mentions of how the implementation strategy will address the gaps in state, local, and private efforts to address the barriers to DE faced by the covered populations.	This was added in Appendix J.
Programmatic Requirement 13	Explore further the elements required in this requirement, such as explicitly describing how the workforce entities, labor organizations and CBOs, and institutions of higher learning will be engaged and partnered with to accomplish implementation.	This information was incorporated into Sections 6.1.1 and 6.1.2.

Requirement as Named by NTIA	NTIA Recommendation[257]	OBD's Revisions and Responses
Programmatic Requirement 14	It is recommended to examine the model plan guidance as it relates to this section, particularly the requirement to demonstrate a realistic, actionable, and measurable implementation timeline. It is also recommended to look at the timelines developed in other states' plans, though only for inspiration on how they are using visualizations.	OBD finds it is not possible to create a wholly realistic, actionable, or measurable timeline in the absence of a known start date for the State Digital Equity Capacity Grant program. To make good use of resources, OBD will work with DEED's in-house graphic designers once NTIA has approved final plan content.
Programmatic Requirement 15	There is natural collaboration that is expected, as BEAD and DE are both operated out of the same office in Minnesota, but further description on how the coordination will be done is necessary. In addition, coordination with other federal and private funding (if applicable) is required in this section.	Additional details were added to Section 6.3. OBD has no additional state, federal, or private funding at its disposal for digital opportunity work at this time.
Programmatic Requirement 16	Incorporate public comments into future versions of the plan.	This was added to Section 2.2.

Appendix M | Definitions

ACP: *see* Affordable Connectivity Program

Affordable Connectivity Program: a program overseen by the Federal Communications Commission providing internet services discounts of $30/month (or $75/month for households in Native Nations) for households meeting certain low-income requirements

Aging individual: *see* modern elder

Broadband: "high-speed internet access that is always on and faster than traditional dial-up access. Broadband includes several high-speed transmission technologies, such as fiber, wireless, satellite, digital subscriber line and cable. For the Federal Communications Commission (FCC), broadband capability requires consumers to have access to actual download speeds of at least 25 Mbps and actual upload speeds of at least 3 Mbps" (NTIA)

Covered household: "a household, the income of which for the most recently completed year is not more than 150 percent of an amount equal to the poverty level, as determined by using criteria of poverty established by the Bureau of the Census" (NOFO)

Cybersecurity: "the art of protecting networks, devices, and data from unauthorized access or criminal use and the practice of ensuring confidentiality, integrity, and availability of information" (CISA)

Device: a computing object that can send, receive, store, and process information; this includes but not limited to desktop computers, laptop computers, tablets, and smartphones

Digital equity: "the condition in which individuals and communities have the information technology capacity that is needed for full participation in the society and economy of the United States" (NOFO)

Digital Equity Act: a federal act that "provides $2.75 billion to establish three grant programs that promote digital equity and inclusion. They aim to ensure that all people and communities have the skills, technology, and capacity needed to reap the full benefits of our digital economy" (NOFO)

Digital inclusion: "the activities that are necessary to ensure that all individuals in the United States have access to, and the use of, affordable information and communication technologies, such as—
    a. Reliable fixed and wireless broadband internet service;
    b. Internet-enabled devices that meet the needs of the user; and
    c. Applications and online content designed to enable and encourage self-sufficiency, participation, and collaboration; and
2. Includes—
    a. Obtaining access to digital literacy training;
    b. The provision of quality technical support; and
    c. Obtaining basic awareness of measures to ensure online privacy and cybersecurity" (NOFO)

Digital literacy: "the skills associated with using technology to enable users to find, evaluate, organize, create, and communicate information" ([NOFO](#))

Digital opportunity: *see* digital equity

Digital skills: *see* digital literacy

Disability: "with respect to an individual, 1. a physical or mental impairment that substantially limits one or more major life activities of such individual; 2. a record of such an impairment; or 3. being regarded as having such an impairment" ([NOFO](#))

English fluency: the degree to which an individual can use the English language to create something that communicates meaning, such as a sentence, a paragraph, a poem, or a story

English literacy: the degree to which an individual can comprehend and make meaning out of the written English language

Fixed wireless internet service: a type of broadband internet service that uses radio waves to transmit a signal from a designated tower to a designated receiver antenna that's been installed in a fixed location

Language barrier: a communication challenge arising out of limitations in English fluency and/or English literacy

Mobile internet service: a type of internet service that uses radio waves to transit a signal from an available tower to a designated mobile device, like a smartphone or a hotspot

Modern elder: "an individual who is 60 years of age or older" ([NOFO](#))

Public library: "any library that provides free access to all residents of a city or county without discrimination, receives at least half of its financial support from public funds" ([Minn. Stat. § 134.001](#))

Regional public library system: "a multicounty public library service agency that provides free access to all residents of the region without discrimination" ([Minn. Stat. § 134.001](#))

Rural area: "any area other than: (1) a city or town that has a population of greater than 50,000 inhabitants; (2) any urbanized area contiguous and adjacent to a city or town that has a population of greater than 50,000 inhabitants; and (3) in the case of a grant or direct loan, a city, town, or incorporated area that has a population of greater than 20,000 inhabitants" ([NOFO](#))

Veteran: "a person who served in the active military, naval, air, or space service, and who was discharged or released therefrom under conditions other than dishonorable" ([NOFO](#))

Wireless internet service: *see* fixed wireless internet service

Wireline internet service: internet service provided via a physical line, like copper or fiber optic cabling, that connects the internet provider's network directly to the premise of a home or business

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Appendix O | Written Comments: Overview

Written public comments on the draft plan were accepted via mail and through an online form from Monday, August 21 to Friday, September 29, 2023. In this span of time, 66 comments were received from the following entities:

- 32 self-represented individuals
- AARP
- Ameelio
- American Public Media Group
- Arrowhead Economic Opportunity Agency
- Benton Foundation
- Beyond Media Solutions
- Blandin Foundation
- Carlton-Cook-Lake-St. Louis County Community Health Board
- Carver County
- City of Columbia Heights (prepared and submitted by Bradley Werner Attorneys at Law)
- City of Coon Rapids (prepared and submitted by Bradley Werner Attorneys at Law)
- City of Duluth
- City of Minneapolis (prepared and submitted by Bradley Werner Attorneys at Law)
- City of Saint Louis Park
- City of Saint Paul
- Comcast
- Compudopt
- Consolidated Telephone Company (CTC)
- Digitunity
- EducationSuperHighway
- Gifts for Seniors
- Hennepin County
- Hennepin County and Ramsey County (joint submission)
- Hennepin County Library
- Kandiyohi County
- League of Minnesota Cities
- Legacy Adult Daycare Center
- Literacy Minnesota (2 different submissions received)
- Mid-Minnesota Regional Development Commission
- Minnesota Department of Education
- Minnesota Department of Human Services
- North Metro Telecommunications Commission (prepared and submitted by Bradley Werner Attorneys at Law)

- North Suburban Communications Commission (prepared and submitted by Bradley Werner Attorneys at Law)
- Northwest Suburbs Cable Communications Commission (prepared and submitted by Bradley Werner Attorneys at Law)
- Ramsey County
- South Washington County Telecommunications Commission (prepared and submitted by Bradley Werner Attorneys at Law)
- Urban Strategies, Inc.
- Windstream

Appendix P | Written Comments: Full Text

Public comments received in writing are presented in this section. Redactions to names and email addresses have been made as needed to protect the privacy of self-represented individuals.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #1]
Email	[removed]
Zipcode	56011
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	2: Planning Process: The Minnesota Model
Comment regarding the Digital Opportunity Plan	Although I have access to Broadband connectivity it is shared so evenings of after 3 pm or before 8:00 am you are unable to get reliable internet service. In addition my zip code does reflect a "city" connection where a variety of plans and vendors offer service. However, outside of the city limits, this is not the case. Maybe we get one vendor and limited connectivity less than 25mbps at a high rate that again is shared. Even mobile phone service is not always reliable or not available by popular vendors.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Adrianne Furniss
Email	afurniss@benton.org
Zipcode	60091
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	1: Introduction

Comment regarding the Digital Opportunity Plan

One key requirement of state digital equity plans is that they include a state's vision of digital equity. The National Telecommunications and Information Administration (NTIA) suggests that digital equity visions address at least these two questions:
1. What will digital equity look like in the context of your state?
2. What are the broad goals that should be accomplished in executing this plan (e.g., improve rural health outcomes, increase underrepresented youth employment in technology-related fields)?

NTIA has specifically advised states to "lead with equity," intentionally identifying, amplifying, and centering the voices of those most affected by the digital divide and disconnected communities.

With the extraordinary task and responsibility of state policymakers and local communities in mind, the Benton Institute for Broadband & Society launched the Visions of Digital Equity project to aid both in ensuring that more community voices are heard in crafting visions that increase opportunity for all.

Through surveys, community meetings, interviews, conversations, and a collaborative writing process with community contributors, we have arrived at a set of principles to help guide both the process and the resulting visions of digital equity.

We learned that a well-crafted vision of digital equity has the potential to be very powerful. It can:
• Offer a glimpse of a state transformed by universal connectivity,
• Provide a roadmap and resources for the digital inclusion efforts to come, and
• Act as a north star for goal setting, planning, and implementation efforts over the months and years to come.

The best visions of digital equity will be community centered and focused on creating change, specific and clearly articulated, and ambitious but attainable.

The Benton Institute for Broadband & Society reviewed Minnesota's DRAFT Digital Opportunity Plan and shared a summary of it with our readers (see https://www.benton.org/blog/what-digitally-equitable-minnesota-could-look-and-how-get-there)

Upon review, we offer 10 Principles for Digital Equity Visions (see https://www.benton.org/sites/default/files/VisionsDigitalEquity.pdf). We hope these principles help the people of Minnesota evaluate both the DRAFT Digital Opportunity Plan and the Office of Broadband Development's revision of the plan. To that end, we also offer A Checklist for Evaluating Digital Equity Visions: https://www.benton.org/sites/default/files/DEV_checklist.pdf

Thank you for the opportunity to weigh in on the plan; I would be happy to answer any questions or discuss the potential of Minnesota's vision for digital equity.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Scot Henley
Email	scot@digitunity.org
Zipcode	03860
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan

Congratulations on completing the draft of Minnesota's Digital Equity Plan! As a national nonprofit organization focused on the device ownership aspect of digital equity, we are delighted to see device access as a priority within Minnesota's plan. Everyone who needs a computer should have one.

This is a watershed moment for advancing digital equity. We offer this feedback as a means to share our unique perspective, leveraging nearly 40 years of work on the issue of device ownership, a national lens into how states are approaching the issue, and our role in administering a nationwide practitioner network. We are truly and sincerely vested in your success.

First, we would like to emphasize three overarching points:

Large screen device ownership: Owning a computer is crucial for thriving in the modern economy. Those without a computer are unable to harness the vast opportunities that the internet provides, such as employment, education, telehealth, commerce, finance, communication, and much more. Personal device ownership provides a unique computing experience that cannot be replicated through public use of computers or shared devices and mobile devices limit opportunity. (Please see "The Importance of Large-Screen Device Ownership," November 2021, Amy L. Gonzales, University of California, Santa Barbara, available here). Large screen devices such as laptops, desktops, Chromebooks, and tablets, are critical for a full and equitable computing experience.

Sustainability: While short-term gains are possible, our collective efforts must aim for sustainable solutions that far outlast this five-year federal investment. Building a plan around merely making grants to procure devices would be shortsighted, missing this landmark opportunity to create comprehensive change. Instead, we must develop solutions that transform the way corporate, government, and institutional IT assets are managed at scale. Repurposing previously used technology for community support can make computer ownership more accessible. Technology reuse is a practical and environmentally friendly solution for expanding device ownership.

Device quality and intended use: Affordable devices must be reliable; quantity cannot replace quality. It is also critical that the choice of device matches a recipient's intended use and context. While less expensive devices may be a quick win within a limited budget, a healthy device ecosystem will provide economical solutions that meet the full range of recipients' needs.

Regarding Minnesota's Digital Equity Plan, we offer the following specific feedback and recommendations:

Kudos!: We're happy to see the inclusion of the goal of "increasing the

proportion of people from covered populations with laptop or desktop computers." The plan's recognition of the need for accessible and affordable device repair is also great, as well as the innovation towards potentially developing a state program to offset device costs.

Aim high: Working to ensure that all members of Covered Populations own a large screen device is achievable. The plan has several strong building blocks toward achieving this goal and we encourage the state to continue to strive for device ownership for all who need it.

Ecosystem approach: To ensure that all Minnesotans have the ability to obtain a free or low cost computer, establishing a robust supply of applicable devices through accessible, resilient, community-level distribution systems is critical. Systems thinking is required, with active involvement from a diverse range of actors and stakeholders. Digitunity's Methodology for a Sustainable Device Ecosystem provides a framework for addressing this issue on a large scale. The draft plan identifies several components of a device ecosystem, however, intentional coordination and a holistic approach should be planned for in order to realize maximum impact, leverage additional resources, and reduce duplication.

Local plans: Given that there was no mention of device ownership in most of the local plans, additional probing, analysis, and education is needed with communities to ensure that their needs are represented and the understanding of what a device ecosystem can enable is established. Their increased awareness will surely bring additional expertise, resources, and engagement to device solutions for their communities.

Refurbishing: As noted, Minnesota is home to a number of nonprofit technology refurbishers who are also members of Digitunity's practitioner network, known as the Alliance for Technology Refurbishing and Reuse (AFTRR). Refurbishing is a key component of a device ecosystem and necessitates a strong emphasis on technical skills and expertise, particularly to guarantee the secure handling of data. It also requires working with certified vendors to ensure that e-waste is responsibly handled and that the entire process is financially viable. It's important to note that in December 2022, Digitunity helped to pass the federal Computers for Veterans and Students Act which will soon direct repairable federal computers to nonprofit technology refurbishers across the country. Minnesota could be a beneficiary of this program. It is important to understand the capacity, scalability, and quality of service that each refurbisher provides in the state and to address any gaps or deficiencies. We caution against identifying any single vendor, whether nonprofit or for-profit, as the statewide refurbishing solution. A sustainable device ecosystem leverages a broad range of assets to serve community members best.

Support for device deployment: Deployment is a critical component of a sustainable device ecosystem. This involves a multi-step, multifaceted

process and it is essential that skills training and technical support are tightly integrated in the acquisition of a device. For deployment, we highly recommend that trusted community organizations with specific training and support regarding device deployment be engaged to help residents obtain and use devices. Intentional effort should be placed on developing a deployment network through community-based organizations, with formalized connections made between device sources in populated hubs and rural deployment points.

Connecting supply to deployment: Digitunity has a longstanding online technology donation matching platform that connects the supply of new and refurbished devices to vetted community organizations for deployment. This is a critical and often overlooked part of the overall device ecosystem, and we'd be happy to share more about this with the state.

Technical support: The establishment of school tech repair programs is unique and we look forward to learning more about this work. We are curious as to the reach and capacity of the program and how it integrates into workforce development initiatives and funding. It's also important to note that refurbishers and device suppliers often provide robust technical support services including the provision of device warranties.

Digital Navigators: Digitunity recently sponsored a small scale research project regarding Digital Navigators and their capacity to help their clients acquire/obtain devices. Their effectiveness was largely dependent on the free or low cost device options available locally, as well as their training regarding device options. The study found that several Digital Navigators relied on their own prior knowledge about device procurement and some even advised clients to go to large box retail stores to obtain a device.

Device discount program: We commend the state for looking at alternatives to the Affordable Connectivity Program (ACP), especially since the future of the program is uncertain. The "take rate" for devices in the ACP has been extremely low particularly because many ISP's don't offer devices as part of the program and that is the only way to access the benefit. The devices that are offered through the ACP subsidy are often low grade tablets. Other approaches to offering a device subsidy have stalled in Congress. We would welcome the opportunity to work with the state on the design of a device discount program.

Loaning vs. owning: It is noted in the draft plan the goal to "prepare a report that explores a sustainable state-managed system for circulating large screen devices as long-term loans through collaborating public programs." While loaning programs and providing device access via school or library computer labs could serve as a stop-gap measure, true equity is when residents have full access to the devices that meet their needs. Loaning programs typically require transportation to a location to pick up and return the device, as well as the restricted use of the device. Evidence shows that people who have unlimited access to a device increase their digital literacy

skills more quickly than those with restricted access. We highly recommend a measurable objective based on device ownership, not periodic access to a device.

Public-private partnerships: The role that the business and philanthropic community can play in a device ecosystem is often transformative. They can play key roles in supporting a robust supply of free and low cost devices that can be made available for Covered Populations. We recommend development of a strategy to engage them in this plan.

Evaluation: We strongly recommend that performance indicators should be more robust than simply tracking the number of devices distributed, and could include establishing and monitoring the performance of components within the device ecosystem, as well as the breadth, composition, and resilience of the ecosystem itself.

Leveraging the support of outside entities, such as Digitunity or other national actors engaged in this work, could help speed and inform the implementation process and enhance the capacity investments made in Minnesota's local practitioners, stakeholders, and government departments. We firmly believe that with a shared vision, engagement of non-traditional partnerships, and creative approaches, there are ample resources available to significantly increase device ownership, both now and in the years beyond this federal investment.

We wish you great success in this important endeavor.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #2]
Email	[removed]
Zipcode	55812
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	Handout: Executive summary
Comment regarding the Digital Opportunity Plan	Referring to Indigenous Peoples as "minoritized racial and ethnic groups" is complicated, yeah? Do you have someone indigenous helping you with terminology? Indigenous people (and their relationship with the state) are defined by treaty, unlike other minoritized racial and ethnic groups.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #3]
Email	[removed]
Zipcode	55417
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	1: Introduction
Comment regarding the Digital Opportunity Plan	Laying any physical fiber or cable is going to be a big waste of money for remote and rural areas. That will require ongoing upkeep and maintenance, and will become antiquated very soon. My suggestion is to invest in satellite internet for remote areas, like Starlink or a similar provider, which enables immediate high speed internet for ANY remote area, as far off the grid as needed. The only thing needed is power, which can be provided by solar.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Legacy Adult Daycare Center
Email	swu@hhcare.net
Zipcode	55427
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity

Comment regarding the Digital Opportunity Plan

To whom it may concern,

Health Care Plus, Inc. provides adult day services through Heartland Adult daycare and Legacy adult daycare center. We served Chinese, Hispanic/Latinx, Russian, Vietnamese seniors. At this time, we have 467 registered seniors, many are Limited English Proficiency (LEP) members.

One of the urgent needs for our seniors is to connect with resources, and supporting them with a healthy living environment. About half of our seniors do not have iPads and are unable to purchase them due to limited incomes. Health Care Plus has been approved by DHS to provide remote services for our clients. The seniors would greatly be benefited by having a device such as an iPad as this would allow them access to online services and aid them with program participation. iPad also gives them the ability to communicate with one another face to face. We are hoping that our seniors can get help with getting iPads so that they can stay connected both in person and remotely.

As the Center director for 14 years, I see how technology has changed our ways of connecting, and the COVID pandemic although a crisis for all, but did expand how services can be delivered online. While we continue to emphasize the importance of in-person contacts, and involving seniors in diverse group services, we also see how the technology can improve their lives, with easier and quicker access to services online.

We understand the State's Digital Inclusion Plan process, please take into consideration and set aside fundings to support seniors to purchase iPads, with the devices not only increasing their ability to access online services, but support the freedom that seniors deserve to get the services at the time/place/way they choose to.

Your favorable consideration of our request would be much appreciated!! Thank you.

Sincerely yours,

Sally Wu
Center Director

Is there an additional section you would like to comment on?

No

Optional: Do you identify with any of the following covered populations?

Adults Age 60+
People from Minoritized Racial/Ethnic Groups
People with Disabilities
People with limited English speaking or reading skills
People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #4]
Email	[removed]
Zipcode	55418
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation
Comment regarding the Digital Opportunity Plan	Please ensure you use a sliding income scale for any financial assistance or opportunities instead of the usual hard and fast demarcation line. In other words, make a benefit that slides instead of "you're in, your out" based on income. The usual system is unfair to many people just getting by, leaving a system where the poorest end up better off than those of marginally higher incomes because the "working poor" are often not eligible for handouts and thus end up worse off than others. Health care, food aid and current tech programs are examples of this unfair system. Use a sliding benefits system, not an "all or nothing."
	Also, ensure that ALL get access to the free help from ISPs, not just "new" people, as you state. ISPs have provided no customer service whatsoever to existing customers, so they need to bring everyone up to speed now. Don't leave some people behind just because they were trying to be self sufficient. Don't penalize people.
	Basically, in a nutshell, programs like these marginalize the "working poor" by helping only the poorest of the poor (such as those already receiving government funds) "raise their boat," leaving the working poor's boat sunken below.
Optional: Do you identify with any of the following covered populations?	Adults Age 60+ People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	DHS State of Minnesota
Email	ami.nafzger@state.mn.us
Zipcode	55155
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	Handout: Executive summary
Comment regarding the Digital Opportunity Plan	Would like to review
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+ People from Minoritized Racial/Ethnic Groups People with Disabilities People who are Incarcerated or Re-Entering Society People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #5]
Zipcode	55435
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #6]
Zipcode	55408
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #7]
Zipcode	55429
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #8]
Zipcode	55422
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #9]
Zipcode	55408
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #10]
Zipcode	55337
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #11]
Zipcode	55337
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #12]
Zipcode	55378
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund Ipads for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #13]
Zipcode	55102
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #14]
Zipcode	55446
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #15]
Zipcode	55343
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #16]
Zipcode	55435
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #17]
Zipcode	55126
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #18]
Zipcode	55337
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #19]
Zipcode	55420
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #20]
Zipcode	55109
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We would need the government to fund iPads or translation machine for us (seniors) to use.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #21]
Email	[removed]
Zipcode	55904
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	We have had 4 concerned seniors who have received renewal letters for internet service ...contact us for help in filling in paperwork for renewal. Not a simple process to renew
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+ People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	EducationSuperHighway
Email	jenny.miller@educationsuperhighway.org
Zipcode	80303
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation

Comment regarding the Digital Opportunity Plan

BACKGROUND

Approximately 28 million households in the United States do not have high-speed broadband. Seventeen million of these households are offline because they cannot afford an available internet connection. This broadband affordability gap has become one of the primary inhibitors of access to economic security and opportunity. It is a reality centered in our nation's poorest communities and disproportionately impacts people of color. The Affordable Connectivity Program (ACP) can connect millions of unconnected households. Achieving national best practice ACP adoption rates can significantly accelerate closing the broadband affordability gap, connecting two-thirds of the 17 million households impacted by this gap. States should use Digital Equity Act plans and funding to implement key strategies to increase ACP adoption.

The impact of the ACP can be felt equally across partisan lines, with participation rates nearly identical in Republican (31.2% of eligible households) and Democrat states (30.8%). Our analysis of ACP enrollment data also shows that both rural and urban households benefit greatly from the program, with 13% of rural households and 15% of households in metro or urban areas enrolled in the ACP.

Millions of eligible households are not taking advantage of the program as they are unaware that the ACP exists. Surveys of low- and lower-middle-income households have found that in some communities, up to 75% of eligible households are unaware that they might be eligible for federal broadband benefits. Trust in the program is another critical barrier, as many eligible households are concerned about sharing personal information as part of the enrollment process. Finally, enrollment barriers such as application accessibility, language assistance, and documentation challenges necessitate direct support for a portion of eligible households that cannot complete the enrollment process independently.

Broad outreach alone often fails to build the trust needed to drive people to action and should be paired with outreach and enrollment support from trusted sources such as government agencies that administer benefit programs, school districts, community health centers, faith leaders, community-based organizations, and businesses they regularly interact with. These organizations have existing relationships with eligible households, know the most effective time, place, and manner to increase awareness in the communities they serve, and have established outreach channels such as in-person community events, digital marketing, emailing, phone banking, text messaging, physical information distribution and posters in high-traffic target areas. Furthermore, they provide trusted space and avenues to support enrollment in the ACP, and can help mitigate some of the challenges households face when they enroll.

COHORT MODEL

To overcome the complex barriers that keep under-resourced households offline, EducationSuperHighway (ESH) believes that state leaders should take action to convene a state-wide ACP-focused cohort that brings together these critical trusted institutions, leveraging Digital Equity Act funds to enable outreach to and support for unconnected households. At a micro level, the cohort will provide a collective framework to ensure the creation and sustainability of an ecosystem of organizations and stakeholders working on digital equity initiatives, with a particular focus on the ACP. At a macro level, this work can provide a model for what state-wide ACP implementation could look like, as well as confirm the most effective role that the state may play in supporting future capacity or competitive grant-funded recipients in alignment with Digital Equity Plans.

The cohort should consist of a series of workshops intended to promote ways in which leveraging the ACP contributes to achieving digital equity across the state. To facilitate this, ESH can provide pro bono co-facilitation of the cohort and serve as a subject matter expert and technical advisor, providing its expertise to the cohort community. This group should strive to create a collaborative space where organizations can learn from and inform one another's work across the state. It should also promote coordination and collaboration between the state and other stakeholders, alleviating the unintentional creation of silos, gaps, and/or redundancies in programming.

To date, ESH has partnered with broadband offices in several states to implement the cohort model and equip FCC grant recipients, as well as other digital equity-minded and focused organizations, with foundational knowledge on the ACP and how leveraging this program contributes to achieving digital equity across the state. This includes: 1) how the ACP operates; 2) tools, training, and resources with respect to awareness and enrollment activities and tactics; 3) the intricacies of cross-sector partnerships and campaign execution; and 4) best practices for implementing digital and on-the-ground ACP campaigns.

Roles & Responsibilities
State Broadband Offices and their staff are uniquely positioned to lead the creation and facilitation of a statewide ACP Cohort. In order to ensure an effective and streamlined cohort implementation, a Broadband Office staff member should be designated to lead the cohort engagement. It is also a best practice to include additional staffing resources with a focus on communications, who can assist with managing state-led communications, campaigns, messaging and awareness initiatives related to the cohort. A critical element of the state's role will be to incentivize motivation and participation, and states should set an ACP enrollment goal in order to achieve this that is measurable and can be used to regularly assess progress and course-correct where appropriate.

Objectives and Programming
The main objective of the ACP Cohort is to combine the expertise and experience of key institutions, organizations, and stakeholders to make a

larger impact on the state's most unconnected communities. An important output of this cohort should be to increase ACP enrollment across the state. Through the creation of curated resources and programming, and a series of workshops, the cohort should:

1. Create a forum for knowledge sharing, including an understanding of current ACP-related work across the state through guest speakers and cohort member updates
2. Share lessons learned and emerging best practices
3. Address common barriers
4. Provide opportunities for cohort members to support and reinforce one another
5. Supplement and leverage needed resources where possible (i.e., cross-posting marketing outreach and sharing digital equity advocate personnel)
6. Create a pipeline for future funding opportunities, including identifying funding intermediaries that can help expand the funds' reach and impact by supporting smaller and less resourced organizations, to ensure that key state organizations can contribute to ACP adoption

In closing, the creation of a statewide ACP-focused cohort will serve to ensure that mechanisms for increasing broadband affordability and connecting unconnected households remain a cornerstone of the state's Digital Equity Plan. The cohort will secure cohesion between the state's plan, the execution of their capacity grant funds, and alignment with the ecosystem of competitive grant funded institutions to create the conditions for successful ACP adoption statewide.

Digital Equity Plan Guidance
Accelerating ACP Adoption in Minnesota

Model Language To Make a State-Supported Affordable Connectivity Program (ACP) Cohort Part of Your Digital Equity Plan.

The Affordable Connectivity Program (ACP) is a critical tool for closing the digital divide.

As states draft their Digital Equity plans, many are looking to increase adoption of the ACP as a critical metric to measure their success. By convening cohorts of trusted local organizations to raise awareness of the ACP and support enrollment, states can successfully leverage the program to achieve the commitments of their digital equity plans.

State-supported ACP cohorts support digital equity and internet affordability.

A state-supported ACP cohort model brings together a sustainable ecosystem of stakeholders working on digital equity initiatives. These trusted stakeholders – such as libraries, schools, housing authorities, faith-based, tribal, or community-based organizations — have existing relationships with ACP-eligible households – yet many do not have the resources to implement programming that supports sustained ACP awareness and enrollment. Digital Equity Act (DEA) funding can address this gap.

A sustainable ecosystem of stakeholders working on digital equity initiatives.

A series of workshops will create a collaborative space where organizations can learn from and inform each other's work. The group will promote coordination, alleviating the unintentional creation of silos, gaps, and redundancies in programming. Participating organizations will be equipped with tools and resources to help their communities overcome barriers to ACP adoption.

BARRIER 1

Low awareness of the ACP benefit amongst eligible households

BARRIER 2

Lack of trust in government benefit programs or ISPs

BARRIER 3

Challenges with the ACP sign-up and enrollment process

EducationSuperHighway provides pro-bono support.

Our team of experts will provide pro-bono co-facilitation and serve as subject matter experts and technical advisors to the cohort community. Our partners in cities such as Birmingham, Baltimore, Philadelphia, San Francisco, and Wilmington have seen ACP adoption rates grow 94% faster than their state averages and 174% faster than the national average.

Contact
Get in touch to use our model language to make a state-supported ACP cohort part of your Digital Equity plan.

Tim Alborg
Director of Government Affairs
tim.alborg@educationsuperhighway.org

State-supported ACP cohorts enable Digital Equity Act requirements.

An ACP cohort should be embedded in the state Digital Equity plans as a key mechanism to promote internet affordability by ensuring these crucial stakeholders are engaged and included.

Capacity grant funding should also be used to support state broadband offices and other agencies in facilitating and overseeing this work and supporting future capacity or competitive grant-funded recipients in alignment with its Digital Equity Plan vision.

Early adopters of EducationSuperHighway's state cohort model, including North Carolina and Oregon, are supporting FCC grant recipients, as well as other digital equity-minded and focused organizations, with a foundational knowledge of the ACP and how leveraging this program contributes to achieving digital equity across the state.

Key actions to convene and mobilize a state-supported ACP cohort

Plan — **Mobilize** — **Execute**

Plan
- Use our **model language** to make ACP a cornerstone of the DEA plan.
- Identify a **goal around ACP enrollment**.
- Develop a **statewide Digital Equity ecosystem**.
- Conduct **stakeholder mapping** to ensure organizations representing diverse populations are involved.

Mobilize
- Mobilize **digital equity-minded organizations**.
- Invite **organizations to participate** in the cohort.
- Include **state agencies** and departments, especially those who can support documentation access for ACP enrollment.

Execute
- Schedule the **workshop series**.
- Share EducationSuperHighway's **tools and resources** with cohort members.
- Establish and bolster state awareness and **communication channels**.
- Use the forum to:
  - Share **knowledge and best practices**.
  - Address **common barriers**.
  - Supplement and leverage needed **resources**.
- Track **progress** against the Digital Equity Plan and goals.

Our Mission

EducationSuperHighway is a national non-profit with the mission to close the digital divide for the 17 million households that have access to the internet but can't afford to connect. From 2012-2020 we led the effort that closed the classroom connectivity gap, connecting 49 million students to high-speed internet in schools.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Collins Oppong/Beyond Media Solutions
Email	collinsbeyond@gmail.com
Zipcode	55429
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	The Digital Equity Act certainly requires a thorough statewide review of digital inclusion, and it's great to note the work of OBD to include the assessments of eight different categories that may have lower rates of digital inclusion due to structural difficulties. These populations that include covered households, people who are elderly, people who are incarcerated (aside from those in federal correctional facilities), people who are disabled, people who face language barriers or low literacy levels, people who belong to racial or ethnic minority groups, and people who live primarily in rural areas are important segments of our populations that are often overlooked in the overall process of digitization. While considering the current state of Digital Opportunity, it's also important to understand that, even though these groups are being separately addressed in the plan, these population groups also frequently intersect and overlap. Taking this possibility into consideration is very important in aloocating the right support and opportunities.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People from Minoritized Racial/Ethnic Groups

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Mary Jo George
Email	mgeorge@aarp.org
Zipcode	55104
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	2: Planning Process: The Minnesota Model

Comment regarding the Digital Opportunity Plan

AARP MN would like to submit the following comments. We will follow up with a written letter by mail which includes the footnotes. THANKS.

August 15, 2023

Office of Broadband Development
Attn: Digital Opportunity Plan
Great Northern Building
180 5th St. E
St. Paul, MN 55101

To Whom It May Concern:

On behalf of our nearly 620,000 members statewide, AARP Minnesota appreciates the opportunity to comment on Minnesota's Office of Broadband Development (OBD) Draft Equity Plan. We want to thank OBD for inviting public comment on its draft Plan, which allows for written and in-person comments on an issue of far-reaching significance to all Minnesotans. AARP commends OBD for offering many opportunities for citizens and stakeholders to contribute to the state's digital equity plan and implementation of that Plan, and we anticipate attending one or more listening sessions.

AARP also appreciates the OBD invitation to stakeholders to establish a "Digital Connection Committee" and to register it with OBD in order to (1) receive and share planning updates from OBD and (2) "connect with digital inclusion advocates statewide." AARP looks forward to collaborating with digital inclusion advocates statewide in the months ahead.

OBD's efforts to solicit feedback and to offer Minnesotans easy ways to participate are impressive. Minnesota stands out for the "approachability" of OBD's plan, the ease of use of OBD's website, and the fact that OBD presents many ways for stakeholders to get and stay involved with the state's pursuit of digital equity.

Overall, AARP believes the Plan is well-written, user-friendly, comprehensive, practical, and visionary. The Plan will provide a useful roadmap for making progress toward achieving digital equity for all Minnesotans. The Plan also reflects extensive research, information, and data, and is also grounded in the voices of Minnesotans. AARP offers additional feedback below.

Observations and Comments about Minnesota's Draft Digital Equity Plan

Accessibility/Readability of Plan
At the outset, AARP commends OBD for including on the Plan's cover page: "Upon request, this material will be made available in an alternative

format such as large print, Braille, or audio recording." This is not a message that consistently appears on states' draft digital equity plans. Yet, the message is important to signal OBD's interest in soliciting feedback from all populations.

The sections within the Plan begin with quotes from Minnesotans who participated in focus groups. This anchoring of potentially dense subject matter in the voices of Minnesotans helps to make the Plan accessible and relevant. Reflecting a tone of collaboration and inclusiveness, OBD states:

To be clear, this is not OBD's digital opportunity plan for Minnesota. Rather, this plan belongs to Minnesota. This is Minnesota's digital opportunity plan, and it has been OBD's immense privilege to be the public steward charged with piecing it together.

The Plan integrates a focus on the human aspect of digital equity. For example, after providing a comprehensive definition of digital equity (based on NTIA's NOFO), the Plan aptly and succinctly states: "Absent from this definition but absolutely essential are trust, relevance, and safety. These conditions must be present in order for any individual to adopt technology in ways that are meaningful to them." AARP fully concurs that "trust, relevance and safety" are key, including for older adults, and also echoes the Plan's emphasis on people rather than technology."

Goals
AARP fully supports the Plan's three goals (Connect People to People, Connect People to Information, and Connect People to Resources). Under Goal 3.1.1.2, AARP suggests language be added to encourage growing relationships with proven digital skills providers in the community and to recognize the important role Community Anchor Institutions (CAIs) play in this space.

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Among other things, AARP appreciates the Plan's emphasis on the importance of access by all to information and data. Among the subsidiary parts of the second goal ("Connect People to Information") are:

 "(1) Minnesotans can access comprehensive data and mapping tools to evaluate digital opportunity in their area as well as statewide. (2) All

Minnesota cities, counties, and tribes have the opportunity to create localized data-driven digital opportunity plans to support their residents and tribal members. (3) All city, county, and tribal government units have the opportunity to re-design their websites so that they are fully accessible to people with disabilities and people with limited English literacy skills."

AARP has long advocated for data-driven policymaking and program implementation: data and information can guide the Plan's implementation and shed light on the state's progress in achieving objectives.

On Goal 3.3.1.2, AARP suggests including an evaluation of the long-term effects of having a large-screen device or smartphone to help improve the model for a statewide device discount program. On Goal 3.3.1.3, AARP suggests including older adults as one of the specified populations to forge new opportunity pathways. This could explore further collaborations with Minnesota's aging community within state and local government, including the Governor's Council on Age-Friendly Minnesota.

Anchored in Broader Context
The Plan acknowledges the existence of larger policy gaps and problems regarding high-speed internet access and the corresponding need for regulatory reform but then moves on without describing potential reform. Acknowledging the larger regulatory context is important - because, of course, any state's ability to achieve digital equity is directly affected by state and federal policy. The Plan states:

This plan exists in the middle of a particular kind of tension between what is permissible and what is needed. The gaps in digital opportunity that many individuals confront daily are often a consequence of long-term gaps in federal, state, and local policy that have allowed people to be left behind. For gaps to be closed in the long-term, new federal, state, and local policies need to be in place. Without addressing the inequities built into this system, the same gaps will remerge and persist. It is, however, outside of the purview of OBD to independently recommend policy changes, serve as a regulatory body, or propose regulatory reform.

Understanding that this is beyond the scope of the Plan, AARP nonetheless voices its support for any necessary regulatory reform, including defining digital equity, and is hopeful that the Minnesota State Legislature addresses policy gaps so that digital equity goals can be achieved more efficiently.

Also, the Plan adopts three terms that differ from those in the Digital Equity Act ("assets" becomes "existing strengths"; "needs" becomes "unsupported necessities"; and "barriers" becomes "systemic challenges"). By clarifying the terms, the Plan aptly clarifies the constraints and goals of achieving digital equity, contributing to a clearer analysis and discussion of relevant issues.

The swapping out of terms is also consistent with the Plan's acknowledgment that broader societal issues affect digital equity, which the Plan simply can't address/resolve but is nonetheless important to recognize. (No digital equity plan can in and of itself overcome underlying systemic challenges.) For example, the Plan explains:

"Needs" suggests a limited deficit with a fulfillment-based solution. "Unsupported necessities" highlights the enduring nature of inequity, the complexity of remediation, and the role of systemic supports in fostering sustainable change.

"Barriers" places the onus to overcome on the individual who has been digitally excluded, oftentimes outside of their own control. "Systemic challenges" acknowledges that public policy and system design underlie and reinforce many barriers.

The Plan explains further: "The choice to rename allows this plan to acknowledge Minnesotans' past and current digital resilience and resourcefulness while addressing how systemic changes can create a more equitable future."

Addressing Covered Populations
The Plan addresses separately each of the covered populations and also importantly recognizes that the individual populations overlap:

Identity is complex and overlapping. While each of these covered populations is addressed separately in this plan, this separation is entirely artificial. It is very conceivable for any person to fit into more than one of these stated categories and/or to exist within and across different categories during different phases of their life. Moreover, no group of people is a monolith. Within each category are countless valid ways of living, knowing, and being.

Through its previously created Digital Connection Committees (in January 2023), OBD has already created a strong foundation for collaboration among diverse populations and stakeholders. OBD plans for the number of such committees to increase to broaden public input yet further.

Coordination with Infrastructure Deployment
The Plan describes solid coordination within Minnesota between digital equity planning and BEAD planning - both funding sources are administered by OBD. Among other things, "[d]uring the digital opportunity plan public comment period, infrastructure staff will accompany digital equity staff at as many public meetings as feasible."

The Plan appropriately connects digital equity goals with infrastructure

grants, stating, for example: "Collaborate with internet service providers who are receiving state and federal infrastructure funds to ensure newly connected households understand the basics of cybersecurity." Older adults are often targets of internet-based scams, so AARP fully supports efforts to coordinate cybersecurity education with internet access deployment: privacy and safety are key concerns of older adults.

Affordability/Digital Skills/Technical Support

The Plan's goals of increasing enrollment by 2028 in the ACP and the Lifeline Program to 70% (from baseline measures of 27.9% and 12.9%, respectively) are important and ambitious. AARP stands ready to assist Minnesota with outreach for these two programs (or any successor programs). At the federal level, AARP is actively advocating for the continuation of the ACP, which, as the Plan recognizes, is running out of funds.

The Plan also recognizes the precariousness of internet access: "Affordability creates a certain digital precarity that can result in a person having full access to technology one day and no access the next." In its description of objectives and activities to enable people to access resources, the Plan includes specific measures that address AARP's long-standing concerns (for example, the importance of affordable equipment - having internet access through a laptop or desktop computer rather than through a smartphone; digital skills and technical support; ability to identify and to mitigate cybersecurity risks).

In discussing the low-income population as defined by the Digital Equity Act, the Plan aptly observes:

Regarding individuals above 150% of the poverty level as wholly separate from those below 150% of the poverty level is ultimately a reductive activity. Even as some households will never move above or below 150% poverty, many will experience life on both sides of this invisible line. Moreover, income alone is an imperfect metric for determining poverty. Households with income above 150% poverty facing high essential expenses (often related to healthcare, childcare, rising food costs, and transportation) may experience a net financial strain akin to poverty without being able to access services and supports that are designated for low-income households.

AARP concurs fully with this observation. AARP has been a long-time advocate of affordable high-speed internet access for all. Many older adults who do not qualify for ACP and Lifeline may be unable to afford internet access and the necessary equipment to support that access. For this reason, AARP welcomes the Plan's intention: "Although the Digital Equity Act limits poverty measurements to income, this section of Minnesota's digital opportunity plan also strives to recognize the net financial challenges faced by more than one-third of Minnesota's

residents."

Importance of Data-Driven, Informed Policy Making and Program Implementation
As stated earlier, AARP wholeheartedly supports the goal of transparency and widespread access to data. The Plan states in this regard:

Making data and information readily available allows for collaboration and informed decision-making, empowering communities to bridge the digital divide and fully utilize the resources offered by technology. By championing accessibility, this goal simultaneously ensures that everyone has an equal opportunity to benefit from digital availability of information.

Assessment of Existing Digital Strengths and Unsupported Digital Necessities
The Plan includes a comprehensive assessment of strengths and unsupported necessities as well as of systemic challenges that impede digital opportunities. This includes statewide assessments as well as assessments specific to each of the covered populations. For example, relative to rural areas:
As of July 10, 2023, Minnesota's largely urban 3rd, 4th, and 5th Congressional districts had enrollment rates [for ACP] of 23%-34% among eligible households. At the same time, Minnesota's rural 1st, 7th, and 8th districts had enrollment rates of 18%-25%. A 2023 survey by the MN Department of Health found that 82% of rural Minnesotans reported reliable enough internet access for video telehealth compared to 91% of Minnesotans in urban areas.

Affordability and access to health care by rural residents are critical goals for AARP, so AARP appreciates the Plan's inclusion of relevant benchmarks in rural areas relative to both metrics.

Adults Aged 60 and Over
The Plan observes that about 24% of Minnesotans-1,348,000 people-are ages 60 and over, and this percentage has been steadily increasing. This population, of course, overlaps with the other covered populations, which the Plan recognizes at the outset. This overlap means, in turn, that differing approaches may be needed to help achieve digital equity within the population of older adults, depending on whether they also live in rural areas, lack English proficiency, are veterans, have disabilities, etc.

The Plan includes comprehensive data about older adults (regarding, for example, the distribution of older adults among different living situations and levels of voter turn-out, workforce engagement, and volunteering), which affects digital equity planning. AARP wholeheartedly agrees with OBD that:

Technology access is essential in ensuring Minnesota's older adults can age with support, care, dignity, and independence. It also plays an important role in improving their long-term quality of life outcomes.

Moreover, the Plan includes a comprehensive discussion of existing digital strengths for older adults, unsupported digital necessities for older adults, and systemic challenges impeding adoption. For example, one of the unsupported digital necessities (i.e., areas for improvement) concerns health care, an issue of great importance to AARP members: "About half of healthcare providers responding to a survey by MN Department of Health observed 'disparities in broadband access, digital literacy, and comfort with using technology ... are particularly salient for patients with a lower socioeconomic status, elderly patients, and patients living in remote locations.'"

AARP appreciates OBD's acknowledgment of AARP's Senior Planet Program, which provides technology classes for seniors, both in-person and online, and the Governor's Council on Age-Friendly report that recognizes broadband as a basic need.

Among the systemic challenges are budget constraints and the fact that "[s]ervices for older adults are sometimes designed without guidance from older adults," and the "dominant narrative on aging perpetuates stereotypes about older adults while reducing their perceived agency." AARP suggests the Plan expound on societal factors, namely ageism, as one important issue undermining internet adoption by older adults and recommends that it be moved to the introductory paragraph.

Another unsupported digital necessity acknowledged by the Plan concerns isolation. This is another priority area for AARP as many older adults deal with isolation, and some experienced extreme isolation during the COVID pandemic.

AARP suggests additional focus be placed on digital skills development of older adults. While the Plan appropriately calls for a measure in Section 3.1.2, objective 2, to reflect the number of individuals reached through expanded and new digital skills programs, Section 5.3 might describe the need and solution in greater detail, given how important this area is for older adults. Establishing an appropriate baseline for this objective will be very important. Some states have proposed digital skills surveys as one method to accomplish this. Employing this approach can make it easier to measure progress in the coming years.

AARP further suggests the Plan call for utilizing emerging best practices in the field of digital skills development (e.g., multi-week courses to grow trust and community with this population).
And that, if available, any information regarding the 60+ population

re-entering the workforce via technology training programs be included in Section 5.3.1 as a digital strength.

AARP appreciates the effort that OBD has made to become familiar with the specific and unique benefits of and challenges to older adults' adoption and use of high-speed internet access, as well as OBD's recognition that older adults are not a homogenous group.

Conclusion

AARP commends OBD for its well-researched, thoughtful, and comprehensive draft digital equity plan. AARP also commends OBD for offering Minnesotans and stakeholders (as part of the preparation of the draft plan and afterward) ample opportunities for contributing to the State's planning for and achievement of digital equity.

In conclusion, the Plan is practical, realistic, and ambitious, describing constraints over which the State has no control (such as winters, which are a "beast" (rolling out infrastructure in frozen ground is not easy!), strengths that the State can build off of, unsupported necessities that merit attention, and systemic issues that, although beyond the scope of a digital equity plan, need to be recognized as impediments to progress.

Above all, it is a Plan built upon listening to Minnesotans and one that demonstrates a commitment to future collaboration among Minnesotans. AARP looks forward to reviewing the final Minnesota Digital Equity Plan and contributing to OBD's plans and programs in the coming years. If you have questions or wish to discuss this matter further, please don't hesitate to contact me at cmcleer@aarp.org or 65e1-726-5640.

Sincerely,

Cathy McLeer
State Director, AARP Minnesota

Is there an additional section you would like to comment on?   No

Optional: Do you identify with any of the following covered populations?   Adults Age 60+

1919 University Avenue W., Suite #500 | Saint Paul, MN 55104
1-866-554-5381 | Fax: 651-644-5539 | TTY: 1-877-434-7598
aarp.org/mn | aarpmn@aarp.org | twitter: @aarpmn
facebook.com/AARPMinnesota

August 15, 2023

Office of Broadband Development
Attn: Digital Opportunity Plan
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Observations and Comments about Minnesota's Draft Digital Equity Plan

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[1] See Appendix A for a list of the digital connection committees established to date.

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[2] The Plan states: "Digital connection depends on human connection. As such, OBD's intention with these three goals is to center people—not things—in all digital opportunity planning, activities, and solutions. Affordable internet access, access to devices, and digital skills support are all essential tools in advancing digital opportunity; people create the systems that make the meaningful use of these tools possible."

Among other things, AARP appreciates the Plan's emphasis on the importance of access by all to information and data. Among the subsidiary parts of the second goal ("Connect People to Information") are:

> "(1) Minnesotans can access comprehensive data and mapping tools to evaluate digital opportunity in their area as well as statewide. (2) All Minnesota cities, counties, and tribes have the opportunity to create localized data-driven digital opportunity plans to support their residents and tribal members. (3) All city, county, and tribal government units have the opportunity to re-design their websites so that they are fully accessible to people with disabilities and people with limited English literacy skills."

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> This plan exists in the middle of a particular kind of tension between what is permissible and what is needed. The gaps in digital opportunity that many individuals confront daily are often a consequence of long-term gaps in federal, state, and local policy that have allowed people to be left behind. For gaps to be closed in the long-term, new federal, state, and local policies need to be in place. Without addressing the inequities built into this system, the same gaps will remerge and persist. It is, however, outside of the purview of OBD to independently recommend policy changes, serve as a regulatory body, or propose regulatory reform.

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[3] AARP recommends Digital Connection Committee members be asked to provide input or review curriculum deployed through state agencies.

The Plan appropriately connects digital equity goals with infrastructure grants, stating, for example: "Collaborate with internet service providers who are receiving state and federal infrastructure funds to ensure newly connected households understand the basics of cybersecurity." Older adults are often targets of internet-based scams, so AARP fully supports efforts to coordinate cybersecurity education with internet access deployment: privacy and safety are key concerns of older adults.

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[4] Presently, more than half (53.6%) of ACP participants access the internet through mobile broadband, which, in AARP's view, provides an inferior form of internet access relative to fixed broadband. https://www.usac.org/about/affordable-connectivity-program/acp-enrollment-and-claims-tracker/additional-acp-data/ site visited August 25, 2023.

Importance of Data-Driven, Informed Policy Making and Program Implementation

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Affordability and access to health care by rural residents are critical goals for AARP, so AARP appreciates the Plan's inclusion of relevant benchmarks in rural areas relative to both metrics.

Adults Aged 60 and Over

The Plan observes that about 24% of Minnesotans—1,348,000 people—are ages 60 and over, and this percentage has been steadily increasing. This population, of course, overlaps with the other covered populations, which the Plan recognizes at the outset. This overlap means, in turn, that differing approaches may be needed to help achieve digital equity within the population of older adults, depending on whether they also live in rural areas, lack English proficiency, are veterans, have disabilities, etc.

The Plan includes comprehensive data about older adults (regarding, for example, the distribution of older adults among different living situations and levels of voter turn-out, workforce engagement, and volunteering), which affects digital equity planning. AARP wholeheartedly agrees with OBD that:

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Moreover, the Plan includes a comprehensive discussion of existing digital strengths for older adults, unsupported digital necessities for older adults, and systemic challenges impeding

6

adoption.[5] For example, one of the unsupported digital necessities (i.e., areas for improvement) concerns health care, an issue of great importance to AARP members: "About half of healthcare providers responding to a survey by MN Department of Health observed 'disparities in broadband access, digital literacy, and comfort with using technology ... are particularly salient for patients with a lower socioeconomic status, elderly patients, and patients living in remote locations.'"

AARP appreciates OBD's acknowledgment of AARP's Senior Planet Program, which provides technology classes for seniors, both in-person and online, and the Governor's Council on Age-Friendly report that recognizes broadband as a basic need.

Among the systemic challenges are budget constraints and the fact that "[s]ervices for older adults are sometimes designed without guidance from older adults," and the "dominant narrative on aging perpetuates stereotypes about older adults while reducing their perceived agency." AARP suggests the Plan expound on societal factors, namely ageism, as one important issue undermining internet adoption by older adults and recommends that it be moved to the introductory paragraph. [67]

Another unsupported digital necessity acknowledged by the Plan concerns isolation. This is another priority area for AARP as many older adults deal with isolation, and some experienced extreme isolation during the COVID pandemic.

AARP suggests additional focus be placed on digital skills development of older adults. While the Plan appropriately calls for a measure in Section 3.1.2, objective 2, to reflect the number of individuals reached through expanded and new digital skills programs, Section 5.3 might describe the need and solution in greater detail, given how important this area is for older adults. Establishing an appropriate baseline for this objective will be very important. Some states have proposed digital skills surveys as one method to accomplish this. Employing this approach can make it easier to measure progress in the coming years.

AARP further suggests the Plan call for utilizing emerging best practices in the field of digital skills development (e.g., multi-week courses to grow trust and community with this population).[8] And that, if available, any information regarding the 60+ population re-entering the workforce via technology training programs be included in Section 5.3.1 as a digital strength.

AARP appreciates the effort that OBD has made to become familiar with the specific and unique benefits of and challenges to older adults' adoption and use of high-speed internet access, as well as OBD's recognition that older adults are not a homogenous group.

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[5] The Plan is similarly comprehensive regarding other covered populations; in these comments, AARP focuses primarily on older adults.
[6] *The Effect of Ageism on the Digital Divide Among Older Adults.* 2016. Access at https://www.detroitseniorsolution.org/app/uploads/2022/02/McDonough_The-Effect-of-Ageism-on-the-Digital-Divide-Among-Older-Adults.pdf
[7] *An Inconvenienced Youth? Ageism and its Potential Intergenerational Roots*, 2012. Access at https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3838706/
[8] *The Digital Inclusion of Older Adults during COVID-19: Lessons from a Case Study of Older Adults Technology Services (OATS).* April 2022. Access at https://pubmed.ncbi.nlm.nih.gov/33882782/

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Conclusion

AARP commends OBD for its well-researched, thoughtful, and comprehensive draft digital equity plan. AARP also commends OBD for offering Minnesotans and stakeholders (as part of the preparation of the draft plan and afterward) ample opportunities for contributing to the State's planning for and achievement of digital equity.

In conclusion, the Plan is practical, realistic, and ambitious, describing constraints over which the State has no control (such as winters, which are a "beast" (rolling out infrastructure in frozen ground is not easy!), strengths that the State can build off of, unsupported necessities that merit attention, and systemic issues that, although beyond the scope of a digital equity plan, need to be recognized as impediments to progress.

Above all, it is a Plan built upon listening to Minnesotans and one that demonstrates a commitment to future collaboration among Minnesotans. AARP looks forward to reviewing the final Minnesota Digital Equity Plan and contributing to OBD's plans and programs in the coming years. If you have questions or wish to discuss this matter further, please don't hesitate to contact me at cmcleer@aarp.org or 65e1-726-5640.

Sincerely,

Cathy McLeer
State Director, AARP Minnesota

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #22]
Email	[removed]
Zipcode	55987
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	I would like to see help for the homeless. I am also disabled and continously here there is going to be monies available for Winona. It would be nice if when I go downtown I could at least be able to get in to some of the shops and other establishments without calling the phone number to help me get in. Could defray shopping and losing money. More places should be handicap accessible. Don't see those monies being used for this. Thank you Also bullying on the busses.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas People with Disabilities People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #23]
Email	[removed]
Zipcode	55407-2413
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	I'm really glad this passed, and so glad to see this work being done. I'm wondering if there is anything that can be done on the non-monetary side to get large internet utilities to address the uneven way in which they provide and upgrade service. I recently moved into Ward 11 Minneapolis, and was fortunate enough to be able to sign up for high speed fiber through USI Wireless. But then I looked at their service map and was so disgusted that I first researched if there were other providers I could use besides them. They had dead zones directly over the old red zones, practically to the block. How are we going to recover from our racism emergency if we let private utility companies continue this digital access segregation? I love that the state of MN has committed money to positively fill these infrastructure gaps itself. But on the other side of the equation, the state of MN can do a lot to make these companies answer for their patterns and practices too. I love being Minnesotan, but I don't like that we refuse to have tough conversations with the businesses who are perpetuating our worst disparities, especially while under the guise of providing a public utility! Someone living in North Minneapolis should have the same speed internet access as someone with lakefront property in Uptown or Wayzata. I hope that this is the first step in a larger plan towards digital equity for all Minnesotans.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #24]
Zipcode	55037
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	I live 2.5 miles northwest of Hinckley and am unable to receive quality internet. In the past have tried Century Link and it was unreliable and slow so discontinued(many times no service and had to wait days before it was restored). It would cost too much for satellite ,Minnesota Power does not offer internet service.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #25]
Email	[removed]
Zipcode	55129
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	Handout: Executive summary
Comment regarding the Digital Opportunity Plan	Apparently no one can get coverage at Woodbury HS. They had to go out to the parking lot to get coverage for fundraising transactions.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+ People from Minoritized Racial/Ethnic Groups Veterans People with Disabilities People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #26]
Email	[removed]
Zipcode	55401
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan

As a librarian at a public library, I appreciate that the plan mentions the role that public library systems play in giving residents access to computers, broadband internet, and software. Libraries ARE the digital inclusion safety net for many people. Public libraries are where people land when they don't know where else to go to perform essential online tasks. Many public agencies and employers send people to public libraries to use the computers and internet access with the assurance, "they will help you". Sometimes, people arrive at the library assuming staff will complete forms or other tasks on their behalf. Therefore, any plans for digital navigation services, including technology instruction and skills coaching, must directly involve and support frontline, public services staff in libraries. If community organizations receive funding for digital navigation, make sure that public library staff know how and to whom to refer people to these partners. In addition, we must either fund additional library staff and train us to do digital literacy and skills instruction and to be digital navigators or station digital navigators in public library buildings.

It is crucial that frontline public library staff are at the table when digital inclusion efforts are being planned to ensure that we have qualified staff on the ground in libraries to meet the needs of people where they are. Do not assume that larger governmental bodies such as counties or cities are involving their public library staff in planning or implementation of digital inclusion efforts. These larger governmental bodies often completely ignore the need for direct, in-person support to people in our library buildings. Just because the city or county has a digital inclusion plan doesn't mean that they are paying any attention to people who land in the library or to the needs of the libraries or library staff. It doesn't mean that true collaboration is happening. Libraries and frontline library staff can and should be leaders in digital inclusion, not an afterthought.

At the same time that I think we must teach people how to use the internet, computers, and other technology, I'm also concerned about people who simply are not capable of learning to use computers and other information technology. These can include people with brain injuries or dementia, people who are illiterate, people with learning disabilities, people with intellectual disabilities, some elderly people, and people who are simply unwilling. What are their options to accomplish essential and necessary tasks such as filling out their employment applications, filing their taxes, enrolling in Medicare, attending telehealth appointments, submitting immigration forms, applying for public benefits and assistance, and so much more? We need digital navigators in every community who can step in and do these tasks for people who are unable or unwilling to learn essential digital skills while still maintaining individuals' privacy and cybersecurity.

Optional: Do you identify with any of the following covered populations?   People with Disabilities

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Melissa Brusacoram
Email	melissa.brusacoram@aeoa.org
Zipcode	55741
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	6: Areas of Alignment
Comment regarding the Digital Opportunity Plan	Adult Basic education (ABE) is a statewide program with 3 standards of education as guiding factors. ABE serves thousands of students through hundreds of programs around the entire state. One standard that guides them is Digital literacy. ABE oftens works with people from marginalized communities including those with low incomes, those that identify from the BIPOC community, immigrants, and non-traditional post-secondary students. ABE applies digital literacy skills to all classes, such as classes for the High School Equivalency tests, GED and HISET, even offering online courses for free to allow people to study and prepare for their tests. These online courses allow students to remove barriers such as workdays, travel plans and day care, allowing them to participate in classes around their schedules. Many ABE programs even loan devices out to students to allow them to study or assist students in finding low-cost devices to purchase through programs such as PC's for People.

ABE offers other classes such as English as a second language, Citizenship, college preparation, family literacy and career readiness classes such as preparation for CDL classes, nursing assistants, and school paraprofessional classes. All of these classes incorporate digital skills, and even offer many of them virtually. The pandemic highlighted the need for virtual classes, and these continue to this day in many ABE programs. For example, the AEOA Virginia ABE location offers both ESL and Citizenship classes virtually and is prepared to offer other classes virtually as needed.

Your plan needs to bring ABE into the conversation, as ABE has worked toward true digital equity for many years. |

Is there an additional section you would like to comment on?   Yes

Which section of the plan does your comment address?   3: The Current State of Digital Opportunity

Comment regarding the Digital Opportunity Plan

The plan outlines strengths in local communities, both metro and rural, as offering digital services from local libraries and Careerforce centers. However, both of these services have decreased access to services in the past 5 years, particularly during and after the pandemic. Many Careerforce centers reduced the number of computers available to the public in the last 5 years. For example, the Virginia Careerforce location reduced computer availability from 15 computers to 3. Also the amount of hours available at some Careerforce locations have been greatly reduced. For example, upon reopening during the pandemic, the Hibbing Careerforce reduced its days open to the public from 5 down to just 2 days a week, the hours that it continues to maintain.

Local libraries may have desktop computers open to use, but many libraries have policies in place to prevent patrons from using the computers if they owe a fine to the library. If said person can't afford to pay the fine first, they are not allowed to use the public computers. Being that people of lower income are more likely to seek free public library services for things such as seeking employment, participating in online education classes, and registering to take a GED test, all done using the internet, this greatly impacts their future ability to increase their employability and wages.

Libraries often also limit hours of usage on the computers to 1 hour per patron making it difficult for people looking to further their education via online courses, something ABE provides to students at no cost.

Optional: Do you identify with any of the following covered populations?   People Living in Rural Areas

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Robin Turnblom
Email	rturnblom@hclib.org
Zipcode	55401
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan

I work as a librarian in a major metro area public library branch in the Twin Cities. I appreciate much of what is in the draft of the Digital Opportunity Plan as it pertains to libraries, but I'd like to ask for more.

Clearly, libraries are important as community gathering spaces--several of the public comment sessions are being held at libraries. As evidenced in the report, they are also clearly a critical technology provider for folks, for both WiFi and computers (p. 32). I'd like to add that library staff are already providing digital navigation support for the community, every day.

I support OBD's goal to provide funding to pilot digital navigator positions at libraries and other community partners (p.16). Digital navigators can be widely defined. In libraries, which were often open during the pandemic when other public service agencies were not, we need digital navigators who work on the floor, in person with patrons, as library staff already do. Digital navigators don't have to be proficient in languages other than English, but my hope is that some of the focus of funding provided would be for attracting navigators who have those skills.

Digital navigators are especially critical for libraries who do not have enough staff to help with in-depth computer questions for longer periods of time. On page 40, this is presented as a rural library issue, but FTE alone cannot demonstrate the demand being placed on employees. Metro library staff are also feeling squeezed. We want to provide more services but often are unable to do so because of staffing. More digital navigators on staff would be great, but I wish this plan included support for the library staff who are already doing this work, such as funding for training. I have spoken to colleagues who don't feel comfortable answering certain technology questions because they have not been trained.

If libraries are such critical community hubs for digital opportunities, then support for libraries and library staff needs to be stronger.

Is there an additional section you would like to comment on?   No

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Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Stephany Medina
Email	Medinas@communityhealthboard.org
Zipcode	55802
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	1: Introduction
Comment regarding the Digital Opportunity Plan	Consider reversing the order of sections 1.1.2 "Goals and Objectives" and 1.2.1 "Defining Digital Opportunity." The definitions are important to understanding the goals and objectives. The goals and objectives did not make sense to me until after I read the definitions.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	4: Goals
Comment regarding the Digital Opportunity Plan	I see Goal 3 as a top priority. Access to devices and affordable internet at a usable speed is important, especially in rural regions. Many folks in rural areas do not currently have internet services available to a reasonable speed or price (e.g., cannot join a Zoom meeting without interruptions). Goal 3 is very supportive of Goal 2.2. Grant funds can support local plans to build a more adequate broadband infrastructure. While education and data are important infrastructure pieces, access to devices and affordable internet are where community members will feel impacts most tangibly. Goal 2.1 could use clarity (Minnesotans can access comprehensive data and mapping tools to evaluate digital opportunity in their areas as well as statewide.) The objectives make it sound like the audience for the data is professional practitioners, but the goal makes it sound like the audience is residents. What data is being collected and for what use(s)?

Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	Appendices A B, C
Comment regarding the Digital Opportunity Plan	Thank you for drafting this plan and including opportunities for feedback in the process! This is important work that connects strongly to the opportunity for holistic wellbeing of Minnesotans!
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas People from Minoritized Racial/Ethnic Groups

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Elena Foshay
Email	efoshay@duluthmn.gov
Zipcode	55802
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan

3.1.1 #2
- Providing grants to support Digital Navigators is important, and this role is needed in communities of all sizes, all over the state, in a wide variety of settings. There is just as much a need for this role in urban communities as rural, and particularly in places with a higher concentration of older adults, New Americans, Native Americans, and individuals living in generational poverty. These grants should be available to communities of all sizes, through a wide variety of organizations that host public computer access, including, but not limited to, libraries, CAP agencies, CareerForce locations, schools, and community-based organizations.
3.1.1 #3a
This section should be adjusted to include training resulting in industry-recognized credentials, to perform both repairs and tech support. We recommend that this effort be connected to Local Workforce Development Boards, who can provide leveraged support in the form of tuition assistance for training costs, and funding for wages for youth workers.
3.2.1 #2a
Some communities have already completed studies of digital opportunities at their own expense. Expand to include grant funding for implementation of strategies outlines existing plans, for those communities who have already completed the planning step.
3.3.1 #3c
CareerForce locations are willing and able to partner to expand digital skills resources and training, as most locations have computer labs open to the public for job search, job applications, resume writing, Unemployment Insurance applications, and more. In the past, these computer labs were staffed with digital navigators who provide over-the-shoulder digital literacy training in the moment and specific to the individual's needs. There is a need for additional resources to expand open hours of these labs, and ensure they are staffed. Those who need the most assistance are best served through in-person services.

Is there an additional section you would like to comment on?   Yes

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Which section of the plan does your comment address?   5: Implementation

Comment regarding the Digital Opportunity Plan

5.1.3
Under Systemic Challenges, one key challenge that's missing is that, in much of Greater Minnesota, there isn't competition for broadband internet access providers. This results in high prices and poor quality service in some communities. Monthly internet costs increased significantly after the pandemic, where even middle-income households feel the impact. And in Greater Minnesota communities deemed 'served,' meaning that broadband coverage is theoretically available, there are pockets without broadband access or where service is slow or spotty. The quality of service for the price just doesn't add up, but state grants aren't available to support investment in improving existing systems.

Is there an additional section you would like to comment on?

No

Optional: Do you identify with any of the following covered populations?

People Living in Rural Areas
Adults Age 60+
People from Minoritized Racial/Ethnic Groups
People with Disabilities
People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #27]
Email	[removed]
Zipcode	55411
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation
Comment regarding the Digital Opportunity Plan	I appreciated the idea of utilizing high schools to train students to provide tech support and repairs. Since trust in their teacher is such a significant factor for folks with low digital literacy who are trying to improve their skills, I'd love to see expansion on this idea. Perhaps utilizing programs that already exist to provide employment training to youth (Step Up, Emerge, etc.), so youth can be paid to teach their family members in-home.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	3: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	There are concerns about funding from BEAD going primarily to Greater MN. While we understand it's needed there, we also want to ensure that closing internet service gaps in the Metro are also prioritized by OBD and maps continue to be updated to reflect those gaps. Thank you for all your hard work on this plan!
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #28]
Email	[removed]
Zipcode	56057
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	Metronet has been in the Cordova area (southeast of Le Center). No company has contacted me personally to promote their company and to suggest how I can be hooked up to the Internet. I have been in contact with Metronet several times and have seen no answers about my questions nor anyone even contacting me.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	7: Conclusion
Comment regarding the Digital Opportunity Plan	I am angry that I am very unimportant to any of the Internet companies that they can't take the time to personally come to my house and inform me how I can be hooked up to the Internet. It is a disservice to the rural community and those out on the farm land that we are not important enough for assistance. I have given my name, address, phone number several times to Metronet and had no action on their part. What a disappointment that they are receiving funding, but no action on for me. Are they worthy of more funding??????
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #29]
Email	[removed]
Zipcode	56362
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	7: Conclusion
Comment regarding the Digital Opportunity Plan	$65 Billion would be better spent on subsidizing StarLink for those who need it. Let the private business handle it. Simple.

This would:
*Remove the bureaucracy, its wastefulness, salaries, "studies" and "reports.".
*Remove unnecessary committees, state Broadband Offices, Help Lines and Support.
*Stop all physical broadband installations across Minnesota. $380MM invested already?! In what? Physical wires and legacy communications?
*This report is a bloated mess and creates complication.
*Determine who legitimately needs help getting connected and set them up with StarLink satellite access. It's Plug & Play. Simple and simply works, right out of the box. Cover the upfront hardware fee of ~$600.00. Make recipients pay a small amount per month so they have skin in the game. Maybe $20 per month (regular $90-110).
*This way the money goes to actually solving the problem instead of waste, inefficiency and corruption. |
| **Is there an additional section you would like to comment on?** | No |

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	David Avery
Email	david.avery@windstream.com
Zipcode	72212
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	ACP/Affordability Participation in the Affordable Connectivity Program (ACP) should be the only affordability requirement related to BEAD funding requirements. Windstream is a proud participant in the ACP and joins OBD in the desire to ensure the continuity of the Program. Windstream is undertaking extensive Congressional advocacy efforts regarding the continuation of the ACP. A mandated fixed long-term pricing is a strain on providers' autonomy and ability to align with economic challenges as costs increase over the life of a customer. Ultimately, it will serve as a prohibitive measure discouraging large and small providers' participation in the program, putting the OBD's goals in opposition with one another. Windstream's Digital Equity & Digital Literacy Efforts Windstream is proud of its robust digital literacy efforts throughout the country to reduce the digital divide. In August 2023, Windstream announced it offers free online courses for children and adults through its Kinetic Digital Literacy Program which is available to Minnesota residents. Through the program, users are taught essential computer skills, basic office software skills, and daily technology skills. Anyone anywhere can take a course for free anytime by visiting Kinetic's digital literacy website, (https://www.windstream.com/residential/digital-literacy-program). Learners do not need to register. Nor do they need to be Kinetic customers. And they can take the courses as many times as they like.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #30]
Email	[removed]
Zipcode	55009
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	We are the poster children for rural Minnesotans under served by wired broadband. We and our neighbors are located about 1 mile off the county road where broadband fiber exists. It doesn't pay our provider to to upgrade us from copper to fiber due to the cost. We all have the same service provider - Nutelecom/Nuvera New Ulm. Our usual speed is <14 mbps download and <2 mbps upload. Availability to all three homes is overstated on the FCC map so we are all sure we are very low priority for any public funds. Are we eligible for the Broadband Line Extension Program?
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+ Veterans

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #31]
Email	[removed]
Zipcode	55123
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	It's important to invest in exploring how digital connectivity is being used to keep incarcerated parents connected to their families. There is a disconnect between training people of color into technical roles, & the hiring of people of color in tech. Invest in apprenticeships & work/training programs specifically for Black, SE Asian, & Indigenous people. Focus on providing services in native languages, & allocate budget to train foreign language speakers as digital navigators. fNon english speakers are very vulnerable to scammers. Refugees being placed in our state should be given computers & hotspots. There is nearly no support for bringing folks with disabilities in to digital access. Very few strategies to integrate them & help them find employment which makes them experience a lot of poverty.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+ People from Minoritized Racial/Ethnic Groups People with Disabilities People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Comcast
Email	Anna_Boroff@comcast.com
Zipcode	55107
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	Handout: Executive summary

Comment regarding the Digital Opportunity Plan

Comcast Cable Communications, LLC, on behalf of its subsidiaries (together, "Comcast"), submits this letter in response to the Minnesota Draft Digital Opportunity Plan ("Draft Plan" or "Plan"). Comcast thanks the Minnesota Office of Broadband Development ("OBD") for seeking stakeholder comment and commends it for an exemplary start to achieving digital opportunity for all Minnesota residents and communities.

We applaud Minnesota's work to date, which as the Plan identifies has resulted in Minnesotans having a slightly higher rate of home internet subscriptions than the national average. We also appreciate the statement that "this is not OBD's digital opportunity plan for Minnesota. Rather, this plan belongs to Minnesota." This sets a clear tone for the task at hand, that for digital opportunity goals to be met, there needs to be a broad and shared focus and accountability to achieve success. We could not agree more - and fully subscribe to the notion that for digital opportunity efforts to make a meaningful impact, it starts by clearly articulating the critical role that public, private, and non-profit stakeholders play, as well as their shared interests in making sure these efforts are impactful.

The Plan accurately identifies that the digital divide results from a complex and interrelated mix of barriers and that trust, relevance, and safety are essential to success in closing this divide. The Plan also rightfully acknowledges that a unified group of digital equity advocates across Minnesota will increase shared knowledge and expertise and develop a network of practitioners who can continue to learn from one another through real-time collaboration and communication around partnerships, best practices, and initiatives that meaningfully contribute to adoption and equity efforts in their communities. For example, the Plan points to promising models, such as digital navigators, that can move the needle in both rural and urban communities alike. A statewide network of digital navigator practitioners can grow and learn from one another's experiences and share tactics and strategies for increasing Affordable Connectivity Program ("ACP") adoption, expanding digital skilling, and connecting more individuals to digital services. Additionally, establishing this network will provide speed to market in launching new tools and strategies to address skills training, cybersecurity training, and digital opportunity pathways - which are key focus areas that the Plan has identified.

We also agree that making informed and meaningful investments backed by data and based on proven strategies that yield results is of utmost importance. While the Broadband Equity, Access, and Deployment ("BEAD") Program and Digital Equity Act represent significant and generational investments in broadband deployment and opportunity, they are finite funds. As the Plan states, given Minnesota's expansive geography and unique deployment challenges, funds available for digital equity activities will be stretched even thinner. That underscores how essential partnerships will be to this process, in choosing deployment partners that have a proven track record of success and significant expertise in network deployment, management, continued reinvestments,

and ongoing innovation, and also in understanding the importance of digital equity efforts to the meaningful use and adoption of newly deployed networks. Private sector investments and commitment to digital equity will be paramount to the overall success of the State's goals for broadband deployment and digital opportunity - Connect People to People, Connect People to Information, and Connect People to Resources. Communities win when the public, private, and non-profit sectors work together to accomplish shared goals.

Comcast offers these comments to the Draft Plan in the spirit of continued partnership and looks forward to continuing this critical work to close Minnesota's digital divide.

Comcast Has Invested Significantly in Minnesotan Connectivity

Comcast is a strong supporter of broadband deployment and adoption initiatives in Minnesota and stands ready to further support the State's efforts. Comcast continues to invest heavily in the State, with investments during the past three years totaling $1.4 billion, including $473 million toward technology and infrastructure investments like Internet network upgrades. 1.3 million Minnesota homes and businesses have access to Xfinity Internet and Comcast Business products and services, including speeds of 1.2 gigabits or more. Comcast's investments serve as force multipliers for public funding, including over $10 million in grants from Minnesota's Border-to-Border Broadband Development Grant Program and American Rescue Plan Act funds, serving over 3,000 new locations. Over the past three years, Comcast has added and upgraded nearly 10,000 miles of our network to connect homes and businesses across the United States, including Minnesota, with plans to bring its next generation 10G network throughout the State. This growth is all part of the more than $20 billion investment Comcast made nationwide from 2018 to 2022 in our networks, which now cover more than 60 million U.S. homes and businesses. Given Comcast's long and proven track record of success expanding broadband access and adoption in Minnesota, Comcast stands ready to partner with the State in its digital equity efforts through a variety of existing programs.

Internet Essentials

The Plan provides a three-legged stool metaphor, signifying different elements of digital access, including access to Internet service, access to an Internet-enabled device, and relevant digital skills. These are the foundation for Comcast's Internet Essentials ("IE").

IE is the largest and most successful broadband adoption initiative in the industry, connecting more than 10 million Americans to broadband Internet at home since launching in 2011. IE is designed to be a wrap-around solution that addresses the main barriers to broadband adoption. IE provides subscribers with access to broadband service at speeds of 50/10

Mbps for $9.95 per month or 100/20 Mbps for $29.95 per month (for IE Plus), access to millions of Xfinity WiFi hotspots, a wireless gateway at no additional cost, the ability to obtain low-cost or no-cost computers, unlimited data, and free digital skills training.   Notably, while the IE price of $9.95 per month has remained steady since the program launched, speeds for that service have increased seven times, including more than doubling during the early days of the pandemic.   Recognizing the critical need for Internet-ready devices in addition to a broadband connection, Comcast has distributed more than 200,000 free and subsidized laptops.   The IE program has been designed to eliminate barriers for financially constrained households and help more families benefit from home Internet access. To become an IE customer, there is no credit check required, no term contract requirement, and customers who do not have a social security number (or prefer not to provide their social security number) may provide other forms of identification to apply.

• Since 2011, 416,000 low-income Minnesota residents in 104,000 homes have connected to the Internet through IE.

• The top cities for IE connections include Minneapolis, Saint Paul, Brooklyn Park, Bloomington, and Burnsville, and the top counties include Hennepin, Ramsey, Anoka, Dakota, and Washington.

We have recognized that offering IE is not sufficient if there is no awareness of the program. Comcast, therefore, has spent significant effort identifying effective ways to get IE information into the community. For example, we have identified partnerships for direct IE mailers, such as the Minneapolis Public Housing Authority to mail IE information to more than 6,000 residents; Tickets for Kids to promote IE to 330+ schools and social service agencies; and Greater Twin Cities United Way to provide IE materials to over 100 partner agencies to include as a backpack stuffer during Back-to-School activities.   In addition, we partnered with Stairstep Foundation's His Works United initiative to support more than 10 IE ambassadors in local congregations. We have worked with Minneapolis neighborhood organizations to place IE information in local neighborhood newsletters and identified diverse media publications in which to place IE advertisements such as the Minnesota Spokesman-Recorder, Insight News, Mshale, Sahan Journal, Latino American Today, KMOJ, La Raza Radio, and more. We have also held numerous sign-up and awareness events, including for seniors living in low-income housing, St. Paul Public Schools, and Hmongtown Marketplace, in order to answer questions, assist in real time, and meet people where they are.

Comcast/Xfinity proudly participates in ACP with all tiers of Internet service the company offers, including two tiers (IE and IE Plus) that are fully covered by the $30 ACP benefit. As the Draft Plan notes, a Digital Connection Committee, spearheaded by African Community Senior Services, reported that approximately half of their clients used their ACP benefit, with many selecting IE Plus.   Beyond connectivity, we work with

tens of thousands of partners across the country, including nonprofits and city leaders, to support digital skills training to improve economic mobility. We offer free training through our IE Learning Center, which features hundreds of modules on Internet basics, online safety, digital skills for everyday life, and advanced skill-building. The content is curated from partners like Common Sense Media, Goodwill, CNBC, Women in Sports Technology, and more. In addition, Comcast has partnered with several experts, including ConnectSafely, Older Adults Technology Services ("OATS"), and Council for Opportunity in Education, to develop printed digital skills curricula that are distributed to thousands of community partners free of cost. These include several online safety toolkits for seniors and students, discussion guides for parents, and our Jurassic World STEAM curricula. Comcast has long invested in nonprofit partners focused on digital skills via the Comcast NBCUniversal Foundation to help provide skills-building, job training, and other career development offerings for the full spectrum of learners, from elementary, middle and high school students to adults. Locally, these organizations include The Sanneh Foundation to expose young people to STEM basics for career exploration; Neighborhood House to teach basic skills to English Language Learners seeking economic mobility; Summit Academy OIC to train youth as digital navigators for local community members; New Vision Foundation to provide coding training and certifications for immigrant youth; and Phyllis Wheatley Community Center to provide nationally-recognized training programs such as Girls Who Code and ManCode to racially-diverse youth.

According to a recent study "Wired and Hired: Employment Effects of Subsidized Broadband Internet for Low-Income Americans" published in the American Economic Journal, IE customers make an average of $1,385 more per year and are 8 percent more likely to be employed than those eligible for but not connected through IE.

Digital Equity Challenges and Opportunities

Barriers to Broadband Adoption. Both longitudinal research and empirical evidence demonstrate that the primary barriers to broadband adoption extend beyond affordability and include perceived relevance and digital readiness, among others:

Perceived Relevance. A significant population of Americans who have not yet adopted home broadband do not recognize the relevance of such connectivity. The National Urban League ("NUL") Lewis Latimer Plan explains that perceived relevance may be tied to a lack of awareness and understanding of the Internet's uses and capabilities, in addition to the necessary skills needed to use it.   NTIA's Internet Use Survey data showed that 58 percent of the 21 million offline households indicated no interest in or need to be online.   Moreover, a 2021 Pew Research Center survey found that 71 percent of non-broadband users say that they would not be interested in an at-home broadband connection.   These numbers help demonstrate why education for and outreach to the unconnected and

newly connected regarding broadband and its associated benefits is imperative for closing the digital divide.

Digital Readiness. Digital readiness is "the sum of the technical skills and cognitive skills people employ to use computers to retrieve information, interpret what they find, and judge the quality of that information" and "the ability to communicate and collaborate using the Internet."   Digital readiness challenges impact different parts of people's lives, including the use of developing technologies, online educational resources, and telehealth capabilities.   While the U.S. workforce has high demand for digital skills, many workers, especially workers of color and those without higher education, lack these skills.

Other Adoption Barriers. Other adoption barriers pertain to information and language, distrust, and structural issues tied to poverty. Information and language barriers may pertain to individuals determining program eligibility, parsing an application process, and setting up devices and services. Addressing language barriers is important for Comcast, which is why call center agents can help IE applicants in more than 240 languages, including American Sign Language.   In addition, printed IE materials are available in 35 languages.   Distrust may pertain to biases against free services and government programs, as well as uncertainty about additional costs and privacy concerns.   Structural barriers may include complicated housing situations, such as recent moves or plans to relocate.   Comcast recognizes that just like there is not a single solution to addressing broadband adoption, the underlying challenges are also not monolithic.

Bridging the Adoption Gap. Empirical evidence demonstrates that community outreach and engagement - by digital navigators, community-based organizations, community anchor institutions, faith-based leaders, and other trusted voices - is vital to overcoming complex adoption barriers.

To this end, Comcast has been investing for more than a decade to expand digital equity and inclusion in Minnesota, including through community outreach and engagement efforts. Project UP is our comprehensive initiative to advance digital equity and help build a future of unlimited possibilities. Backed by a $1 billion commitment to reach tens of millions of people, Project UP encompasses the programs and community partnerships across Comcast, NBCUniversal, and Sky that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers, and creators.

Project UP encompasses a number of longstanding and new initiatives in collaboration with local communities, including:

Digital Navigator Programs. Digital navigators are a powerful and proven tool to aid broadband adoption. Digital navigators are typically hired volunteers or staff from trusted community institutions, such as libraries,

social or public service agencies, and community-based organizations, and can assist users in overcoming barriers to adoption in a tailored manner. Digital navigators can address the relevance of broadband by demonstrating benefits like access to information, telehealth capabilities, and introduction to upskilling programs that serve as pathways to education, employment, and more. A recent Boston Consulting Group ("BCG") study supported by Comcast surveyed 1,500 people who have participated in programs with digital navigators and found that 65 percent of respondents were able to obtain Internet connectivity or a connected device, and 85 percent of respondents now use the Internet more frequently.   The same research demonstrates that the benefits of digital navigators extend beyond individuals obtaining Internet access - almost 50 percent of respondents obtained better health care; more than 40 percent of respondents received support for essentials like food, rent, and housing; and more than one in three respondents found a new job or secured higher incomes.

Given the importance of digital navigators, Comcast has invested $11.4 million in more than 225 nonprofits to support digital navigator programs across our service areas in 2022 alone.   Comcast has been instrumental in creating and supporting first of its kind digital navigator programs in Minnesota, specifically with Literacy Minnesota and Summit Academy OIC. Comcast partnered with Literacy Minnesota to provide financial and leadership support for a digital navigator training program through which other organizations can learn how to start their own programs. In addition, Comcast provided pilot funding and continues to support Summit Academy OIC's Tech Connects Program where youth are trained and employed for 12-weeks to serve as digital navigators at community events. There have been nine cohorts resulting in nearly 80 trained digital navigators at Summit Academy through this program. In addition to assisting their community members with technical needs, the trainers explain that this is the first employment experience opportunity many of these digital navigators have had. Furthermore, we recently provided a $40,000 grant to Smart North, an organization focused on digital equity. The grant is being used to start a digital navigation program at their Community Tech Hub located in South Minneapolis. Moreover, Comcast is funding an AmeriCorps Community Technology Empowerment Program member at The Sanneh Foundation, a digital navigator to expand digital literacy skill classes for youth, assist seniors in connecting with loved ones, and help community residents with job searches and applications.

Recently, we started work with our newest partner, Lead for America, under the banner of the American Connection Corps ("ACC"). Through this program, which has existing roots in Minnesota, we support AmeriCorps members for a year-long placement to become known, trusted, and active collaborators with community organizations, faith-based institutions, and public officials to advance broadband adoption and the availability of digital skills. As the ACC continues to scale and work with locally-based nonprofits, these efforts will reach dozens of communities, including many

in rural areas of Minnesota and dozens of other states. The ACC program is filled with talented folks committed to improving rural America in their work with libraries, elected officials, community anchor institutions, community centers, and Internet service providers.

Additionally, investing in digital navigators will provide individuals from all racial/ethnic and educational backgrounds with the opportunity to learn more about the ways in which broadband-connected technology can be relevant to their lives from members of their own communities. Research from BCG revealed several other key findings, including that (1) trust and relationship-building are key to reaching disconnected communities; (2) familiar outreach channels are most effective at getting learners in the door; (3) one-on-one attention is often most effective, especially for learning fundamental skills; (4) resource-sharing and local coordination can minimize burdens on individual digital navigators; and (5) digital navigators are the trusted voice on the ground for understanding community needs. These solutions address the main barriers to broadband adoption, as described above, and increase digital opportunity for all Minnesotans.

Digital Skills Programs. As digital navigators play a critical role in helping members of Covered Populations overcome adoption barriers, a related component of successful digital adoption efforts is programming to help people develop digital skills once they are connected. Comcast works with organizations that provide skills building, job training, and other career development offerings for the full spectrum of learners, from high school students to adults.

A February 2023 report from the National Skills Coalition and Federal Reserve Bank of Atlanta indicated that 92 percent of jobs available today require digital or likely digital skills, yet almost one-third of U.S. workers lack opportunities to build these skills.   Jobs that require even one digital skill can earn an average of 23 percent more than jobs requiring no digital skills, which translates to an increase of $8,000 in annual income. Developing these digital skills is not only a value add for individual workers, especially for workers of color, but a benefit to the larger U.S. economy.

Comcast supports digital exploration initiatives that teach individuals the basic skills needed to increase competency and confidence in using technology, spark interest in technology careers, and prepare individuals for the jobs of the future through early exposure to technology fields, in-school and after-school programming, technology and computer science programs, and soft skills training. This includes the Phyllis Wheatley Community Center where Comcast supports the DigitalTechWorks Academy to train adults on basic technology skills and youth on coding and E-Sports. In addition, Comcast partners with New Vision Foundation to provide 12-week courses and industry certifications in coding and other Information Technology competencies.

Lift Zones. Comcast, together with nonprofit partners and city leaders, has

created more than 1,250 Lift Zones in community centers nationwide, including 116 Lift Zones in Minnesota. In fact, the very first and the 1,000th Lift Zone milestones were reached in Minnesota. The first Lift Zone was installed at The Sanneh Foundation's Conway Community Center, which is a thriving public space that offers free youth programming and meals to kids in the community. Comcast's 1,000th Lift Zone was at The Sanneh Foundation's Seton Center, which focuses specifically on older youth to assist with career readiness and workforce development.

Another example of the power of Lift Zones is through Comcast's partnership with Minneapolis Parks and Recreation. In 2021, Comcast installed over 40 Lift Zones in the City's community centers located in neighborhoods throughout Minneapolis that serve as a hub for activities and events. Comcast also donated over 200 laptops to Minneapolis Parks and Recreation to provide to families, or to use in their computer rooms throughout these community centers.

Along with free Internet connectivity, Lift Zones offer hundreds of hours of free educational and digital skills content. Not only are 50 percent of low-income households in major Comcast markets within walking distance of a Lift Zone, 40 percent of users report that they would not have had Internet access without the Lift Zone, and 58 percent report that the Lift Zone reduces stress for studying, working remotely, and managing online tasks.

Internet Essentials Partnership Program. In addition to IE, the Internet Essentials Partnership Program ("IEPP") is designed to help accelerate Internet adoption and provides the opportunity for school districts and other organizations to fund and quickly connect large numbers of students and families to broadband access. St. Paul Public Schools, Hennepin County, Minneapolis College, Anoka-Hennepin School District, and Northside Achievement Zone are a few of Comcast's IEPP partners in Minnesota.

ACP Support. Among other significant investments in affordability initiatives, Comcast is committed to promoting ACP. Comcast has supported and/or co-hosted nearly 900 ACP sign-up events nationwide since October 2022, resulting in thousands of ACP enrollments. These events have taken place at senior centers, back-to-school fairs, public housing facilities, festivals, fiestas, and parks. In Minnesota, Comcast has partnered with Tickets for Kids to distribute ACP materials to nearly 400 social service agencies and schools and with Greater Twin Cities United Way to provide their 110 partner agencies with materials for Back-to-School backpacks.

As the Draft Plan also acknowledges, a large share of Minnesota's cultural communities today come from other parts of the globe, and therefore language barriers continue to be a challenge As a result, Comcast has translated ACP information into over 30 different languages that we provide at no cost to our community partners for the populations that they serve. In addition, Comcast used local employees that were proficient in certain

languages to create videos with basic information on the ACP program, including sign-up instructions. These local ACP videos were created in Korean, American Sign Language, English, Urdu, Punjabi, Hmong (Green), Hmong (White), Spanish, French, Hindi, and Russian. These videos are provided to our local partners and shared with their members.

Other Initiatives: Accessibility. Comcast remains focused on helping members of Covered Populations, including individuals over age 60 and those with disabilities. Comcast partners with organizations such as Al Maa'uun and Gifts for Seniors to provide digital navigation services specifically for homebound seniors. Al Maa'uun has incorporated ACP and digital skills materials into their Meals on Wheels program, and Gifts for Seniors has hired a digital navigator to assist seniors with getting online and accessing telehealth resources. In addition, the Comcast NBCUniversal Foundation recently awarded a $1.3 million two-year grant to Easterseals to expand digital literacy training for young adults with disabilities enrolled in Easterseals employment programs. Students with intellectual and/or developmental disabilities ages 16 to 24 will be trained on how to navigate the Internet, communicate through email, create PowerPoint presentations, prepare resumes, use assistive technology, and more.

Final Thoughts

Comcast encourages Minnesota to focus on digital equity efforts that will be the most impactful, including digital navigators, digital skills training programs, and partnerships. Comcast believes that partnerships are paramount to advancing digital equity efforts because closing the digital divide starts at the local level by meeting people where they are and responding to their specific needs. Communities win when the private sector, government, and community organizations join forces to achieve shared goals. To that end, Minnesota should create an inclusive framework that allows many organizations to participate directly in grant programs and that fosters such participation through partnerships and coalitions. As Comcast's more than a decade of dedicated digital adoption and community engagement efforts demonstrate, the private sector has been a critical partner in facilitating digital equity efforts to date. Minnesota's Digital Equity Act implementation should seek to amplify and scale the efforts of these existing successful relationships and ensure that the private sector continues to be a force multiplier for public funding.

Thank you again for the chance to offer our thoughts on the State's Draft Plan. Comcast looks forward to continuing to work with OBD as it refines its Digital Opportunity Plan.

Comcast Cable Communications, LLC, on behalf of its subsidiaries (together, "Comcast"), submits this letter in response to the Minnesota Draft Digital Opportunity Plan ("Draft Plan" or "Plan"). Comcast thanks the Minnesota Office of Broadband Development ("OBD") for seeking stakeholder comment and commends it for an exemplary start to achieving digital opportunity for all Minnesota residents and communities.

We applaud Minnesota's work to date, which as the Plan identifies has resulted in Minnesotans having a slightly higher rate of home internet subscriptions than the national average. We also appreciate the statement that "this is not OBD's digital opportunity plan *for* Minnesota. Rather, this plan *belongs to* Minnesota." This sets a clear tone for the task at hand, that for digital opportunity goals to be met, there needs to be a broad and shared focus and accountability to achieve success. We could not agree more – and fully subscribe to the notion that for digital opportunity efforts to make a meaningful impact, it starts by clearly articulating the critical role that public, private, and non-profit stakeholders play, as well as their shared interests in making sure these efforts are impactful.

The Plan accurately identifies that the digital divide results from a complex and interrelated mix of barriers and that trust, relevance, and safety are essential to success in closing this divide. The Plan also rightfully acknowledges that a unified group of digital equity advocates across Minnesota will increase shared knowledge and expertise and develop a network of practitioners who can continue to learn from one another through real-time collaboration and communication around partnerships, best practices, and initiatives that meaningfully contribute to adoption and equity efforts in their communities. For example, the Plan points to promising models, such as digital navigators, that can move the needle in both rural and urban communities alike. A statewide network of digital navigator practitioners can grow and learn from one another's experiences and share tactics and strategies for increasing Affordable Connectivity Program ("ACP") adoption, expanding digital skilling, and connecting more individuals to digital services. Additionally, establishing this network will provide speed to market in launching new tools and strategies to address skills training, cybersecurity training, and digital opportunity pathways – which are key focus areas that the Plan has identified.

We also agree that making informed and meaningful investments backed by data and based on proven strategies that yield results is of utmost importance. While the Broadband Equity, Access, and Deployment ("BEAD") Program and Digital Equity Act represent significant and generational investments in broadband deployment and opportunity, they are finite funds. As the Plan states, given Minnesota's expansive geography and unique deployment challenges, funds available for digital equity activities will be stretched even thinner. That underscores how essential partnerships will be to this process, in choosing deployment partners that have a proven track record of success and significant expertise in network deployment, management, continued reinvestments, and ongoing innovation, and also in understanding the importance of digital equity efforts to the meaningful use and adoption of newly deployed networks. Private sector investments and commitment to digital equity will be paramount to the overall success of the State's goals for broadband deployment and digital opportunity – Connect People to People, Connect People to Information, and Connect People to Resources. Communities win when the public, private, and non-profit sectors work together to accomplish shared goals.

Comcast offers these comments to the Draft Plan in the spirit of continued partnership and looks forward to continuing this critical work to close Minnesota's digital divide.

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[1] *See Internet Essentials*, Comcast Corp., https://corporate.comcast.com/impact/digital-equity/internet-essentials (last visited Sept. 26, 2023).

[2] Recognizing the many challenges presented by the pandemic, eligible new customers received 60 days of free Internet service through IE during the pandemic. *See, e.g.*, Press Release, Comcast Corp., *Comcast Extends 60-Days of Free Internet Service to New Internet Essentials Customers* (June 18, 2020), https://corporate.comcast.com/press/releases/comcast-extends-free-internet-service-new-internet-essentials-customers.

Recognizing the critical need for Internet-ready devices in addition to a broadband connection, Comcast has distributed more than 200,000 free and subsidized laptops.[3] The IE program has been designed to eliminate barriers for financially constrained households and help more families benefit from home Internet access. To become an IE customer, there is no credit check required, no term contract requirement, and customers who do not have a social security number (or prefer not to provide their social security number) may provide other forms of identification to apply.

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[3] Comcast Corp., *Internet Essentials Progress Report* 30, https://update.comcast.com/wp-content/uploads/sites/33/dlm_uploads/2022/06/IE-ProgressReport_6-23-22.pdf.

[4] Draft Plan at 42.

[5] *Internet Essentials Learning Center*, Xfinity, https://www.xfinity.com/learn/internet-service/internet-essentials/learning (last visited Sept. 26, 2023).

Goodwill, CNBC, Women in Sports Technology, and more. In addition, Comcast has partnered with several experts, including ConnectSafely, Older Adults Technology Services ("OATS"), and Council for Opportunity in Education, to develop printed digital skills curricula that are distributed to thousands of community partners free of cost. These include several online safety toolkits for seniors and students, discussion guides for parents, and our Jurassic World STEAM curricula. Comcast has long invested in nonprofit partners focused on digital skills via the Comcast NBCUniversal Foundation to help provide skills-building, job training, and other career development offerings for the full spectrum of learners, from elementary, middle and high school students to adults. Locally, these organizations include The Sanneh Foundation to expose young people to STEM basics for career exploration; Neighborhood House to teach basic skills to English Language Learners seeking economic mobility; Summit Academy OIC to train youth as digital navigators for local community members; New Vision Foundation to provide coding training and certifications for immigrant youth; and Phyllis Wheatley Community Center to provide nationally-recognized training programs such as Girls Who Code and ManCode to racially-diverse youth.

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Digital Equity Challenges and Opportunities

Barriers to Broadband Adoption. Both longitudinal research and empirical evidence demonstrate that the primary barriers to broadband adoption extend beyond affordability and include perceived relevance and digital readiness, among others:[7]

Perceived Relevance. A significant population of Americans who have not yet adopted home broadband do not recognize the relevance of such connectivity. The National Urban League ("NUL") Lewis Latimer Plan explains that perceived relevance may be tied to a lack of awareness and understanding of the Internet's uses and capabilities, in addition to the necessary skills needed to use it.[8] NTIA's Internet Use Survey data showed that 58 percent of the 21 million offline households indicated no interest in or need to be online.[9] Moreover, a 2021 Pew Research Center survey found that 71 percent of non-broadband users say that they would not be

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[6] George W. Zuo, *Wired and Hired: Employment Effects of Subsidized Broadband Internet for Low Income Americans*, 13 Am. Econ. J.: Econ. Pol'y 447 (Aug. 2021).

[7] *See* National Urban League, *The Lewis Latimer Plan for Digital Equity and Inclusion* 53 (2021) ("NUL Lewis Latimer Plan") (noting that "[e]xtensive public and private surveys suggest that, since 2010, there are three principal causes of the adoption gap, broadly speaking: problems of affordability, digital readiness, and perceived relevance"), https://nul.org/sites/default/files/2021-03/NUL%20LL%20DEIA%20033021%20Latimer%20Plan_vFINAL_11AM.pdf.

[8] *Id.* at 61.

[9] NTIA, *Switched Off: Why Are One in Five U.S. Households Not Online?* (Oct. 5, 2022), https://ntia.gov/blog/2022/switched-why-are-one-five-us-households-not-online.

interested in an at-home broadband connection.[10] These numbers help demonstrate why education for and outreach to the unconnected and newly connected regarding broadband and its associated benefits is imperative for closing the digital divide.

   Digital Readiness. Digital readiness is "the sum of the technical skills and cognitive skills people employ to use computers to retrieve information, interpret what they find, and judge the quality of that information" and "the ability to communicate and collaborate using the Internet."[11] Digital readiness challenges impact different parts of people's lives, including the use of developing technologies, online educational resources, and telehealth capabilities.[12] While the U.S. workforce has high demand for digital skills, many workers, especially workers of color and those without higher education, lack these skills.[13]

   Other Adoption Barriers. Other adoption barriers pertain to information and language, distrust, and structural issues tied to poverty. Information and language barriers may pertain to individuals determining program eligibility, parsing an application process, and setting up devices and services. Addressing language barriers is important for Comcast, which is why call center agents can help IE applicants in more than 240 languages, including American Sign Language.[14] In addition, printed IE materials are available in 35 languages. [15] Distrust may pertain to biases against free services and government programs, as well as uncertainty about additional costs and privacy concerns.[16] Structural barriers may include complicated housing situations, such as recent moves or plans to relocate.[17] Comcast recognizes that just like there is not a single solution to addressing broadband adoption, the underlying challenges are also not monolithic.

Bridging the Adoption Gap. Empirical evidence demonstrates that community outreach and engagement – by digital navigators, community-based organizations, community anchor

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[10] Andrew Perrin, *Mobile Technology and Home Broadband 2021*, Pew Research Center (June 3, 2021), https://www.pewresearch.org/internet/2021/06/03/mobile-technology-and-home-broadband-2021/.

[11] NUL Lewis Latimer Plan at 60.

[12] *Id.* at 61.

[13] Broderick Johnson, *National Skills Coalition Report: We Must Close the Digital Skill Divide*, Comcast Stories (Feb. 8, 2023), https://corporate.comcast.com/stories/national-skills-coalition-report-close-digital-skill-divide.

[14] Press Release, Comcast Corp., *Comcast Commits to Investing $1B Over Next 10 Years to Reach 50M Low-Income Americans With Tools and Resources to Succeed in Digital World* (Mar. 24, 2021), https://corporate.comcast.com/press/releases/comcasts-internet-essentials-program-hits-ten-year-mark.

[15] *See Internet Essentials Partner Portal*, Comcast Corp., https://partner.internetessentials.com/ (last visited Sept. 28, 2023).

[16] Matt Kalmus et al., Boston Consulting Group, *A Human Approach to Closing the Digital Divide* 3, 4, 8 (June 13, 2022), https://mkt-bcg-com-public-pdfs.s3.amazonaws.com/prod/how-to-close-digital-divide-with-human-approach.pdf ("June 2022 BCG Study").

[17] Chris Goodchild, et al., Boston Consulting Group, *Boosting Broadband Adoption and Remote K-12 Education in Low-Income Households* 6 (May 12, 2021), https://mkt-bcg-com-public-pdfs.s3.amazonaws.com/prod/accelerating-broadband-adoption-for-remote-education-low-income-households.pdf.

institutions, faith-based leaders, and other trusted voices – is vital to overcoming complex adoption barriers.

To this end, Comcast has been investing for more than a decade to expand digital equity and inclusion in Minnesota, including through community outreach and engagement efforts. **Project UP** is our comprehensive initiative to advance digital equity and help build a future of unlimited possibilities. Backed by a $1 billion commitment to reach tens of millions of people, Project UP encompasses the programs and community partnerships across Comcast, NBCUniversal, and Sky that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers, and creators.[18]

Project UP encompasses a number of longstanding and new initiatives in collaboration with local communities, including:

Digital Navigator Programs. Digital navigators are a powerful and proven tool to aid broadband adoption. Digital navigators are typically hired volunteers or staff from trusted community institutions, such as libraries, social or public service agencies, and community-based organizations, and can assist users in overcoming barriers to adoption in a tailored manner. Digital navigators can address the relevance of broadband by demonstrating benefits like access to information, telehealth capabilities, and introduction to upskilling programs that serve as pathways to education, employment, and more. A recent Boston Consulting Group ("BCG") study supported by Comcast surveyed 1,500 people who have participated in programs with digital navigators and found that 65 percent of respondents were able to obtain Internet connectivity or a connected device, and 85 percent of respondents now use the Internet more frequently.[19] The same research demonstrates that the benefits of digital navigators extend beyond individuals obtaining Internet access – almost 50 percent of respondents obtained better health care; more than 40 percent of respondents received support for essentials like food, rent, and housing; and more than one in three respondents found a new job or secured higher incomes.[20]

Given the importance of digital navigators, Comcast has invested $11.4 million in more than 225 nonprofits to support digital navigator programs across our service areas in 2022 alone.[21] Comcast has been instrumental in creating and supporting first of its kind digital navigator programs in Minnesota, specifically with Literacy Minnesota and Summit Academy OIC. Comcast partnered with Literacy Minnesota to provide financial and leadership support for a digital navigator training program through which other organizations can learn how to start their own programs. In addition, Comcast provided pilot funding and continues to support Summit Academy OIC's Tech Connects Program where youth are trained and employed for 12-weeks to

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[18] *Project UP*, Comcast Corp., https://corporate.comcast.com/impact/project-up (last visited Sept. 26, 2023).

[19] *See* June 2022 BCG Study at 2, 15.

[20] *Id.* at 15.

[21] *See* Broderick Johnson, *ACP Week of Action: Comcast's Commitment to Affordable Connectivity for All*, Comcast Stories (June 14, 2023), https://corporate.comcast.com/stories/acp-week-of-action-comcast-commitment-affordable-connectivity-for-all.

serve as digital navigators at community events. There have been nine cohorts resulting in nearly 80 trained digital navigators at Summit Academy through this program. In addition to assisting their community members with technical needs, the trainers explain that this is the first employment experience opportunity many of these digital navigators have had. Furthermore, we recently provided a $40,000 grant to Smart North, an organization focused on digital equity. The grant is being used to start a digital navigation program at their Community Tech Hub located in South Minneapolis. Moreover, Comcast is funding an AmeriCorps Community Technology Empowerment Program member at The Sanneh Foundation, a digital navigator to expand digital literacy skill classes for youth, assist seniors in connecting with loved ones, and help community residents with job searches and applications.[22]

Recently, we started work with our newest partner, Lead for America, under the banner of the American Connection Corps ("ACC"). Through this program, which has existing roots in Minnesota, we support AmeriCorps members for a year-long placement to become known, trusted, and active collaborators with community organizations, faith-based institutions, and public officials to advance broadband adoption and the availability of digital skills. As the ACC continues to scale and work with locally-based nonprofits, these efforts will reach dozens of communities, including many in rural areas of Minnesota and dozens of other states. The ACC program is filled with talented folks committed to improving rural America in their work with libraries, elected officials, community anchor institutions, community centers, and Internet service providers.

Additionally, investing in digital navigators will provide individuals from all racial/ethnic and educational backgrounds with the opportunity to learn more about the ways in which broadband-connected technology can be relevant to their lives from members of their own communities. Research from BCG revealed several other key findings, including that (1) trust and relationship-building are key to reaching disconnected communities; (2) familiar outreach channels are most effective at getting learners in the door; (3) one-on-one attention is often most effective, especially for learning fundamental skills; (4) resource-sharing and local coordination can minimize burdens on individual digital navigators; and (5) digital navigators are the trusted voice on the ground for understanding community needs.[23] These solutions address the main barriers to broadband adoption, as described above, and increase digital opportunity for all Minnesotans.

Digital Skills Programs. As digital navigators play a critical role in helping members of Covered Populations[24] overcome adoption barriers, a related component of successful digital adoption

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[22] Broderick Johnson, *Rebuilding After Fire to Keep a Community Connected*, Comcast Stories (Mar. 14, 2023), https://corporate.comcast.com/stories/comcast-revisits-its-very-first-wifi-connected-lift-zone.

[23] June 2022 BCG Study at 22-23.

[24] The Digital Equity Act defines "Covered Populations" to include (1) individuals who live in low-income households; (2) aging individuals; (3) incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility; (4) veterans; (5) individuals with disabilities; (6) individuals with a language barrier, including individuals who are English learners and have low levels of literacy; (7) racial and ethnic minorities; and (8) rural inhabitants. *See* NTIA, Digital Equity Act of 2021; Request for Comment, 88 Fed. Reg. 13101, 13102 (Mar. 2, 2023).

efforts is programming to help people develop digital skills once they are connected. Comcast works with organizations that provide skills building, job training, and other career development offerings for the full spectrum of learners, from high school students to adults.

A February 2023 report from the National Skills Coalition and Federal Reserve Bank of Atlanta indicated that 92 percent of jobs available today require digital or likely digital skills, yet almost one-third of U.S. workers lack opportunities to build these skills.[25] Jobs that require even one digital skill can earn an average of 23 percent more than jobs requiring no digital skills, which translates to an increase of $8,000 in annual income.[26] Developing these digital skills is not only a value add for individual workers, especially for workers of color, but a benefit to the larger U.S. economy.

Comcast supports digital exploration initiatives that teach individuals the basic skills needed to increase competency and confidence in using technology, spark interest in technology careers, and prepare individuals for the jobs of the future through early exposure to technology fields, in-school and after-school programming, technology and computer science programs, and soft skills training. This includes the Phyllis Wheatley Community Center where Comcast supports the DigitalTechWorks Academy to train adults on basic technology skills and youth on coding and E-Sports. In addition, Comcast partners with New Vision Foundation to provide 12-week courses and industry certifications in coding and other Information Technology competencies.

Lift Zones. Comcast, together with nonprofit partners and city leaders, has created more than 1,250 Lift Zones in community centers nationwide, including 116 Lift Zones in Minnesota. In fact, the very first and the 1,000th Lift Zone milestones were reached in Minnesota. The first Lift Zone was installed at The Sanneh Foundation's Conway Community Center, which is a thriving public space that offers free youth programming and meals to kids in the community.[27] Comcast's 1,000th Lift Zone was at The Sanneh Foundation's Seton Center, which focuses specifically on older youth to assist with career readiness and workforce development. [28]

Another example of the power of Lift Zones is through Comcast's partnership with Minneapolis Parks and Recreation. In 2021, Comcast installed over 40 Lift Zones in the City's community centers located in neighborhoods throughout Minneapolis that serve as a hub for activities and

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[25] Broderick Johnson, *National Skills Coalition Report: We Must Close the Digital Skill Divide*, Comcast Stories (Feb. 8, 2023), https://corporate.comcast.com/stories/national-skills-coalition-report-close-digital-skill-divide.

[26] *Id.*

[27] Broderick Johnson, *Rebuilding After Fire to Keep a Community Connected*, Comcast Stories (Mar. 14, 2023), https://corporate.comcast.com/stories/comcast-revisits-its-very-first-wifi-connected-lift-zone.

[28] Press Release, Comcast Corp., *Comcast Expands Digital Equity Efforts: Installs Free WiFi at 1,000th Lift Zone Community Center* (Dec. 15, 2021), https://corporate.comcast.com/press/releases/comcast-expands-digital-equity-efforts.

events. Comcast also donated over 200 laptops to Minneapolis Parks and Recreation to provide to families, or to use in their computer rooms throughout these community centers.

Along with free Internet connectivity, Lift Zones offer hundreds of hours of free educational and digital skills content. Not only are 50 percent of low-income households in major Comcast markets within walking distance of a Lift Zone, 40 percent of users report that they would not have had Internet access without the Lift Zone, and 58 percent report that the Lift Zone reduces stress for studying, working remotely, and managing online tasks.

Internet Essentials Partnership Program. In addition to IE, the Internet Essentials Partnership Program ("IEPP") is designed to help accelerate Internet adoption and provides the opportunity for school districts and other organizations to fund and quickly connect large numbers of students and families to broadband access. St. Paul Public Schools, Hennepin County, Minneapolis College, Anoka-Hennepin School District, and Northside Achievement Zone are a few of Comcast's IEPP partners in Minnesota.

ACP Support. Among other significant investments in affordability initiatives, Comcast is committed to promoting ACP. Comcast has supported and/or co-hosted nearly 900 ACP sign-up events nationwide since October 2022, resulting in thousands of ACP enrollments. These events have taken place at senior centers, back-to-school fairs, public housing facilities, festivals, fiestas, and parks. In Minnesota, Comcast has partnered with Tickets for Kids to distribute ACP materials to nearly 400 social service agencies and schools and with Greater Twin Cities United Way to provide their 110 partner agencies with materials for Back-to-School backpacks.

As the Draft Plan also acknowledges, a large share of Minnesota's cultural communities today come from other parts of the globe, and therefore language barriers continue to be a challenge As a result, Comcast has translated ACP information into over 30 different languages that we provide at no cost to our community partners for the populations that they serve. In addition, Comcast used local employees that were proficient in certain languages to create videos with basic information on the ACP program, including sign-up instructions. These local ACP videos were created in Korean, American Sign Language, English, Urdu, Punjabi, Hmong (Green), Hmong (White), Spanish, French, Hindi, and Russian. These videos are provided to our local partners and shared with their members.

Other Initiatives: Accessibility. Comcast remains focused on helping members of Covered Populations, including individuals over age 60 and those with disabilities. Comcast partners with organizations such as Al Maa'uun and Gifts for Seniors to provide digital navigation services specifically for homebound seniors. Al Maa'uun has incorporated ACP and digital skills materials into their Meals on Wheels program, and Gifts for Seniors has hired a digital navigator to assist seniors with getting online and accessing telehealth resources. In addition, the Comcast NBCUniversal Foundation recently awarded a $1.3 million two-year grant to Easterseals to expand digital literacy training for young adults with disabilities enrolled in

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Easterseals employment programs.[29] Students with intellectual and/or developmental disabilities ages 16 to 24 will be trained on how to navigate the Internet, communicate through email, create PowerPoint presentations, prepare resumes, use assistive technology, and more.[30]

Final Thoughts

Comcast encourages Minnesota to focus on digital equity efforts that will be the most impactful, including digital navigators, digital skills training programs, and partnerships. Comcast believes that partnerships are paramount to advancing digital equity efforts because closing the digital divide starts at the local level by meeting people where they are and responding to their specific needs. Communities win when the private sector, government, and community organizations join forces to achieve shared goals. To that end, Minnesota should create an inclusive framework that allows many organizations to participate directly in grant programs and that fosters such participation through partnerships and coalitions. As Comcast's more than a decade of dedicated digital adoption and community engagement efforts demonstrate, the private sector has been a critical partner in facilitating digital equity efforts to date. Minnesota's Digital Equity Act implementation should seek to amplify and scale the efforts of these existing successful relationships and ensure that the private sector continues to be a force multiplier for public funding.

Thank you again for the chance to offer our thoughts on the State's Draft Plan. Comcast looks forward to continuing to work with OBD as it refines its Digital Opportunity Plan.

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[29] Press Release, Easterseals, *Easterseals Announces Two-Year Grant of $1.3M From the Comcast NBCUniversal Foundation* (June 7, 2023), https://www.easterseals.com/news-and-stories/press-releases/easterseals-announces-2.html

[30] *Id.*

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Blandin Foundation
Email	jsdavid@blandinfoundation.org
Zipcode	55744
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	5.1.1 - Minnesota's Existing Digital Strengths Consider including https://www.connectedmn.us/ as a resource for digital access and use 5.2.2 - Unsupported Digital Necessities in Rural Areas Advocates and Educators Facing Limited Capacity (p 40) Revise Blandin Broadband Communities Program paragraph: For decades, the Blandin Broadband Communities Program supported dozens of Greater Minnesota cities, counties, and tribes in advancing community-identified technology goals, which leave a legacy of a local leaders who know how to organize for improved technology and a higher understanding and appreciation for broadband especially for residents in rural areas.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas Adults Age 60+ People from Minoritized Racial/Ethnic Groups People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Michael Abensour
Email	michael.abensour@compudopt.org
Zipcode	77009
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	My name is Michael Abensour and I am the Chief Impact Officer for Compudopt, a national 501c3 nonprofit whose mission is to to provide technology access and education to under-resourced youth and their communities. We have been working in the digital inclusion space for over 15 years, and while we originally began as a nonprofit computer refurbisher, we have since expanded into offering a suite of holistic digital inclusion programs that provide an end-to-end set of solutions to overcome the digital divide. Not only have we given tens of thousands of refurbished devices to families, but we also provide digital literacy skill building classes to adults, afterschool STEM programs to youth, as well as connectivity solutions (our own 5G fixed wireless network as well as ACP enrollment) to communities across the country. We applaud Minnesota's Digital Opportunity Plan for its attention to measurable, achievable goals for Minnesotans on the wrong side of the digital divide, especially the goal of achieving 95% device coverage by 2028. We believe devices are the bedrock of any sustainable digital inclusion program, and we offer our assistance to the State of Minnesota in achieving that milestone.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	6: Areas of Alignment

Comment regarding the Digital Opportunity Plan

Your implementation plan rightfully lays out a detailed plan and roadmap for collaboration and stakeholder participation. While Compudopt does not have a physical presence in Minnesota, we consistently offer programming wherever the need is, be it rural/urban/suburban regardless of whether we have ever operated in a particular geography before. Our programs have been designed from the ground up to be scalable, deliverable and affordable. As you implement your various equity and best practice groups around your goals, please keep Compudopt in consideration for partnership and collaboration on areas that overlap with our core strengths: device distributions, digital literacy training, STEM enrichment programs, tech support, Digital Navigation programs, and connectivity.

Optional: Do you identify with any of the following covered populations?

People Living in Rural Areas
People from Minoritized Racial/Ethnic Groups
People with limited English speaking or reading skills
People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	The City of Saint Paul
Email	drew.nelson@ci.stpaul.mn.us
Zipcode	55102
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan

Bree Maki, Director of Office of Broadband Development,

The City of Saint Paul, anchored in Mayor Carter's pillars of economic justice, education, equity, innovation, and resiliency, is committed to achieving full digital inclusion for all residents. We believe that in a city that truly works for everyone, everyone should have unfettered opportunities to work, learn, and access services, regardless of their digital proficiency or the resources at their disposal. In our quest for an equitable distribution of digital resources, collaboration has been key. It's in this collaborative spirit that the "Connectivity Blueprint" was launched in partnership with Ramsey County.

Connectivity Blueprint

Digital inclusion is not merely an infrastructure challenge but is fundamentally tied to an equitable future. The City of Saint Paul and Ramsey County, despite having extensive broadband infrastructure, still grapple with pervasive digital disparities. Alarmingly, those facing these disparities often belong to communities historically marginalized in broader economic contexts. The lessons of the pandemic underscore the vital nature of digital access, and while federal and state policies are rapidly evolving to address these gaps, their efficacy will be determined by their ability to address the nuanced challenges of our diverse communities.

Residents' needs revolve around obtaining and maintaining connectivity, as well as maximizing its utility. As states, including Minnesota, start to develop comprehensive digital equity strategies, it is imperative to craft these plans with the lived experiences of our most vulnerable populations at the forefront. The Connectivity Blueprint, crafted in collaboration with local leaders, articulates recommendations pivotal to this cause. Notably, as we approach a wave of substantial federal investments in digital infrastructure, the emphasis should not merely be on physical connectivity but should prioritize genuine digital equity. This entails a multi-faceted approach: heightened public awareness campaigns, bolstering existing local programs, optimizing federal funding towards genuine digital equity, and advancing policies that ensure universal internet accessibility and affordability. Through these concerted efforts, we can transform digital inclusion from aspiration to reality.

The report is available at https://www.ramseycounty.us/your-government/projects-initiatives/ramsey-connected-computer-internet-resources/connectivity-blueprint. The report touches on many of the areas highlighted in the Office of Broadband Development's Digital Opportunity Plan, and underscores the urgency of getting connected, staying connected, and learning how to use the connection for many in Saint Paul.

About Saint Paul

Saint Paul is a vibrant and diverse city that is comprised of people from many groups directly experiencing challenges with digital connectivity and accessibility: older adults, people of color, veterans, people with disabilities, individuals re-entering society from incarceration, individuals experiencing language barriers, low-income individuals, immigrant and refugee communities, renters and those in multi-family properties, and more. Recognizing this, our strategy to broaden digital opportunities is anchored in the lived experiences and insights of our constituents and neighbors. By centering their voices, we aim to foster greater access and economic justice in an ever-evolving digital economy.

Community Partnerships

We've also chosen to partner with local organizations and other governments whose mission aligns with ours. We have done this through:
• St. Paul Promise Neighborhood
• Hallie Q. Brown
• CLUES
• Saint Paul Chamber
• Saint Paul College
• Saint Paul Public Library
• Ramsey County Opportunity Center
• Dorothy Day Shelter
• Ramsey County Department of Corrections
• Neighborhood House

In alignment with our partners throughout Saint Paul, the Metro area, and Minnesota, we believe policy change is core to addressing many of these issues. We appreciate an acknowledgement about systematic policy issues that may be outside the scope of this plan, and we believe there is broad agreement that without policy change, our broader goals of expanded digital equity and opportunity will ultimately be unreachable.

Our Feedback: Utilize Existing Infrastructure for Digital Equity that is Inclusive of Urban Communities

Our feedback emphasizes the crucial role of partnership and policy in enhancing the impact of this plan across identified groups in Minnesota. While the current plan prioritizes non-competitive grants for areas outside urban centers, it overlooks the dense populations of these groups residing within cities like Saint Paul and other urban communities. By doing so, it misses opportunities to amplify the effects of existing programs and partnerships. The state's draft plan necessitates the creation of additional administrative layers outside these existing partnerships, leading to duplicated services without genuinely extending reach into the communities most in need.

Leveraging and centralizing resources in established service centers, such as libraries and community centers, allows for streamlined, layered service during a single visit, creating a trusted and readily accessible network

between government and Non-Profit Organizations (NPOs). This approach fosters direct and indirect outreach to impacted groups and avoids the unnecessary time and cost involved in creating additional service providers. This direct accessibility and familiarity enhance agility and responsiveness to the dynamic needs of these populations, facilitated by culturally familiar professionals.

For impactful and lasting change in bridging the digital divide and expanding digital opportunity, local policies and existing administrative functions play a crucial role, especially when one-time federal funds are depleted. We advocate for the state to allocate funding efficiently by enhancing proven programs within existing organizations to meet the prevalent challenges across Minnesota, focusing on local regulations and needs, ensuring the sustainability and effectiveness of digital equity initiatives.

Thank you, and a copy of this feedback has been mailed as well and this feedback is pertinent to multiple sections of the plan.

Drew Nelson
Deputy Director, Office of Technology and Communications, City of Saint Paul
Co-chair, Ramsey County and Saint Paul's Connectivity Blueprint

Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	Adults Age 60+ People from Minoritized Racial/Ethnic Groups Veterans People with Disabilities People who are Incarcerated or Re-Entering Society People with limited English speaking or reading skills People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Don Frederiksen
Email	don@seniortechclub.com
Zipcode	55418
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation

Comment regarding the Digital Opportunity Plan

At a high level, I found the Opportunity Plan draft a remarkable document. Having actively participated in the Gifts for Senior's DCC and having interacted with Hannah, I am in simply in awe. This is an awesome effort. Thank you for the dedication, breadth and focus.

On the implementation, from my perspective of working with a small organization like Gifts for Seniors as it looks to expand its program, it is so clear that the following statement from the draft plan is critical.

"OBD aims to continue prioritizing authenticity, cooperation, and relationship-building while implementing this plan."

Smaller organizations cannot do it all. The four activities as identified in section 6.2.3 of the draft seem out of reach for a single organization. Small organizations must seek to collaborate with other resources.

But as necessary that collaboration is, it is also time and energy consuming. It also requires visibility to the capabilities and mission of possible collaborators. Knowing who else is working in a relevant area seems like a simple question but is can be difficult to answer at a local level.

With this backdrop, I hope that special provisions are built into the implemention plan that supports the easy and open sharing of resources. I don't have many specific ideas but my thinking might include funding for Senior LinkAge types of resources that focus on helping organizations collaborate to achieve the Opportunity mission. If there are competitive grant programs, perhaps special consideration is given to organizations that seek to collaborate.

The draft plan definitely talks about the need for collaboration and I propose that it is important the the final plan look to support collaboration between DCC's and other resources across the state.

Collaboration is so key to our shared success.

Is there an additional section you would like to comment on?

No

Optional: Do you identify with any of the following covered populations?

Adults Age 60+

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Ameelio
Email	nick@ameelio.org
Zipcode	23235
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	1: Introduction
Comment regarding the Digital Opportunity Plan	Ameelio commends Minnesota's Office of Broadband Development (OBD) for opening up this plan with the following quote: "I think everyone should have equal access to internet connectivity. It's an essential part of life in this day and age, and not having internet really inhibits opportunities for people." As the only non-profit provider of both communication and education technology in the correctional industry, we firmly believe that access to technology is fundamental to the successful rehabilitation of incarcerated individuals. To that end, we strongly support the inclusion of incarcerated individuals as a covered population under the Digital Equity Act, as well as OBD's decision to include several specific sections throughout this report dedicated to advancing equity for them.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	2: Planning Process: The Minnesota Model

Comment regarding the Digital Opportunity Plan

While we understand that both the formal survey period and public comment period has ended, we would recommend that going forward, to the extent possible, OBD consider ways to solicit feedback from both currently incarcerated individuals, and recently released individuals, to inform the planning process for a final draft. This is particularly important, given their status as a covered population under the Digital Equity Act.

One potential option is to facilitate the formation of a Digital Connection Committee (DCC) made up of incarcerated individuals. These individuals would obviously be significantly limited in their ability to meet and document their findings in any sort of consistent manner, but one possibility is for OBD to coordinate with the Minnesota Department of Correction (MNDOC) to support the formation of a limited number of DCCs across the state.

Is there an additional section you would like to comment on?

Yes

Which section of the plan does your comment address?

4: Goals

Comment regarding the Digital Opportunity Plan

Ameelio commends the inclusion of formerly incarcerated people in Goal 3.3.1, which aims "to ensure formerly incarcerated Minnesotans who are re-entering society receive full reentry support connecting them to digital technologies when legally permissible." However, we believe it is vital that currently incarcerated individuals are also included in such a goal, and recommend the goal be amended to include both "formerly and currently incarcerated Minnesotans".

Is there an additional section you would like to comment on?

Yes

Which section of the plan does your comment address?

3: The Current State of Digital Opportunity

Comment regarding the Digital Opportunity Plan

We wholeheartedly agree with the statement in Section 5.7 that "People who are incarcerated must essentially put their technology skills on hold during their detainment." We believe it is essential for a successful reentry that incarcerated people are allowed access to modern technologies during their incarceration, rather than after. This is especially true when it comes to finding gainful employment, given the vital role that technology now plays in not just our day-to-day work lives, but also in the job search and application process.

In Section 5.7.2 (Unsupported Digital Necessities for People Who are Incarcerated or Re-Entering Society), we suggest adding an additional section on the topic of Network Infrastructure and Access in Correctional Facilities. Unlike most of us, who have a choice over network providers, internet speed, and security setup, incarcerated individuals are often subject to outdated network infrastructure. Many correctional facilities today still rely on decades-old wiring, with download speeds as low as 10 Mbps. Compare that with the ones in most modern internet plans, which support 1,000 Mbps speed.

Insufficient network speeds can result in low-quality video calling and voice calling solutions, hindering the ability for incarcerated individuals to access digital resources, including video calling, voice calling, and educational programming. This can manifest in dropped calls or slow download speeds of educational videos. In a survey conducted in California, 97 percent of family members who have incarcerated loved ones in state prisons (currently contracts with ViaPath for service) have regular connectivity issues. The issue is particularly impactful for tablet-based communications. Users are reporting that about 70 percent of the calls "go silent at one point or just hang up." (Source: Empowering Women Impacted by Incarceration (EWII), CDCR/ViaPath Communication Challenges Survey, 2023.)

Outdated network infrastructure in correctional facilities further limits the extent to which incarcerated individuals can access and engage with modern digital technologies, including educational resources, the vast majority of which are available exclusively online. (Source: Moraff, Christopher. July 9, 2016. Digitizing the 21st-Century Prison. Next City.)

Further complicating the problem of inadequate network infrastructure is the manner in which prisons and jails contract out for their network infrastructure. In many cases, these facilities do not own, but instead lease their network maintenance, equipment and assessment. This is particularly prevalent among county jails, where facilities are often faced with steep budget shortfalls. This lack of ownership results in a lack of competition, control and oversight, placing them in the undesirable position of needing to either procure another vendor to install a new network at the end of the current contract, or continue contracting with the existing vendor. This lack of competition then contributes to the low-quality network services already prevalent in most prisons and jails.

Prisons and jails are further incentivized to adhere to this leasing model thanks to the practice of for-profit companies offering to provide the networks "at no cost" to the agency. Instead, these companies subsidize the cost of providing this network equipment using the revenue generated from the phone calls and video calls made by incarcerated individuals. In doing so, incarcerated individuals are forced to subsidize the very networks that are often leading to inadequate services.

We suggest that the plan recommended correctional facilities pursue ownership over their networks, rather than contract it out to third parties. It is more advantageous for DOCs to own their network infrastructure, as this grants a higher level of independence and control over their operations, allowing them to tailor their network infrastructure to meet their specific needs, ensuring seamless communication, data management, cybersecurity practices, and information flow within the correctional system. This not only improves overall efficiency but also enables agencies to adapt swiftly to changing circumstances and emerging technologies.

In the final bullet of Section 5.7.3 (Systemic Challenges Impeding Digital Opportunity for People Who are Incarcerated or Re-Entering Society), the plan points out that "people who have been incarcerated experience lower rates of recidivism when they have comprehensive access to mental healthcare, educational opportunities, and career training during their prison sentence and following their release." We wholeheartedly agree with this statement, but would suggest also including access to "communication with friends and family" in that list of resources.

Digital equity efforts within correctional facilities can greatly enhance opportunities for communication between incarcerated individuals and their families. Access to email, video calls, and virtual visitations can foster healthy relationships, support mental well-being, and contribute to smoother reintegration processes post-release. Improved communication with families can also lead to better post-release outcomes. A research study published in the Journal of Offender Rehabilitation revealed that strong family connections reduced the likelihood of recidivism by 22 percent. (Source: The Importance of Family Support for Incarcerated Individuals: A Comparative Study of Perceived Social Support. 2018. Journal of Offender Rehabilitation.) Many studies have pointed to the positive effect of visitation, both in-person and virtual, on an individuals' likelihood to recidivate. (Source: Wang, Leah. December 21, 2021. Research roundup: The positive impacts of family contact for incarcerated people and their families. Prison Policy Initiative.)
 In a study by MNDOC, it was found that inmates who maintain regular communication with their families are 13 percent less likely to be involved in disciplinary incidents within the correctional facility. (Source: Reentry Guide: For People Returning to Minnesota Communities from Correctional Facilities. 2020. Minnesota Department of Corrections). And with

Minnesota's recent decision to make phone calls free, with video calls potentially free in some facilities, ensuring facilities have sufficient bandwidth and technology to support this expansion in communication is vital.

Is there an additional section you would like to comment on? Yes

Which section of the plan does your comment address? 6: Areas of Alignment

Comment regarding the Digital Opportunity Plan In Section 6.1.2 (Inter-Agency Digital Opportunity Workgroup), we strongly encourage that MNDOC, as well as organizations providing services for incarcerated individuals on the ground, be included in any future re-forming of the Workgroup. Given the almost complete inability for an incarcerated individual to actively participate in an OBD listening session, or the existence of any DCCs representing incarcerated individuals, the participation of these organizations in the Workgroup will be vital in ensuring that the state's final plan reflects their unique needs and challenges.

Table of contents

01. Ameelio Introduction

27 million Americans have a family member incarcerated.

They are spending more than **$300 a month** to stay connected with their loved ones.

1 in 3 of them is forced into debt.

Ameelio was founded to **solve this problem.**

Our Mission

We're on a mission to **fundamentally transform corrections** in the United States, and disrupt the prison telecommunications industry across the country.

We achieve the mission by **empowering the incarcerated individuals** with vital tools to rebuild their lives.

Who we are

We are the **only nonprofit** provider and the most innovative company in the industry.

We build **communication and education solutions** for incarcerated people and their families and we provide them **for free**.

We are providing solutions in seven states — Iowa, Colorado, Maine, Rhode Island, Mississippi, Indiana, and Illinois. We are also launching a pilot on family and legal communication with San Francisco Sheriff's Office.

02 . How are incarcerated individuals

experiencing the digital divide?

There are approximately 18,000 incarcerated people in Minnesota. They live in both state prisons and county jails.

Unlike the rest of us, they have no choice over network providers, internet speed, quality, or availability.

Prisons & Jails

- **Lack of network ownership** stifles competition in software and hardware providers

- **Outdated, insecure network** infrastructure results in low-quality connections.

- Prison networks used as **profit-generating tools** of exploitative providers.

People Behind Bars

- Having to pay the hidden and **inflated price for internet**.

- **Lack of access to digital tools**, such as video calls, data transfer, music and e-book downloads.

- Connectivity issues **lower call quality** - dropping, breaking up, merging with other calls, etc.

- **Ill-prepared for reentry** due to unfamiliarity with modern technology.

03. Recommendations for MN Office of Broadband Development

Latest draft is a huge step in the right direction

The latest draft of the Minnesota Digital Opportunity Plan includes multiple sections dedicated specifically to discussing incarcerated individuals.

- ❖ **Existing initiatives to strengthen digital equity among incarcerated individuals**, including provision of free calls, educational services, and tablets.

- ❖ **Recognition of gaps in current digital resources available to incarcerated individuals**, including internet access and digital literacy.

- ❖ **Systemic challenges faced by incarcerated individuals**, including poverty and racial discrimination.

The Digital Equity Act requires a high-level statewide digital inclusion assessment as well as individual assessments of each of the following eight covered populations. These are groups of people who, due to systemic challenges, may face disproportionately low rates of digital inclusion when compared to the overall U.S. population. This list is copied verbatim from the State Digital Equity Planning Grant NOFO:

(1) Individuals who live in covered households;[31]
(2) Aging individuals;[32]
(3) Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;
(4) Veterans;[33]
(5) Individuals with disabilities;[34]
(6) Individuals with a language barrier, including individuals who
   a. Are English learners; and
   b. Have low levels of literacy;
(7) Individuals who are members of a racial or ethnic minority group; and
(8) Individuals who primarily reside in a rural area.[35]

However, even though the incarcerated population is named as one of the **8 covered populations** in the DEA guideline,

It does not appear that any of the 95 DCCs formed in MN represent a correctional facility or related non-profit organization.
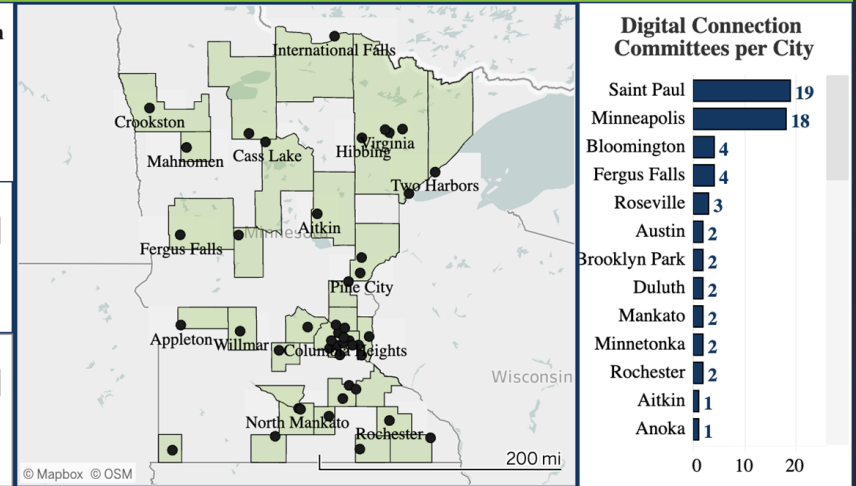
Recommendations to improve representation of incarcerated individuals

❖ **Collect feedback directly from currently incarcerated individuals**, whether through survey or state-led focus groups.
  ➢ In Section 6.1.2 (Inter-Agency Digital Opportunity Workgroup), we strongly encourage that MNDOC be included in any future re-forming of the Workgroup.

❖ **Include prisons, jails, resource providers and community groups** for the incarcerated population as stakeholders in the digital equity ecosystem mapping.
  ➢ We encourage OBD to offer assistance to incarcerated individuals who may be interested in forming a DCC.

❖ **Produce a digital equity-focused engagement event** or planning workshop in prisons and jails:

Recommendations to improve access to digital services

- ❖ Consider correctional facilities as **community anchor institutions** in network planning and rollout.

- ❖ **Drive procurement** through the lens of promoting digital equity and encourage new technologies.
  - ➢ Ex: PA's RFP favored vendors willing to share their network with others, even those in direct competition

- ❖ Contract with an external entity to do a **network assessment** for correctional facilities.
  - ➢ Add an additional section on the topic of *Network Infrastructure and Access in Correctional Facilities* to Section 5.7.2

97% of family members have regular connectivity issues

No, 35, 3%

Yes, 1073, 97%

Both, 162, 16%

Phone, 281, 28%

Tablet, 576, 56%
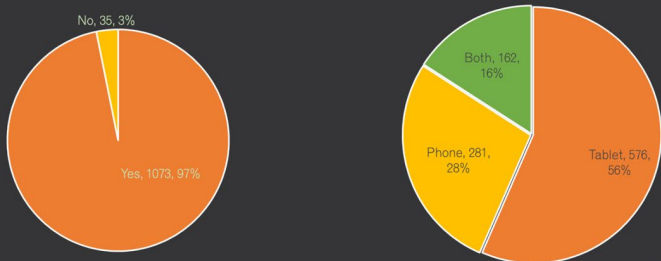
Participant Response:

"Tablet: getting dropped, cutting out, going silent, lines being crossed so you'd sudde
different person, plus there is a time lag between him and I speaking. I'd say about 70'
calls go silent at one point or just hang up.

Wall phone: less problematic, sometimes it won't connect but other than that they worl

97% of family members
of incarcerated people in California experience regular connectivity issues.

85% of participants experience issues accepting phone calls and/or video calls

No, 175, 15%

Yes , 974, 85%

What kinds of issues?

Freezing

Pressing "5" to accept the call is unsuccessful

Call or video hangs up before connection

Issues regarding video not working

0%   20%   40%   60%
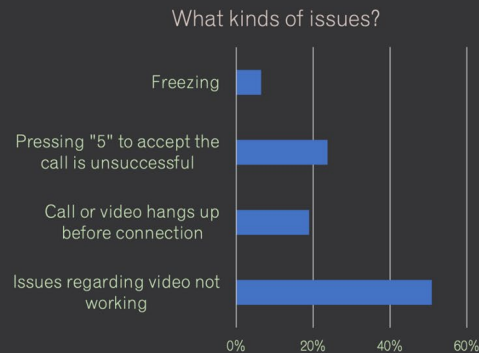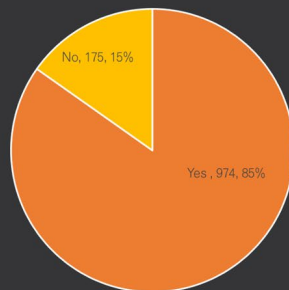
85% of family members
experience issues accepting phone or video calls from incarcerated loved ones

Recommendations to improve affordability of digital services

❖ **Investigate the hidden costs of digital access and other cost-driving services.**

   For example, while recent legislation made calls free for incarcerated individuals, the current provider will likely continue to charge exorbitant fees to the state to maximize its profits.

   They may look to increase profits in other areas as well, for example by increasing the cost of educational programming or other tablet-based services.

Recommendations to improve implementation of new digital services

- ❖ Add a **digital navigator** in the jails and prisons.

- ❖ **Include funding** for critical digital skills training and support, specifically for incarcerated individuals.

- ❖ **Incentivize publicly owned network infrastructure and devices**; Ensure that correctional facilities keep up with network quality standards set forth by the state.

Recommendations to ensure *all* incarcerated individuals are included

- ❖ Where possible, we recommend modifying language focusing on **formerly incarcerated Minnesotans who are re-entering society** to also include **currently incarcerated Minnesotans.** (Ex: Goal 3.3.1)

- ❖ It is already incredibly difficult to attain work for formerly incarcerated individuals. Often, waiting until release to provide these individuals with digital resources may be too late.

04. Why is it important to include incarcerated individuals in Digital Equity Plans?

Accessing digital services is not only the moral thing to do, but also has clear, quantifiable benefits to incarcerated individuals, their communities and our society as a whole.

<u>Promoting Education and Skill Development</u>

Providing access to digital tools and educational resources can empower incarcerated individuals with valuable skills, improving their chances of successful reintegration into society upon release.

Incarcerated individuals who have access to digital learning opportunities are **30% more likely to enroll in post-secondary education** after release.

Incarcerated individuals who participate in educational programs while in prison are **43% less likely to return to prison upon release.**

Enhancing Communication and Family Ties

Access to email, video calls, and virtual visitations can foster healthy relationships, support mental well-being, and contribute to smoother reintegration processes post-release.

A research study published in the Journal of Offender Rehabilitation revealed that strong family connections **reduced the likelihood of recidivism by 22%.**

A study by the Minnesota Department of Corrections found that inmates who maintain regular communication with their families are **13% less likely to be involved in disciplinary incidents** within the correctional facility.

Reducing Isolation and Disparities

Addressing the digital divide within correctional facilities can contribute to reducing disparities and foster a more inclusive society.

According to a survey conducted by the American Civil Liberties Union (ACLU), **67%** of incarcerated individuals reported **feeling more connected to the outside world** after gaining access to digital communication tools.

Additionally, correctional facilities with digital equity initiatives experienced a **15% decrease in reported inmate-on-inmate incidents**.

Preparing for Reentry

Online job searches, resume building, and access to online job applications can enhance post-release employment prospects and reduce the likelihood of reoffending.

According to the National Institute of Justice, access to technology and job-related digital skills can **increase post-release employment rates by 28%.**

MN Digital Opportunity Plan Review

Note: These comments were submitted to the Office of Broadband Development on September 29, 2023. This document has been created to share directly with OBD staff for a meeting with Ameelio's staff on October 3, 2023.

Comments, by section:

Handout: Executive summary

No comment

1: Introduction

We commend Minnesota's Office of Broadband Development (OBD) for opening up this plan with the following quote: "I think everyone should have equal access to internet connectivity. It's an essential part of life in this day and age, and not having internet really inhibits opportunities for people."

As the only non-profit provider of both communication *and* education technology in the correctional industry, we firmly believe that access to technology is fundamental to the successful rehabilitation of incarcerated individuals. To that end, we strongly support the inclusion of incarcerated individuals as a covered population under the Digital Equity Act, as well as OBD's decision to include several specific sections throughout this report dedicated to advancing equity for them.

2: Planning Process: The Minnesota Model

While we understand that both the formal survey period and public comment period has ended, we would recommend that going forward, to the extent possible, OBD consider ways to solicit feedback from both currently incarcerated individuals, and recently released individuals, to inform the planning process for a final draft. This is particularly important, given their status as a covered population under the Digital Equity Act.

One potential option is to facilitate the formation of a Digital Connection Committee (DCC) made up of incarcerated individuals. These individuals would obviously be significantly limited in their ability to meet and document their findings in any sort of consistent manner, but one possibility is for OBD to coordinate with the Minnesota Department of Correction (MNDOC) to support the formation of a limited number of DCCs across the state.

3: Goals

Ameelio commends the inclusion of formerly incarcerated people in Goal 3.3.1, which aims "to ensure formerly incarcerated Minnesotans who are re-entering society receive full reentry support connecting them to digital technologies when legally permissible." However, we believe it is vital that *currently* incarcerated individuals are also included in such a goal, and recommend the goal be amended to include both "formerly and currently incarcerated Minnesotans".

4: Implementation

No comment.

5: The Current State of Digital Opportunity

We wholeheartedly agree with the statement in Section 5.7 that "People who are incarcerated must essentially put their technology skills on hold during their detainment." We believe it is essential for a successful reentry that incarcerated people are allowed access to modern technologies *during* their incarceration, rather than after. This is especially true when it comes to finding gainful employment, given the vital role that technology now plays in not just our day-to-day work lives, but also in the job search and application process.

In Section 5.7.2 (Unsupported Digital Necessities for People Who are Incarcerated or Re-Entering Society), we suggest adding an additional section on the topic of *Network Infrastructure and Access in Correctional Facilities*. Unlike most of us, who have a choice over network providers, internet speed, and security setup, incarcerated individuals are often subject to outdated network infrastructure. Many correctional facilities today still rely on decades-old wiring, with download speeds as low as 10 Mbps. Compare that with the ones in most modern internet plans, which support 1,000 Mbps speed.

Insufficient network speeds can result in low-quality video calling and voice calling solutions, hindering the ability for incarcerated individuals to access digital resources, including video calling, voice calling, and educational programming. This can manifest in dropped calls or slow download speeds of educational videos. In a survey conducted in California, 97 percent of family members who have incarcerated loved ones in state prisons (currently contracts with ViaPath for service) have regular connectivity issues. The issue is particularly impactful for tablet-based communications. Users are reporting that about 70 percent of the calls "go silent at one point or just hang up."[1]

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[1] Empowering Women Impacted by Incarceration (EWII), CDCR/ViaPath Communication Challenges survey, 2023

Outdated network infrastructure in correctional facilities further limits the extent to which incarcerated individuals can access and engage with modern digital technologies, including educational resources, the vast majority of which are available exclusively online.[2]

Further complicating the problem of inadequate network infrastructure is the manner in which prisons and jails contract out for their network infrastructure. In many cases, these facilities do not own, but instead lease their network maintenance, equipment and assessment. This is particularly prevalent among county jails, where facilities are often faced with steep budget shortfalls. This lack of ownership results in a lack of competition, control and oversight, placing them in the undesirable position of needing to either procure another vendor to install a new network at the end of the current contract, or continue contracting with the existing vendor. This lack of competition then contributes to the low-quality network services already prevalent in most prisons and jails.

Prisons and jails are further incentivized to adhere to this leasing model thanks to the practice of for-profit companies offering to provide the networks "at no cost" to the agency. Instead, these companies subsidize the cost of providing this network equipment using the revenue generated from the phone calls and video calls made by incarcerated individuals. In doing so, incarcerated individuals are forced to subsidize the very networks that are often leading to inadequate services.

We suggest that the plan recommended correctional facilities pursue ownership over their networks, rather than contract it out to third parties. It is more advantageous for DOCs to own their network infrastructure, as this grants a higher level of independence and control over their operations, allowing them to tailor their network infrastructure to meet their specific needs, ensuring seamless communication, data management, cybersecurity practices, and information flow within the correctional system. This not only improves overall efficiency but also enables agencies to adapt swiftly to changing circumstances and emerging technologies.

In the final bullet of Section 5.7.3 (Systemic Challenges Impeding Digital Opportunity for People Who are Incarcerated or Re-Entering Society), the plan points out that "people who have been incarcerated experience lower rates of recidivism when they have comprehensive access to mental healthcare, educational opportunities, and career training during their prison sentence and following their release." We wholeheartedly agree with this statement, but would suggest also including access to "communication with friends and family" in that list of resources.

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[2] Moraff, Christopher. (July 9, 2016). *Digitizing the 21st-Century Prison*. Next City.

Digital equity efforts within correctional facilities can greatly enhance opportunities for communication between incarcerated individuals and their families. Access to email, video calls, and virtual visitations can foster healthy relationships, support mental well-being, and contribute to smoother reintegration processes post-release. Improved communication with families can also lead to better post-release outcomes. A research study published in the Journal of Offender Rehabilitation revealed that strong family connections reduced the likelihood of recidivism by 22 percent.[3] Many studies have pointed to the positive effect of visitation, both in-person and virtual, on an individuals' likelihood to recidivate.[4] In a study by MNDOC, it was found that inmates who maintain regular communication with their families are 13 percent less likely to be involved in disciplinary incidents within the correctional facility.[5] And with Minnesota's recent decision to make phone calls free, with video calls potentially free in some facilities, ensuring facilities have sufficient bandwidth and technology to support this expansion in communication is vital.

6: Areas of Alignment

In Section 6.1.2 (Inter-Agency Digital Opportunity Workgroup), we strongly encourage that MNDOC, as well as organizations providing services for incarcerated individuals on the ground, be included in any future re-forming of the Workgroup. Given the almost complete inability for an incarcerated individual to actively participate in an OBD listening session, or the existence of any DCCs representing incarcerated individuals, the participation of these organizations in the Workgroup will be vital in ensuring that the state's final plan reflects their unique needs and challenges.

7: Conclusion

No comment.

Appendices A B, C

Ameelio would be more than happy to be added to the list of 'Additional Contacts' in Appendix B by meeting with staff from OBD in the next phase of the plan's development. We have worked with staff in multiple states this year to offer our unique perspective as a non-profit provider of correctional technologies in advocating for the inclusion (or increased inclusion) of incarcerated individuals in every state's digital equity plan.

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[3] (2018). *The Importance of Family Support for Incarcerated Individuals: A Comparative Study of Perceived Social Support*. Journal of Offender Rehabilitation.
[4] Wang, Leah. (December 21, 2021). *Research roundup: The positive impacts of family contact for incarcerated people and their families.* Prison Policy Initiative.
[5] (2020) *Reentry Guide: For People Returning to Minnesota Communities from Correctional Facilities*. Minnesota Department of Corrections.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	City of St. Louis Park
Email	jsmith@stlouisparkmn.gov
Zipcode	55416
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	Handout: Executive summary

Comment regarding the Digital Opportunity Plan

This Digital Opportunity Plan is in line with feedback we've heard from St. Louis Park residents through a variety of input opportunities.

According to American Community Survey data, 95.45% of St. Louis Park's 24,135 households had a computer and 92.2% of households had a broadband internet subscription in the years 2017-2021.

However, the gap in both these number decreases in six Census tracts (approximately 10,000 households) with higher proportions of residents who identify as Black, indigenous and people of color; who have immigrated since 2010; who are ages 65 and over; who report speaking English less than "very well;" and median household income of $56,346 - $63,750. In these tracts, households reporting they have no internet subscription dips to as low as 83.6%; while households reporting they have no computer drops to a low of 88.5%.

While the numbers in these six Census tracts may still seem high, the need for increased computer and internet access was highlighted during the pandemic when some senior residents were unable to access online programming at the local senior center; or students were using WiFi hotspots at fast food restaurants to complete assignments; or adults were unable to access online resources. The pandemic accelerated even more the dependence on and need for technology access.

Prior to Comcast franchise renewal in 2021, a consultant conducted a community needs assessment for the City of St. Louis Park. They held three in-person focus group workshops, attended by 54 people representing city staff, elected officials, boards and commissions members, local businesses, nonprofit organizations, public and private schools and residents. An additional online survey garnered 536 responses representing a wide swath of the community.

While many of the questions were focused on Comcast and cable service, questions were asked about interest in city-offered media-related workshops; computer and internet access; and computer and software training. Results included the following for respondents saying "yes" or "maybe" to these options:
• 60.3% - Workshops on different types of media
• 53% - Free access to computers and the internet
• 51.1% - Computer and software training

In promoting the Affordable Connectivity Plan (ACP), city staff discovered that informing people of the plan was only the first step. Many people needed in-person help to navigate the process of applying for the ACP.

For many years, a city staff person ran a Computer Buddies course at the local senior center out of his own interest. That course has ended with the retirement of that employee. We continue to receive calls from seniors looking for help with basic computer needs, and have to refer them to

private services that are not financially accessible to everyone.

US Internet is conducting a three-year expansion in St. Louis Park, with a goal to offer fiber to the premise (FTTP) high-speed internet to all households. The City of St. Louis Park entered into an agreement with US Internet in 2017, allowing US Internet to lease city-owned fiber infrastructure and space to rack equipment in three city buildings.

As part of the agreement and to address equity issues in access to internet service, US Internet first offered service at Meadowbrook Manor (now Edge on Excelsior), then to other multi-unit residential buildings and commercial buildings. In 2019 they began to offer service in the south Sorensen neighborhood, a largely single-family home area. In late 2021, US Internet purchased property in St. Louis Park to build a data center and central office from which to distribute fiber. Their first big year of expansion was in 2022, completing 24 phases of six-block areas. Another 23 phases have conduit complete and are awaiting backbone, splices or fiber. US Internet plans to pass every residential and non-residential property in the city with fiber and its service offering by the end of 2024.

Related to equity in broadband access, the CDC's Social Vulnerability Index shows two census tracts in St. Louis Park ranking in the highest level of need based on income; access to food, transportation and healthcare, and other livability factors. Twenty-five percent of these tracts are in the first portion of US Internet's expansion plan, with the remainder to be included as the project continues.

While this project may bring lower-cost internet options to residents, many residents will still need help with acquiring equipment or with digital education. A recently received $89,000 grant through the Hennepin County Municipal Broadband Expansion Fund is designed to begin to address in 2024. If that effort is successful, sustained funding will be needed to continue and expand offerings. This plan and its associated grant ideas could be big help for that.

This Digital Opportunity Plan is exciting and will be of benefit to all of Minnesota, including those populations in the suburbs who may be overlooked.

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	League of MInnesota Cities
Email	khartnett@lmc.org
Zipcode	55103
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity

Comment regarding the Digital Opportunity Plan

he League of Minnesota Cities ("LMC") is a membership association dedicated to promoting excellence in local government. LMC, governed by a Board of Directors consisting of local elected and appointed city officials, serves its more than 800 member cities through advocacy, education and training, policy development, risk management, and other services. In addition to concurring with the comments made by the City of Minneapolis; Northwest Suburbs Cable Communications Commission; North Metro Telecommunications Commission; South Washington County Telecommunications Commission; North Suburban Communications Commission; City of Coon Rapids, Minnesota; and City of Columbia Heights ("Local Governments"), LMC respectfully submits the following comments to the Office of Broadband Development ("OBD") for consideration in implementing the OBD Digital Opportunity Plan.

LMC agrees with the Local Governments in recognizing the need for local franchising to ensure broadband opportunities throughout the state. In addition to the comments made by Local Governments, LMC notes that local franchising of broadband services would allow local jurisdictions to ensure buildout of broadband services to underserved areas. Franchising allows local jurisdictions to efficiently determine local needs and ensure that those needs are met by requiring sufficient buildout.

In addition, local franchising can be used as an alternative to the State's grant programs to encourage sufficient buildout. Local franchising would be another tool in the toolbox for local jurisdictions to encourage providers to service underserved areas.

It is important to note that franchising is more than local jurisdictions simply collecting fees as compensation for private internet providers who use the public's right of way as part of their business. Local franchising for cable services, for example, is a negotiation that not only includes fees but also includes buildout requirements and public services. If used for broadband services, these negotiations could lead to local jurisdictions working with providers to ensure the goals of the OBD Digital Opportunity Plan are met. Broadband franchising would be an invaluable tool allowing local jurisdictions the flexibility to meet the needs of the OBD Digital Opportunity Plan.

Is there an additional section you would like to comment on?   No

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Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	MDE/Pacer DCC
Email	jeff.plaman@state.mn.us
Zipcode	55113
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan	3.1 | Goal 1: Connect People to People 3.1.1 - 2c add schools and service coops to the list of organizations that have access to pilot digital navigator positions SCHOOLS and LIBRARIES are not targeted specifically: 3.1.1 - 2 All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity. Digital Navigation programs coordinated by schools and libraries present a big opportunity which also can connect youth to career pathways. 3.1.1 - 2 All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity. Administer grants designed to support digital navigation services, targeting rural cities, rural counties, and organizations that both represent and serve covered populations. 3.1.1 - 3 All Minnesotans have access to a trusted provider of quality technical support. Develop curriculum and administer grants designed to support high schools, after-school programs, and 2-year public and tribal colleges in hiring and training students to work part-time as paid tech repair technicians. 3.2 | Goal 2: Connect People to Information 3.2.1 - 2, 3 Districts and charter schools are not always plugged into township, city, or county government, they need support to redesign websites, and a push to consider digital opportunity in their planning and creating of resources for students and families. Website redesign - accessibility: schools not mentioned. (3.2.1 - 3) 3.2.1 School districts - develop a Digital Opportunity Plan (add as a grant requirement for local govts?) 3.3 | Goal 3: Connect People to Resources 3.3.1 - How does connecting K-12 students to resources factor into this plan? Particularly at least students in grades 6 and above need access to a large screen device. Not all schools provide this some are still operating in a BYOD situation. Adult centered - BYOD a problem in a lot of schools. Include students in the statement "access to a large screen device." 3.3.1 - 2 - Include STUDENTS in option to afford a large screen device. 3.3.1 - 3 - include Homeless/Highly Mobile, McKinney-Vento Students Students experience homelessness and students in foster care - support for technology/internet resources follow the students around - build off the physical transportation guarantee. (3.3.1 - 3)
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	5: Implementation

Comment regarding the Digital Opportunity Plan

Digital literacy skills and access are increasingly essential to navigate and succeed in Minnesota. The Adult Education (ABE) field is excited to help build digital literacy skills and access across Minnesota. Minnesota Adult Education (ABE) adopted the Northstar Digital Literacy Standards as one of our sets of content standards, acknowledging the importance of integrating digital literacy into the educational and career preparation work we do. In reviewing the plan, the Adult Education team at the Minnesota Department Of Education had some questions and comments:

Adult education (ABE) is providing digital literacy instruction with our services. Yet, we do not see ABE included as a collaborative named partner in this work. For example, ABE is not mentioned in the advocates and educators section page 37-38.

The draft plan notes that "CareerForce as providing in-person and virtual services, including a variety of classes to develop career seekers' digital skills" (p. 38). We would like to note that ABE is working with CareerForce to help provide basic digital skills training. Unfortunately, since CareerForce has shifted their service delivery model to include virtual delivery, this has sometimes created a barrier for some in accessing CareerForce services. That shows the need for digital skills instruction and adult education (ABE) would like to continue to be a part of that work.

Several potential partners are not included in the plan, especially in the education sector.

Community Education is missing as potential advocate to provide services in local communities.

How can community colleges, located in so many communities, support this endeavor? Minnesota's postsecondary institutions should be considered as resources.

The Minnesota Career Education Center (MCEC) provides Adult Basic Education (ABE) services at nine state prison locations. Programs have classroom computers to allow students access to online software programs. Additionally, learners have access to high-quality academic and legal research databases.

The plan notes that the Minnesota Department of Corrections provides tablets for all incarcerated students. In partnership, MCEC ensures effective ABE content is available on these tablets to enhance distance learning and hybrid learning options. Is this accurate with ABE programs and learners at all facilities?

With the focus on "People from Minoritized Racial and Ethnic Groups," it is important to include low literacy and those who do not read or speak English. About half Minnesota Adult Education (ABE) participants are people who are English learners. The vast majority (an estimated 80%) of Minnesota Adult Education (ABE) participants identify as: Black, African, or African American; Hispanic or Latinx; Asian; Native American or American Indian; and/or two or more races or ethnicities (utilizing federal race and ethnicity categories).

To get real input from people who do not speak English information needs to be translated into many languages. Translators hopefully will be

available at focus groups. The $4,000 provided for DCC does not cover this need statewide.

The statewide tech help line that is proposed should be multilingual. Other states, like Washington, and entities, like World Education, have some strong plans and strategies, too. We encourage Minnesota to consult with other states and review other states' plans so we can focus on increasing both digital access and skills for all Minnesotans.

Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	5: Implementation
Comment regarding the Digital Opportunity Plan	Youth, schools, and libraries can have a greater role in benefiting from and supporting digital inclusion in Minnesota. We recommend that digital literacy education and leadership by the state education agency be clearly articulated in the state's digital opportunity plan. Lack of a statewide educational technology leader position makes coordinating this kind of work difficult.

SCHOOLS and LIBRARIES are not targeted specifically: 3.1.1 - 2 All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity. Digital Navigation programs coordinated by schools and libraries present a big opportunity which also can connect youth to career pathways.

Students experience homelessness and students in foster care - support for technology/internet resources follow the students around - build off the physical transportation guarantee. (3.3.1 - 3) |
| **Is there an additional section you would like to comment on?** | No |
| **Optional: Do you identify with any of the following covered populations?** | People Living in Rural Areas
People from Minoritized Racial/Ethnic Groups
People with Disabilities
People who are Incarcerated or Re-Entering Society
People with limited English speaking or reading skills
People in Low-Income Households |

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Literacy Minnesota
Email	enesheim@literacymn.org
Zipcode	55114
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	The plan is well written and fairly comprehensive but there are a few obvious things that weren't included. There needs to be more specifics and more mention of skills training and support of devices. The plan mentions Northstar Digital literacy assessment briefly but Northstar or an equivalent product should be used across the state for assessment and skills building. DEED helped build Northstar many years ago but very few workforce centers use it. Those that do, use it on their own, not part of the wider system. Workforce systems, library systems and community college systems across the country are using Northstar for assessment and skills building. I'd hate to see Minnesota left behind. Adult Basic Education can be a key partner in this work but is not mentioned in any significant way. Please say more about digital navigation and how community programs can plan a key role in that work.
Is there an additional section you would like to comment on?	No

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Matt Rantala
Email	mrantala@co.carver.mn.us
Zipcode	55375
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation

Comment regarding the Digital Opportunity Plan	A couple of the Activities (1.2.b on page 24 and 3.1.a on page 26) seem to be targeted at ISPs receiving grants through OBD. I would suggest attempting to include ISPs that have not received grants. I have heard ISPs talk about having difficulties in getting potential subscribers who would be ACP eligible.
	While the value of digital navigators are mentioned a few times, I don't see any activities to support the number of navigators. I think an activity to support training students to act as digital navigators (similar to activity 1.3.a on page 24) would be appropriate. Potentially, this could be a collaboration with ISPs who help onboard new customers (also supporting activity 1.2.b) or through high schools/libraries/UM Extension.
	I also wonder if the Minnesota Department of Health Services could also be a point of contact for informing/helping register people about the ACP program. Local staff working with citizens eligible for certain benefits (SNAP, for example) are likely to be eligible for ACP and may have some of the same documentation requirements. That would seem to be in alignment with HS' goals to make telehealth more accessible.
	Providing a "consumer reports" type guide to help users decide what devices meet their needs would be valuable for people who have never had digital device. Or providing existing resources to aid.

Is there an additional section you would like to comment on?	Yes

Which section of the plan does your comment address?	3: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	While the Digital Equity Act includes "individuals who primarily reside in a rural area" as a covered population and the rates of technology availability, adoption, and use are clearly lower in Greater Minnesota (pages 36-41), it would be interesting to see the absolute number of individuals in addition to the rates. For example, on page 38, it is noted that 66.8% of Greater Minnesota have a broadband subscription vs 91.5% in the Metro counties do. My ballpark calculations (using a state population of 5.8 million, with 55.1% in the Metro and 44.9% in Greater Minnesota) indicates that there are 271,000 individuals in the Metro area and 864,000 in Greater Minnesota who do not have broadband meaning that about 24% of individuals who lack broadband are in the Metro area.

While the need for broadband and related resources are clearly larger in Greater Minnesota, keeping both the rates of need and total need in mind is necessary.

The numbers also should be viewed through the perspective that broadband availability is more of a limiting factor in Greater Minnesota. If we had data that showed adoption rates in serviced rural & urban areas, that would be helpful in gauging how much of the equity problem is infrastructure-based vs other limitations. |
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	3: The Current State of Digital Opportunity
Comment regarding the Digital Opportunity Plan	Just a note that on page 41, this sentence, "In 2022, voter turnout among Minnesotans ages 65 and older was 83.8% compared to 56.1% of Minnesotans ages 25-24." likely contains a typo. The age group might be 25-64, not 25-24?

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Literacy Minnesota
Email	swbrandt@literacymn.org
Zipcode	55114
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	5: The Current State of Digital Opportunity

Comment regarding the Digital Opportunity Plan

Digital literacy skills and access are increasingly essential to navigate and succeed in Minnesota. The Adult Education (ABE) field is excited to help build digital literacy skills and access across Minnesota. Minnesota Adult Education (ABE) adopted the Northstar Digital Literacy Standards as one of our system's sets of content standards, acknowledging the importance of integrating digital literacy into the educational and career preparation work we do. In reviewing the plan, the Adult Education team at the Minnesota Department Of Education had some questions and comments. At Literacy Minnesota we work closely with our MDE colleagues and share their concerns.

• Adult education (ABE) is providing digital literacy instruction with our services. Yet, we do not see ABE included as a collaborative named partner in this work. For example, ABE is not mentioned in the advocates and educators section page 37-38. Minnesota has one of the strongest ABE systems in the nation, and we should be leveraging this asset to its fullest capacity.

• The draft plan notes that "CareerForce as providing in-person and virtual services, including a variety of classes to develop career seekers' digital skills" (p. 38). We would like to note that ABE is working with CareerForce to help provide basic digital skills training. Unfortunately, since CareerForce has shifted their service delivery model to include virtual delivery, this has sometimes created a barrier for some in accessing CareerForce services. That shows the need for digital skills instruction and adult education (ABE) would like to continue to be a part of that work.

• Several potential partners are not included in the plan, especially in the education sector.

o Community Education is missing as potential advocate to provide services in local communities.

o How can community colleges, located in so many communities, support this endeavor? Minnesota's postsecondary institutions should be considered as resources.

• The Minnesota Career Education Center (MCEC) provides Adult Basic Education (ABE) services at nine state prison locations. Programs have classroom computers to allow students access to online software programs. Additionally, learners have access to high-quality academic and legal research databases.

o The plan notes that the Minnesota Department of Corrections provides tablets for all incarcerated students. In partnership, MCEC ensures effective ABE content is available on these tablets to enhance distance learning and hybrid learning options. Is this accurate with ABE programs and learners at all facilities?

• With the focus on "People from Minoritized Racial and Ethnic Groups," it is important to include low literacy and those who do not read or speak English. About half Minnesota Adult Education (ABE) participants are people who are English learners. The vast majority (an estimated 80%) of Minnesota Adult Education (ABE) participants identify as: Black, African, or African American; Hispanic or Latinx; Asian; Native American or American Indian; and/or two or more races or ethnicities (utilizing federal race and ethnicity categories).

o To get real input from people who do not speak English information needs to be translated into many languages. Translators hopefully will be available at focus groups. The $4,000 provided for DCC does not cover this need statewide.
o The statewide tech help line that is proposed should be multilingual. Other states, like Washington, and entities, like World Education, have some strong plans and strategies, too. We encourage Minnesota to consult with other states and review other states' plans so we can focus on increasing both digital access and skills for all Minnesotans.

Additional comments:
Regarding a potential statewide device lending program: digital equity leaders nationwide point to device ownership as the goal, not device lending. We would encourage you to consider device ownership when exploring options for this program. Also, our experience working with device distribution is that a significant proportion of devices will need replacement or repair within 12 months of distribution. A plan must be in place for ongoing technical support and navigation to ensure that devices are maintained in working condition for recipients.

We are concerned that unless funds are intentionally designated for digital skills training and digital navigation services, that these activities will be underfunded compared to the need. In any competitive grant opportunity, we encourage OBD to reserve resources specifically for programs providing skills training and ongoing digital navigation.

Digital navigation and skills training will be more effective at reaching target populations if provided by trusted community organizations. While ISPs can be valuable partners in this work, they may not be trusted by historically underserved communities. We encourage OBD to look to community anchor organizations to take the lead in providing these services.

Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People from Minoritized Racial/Ethnic Groups
	People with Disabilities
	People with limited English speaking or reading skills
	People in Low-Income Households

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Sarah Swedburg
Email	sarah@kandiyohi.com
Zipcode	56201
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	4: Implementation
Comment regarding the Digital Opportunity Plan	We strongly support non-competitive grant opportunities for organizations in rural communities that have experience in quality broadband development projects for infrastructure and equity implementation.
Is there an additional section you would like to comment on?	No
Optional: Do you identify with any of the following covered populations?	People Living in Rural Areas

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Michelle Marotzke
Email	michelle.marotzke@mmrdc.org
Zipcode	56201
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals
Comment regarding the Digital Opportunity Plan	As the Office of Broadband (OBD) team is aware, this work is expansive, complex, and messy. I encourage the creation of non-competitive grant opportunities for organizations in rural communities by using the federal funding that will be coming to the State of Minnesota and through OBD. These grants would provide funding for organizations that work in the broadband and equity space, including infrastructure deployment and projects that advance digital opportunities for all users. These organizations may include community action partnerships, regional development organizations, cooperatives that offer internet service, and other non-profit or not-for-profit organizations. I also suggest a new goal stating that the State of Minnesota will use a variety of digital equity methods in all programs. For example, the Frontline Worker Pay program could only be used by people who had access to internet service and who understood the confusing form and subsequent emails. Through my organization, we assisted several people from three of our counties to create an email, navigate the application (creating, completing and uploading information), and following up with the subsequent email that said they were denied but really meant that they had to upload their identification. Without a telephone number to call, many people who were eligible for this program were unable to access it.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	5: Implementation

Comment regarding the Digital Opportunity Plan

I urge OBD to find ways to hold providers accountable for consumer issues. Too many providers create confusing pricing plans and make signing up for services difficult for people who are not fluent in English (written or oral), people who have disabilities, and people who do not have reliable access to internet service. There are providers who have made the signup process for the Affordable Connectivity Program (ACP) difficult, if not impossible, and some that require a user to sign up for a social media account in order to connect with the provider. The Federal ACP application is also confusing, so providing funding for digital navigators within existing organizations (such as Community Action Partnerships, county Extension offices, etc.) would help internet consumers understand their pricing and receive discounts they are entitled to.

Optional: Do you identify with any of the following covered populations?

People Living in Rural Areas

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	Anita Hollenhorst, CTC
Email	anita@goctc.com
Zipcode	56455
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	Yes
Which section of the plan does your comment address?	3: Goals

Comment regarding the Digital Opportunity Plan	- 3.1.1 (3a) - the need for a skilled and trained workforce in telecommunications cannot be understated. In order to meet some of the objectives within Goal 3, especially "All Minnnesotans have access to a trusted provider of quality technical support.", CTC recommends that there should be state and federal resources dedicated to workforce development programs and incentives within the telecommunications industry. The FCC's Telecommunications Interagency Working Group submitted recommendations to address these workforce needs to U.S. Congress in early 2023. Their recommendations provide specific and realistic areas to focus on such as recruitment, Registered Apprenticeship programs, Veteran-specific strategies, safety, and wages/benefits. We would recommend that workforce development be emphasized in Minnesota's Digital Opportunity plan. If providers have a trained and skilled workforce then it's only logical for them to assist Minnesotans with things such as cybersecurity, digital skills/literacy, technical support, device adoption and repair, and access to technology. - 3.2.1 (1) - providers should be incentivized to provide digital opportunity resources/partners. If we're providing the infrastructure and services, then it would be logical for providers to be expected to contribute to Minnesota's data and mapping tools. - 3.3.1 - CTC fully supports income-based subsidy programs like ACP. Reliable, future-proofed internet for all means that it HAS to be affordable. Knowing that the future of ACP is uncertain, we recommend exploring potential models for a statewide program. - 3.3.2 (Objective 3) - Providers should be required to have an internal cybersecurity committee that adheres to the National Institute of Standards and Technology's Cybersecurity Framework. Again, it's only logical for providers - who are responsible for the infrastructure and services - to be expected to help people feel comfortable identifying and mitigating cybersecurity issues.
Is there an additional section you would like to comment on?	Yes
Which section of the plan does your comment address?	5: Implementation

Comment regarding the Digital Opportunity Plan

- 5.1.1 (Advocates & Educators) - If providers were required to have a "digital navigator" on staff (maybe with grant support or other financial incentives?) it would be a logical connection to help further this goal. Providers already have the technological expertise and skills to help support people (newly-connected households or New Americans) so it seems logical that they could help people navigate internet access, acquiring devices, and developing digital skills.

- 5.2.2 - Fiber-to-the-premise has proven to be a more reliable form of broadband delivery. Fiber technology is a larger up-front investment but constant improvements in fiber optic technology and equipment can improve how much bandwidth is available - without having to deploy new networks. Funding for the construction, network development, and ongoing maintenance of this infrastructure is critical.

- 5.4.1 - Partnerships between providers and tribal communities should not be underestimated and could prove to be very advantageous in terms of digital opportunity. CTC has established partnerships with Bois Forte Band of Chippewa and Mille Band of Ojibwe. Not only will these partnerships help the tribes gain sovereignty of their new fiber networks but they would help advance technology availability, adoption, and use within these Native Nations.

- 5.4.3 - As a provider we've seen this firsthand. We try to be flexible in terms of how we provide tenants of multi-dwelling units with internet but the fact is that the owners of MDUs play a large role in if, how, or when the tenants receive reliable, affordable, and safe internet options.

- 5.8.2 - As a provider we contract with a third-party vendor to provide language translation services. Language barriers can be a significant obstacle and we don't want it to deter someone from receiving our services.

- 5.9.3 - As stated in Section 3 - CTC fully supports income-based subsidy programs like ACP. Reliable, future-proofed internet for all means that it HAS to be affordable. Knowing that the future of ACP is uncertain, we recommend exploring potential models for a statewide program.

Is there an additional section you would like to comment on? No

Optional: Do you identify with any of the following covered populations? People Living in Rural Areas

Digital Opportunity Plan Public Comment

Name of person or organization submitting this comment	[self-represented individual #32]
Email	[removed]
Zipcode	55407
Would you like to receive a copy of the plan via email once it is finalized? If yes, please make sure the email address provided above is correct.	No
Which section of the plan does your comment address?	Handout: Executive summary
Comment regarding the Digital Opportunity Plan	Have we considered regulating access to the internet like it's a telecom? USI has been expanding access to its services based on the ability of people to afford the access and not with any equity pieces. Or, what if we bought them out and provided it as a state service, or handed it to municipalities?
Is there an additional section you would like to comment on?	No

AMERICAN PUBLIC MEDIA GROUP
MINNESOTA PUBLIC RADIO | AMERICAN PUBLIC MEDIA | SOUTHERN CALIFORNIA PUBLIC RADIO

PREPARED FOR:	**MN Office of Broadband Development**
PREPARED BY:	**Anissa Rogness, Director of Public Affairs & Government Relations**
	Nick Kereakos, Senior Vice President, Chief Technology Officer
DATE:	**October 3, 2023**
RE:	**Public Comments on MN Draft Digital Opportunity Plan**

Minnesota Public Radio (MPR) began as a single classical music station in 1967 at KSJR in Collegeville and has grown into an acclaimed regional and national provider of news, information, and culture. Today, MPR is one of the nation's premier public radio stations serving nearly all of Minnesota and parts of surrounding states. Its three regional services - MPR News, YourClassical MPR and The Current - reach nearly 1 million listeners each week through programming for radio, digital, and live audiences (Source: Nielsen Audio, PSA and PPM data, P12+, Mon-Sun 6a-12m, Spring 2021). MPR is supported in part by its 123,280 members, one of the largest membership bases in public radio.

MPR operates a 46-station radio network and its three regional services - MPR News, YourClassical MPR and The Current - produce programming for radio, digital and live audiences. MPR uses its network to deliver vital public services throughout the state, including providing and maintaining the technical infrastructure for Minnesota's Emergency Alert System (EAS) and distributing Minnesota's AMBER Alert System to all broadcasters in the state. Our radio broadcast services are shared at no cost to the public through our statewide network of stations reaching 95% of all Minnesotans.

As a statewide convener, MPR reaches audiences who want to be informed, inspired, entertained, and energized. Our programming helps strengthen communities, fosters dialogue, and celebrates the diversity and creativity that makes Minnesota civic-minded and culturally vibrant.

Programs produced by MPR's national programming brand, American Public Media (APM), reach over 17 million listeners via approximately 1,000 public radio stations nationwide each week (Source: Nielsen Audio, Nationwide DMA data, Persons 12+, Spring '21). APM is one of the largest producers and distributors of public radio programming in the world, with a portfolio that includes BBC World Service, Marketplace, and the leading classical music programming in the nation, YourClassical. APM Studios, a division of APM, offers a diverse array of podcasts featuring the best in food, culture, entertainment, business, and journalism.

Our mission is to create the future of public media by amplifying voices to inform, include, and inspire. Through our five-year strategic plan, *Audiences First 2025*, MPR is producing content and experiences that engage diverse audiences to connect people with each other, their communities, and the world.

Nearly all of MPR's produced content is available digitally, and many content offerings are now specifically created for digital audiences, enabling more Minnesotans throughout the state (as well as people around the world) to have access to our programming. The opportunities created through online and digital content have allowed us to serve more people than ever before. MPR's web pages receive an average of 8.4 million monthly pageviews and our online audio and video content is streamed or downloaded more than 9.5 million times each month (Sources: Google Analytics, Triton, Megaphone, YouTube, Facebook, partner sources).

As MPR continues to focus on creating content that can be accessed on multiple platforms, the availability and deployment of broadband and accessibility of internet technology is very important to us. It is here that we align well with the goals of the MN Draft Digital Opportunity Plan to: (1) Connect People to People; (2) Connect People to Information; and (3) Connect People to Resources.

There are a few specific areas on which we would like to provide comments.

Emergency Alert System. As previously mentioned, MPR uses its network to deliver vital public services throughout the state, including maintaining the technical infrastructure for Minnesota's Emergency Alert System (EAS) and distributes Minnesota's AMBER Alert System to all broadcasters in the state. We urge the MN Digital Opportunity Plan to consider the need to provide emergency information to the widest number of people, to the greatest extent possible.

News Distribution. We currently reach 95% of Minnesotans through our network. We believe it's important to have local reporting resources in communities throughout Minnesota, including areas we consider to be "news deserts." Deployment of broadband infrastructure and equipment throughout Minnesota can only aid in providing these critical resources to people in communities across our state.

Digital Literacy and Training. One of the areas included in the MN Draft Digital Opportunity Plan involves technical assistance, digital literacy, and training. Our content is only valuable if Minnesotans have the digital skills to access it. We urge the MN Office of Broadband Deployment to determine the technical assistance and training needed so Minnesotans can fully utilize the resources deployed.

The MN Office of Broadband Deployment values authenticity, cooperation, and partnerships. MPR strives to connect Minnesotans through accessible journalism and authentic conversations. As we strive to provide trusted information and build community connections, we believe opportunities for synergy and cooperation exist. We hope to further develop our relationship and partnership with the State of Minnesota in successful implementation of the MN Digital Opportunity Plan.

September 28, 2023

Department of Employment and Economic Development
Office of Broadband Development
Great Northern Building
180 5th St E.
St. Paul, MN 55101

Dear Director of the Office of Broadband:

Ramsey County appreciated the opportunity to form a Digital Connection Committee as part of the Office of Broadband Development (OBD) Digital Equity Planning process and provide input about the digital needs, barriers, and assets in our jurisdiction. We value OBD as a partner in this work and look forward to working together to accomplish our shared goals.

Ramsey County has been actively engaged in the digital equity issue since it was illuminated at the start of the pandemic. We have learned that digital inclusion is the foundation of an equitable future and an inclusive economy, and that it is about the people and not only the wires. This reality became abundantly clear in 2023, after the COVID-19 pandemic shone an undeniable light on the Saint Paul and Ramsey households that lacked access to fast, reliable internet, the devices, and the digital skills needed to reach online opportunities.

Since the pandemic the county has shown significant leadership. Shortly into the pandemic, we distributed thousands of [Techpaks](#) that included hot spots for internet, connections and internet-ready devices to Ramsey County and Saint Paul households struggling to get online in the move to online school, work and more. In addition, we stood up a coordinating effort of digital equity resources for our community through our [Ramsey Connected](#) initiative. Most recently, we partnered with the city of Saint Paul on the [Connectivity Blueprint](#), which was led by a group of local leaders who helped to create a shared roadmap of progress on digital inclusion. As a group, we also created a comprehensive report rooted in community perspectives, mapped broadband availability and provided technology expertise and recommendations.

We are encouraged by the collective potential of this plan and see the associated funding as an opportunity to accelerate digital inclusion for our state. However, we have concerns.

As the plan indicates, digital barriers affect people within all of the covered populations. In fact, forty-seven pages of data are devoted to the covered populations mentioned in Appendix C of the plan. Many of these pages cite trends and predications for future numbers in the rural area. We suggest the plan reconsider the focus to include urban populations. It seems an oversight to omit the very significant number of people across the covered populations that reside in urban areas. Ramsey County is the third most diverse county in the state just after Mahnomen and Nobles County. In your report, you discuss the covered population of People from Minoritized Race/Ethnicity—37% of whom live in Ramsey County. In addition, we have significant numbers of other covered populations of

categories including people in low-income households, people experiencing language barriers and people who are incarcerated or re-entering after incarceration.

And while, digital barriers affect all of the covered populations, from conversations with residents, community partners, and front-line county staff, we regularly hear about specific barriers to digital access among people experiencing homelessness, people on probation, and renters (especially in multi-family apartment properties).

We also frequently hear about challenges enrolling in the Affordable Connectivity Program, difficulties repairing or replacing personal devices, and concerns about online safety and privacy. We note that many of these issues are identified in the draft Digital Opportunity Plan and appreciate the state's recognition of these challenges. However, we have questions about the viability of the proposed implementation plan to meet the corresponding 2028 performance measures.

In our work with community-based organizations across the metro, we also observed a need for capacity building to mature and support the digital inclusion ecosystem. The Digital Opportunity Leaders Network is an interesting idea to meet that need and to expand Digital Connection Committee model. Plans for richer baseline data, especially related to cyber security knowledge, publishing information about available digital opportunity resources, and advocating for more accessible online content is appreciated and Ramsey County supports those activities with the assumption that adequate funding is available to scale and sustain direct services.

Detailed Feedback and Questions

1. How does OBD propose to meet device goals?

Ramsey County shares OBD's belief that everyone deserves access to a device that meets their needs. This is described in the draft plan as Goal 3.3.1: "All Minnesota adults have the option to afford a large-screen device or smartphone, whichever most efficiently helps them access the applications they require."[1] We note that other states' Digital Equity Plan drafts include clear strategies for device access that will be implemented during the Digital Equity Act funding period.[2]

The strategies identified to support the goal relate to research to inform future programming, rather than activities to meet this need in the near term:[3]

    a. Research models for a statewide program similar to ACP that offers a device discount for low-income Minnesotans.
    b. Prepare a report that explores sustainable state-managed system for circulating large-screen devices as long-term loans through collaborating public programs.

These ideas, while worthy of exploration, are not tied to accomplishing this goal or the performance indicator that 95% of Minnesota households with access to a computer by 2028.[4] **The final planned**

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[1] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[2] Examples include the draft plans from Utah, Tennessee
[3] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[4] State of Minnesota: Digital Opportunity Plan DRAFT p 21

activity in both instances is "Receive report, publish report" with a goal completion date of 2026,[5] which leaves two years without any activity. If the reports on device lending or a statewide discount program are promising, would OBD support the development of such a model? Would such programming be possible to launch during the timeframe of this plan, or is that entirely out of scope? Is funding for devices implicit as an eligible activity in some of the digital navigation grants associated with Goals 1.2.a, 1.2.c and 3.3.d, presumably aligned with forthcoming Digital Capacity grants? Or does OBD assume that devices made available at a discount by some ACP providers and local refurbishers are adequate to meet the goal of 95% of Minnesota households with access to a computer? Does OBD know if the supply chain for refurbishers is sufficient to meet this need? Research into a state-led device lending program[6] implies that current resources may be inadequate.

Finally, ensuring the availability of assistive and adaptive technology would complement efforts to improve government website accessibility as well as ensure that all Minnesotans, especially the covered population of people with disabilities, have access to a device to meet their needs. Ramsey County has repeatedly heard from clients, community members, and other stakeholders about the financial difficulty to purchase a device or replace a lost, stolen or damaged one. Feedback about the ACP device discount noted the discrepancy between what is considered affordable and to whom. The latest ACS data reflects that an estimated 8,710 households lack any device, with approximately 36,801 households without a laptop or desktop device and 15,598 relying on a smartphone for all computing needs.[7] Additionally, the data gathered for the Connectivity Blueprint, indicates the BIPOC community in Ramsey County is disproportionally affected, with only 49 percent reporting that they had the tech and internet access needed to participate in online life. As these are household estimates, we do not have an accurate count of the number of individuals who lack access to an adequate personal device.

2. **Connecting people to digital navigators and resources is critical. Adequate funding is needed.**

The draft plan notes the value of digital navigation work and the broader digital opportunity ecosystem in Minnesota.[8] The plan then notes: "**One-on-one technology assistance through community-based organizations is becoming more common, but funding is piecemeal overall.** Non-profit organizations are particularly vulnerable. Grants may be available to pilot a new digital opportunity program or service, but sustaining these services is a persistent puzzle."[9]

We appreciate the desire to support digital inclusion practitioners through capacity building and connections, outlined in Goal 1.[10] However, many organizations -- including ours -- need funding to sustain basic operations or maintain a fledging digital navigation program. As the state correctly notes,

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[5] State of Minnesota: Digital Opportunity Plan DRAFT p 21
[6] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[7] ACS 1-Year Estimates, 2022 accessed at S2801: Types of Computers and … - Census Bureau Table
[8] State of Minnesota: Digital Opportunity Plan DRAFT p 32
[9] State of Minnesota: Digital Opportunity Plan DRAFT p 34
[10] State of Minnesota: Digital Opportunity Plan DRAFT p 16

sustainable funding is a puzzle. But we urge capacity grant funding for digital navigators as a launching point.

Ramsey County urges OBD to allocate adequate funding to this area that is proportionate to the needs and sufficient to meet the key performance indicators stated in the plan. There are no funding targets associated with supporting digital navigation programs, which the county understands may be premature and could be dictated by a future NOFO from NTIA. Nonetheless, it is our assumption that the eligible activities and entities for Digital Equity Capacity grants are outlined in this draft plan, and so we are alarmed by the lack of specificity here.

We note and appreciate the following changes in the presentation of the plan based on initial feedback:
- 1.2 a and c Pilot <u>and/or expand</u> digital navigator services are eligible purposes for grants[11]
- 3.3d <u>Townships, cities, counties, tribes, and</u> orgs serving covered eligible for competitive grants[12]

We appreciate the clarity that expanding current programs is an eligible purpose, and that local government entities (and organizations serving covered populations) can apply for competitive grants. However, we remain uncertain about how "organizations serving covered populations" will be defined. This is a notable contrast to the specificity used elsewhere to identify eligible entities.

For example, in 1.2c the draft plan recommends to "Provide all CAP agencies, Centers for Independent Living, regional public library systems, veteran homes, and area agencies on aging a non-competitive funding opportunity to pilot digital navigator positions that support clients with digital access and skills needs."[13] Support for these organizations aligns with this goal, which we support with the understanding that funding can pilot or expand programming. Other community anchor institutions, such as health care providers, schools, and community colleges are not listed, and many of those organizations have existing digital navigation and/or training programs. For health care providers the connection to telehealth is a "valuable but underutilized resource"[14] and makes this omission particularly confusing.

We assume that other types of community anchors, as well as community-based organizations, would be eligible for digital navigation funding as "organizations serving covered populations," however we did not find a clear definition of this term. It is described slightly differently in two different sections:
- 1.2a "Administer grants designed to support digital navigation services, targeting rural cities, rural counties, and <u>organizations that both represent and serve covered populations</u>"**[15]**

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[11] Added "and/or expand" to eligible purposes, highlighted in slide 27 from 230914 virtual ppt, contrasted with State of Minnesota: Digital Opportunity Plan DRAFT p 16, 22
[12] Additional named entities outlined in slide 27 from 230914 virtual ppt, contrasted with State of Minnesota: Digital Opportunity Plan DRAFT p 20, 27
[13] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[14] State of Minnesota: Digital Opportunity Plan DRAFT p 34
[15] State of Minnesota: Digital Opportunity Plan DRAFT p 16

- 3.3d "Administer competitive grant funding to <u>organizations serving covered populations that are conducting digital opportunity work</u>."[16]

Ramsey County reiterates the need for adequate resources be allocated to these competitive grant categories to meet the breadth and depth of community needs statewide and realize OBD's stated objective to develop a "holistic, comprehensive, and accessible social infrastructure aimed at *reducing* a person's digital precarity."[17] Absent sufficient funding, current digital opportunity programming may not be viable.

We reiterate our original recommendation that all counties receive block grants proportionate to their covered populations or the number of households experiencing digital barriers based on ACS estimates.

3. Prioritize online safety for all Minnesotans.

Ramsey County shares the state's belief that all residents should have access to trusted providers of digital skills training, including cyber security training, as stated in goal 2, "All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity."[18] However, the strategy to meet this goal is puzzling: "Collaborate with internet service providers who are receiving state and federal infrastructure funds to ensure newly connected households understand the basics of cybersecurity."[19]

Feedback we have received about online safety and cyber security highlight its importance for all residents not just the newly connected, as well as the value of trusted messengers in helping people change behaviors.

Although Ramsey County values what internet service providers can accomplish as partners and broadband providers, they are not always suited to be the primary advocates and educators on online safety, especially for people with limited English proficiency. Residents frequently complain about ISPs' service quality, upselling, and customer service. In addition to what we have heard, the draft plan notes that people of color are more likely to rely on a cellular data plan and experience service interruptions because they were "unable to get the technical support they needed from providers. This is likely due to language barriers, cultural barriers, and racial aggressions."[20]

State and local government, schools, libraries, and community-based organizations are more trusted than internet service providers. We urge the state not to overly rely on internet service providers to ensure all residents understand how to keep themselves and their data protected. At the very least,

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[16] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[17] State of Minnesota: Digital Opportunity Plan DRAFT p 19
[18] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[19] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[20] State of Minnesota: Digital Opportunity Plan DRAFT p 49

the goal of keeping Minnesotans safe online should be carried out by more than one group of stakeholders.

The plan may assume that the entities receiving grant funding for digital navigation will provide this training as well and outline those expectations in a forthcoming RFP or technical assistance plan. We have noted gaps in available digital skill and safe online practice training materials for English language learners. That could be an area for statewide collaboration and information sharing.

Finally, the proposed goal for 95% of people from covered populations comfortable identifying and mitigating cybersecurity issues[21] seems unrealistic without any identified baseline metrics. It may be intended to be a 95% increase in covered populations who feel proficient.

4. All Minnesotans should have access to a trusted provider of quality technical support.

Ramsey County supports OBD's goal 1.3 that "All Minnesotans have access to a trusted provider of quality technical support."[22] For residents seeking support or repair for their home internet connection, personal device, or other technical issue there are limited options.
The underlying strategies, however, may not address the needs of most residents in the near term:
>   a. Develop curriculum and administer grants designed to support high schools, after-school programs, and 2-year public and tribal colleges in hiring and training students to work part-time as paid tech repair technicians.
>   b. Administer grants to small businesses to assess their technology needs and improve their technology access. [23]

The proposal to explore a statewide help line, outlined in strategy 1.2d, better aligns here and could be a plausible strategy to meet this need. [24] However, the final outcome is to a receive a report.[25] We would support working to implement this idea if feasible, especially if interpretation could be provided for residents who are not proficient in English.

Proposal 1.3b: *Administer grants to small businesses to assess their technology needs and improve their technology access[26]*, is interesting and Ramsey County is aware of the technology challenges facing small businesses. We note that this idea would not make technical support available to all residents and may exclude the nonprofits and religious organizations that are often in need of technology assistance. According to the Minnesota Council of Nonprofits, in 2021 nonprofit organizations employed 14% of the state's workforce.[27]

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[21] State of Minnesota: Digital Opportunity Plan DRAFT p 21
[22] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[23] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[24] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[25] State of Minnesota: Digital Opportunity Plan DRAFT p 24
[26] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[27] 2020 - 2021 MINNESOTA NONPROFIT ECONOMY REPORT p 4 accessed at 2020-21-minnesota-nonprofit-economy-report.pdf (minnesotanonprofits.org)

Plans to develop and implement technical training programs in high schools are a starting point and an exciting idea but offer no immediate support to Minnesotans lacking technical support.

5. Recognize the digital divide impacting apartment and other multi-dwelling units with action.

Ramsey County appreciates the acknowledgement of a unique digital divide impacting residents of apartments and mobile home parks.[28] The proposed partnership with Education SuperHighway and local housing partners is a promising start and we support this collaboration.[29]

However, there is no work identified other than convening a working group to meet quarterly[30] and there are no associated key performance indicators to measure progress. Is OBD's assumption that projects related to internet access for this housing stock can be funded through another source? We urge OBD to underwrite this goal by making its BEAD funding available for this crucial program.

It is unclear whether the digital opportunity goals for broadband adoption and access set forth in this plan can be accomplished without addressing the connectivity gaps that persist in multi-family housing. OBD notes that people of color are far more likely to be impacted by these issues than white Minnesotans:

> People from minoritized racial and ethnic groups are more likely to be renters than White people. In Minnesota, 19.5% of White Minnesotans are renters. This rate increases to 69.5% for Black Minnesotans, 50.9% of Indigenous Minnesotans, 34.6% of Asian Minnesotans, 62.4% of Minnesotans of an unspecified minoritized race, 41.8% of multi-racial and multi-ethnic Minnesotans, and 50.8% of Hispanic or Latino Minnesotans. [31]

If digital opportunity cannot be extended to residents of multifamily apartments, and those same people are more likely to belong minoritized racial and ethnic groups, can we achieve digital equity absent meaningful solutions to this problem?

There are policy changes that could be recommended to accomplish the goal of interest for all. We recognize that OBD believes policy changes are outside of their bailiwick[32] and thus are not detailing recommendations here. However, **digital opportunity exists within the context of deliberate, historical under-investment in communities of color. We urge OBD to recognize that current policies may reinforce rather than dismantle this digital divide.**

6. Balance research and planning with implementation.

Ramsey County appreciates the desire to meaningfully plan and capture data to inform future decisions. However, the draft plan is very heavy on research, reports, establishing workgroups, and creating local plans. All of these are valuable efforts; however, they appear to have a disproportionate

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[28] State of Minnesota: Digital Opportunity Plan DRAFT p 74
[29] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[30] State of Minnesota: Digital Opportunity Plan DRAFT p 26
[31] State of Minnesota: Digital Opportunity Plan DRAFT p 52-53, 74-75
[32] State of Minnesota: Digital Opportunity Plan DRAFT p 8

focus at the expense of implementing current or future plans, or outcomes that may be driven by proposed working groups.

To the extent that the draft Plan is a guide to future funding provided to OBD via NTIA's capacity grant program, we are concerned about a lack of clear recommendations for the specific, proven activities noted above. If, for example, we share a belief that digital navigation, device provision and online-safety training make demonstrable improvements in our community's digital ecosystem, then we hope that they would be funded via capacity grants, and specifically noted in the Plan.

OBD will commission four studies, in addition to expanding the available digital opportunity data:

- **Prepare a report** that explores models for a statewide technology assistance helpline.[33]
- **Prepare a report** that explores potential models for a statewide program similar to ACP and Lifeline to reduce internet costs for low-income Minnesota households.[34]
- **Research models** for a statewide program similar to ACP that offers a device discount for low-income Minnesotans.[35]
- **Prepare a report** that explores sustainable state-managed system for circulating large-screen devices as long-term loans through collaborating public programs.[36]

OBD proposes four new working groups, in addition to the Digital Opportunity Leaders Network and Digital Connection Committee structure, with quarterly meetings as the only proposed output:

- Convene an inter-agency digital opportunity workgroup with appointed membership from state agencies representing key partners and covered populations[37]
- Collaborate with MN Housing, Education Superhighway, North Country Service Cooperative, and other housing partners[38]
- Collaborate with MN Department of Corrections and the MN Career Education Center[39]
- Collaborate with DEED's Office of New Americans[40]

The outcome in each of these instances is the creation of a report or a final meeting. Many of these proposed collaborations, research efforts, and partnerships appear relevant. However, the lack of meaningful goals or objectives is worrisome.

There is a risk that all these outcomes are met without meaningful improvement in the stated digital opportunity key performance indicators that relate to residents' access to devices, high speed home internet, and digital literacy and skills. Instead of reports, we encourage the state to focus on funding implementation and the creation of measurable corresponding actions.

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[33] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[34] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[35] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[36] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[37] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[38] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[39] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[40] State of Minnesota: Digital Opportunity Plan DRAFT p 20

We ask for creative thinking beyond the identified highlighted strategies for grant distribution, that focuses greatly on noncompetitive, formula funded models. Rather we would encourage competitive models that allow local areas to achieve state designated goals and outcomes with local opportunities administered by counties and other locally driven entities such as Workforce Development Boards, etc. In addition, it is important to recognize the balance between rural and urban needs. Other DEED workforce funding models have leveraged 60/40% splits to ensure funding flows both to greater Minnesota while recognizing the unique needs of Twin Cities metro area (though urban needs around digital equity are not only prevalent in the Twin Cities metro).
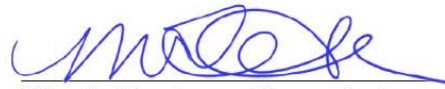
In closing, while digital equity refers to the current state of unequal resource distribution, digital inclusion is the end goal. We would like to see a state in which everyone has the necessary technology to fully participate in all parts of our society. It's the foundation of a fair future and an inclusive economy both in the rural areas of Minnesota but also in urban communities. Ensuring digital inclusion with these one-time capacity building resources can assure that everyone has equal access to jobs, learning opportunities, essential services and vital communication that bonds communities. We have learned throughout the past few years that digital skills, affordability and access to technology are critical to achieving digital inclusion.

Thank you for your work to propel Minnesota to a be a state where all residents have an opportunity to thrive.
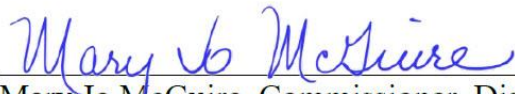
Ramsey County Board of Commissioners

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Rena Moran, Commissioner, District 4

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Mai Chong Xiong, Commissioner, District 6

_____
Ryan T. O'Connor, County Manager

Memo

To: Hannah Buckland, Digital Equity Program Lead, Minnesota Office of Broadband Development

Bree Maki, Executive Director, Minnesota Office of Broadband Development

From: Philip Essington, Director of Broadband and Digital Inclusion, Hennepin County

Ryan Jelinek, Medical Director of Telemedicine and Access; Hospitalist - Dept. of Medicine, Hennepin Healthcare

Date: September 28, 2023

Re: Digital Opportunity in Hennepin County and the Twin Cities Metro Area:

Written feedback to the Draft Minnesota Digital Opportunity Plan

Hennepin County, and our fellow co-signers, appreciate the opportunity to form Digital Connection Committees as part of the Office of Broadband Development (OBD) Digital Equity Planning process and provide input about the digital needs, barriers, and assets in our jurisdiction. We value OBD as a partner in this work and look forward to working together to accomplish our shared goals.

As our residents include urban, suburban, and rural communities, we are familiar with the nuances of broadband adoption and digital inclusion work in all three domains.

We appreciate state's vision for the future where "**digital equity connects all Minnesota residents to opportunities, options, and each other**" as well as the three overarching goals[1] and many of the proposed key performance indicators. It demonstrates an understanding of the available data, tools, and metrics. As a data-informed organizations, we welcome specific targets in this field and believe they are ambitious but achievable.

We also note the change in language from a Digital Equity to Digital Opportunity, based on feedback that the term "digital equity" did not resonate with community. That modification aligns with the

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[1] State of Minnesota: Digital Opportunity Plan DRAFT p 6

Hennepin County Office of Broadband and Digital Inclusion
300 South Sixth Street, Minneapolis, MN 55487
612-348-3000 | hennepin.us/tech

county's value to prioritize our residents and use plain language. However, we urge the state to not lose sight of the word <u>equity</u> and the structural inequalities that led to the digital divide. In a state like Minnesota with significant racial disparities that are interrelated, we encourage OBD to remain committed to the goal of digital equity for all. All of Minnesota is **"thousands of places and millions of people each of whom deserve the option to bring technology into their daily lives"**[2] and dominant narratives about rural, suburban, and urban communities can obscure more nuanced realities about the digital divide that deserve attention.

We appreciate that OBD has been directed by the federal government to target its programs toward "covered populations," people who, due to systemic challenges, may face disproportionately low rates of digital inclusion. We are working to correct those systemic challenges as well, especially in light of the scale of this population: In Hennepin County, based on the best available data, the Census estimates that 780,000 residents (61.6%) are defined as a covered population for the Digital Equity Act.[3] There are 131,879 households below the federal poverty level[4] and 193,480 households below 150% of the federal poverty guidelines.[5] More than one third of our residents, or approximately 416,000 people, self-identity as members of members of a minoritized racial or ethnic group.[6] We also note that approximately 18% or an estimated 97,000 households lack a wired broadband subscription,[7] many more households struggle with home internet costs and could be termed "subscription vulnerable"[8] and 63,366 households are estimated to lack access to laptop or desktop.[9]

Digital barriers affect all the covered populations; however, people with lower incomes, people of color, people with limited English proficiency or low literacy skills, and seniors are all less likely to have a broadband subscription or a computer. From conversations with residents, community partners, and front-line county staff, we regularly hear about specific barriers to digital access among people experiencing homelessness, people on probation, and renters (especially in multi-family apartment properties).

We also frequently hear about challenges enrolling in the Affordable Connectivity Program especially for immigrants and refugees, difficulties repairing or replacing personal devices, and concerns about online safety and privacy. We note that many of these issues are identified in the draft Digital Opportunity Plan and appreciate the state's recognition of these challenges. However, we have questions about the viability of the proposed implementation plan to meet the corresponding 2028 performance measures.

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[2] State of Minnesota: Digital Opportunity Plan DRAFT p 41
[3] [Digital Equity Act Population Viewer (census.gov)](#)
[4] ACS 1-Year Estimates, 2022 accessed at [S1701: Poverty Status in the Past ... - Census Bureau Table](#)
[5] ACS 1-Year Estimates, 2022 accessed at [C17002: Ratio of Income to Poverty ... - Census Bureau Table](#)
[6] ACS 1-Year Estimates, 2022 accessed at
https://data.census.gov/table?q=B02001&g=050XX00US27053&y=2022&tid=ACSDT1Y2022.B02001
[7] ACS 1-Year Estimates, 2022 accessed at [S2801: Types of Computers and ... - Census Bureau Table](#) defined as "Broadband such as cable, fiber optic or DSL" and most closely aligns with the state broadband definition.
[8] People who "find the internet very difficult to fit their monthly service fee into their budgets and live at or near the poverty line." Term introduced by John Horrigan in the Affordability and the Digital Divide report available at [2022 National Research — EveryoneOn](#).
[9] ACS 1-Year Estimates, 2022 accessed at [S2801: Types of Computers and ... - Census Bureau Table](#)

In our work with community-based organizations across the metro, we also observed a need for capacity building to mature and support the digital inclusion ecosystem. The Digital Opportunity Leaders Network is an interesting idea to meet that need and to expand the Digital Connection Committee model. Plans for richer baseline data, especially related to cyber security knowledge, publishing information about available digital opportunity resources, and advocating for more accessible online content is appreciated and we support those activities with the assumption that adequate funding is available to scale and sustain direct services.

Finally, we all reiterate our concerns about digital equity issues that can only be addressed through policy changes. We appreciate an acknowledgement about systematic policy issues[10] that may be outside the scope of this plan. Nonetheless, we believe, and think there is agreement, that without policy changes, the ultimate goal of shared digital opportunity will remain out of reach.

> "This plan exists in the middle of a particular kind of tension between what is permissible and what is needed. The gaps in digital opportunity that many individuals confront daily are often a consequence of long-term gaps in federal, state, and local policy that have allowed people to be left behind. **For gaps to be closed in the long-term, new federal, state, and local policies need to be in place. Without addressing the inequities built into this system, the same gaps will remerge and persist.** It is, however, outside of the purview of OBD to independently recommend policy changes, serve as a regulatory body, or propose regulatory reform."[11]

Our organizations have some specific comments about the draft plan, and they are outlined below.

Detailed Feedback and Questions

1. How does OBD propose to meet device goals?

Hennepin County and our partners share OBD's belief that everyone deserves access to a device that meets their needs. This is described in the draft plan as Goal 3.2: "All Minnesota adults have the option to have afford a large-screen device or smartphone, whichever most efficiently helps them access the applications they require."[12] We note that other states' draft Digital Equity Plans include clear strategies and for device access that will be implemented during the Digital Equity Act funding period.[13]

The strategies identified to support the goal relate to research to inform future programming, rather than activities to meet this need in the near term:[14]

> a. Research models for a statewide program similar to ACP that offers a device discount for low-income Minnesotans.
> b. Prepare a report that explores sustainable state-managed system for circulating large-screen devices as long-term loans through collaborating public programs.

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[10] State of Minnesota: Digital Opportunity Plan DRAFT p 76
[11] State of Minnesota: Digital Opportunity Plan DRAFT p 8
[12] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[13] Examples include the draft plans from Utah, Tennessee
[14] State of Minnesota: Digital Opportunity Plan DRAFT p 20

These ideas, while worthy of exploration, are not tied to accomplishing this goal or the performance indicator that 95% of Minnesota households with access to a computer by 2028.[15] **The final planned activity in both instances is "Receive report, publish report" with a goal completion date of 2026,[16] which leaves two years without any activity.** If the reports on device lending or a statewide discount program are promising, would OBD support the development of such a model? Would such programming be possible to launch during the timeframe of this plan, or is that entirely out of scope?

Is funding for devices implicit as an eligible activity in some of the digital navigation grants associated with Goals 1.2.a, 1.2.c and 3.3.d, presumably aligned with forthcoming Digital Capacity grants? Or does OBD assume that devices made available at a discount by some ACP providers and local refurbishers are adequate to meet the goal of 95% of Minnesota households with access to a computer? Does OBD know if the supply chain for refurbishers is sufficient to meet this need? Research into a state-led device lending program[17] implies that current resources may be inadequate.

Finally, ensuring the availability of assistive and adaptive technology would complement efforts to improve government website accessibility as well as ensure that all Minnesotans, especially the covered population of people with disabilities, have access to a device to meet their needs. We note the existence of current programs to provide or lend assistive technology,[18] but are unsure whether those services are sufficient.

Hennepin County has repeatedly heard from clients, community members, and other stakeholders about the financial difficulty to purchase a device or replace a lost, stolen or damaged one. Feedback about the ACP device discount noted the discrepancy between what is considered affordable and to whom. For these reasons, both organizations have invested significant CARES and ARPA dollars into devices for residents as well as to supplement what is available through the schools for students.

Although Hennepin has distributed nearly 11,000 devices since 2020, we continue to see a growth in referrals for our services and an ongoing need for computers. The latest ACS data reflects that an estimated 17,000 households lack any device, with approximately 63,366 households without a laptop or desktop device and 28,000 relying on a smartphone for all computing needs.[19] As these are household estimates, we do not have an accurate count of the number of individuals who lack access to an adequate personal device.

Recommendations:

- We urge OBD to implement a model for funding device distribution.
- We encourage OBD to clarify whether entities receiving capacity grant funding are encouraged to provide devices as part of the digital navigation service.

2. Connecting people to digital navigators and resources is critical. Adequate funding is needed.

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[15] State of Minnesota: Digital Opportunity Plan DRAFT p 21
[16] State of Minnesota: Digital Opportunity Plan DRAFT p 21
[17] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[18] State of Minnesota: Digital Opportunity Plan DRAFT p 43, 55, 58
[19] ACS 1-Year Estimates, 2022 accessed at S2801: Types of Computers and ... - Census Bureau Table

The draft plan notes the value of digital navigation work and the broader digital opportunity ecosystem in Minnesota.[20] The plan then notes: "**One-on-one technology assistance through community-based organizations is becoming more common, but funding is piecemeal overall.** Non-profit organizations are particularly vulnerable. Grants may be available to pilot a new digital opportunity program or service, but sustaining these services is a persistent puzzle."[21]

We appreciate the desire to support digital inclusion practitioners through capacity building and connections, outlined in Goal 1.[22] However, many organizations – including ours – need funding to sustain basic operations or maintain a fledging digital navigation program. As the state correctly notes, sustainable funding is a puzzle. We urge capacity grant funding for digital navigators as a launching point.

Our organizations urge OBD to allocate adequate funding to this area that is proportionate to the needs and sufficient to meet the key performance indicators stated in the plan. There are no funding targets associated with supporting digital navigation programs, which the county understands may be premature and could be dictated by a future NOFO from NTIA. Nonetheless, it is our assumption that the eligible activities and entities for Digital Equity Capacity grants are outlined in this draft plan, and so we are alarmed by the lack of specificity here.

We note and appreciate the following changes in the presentation of the plan based on initial feedback:
- 1.2 a and c Pilot <u>and/or expand</u> digital navigator services are eligible purposes for grants[23]
- 3.3d <u>Townships, cities, counties, tribes, and</u> orgs serving covered eligible for competitive grants[24]

We appreciate the clarity that expanding current programs is an eligible purpose, and that local government entities (and organizations serving covered populations) can apply for competitive grants. However, we remain uncertain about how "organizations serving covered populations" will be defined.

This is a notable contrast to the specificity used elsewhere to identify eligible entities. For example, in 1.2c the draft plan recommends to "Provide all CAP agencies, Centers for Independent Living, regional public library systems, veteran homes, and area agencies on aging a non-competitive funding opportunity to pilot digital navigator positions that support clients with digital access and skills needs."[25] Support for these organizations aligns with this goal, which we support with the understanding that funding can pilot or expand programming.

However, other community anchor institutions, such as health care providers, schools, and community colleges are not listed, and many of those organizations have existing digital navigation and/or training programs. For health care providers the connection to telehealth a "valuable but underutilized resource"[26] makes this omission particularly confusing. Broadband and digital access have been

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[20] State of Minnesota: Digital Opportunity Plan DRAFT p 32
[21] State of Minnesota: Digital Opportunity Plan DRAFT p 34
[22] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[23] Added "and/or expand" to eligible purposes, highlighted in slide 27 from 230914 virtual ppt, contrasted with State of Minnesota: Digital Opportunity Plan DRAFT p 16, 22
[24] Additional named entities outlined in slide 27 from 230914 virtual ppt, contrasted with State of Minnesota: Digital Opportunity Plan DRAFT p 20, 27
[25] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[26] State of Minnesota: Digital Opportunity Plan DRAFT p 34

proposed as a social determinant of health,[27] potentially even a "superdeterminant" of health, with multiple studies "showing a significant correlation between increasing broadband access and improved health outcomes."[28] We also note the important role that health care providers, including Federally Qualified Health Centers,[29] and safety net hospitals play in serving covered populations.

We assume that other types of community anchors, as well as community-based organizations, would be eligible for digital navigation funding as "organizations serving covered populations," however we did not find a clear definition of this term. Is described slightly different in two different sections:

- 1.2a "Administer grants designed to support digital navigation services, targeting rural cities, rural counties, and organizations that both represent and serve covered populations"[30]
- 3.3d "Administer competitive grant funding to organizations serving covered populations that are conducting digital opportunity work."[31]

We reiterate the need for adequate resources be allocated to these competitive grant categories to meet the breadth and depth of community needs statewide and realize OBD's stated objective to develop a "holistic, comprehensive, and accessible social infrastructure aimed at *reducing* a person's digital precarity."[32] Absent sufficient funding, current digital opportunity programming may not be viable.

Recommendations:

- We reiterate our original recommendation that all counties receive block grants proportionate to their covered populations or the number of households experiencing digital barriers based on ACS estimates.
- We urge OBD to allocate funding for digital navigation services proportionate to the need and sufficient to meet the key performance indicators stated in the plan.
- We encourage OBD to clarify the definition for "organizations serving covered populations" and explicitly scope in community anchor instructions.
- We urge OBD to include components of a future capacity grant NOFO that align with work that we have piloted at Hennepin County and Hennepin Healthcare and in similar programs operated in the state.

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[27] Benda, Natalie C et al. "Broadband Internet Access Is a Social Determinant of Health!." American journal of public health vol. 110,8 (2020): 1123-1125. doi:10.2105/AJPH.2020.305784 accessed at Broadband Internet Access Is a Social Determinant of Health! - PMC (nih.gov)

[28] Summary of the FCC's Connect2HealthFCC Task Force's (C2H Task Force) *Advancing Broadband Connectivity as a Social Determinant of Health Initiative* accessed at Studies and Data Analytics on Broadband and Health | Federal Communications Commission (fcc.gov).

[29] What is a Health Center? | Bureau of Primary Health Care (hrsa.gov)

[30] State of Minnesota: Digital Opportunity Plan DRAFT p 16

[31] State of Minnesota: Digital Opportunity Plan DRAFT p 20

[32] State of Minnesota: Digital Opportunity Plan DRAFT p 19

3. Prioritize online safety for all Minnesotans.

Our organizations share the state's belief that all residents should have access to trusted providers of digital skills training, including cyber security training, as stated in goal 2, "All Minnesotans have access to a trusted provider of digital skills training, including training that addresses cybersecurity."[33]

However, the strategy to meet this goal is puzzling: "Collaborate with internet service providers who are receiving state and federal infrastructure funds to ensure newly connected households understand the basics of cybersecurity."[34]

Feedback we have received about online safety and cyber security highlight its importance for all residents not just the newly connected, as well as the value of trusted messengers in helping people change behaviors.

Although our organizations value what internet service providers can accomplish as partners and broadband providers, they are not always suited to be the primary advocates and educators on online safety, especially for people with limited English proficiency. Residents frequently complain about ISPs' service quality, upselling, and customer service. In addition to what we have heard, the draft plan notes that people of color are more likely to rely on a cellular data plan and experience service interruptions because they were "unable to get the technical support they needed from providers. This is likely due to language barriers, cultural barriers, and racial aggressions."[35]

State and local government, schools, libraries, and community-based organizations are more trusted than internet service providers. We urge the state not to overly rely on internet service providers to ensure all residents understand how to keep themselves and their data protected. At the very least, the goal of keeping Minnesotans safe online should be carried out by more than one group of stakeholders.

The plan may assume that the entities receiving grant funding for digital navigation will provide this training as well and outline those expectations in a forthcoming RFP or technical assistance plan. We have noted gaps in available training materials for English language learners develop digital skills and safe practices online. That could be an area for statewide collaboration and information sharing.

Finally, the proposed goal for 95% of people from covered populations comfortable identifying and mitigating cybersecurity issues[36] seems unrealistic without any identified baseline metrics. It may be intended to be a 95% increase in covered populations who feel proficient.

Recommendations:

- We encourage OBD to explicitly include online safety training as part of the expectation for entities providing digital navigation services.
- We recommend that training materials and best practices for cybersecurity and online safety are shared amongst Digital Connection Committees and that the funding be made available for

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[33] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[34] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[35] State of Minnesota: Digital Opportunity Plan DRAFT p 49
[36] State of Minnesota: Digital Opportunity Plan DRAFT p 21

translation and interpretation to ensure this information is accessible to all Minnesotans, including people with low literacy and/or limited English proficiency.

- We encourage OBD to review the key performance indicators for this goal.

4. **All Minnesotans should have access to a trusted provider of quality technical support.**

Our organizations support OBD's goal 1.3 that "All Minnesotans have access to a trusted provider of quality technical support."[37] For residents seeking support or repair for their home internet connection, personal device, or other technical issue there are limited options.

The underlying strategies, however, may not address the needs of most residents in the near term:

a. Develop curriculum and administer grants designed to support high schools, after-school programs, and 2-year public and tribal colleges in hiring and training students to work part-time as paid tech repair technicians.
b. Administer grants to small businesses to assess their technology needs and improve their technology access. [38]

The proposal to explore a statewide help line, outlined in strategy 1.2d, better aligns here and could be a plausible strategy to meet this need. [39] However, the final outcome is to a receive a report.[40] We would support working to implement this idea if feasible, especially if interpretation could be provided for residents who are not proficient in English.

Proposal 1.3b: *Administer grants to small businesses to assess their technology needs and improve their technology access[41]*, is interesting and Hennepin is aware of the technology challenges facing small businesses. We note that this idea would not make technical support available to all residents and may exclude the nonprofits and religious organizations that are often in need of technology assistance. According to the Minnesota Council of Nonprofits, in 2021 nonprofit organizations employed 14% of the state's workforce.[42]

Plans to develop and implement technical training programs in high schools are a starting point and an exciting idea but offer no immediate support to Minnesotans lacking technical support.

Recommendations:

- We encourage OBD to implement a statewide help line with interpreter services available if the research into this idea demonstrates its viability.
- We encourage OBD to clarify whether nonprofit organizations are eligible for technology grants.

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[37] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[38] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[39] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[40] State of Minnesota: Digital Opportunity Plan DRAFT p 24
[41] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[42] 2020 - 2021 MINNESOTA NONPROFIT ECONOMY REPORT p 4 accessed at 2020-21-minnesota-nonprofit-economy-report.pdf (minnesotanonprofits.org)

5. Recognize the digital divide impacting apartment and other multi-dwelling units with action.

Our organizations appreciate the acknowledgement of a unique digital divide impacting residents of apartments and mobile home parks.[43] 38% of Hennepin County households are renters, totaling an estimated 200,000 households.[44]

The proposed partnership with Education SuperHighway and local housing partners is a promising start and we support this collaboration.[45] The BEAD plan also references this collaboration: "OBD brought together ESH, Hennepin County's Office of Broadband and Digital Inclusion and the University of Minnesota's Urban Research and Outreach-Engagement Center to work towards addressing broadband availability in MDUs under ESH's Free Apartment Wi-Fi program."[46]

However, there is no work identified other than convening a working group to meet quarterly[47] and there are no associated key performance indicators to measure progress. Is OBD's assumption that projects related to internet access for this housing stock can be funded through another source? **We urge OBD to underwrite this goal by making its BEAD funding available for this crucial program.**

It is unclear whether the digital opportunity goals for broadband adoption and access set forth in this plan can be accomplished without addressing the connectivity gaps that persist in multi-family housing. OBD notes that people of color are far more likely to be impacted by these issues than white Minnesotans:

> People from minoritized racial and ethnic groups are more likely to be renters than White people. In Minnesota, 19.5% of White Minnesotans are renters. This rate increases to 69.5% for Black Minnesotans, 50.9% of Indigenous Minnesotans, 34.6% of Asian Minnesotans, 62.4% of Minnesotans of an unspecified minoritized race, 41.8% of multi-racial and multi-ethnic Minnesotans, and 50.8% of Hispanic or Latino Minnesotans.[48]

If digital opportunity cannot be extended to residents of multifamily apartments, and those same people are more likely to belong minoritized racial and ethnic groups, can we achieve digital equity absent meaningful solutions to this problem?

There are policy changes that could be recommended to accomplish the goal of interest for all. We recognize that OBD believes policy changes are outside of their bailiwick[49] and thus are not detailing recommendations here. However, **digital opportunity exists within the context of deliberate, historical under-investment in communities of color. We urge OBD to recognize that current policies may reinforce rather than dismantle this digital divide.**

Recommendations:

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[43] State of Minnesota: Digital Opportunity Plan DRAFT p 74
[44] ACS 1-Year Estimates, 2022 accessed at [DP04: Selected Housing Characteristics - Census Bureau Table](#)
[45] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[46] BEAD Five-Year Action Plan p 11
[47] State of Minnesota: Digital Opportunity Plan DRAFT p 26
[48] State of Minnesota: Digital Opportunity Plan DRAFT p 52-53, 74-75
[49] State of Minnesota: Digital Opportunity Plan DRAFT p 8

- We urge OBD to allocate a portion of its BEAD dollars to address the digital divide in multi-family apartments and mobile home parks in order to meet their digital equity goals.
- We encourage OBD to incorporate findings from ARPA-funded pilot apartment Wi-Fi projects and ACP outreach efforts into policy recommendations to extend affordable, reliable internet access and digital opportunity to all Minnesotans.

6. Balance research and planning with implementation.

Our organizations appreciate the desire to meaningfully plan and capture data to inform future decisions. However, the draft plan is very heavy on research, reports, establishing workgroups, and creating local plans. All of these are valuable efforts; however, they appear to have a disproportionate focus at the expense of implementing current or future plans, or outcomes that may be driven by proposed working groups.

To the extent that the draft Plan is a guide to future funding provided to OBD via NTIA's capacity grant program, we are concerned about a lack of clear recommendations for the specific, proven activities noted above. If, for example, we share a belief that digital navigation, device provision and online-safety training make demonstrable improvements in our community's digital ecosystem, then we hope that they would be funded via capacity grants, and specifically noted in the Plan.

OBD will commission four studies, in addition to expanding the available digital opportunity data:

- **Prepare a report** that explores models for a statewide technology assistance helpline.[50]
- **Prepare a report** that explores potential models for a statewide program similar to ACP and Lifeline to reduce internet costs for low-income Minnesota households.[51]
- **Research models** for a statewide program similar to ACP that offers a device discount for low-income Minnesotans.[52]
- **Prepare a report** that explores sustainable state-managed system for circulating large-screen devices as long-term loans through collaborating public programs.[53]

OBD proposes four new working groups, in addition to the Digital Opportunity Leaders Network and Digital Connection Committee structure, with quarterly meetings as the only proposed output:

- Convene an inter-agency digital opportunity workgroup with appointed membership from state agencies representing key partners and covered populations[54]
- Collaborate with MN Housing, Education SuperHighway, North Country Service Cooperative, and other housing partners[55]
- Collaborate with MN Department of Corrections and the MN Career Education Center[56]
- Collaborate with DEED's Office of New Americans[57]

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[50] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[51] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[52] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[53] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[54] State of Minnesota: Digital Opportunity Plan DRAFT p 16
[55] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[56] State of Minnesota: Digital Opportunity Plan DRAFT p 20
[57] State of Minnesota: Digital Opportunity Plan DRAFT p 20

The outcome in each of these instances is the creation of a report or a final meeting. Many of these proposed collaborations, research efforts, and partnerships appear relevant. However, the lack of meaningful goals or objectives is worrisome.

There is a risk that all these outcomes are met without meaningful improvement in the stated digital opportunity key performance indicators that relate to residents' access to devices, high speed home internet, and digital literacy and skills. Will Minnesotans believe that funding research and staff meeting time at the expense of programming is a prudent use of one-time federal funding?

We urge the state to focus on funding implementation rather than creating a library of reports without corresponding action. We are hopeful that the activities to meaningfully plan Minnesota's digital opportunity programs leads to the swift funding and implementation of proven solutions.

Recommendations:

- We urge OBD to focus on funding proven solutions such as digital navigation to sustain and expand the progress already made towards digital equity.
- We encourage research and reports to be matched with recommendations for action, or for proposed policy changes to meet our shared goal of "a future where **digital equity connects all Minnesota residents to opportunities, options, and each other."**[58]

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[58] State of Minnesota: Digital Opportunity Plan DRAFT p 6

September 29, 2023

Bree Maki
Executive Director, Office of Broadband Development
Minnesota Department of Employment & Economic Development
Via Electronic Delivery

Re: Feedback on the Minnesota Draft Digital Opportunity Plan

Dear Ms. Maki:

We appreciate the opportunity to provide input to the Minnesota Draft Digital Opportunity Plan, and we're grateful for the leadership of your office and the Biden Administration in working to build digital equity for all Minnesotans. The unprecedented funding provided by the IIJA in ensuring "Internet for All," across urban, suburban and rural areas of our state, is a crucial opportunity. As our jurisdictions are home to more nearly one-third of all Minnesotans, we want to ensure that the final Plan guides the forthcoming federal funds in ways that adequately address the critical needs of every resident. Our staff have written separately to provide important details in this regard.

We urge you to include in the final Plan a clear recognition of two factors that we do not see adequately addressed in the Draft Plan:

1. **As each of our county boards have recognized racism as a public health crisis, it is important for the final Plan to view digital opportunity within the context of deliberate, historical under-investment in communities of color.** When broadband access closely tracks historical redlining, and adequate broadband infrastructure is also glaringly lacking—as has been [documented][1] [recently][2]—we urge the State to partner with us and fund the work that addresses unique injustices that were decades in the making and whose effects are evident to this day. We are concerned that the Draft Plan's proposals for noncompetitive grants will minimize the overall impact of the Digital Equity Act in Minnesota. Given the disproportionate negative impacts of the Digital Divide in our communities, we urge your office to provide disproportionate support to help eliminate them.

2. **The State should support the best practices and new digital inclusions programs that we have piloted during the pandemic and recovery period.** We have taken the CARES and ARP periods as an opportunity to develop pilot programs and stand-up best practices for digital equity. We do not see our one-time investments as a substitute for the five-year program that your office is developing for the State, and we echo what you have heard elsewhere: the final Plan should clearly identify that State funding will be allocated for programs that have positively affected thousands of our residents since the beginning of the pandemic, and should be continued, as

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[1] https://sahanjournal.com/business-work/century-link-internet-speed-minneapolis-redlining-black-brown-broadband/

[2] https://www.startribune.com/in-minneapolis-disparities-in-internet-package-speeds-can-depend-on-address/600227834/

opposed to over-leveraging capacity dollars for continued research, planning and facilitation. We hope to join you in looking back at the Digital Equity Act as a catalyst for connecting Minnesota, not as a tool for studying strategies that are already known to be effective.

The work your office has done to form and gather digital connection committees, forge partnerships, create plans and conduct research is important. At the same time, we urge you not to lose sight of the results our organizations have achieved through proven strategies and localized community recommendations that warrant specific mention in the final Plan, and funding from an historic infrastructure law. We are proud of our achievements to date, and we are looking to your office to support continued efforts as we work together to achieve Internet for All Minnesotans.

Sincerely,

Irene Fernando, Chair
Hennepin County Board of Commissioners

Trista Martinson, Chair
Ramsey County Board of Commissioners

Bradley Werner
Attorneys at Law

September 27, 2023

Office of Broadband Development
Attn: Ms. Hannah Buckland, Digital Opportunity Plan
Great Northern Building
180 5th St. E
St. Paul, MN 55101

Re: Comments on Draft Digital Opportunity Plan
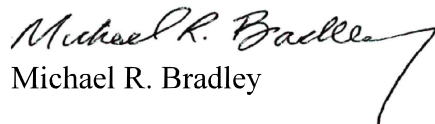
Dear Ms. Buckland:

Attached are Comments on the draft Digital Opportunity Plan from the following Minnesota municipal entities, with a collective population of over 1.2 million:

- City of Minneapolis;
- Northwest Suburbs Cable Communications Commission;
- North Metro Telecommunications Commission;
- South Washington County Telecommunications Commission;
- North Suburban Communications Commission;
- City of Coon Rapids; and
- City of Columbia Heights

We would welcome the opportunity to speak with you further as you continue your drafting.

Very Truly Yours,

BRADLEY WERNER, LLC

Michael R. Bradley

c.   Ms. Greta Bergstom
      Ms. Shannon Slatton Schwartz
      Ms. Heidi Arnson
      Mr. Mark Martinez
      Mr. Jeff Ongstad
      Mr. Eric Stouse
      Mr. Will Rottler

Local Governments' Digital Opportunity Plan Comments

These comments on the Office of Broadband Development's ("OBD") Digital Opportunity Plan are submitted on behalf of the city of Minneapolis, Minnesota; Northwest Suburbs Cable Communications Commission; North Metro Telecommunications Commission; South Washington County Telecommunications Commission; North Suburban Communications Commission; City of Coon Rapids, Minnesota; and City of Columbia Heights (collectively, the "Local Governments"),[1] These jurisdictions and organizations represent a diverse range of residents with a population exceeding 1,236,952. The Local Governments support OBD's goal of ensuring all Minnesotans have equal access to broadband services. We have decades of experience working toward similar goals by requiring universal buildout of networks and providing consumer protection and other public benefits through the cable franchising process. The Local Governments stress the importance of OBD partnering with local governments to leverage our extensive experience and local resources as a critical step in ensuring the Digital Opportunity Plan fulfills its goals.

Many of the Local Governments made the following recommendations to OBD prior to release of the draft Digital Opportunity Plan:

1. Recommend the use of local franchising for ensuring equal access to broadband service throughout the state;
2. Recommend that broadband providers using public property should provide public benefits to further the goals of digital equity in the state; and
3. Recommend necessary changes in state and federal law to ensure state and local governments have the necessary authority to achieve digital equity in the delivery of broadband service.

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[1] The commenting Minnesota municipal entities and their populations are: City of Minneapolis, (425,096); Northwest Suburbs Cable Communications Commission (collective population 356,048) (a Minnesota municipal joint powers commission consisting of the cities of Brooklyn Center (33,782), Brooklyn Park (86,478), Crystal (23,330), Golden Valley (22,552), Maple Grove (70,253), New Hope (21,986), Osseo (2,688), Plymouth (81,026), and Robbinsdale (13,953)); North Metro Telecommunications Commission (collective population 129,470) (a municipal joint powers commission consisting of the cities of Blaine (71,803), Centerville (4,027), Circle Pines (5,025), Ham Lake (16,843), Lexington (2,922), Lino Lakes (21,753), and Spring Lake Park (7,097)); South Washington County Telecommunications Commission (collective population 125,863) (a municipal joint powers commission consisting of the municipalities of Woodbury (75,102), Cottage Grove (41,027), Newport (3,941), Grey Cloud Island Township (249), and St. Paul Park (5,544)); North Suburban Communications Commission (collective population 115,117) (a municipal joint powers commission consisting of the cities of Arden Hills (9,939), Falcon Heights (4,963), Lauderdale (2,212), Little Canada (10,819), Mounds View (12,946), New Brighton (23,454), North Oaks (5,273), Roseville (36,254), and St. Anthony (9,257)); City of Coon Rapids (pop. 63,385); City of Columbia Heights (pop. 21,973).

These recommendations are not included in the draft Plan, though they appear to be acknowledged in the following statement regarding the "limitations" of the Plan:

> This plan exists in the middle of a particular kind of tension between what is permissible and what is needed. The gaps in digital opportunity that many individuals confront daily are often a consequence of long-term gaps in federal, state, and local policy that have allowed people to be left behind. For gaps to be closed in the long-term, new federal, state, and local policies need to be in place. Without addressing the inequities built into this system, the same gaps will remerge and persist. It is, however, outside of the purview of OBD to independently recommend policy changes, serve as a regulatory body, or propose regulatory reform.[2]

We urge OBD to reconsider its position that it is "outside the purview of OBD to independently recommend policy changes[.]" OBD has the express statutory authority—and "duty"—to "coordinate with state, regional, local, and private entities to develop … a uniform statewide broadband access and usage policy" and to "develop, recommend, and implement a statewide plan to encourage cost-effective broadband access … ."[3] OBD also must include in its annual report policy suggestions and proposals.[4]

The draft Plan appropriately recognizes that policy gaps hinder OBD's ability to craft a plan to achieve Minnesota's broadband goals. As the State's expert agency on broadband access, OBD should elaborate on those policy gaps and recommend solutions the State could pursue. The lack of local authority to franchise broadband providers is precluding local governments from partnering with OBD to ensure equal access to broadband for all of our residents. We urge OBD to address matter in the Digital Opportunity Plan by, at a minimum, (1) addressing the benefits of local franchising and (2) urging the Legislature to provide authority for local broadband franchising.

Benefits of Local Franchising in Ensuring Broadband Opportunities

We urge OBD to revise the Digital Opportunity Plan to acknowledge that local franchising can help ensure equal access to broadband service throughout the state by requiring that broadband providers using public property provide public benefits to further the goals of digital equity. The Local Governments' original recommendations to OBD establish the benefits of local franchising in ensuring better outcomes for Minnesotans. We will not reiterate those comments here, but urge OBD to review those comments for including in the Plan.

As noted in those comments, this recommendation is consistent with that made by FCC's Communications Equity and Diversity Council ("CEDC"), a federal advisory committee with appointed members from public interest groups, think tanks, and industry organizations. FCC Chairwoman Rosenworcel tasked the CEDC with making recommendations to fulfill the FCC's

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[2] Draft Digital Opportunity Plan at p. 8.
[3] Minn. Stat. § 116J.39, subd. 4(a)(2)-(3).
[4] Minn. Stat. § 116J.39, subd. 5(b)(6)-(7).

obligation under Section 60506(d) of the Infrastructure Investment and Jobs Act to "develop model policies and best practices that can be adopted by States and localities to ensure that broadband internet access service providers do not engage in digital discrimination."[5] The CEDC's final Recommendations and Best Practices to Prevent Digital Discrimination and Promote Digital Equity recognize the long-standing efforts of local governments to promote nondiscriminatory access to communications services through franchises and rights-of-way management.[6] The CEDC expressly recommended that "[a]greements to use the rights-of-way should reflect that the privilege of using public assets comes with an obligation to provide a benefit to the public, which includes ensuring that all members of the community have equal access to broadband, subject to economic and technological feasibility."[7]

OBD should follow the CEDC's lead in recognizing the benefits of local franchising and the need for entities enjoying the use of public assets to provide adequate public benefits in return for such use. Local governments are key partners in that effort.

Legislative Changes in Minnesota

We further urge OBD to make an express recommendation to the Legislature to authorize local franchising of broadband providers. This is consistent with the CEDC's recommendation that "States should examine their statutes and policies to ensure broadband providers benefitting from public assets provide appropriate public benefits to address potential digital discrimination."[8] The lack of clear authority in Minnesota law for local governments to franchise broadband providers is a hinderance to providing digital opportunities to all Minnesotans and to preventing digital discrimination.

A clear recommendation in the Digital Opportunity Plan to address this policy gap in Minnesota law would help local governments better partner with OBD in addressing digital equity and digital discrimination. We ask OBD to include such a recommendation in its final Plan.[9]

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[5] 47 U.S.C. § 1754(d).

[6] Recommendations and Best Practices to Prevent Digital Discrimination and Promote Digital Equity at 31.

[7] *Id*. at 35.

[8] *Id*.

[9] The Local Governments continue to recommend other legislative changes described in our original comments, including rolling back the small cell legislation passed in 2017, which has given wireless providers unprecedented access to local assets yet has not resulted in the widespread rollout of fifth generation small cell wireless services providers promised. Further, several FCC rules, such as the Mixed Use Rule and Small Cell Order, interfere with local governments' ability to address broadband-related build-out and services and should be repealed.

Conclusion

The Local Governments applaud OBD for drafting an extensive and thoughtful Digital Opportunity Plan. OBD can and should do more, however, by addressing some of the policy gaps that will preclude any plan from achieving the goal of ensuring all Minnesotans have equal access to digital opportunity. The Local Governments look forward to partnering with OBD on this critical goal.