

New York State Digital Equity Plan



ConnectALL Office
Empire State Development
State of New York



This report was prepared by the ConnectALL Office using federal funds under award #36-30-DP170 from the National Telecommunications and Information Administration (NTIA), U.S. Department of Commerce. The statements, findings, conclusions, and recommendations are those of the authors and do not necessarily reflect the views of NTIA nor the U.S. Department of Commerce.

Table of Contents

Table of Contents	3
List of Tables	6
List of Figures	7
Acronym Guide	8
1.0 Executive Summary	11
1.1 ConnectALL’s Vision for Digital Equity	12
1.2 Strategies & Approach	13
1.3 Current State of Digital Equity	13
1.4 Stakeholder Engagement.....	14
1.5 Implementation Plan	15
2.0 Unified Vision	17
2.1 ConnectALL Office	17
2.2 ConnectALL’s Planning Process.....	18
2.3 Alignment with Existing Efforts to Improve Outcomes.....	19
2.3.1 Economic and Workforce Development.....	20
2.3.2 Education.....	20
2.3.3 Health	21
2.3.4 Civic Engagement	22
2.3.5 Delivery of Government Services	23
2.4 Strategy and Objectives	24
2.4.1 Theory of Change, Strategies and Sample Activities.....	24
2.4.2 The Five Measurable Objectives	28
2.4.3 Coordination of Funding	31
3.0 State of Digital Equity in New York	33
3.1 Asset Inventory	33
3.1.1 Digital Inclusion Assets by Covered Population.....	34
3.1.1.1 Assets Advancing Broadband Affordability & Availability	35
3.1.1.2 Assets Advancing Accessibility of Devices & Device Support.....	36
3.1.1.3 Assets Advancing Digital Literacy	37
3.1.1.4 Assets Advancing Privacy & Cybersecurity.....	38
3.1.1.5 Assets Advancing Accessibility & Inclusivity of Public Resources	38
3.1.2 Existing Digital Equity Plans	38
3.1.2.1 Federal and New York State Plans, Resources, and Reports.....	39
3.1.2.2 County and Municipal Plans, Resources, and Reports	39
3.1.2.3 Libraries and Schools Plans, Resources, and Reports	40
3.1.2.4 Resources by Nonprofits, Philanthropies, and Community Based Organizations	40
3.1.3 Existing Digital Equity Programs Operated by New York State Government.....	41
3.1.4 Broadband Access, Affordability, and Adoption Statewide	44

3.1.5 Broadband Affordability	45
3.1.5.1 Affordable Connectivity Program (ACP) Uptake	45
3.1.5.2 Efforts to Increase ACP Program Enrollment.....	45
3.1.5.3 Other Broadband Affordability Programs	46
3.2 Needs Assessment	47
3.2.1 Existing Conditions by Covered Population	53
3.2.1.1 Aging Individuals.....	56
3.2.1.2 Formerly Incarcerated Individuals	59
3.2.1.3 Individuals with Disabilities.....	61
3.2.1.3a Further Engagement with People with Disabilities	62
3.2.1.4 Individuals with Language Barriers	64
3.2.1.5 Low-income Households.....	66
3.2.1.6 Racial and Ethnic Minorities.....	68
3.2.1.7 Rural Inhabitants.....	70
3.2.1.8 Veterans.....	71
3.2.1.9 Other Communities	73
3.2.2 Regional Needs Assessment.....	76
3.2.2.1 Regional Snapshots Notes.....	94
3.2.3 Digital Equity Needs, Barriers, and Assets Gap Analysis	97
3.2.3.1 Broadband Affordability & Availability	97
3.2.3.2 Accessibility of Devices and Device Support	100
3.2.3.3 Digital Literacy	103
3.2.3.4 Privacy & Cybersecurity.....	105
3.2.3.5 Accessibility & Inclusivity of Public Resources.....	107
4.0 Stakeholder Engagement.....	110
4.1 Engagement Methods	111
4.2 Statewide Engagement.....	115
4.2.1 Broadband Deployment Advisory Committee	115
4.2.2 Digital Equity Task Force.....	115
4.2.3 New York State Internet Access Survey	119
4.2.4 Industry and Stakeholder Forums.....	119
4.2.5 Tribal Nation Engagement.....	120
4.2.6 Incarcerated Individuals Engagement	120
4.2.7 Market Sounding and Stakeholder Interviews	120
4.3 Regional Engagement & Participatory Planning	121
4.3.1 Counties, Municipalities, and Regional Planning Councils (RPCs).....	122
4.3.2 Digital Equity Focus Groups	123
4.3.3 Regional Data-Gathering for the Needs Assessment and Asset Inventory.....	123
4.4 Implementation Phase Engagement Strategy.....	124
4.4.1 Public Comment	124
4.4.2 Public Engagement and Comment Response	125
5.0 Implementation	127
5.1 Implementation Strategy: Key Activities	127

5.1.1 Broadband Availability and Affordability Strategy	127
5.1.2 Accessible Device & Device Support Strategy	130
5.1.3 Digital Literacy Strategy.....	133
5.1.4 Privacy & Cybersecurity Strategy	135
5.1.5 Accessibility & Inclusivity of Public Resources Strategy	136
5.2 Implementation Strategy: Leveraging Assets.....	138
5.3. Implementation Strategy: Assets as Metrics	141
5.3.1 Developing and Sustaining New York’s Digital Equity Ecosystem.....	141
5.3.2 Establishing a Baseline: Assets as Metrics of Meaningful Change.....	142
5.3.2.1 Defining an Asset.....	142
5.3.3 Baseline of Assets by Measurable Objectives	143
5.3.4.1 Broadband Availability & Affordability	144
5.3.4.2 Devices	144
5.3.4.3 Digital Literacy	145
5.3.4.4 Cyber Security & Privacy	145
5.3.4.5 Accessibility of Public Resources & Services.....	146
5.4 Implementation Strategy: Closing the Digital Divide In New York State.....	146
5.5 Implementation Strategy: Proposed Timeline	148
5.6 Implementation Strategy: Evaluation	151
6.0 Conclusion	156
7.0 Research Methodology	158
7.1 Survey Distribution Methodology	158
7.2 Survey Data Analysis Methodology	162
7.3 Focus Group Methodology.....	168
7.4 Intersectionality of Covered Populations.....	171
7.5 Glossary.....	172
Document Change Log	174
8.0 Appendix	175
8.1 Plans, Resources, and Reports.....	175
8.1.1 Federal and New York State Plans, Resources, and Reports	175
8.1.2 County and Municipal Plans, Resources, and Reports.....	179
8.1.3 Libraries and School Plans, Resources, and Reports.....	180
8.1.4 Resources by Nonprofits, Philanthropies, and Community Based Organizations	187
8.1.5 Other Resources and Tools Published by Nonprofit or Community-Based Organizations	193
8.2 Public Comment Record and Response	195

List of Tables

Table 1: Current and Recent New York State Broadband Equity Activities42

Table 2: Digital Equity Coalitions44

Table 3: Intersection between Affordable Housing Residents and Covered Populations75

Table 4: Broadband Affordability & Availability Gap Analysis97

Table 5: Accessibility of Devices and Device Support Gap Analysis101

Table 6: Digital Literacy Gap Analysis104

Table 7: Privacy & Cybersecurity Gap Analysis.....106

Table 8: Accessibility & Inclusivity of Public Resources Gap Analysis107

Table 9: Crosswalk of Stakeholders and Engagement Methods112

Table 10: Digital Equity Task Force Committee Summary Information117

Table 11: Digital Equity Coalitions & Other Organizations Serving as Regional Partners ...121

Table:12 Survey Sample (Unweighted) Descriptive Statistics: Regions160

Table:13 Survey Sample (Unweighted) Descriptive Statistics: Covered Populations161

Table:14 Survey Data Cleaning Methodology162

Table:15 Comparison Between Weighted Survey Responses and Digital Equity Act
Population Viewer Populations165

Table 16: Count of Focus Groups Conducted by State Region168

Table 17: Count of Focus Groups Conducted by Covered Population169

Table 18: New York State Focus Group Codebook Examples170

Table 19: Analysis of Two-Way Intersectionality Among Covered Populations in New York
State (excluding incarcerated individuals)171

List of Figures

Figure 1: Percentages of Respondents Who Do Not Have Broadband Internet at Home, Statewide and by Covered Population.....49

Figure 2: How Survey Respondents Say They Use the Internet Most Frequently50

Figure 3: Percentages of Respondents Whose Households Do Not Have Access to the Internet-Enabled Computer Devices They Need, Statewide and by Covered Population50

Figure 4: Percentages of Respondents Who Find It Difficult (i.e., Somewhat Difficult or Very Difficult) to Navigate the Internet to Do What They Need, Statewide and by Covered Population.....51

Figure 5: Percentages of Respondents Who Are Somewhat Concerned and Very Concerned About Internet Safety, Statewide and by Covered Population52

Figure 6: Percentages of Respondents Who Said Online Public Resources Were Not Very Accessible and Not at All Accessible, Statewide and by Covered Population53

Figure 7: Map of the Regions of New York State.....54

Figure 8: Map of the Concentration of Aging Individuals by State Region56

Figure 9: Map of the Concentration of Incarcerated Individuals by State Region59

Figure 10: Map of the Concentration of Individuals with Disabilities by State Region.....61

Figure 11: Map of the Concentration of Individuals with Language Barriers by State Region64

Figure 12: Map of the Concentration of Low-Income Households by State Region.....66

Figure 13: Map of the Concentration of Racial and Ethnic Minorities by State Region.....68

Figure:14 Map of the Concentration of Veterans by State Region.....71

Acronym Guide

ACP	The FCC's Affordable Connectivity Program, which provides subsidies for low-income and Tribal households to access home broadband subscriptions and/or internet-enabled devices.
ACS	The American Community Survey is an annual demographic survey conducted by the U.S. Census Bureau.
AHCP	ConnectALL's Affordable Housing Connectivity Program (AHCP) will provide owners of affordable housing with new or upgraded broadband infrastructure so tenants can access high-quality home internet at affordable monthly rates.
BAP	DPS's Broadband Assessment Program for broadband data collection and analysis, which resulted in the creation of the State's interactive broadband map and publication of annual reports on broadband availability and affordability in New York.
BEAD	NTIA's Broadband Equity, Access, and Deployment Program, which will provide \$42.45B nationally for broadband infrastructure planning and implementation.
BOCES	Boards of Cooperative Educational Services provide shared, cost-effective educational programs and services to school districts—serving K-12 school students as well as adults seeking GEDs and high-school equivalency courses—outside of the largest urban areas New York City, Buffalo, Rochester, Yonkers, and Syracuse
BPO	The Broadband Program Office, housed within ESD and the predecessor to ConnectALL; all responsibilities and authorities of were transferred to ConnectALL in 2022.
CAI	Community Anchor Institution, defined by NTIA in the BEAD NOFO “an entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations.”
ConnectALL	The ConnectALL Office, a division of ESD, and the State's designated entity for receiving and administering BEAD Program funds.
DEA	The Digital Equity Act is a federal initiative established as part of 2021's Infrastructure Investment and Jobs Act (IIJA) that provides \$2.75 billion to establish grant programs that promote digital equity and inclusion nationwide
DEAPV	Digital Equity Act Population Viewer is an interactive collection of maps created by the NTIA and the U.S. Census Bureau that demonstrate the distribution of covered populations as well as broadband internet availability and adoption statistics by state and county geographies.

DEC	Digital Equity Coalitions are organizations or coalitions of organizations operating in each state region that coordinate efforts across the government, nonprofit, private, and education sectors to end the digital divide.
DETF	The Digital Equity Task Force, an interagency group co-convened by the ConnectALL Office and NYSL, with subcommittees focused on key outcome areas: education, health, workforce development, civic engagement, and the delivery of government services.
DEWG	The Digital Equity Working Group, an interagency group co-convened by the ConnectALL Office and NYSL; the less formal and structured predecessor to the DETF.
DPS	New York State Department of Public Service, responsible for leading ACP outreach, maintaining the State broadband map, and regulating pole attachments in the state, among other responsibilities.
ESD	Empire State Development, New York State's economic development agency and parent agency of ConnectALL.
FCC	The Federal Communications Commission, administrator of the ACP and developer of the National Broadband Map.
IIJA	The 2021 Infrastructure Investment and Jobs Act included the Digital Equity Act.
ISP	Internet Service Provider
NOFO	Notice of Funding Opportunity; specifically, NTIA's Notices of Funding Opportunity for the BEAD and State Digital Equity Planning Grant Programs.
NTIA	The National Telecommunications and Information Administration, administrator of the BEAD Program and State Digital Equity Planning Grant Program.
NYSL	New York State Library, a division of New York State Education Department; co-convenor of the DEWG and DETF
OTI	The New York City Office of Technology and Innovation (OTI) is a New York City department that oversees the use of technology in government operations and the use of technology to deliver services to the public.
PSC	The New York State Public Service Commission, a division of DPS, which regulates and oversees electric, gas, water, and telecommunication industries in the state.
SDEP	A State Digital Equity Plan must include specific elements outlined in the statute and the Notice of Funding Opportunity and be submitted to enable a state to access the State Digital Equity Capacity Grant Program.

1.0

Executive Summary

1.0 Executive Summary

Access to the internet, reliable devices, and digital literacy are vital for the economic success, health, and lifelong learning of all New Yorkers. New York's digital equity practitioners have worked for decades to create sustainable digital equity ecosystems on local, regional, and statewide levels. These practitioners overcame conditions of scarcity in the funding landscape, and a lack of understanding of the importance of digital equity initiatives among many policymakers and members of the public, to build a powerful base of programs, partnerships, and coalitions bringing critical services to communities across the state and advocating for policies that better meet New Yorkers' digital needs.

From decades of experience in the field, practitioners know that achieving digital equity in New York State will require long-term investments across sectors to make progress impactful and sustainable. The COVID-19 pandemic exacerbated digital inequities and laid bare the truth that too many New Yorkers lack the technology and skills needed to effectively use the internet and the tools and services it has to offer. The digital divide will continue to widen and disproportionately impact members of historically overlooked and underserved communities without significant investment across sectors and geographic scales.

The Digital Equity Act (DEA) is a federal initiative established as part of 2021's Infrastructure Investment and Jobs Act (IIJA) that provides \$2.75 billion to establish grant programs that promote digital equity and inclusion nationwide. These programs aim to ensure that all people and communities have the technology, skills, and capacities needed to reap the full benefits of our digital economy and society. The programs will be administered to states by the National Telecommunications and Information Administration (NTIA).

Other IIJA initiatives, such as the Broadband Equity, Access, and Deployment (BEAD) program, will address the digital divide by expanding broadband access and infrastructure. New York's Digital Equity Capacity Grants, administered by the ConnectALL Office, will complement broadband deployment initiatives by promoting a diverse array of digital inclusion projects at the State and local level. These initiatives will focus on populations with barriers to access, such as low-income populations, individuals with disabilities, veterans, rural inhabitants, racial and ethnic minorities, aging individuals, and individuals with language barriers.

In the State Digital Equity Plan (SDEP), ConnectALL meets NTIA's statutory and additional requirements as listed in the State Digital Equity Planning Grant Program Notice of Funding Opportunity. In the SDEP, ConnectALL establishes:

- A vision for digital equity in New York State and the strategies and outcome areas that will guide ConnectALL's digital equity investments (Statutory Requirements 2 and 3, Additional Requirement 1).
- A baseline of digital equity data and assets for the state, including an asset inventory and needs assessment (Statutory Requirement 1, Additional Requirements 2 and 3).

- ConnectALL’s principles for stakeholder engagement, engagement methods used in development of the SDEP, and implementation strategies moving forward, including continued regional engagement and participatory planning (Statutory Requirements 4 and 5, Additional Requirements 4 and 5).
- How ConnectALL will design its digital equity activities and grant programs around measurable objective areas defined in the DEA (Additional Requirements 6, 7, 8, 9, 10).

1.1 ConnectALL’s Vision for Digital Equity

Governor Kathy Hochul established the ConnectALL Office (ConnectALL) in 2022 to transform New York State’s digital infrastructure so all residents and businesses have access to high-speed, reliable, and affordable broadband for education, economic growth, and full participation in civic life.

This vision is pursuant to the principles also articulated by the New York State Legislature in the 2022 Working to Implement Reliable and Equitable Deployment of Broadband Act (WIRED Broadband Act), which declares that:

- Access to high-speed, reliable, and affordable broadband is essential for education, economic growth, and full participation in civic life;
- The persistence of the digital divide is a key barrier to improving the general welfare;
- The digital divide disproportionately affects communities of color, lower-income areas, rural areas, and other vulnerable populations, and the benefits of broadband access should be available to all;
- A robust, competitive internet marketplace in New York supports general economic development and benefits New Yorkers with improved internet service and affordability; and
- The State has a responsibility to assist in ending the digital divide, supporting a more robust and competitive internet marketplace, and carrying out other actions to ensure universal access to high-speed, reliable, and affordable broadband.”¹

Per NTIA’s guidance, ConnectALL will also take actions to promote the general welfare as it relates to the benefits of broadband access across the following outcome areas:

1. Advancement of economic and workforce development goals, plans, and initiatives;
2. Improvement in the quality and accessibility of educational resources;
3. Improvements in access to and delivery of health services;
4. Increased civic and social engagement; and
5. Delivery of accessible, navigable public resources.

¹ WIRED Broadband Act added a new to Chapter 174 of the laws of 1968, constituting the New York State Urban Development Corporation Act. See *WIRED Broadband Act*, New York State Urban Development Corporation Act, Chapter 174: Sect. 1: Sect. 16-gg (2022), at https://www.nysenate.gov/legislation/laws/UDA/16-GG*2.

1.2 Strategies & Approach

ConnectALL's strategy considers the limitations of its resources and is driven by the need to identify multipliers that can amplify and sustain past, present, and future investments. ConnectALL must address needs across a population of approximately 20 million people in ten regions, including the largest, most diverse city in the country. The funding available to ConnectALL is onetime, while the digital divide is perpetual, as technologies, threats, and New Yorkers themselves evolve.

Aligning ConnectALL initiatives with existing digital equity efforts in the state is key to ConnectALL's overarching strategy. ConnectALL, through its predecessor the Broadband Program Office (BPO) and in partnership with the New York State Library (NYSL), has convened representatives from State agencies since 2020 to develop strategy, obtain information on existing State programs and resources, and identify partners to support digital equity planning and program implementation. In the Plan, ConnectALL identifies areas of alignment with existing State initiatives and plans with the digital equity outcome areas.

Building on alignment with these existing efforts to improve outcomes, ConnectALL identified the following strategic pillars, which together will allow ConnectALL to prioritize and streamline activities in pursuit of its mission:

- **Grounding investments in an asset-based approach**, building the capacity of community-rooted and trusted digital equity organizations over the long term.
- **Strengthening networks to share resources and take coordinated action**, investing in ensuring that digital equity organizations and service providers are independently connected, collaborating, and sharing knowledge to achieve shared goals.
- **Building alignment and awareness** across the field and government to advance digital equity policy best practices and standards-setting across programs.
- **Sharpening and socializing ConnectALL's digital equity lens**, incubating new approaches to persistent challenges, measuring impact, and publishing information related to these findings.

In Chapter 2, ConnectALL applies these strategic pillars to proposed activities addressing measurable objectives to realize New York's vision for digital equity.

1.3 Current State of Digital Equity

ConnectALL has identified a baseline of digital equity data and activities in New York presented in Chapter 3. This data informs how ConnectALL considers advancing digital equity. Evidence is presented in two formats:

1. **Digital Equity Asset Inventory**: A crowdsourced, searchable database of programs, organizations, plans, and other resources currently available within the state. These assets will be strengthened and developed with ConnectALL's digital equity investments.

Importantly, assets also serve as a baseline metric for tracking progress over time; and

- 2. Needs Assessment:** A catalogue of the needs and barriers to meaningful internet adoption expressed by populations who have been historically left out of digital advancement. The needs assessment builds on administrative data by introducing new findings from ConnectALL’s stakeholder engagement activities, including focus groups, listening sessions, and ConnectALL’s New York State Internet Access Survey.

To develop the asset inventory and needs assessment, ConnectALL coordinated with regional entities, including Digital Equity Coalitions (DECs) and other partners who have relationships with Covered Populations across the state. Together, the asset inventory and needs assessment reflect New York’s emerging ecosystem, help identify gaps, and enable an empirically defined digital equity roadmap to reach proposed long-term outcomes.

1.4 Stakeholder Engagement

ConnectALL worked with DECs in every region of the state to conduct stakeholder engagement events, gather data, and solicit feedback that has informed this Plan. Engagement activities included:

- 47 stakeholder focus groups targeting members of historically marginalized groups.
- 15 listening sessions, held in every region and borough of the state, attended by over 1,200 New Yorkers.
- ConnectALL’s Digital Equity Survey of New York residents, the first ever comprehensive assessment of the digital divide in New York State, received more than 5,700 responses.

ConnectALL also consulted various local governments and state agencies to ensure recommendations were made in alignment with their existing efforts. Stakeholder engagement centered the experience and expertise of covered populations through a participatory planning process created with regional DECs. Ensuring the capacity and leadership of regional DECs remains a key priority towards implementation of ConnectALL’s digital equity and broadband infrastructure plans.

The Plan’s multifaceted stakeholder engagement strategy reflects the exceptional diversity of New York State residents and leverages the state’s ecosystem of broadband and digital equity stakeholders. Comprehensive public engagement provided:

- Full geographic coverage,
- Diverse stakeholders,
- Awareness, outreach, and participation,
- Transparency, and
- Targeted engagement for underrepresented communities.

1.5 Implementation Plan

Using the assets, needs, and gaps identified in the Plan, ConnectALL aims to align its digital equity investments with the State outcome areas, presented in Chapter 5: Implementation as a set of measurable objectives, associated key activities, proposed metrics, an evaluation, and timeline. Objectives are categorized by the four pillars of ConnectALL's strategic vision:

- **Strategy 1: Ground Investments in an Asset-Based Approach**
- **Strategy 2: Strengthen Networks to Share Resources & Take Coordinated Action**
- **Strategy 3: Build Alignment & Awareness**
- **Strategy 4: Sharpen & Socialize our Digital Equity Lens**

Sections are organized by measurable objective areas designated in the Digital Equity Act²:

- Broadband Affordability & Availability
- Accessibility of Devices & Device Support
- Digital Literacy
- Privacy & Cybersecurity
- Accessibility & Inclusivity of Public Resources

Detailed activities are not exhaustive. Instead, they reflect approaches to meeting needs and filling gaps identified throughout the Plan.

ConnectALL looks forward to executing these strategies and deepening our engagement on the many facets of the digital divide across New York's diverse regions. By mobilizing millions of dollars in funding through the Digital Equity Act, all New Yorkers will be able to access the technology, skills, and capacities and gain the full benefits of the state's digital economy and society.

² H.R.1841-117th Congress (2021-2022): Digital Equity Act of 2021, H.R.1841, 117th Cong. (2021), at <https://www.congress.gov/bill/117th-congress/house-bill/1841/text>.

2.0

Introduction, Vision, and Objectives

2.0 Unified Vision

Governor Kathy Hochul established ConnectALL in 2022 to transform New York State’s digital infrastructure so all residents and businesses have access to high-speed, reliable, and affordable broadband for education, economic growth, and full participation in civic life. This vision reflects principles articulated by the New York State Legislature in the 2022 Working to Implement Reliable and Equitable Deployment of Broadband Act (WIRED Broadband Act), which declares that:

- Access to high-speed, reliable, and affordable broadband is essential for education, economic growth, and full participation in civic life;
- The persistence of the digital divide is a key barrier to improving the general welfare;
- The digital divide disproportionately affects communities of color, lower-income areas, rural areas, and other vulnerable populations, and the benefits of broadband access should be available to all;
- A robust and competitive internet marketplace in New York supports general economic development and benefits New Yorkers with improved internet service and affordability; and
- The State has a shared responsibility to assist in ending the digital divide, supporting a more robust and competitive internet marketplace, and carrying out other actions to ensure universal access to high-speed, reliable, and affordable broadband.³

Per NTIA’s guidance, ConnectALL will also take actions to promote the general welfare as it relates to the benefits of broadband access across the following outcome areas:

1. Advancement of economic and workforce development goals, plans, and initiatives;
2. Improvement in the quality and accessibility of educational resources;
3. Improvements in access to and delivery of health services;
4. Increased civic and social engagement; and
5. Delivery of accessible, navigable public resources.

2.1 ConnectALL Office

ConnectALL will mobilize more than \$1 billion in public investments to connect New Yorkers to broadband in rural and underserved areas, statewide. Governor Hochul announced five new grant programs as a framework for ConnectALL’s public investments:⁴

- **State Digital Equity Plan (SDEP) and grant program** to support New Yorkers’ use of the internet to participate in society, democracy, and the economy.

³ See *WIRED Broadband Act* at https://www.nysenate.gov/legislation/laws/UDA/16-GG*2.

⁴ “Governor Hochul Announces New \$1 Billion ‘ConnectALL’ Initiative to Bring Affordable Broadband to Millions of New Yorkers,” (posted Jan. 5, 2022), at <https://www.governor.ny.gov/news/governor-hochul-announces-new-1-billion-connectall-initiative-bring-affordable-broadband>.

- **Rural Broadband Grant Program** for areas lacking broadband infrastructure (“ConnectALL Deployment Program”).
- **Local Connectivity Planning and 21st Century Municipal Infrastructure Grant Program** for municipalities, nonprofits, and other entities to construct open and accessible public broadband infrastructure (“Municipal Infrastructure Program”).
- **Affordable Housing Connectivity Program**, a partnership with New York Homes and Community Renewal to retrofit affordable housing with broadband installations as part of the agency's overall housing plan.
- **Connectivity Innovation Grant Program** to develop creative broadband solutions and ensure New York is a global leader in pioneering future breakthroughs.

Governor Hochul included three additional initiatives as part of ConnectALL:

- Promote the federal government’s **Affordable Connectivity Program (ACP)**.⁵
- **Develop a Broadband Assessment Program and Interactive Map**, administered by the New York State Department of Public Service.
- **Streamline Broadband Construction** by eliminating fees, removing outdated regulations, and leveraging existing state assets.

ConnectALL will invest at least \$50 million in compliance with NTIA’s program parameters slated for release in 2024. ConnectALL will make grants in line with the principles, strategy, and objectives detailed below.

2.2 ConnectALL’s Planning Process

Comprehensive stakeholder engagement was a key component of ConnectALL's digital equity planning process. By leveraging a growing ecosystem of broadband and digital equity partnerships, and collaborating with intergovernmental partners, established community-based organizations, service providers, the private sector, and representatives of Covered Populations as well as lived experts themselves, ConnectALL has produced a community-informed plan (see **Chapter 4.0 Stakeholder Engagement** for detail).

ConnectALL adopted five digital equity principles to drive this work. These principles strongly resonated with diverse stakeholders across the state and will be used during implementation to align activities across programs and funding sources:

- **Equity:** All residents and businesses should have the internet, digital literacy, and devices to participate fully in our society, democracy, and economy.
- **Performance:** All internet service should be reliable and of high quality, delivered with excellent customer service and providing safe, rewarding quality jobs.

⁵ At the time of this publication, the Affordable Connectivity Program (ACP) provided eligible New Yorkers a discount of up to \$30 a month toward internet service and up to \$100 for a new computer or other connected device, at <https://www.affordableconnectivity.gov/do-i-qualify/>.

- **Choice:** All residents and businesses should be able to determine their service provider, service plans, and modes of digital engagement.
- **Affordability:** No one should be denied internet service because of an inability to pay.
- **Safety:** All residents should have privacy, security, and dignity online, and our use of the internet should enhance our well-being.

2.3 Alignment with Existing Efforts to Improve Outcomes

ConnectALL aligns its Digital Equity program with the efforts of State agencies across the five outcome areas described in this chapter. ConnectALL, through its predecessor the Broadband Program Office and in partnership with the New York State Library (NYSL), has convened representatives from State agencies since 2020 to develop strategy, obtain information on existing programs and resources, and identify partners to support digital equity planning and program implementation.

In Spring 2023, ConnectALL and NYSL established the Digital Equity Task Force (DETF) with a subcommittee for each of the five outcome areas. ConnectALL and NYSL identified State agency co-chairs that have expertise in the outcome areas and serve covered populations to lead each subcommittee and convened a town hall for each subcommittee throughout Summer 2023. In total, more than 550 key stakeholders provided targeted input through public town halls for inclusion in New York’s State Digital Equity Plan, including the vision for each outcome area presented in **Chapter 2.4.2 Measurable Objectives**.

Through the DETF, ConnectALL reviewed plans from State agencies represented on the Task Force along with supplementary State, regional, county, and local strategic plans. ConnectALL identified initial findings and areas of alignment in existing State initiatives and plans with the digital equity outcome areas. Across all five outcome areas, public libraries in New York State have played a significant role in bridging the digital divide. The New York State Education Department 2021 report identified the opportunity for both the state and local governments to invest in public libraries to build capacity to provide accessible computer centers, public internet access and hotspots, and digital literacy training, and as a trusted partner to increase public awareness of affordability broadband service options.⁶

ConnectALL will continue to align its digital equity planning with efforts across the state to ensure New York’s investments further goals in key outcome areas.

⁶ Horrigan, John. “New York’s Digital Divide: Examining Adoption of Internet and Computers for the State and Its Library Districts.” New York State Library (pub. Apr. 2021), at <https://www.nysl.nysed.gov/libdev/documents/HorriganReportNY.pdf>.

2.3.1 Economic and Workforce Development

In her *2023 State of the State: Achieving the New York Dream*,⁷ Governor Hochul made commitments relating to digitally inclusive workforce development:

- Invest \$200 million in digital transformation and IT infrastructure across the State university system.
- Invest \$75 million for transformational initiatives at campuses that support innovation, to help meet the workforce needs of the future and provide needed support to students.
- Transform Department of Labor Career Centers into “Community Training and Career Centers” with additional professional skills trainers that provide unemployed and underemployed New Yorkers with no-cost training in high-need areas such as digital and financial literacy.
- Retool the Department of Labor CareerZone Platform for youth, young adults, and Digital Literacy learners to explore career paths and develop baseline professional skills required by employers from all sectors.

These commitments align with the following recommendations to improve outcomes in this area from the DETF Subcommittee on Economic and Workforce Development:

- Foster relationships between community organizations and employers to build the necessary bridges and pipelines to jobs, support new employees after they enter employment, and consider the needs of employees in every region across the state.
- Raise awareness around community-based organizations, housing providers, social service agencies, and quasi-governmental actors that offer training and support, and of those developing programming in complement to those already in existence.
- Implement strategies for sourcing and retaining diverse talent for digital literacy training programs.
- Encourage industry leaders to establish and administer workforce development programs to provide vital training, credentials, and certifications needed to sustain employment.

2.3.2 Education

NYSL makes the following recommendations to the State in its report “Achieving Digital Equity in New York: An Outline for Collaborative Change”⁸:

- Develop place-based digital equity coalitions and regional/local digital equity plans.
- Shift away from building-restricted Wi-Fi and device loaning to household internet and device ownership.

⁷ New York State Office of the Governor. “2023 State of the State: Achieving the New York Dream,” Jan. 10, 2023, at <https://www.governor.ny.gov/programs/2023-state-state>.

⁸ Moore, Lauren. “Achieving Digital Equity in New York: An Outline for Collaborative Change.” New York State Library, Jun. 2021, at <https://www.nysl.nysed.gov/libdev/DigitalEquityNY.pdf>.

- Develop digital stewardship models to include community members in development of digital equity solutions.

These recommendations reflect digital equity solutions recommended by the DETF Subcommittee on Education to improve educational outcomes across the state:

- Encourage partnerships between government, educators, communities, and corporations to develop a comprehensive and unified vision for digital equity by defining broadband as a fundamental right, ensuring accessibility to all citizens and enabling them to pursue a quality education.
- Foster digital fluency across age groups, subjects, and socioeconomic backgrounds.
- Provide accessible devices and tech support to bridge digital divides and promote equitable learning opportunities, especially for English language learners.
- Raise awareness so learners can develop online safety, and provide accessible training to empower people to navigate the internet without major concern about data privacy.

2.3.3 Health

Governor Hochul’s Telehealth Capital Program and the New York State Psychiatric Association’s report on “The Future of Telehealth in New York State” exemplify the State’s support of the development and deployment of innovative telehealth tools to help close the healthcare equity gap.^{9,10} The Governor also announced significant investments to overhaul New York State’s mental health care continuum, including requiring payment parity for behavioral health telehealth services.¹¹ Regarding older adults’ access to healthcare, the Governor issued Executive Order 23 in November of 2022 to call for the creation of a Master Plan on Aging, which is currently in development by the NYS Department of Health and NYS Office for the Aging, building on decades of work and partnerships between State agencies, local governments, and other stakeholders.¹²

These activities are in alignment with the following digital equity solutions put forward by the DETF Subcommittee on Health:

- Establish peer-led digital literacy training programs, where individuals who are digitally proficient and from diverse backgrounds can educate and support others.

⁹ New York State Office of the Governor. “Governor Hochul Announces \$3 Million in New Grants to Expand Access to Telehealth across All New York Regions,” Nov. 23, 2021, at <https://www.governor.ny.gov/news/governor-hochul-announces-3-million-new-grants-expand-access-telehealth-across-all-new-york>.

¹⁰ Minot, David. “The NYSPA Report: The Future of Telehealth in New York State.” NY State Psychiatric Association, Mar. 31, 2021, at <https://behavioralhealthnews.org/the-nyspa-report-the-future-of-telehealth-in-new-york-state/>.

¹¹ New York State Office of the Governor. “Governor Hochul Announces Details of \$1 Billion Plan to Overhaul New York State’s Continuum of Mental Health Care,” Feb. 2, 2023, at <https://www.governor.ny.gov/news/governor-hochul-announces-details-1-billion-plan-overhaul-new-york-states-continuum-mental>.

¹² New York State Office of the Governor. “Governor Hochul Signs Executive Order to Create New York’s First-Ever Master Plan for Aging,” Nov. 4, 2022, at <https://www.governor.ny.gov/news/governor-hochul-signs-executive-order-create-new-yorks-first-ever-master-plan-aging>.

- Support and encourage partnerships between community institutions such as libraries, community centers, schools, and senior centers towards the creation of hubs for digital health literacy workshops, access points for devices, and spaces for individuals to connect and learn.
- Create mobile units equipped with devices and internet connectivity to reach underserved and rural areas, offering on-site digital literacy training, telehealth demonstrations, and assistance in accessing health resources.
- Develop culturally tailored digital health resources, guides, and tutorials that resonate with different communities.
- Collaborate with government agencies to allocate funds for digital health literacy programs.
- Work closely with healthcare providers to integrate digital health literacy training into patient care.
- Create user-friendly online platforms that offer a variety of digital health literacy courses covering topics ranging from basic device usage to navigating telehealth appointments and managing health records.
- Launch campaigns to raise awareness about the importance of digital health literacy.

2.3.4 Civic Engagement

During the planning process, ConnectALL identified a lack of New York State services and initiatives explicitly related to civic engagement. The civic engagement outcome area is central to ConnectALL’s theory of change, represented by the multiplier activities under “Developing Networks of Action & Advocacy,” detailed in **Chapter 2.4.1 Theory of Change, Strategies and Sample Activities**.

Access to the internet enables civic participation. As civic engagement (ex: individuals learning about and contacting those who represent them in government, communities organizing campaigns, demonstrations, and other forms of advocacy) increasingly exists in the digital world, Covered Populations who already face structural barriers to civic engagement may have new hurdles to participation. Increasing awareness of digital equity services and better service delivery will enable the State to generate policy priorities that represent, and continually innovate to meet, the needs of all New Yorkers.

The NYS Office for New Americans (ONA) takes this approach in furthering its mission to assist individuals and families with their civic and economic engagement in the state. For example, through a public-private partnership, ONA sponsors and implements Cell-Ed, a digital tool accessible on any mobile device. The tool hosts a large course catalog, including civics courses to help immigrants pass their U.S. Naturalization Exam.¹³ ONA offers naturalization support, civics test preparation, workshops at Opportunity Centers across the state, and online

¹³ New York State Department of State. “Cell-Ed.” (accessed Oct. 13, 2023), at <https://dos.ny.gov/cell-ed>.

legal help to apply for citizenship through Citizenshipworks.^{14,15} Programs like Cell-Ed, and the resources available to New Americans at Opportunity Centers and through Citizenshipworks, are examples of how vital internet access is to New Americans' ability to participate in civic life in New York.

The DETF Civic Engagement subcommittee prioritizes future Digital Equity initiatives that:

- Develop policy and advocacy vehicles to highlight and address structural barriers to universal internet access, inclusive of promoting ease of application and eligibility to the ACP (and other low-cost service tiers).
- Pool resources from community organizations, educational institutions, government bodies, and technology companies so that existing community hubs have capacity to expand internet access, training, and support.
- Encourage collaboration between schools, community organizations and parents to develop comprehensive youth-centered and age-specific digital literacy programs, inclusive of online safety and mentorship opportunities.

2.3.5 Delivery of Government Services

Efficiently connecting New Yorkers to critical benefits and services is a priority for the State. In 2023, Governor Hochul announced a plan to streamline access to government agencies, shorten processing times, and improve access to childcare assistance, tax credits, and critical food benefits. Digital access and skills are increasingly required to navigate public resources. Accordingly, the effectiveness of these initiatives will rely on continued investment in digital literacy services and thoughtful design. The Office of Children and Family Services, NYS Office of Information Technology Services, Department of Health, Department of Taxation and Finance, Department of Motor Vehicles, and others will be involved in this multi-agency initiative. Additionally, the New York State Council on Developmental Disabilities (CDD) has programs to improve digital services for people with developmental disabilities, including the creation of training resources for people with developmental disabilities and funding for accessible information and plain language training.^{16,17}

The NYS DDPC championed several digital equity initiatives in the report “Digital Equity for People with Developmental Disabilities,” including¹⁸:

¹⁴ New York State Department of State. “Opportunity Centers - Civics.” (accessed Oct. 13, 2023), at <https://dos.ny.gov/opportunity-centers-1>.

¹⁵ Office of New American. “Citizenshipworks.” (accessed Oct. 13, 2023), at <https://www.citizenshipworks.org/Campaign/nys-ona>.

¹⁶ New York State Council on Developmental Disabilities. “TechknowledgeMe.” (accessed Oct. 13, 2023), at <https://cdd.ny.gov/techknowledgeme>.

¹⁷ *Id.*, “Accessible Information and Plain Language Training.” (accessed Oct. 13, 2023), at <https://cdd.ny.gov/accessible-information-and-plain-language-training>.

¹⁸ *Id.* “Digital Equity for People with Developmental Disabilities.” (accessed Oct. 13, 2023), at <https://ddpc.ny.gov/system/files/documents/2023/02/digital-equity-policy-paper-final-2.15.23.pdf>.

- Support and expand resources to provide digital literacy training for people with developmental disabilities.
- Plan for the unique needs of people with disabilities as part of infrastructure planning.
- Consider the unique needs of people with developmental disabilities, their families and service providers, especially in rural and underserved communities.

The DETF Accessibility of Government Services subcommittee prioritized the following activities as they pertain to the outcome area:

- State investment towards ensuring all government service websites operate on user-friendly and ADA-compliant platforms and include interactive videos and multilingual support. Investment should include funding mechanisms to audit and update sites regularly and to provide 24/7 customer and technical support.
- Incorporate tailored digital literacy trainings into public computing center programming such as libraries' existing Digital Navigator programs to address the specific needs of populations like aging individuals, individuals with disabilities, individuals with language barriers, formerly incarcerated individuals, and veterans.
- Encourage ongoing collaboration between private organizations, Community Anchor Institutions, and government agencies to strategize outreach campaigns targeted towards specific populations to increase awareness of available resources.

2.4 Strategy and Objectives

2.4.1 Theory of Change, Strategies and Sample Activities

New York's State Digital Equity Plan and ConnectALL's programs are grounded in a theory of change which informs the State's strategies and objectives in alignment with the vision and principles detailed earlier in this chapter.

The mission of ConnectALL is to build New York State's digital infrastructure to connect all New Yorkers to internet service and ensure they can benefit from the opportunities afforded by being online. Under the bipartisan infrastructure law and Governor Hochul's prioritization of broadband and digital equity issues following the WIRED Broadband Act, ConnectALL may take action to "assist in ending the digital divide, supporting a more robust and competitive internet marketplace, and carrying out other actions to ensure universal access to high-speed, reliable and affordable broadband."¹⁹

¹⁹ See *WIRED Broadband Act*, at https://www.nysenate.gov/legislation/laws/UDA/16-GG*2.

ConnectALL’s efforts also benefit from New York’s digital equity ecosystem, anchored in nearly every region of the state by Digital Equity Coalitions that coordinate efforts across government, nonprofit, private, and education sector.²⁰

The authority granted to ConnectALL and the ecosystem ConnectALL will build on are immense assets in the effort to end the digital divide in New York, but the digital equity needs New Yorkers shared through our planning process are also significant (see **Chapter 3.2 Needs Assessment**). Without knowing how much will be allocated to New York through the Digital Equity Capacity Grant Program, ConnectALL will make at least \$50 million in digital equity investments—a sum that must stretch across the geography of the entire state, 20 million residents, and over five years. The timeline is particularly challenging given that the federal and State funds are one-time commitments, whereas the digital divide is ever evolving. Just as connectivity technologies become ubiquitous and obsolete, so too do certain devices, digital literacy and capacities, and cybersecurity protocols and privacy needs.

For these reasons, ConnectALL’s theory of change is driven by the need to identify multipliers to amplify and sustain financial investments, especially upstream and downstream from the physical infrastructure built via BEAD, the Department of Treasury Capital Projects Fund, and State investments. The sample activities proposed in **Chapter 5.0 Implementation** each correspond to the following multiplier strategies as examples; ConnectALL will pursue activities in line with the strategic pillars detailed below, consistent with the conditions, principles, and vision described in this chapter.

- **Grounding Investments in an Asset-Based Approach**

- Rather than starting from deficits, ConnectALL will build the capacity of community-rooted and trusted digital equity organizations over the long term.
- ConnectALL will do this by filling gaps, strengthening, and scaling what is working well across existing assets, creating new assets only where necessary. ConnectALL will also make structural changes to increase access to these assets.

ConnectALL will explore methods to execute this strategy including:

- **Invest in physical and digital accessibility across New York’s public library system.** As highlighted throughout this plan, libraries are a key partner in the fight to close the digital divide; buildings and websites should be accessible to all Covered Populations for ConnectALL to effectively partner, identify, and scale programs as part of the Capacity Grant Program.
- **Consider allocating a portion of capacity grant resources toward the creation of a participatorily budgeted and governed fund** so local digital equity and lived experts

²⁰ Additional data demonstrating the depth and breadth of this ecosystem is presented in **Chapter 3.1 Asset Inventory**. For more information on how ConnectALL has collaborated with regional coalitions, see **Chapter 4.0 Stakeholder Engagement**.

can steward funding. This will also support Strategy 3, by solidifying opportunities to build ongoing trust between ConnectALL and the public.

- **Strengthening networks to share resources and take coordinated action**
 - ConnectALL will invest in ensuring that digital equity organizations and service providers and the communities they serve are independently connected, collaborating, and sharing knowledge, which will ensure the long-term sustainability of digital equity efforts beyond the life of the federal funding currently available.
 - Organizations, service providers, and community members in organized networks will power civic engagement on digital equity issues (and, ideally, on a suite of social issues) in New York. Advocacy, community organizing, and campaigns are strengthened by the ability to identify points of solidarity, mobilize collective action, and increase participation in democratic processes—both online and offline.

ConnectALL will explore methods to execute this strategy including:

- **Continuing to support the capacity and sustainability of regional DECs.** ConnectALL aims to ensure coalition longevity and growth as key anchors in the state’s ecosystem, as by facilitating knowledge-sharing and partnership among coalitions and convening them semi-frequently to strengthen their connections.
- **Integrating alternative approaches into the traditional digital equity toolkit or transitioning existing models where appropriate, including base-building, community-organizing, and community ownership and stewardship models.** These approaches can serve as a launchpad for communities to self-determine their internet and infrastructure futures. This supports Strategies 3 and 4 by promoting wider public education across digital equity issues, potentially generating novel approaches to ending the digital divide, respectively.
- **Building Alignment & Awareness:**
 - ConnectALL will organize expertise and resources across the field and government (at the State, regional, county, and municipal levels) to advance digital equity policy innovation and standard setting across social programs.
 - ConnectALL will also promote standout programs to the public to broaden awareness and adoption of best practices; inherent in this effort is the need to build, deepen, and in some cases repair trust between government and the communities it serves.
 - By aligning government behind the field and making government efforts more known to the public, ConnectALL should create a virtuous circle so best practices identified through an asset-based approach are mutually reinforced by stakeholders for greater impact.

ConnectALL will explore methods to execute this strategy including:

- **Further developing the Digital Equity Task Force (DETF) infrastructure,** which was crucial during the ConnectALL planning process. DETF brings to bear a diversity of

expertise—from government and digital equity practitioners and experts across the state who serve covered populations—on digital equity issues; expanding the mission to include implementation, policy development, and performance measurement functions going forward will continue to amplify ConnectALL’s reach and impact.

- **Creating and maintaining a publicly available online asset inventory that functions as a statewide digital equity services directory.** This furthers Strategies 2 and 4, by cataloguing unconventional programs and services under a digital equity umbrella and elevating best practices in a transparent and accessible format.
- **Coordinating public education campaigns across** digital equity issues critical to ConnectALL achieving its mission, to complement grassroots campaigns of Strategy 2.
- **Sharpening & Socializing our Digital Equity Lens**
 - ConnectALL will incubate new approaches to persistent challenges, measure its impact, and publish findings.

ConnectALL will explore methods to execute this strategy including:

- **Creating and resourcing communities of practice across outcome areas to facilitate joint problem solving and participatory program design.** These structures would support ConnectALL’s grants management and communications efforts through the implementation process and further Strategy 2 by building another kind of network of engaged stakeholders.
- **Releasing data ConnectALL collects publicly as mechanism for transparency and accountability,** supporting Strategies 2 and 3 so communities may independently understand and act on the data, respectively.

Together, these strategic pillars enable ConnectALL to prioritize and streamline activities, even as one-time funding is deployed. This theory of change is also responsive to the goals that stakeholders communicated during ConnectALL’s planning process, including:

- Supporting existing organizations that have built trust with communities and Covered Populations.
- Building the capacity of these organizations and the people they serve to design their own solutions to promote digital equity.
- Coordinating existing resources and efforts in government to build strategic redundancies and ensuring those best situated to solve a certain dimension of the digital divide can embrace their strategic advantages.

- Continuing to innovate, which is required to bridge the digital divide in New York once and for all.

2.4.2 The Five Measurable Objectives

ConnectALL expects to achieve the following measurable objectives to realize New York’s vision for digital equity and will track progress through implementation (see **Chapter 5. Implementation**). The baseline needs from which these objectives are derived is presented in **Chapter 3.2.3 Digital Equity Needs, Barriers, and Assets Gap Analysis**. The baseline metric, a quantifiable unit by which ConnectALL will measure progress on the objectives below and over time to sustain New York State’s digital equity ecosystem, is detailed at **5.3 Implementation Strategy: Assets as Metric**.

1. **Broadband Affordability & Availability**

- **Increase the number of households statewide with broadband internet connections at home**, especially households living in subsidized affordable housing and rural households. Covered Populations, especially in low-income and rural communities, report lower rates of access to broadband internet connection. Successful rollout of ConnectALL’s Affordable Housing Connectivity and Rural Broadband Grant Programs will provide infrastructure connectivity, and partnerships with Digital Equity providers can improve adoption rates.
- **Increase share of locations in each region with more than one Internet Service Provider (ISP) option**. New Yorkers are concerned about a lack of choice among ISPs leading to lower quality of service at higher prices. By prioritizing consumer choice both in ConnectALL’s infrastructure and digital equity investments (through expanding existing public access networks and supporting consumer education campaigns to increase the visibility and transparency of bundled service terms), all New Yorkers can benefit from greater internet affordability and more transparent and predictable pricing.
- **Increase share of locations in each region with options for unbundled, affordable broadband service**. ConnectALL identified service bundling as a challenge for consumers seeking to minimize the cost of broadband service. ConnectALL will work through its various grant programs to increase the number of households that can purchase unbundled broadband service, lower the cost of high-speed internet service (symmetric one gigabit per second),²¹ and lower the average cost of internet service in

²¹ A symmetric one gigabit per second threshold was established in the NYS BEAD 5-Year Action Plan as part of BEAD primary criteria (NYS ConnectALL Office. “Five-Year Action Plan Broadband Equity, Access, and Deployment (BEAD) Program.” NYS Empire State Development. 2023.) and the New York State Wired Act (Webb. S.B. S5165. New York State Senate, at <https://www.nysenate.gov/legislation/bills/2023/S5165>).

each region or county.²² As part of its BEAD middle-class affordability plan, ConnectALL will require prospective subgrantees to offer at least one unbundled broadband product with a transparent price (i.e., no hidden fees) and certify that it will continue to provide this option to middle-income households for six years.

- **Increase adoption of affordability programs.** Many eligible New Yorkers are not aware of the ACP subsidy, and some New Yorkers who are aware of the subsidy cannot or do not use it. By investing in proven models to expand ACP outreach and supporting public education and awareness campaigns so consumers better understand the ACP program, ConnectALL expects to continue to increase New York's nation-leading ACP enrollment. ConnectALL will also continue to ensure all ISP grantees provide affordable service options in every region of the state.

2. **Accessibility of Devices & Device Support**

- **Increase the number of New York households that have internet-enabled devices at home.** New Yorkers belonging to covered populations struggle to afford internet-enabled devices at home—particularly those with specific needs like assistive technology or non-English language services. ConnectALL can reduce the device gap in New York by scaling successful existing device donation, refurbishment, lending, and ownership programs, and partnering with government and non-governmental entities on raising awareness about these programs and creating effective distribution channels.
- **Increase access to assistive technology** to meet the needs of people with disabilities.
- **Decrease the number of New Yorkers reporting challenges maintaining or troubleshooting their own devices.** New Yorkers that already have devices or participate in programs to procure them lack the technical support needed to maintain and troubleshoot them. ConnectALL can increase the number of people who have the skills to provide technical support, especially among communities that report challenges with maintenance. This approach can benefit those individuals with potentially employable technical skills and benefit those communities that need readier access to technical support. In December 2022, Governor Hochul signed the Digital Fair Repair Act into law granting consumers and technicians new rights to obtain parts and information from original equipment manufacturers to be able to independently repair their own devices.²³ The law, which went into effect in July 2023, will further lower barriers for device repair and maintenance for all New Yorkers.
- **Increase options for proper device disposal, recycling, and refurbishment.** Ongoing equipment refresh is an essential component of digital equity. As ConnectALL expands New York households with internet-enabled devices at home, there will be a

²² New York State Public Service Commission. “2022 Report on the Availability, Reliability and Cost of High-Speed Broadband Services in New York State.” NYS Broadband Assessment Program. 2022, at <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7B94520887-43D6-45D4-B140-A5CF72CBF708%7D>.

²³ New York State Office of the Governor. “Governor Hochul Signs the Digital Fair Repair Act Into Law,” Dec. 29, 2022, at <https://www.governor.ny.gov/news/governor-hochul-signs-digital-fair-repair-act-law>.

corresponding need to educate households on the right time to upgrade and to connect them to device disposal options that protect their privacy and the environment. There will also be an ongoing opportunity to refurbish and redistribute usable equipment.

3. Digital Literacy

- **Increase New Yorkers’ awareness of available digital literacy programs.** Covered populations—especially aging individuals, incarcerated individuals, low-income households, individuals with language barriers, and individuals with disabilities report lower confidence in overall digital literacy than average New Yorkers. Where programs already exist to meet the needs of these populations, ConnectALL will build awareness through partnerships with trusted messengers for specific populations.
- **Increase covered populations’ access to digital literacy programming aligned to their specific needs and interests.** ConnectALL can build capacity to meet the specific needs of covered populations in each region where such programs are not currently available. ConnectALL can scale capacity of existing programs that are aligned to local needs and interests but are not currently able to meet demand. ConnectALL can increase the accessibility of key facilities where trainings are offered and facilitate access to relevant resources and assets in other regions or nationally.
- **Increase coordination among training providers.** During the ConnectALL planning process, providers of digital literacy programs frequently raised a lack of consistent curricula and training standards that align with industry standards as barriers to effectively scaling their work. By strengthening alignment on these issues, ConnectALL can smooth the delivery and ensure the impact of digital literacy programs for New Yorkers that need them. ConnectALL will facilitate collaboration among providers to achieve consistent and industry-aligned training standards for skills programs across the state, particularly for youth education, workforce, or small business audiences. ConnectALL will deepen coordination within regions so training providers better serve Covered Populations and refer to assets aligned with evolving needs and interests — for example, as people progress through education and into the workforce.

4. Privacy & Cybersecurity

- **Increase the number of assets providing privacy & cybersecurity training to New Yorkers,** especially to members of covered populations like individuals with disabilities, individual with language barriers, racial and ethnic minorities, and youth. Covered Populations reported almost universal concern over stolen data, scams, and surveillance. The Asset Inventory suggests a need to scale existing and develop new approaches to delivering content tailored to Covered Populations.

5. Accessibility & Inclusivity of Public Resources

- **Collaborate on universal accessibility standards across State government websites.** Covered Populations report lower confidence in accessing online public

resources than average New Yorkers, which is especially problematic as many are eligible for and in need of public benefits. Through the DETF, State agencies can coordinate and marshal resources to achieve better accessibility outcomes for online resources. ConnectALL will work with partners to improve the confidence covered populations feel in accessing online public resources, as by engaging members of those populations in the design of those online services and by making public websites more consistent for the people they are intended to serve.

- **Develop outreach campaigns to increase covered populations' trust in online public resources.** Covered populations are less likely than other groups to interact with online government resources—less because of a lack of awareness or ability, and more due to a lack of trust in the accuracy and safety of these systems—based on data collected by ConnectALL during the planning process. ConnectALL can promote greater online participation in essential government services by building trust in these systems via outreach activities and by developing meaningful processes to gather continuous feedback from users in the community.

2.4.3 Coordination of Funding

The ConnectALL Office is the single, consolidated division responsible for Digital Equity, BEAD, and other broadband funding programs. Personnel within ConnectALL who are responsible for implementing the Digital Equity and BEAD grants meet daily and report to the same person who is the AOR for both grants. Digital Equity personnel participate in program design and will review each ConnectALL project for Digital Equity coordination. ConnectALL utilizes a cross-program data team for shared analysis and staff have precedence supporting other grant programs to coordinate both federal and state funding opportunities. In addition, ConnectALL coordinates implementation of infrastructure investments and digital equity capacity building in the field through regional partners, including the regional planning boards and digital equity coalitions.

3.0

State of Digital Equity in New York

3.0 State of Digital Equity in New York

Due to the passage of the Digital Equity Act (DEA) of 2021, states are taking on a central role in both collecting vital data on digital equity and creating infrastructure and policy to advance digital equity goals. Building from the baseline of the U.S. Census Bureau's American Community Survey (ACS), which provides nationwide information about home broadband and device adoption, the DEA provides states with the opportunity to build a new and expanded baseline regarding the needs of specific covered populations, as well as a range of digital inclusion activities that can address those needs.

This chapter offers the resulting evidence base, which will inform effective policy and long-term solutions to build and advance digital equity over the next half-decade. The chapter begins with the **asset inventory**: an organized database to categorize and understand the wealth of community resources, knowledge, and expertise that are already advancing digital equity in New York State. Such an approach is inherently solution-oriented and recognizes that solutions already exist that can be strengthened and further expanded with a firm foundation. It is also the evolving set of quantifiable units for tracking all progress (see 3.1 Asset Inventory).

The comprehensive **needs assessment** follows: a catalog of the needs and barriers to meaningful internet adoption expressed by populations that have been historically left out of digital advancement.

To develop the asset inventory and needs assessment, ConnectALL partnered with regional entities, including Digital Equity Coalitions (DECs) and their partners who hold relationships with covered populations across the state. ConnectALL has used the asset inventory and needs assessment in combination to analyze New York's ecosystem, identify gaps, and ultimately to align efforts towards an empirically defined digital equity roadmap, which is described in **Chapter 5.0 Implementation**.

3.1 Asset Inventory

ConnectALL will use the Digital Equity Asset Inventory, generated through the statewide planning process in partnership with community organizations, community anchor institutions, and other stakeholders, to benchmark progress towards addressing the digital divide, from baseline to measurable objective (as the five broad objectives described above), and reflecting proposed activities in this Plan. The state has a current inventory of 964 digital equity assets. These assets include programs related to digital literacy training, including workforce development and basic skills programs; technical assistance programs aimed at supporting digital inclusion; and partnerships and coalitions that work toward digital equity, for example.

This inventory of 964 assets represents the measure of baseline capacity for New York. ConnectALL has established five- and ten-year benchmarks to orient towards sustained growth beyond the one-time infusion of federal funds. ConnectALL's preliminary determination is to

scale in proportion to the current inventory and set measurable objectives for each focus area, covered population, and region accordingly. ConnectALL may refine these objectives or prioritize some in time based on the opportunity for faster growth within certain categories. Notwithstanding these refinements, ConnectALL will remain committed to the long-term objective of doubling the capacity of the Digital Equity ecosystem in New York.

ConnectALL will supplement the measurement and tracking of assets with ConnectALL's formative and summative evaluation through the first five-years as described in at **5.2 Implementation: Evaluation** to assess the impact and effectiveness of individual assets.

ConnectALL will utilize Capacity Grant funds in year one to develop a typology and comparison across assets to inform additional measurable objectives. ConnectALL will also periodically update the statewide assessment of internet adoption, use, and barriers as a broad indicator of outcomes. ConnectALL is committed to improving these broad indicators but does not expect to set granular targets based on these indicators because of the number of other factors involved in determining those conditions in a state as large and dynamic as New York. (See **5.3 Implementation Strategy: Assets as Metrics** for a full description of the asset inventory and how it will be used for this purpose).

3.1.1 Digital Inclusion Assets by Covered Population

The [New York State Digital Equity Asset Inventory](#) catalogs assets that advance broadband accessibility and affordability, accessibility of devices and device support, digital literacy, online privacy and cybersecurity, and the accessibility and inclusivity of public resources, as well as the State outcome areas, for covered populations that face disproportionate barriers to digital equity and inclusion. (See **5.3 Implementation Strategy: Assets as Metric, Table 1** in Appendices for further detail). ConnectALL has organized assets according to NTIA's five measurable objective categories, per guidance from its Asset Mapping Guide: "Asset mapping information should be organized into sections and fields according to common types of digital equity work."²⁴

1. Broadband Affordability & Availability
2. Accessibility of Devices & Device Support
3. Digital Literacy
4. Privacy & Cybersecurity
5. Accessibility & Inclusivity of Public Resources

Within each, ConnectALL sampled representative assets to collectively meet these criteria:

1. Service to all covered populations.
2. Inclusion of example "network assets" that operate statewide or across regions (e.g., schools, libraries, non-governmental organizations, etc.)

²⁴ NTIA. "Asset Mapping Guide: Data Equity Gathering Best Practices." Sep. 2022, at https://broadbandusa.ntia.doc.gov/sites/default/files/2022-09/Asset_Mapping_Guide.pdf.

3. “Innovative or portable assets” that operate pilots or mature programs worthy of scaling with more funding.

3.1.1.1 Assets Advancing Broadband Affordability & Availability

These assets advance broadband affordability and availability across the state by investing in infrastructure and internet access in buildings, delivering high-speed wireless internet in publicly accessible spaces, advocating for equitable broadband investment.

Unique assets operate in different regions across the state and meet the needs of specific covered populations. Some of these assets are sampled in *SDEP Appendices*: the Adirondack North Country Association, Albany Housing Authority, Allegany County Telecommunications Development Corporation, Big Apple Connect, Bridgehampton Child Care and Recreational Center, City of Syracuse, Claryville Volunteer Fire Department, Community Development Corporation of Long Island, General Business Course at Elmira Correctional Facility, Great Lakes Connect, LinkNYC, Mohawk Valley Resource Center for Refugees, New York State Association for Affordable Housing (NYSFAFH), North Country Broadband Alliance, Nubian Directions II, Silicon Harlem, STEM Alliance, Sunset Park Digital Inclusion Group, Tioga County Rural Ministry, and Westhab.

In addition, networks of assets deliver similar broadband affordability and availability services across multiple regions or the entire state. A sample of networked assets is summarized below:

- **Boards of Cooperative Educational Services (BOCES).** 37 BOCES provide shared, cost-effective educational programs and services to school districts within the state outside of the largest urban areas New York City, Buffalo, Rochester, Yonkers, and Syracuse.²⁵ BOCES generally provide free internet access on premises, free access to online subscription services, group classes and workshops on digital literacy and cybersecurity, individual assistance on digital literacy and cybersecurity, access to devices on premises, and device loans.
- **Community Action Agencies (CAA).** CAAs are local nonprofit organizations that deliver Community Action Program (CAP) services that broaden communities’ access to public services, such as the Affordable Connectivity Program (ACP), Low-Income Home Energy Assistance (LIHEAP) grants, and Weatherization Assistance Program (WAP) grants and case management.
- **Community centers.** Community centers—such as YMCAs, YWCAs, Boys & Girls Clubs—commonly provide access to high-speed internet on premises within communities where residents have low rates of reliable connectivity at home.
- **Universities.** Institutions of higher education—including City University of New York (CUNY) and State University of New York (SUNY)—campuses and programs extend access to broadband internet to students, workers, and members of the community.

²⁵ Boards of Cooperative Educational Services. “About BOCES,” at <https://www.boces.org/about-boces/>.

- **Libraries.** Over 260 public libraries, operating within regional and statewide library networks, facilitate access to high-speed wired and wireless internet across the state. These libraries also serve as centers for accessing digital devices and digital literacy programming, as discussed below.
- **United Way.** United Way organizations across the state have funded digital equity studies and reports as well as pilots and projects that extend access to broadband to covered populations.

3.1.1.2 Assets Advancing Accessibility of Devices & Device Support

These assets provide access to internet-enabled devices or technical device support across the state. Many assets that lend or provide devices pair device access programs with training and digital literacy programming to ensure beneficiaries can make the most of the devices they have are using for work, school, or other purposes.

Unique assets operate in different regions across the state and meet the needs of specific covered populations. Some of these assets are sampled in *SDEP Appendices: AccessCNY*, Bronx Community Foundation, Healthy Communities Alliance, Livingston County Workforce Development Office, Mission: Ignite, Mohawk Valley Community College, New York City Housing Authority (NYCHA), OLA of Eastern Long Island, On Point for College, Ontario County Youth Court, Open Doors English, RSVP Suffolk, SAGE USA , Shift2, Southern Adirondack Independent Living, Suffolk Regional Information Center, Syracuse Northeast Community Center, Technology for Families in Need, and the Shore Foundation.

In addition, networks of assets deliver devices and device support across multiple regions or the entire state. A sample of networked assets is summarized below:

- **Libraries:** At least 240 of these assets are public libraries, which allow access to connected devices on their premises. Some library systems offer loan programs that lend laptops and Wi-Fi hotspots and feature assistive technology on premises, which increases the accessibility of websites for individuals with disabilities.
- **NYC Public Computing Centers (PCCs):** A public computing center (PCC) is a public facility offering computers with internet access, and it may also offer other devices, services, and digital literacy programming. A PCC may be funded in whole, or in part, with public dollars to provide a public service (i.e., access to digital inclusion resources). There are 455 PCCs in New York City, which are overseen by six separate entities: the three public library systems, Brooklyn Public Library (BPL), New York Public Library (NYPL), and Queens Public Library (QPL); and three City agencies, New York City Department for the Aging (DFTA), New York City Department of Parks & Recreation (NYC Parks), and New York City Department of Youth & Community Development (DYCD).

3.1.1.3 Assets Advancing Digital Literacy

Most assets in the state deliver digital literacy programming to the public or deliver programming adapted for and targeted to specific covered populations. Some of this programming covers topics related to online privacy and cybersecurity, which is covered separately below.

Unique assets operate in different regions across the state and meet the needs of specific covered populations. Some of these assets are sampled in *SDEP Appendices*: ATTAIN, CanCode Communities, Center for Community Alternatives, Center for Self Advocacy, City of Long Beach, Cornell Cooperative Extension- Orleans County, DOROT, First Tech Fund, Inc, Goodwill of the Finger Lakes, Green Worker Cooperatives, Knowledge House, Lifting Up Westchester, Literacy CNY, Make the Road New York, Older Adults Technology Services (OATS), Inc., Schoharie Economic Enterprise Corp (SEEC), Suffolk County Sheriff START Center, and the Yates County Office of Aging.

In addition, networks of assets deliver devices and digital literacy programming across multiple regions or the entire state. A sample of networked assets is summarized below:

- **Boards of Cooperative Educational Services.** 37 BOCES provide shared, cost-effective educational programs and services to school districts—serving K-12 school students as well as adults seeking GEDs and high-school equivalency courses—outside of the largest urban areas New York City, Buffalo, Rochester, Yonkers, and Syracuse.²⁶ These resources include group classes and workshops on digital literacy and cybersecurity and individual-level assistance on digital literacy and cybersecurity.
- **County Offices for/of Aging.** County Offices for/of Aging—e.g., Broome County, Tompkins County, Yates County—provide digital literacy programming adapted for the needs of aging individuals, often delivered in partnership with local digital equity institutions.
- **Libraries.** Over 300 libraries statewide deliver digital literacy courses and materials to the public on a regional and local level. A given library network serving a given county or region tends to offer standardized programming across the network.
- **New York City Office of Technology & Innovation’s (OTI) Connected Communities Initiative** provides digital literacy and employment resources to historically underserved areas, serving thousands of New Yorkers annually. NYC Connected Communities delivers devices, software, mobile hotspots, and over 24,000 hours annually of digital literacy programming to over 100 public sites. The initiative includes partnerships with NYC Parks, the Department for the Aging (DFTA), the New York City Housing Authority (NYCHA), and the city’s three library systems.²⁷

²⁶ *Id.*, “About BOCES,” at <https://www.boces.org/about-boces/>.

²⁷ New York City Office of Technology & Innovation. “Services for New Yorkers: Broadband.” 2023. <https://www.nyc.gov/content/oti/pages/broadband>.

- **Regional/County Offices of Workforce Development.** Offices of workforce development deliver digital literacy training adapted to prepare youth and adults for employment in professions requiring technical computer and internet use skills.

3.1.1.4 Assets Advancing Privacy & Cybersecurity

These assets deliver programming and resources that focus on cybersecurity and safe and private use of the internet. Although a smaller share of assets explicitly focusses on helping New Yorkers maintain their Privacy & Cybersecurity on the internet, much of the digital literacy programming summarized above—offered by libraries, workforce development offices, BOCES and schools, and other institutions—does include content on safe and secure internet usage.

Unique assets operate in different regions across the state and meet the needs of specific covered populations. Some of these assets are sampled in in *SDEP Appendices: AARP*, Boys and Girls Club of Rochester, EPIC (Every Person Influences Children), FEARLESS of the Hudson Valley, InterFaith Works, Knowb4, NY Metro InfraGard, and SUNY Cobleskill College of Agriculture and Technology.

3.1.1.5 Assets Advancing Accessibility & Inclusivity of Public Resources

These assets connect individuals to public resources and services online. They include libraries, community-based organizations, community centers and recreation centers, and advocacy organizations. Assets that specialize in expanding access to public resources online tend to focus on benefits enrollment—including ACP enrollment, healthcare benefits enrollment and navigation, and enrollment and participation in other means-tested programs (e.g., SNAP, LIHEAP, weatherization, etc.).

Unique assets operate in different regions across the state and meet the needs of specific covered populations. Some of these assets are sampled in *SDEP Appendices: Adirondack Health Institute*, Catholic Charities of Cortland County, Community Access, Inc., Computers 4 People, Exodus Transitional Community, Herkimer County Office for the Aging, Immigration Advocates Network, Older Adults Technology Services (OATS), New York State Developmental Disabilities Planning Council (DDPC), New York Statewide Senior Action Council, Rural Health Network of South Central NY, South Bronx Rising Together (SBRT), The Viscardi Center, Veterans Integration to Academic Leadership.

3.1.2 Existing Digital Equity Plans

The New York State Digital Equity Asset Inventory features 44 plans, resources, or reports that either provide data on some aspect of the digital divide in New York State or recommendations for bridging the digital divide and to increase equity. Plans were identified through the DECs. Reports have been authored by organizations including libraries, municipal governments, and nonprofits. Each author addresses a unique aspect of digital inequity in the state, focusing on distinct geographies or populations and providing a unique lens from the perspective of the authoring organization. Together, they produce a picture of the multifaceted

work that organizations across the state have been engaged in to define and address digital inequity.

Plan contents and recommendations are detailed in the Appendices below at **1.1.3 Existing Digital Equity Plans**; see for a description of each standalone local plan, report, and study that ConnectALL reviewed and considered in preparation of the Plan (**pages 154 - 165**).

Given the complexity and scale of the State's geographies, populations, economies, and digital equity networks, no single document was adopted, integrated or prioritized. To be comprehensive, ConnectALL synthesized data and recommendations that informed the generation of its four key digital equity strategies, affirmed the depth of the digital divide among Covered Populations for remedy, and corroborated recommendations sourced through listening sessions, focus groups, coalitions, and public forums. Analysis provided overarching guidance for the proposed activities and outcomes of this evolving plan.

3.1.2.1 Federal and New York State Plans, Resources, and Reports

- "ACP Enrollment and Claims Tracker." Universal Service Administrative Company. (2023)
- "Audit: New NY Broadband Program." NY State Comptroller. (2022)
- "Indicators of Broadband Need." United States Department of Commerce, National Telecommunications and Information Administration (NTIA). (2020)
- "New York State Digital Equity Portal Final Report." New York State Education Department, Cornell University School of Industrial and Labor Relations (ILR), John R. Oishei Foundation, Central New York Digital Inclusion Coalition, Community Tech New York (CTNY), New York Public Library. (2021)
- "New York State Public Service Commission (PSC) Broadband Map." New York State Public Service Commission. (2023)
- "Report On the State of Broadband Access in New York's 22nd Congressional District." 22nd Congressional District. (2020)
- "Report: Making Strides on Broadband Affordability." NY State Comptroller. (2023)
- "Report: Understanding Broadband Challenges in New York State." NY State Comptroller. (2021)
- "The Digital Divide in New York State." New York State Council on Children and Families, New York Kids Count. (2022)

3.1.2.2 County and Municipal Plans, Resources, and Reports

- "Broome County Office for Aging Plan for Services 2022-2023." Broome County Office for the Aging. (2021)
- "Community Access Plan and Funding Strategy for Broadband." Monroe County. (2023)
- "Community Needs Survey for Steuben County Office for the Aging 2022." Steuben County Office for the Aging. (2022)

- "Tompkins County Office for the Aging Needs Assessment, Summary Report." Tompkins County Office for the Aging. (2019)

3.1.2.3 Libraries and Schools Plans, Resources, and Reports

- "2022 Digital Inclusion Toolkit." New York State Library. (2022)
- "Achieving Digital Equity in New York: An Outline for Collaborative Change." New York State Library. (2021)
- "Annual Statistical Report of Member Libraries - STLS." Southern Tier Library System. (2022)
- "Creating Healthy Digital Equity Ecosystems in NYC: Maximizing the Benefits of the Internet Master Plan." Columbia School of International and Public Affairs (SIPA). (2021)
- "Digital Divide Index." Purdue Center for Regional Development. (2021)
- "East New York's Digital Access Needs." Brooklyn Public Library (BPL). (2017)
- "Leverage Libraries to Achieve Digital Equity for All." American Library Association. (2022)
- "New York's Digital Divide: Examining adoption of internet and computers for the state and its library districts." Technology Policy Institute, New York Public Library. (2021)
- "NYS ARPA digital equity program/awards." New York State Library (NYSL). (2022)

3.1.2.4 Resources by Nonprofits, Philanthropies, and Community Based Organizations

- "Child & Family Well-being in New York State: Addressing Barriers to More Equitable Opportunities." Citizens' Committee for Children of New York. (2023)
- "Closing the Digital Skills Divide." National Skills Coalition. (2023)
- "Closing the Latino Digital Divide." Hispanic Federation. (2022)
- "Connecting Rural Older Americans with Technology: Lessons from Senior Planet." Older Adults Technology Services (OATS), Inc. (2020)
- "Digital Equity Roadmap." John R. Oishei Foundation, Community Tech New York (CTNY). (2021)
- "Digital Navigators of the Hudson Valley." Digital Navigators of the Hudson Valley. (2023)
- "Fly Like an Eagle: Measuring Transformational Social Outcomes Among Seniors Using Technology." Older Adults Technology Services (OATS), Inc. (2022)
- "Homeless Need Internet Access to Find a Home." City Bar Justice Center's (CBJC) Legal Clinic for the Homeless (LCH). (2020)
- "Immigrant Health Care Options." Academy of Medical and Public Health Services.
- "Increasing Digital Inclusion for Older Adults in New York's North Country." Older Adults Technology Services (OATS), Inc. (2020)
- "Investing in Quality: A Blueprint for Adult Literacy Programs and Funders." Literacy Assistance Center. (2017)

- "No Home Left Offline: Accelerating Affordable Connectivity Program Adoption." Education Superhighway. (2022)
- "Orleans Digital Literacy Initiative Final Report." United Way of Orleans County. (2021)
- "Southern Tier Digital Equity Regional Needs Assessment." Southern Tier Digital Equity Coalition (STDEC). (2023)
- "Westchester County - 2022 Digital Access Survey and Report." Westchester Children's Association / Pace University. (2022)

3.1.3 Existing Digital Equity Programs Operated by New York State Government

New York State agencies, counties, and municipalities currently operate a variety of broadband and digital equity programs. DECs across the state have recorded 25 counties or specific county agencies doing work to bridge the digital divide for their communities. Similarly, the statewide Digital Equity Asset Inventory includes nine municipal governments and multiple planning and economic development agencies furthering this work. These public agencies are working to identify broadband and digital equity needs in their communities, develop strategies to connect constituents to existing federal and State resources, and plan for the deployment of new resources, including fiber and broadband infrastructure, to meet additional community needs. Other programs focused on the equitable delivery of physical broadband infrastructure are summarized in the BEAD Five-Year Action Plan.²⁸

As noted above, see **Appendices at 1.1.3 Existing Digital Equity Plans** for a description of each standalone local plan, report, and study that ConnectALL reviewed and considered in preparation of its State Digital Equity Plan. Given the complexity and scale of the State's geographies, populations, economies, and digital equity networks, no single document was adopted, integrated or prioritized. ConnectALL synthesized data and recommendations that informed the generation of its four key digital equity strategies, affirmed depth of the digital divide among covered populations for remedy, and corroborated recommendations sourced through listening sessions, focus groups, coalitions, and public forums. Analysis provided overarching guidance for the proposed activities and outcomes.

²⁸ New York State Empire State Development ConnectALL Office "Five-Year Action Plan Broadband Equity, Access, and Deployment (BEAD) Program," 2023, at <https://broadband.ny.gov/system/files/documents/2023/09/nys-bead-5-year-action-plan.pdf>.

Table 1: Current and Recent New York State Broadband Equity Activities

Activity name	Description	Intended outcome(s)
Statewide Digital Equity Plan and grant program	Development of the SDEP through a statewide data collection and community engagement process; implementation of a statewide grant program to fund programs that will support individuals to have the information technology capacity needed for full participation in society and the economy.	The SDEP reflects the needs and priorities of diverse communities across New York; all residents benefit from funded programs and can use the internet to participate in society, democracy and the economy.
ConnectALL Affordable Housing Connectivity Program	Funding to deploy high-speed broadband infrastructure to affordable housing properties and upgrade in-building wiring and equipment to support high-speed service to individual residential units.	Residents in affordable and public housing have access to affordable, reliable, high-speed internet.
ConnectALL Connectivity Innovation Grant Program	Grants, seed funding, and matching funds to develop, pilot, and deploy innovative models and technologies for the delivery of broadband service to meet the needs of rural, low-income, and other areas that would otherwise not see investment.	Deployment of innovative and new broadband solutions, business models, and technologies; increased private sector investment and entrepreneurship to drive equity and innovation in the broadband marketplace; a thriving research, development, and manufacturing ecosystem to support connectivity innovation in New York.
Affordable Connectivity	The Department of Public Service (DPS) leads an interagency promotional effort	Eligible New York households subscribe to the Affordable Connectivity Program at rates

Activity name	Description	Intended outcome(s)
Program public awareness	to increase awareness of, and enrollment in, the federal Affordable Connectivity Program.	as high as any state in the country.
New NY Broadband Program	Established in 2015, this precursor program to ConnectALL (administered by the Broadband Program Office) provided New York State grant funding to support projects that deliver high-speed internet access to unserved and underserved areas of the state.	Approximately 90% of program funds addressed areas without any terrestrial high-speed broadband option, connecting these locations for the first time. New NY resulted in the deployment of over 21,000 miles of fiber optic cable and supported over 120 individual projects with 32 different companies, the majority (56%) of which were either family-owned or nonprofit cooperatives.

Central to digital equity ecosystems across the state, digital equity coalitions work to coordinate and amplify efforts and build advocacy power between organizations with a stake in increasing equitable internet access, whether or not digital equity is core to their mission. Below are 12 coalitions actively operating across the state. More information on each coalition can be found here: <https://bit.ly/NYS-DE-Asset-Inventory-Coalitions>.

Table 2: Digital Equity Coalitions

Region(s)	Organization
Capital Region	Capital Region Digital Equity Coalition
Central New York	Central New York Digital Inclusion Coalition
Finger Lakes	Finger Lakes Digital Inclusion Coalition
Long Island	Long Island Digital Inclusion Coalition
Long Island, Capital Region, Central New York, Finger Lakes, North Country, Southern Tier, Mid-Hudson, Western New York	New York State Digital Equity Network
New York City	New York City Alliance for Digital Equity
New York City	Sunset Park Digital Inclusion Group
New York City	Queens Digital Inclusion Coalition
New York City	The Bronx Digital Equity Coalition
North Country	North Country Digital Inclusion Coalition
Southern Tier	Southern Tier Digital Equity Coalition
Western New York	Western New York Digital Equity Coalition

3.1.4 Broadband Access, Affordability, and Adoption Statewide

Information above and content in *SDEP Appendices* describe broadband access, affordability, and adoption assets statewide.

Chapter 3.2 Needs Assessment describes existing conditions in broadband adoption, the population of high-speed internet users estimated to engage in meaningful use, and existing conditions in broadband affordability.

3.1.5 Broadband Affordability

Chapter 3.2 Needs Assessment describes existing conditions in broadband affordability.

3.1.5.1 Affordable Connectivity Program (ACP) Uptake

The federal ACP subsidy helps lower the cost of broadband subscriptions for eligible low-income households. In part due to a 2022 multi-agency outreach effort as part of the ConnectALL initiative, New York became one of the leading states in the nation for ACP enrollment. 1,600,045 New York State households are enrolled in the ACP as of October, 2024²⁹ representing nearly half of the estimated number of households eligible in the state.³⁰

3.1.5.2 Efforts to Increase ACP Program Enrollment

New York State has led substantial outreach to increase ACP program enrollment. Sample efforts include:

- **Office of Temporary and Disability Assistance** directed social service agencies to share outreach materials with clients and contracted service providers and has conducted outreach through its social media channels.
- **Office of Children and Family Services** includes ACP information in newsletters and promotes the broadband subsidy through social media and local departments of social services, childcare providers and licensors, foster care and voluntary agencies, community multi-services offices, the statewide partnership for households of juvenile-justice-involved youth, runaway and homeless youth shelter operators, and domestic violence shelter operators.
- **Department of Motor Vehicles** broadcasts information about ACP on monitors in State-operated DMV offices in New York City, Long Island, and Albany, Westchester, Rockland, and Onondaga counties, and has mailed out mailing approximately five million informational inserts throughout the year along with drivers' licenses.
- **Office for the Aging** partnered with the **Department of Public Service** to provide materials to 59 county offices for use at meetings, picnics, health fairs, senior centers, social adult day sites, and naturally occurring retirement communities. They have also distributed a training recording to more than 1,200 community-based organizations and have released a public service announcement, e-newsletter, and social media assets.

²⁹ Universal Service Administrative Company, "ACP Enrollment and Claims Tracker," (last accessed Nov. 3, 2023), at https://www.google.com/search?q=%E2%80%99Cacp+enrollment+and+claims+tracker&rlz=1C1RXQR_enUS1035US1035&sourceid=chrome&ie=UTF-8.

³⁰ Institute for Local Self Reliance. "Affordable Connectivity Program Dashboard." (accessed Nov. 3, 2023), at <https://acpdashboard.com/>.

- **Digital Equity Working Group (DEWG)**, a precursor to the Digital Equity Task Force co-led by **ConnectALL** and **New York State Library**, brought together representatives from several State agencies to disseminate information about ACP to constituents via email, newsletters, social media, and other channels.
- **New York State Library’s Digital Equity Roundtables engaged nonprofit organizations, and public and school libraries in ACP outreach and enrollment.**
- **Empire State Development** shares information on ACP with Regional Economic Development Councils, the New York State Association of Counties, the Association of Towns, local Digital Equity Coalitions, and ConnectALL’s roster of ISPs.

Nonprofit and community-based organizations have made vital contributions to ACP enrollment. As demonstrated in the asset inventory, libraries consistently offer ACP enrollment support across their networks statewide. Certain organizations, namely community action agencies and organizations that support specific covered populations’ access to public services (e.g., veterans, individuals with disabilities, aging individuals, formerly incarcerated individuals), had ACP program signups as part of a suite of benefit eligibility support.

Under the Federal Communications Commission (FCC) Affordable Connectivity Outreach Grant Program (ACP Outreach Grant Program), 10 New York-based nonprofit organizations received competitive federal funding to facilitate the promotion and awareness of and participation in the Affordable Connectivity Program (ACP) among eligible households: Albany County Opportunity; City of Jamestown, NY; International Rescue Committee; Iris House; Journey’s End Refugee Services; Livingston County, NY; Mission: Ignite Powered by Computers for Children; National Urban League; New York Public Library, Astor, Lenox, and Tilden Foundations; NYS Community Action Association.

3.1.5.3 Other Broadband Affordability Programs

Internet Service Providers (ISPs) offer assistance programs to consumers with limited incomes.

- Additional ISP affordability and means-tested discount programs include the Spectrum Internet Assist Plan, RCN’s Internet First Program, Optimum Advantage Internet, Maxsip Telecom free service to ACP-qualifying households.
- The public and private sectors have collaborated to provide discounts or low-cost services to ACP-qualifying households. Examples include Big Apple Connect for New York City Housing Authority (NYCHA) developments, Hudson Valley Wireless in the Capital Region, and Connect Orleans in the Finger Lakes region.
- ConnectALL maintains an online database—the “affordable internet options database”—of internet providers that offer low-cost plans, searchable by county.³¹

³¹ ConnectALL Office. “Find Affordable Internet Options in NYS.” (accessed Oct. 13, 2023), at <https://broadband.ny.gov/find-affordable-internet-options-nys>.

3.2 Needs Assessment

While broadband and digital equity leaders and communities have long understood and have already been working to overcome familiar barriers to internet adoption and digital equity, this needs assessment is the first comprehensive, evenly distributed dataset for the entirety of New York State and includes new and important findings.

The needs assessment synthesizes survey and focus group data to develop an evidence-based understanding of needs and barriers to full adoption and internet use faced by those most impacted by digital inequity. Results demonstrate the needs for and barriers to realizing each NTIA measurable objective category—statewide and with respect to covered population (Chapter 3.2.1) and region (Chapter 3.2.2).

This introduction summarizes general existing conditions across the state by drawing on administrative data (U.S. Census American Community Survey, Federal Communications Commission data, and Census DEA Population Viewer data) as well as responses to the New York State Internet Access Survey. It uses the NTIA measurable objective categories as a framework for presenting findings statewide.

The New York State Internet Access Survey (referred to as “The Survey”) resulted in 5,781 responses. The covered populations accounting for the largest shares of responses were racial minorities (35%), aging individuals (24%), low-income households (13%) and rural inhabitants (13%). To address over or under sampling, this study weighted survey responses from the full response sample, and from each population subgroup, to better reflect overall US Census enumerated state population distribution. The methodology for survey distribution, data cleaning and weighting, and analysis is incorporated in **Chapter 7.0 Research Methodology**.

Broadband Affordability & Availability

According to the New York State Broadband Map, launched in 2022 and updated in June 2023, 97% of New York State address locations are served by high-speed broadband service, 0.1% are underserved, and 2.5% are unserved.³²

Service categories for New York’s Broadband map were defined by the State Legislature in the Comprehensive Broadband Connectivity Act (2021), which considers a served location to have at least two ISPs with one or more providers offering service of at least 100 Mbps download and at least 10 Mbps upload (100/10 Mbps). Underserved locations have fewer than two ISPs or have available internet download speeds of at least 25 Mbps but less than 100

³² NYS Public Service Commission. “New York State Broadband Map.” (accessed Aug. 2, 2023), at <https://mapmybroadband.dps.ny.gov/>.

Mbps. Unserved locations are locations where there are no fixed wireless service or internet speeds of 25 Mbps download or less are available.^{33,34}

A large majority of New Yorkers have broadband internet available at their homes, yet it is still not accessible to everyone, due to affordability barriers or a lack of internet-enabled devices at home.

While most locations are considered served according to the NYS Broadband Map, over 10% of New Yorkers do not subscribe to reliable broadband internet.

- Nearly 1 million New York households—13% of all households—lack access to broadband internet of any type per the U.S. Census Bureau American Community Survey (2017-2021). This percentage is in line with the national average of 13%.³⁵
- New York State Internet Access Survey results suggest a smaller proportion of New Yorkers—only 11%—lack access to broadband internet, which may in part reflect selection bias in the Survey and additional broadband investments made since the 2017-2021 five-year averaged ACS results.³⁶
- According to speed tests that respondents performed while completing the New York State Internet Access Survey, the median download and upload speed for New York State is 89/11 Mbps, which falls short of the FCC’s “served” standard at 100 Mbps for download speeds.³⁷

Covered populations are generally less likely to have access to broadband internet at home.

- Lower-income households were more likely to lack broadband access. According to U.S. Census data (2021), approximately 29% of households earning less than \$35,000 annually do not subscribe—compared to just 5% of households earning \$75,000 or more.³⁸
- Individuals with language barriers language ability were also significantly less likely to have broadband internet access, according to Survey results.

³³ The Act amended the Public Service Law (PSL) by adding a new §224-c; https://assembly.state.ny.us/leg/?default_fld=&leg_video=&bn=A06347&term=2021&Summary=Y&Text=Y.

³⁴ This definition is like the FCC’s definitions for served locations (speeds above 100/20 Mbps), underserved locations (speeds below 100/20 Mbps but above 25/3 Mbps), and unserved locations (speeds below 25/3 Mbps), but it specifies a different minimum upload speed for served locations and provides alternative guidance around using a minimum number of internet service providers to classify locations. Under the BEAD Program, any location with speeds of 100/20 by technology that meets the definition of Reliable Broadband Service is considered served; NTIA High-Speed Internet definition, at <https://www.ntia.gov/category/high-speed-internet>.

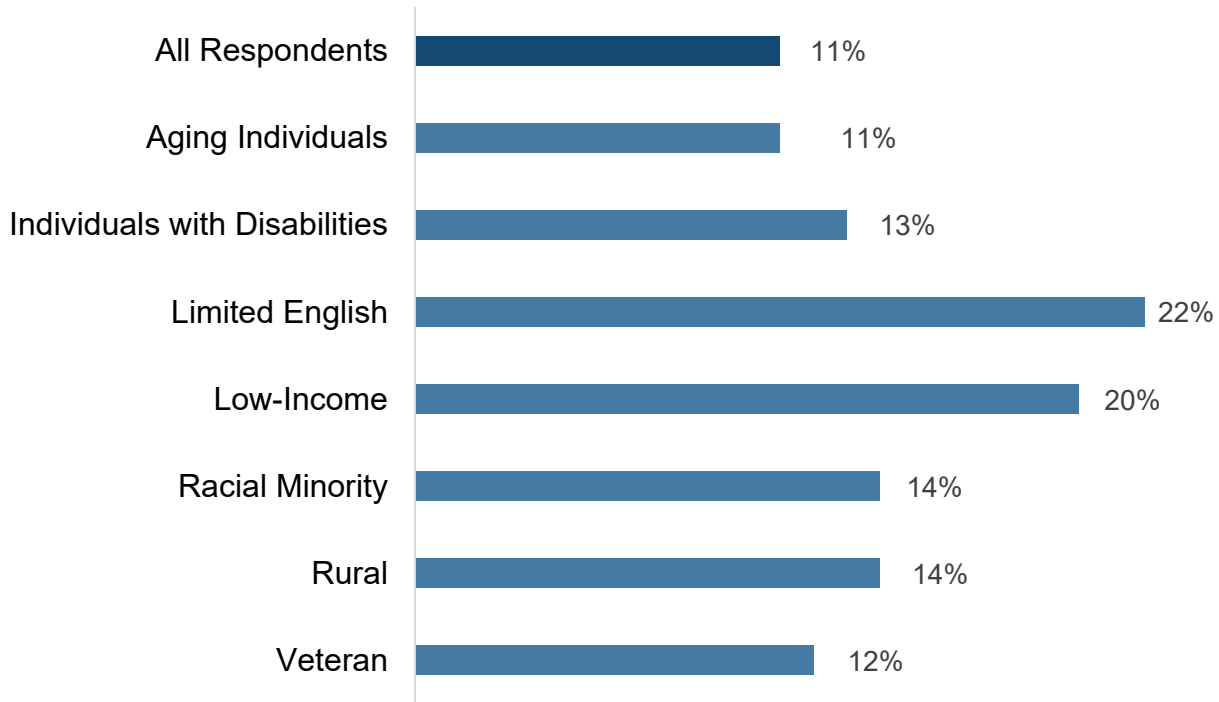
³⁵ American Community Survey Five-Year Estimates, 2017-2021; “S2801—Types Of Computers And Internet Subscriptions,” U.S. Census Bureau, <https://data.census.gov/table?t=Computer+and+Internet+Use&g=040XX00US36&tid=ACST5Y2021.S2801>. ACS refers to the following as broadband at home: cellular data plan, cable, fiber optic, satellite, or DSL.

³⁶ See **Chapter 7.2 Survey Data Analysis Methodology**.

³⁷ New York Internet Access Survey (2023).

³⁸ American Community Survey Five-Year Estimates, 2017-2021.

Figure 1: Percentages of Respondents Who Do Not Have Broadband Internet at Home, Statewide and by Covered Population³⁹

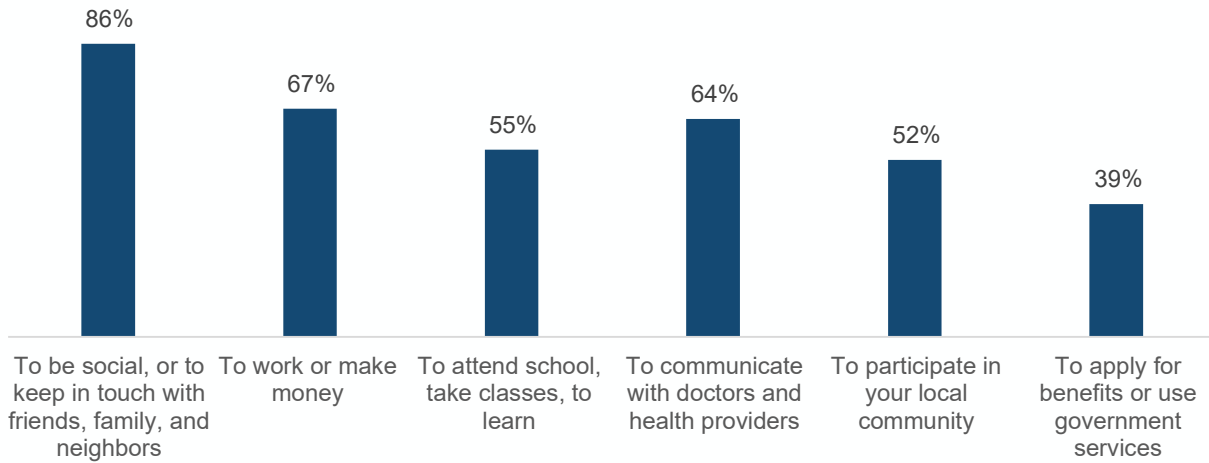


NTIA defines “meaningful use” of the internet to be “how an individual uses their digital literacy skills to enhance educational and employment opportunities.”⁴⁰ The Survey asked New Yorkers, “What do you use the internet for mostly?” 67% of New Yorkers surveyed used the internet “to work or make money” and 53% of New Yorkers surveyed used the internet “to attend school, take classes, or learn.” New Yorkers surveyed also use the internet for a wide variety of other purposes. Individuals reported the highest use of the internet for social connection such as keeping in touch with friends, family, and neighbors.

³⁹ In this bar chart and the charts to follow, “all respondents” includes New Yorkers in Covered Populations and New Yorkers not in Covered Populations.

⁴⁰ NTIA. “What does Digital Inclusion mean?”, at <https://broadbandusa.ntia.doc.gov/about-us/frequently-asked-questions/what-does-digital-inclusion-mean>.

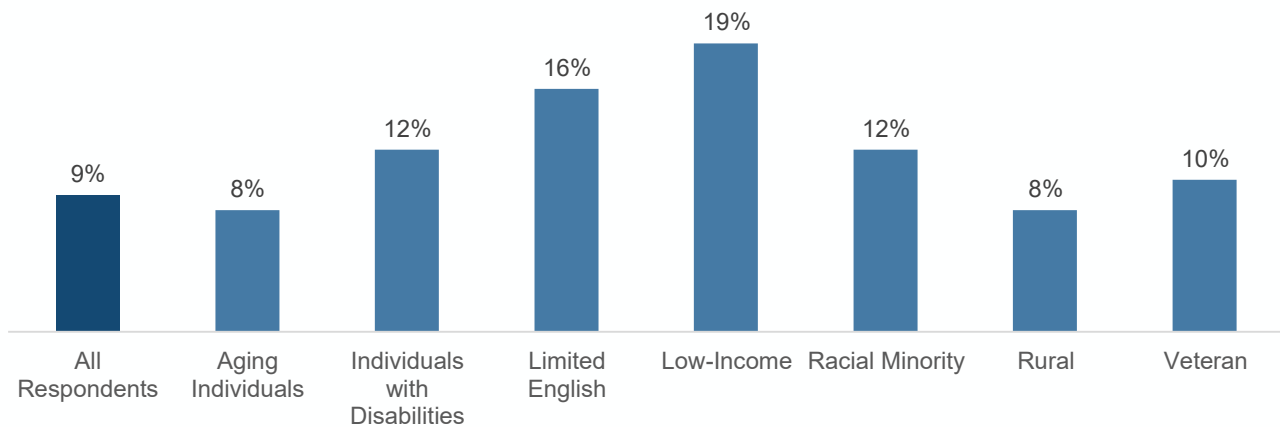
Figure 2: How Survey Respondents Say They Use the Internet Most Frequently



Accessibility of Devices and Device Support

9% of all New Yorkers surveyed do not have access to the internet-enabled devices they need at home. Among covered populations surveyed, low-income households, respondents with language barriers, racial minorities, and individuals with disabilities have less access to internet-enabled devices—such as laptops, smartphones, and desktop computers—than other New Yorkers.

Figure 3: Percentages of Respondents Whose Households Do Not Have Access to the Internet-Enabled Computer Devices They Need, Statewide and by Covered Population

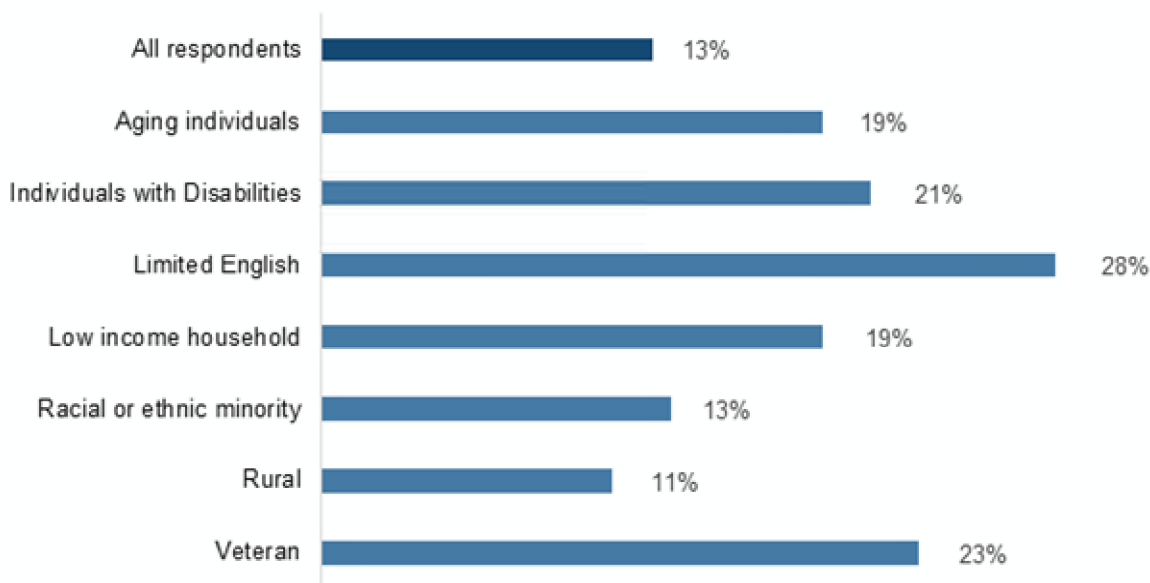


Digital Literacy

13% of New Yorkers surveyed find it difficult to navigate the internet to meet their needs. Certain covered populations are more likely to struggle than other New Yorkers.

- For individuals with language barriers and individuals with disabilities, focus groups noted that although these residents could access services online, online content is not accessibly designed (e.g., content is incompatible with screen readers or illegible). Representatives also reported a lack of digital equity and literacy services with adequate accessibility accommodations (e.g., ASL interpretation, braille materials).
- Focus groups also shared that digital literacy was a specific challenge for aging individuals and veterans, who may have difficulty keeping up with evolving technologies and be reluctant to engage with online tools due to higher-than-average concerns about cybersecurity and privacy (see below).

Figure 4: Percentages of Respondents Who Find It Difficult (i.e., Somewhat Difficult or Very Difficult) to Navigate the Internet to Do What They Need, Statewide and by Covered Population

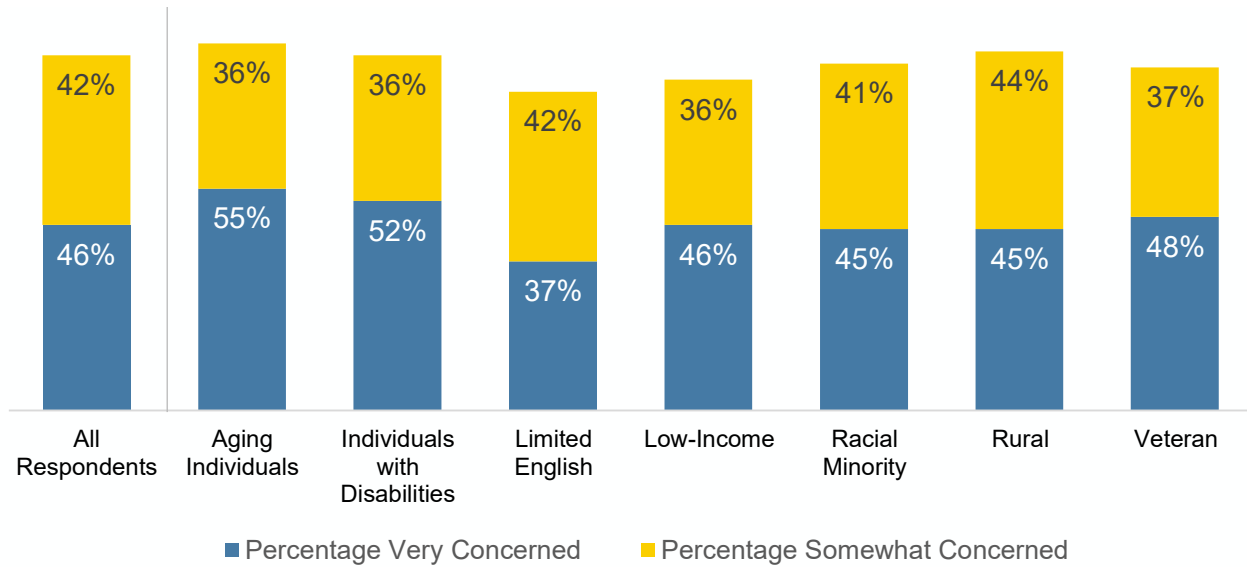


Online Privacy & Cybersecurity

New Yorkers are concerned about their safety and security online. 87% of New Yorkers surveyed are either somewhat concerned or very concerned, with Covered Populations roughly on par. A 2022 poll of 4,000 U.S. adults determined a similar share of all Americans

(84%) say they are “somewhat concerned” about the safety and privacy of the personal data that they provide on the internet.⁴¹

Figure 5: Percentages of Respondents Who Are Somewhat Concerned and Very Concerned About Internet Safety, Statewide and by Covered Population



Although respondents are emphatically concerned about their safety online, responses exhibit less clarity about the specific nature of those concerns. The survey offered four areas of concern for respondents to select among:

- My data could get stolen or used without my consent.
- I or a loved one could get scammed or tricked.
- I could be tracked or surveilled.
- I or a loved one could be harassed or abused online.

Survey respondents reported general discomfort regarding online safety and a lack of confidence in online safety skills; many did not respond to indicate any category of concern. In an exception, respondents with disabilities reported higher than average concern about online harassment and online abuse. In focus groups, aging individuals reported that they had experienced or learned about online scams and tricks through programming or news sources; and immigrants and refugees shared that some individuals might avoid engaging with online services and tools due to cybersecurity and privacy concerns. Focus groups conveyed a range of hard-to-categorize experiences of risks and harms as referenced in Chapter 3.2.1.

Accessibility of online essential resources and services

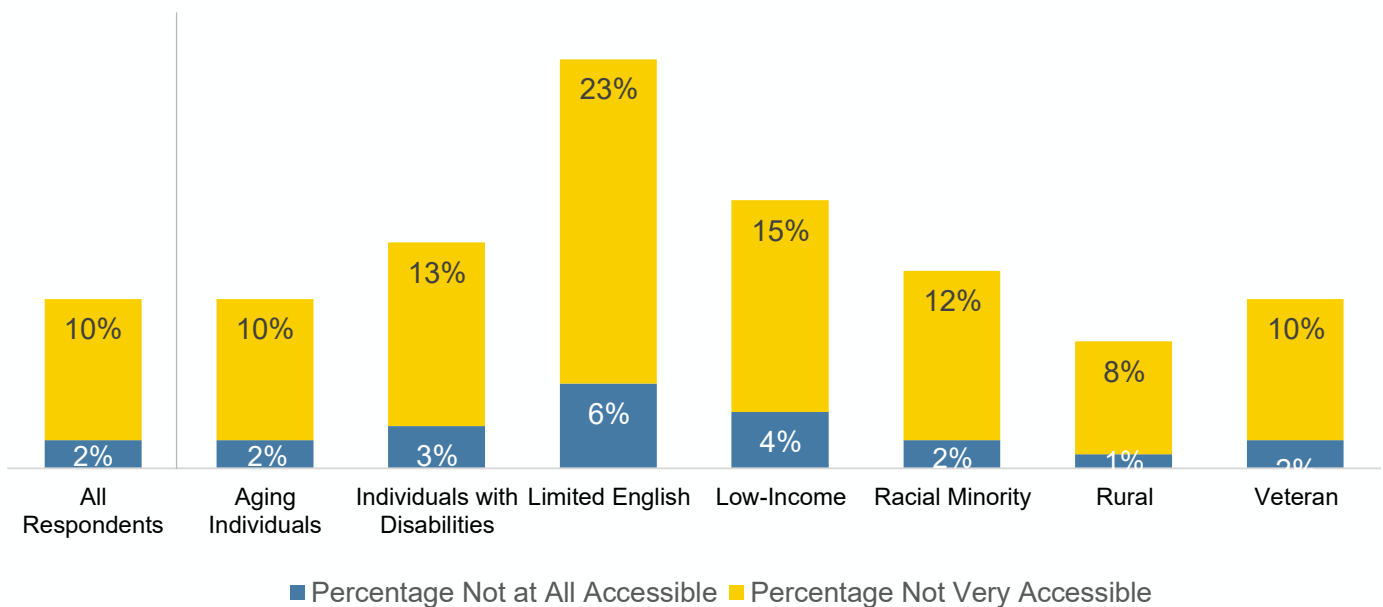
⁴¹ Newall, Mallory. “A majority of Americans are concerned about the safety and privacy of their personal data.” Ipsos, at <https://www.ipsos.com/en-us/news-polls/majority-americans-are-concerned-about-safety-and-privacy-their-personal-data>.

Covered Populations are almost universally more likely than other New Yorkers to struggle to access online public resources. One focus group reported “many public resources online are not user-friendly for those with disabilities, specifically the blind, visually impaired, deaf, hearing-impaired, and cognitively impaired community members.”

Of all Covered Populations, individuals with language barriers found online public resources least accessible. In focus groups, representatives from organizations working with English learners and people with low levels of literacy noted that even when internet service is available, inaccessibly designed websites and online services (e.g., those that do not have translations available) can prevent residents from accessing content and completing tasks online. As noted previously (see “Digital Literacy” above), many existing digital literacy programs are only offered in English, which compounds these individuals’ disproportionate difficulty.

Focus groups also reported concerns among immigrant and refugee communities about making personal information accessible to government agencies.

Figure 6: Percentages of Respondents Who Said Online Public Resources Were Not Very Accessible and Not at All Accessible, Statewide and by Covered Population



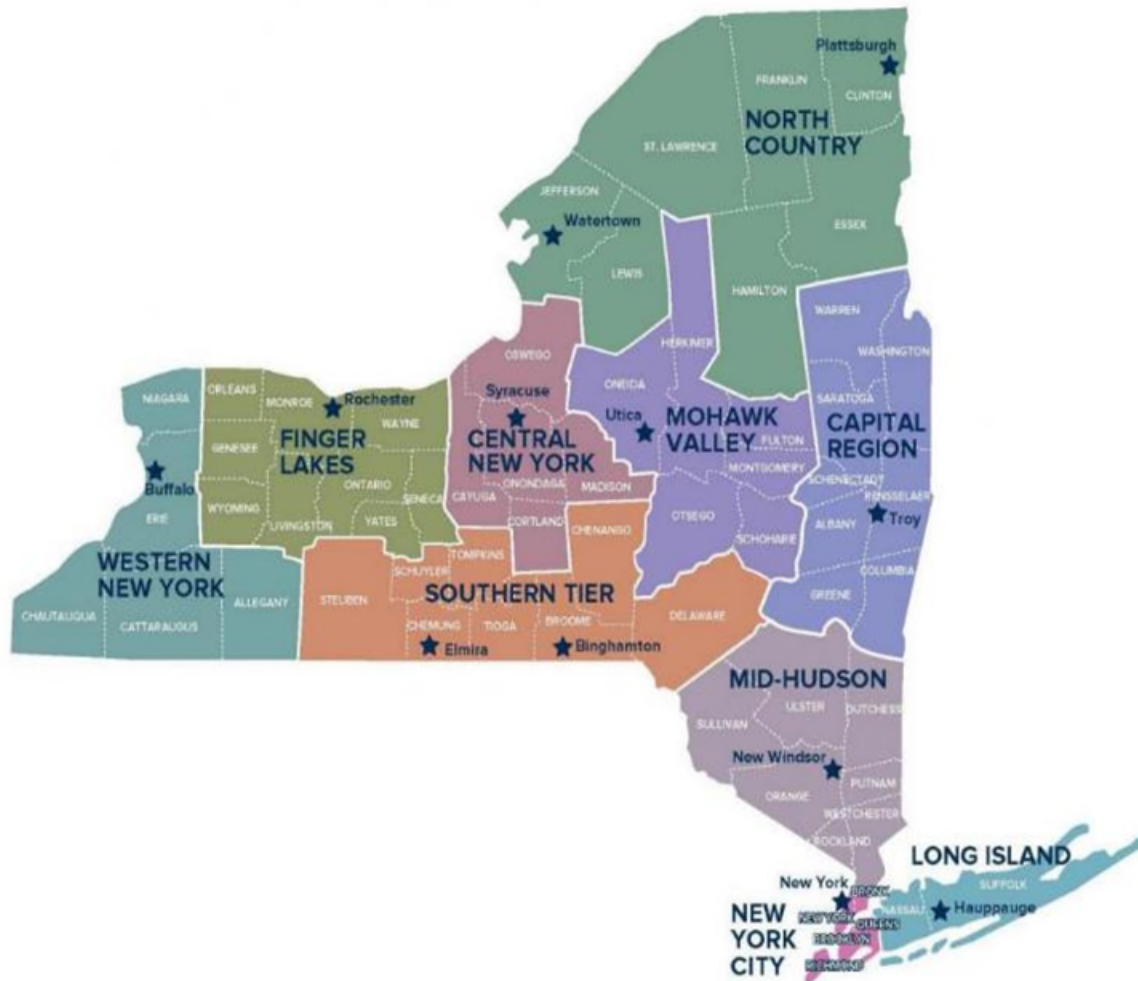
3.2.1 Existing Conditions by Covered Population

The Needs Assessment compared New York State Internet Access Survey responses from covered populations to the average responses statewide. Focus group data was used to deepen and add nuance to survey findings.

New York State Regions. Each assessment includes a map of the distribution of the covered population across the ten regions of New York State: Capital Region, Central New York, Finger

Lakes, Long Island, Mid-Hudson, Mohawk Valley, New York City, North Country, Southern Tier, Western New York.

Figure 7: Map of the Regions of New York State



Separately, a set of regional snapshots captures digital equity trends at the level of ten regions of New York as well as the five boroughs within the New York City region.

Intersectionality. Using the U.S. Census PUMS (Public Use Microdata Sample) tool, ConnectALL analyzed the prevalence of overlap between covered populations. Data found in PUMS data is based on individual census questionnaire responses rather than aggregated data with predetermined parameters, allowing analysis of demographics for individuals who are part of more than one covered population.

Covered populations with the highest intersectional demographics:

- 2.4 million New Yorkers or 12% of the state population consists of individuals that are both a racial or ethnic minority and live in a low-income household.

- 1.6 million New Yorkers or 7% of the state population are both aging and living with a disability.
- 1 million New Yorkers or 5% of the state population are individuals with language barriers and racial or ethnic minorities.⁴²

Detailed analysis of the degree of intersectionality between covered populations is available in **Chapter 7.1.4 Intersectionality of Covered Populations**.

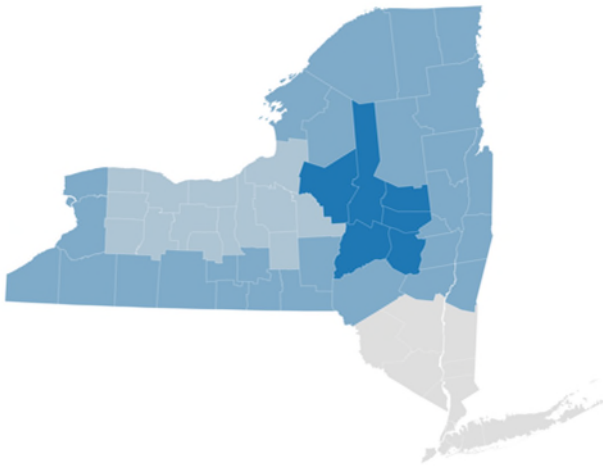
⁴² U.S. Census Bureau, ACS 2021 Public Use Microdata Sample (PUMS), at <https://www.census.gov/programs-surveys/acs/microdata.html>.

3.2.1.1 Aging Individuals

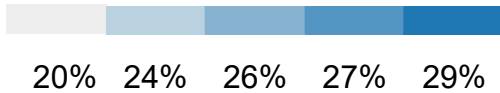
Aging Individuals are defined as individuals aged 60 or above. Aging individuals comprise 23% of the state population.

- 8% of the state population is both aging and a racial or ethnic minority;
- 7% of the population is both aging and living with a disability;
- 2% of the population is aging and a veteran.⁴³

Figure 8: Map of the Concentration of Aging Individuals by State Region



Percentage of population constituted by aging individuals (Source: ACS, 2017-2021)



Broadband Affordability & Availability

- 7% less likely than other New Yorkers to use an internet subsidy, according to the Survey.
- 4% less likely to be satisfied with their internet speed.
- Less likely than other New Yorkers to identify home internet as “very difficult” to pay for, but this may vary for aging individuals who are part of other covered populations including low-income households.
- More likely to use the internet to communicate with doctors and health providers; socialize with friends, family and neighbors; participate in their local community; and apply for or use public resources.

⁴³ *Id.*

Quotation from a focus group from the Finger Lakes region:

“I have internet at home; the price is ridiculous... It was a senior rate, but after the pandemic, it doubled. Trying to figure out now, do we want to keep it or not? Is there something else we can use?... We pay \$180. We only use it for TV and internet.”

Accessibility of Devices & Device Support

- 12% more likely to access the internet using a desktop computer. Conversely, they are less likely to use the internet through a smartphone (14%) or laptop (12%).
- Less likely to be able to troubleshoot technical challenges without some external technical support.
- Noted that regular one-on-one assistance via digital navigator or other tech support programs was helpful in building confidence and literacy.
- Focus groups noted a need for devices offering assistive technology (e.g., voice-enabled tablets).
- Focus groups also noted that regular one-on-one assistance was helpful in building confidence and literacy.

Quotation from a focus group from the Finger Lakes region:

“It’s one thing to train people on all this, but most of us learn through frequency and repetition. It requires one-on-one [support]... [We] need to create a culture of internet support and companionship...”

Digital Literacy

- In various measures of digital literacy, 8-23% are less likely to feel confident in their capabilities.
- Least likely to feel confident with skills related to using video chat and social media. Less likely than other New Yorkers to feel “completely confident” using video chat services (23%); email (14%); word processing applications (18%); banking (16%); and online shopping (18%).
- One focus group participant from the North Country region noted that one of the greatest benefits of the internet for them was *“being able to Zoom with family and friends during COVID shutdown.”*
- Another focus group noted that: “Technophobia was stated when it came to doing important business online such as paying bills or signing up for important services.”

Privacy & Cybersecurity

- Less likely to have concerns around online harassment; but almost 7% more likely to have concerns around stolen data and almost 6% more likely to have concerns around scams.
- 13% reported feeling “very concerned” about online security.

- Aging individuals in focus groups shared personal stories of themselves or their loved one getting scammed.

Quotation from a focus group from the Finger Lakes region:

“I stopped my husband one day... He got an alert that [he had owed] \$1,000 and he [had not paid]... I ran into the room ‘Scam, Scam!’ If I hadn’t been there, he would have clicked on that and called. I don’t know what would have happened after that.”

Accessibility & Inclusivity of Public Resources

- Less likely to be aware of the ACP or utilize internet subsidies, even though certain ISPs provide discounts for aging individuals. Aging individuals participating in focus groups noted that they would appreciate more information on affordability programs.
- Less likely to use accessibility features within government websites.

Quotation from a focus group from the Finger Lakes region:

“There was an FCC Lifeline program... A lot of people are not aware of these discounts. My godmother was able to get it simply based on zip code — I don’t know how many people are aware. I was not.”

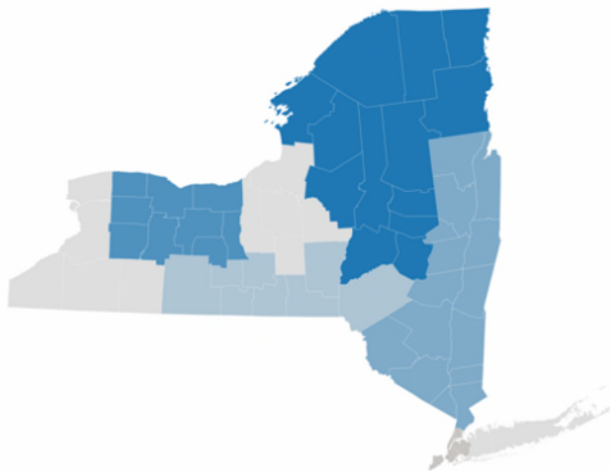
3.2.1.2 Formerly Incarcerated Individuals

Formerly incarcerated individuals are defined as individuals who were at any point in a carceral setting (e.g., prison, immigration detention center, jail, or juvenile detention) and are now released. According to the Bureau of Justice Statistics, approximately 30,300 individuals were imprisoned under the jurisdiction of state or federal correctional in 2021 and an estimated 28,000 were released in 2020 and 2021 combined.⁴⁴

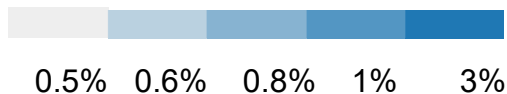
Upstate New York, including some of the least populous counties, has disproportionately high state prison incarceration rates—including people who lived elsewhere in the state prior to incarceration. Some of the least populous counties—Montgomery, Fulton, Genesee, Yates, and Franklin—have the highest imprisonment rates in the state.⁴⁵

Barriers summarized below, which originate from focus groups, generally become more severe the longer a person’s period of incarceration. (The NYS Survey did not result in a sample size of incarcerated individuals sufficient to make comparisons between this population and statewide averages.)

Figure 9: Map of the Concentration of Incarcerated Individuals by State Region



Percentage of population constituted by incarcerated individuals (Source: DEAPV)



⁴⁴ Carson, Ann E. “Prisoners in 2021 – Statistical Tables.” Bureau of Justice Statistics, Dec. 2022, at <https://bjs.ojp.gov/library/publications/prisoners-2021-statistical-tables>.

⁴⁵ Widra, Emily, and Nick Encalada-Malinowski. “Where People in Prison Come from: The Geography of Mass Incarceration in New York.” Prison Policy Initiative, Jun. 2022, at <https://www.prisonpolicy.org/origin/ny/2020/report.html>.

Broadband Affordability & Availability

- Individuals in jails and prisons lack reliable access to broadband internet, as do their visitors, such as families and loved ones. After exiting the criminal legal system, access to the internet and devices is strictly monitored for certain formerly incarcerated individuals.

Accessibility of Devices & Device support

- Incarcerated individuals and formerly incarcerated individuals want to use up-to-date technology, including up-to-date smartphones, rather than the lowest-cost or second-hand devices commonly accessible to them through some existing device accessibility programs.

Digital Literacy

- Incarcerated individuals do not have access to training on internet or device usage.
- Incarcerated individuals in focus groups said that they feel it is especially challenging to understand technology and internet-related vocabulary, due to the speed with which such terms develop and change.

Privacy & Cybersecurity

- Individuals who have not had access to internet and digital literacy skill-building while incarcerated re-enter a society without the necessary skills to protect themselves online.
- Unsafe or scam job solicitations are targeted at formerly incarcerated individuals, who already face barriers to employment. Targeted scams make it difficult to discern which opportunities are safe to respond to.

Accessibility & Inclusivity of Public Resources

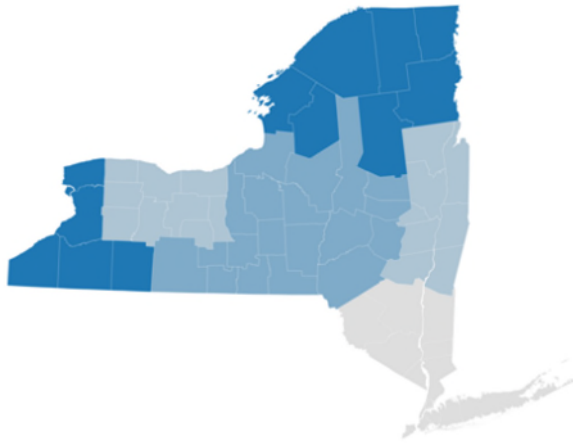
- Lack of adequate digital literacy maintained or learned while incarcerated contributes to challenges filling out government forms and services upon re-entry.

3.2.1.3 Individuals with Disabilities

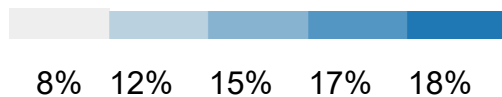
Individuals with disabilities are individuals who have difficulties related to hearing, vision, cognition, walking, self-care, or independent living.⁴⁶ Individuals with disabilities comprise 12% of the state population.

- 7% of the state population lives with a disability and is aging.
- 5% of the population lives with a disability and is a racial or ethnic minority.⁴⁷

Figure 10: Map of the Concentration of Individuals with Disabilities by State Region



Percentage of population constituted by individuals with disabilities (Source: ACS, 2017-2021)



Broadband Affordability & Availability

- 3% less likely than other New Yorkers to have any kind of internet at home.
- 12% more likely to use the internet to communicate with healthcare professionals and access online public resources.
- Those without internet access reported they want to use the internet to interact with healthcare professionals, the local community, social media, and public resources.
- One focus group participant stated she is particularly fond of telehealth. She utilizes it regularly for behavioral health and orthopedic services. It is particularly helpful to her because she often faces transportation barriers when accessing healthcare services in person.

⁴⁶ U.S. Census Bureau, "Disability Status," at <https://www.census.gov/quickfacts/fact/note/US/DIS010221>.

⁴⁷ ACS 2021 Public Use Microdata Sample (PUMS). *Supra*.

Accessibility of Devices & Device support

- 7% more likely to live without a laptop.

Digital Literacy

- 5-15% less likely to feel completely confident in various digital literacy skills evaluated in the Survey. Less confident with word processing applications (15%), resumes (12%), online learning (13%), e-commerce (12%), and online banking (13%).

Privacy & Cybersecurity

- 7% more likely to be very concerned with online safety. 5% more likely to be concerned with online harassment.

A quotation from the focus group from the Southern Tier region:

“I don’t know a lot about online security or privacy. We feel like we are going to places we shouldn’t, but we need to visit them for information or news. The internet can be scary when it comes to security or safety.”

Accessibility & Inclusivity of Public Resources

- 10% more likely to report public services as inaccessible.
- 12% more likely to use internet subsidies and be aware of ACP.

A quotation from a focus group from the North Country region:

“They go by the majority. They don’t go by the people that need help...It’s one size fits most.”

3.2.1.3a Further Engagement with People with Disabilities

ConnectALL undertook focused engagement with individuals and organizations serving people with disabilities to surface specific digital equity challenges and better inform the Plan with potential actions under the measurable objectives. In addition to addressing people with disabilities as a covered population within the regional engagement, ConnectALL conducted interviews with 12 representatives of organizations that serve people with disabilities across the state. Interviewees discussed both general needs of the covered population and specific needs of people who are b/Blind, low vision, d/Deaf, hard of hearing, d/DeafBlind, have intellectual and developmental disabilities, have physical disabilities, or have multiple disabilities. ConnectALL identified the critical importance of leadership by and for people with disabilities and a Universal Design approach (proactive, including hiring people with disabilities on the development team) rather than an accommodations approach (reactive, adding options for people with disabilities after the fact) as core tenets of Digital Equity in New York.

The disability community is diverse, but there are persistent barriers that curtail equitable online access and participation. For example, people with disabilities experience underemployment and unemployment at particularly high rates, and this in turn affects the affordability of internet access and devices, as well as assistive supports that enable online engagement. Complex eligibility requirements and duplicative benefit and services portals pose difficulties in using the internet for Digital Equity outcomes. Social isolation is a significant concern and a lack of meaningful and self-directed access to the internet can add to that harm. Additional findings include:

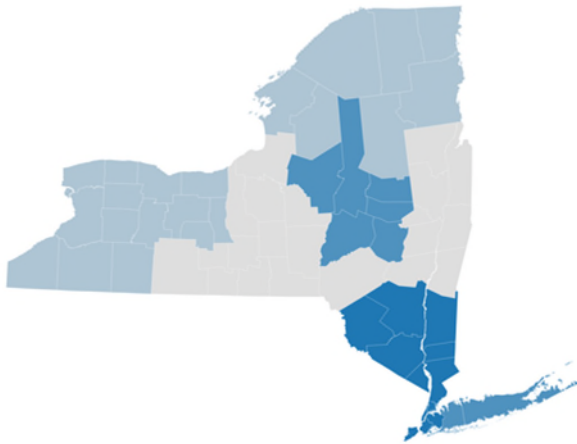
- **Broadband Affordability and Availability:** Often, the quality and speed of free or lower cost internet access subscriptions, like plans provided through government assistance, are not sufficient for many assistive technology needs (ex: video relay service for ASL translation). This is also the case for some medical settings, including hospitals, that still do not provide adequate bandwidth for video communication. Several interviewees suggested that internet access should be a covered expense under disability benefits or that subsidies should be prioritized for people with disabilities, recognizing their reliance on quality internet access.
- **Device Access and Support:** Smart home technologies like voice assistants and sensors that can support independent living are expensive. In rural areas of the state, individuals may have to travel much farther to reach community centers or public libraries that provide assistive technology and accessible spaces or device loan programs.
- **Digital Literacy:** Digital skills instructors may not have expertise or experience with accessibility or assistive technology, limiting their ability to develop training tailored to the disability community. People with lived experience and accessibility expertise need to be in instructional roles or providing more professional development to existing digital literacy programs and instructors.
- **Privacy and Cybersecurity:** Reliance on digital access to benefits may create more vulnerability to untrustworthy connections and scams. For example, screen readers often require users to click on unlabeled links to figure out what they are, inadvertently opening files or connections that may host a virus. In addition, surveillance is a concern for some who worry that data and media could be used to incorrectly gauge if they are “disabled enough” to qualify for essential benefits.
- **Accessibility of Government Resources and Services:** Inconsistency in design and structure is a common barrier for people interacting with the web, especially when using assistive technology. Many websites and software applications do not follow WCAG or Section 508 accessibility standards, and if the content itself is not provided in an accessible format, it is a barrier. People also face significant delays when accessible alternate formats are not provided up front and need to be requested, for example, a job application that can be navigated using a screen reader.

3.2.1.4 Individuals with Language Barriers

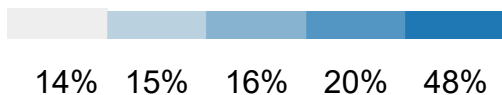
Individuals with language barriers are individuals who have difficulty communicating in English or individuals with low English language literacy. Individuals with language barriers comprise 26% of the state population.

- 6% of the state population has language barriers and is a racial or ethnic minority.⁴⁸

Figure 11: Map of the Concentration of Individuals with Language Barriers by State Region



Percentage of individuals with language barriers (Source: DEAPV)



Broadband Affordability & Availability

- 7% less likely to have internet at home and 13% less likely to have broadband internet access at home.
- 11% more likely to say that paying for internet is very difficult and 10% more likely to say that the internet service they do have is unreliable.
- Focus group participants mentioned several barriers to accessing the internet: having to share the internet and devices with many family members, or having to pay for limited amounts of data that is quickly used up and then “*the internet no longer works.*”

⁴⁸ *Id.*

Quotation from a focus group from the Mid-Hudson region:

“[I] don’t have a Social Security Number or other documentation required to purchase an Internet plan on my own.”

Accessibility of Devices & Device Support

- 4% more likely than other New Yorkers to access the internet through a smartphone; 8% less likely than others to access the internet through a laptop.
- More likely to seek technical support from user support services, friends, and family than other New Yorkers, but 6% were more likely to report not being able to fix their device.
- Focus group participants noted that cost is a barrier to having sufficient devices.

Digital Literacy

- Across the various digital literacy skills evaluated, 7-26% less likely to feel “completely confident” in their capabilities, including building resumes (26% less likely to feel “completely confident”), using word processing systems (22% less likely), online shopping (23% less likely), and using email (21% less likely).

Quotation from a focus group from the Southern Tier region:

“language barrier[s] exists for non-English speakers AND for those that are not tech savvy —jargon is a barrier.”

Privacy & Cybersecurity

- Focus group participants noted that virtual scams can be concerning, especially when related to jobs and housing. One participant shared information about false job advertisements online; another shared her family members’ concerns over being targeted and tracked due to their immigration status.

Accessibility & Inclusivity of Public Resources

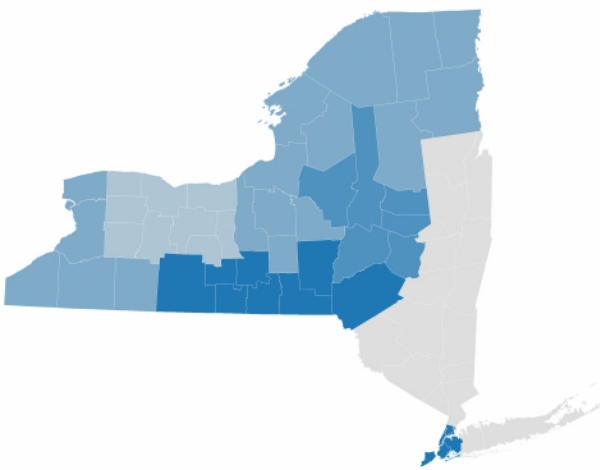
- 3% less likely to report having a good experience with public resources such as benefits portals, DMV services, or paying for permits or tickets.
- 12% more likely than others to use internet subsidies.
- Focus groups conveyed that government websites are hard to navigate, include inaccessible language like government jargon, and do not consistently offer non-English language options, all of which hinders the ability to apply for benefits or services. On some sites where language translation was available, the translated text was unreliable or introduced glitches on the site.

3.2.1.5 Low-income Households

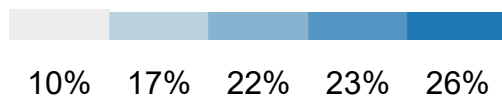
Low-income households are defined as households making at or below 150% of the poverty level, which is calculated by factoring in household size, number of children, and annual income per household.⁴⁹ Low-income households comprise 20% of the state population.

- 12% of the state population lives in a low-income household and is racial or ethnic minority;
- 4% of the population lives in a low-income household and is aging (over age 60);
- 4% of the population lives in a low-income household and lives with a disability.⁵⁰

Figure 12: Map of the Concentration of Low-Income Households by State Region



Percentage of households with incomes below 150% of the federal poverty line (ACS, 2017-2021)



Broadband Affordability & Availability

- 9% less likely than other New Yorkers to have internet at home and 8% less likely to have broadband internet at home.
- Less likely to report reliable internet service and 16% more likely to report finding it very difficult to pay for internet each month.

⁴⁹ U.S. Department of Education. "Federal TRIO Programs Current-Year Low-Income Levels." Policy Guidance; Programs; Guides. Feb. 3, 2023, at <https://www2.ed.gov/about/offices/list/ope/trio/incomelevels.html>.

⁵⁰ ACS 2021 Public Use Microdata Sample (PUMS). *Supra*.

Quotation from a focus group from Long Island:

“All noted that the monthly internet bills are exorbitant. Internet service, routers, boxes, taxes. Bill for one respondent is \$195/month. Internet access is priced like entertainment and not a utility. Participants indicated that the internet service providers sell services in bundled packages, making it impossible to access affordable basic internet service separate from entertainment packages for various television channels.”

Accessibility of Devices & Device Support

- 7% less likely to access the internet through a desktop and 20% less likely to access the internet through a laptop.
- When reporting seeking support, were most likely to find technical support through user support services, family and friends, and community organizations.

Digital Literacy

- Less likely to report “complete confidence” in all digital literacy skills surveyed, including using the internet to build resumes (23% less likely), bank online (19% less likely), online shop (20% less likely), and use word processing applications (20% less likely).

Privacy & Cybersecurity

- Low-income households were as likely as other New Yorkers to be concerned with online security or harassment.
- However, several focus group participants mentioned concerns about online scams that advertise jobs and affordable housing. One participant noted that she responded to an advertisement for affordable housing requiring an immediate online deposit, but the advertiser then disappeared with the money.

Accessibility & Inclusivity of Public Resources

- Low-income households were 21% more likely to use internet subsidies than other New Yorkers and 12% more likely to be aware of ACP.
- Low-income households, who were also more likely to face language barriers, conveyed in focus groups that government websites were hard to navigate, included inaccessible language such as government jargon, or did not offer non-English language options which hinders the ability to apply for benefits or services.

Quotation from a focus group from the Mohawk Valley region:

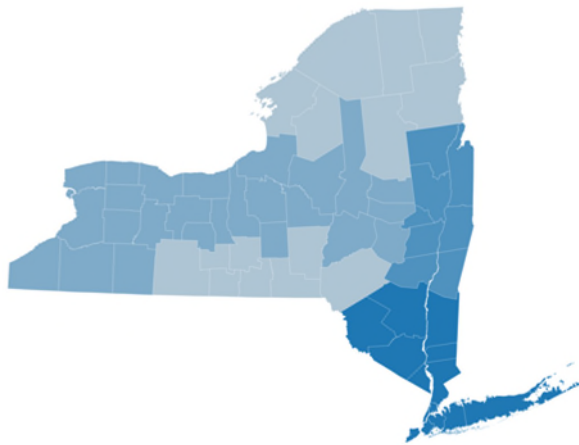
“Some feel they [government websites] are too complicated to navigate and people stop trying and don’t apply because they get frustrated—IRS, public health, DMV, recreational info, assistance programs and benefits, government docs, etc.”

3.2.1.6 Racial and Ethnic Minorities

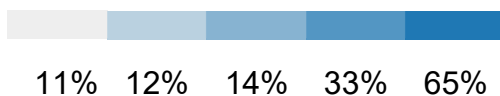
Members of racial and ethnic minority groups are defined as individuals who identify as a member of a race other than white, or who identify as Hispanic or Latino. Racial and ethnic minorities comprise 45% of the state population.

- 12% of the state population is a racial or ethnic minority and lives in a low-income household;
- 8% of the population is a racial or ethnic minority and aging (over age 60); 6% of the population is a racial or ethnic minority and has language barriers.⁵¹

Figure 13: Map of the Concentration of Racial and Ethnic Minorities by State Region



Percentage of population constituted by racial and ethnic minorities (Source: ACS, 2017-2021)



Broadband Affordability & Availability

- 5% less likely than other New Yorkers to have internet at home, and 5% less likely to have broadband internet.
- 8% more likely to report internet bills are very difficult to afford.
- More likely to connect to the internet at spaces outside the home, such as workplaces, school, or community institutions. Focus group participants repeatedly mentioned going to the library to access the internet.

⁵¹ *Id.*

Accessibility of Devices & Device Support

- More likely to access the internet through smartphones and tablets than others and less likely to access the internet through a desktop or laptop.
- 7% more likely to leverage user support services when facing technical difficulties.
- According to several focus group participants, cost and languages offered for repair services or customer support is a barrier when seeking assistance.

Digital Literacy

- Less likely to report “complete confidence” in a variety of digital literacy skills including using word processing applications (9% less likely), banking online (8% less likely) and building resumes (6% less likely).
- Several focus group participants noted daytime timing of digital literacy classes hinders their ability to learn if they are working during the day.

Quotation from a focus group from the Mid-Hudson region:

“Free computer classes have to be during the night because most of them are during the day while people are working, or on Saturday.”

Privacy & Cybersecurity

- 4% more likely to report concerns about harassment online.
- Focus groups expressed concern over information being stolen; almost all members of a single focus group experienced issues paying with credit cards online or having had their banking information compromised online.

Accessibility & Inclusivity of Public Resources

- 14% more likely to use internet subsidies and 5% more likely to be aware of the ACP.
- Racial and ethnic minorities, who were more likely to also face language barriers, noted in focus groups that some websites needed Spanish language translation. On some sites where Spanish language translation was available, the translated text was unreliable or introduced glitches on the webpage.

3.2.1.7 Rural Inhabitants

Rural inhabitants are defined here as people mainly living in 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 with a population of over 50,000 inhabitants; and 3. A city, town, or incorporated area that has a population of greater than 20,000 inhabitants. The methodology for designating survey respondents as urban or rural is described in **Chapter 7.2 Survey Data Analysis Methodology.**

Broadband Affordability & Availability

- New Yorkers from rural areas were 9% less likely to have internet service at high speeds. Lack of broadband internet is corroborated by FCC data. Rural inhabitants turn to less reliable, slower connections like legacy satellite and DSL services.
- Less likely to use the internet for healthcare and accessing public resources.

Quotation from a focus group from the Finger Lakes region: “I completed my master’s degree online. Online access was almost impossible. I had to move from Branchport to Prattsburgh to complete any online activity.”

Accessibility of Devices & Device Support

- When facing technical difficulties, less likely to seek technical support through user support services or a community-based organization.

Digital Literacy

- Did not demonstrate significant digital literacy deficiencies like other New Yorkers.

Privacy & Cybersecurity

- Did not demonstrate significant cybersecurity fears compared to other New Yorkers.

Quotation from a focus group from the Capital region: “We don’t have internet here and we have to go use public Wi-Fi. We expose ourselves to greater risk of online scams or identity theft.”

Accessibility & Inclusivity of Public Resources

- 4% more likely to report having a satisfactory experience with government service such as benefits portals, DMV services, or paying for permits or tickets than other groups.
- 8% less likely to use internet subsidies.

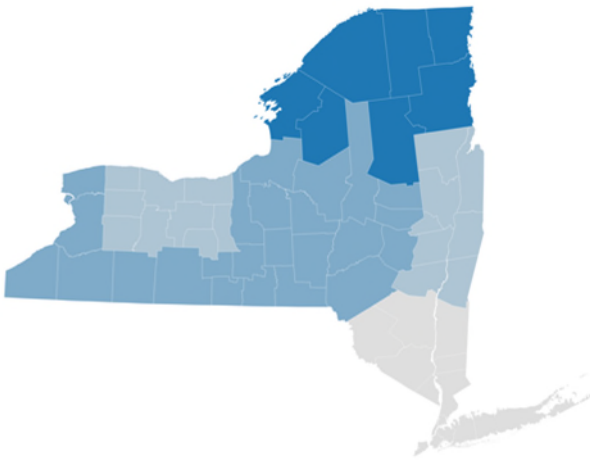
Quotation from a focus group from the Southern Tier region: “Many agencies are trying to force people online to complete certain activities and people get left behind.”

3.2.1.8 Veterans

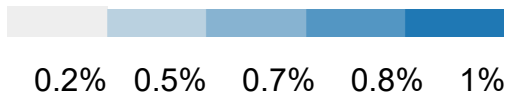
Veterans are defined as individuals who served on active duty in the U.S. Armed Forces, Reserves, or National Guard.⁵² Veterans comprise 3% of the state population.

- 2% of the state population is veteran and aging (over age 60).
- 1% of the population is a veteran and living with a disability.⁵³

Figure:14 Map of the Concentration of Veterans by State Region



Percentage of population constituted by veterans of the US Armed Forces (ACS, 2017-2021)



Broadband Affordability & Availability

- Internet access was in line with that of other New Yorkers.
- 24% less likely than others to use the internet for work and 12% less likely to use the internet for education.

Accessibility of Devices & Device Support

- 10% more likely than others to access the internet using a desktop computer.
- Conversely, 10% are less likely to access the internet using a smartphone and 11% less likely to access the internet using a laptop.

Digital Literacy

⁵² U.S. Census Bureau. "American Community Survey (ACS) Topic Information: Veterans." <https://www.census.gov/content/dam/Census/topics/population/veterans/guidance/acs-topic-information-veterans.pdf>.

⁵³ ACS 2021 Public Use Microdata Sample (PUMS). *Supra*.

- In every measure of digital literacy, at least 5% less likely to feel “completely confident” in their capabilities. Less likely to report “complete confidence” with skills related to using video chat (13%), social media (11%), online shopping (15%), and word processing applications (14%).
- Focus group participants reported that they rely on friends and younger family members to help them overcome digital literacy issues such as basic troubleshooting and hardware issues.

Quotation from a focus group from Long Island:

“Another participant in a focus group who works for a skilled nursing and adult day care facility for veterans estimated that 70% of the patient population could not benefit from telehealth offerings during COVID due to lack of access, devices, and/or digital literacy.”

Privacy & Cybersecurity

- Demonstrated fears around cybersecurity at levels like other New Yorkers.
- Focus group participants noted they feared their information would be stolen online, noting identify theft, getting hacked, and/or scammed as specific concerns. One shared falling victim to Medicare fraud and another discussed having had their identity stolen.

Quotation from a focus group from the Capital Region:

“Veterans are a group that is quite frequently by scammers, we work in close collaboration with SEC and NY Attorney General to crack down, veterans have been warned not to click on things, they have been told to be secure.”

Accessibility & Inclusivity of Public Resources

- 6% less likely to utilize ACP than other New Yorkers.
- Focus groups noted reluctance to use the internet for activities such as filing a benefits claim: “I don’t want you to file a claim for me if it is going on the computer,” but would rather mail “a physical copy” because they don’t trust the internet with their information. This causes a “delay in receiving services.”

3.2.1.9 Other Communities

While Survey and focus group data were collected and analyzed for the 8 specific covered populations as defined by NTIA, ConnectALL engaged other populations and communities via the planning process that are also disproportionately impacted by digital inequity. The needs and barriers to full adoption and meaningful use of broadband internet faced by these populations are summarized below.

Native American & Tribal Nations

ConnectALL engaged with the Saint Regis Mohawk Tribe (SRMT) and Seneca Nation (SNI) through a formal Tribal consultation process. Through these engagements, representatives from the two tribal nations shared insights on the state of broadband and digital equity in their respective communities.

Regarding the availability and affordability of broadband internet, SRMT owns its own broadband enterprise, Mohawk Networks, LLC, which provides internet services to over 1,500 homes on the territory, with about 25% of those households participating in ACP. For those citizens of SRMT without internet, there are some citizens that purposefully do not adopt because they do not want it. Others cite affordability as a barrier to adoption, as well as the difficulty of enrolling in ACP. As for SNI, about 50% of members have adopted internet, leaving roughly 600 households unconnected. SNI also sees challenges with the accessibility of devices and would like to establish central, accessible computer labs or other internet-enabled device centers for those who do not have personal devices or internet at home.

Regarding digital literacy, SRMT has seen success with public community centers that provide digital literacy training. Despite the success of this program and positive impacts on internet adoption, the program has exhausted current funding. SNI also voiced a need for more digital literacy training and programs. Consultations with both tribes elevated telehealth as a shared challenge due to clients' lack of internet and personal devices, a lack of healthcare professionals to provide digital care, and a lack of funding to support telehealth adoption programs.

Immigrants & Refugees

ConnectALL collected qualitative data on the needs and barriers that hinder immigrants and refugees from full and meaningful adoption of the internet, via focus groups and based on the input of DEC's.

Affordability is a significant barrier for refugees and immigrants accessing both at-home internet service and internet-enabled devices. Many immigrants and refugees cannot access mainstream employment due to a lack of documentation, and some earners are financially committed to support extended family both in the U.S. and in their country of origin. For immigrants and refugees that do subscribe to an internet plan, the financial burden makes them more likely to subscribe to the lowest-cost plans that do not provide service at sufficient speeds. Regarding internet-enabled devices, programs exist to provide devices to this

population (see **Asset Inventory 3.1.1**); however, these resources are limited, and focus groups noted that the quality of devices is low.

Language barriers are a challenge for this population to access online public resources, including applying for ACP to alleviate internet costs. It is often overlooked how truly diverse the refugee and immigrant populations are in New York State; a regional partner in the Mohawk Valley said that this population hails from dozens of different countries and speaks over 40 different languages.

Immigrants and refugees are particularly concerned about online surveillance due to experiences with conflict, government violence, and/or persecution, or due to a lack of legal citizenship documentation. Immigrants and refugees are also disproportionately vulnerable to scams that exploit their unfamiliarity with U.S. public resources or fear of making mistakes that could lead to deportation.

Youth

ConnectALL learned about the challenges that youth face in full, meaningful internet adoption through listening sessions, Digital Equity Task Force meetings, and via the input of DECs. One DETF Education meeting participant underscored the importance of internet access and affordability for youth in school: “You can’t make it in New York schools without internet access [because] every teacher is required to post course content, learning, and grades online.” Schools and libraries have been important places to access the internet for youth who lack broadband internet at home, but these institutions are not available 24 hours a day or on weekends; as a result, some youth sit in school parking lots to access Wi-Fi or depend on smartphones at home for all their education needs. Fortunately, school districts and other institutions have been effective in providing internet-enabled devices to youth (see **3.1 Asset Inventory**). Youth face unique levels of vulnerability to cyberbullying, online harassment, and negative mental health effects linked with use of social media.

Affordable Housing Residents

Initiatives addressing broadband access and adoption needs and barriers for affordable housing residents are in alignment with ConnectALL’s goals and measurable objectives. ConnectALL recognizes the intersectional identities of covered populations living in affordable housing and understands that affordable housing developments are important delivery partners for digital equity programs and services to covered populations: 28% of affordable housing residents live with disabilities, 76% are racial or ethnic minorities, and 52% are older adults (over age 60).⁵⁴ ConnectALL’s Affordable Housing Connectivity Program (AHCP) will provide owners of affordable housing with new or upgraded broadband infrastructure so tenants can access high-quality home internet service at affordable monthly rates. In addition to the deployment of these funds, ConnectALL plans to deliver on-site digital equity services

⁵⁴ HUD Office of Policy Development and Research. “Assisted Housing: National and Local: Picture of Subsidized Households,” 2022, at <https://www.huduser.gov/portal/datasets/assthsg.html>.

with the support of local and regional partners. ConnectALL will seek opportunities to amplify the impact of the AHCP with further investments into digital equity initiatives for affordable housing residents.

Table 3: Intersection between Affordable Housing Residents and Covered Populations⁵⁵

Region	Median Household Income		Racial and Ethnic Minorities		Individuals with Disabilities		Older Individuals (Age 60+)	
	Affordable Housing Residents	Region Average	Affordable Housing Residents	Region Average	Affordable Housing Residents	Region Average	Affordable Housing Residents	Region Average
Capital Region	\$16,988	\$64,400	45%	17%	32%	15%	48%	27%
Central New York	\$15,150	\$62,600	45%	12%	27%	16%	46%	25%
Finger Lakes	\$16,183	\$62,300	56%	13%	34%	15%	45%	26%
Long Island	\$22,943	\$119,000	63%	38%	24%	8%	64%	24%
Mid-Hudson	\$21,525	\$86,400	63%	30%	17%	12%	49%	24%
Mohawk Valley	\$15,013	\$59,300	35%	12%	33%	17%	46%	28%
New York City	\$21,092	\$74,000	89%	65%	28%	12%	53%	21%
North Country	\$15,196	\$59,200	8%	11%	38%	18%	46%	27%
Southern Tier	\$14,885	\$58,100	27%	11%	34%	17%	44%	27%
Western NY	\$15,015	\$56,300	58%	14%	29%	18%	44%	27%

⁵⁵ ACS 2021 Public Use Microdata Sample (PUMS). *Supra.*

3.2.2 Regional Needs Assessment

The Needs Assessment processed New York State Internet Access Survey responses by region to produce reports, or “snapshots,” capturing broadband and digital equity findings in the ten distinct regional geographies of New York State: Capital Region, Central New York, Finger Lakes, Long Island, Mid-Hudson, Mohawk Valley, North Country, Southern Tier, and Western New York. Each of New York City’s five boroughs—the Bronx, Brooklyn, Manhattan, Queens, and Staten Island—also has a separate snapshot.

Each snapshot contains the following information:

- Demographic information from the region to help compare regional covered populations to the broader composition of the state.
- Selected Survey data across five broadband and digital equity areas: Broadband Affordability & Availability, Accessibility of Devices & Device Support, Digital Literacy, Privacy & Cybersecurity, and the Accessibility & Inclusivity of Public Resources
- Significant findings from focus groups, where applicable, to provide nuance and further depth on challenges affecting covered populations in specific regions.

NYS REGIONAL SNAPSHOTS

New York State

New York State is home to a diverse population with uneven experiences accessing and using the internet. In surveys and focus groups, residents noted gaps in high-quality broadband options, digital literacy training, and a sense of safety online. New Yorkers statewide celebrated libraries as trusted public stewards of digital equity.



New York State Snapshot

Digital Equity Act Covered Populations

Population	New York State (NYS)	
Veterans	4%	800K
Aging Individuals	23%	4.6 Million
Low-income Households	21%	4.1 Million
Individuals with Language Barriers	26%	5.1 Million
Individuals with Disabilities	12%	2.4 Million
Rural Residents	20%	3.9 Million
Racial and Ethnic Minorities	45%	8.7 Million

20.1 million people 7.5 million households

87% of households have any type of broadband internet (ACS).

\$75,200 median household income.

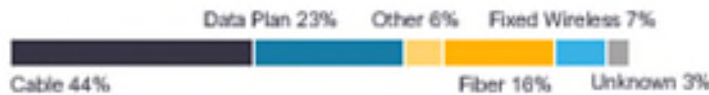
29% of households earning under \$35k/year do not have internet, while 13% of households earning \$35k-75/year do not have internet, and 4% of households earning over \$75k/year do not have internet.

Nearly 50% of eligible households enrolled in the Affordable Connectivity Program (1.6m).

The median household spends \$75-90/month on internet.

Internet | Broadband Affordability & Availability

In New York, 4% of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). 13% of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



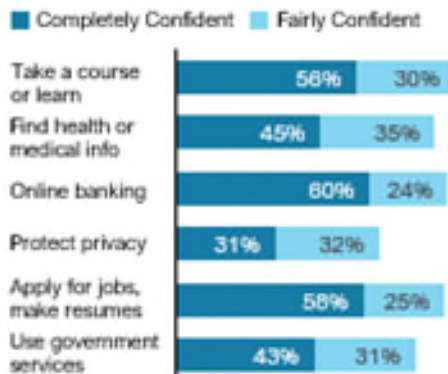
Devices | Accessibility of Devices & Device Support

8% of households do not have a computer and 8% only have a smartphone (ACS). 91% of respondents stated everyone in their household has access to the devices they need. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups across the state highlight a need for training around protecting privacy online. New Yorkers were most confident in online banking and applying for jobs online.



Privacy & Cybersecurity

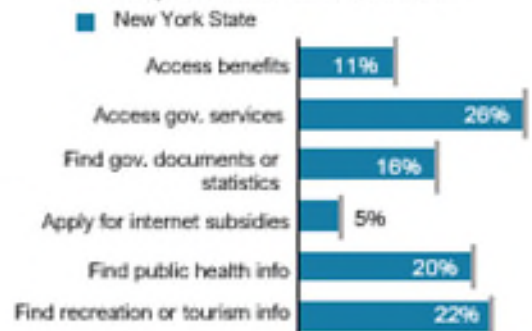
87% of New Yorkers are concerned or very concerned about digital safety. Survey respondents mention the following concerns:



Accessibility of Public Resources

34% of New Yorkers rated past experiences with online government services as fair or poor. Of all online services, New Yorkers were likeliest to access government services.

In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B28002). Unless otherwise noted, other results on internet access come from survey and focus group data and a recodeset sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

The Capital Region

The Capital Region contains a higher share of rural residents than other parts of the state. In surveys and focus groups, residents noted the region generally lacks high-quality broadband options and shared that many residents are not adequately served. Residents reported the lack of satisfactory internet speed hinders them from meeting their needs online.



Digital Equity Act Covered Populations

Population	Capital	NYS
Veterans	6%	4%
Aging Individuals	25%	23%
Low-income Households	16%	20%
Individuals with Language Barriers	14%	26%
Individuals with Disabilities	13%	12%
Rural Residents	42%	20%
Racial and Ethnic Minorities	19%	45%

Capital Region Snapshot

1,105,100 people **451,900** households **87%** of households have access to any broadband internet, compared to **87%** in NYS (ACS).

\$76,100 median household income

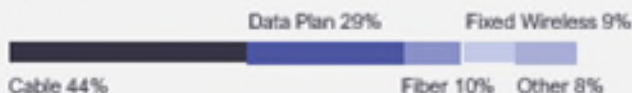
30% of households earning under **\$35k/year** do not have internet, while **13%** of households earning **\$35k-75/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

47% of eligible households (75,700) enrolled in Affordable Connectivity Program.

The median household spends **\$80/month** on internet, compared to **\$75-90/month** statewide.

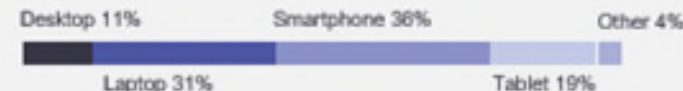
Internet | Broadband Affordability & Availability

In the Capital Region, **5%** of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). **13%** of households do not have any type of broadband internet (ACS). Among households that do have internet, surveyed respondents primarily rely on cable.



Devices | Accessibility of Devices & Device Support

7% of households lack a computer and **6%** are smartphone-only internet subscribers (ACS). **5%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups highlighted challenges navigating websites, since layouts sometimes change over time. Respondents were most confident in learning, online banking, and applying for jobs / making resumes online.



Privacy & Cybersecurity

87% of residents in the Capital Region are concerned or very concerned about digital safety. Focus group participants noted that users of public Wi-Fi felt at higher risk of scams or data theft. Survey respondents noted the following concerns:



Accessibility of Public Resources

30% of Capital Region residents rated past experiences with online government services as fair or poor. Focus group participants found it challenging to find information about services spread across different government websites. In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NYU/US Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B28002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office. NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

Central New York

Central New York has a larger share of rural residents than other regions of the state. Residents in focus groups valued libraries and community centers as valuable places to learn digital skills through trainings, community events, and other programs.



Digital Equity Act Covered Populations

Population	Central NY	NYS
Veterans	6%	4%
Aging Individuals	24%	23%
Low-income Households	21%	20%
Individuals with Language Barriers	15%	26%
Individuals with Disabilities	14%	12%
Rural Residents	44%	20%
Racial and Ethnic Minorities	17%	45%

Central New York Region Snapshot

784,700 people **310,700 households** **85%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$64,300 median household income

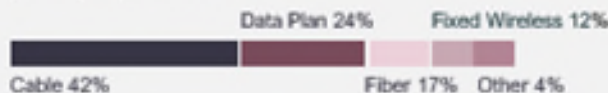
32% of households earning under **\$35k/year** do not have internet, while **13%** of households earning **\$35k-75k/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

50% of eligible households enrolled in the Affordable Connectivity Program (71,200).

The median household spends **\$80/month** on internet, compared to **\$75-90/month** statewide.

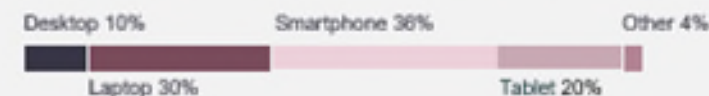
Internet | Broadband Affordability & Availability

In Central New York, 4% of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). 15% of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



Devices | Accessibility of Devices & Device Support

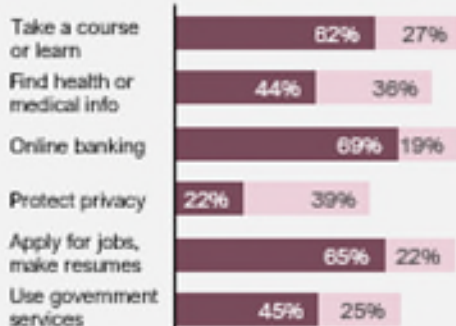
9% of households lack a computer and 7% are smartphone-only internet subscribers (ACS). 7% of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups highlighted that compared to other activities, they used the internet less for government services. Respondents were most confident in learning and banking online.

■ Completely Confident □ Fairly Confident



Privacy & Cybersecurity

90% of residents in Central New York are concerned or very concerned about digital safety. Focus group participants noted theft of banking information online. Survey respondents mentioned the following concerns:



Accessibility of Public Resources

37% of Central New York residents rated past experiences with online government services as fair or poor. Focus groups highlighted that many websites are not easy to translate or navigate.

In the last year, residents used the internet to...

■ Central New York ■ New York State



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B28002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet, Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

The Finger Lakes

The Finger Lakes has a larger share of rural residents than other regions of the state. In focus groups, residents felt that local government needed to build more awareness of digital literacy services available. Libraries with digital skills programming could be expanded and better advertised to residents.



Digital Equity Act Covered Populations

Population	Finger Lakes	NYS
Veterans	5%	4%
Aging Individuals	24%	23%
Low-Income Households	20%	20%
Individuals with Language Barriers	16%	26%
Individuals with Disabilities	15%	12%
Rural Residents	40%	20%
Racial and Ethnic Minorities	22%	45%

Finger Lakes Region Snapshot

1,221,300 people **499,000** households **87%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$65,400 median household income

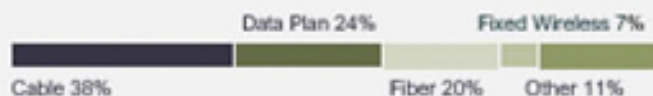
29% of households earning under **\$35k/year** do not have internet, while **12%** of households earning **\$35k-75k/year** do not have internet, and **4%** of households earning over **\$75k/year** do not have internet.

51% of eligible households enrolled in the Affordable Connectivity Program (106,200).

The median household spends **\$70-80/month** on internet, compared to **\$75-90/month** statewide.

Internet | Broadband Affordability & Availability

In the Finger Lakes, **4%** have internet speeds lower than 100/20 Mbps available (FCC). **13%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



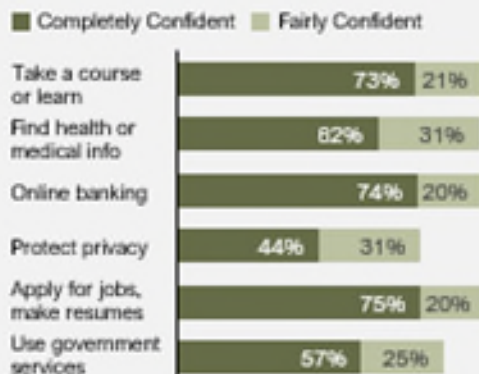
Devices | Accessibility of Devices & Device Support

8% of households lack a computer and **7%** are smartphone-only internet subscribers (ACS). **4%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups celebrating existing programming at libraries on digital literacy while requesting more trainings overall. Respondents were most confident in applying for jobs and online banking.



Privacy & Cybersecurity

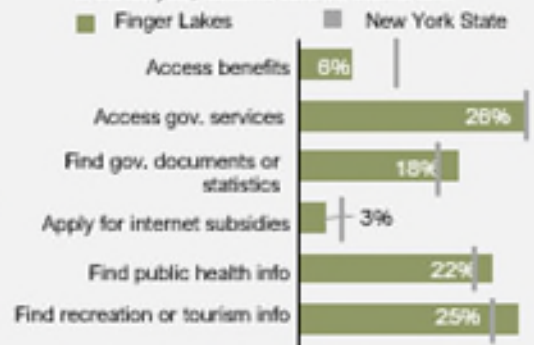
89% of residents in the Finger Lakes are concerned or very concerned about digital safety. Focus group participants noted experiences with identity and credit card theft. Survey respondents mention the following concerns:



Accessibility of Public Resources

31% of Finger Lakes residents rated past experiences with online government services as fair or poor. Focus groups highlighted language barriers and challenges navigating services that transitioned online during the pandemic.

In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B25002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

Long Island

The Long Island region has the highest median household income of any region in the state. In surveys and focus groups, residents shared concerns about their privacy and cybersecurity online and expressed that service quality varies greatly across eastern Suffolk County.



Digital Equity Act Covered Populations

Population	Long Island	NYS
Veterans	4%	4%
Aging Individuals	24%	23%
Low-income Households	10%	20%
Individuals with Language Barriers	20%	26%
Individuals with Disabilities	10%	12%
Rural Residents	2%	20%
Racial and Ethnic Minorities	36%	45%

Long Island Region Snapshot

2,914,700 people **959,100 households** **91%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$118,700 median household income

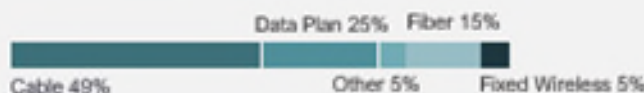
26% of households earning under **\$35k/year** do not have internet, while **13%** of households earning **\$35k-75k/year** do not have internet, and **4%** of households earning over **\$75k/year** do not have internet.

29% of eligible households enrolled in the Affordable Connectivity Program (60,400).

The median household spends **\$90-100/month** on internet, compared to **\$75-90/month** statewide.

Internet | Broadband Affordability & Availability

On Long Island, 3% of broadband-serviceable locations have internet speeds of at least 100/20 Mbps available (FCC). 9% of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



Devices | Accessibility of Devices & Device Support

5% of households lack a computer and 4% are smartphone-only internet subscribers (ACS). 5% of survey respondents said that their household does not have all the devices it needs. Residents used a variety of devices to access the internet at home at comparable rates.



Digital Literacy

Focus groups highlighted public computer labs in libraries and community centers as very helpful to digital literacy. Respondents were most confident in banking, learning, and applying for jobs online.



Privacy & Cybersecurity

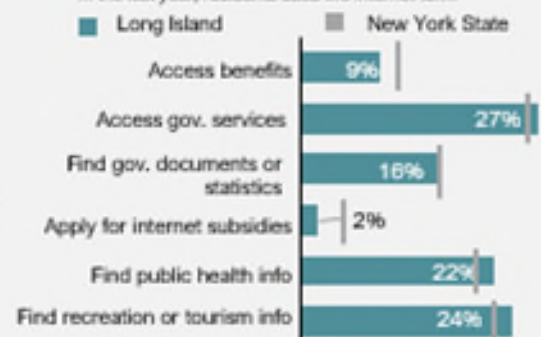
92% of residents on Long Island are concerned or very concerned about digital safety. Focus group participants noted that online scams were growing harder to identify. Survey respondents mentioned the following concerns:



Accessibility of Public Resources

28% of Long Island residents rated past experiences with online government services as fair or poor. Focus groups highlighted that local and NYS government online resources should be standardized for better accessibility.

In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B29002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet, Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

Mid-Hudson

The Mid-Hudson region has a larger share of rural residents than other regions. In focus groups, residents said they needed more reliable, affordable internet service options, and they requested an increase in the number and variety of community organizations offering free or low-cost digital literacy training and Wi-Fi.



Digital Equity Act Covered Populations

Population	Mid-Hudson	NYS
Veterans	4%	4%
Aging Individuals	22%	23%
Low-income Households	17%	20%
Individuals with Language Barriers	21%	26%
Individuals with Disabilities	12%	12%
Rural Residents	60%	20%
Racial and Ethnic Minorities	31%	45%

Mid-Hudson Region Snapshot

1,388,800 people **481,400 households** **88%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$87,300 median household income

28% of households earning under **\$35k/year** do not have internet, while **14%** of households earning **\$35k-75k/year** do not have internet, and **4%** of households earning over **\$75k/year** do not have internet.

42% of eligible households enrolled in the Affordable Connectivity Program (72,800).

The median household spends **\$85/month** on internet, compared to **\$75-90/month** statewide.

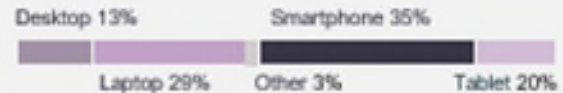
Internet | Broadband Affordability & Availability

In Mid-Hudson, 5% of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). 12% of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



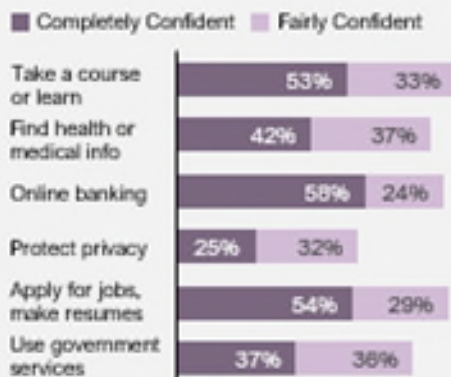
Devices | Accessibility of Devices & Device Support

8% of households lack a computer and 6% are smartphone-only internet subscribers (ACS). 8% of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups highlighted that training should be free and tailored to meet the needs of specific audiences. Residents were most confident in banking, learning, and applying for jobs online:



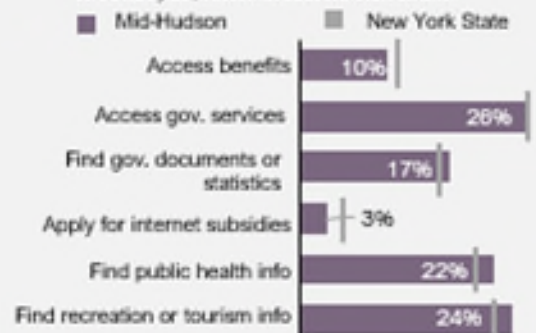
Privacy & Cybersecurity

89% of residents in Mid-Hudson are concerned or very concerned about digital safety. Focus group participants noted that more trainings for online safety are needed. Survey respondents mentioned the following concerns:



Accessibility of Public Resources

36% of Mid-Hudson residents rated past experiences with online government services as fair or poor. Focus group highlighted that public resources on phone applications were more user-friendly than websites on desktop computers. In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B28002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet, Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

Mohawk Valley

Mohawk Valley has larger shares of rural residents and aging individuals than other regions of the state. In focus groups, residents noted that internet options, especially bundled services, were too expensive. They recommended that discounts be offered to apartment-dwelling households.



Digital Equity Act Covered Populations

Population	Mohawk Valley	NYS
Veterans	7%	4%
Aging Individuals	26%	23%
Low-income Households	23%	20%
Individuals with Language Barriers	17%	26%
Individuals with Disabilities	16%	12%
Rural Residents	71%	20%
Racial and Ethnic Minorities	14%	45%

Mohawk Valley Region Snapshot

484,600 people **190,500 households** **84%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$60,000 median household income

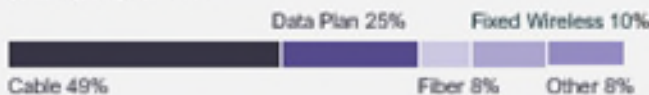
32% of households earning under **\$35k/year** do not have internet, while **13%** of households earning **\$35k-75k/year** do not have internet, and **6%** of households earning over **\$75k/year** do not have internet.

57% of eligible households enrolled in the Affordable Connectivity Program (62,900).

The median household spends **\$80-87/month** on internet, compared to **\$75-90/month** statewide.

Internet | Broadband Affordability & Availability

In the Mohawk Valley, 7% of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). 16% of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



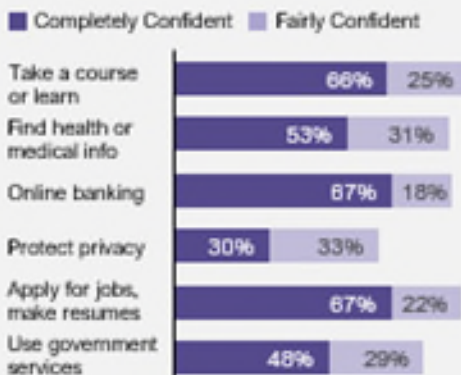
Devices | Accessibility of Devices & Device Support

10% of households lack a computer and 8% are smartphone-only internet subscribers (ACS). 8% of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus group participants wanted training to help them combat online scams. Respondents were most confident in learning, using government services, and banking online.



Privacy & Cybersecurity

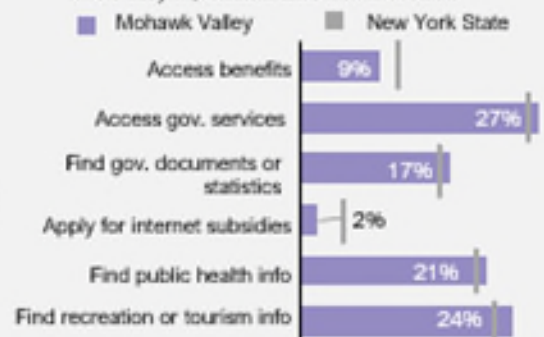
89% of residents in the Mohawk Valley are concerned or very concerned about digital safety. Focus group participants expressed a desire for the government to protect the public more from online scams. Survey respondents mentioned the following concerns:



Accessibility of Public Resources

35% of Mohawk Valley residents rated past experiences with online government services as fair or poor. Focus groups highlighted that they had issues navigating and understanding government websites.

In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B29002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

North Country

North Country has larger shares of rural residents, veterans, and aging individuals than other regions of the state. Focus groups expressed the need for centralizing online services and information and better targeting these resources to those with basic digital literacy. Residents also desired more affordable service provider options.



Digital Equity Act Covered Populations

Population	North Country	NYS
Veterans	8%	4%
Aging Individuals	23%	23%
Low-Income Households	23%	20%
Individuals with Language Barriers	16%	26%
Individuals with Disabilities	17%	12%
Rural Residents	95%	20%
Racial and Ethnic Minorities	12%	45%

North Country Region Snapshot

423,800 people **165,300 households** **85%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$58,200 median household income

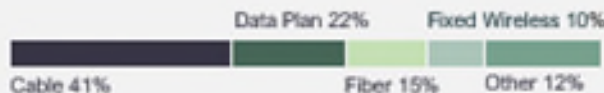
28% of households earning under **\$35k/year** do not have internet, while **14%** of households earning **\$35k-75k/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

45% of eligible households enrolled in the Affordable Connectivity Program (29,200).

The median household spends **\$80/month** on internet, compared to **\$75-90/month** statewide.

Internet | Broadband Affordability & Availability

In North Country, **12%** of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). **15%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



Devices | Accessibility of Devices & Device Support

9% of households lack a computer and **7%** are smartphone-only internet subscribers (ACS). **4%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus group participants noted fear of scams during certain activities. Respondents were most confident in learning, applying for jobs, and banking online.



Privacy & Cybersecurity

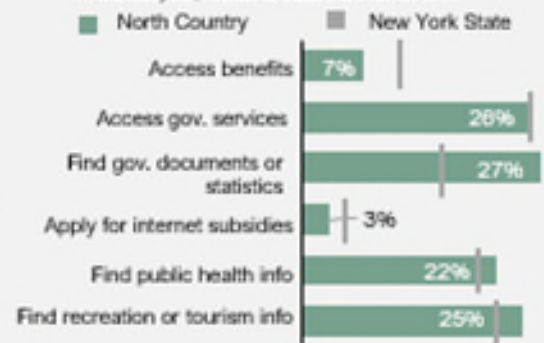
90% of residents in North Country are concerned or very concerned about digital safety. Focus group participants noted that centrally-located trainings for online safety would be helpful. Survey respondents mentioned the following concerns:



Accessibility of Public Resources

34% of North Country residents rated past experiences with online government services as fair or poor. Focus groups highlighted issues with fake government websites and a lack of website accessibility.

In the last year, residents used the internet to....



CITATIONS: All demographic and telecommunications data was sourced from the NYA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B29002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet, Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

New York City

New York City has the largest share of racial and ethnic minorities, low-income households, and individuals with language barriers of any region. Focus groups expressed that internet and devices are unaffordable and that home internet can be too unreliable and slow to meet everyday needs. Individuals with language barriers shared challenges they have accessing online public services.



Digital Equity Act Covered Populations

Population	New York City	NYS
Veterans	2%	4%
Aging Individuals	20%	23%
Low-Income Households	27%	20%
Individuals with Language Barriers	37%	26%
Individuals with Disabilities	11%	12%
Rural Residents	0%	20%
Racial and Ethnic Minorities	69%	45%

NYC Region Snapshot

8.7 million people **3.26 million households** **86%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$74,100 median household income

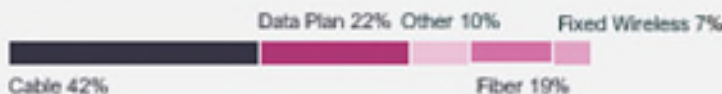
30% of households earning under **\$35k/year** do not have internet, while **13%** of households earning **\$35k-75k/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

41% of eligible households enrolled in the Affordable Connectivity Program (876K).

The median household spends **\$65-91/month** on internet, compared to **\$75-90/month** statewide.

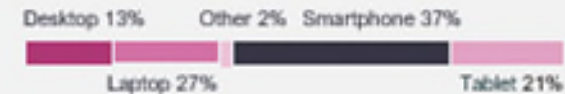
Internet | Broadband Affordability & Availability

In New York City, **1%** of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). **14%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



Devices | Accessibility of Devices & Device Support

8% of households lack a computer and **9%** are smartphone-only internet subscribers (ACS). **13%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups noted a lack of digital literacy resources that serve English language learners and minorities. They highlighted libraries as helpful resources and desired more training on accessing services that went online during the pandemic.



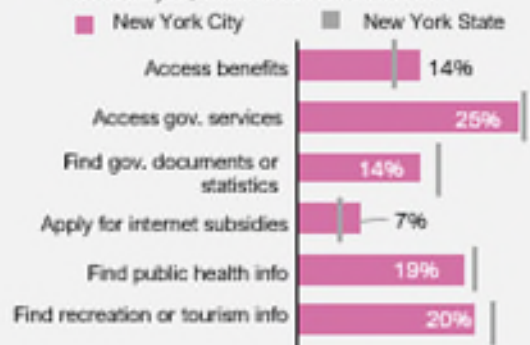
Privacy & Cybersecurity

84% of residents in New York City are concerned or very concerned about digital safety. Focus groups demonstrated a lack of digital skills drives fear of scams. Survey respondents mention the following concerns:



Accessibility of Public Resources

36% of residents rated past experiences with online government services as fair or poor. Focus groups highlighted challenges navigating online services, especially for aging individuals and individuals with disabilities or language barriers. In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B29002). Unless otherwise noted, other results on internet access come from survey and focus group data and a notesheet sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office. NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

NYC | The Bronx

The Bronx has the largest share of racial or ethnic minorities of any region, and it contains greater shares of low-income households and individuals with language barriers. Focus groups were concerned about the affordability and quality of internet and devices, with existing options both unaffordable or of insufficient quality for everyday needs.



Digital Equity Act Covered Populations

Population	The Bronx	NYS
Veterans	2%	4%
Aging Individuals	18%	23%
Low-income Households	39%	20%
Individuals with Language Barriers	48%	26%
Individuals with Disabilities	16%	12%
Rural Residents	0%	20%
Racial and Ethnic Minorities	92%	45%

The Bronx Region Snapshot

1,468,300 people **521,300** households **82%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$43,700 median household income

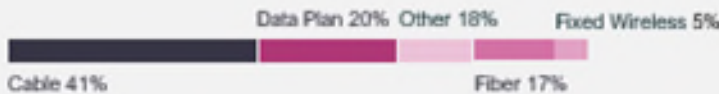
30% of households earning under **\$35k/year** do not have internet, while **12%** of households earning **\$35k-75k/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

52% of eligible households enrolled in the Affordable Connectivity Program (203,000).

The median household spends **\$70-120/month** on internet, compared to **\$75-90/month** statewide.

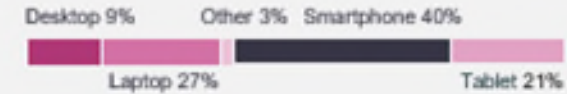
Internet | Broadband Affordability & Availability

In the Bronx, **3%** of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). **18%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



Devices | Accessibility of Devices & Device Support

9% of households lack a computer and **17%** are smartphone-only internet subscribers (ACS). **17%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups expressed desire for expanded training on online activities that began during the pandemic. Respondents were most confident in learning and applying for jobs / making resumes online.

■ Completely Confident ■ Fairly Confident



Privacy & Cybersecurity

82% of residents in the Bronx are concerned or very concerned about digital safety. Focus groups expressed concerns with a variety of cybersecurity issues, but especially with respect to the vulnerability of older adults. Survey respondents mention the following concerns:



Accessibility of Public Resources

33% of Bronx residents rated past experiences with online government services as fair or poor. Focus groups highlighted accessibility concerns with websites providing critical services, especially for seniors and individuals with disabilities.

In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B29002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

NYC | Brooklyn

Brooklyn has larger shares of racial or ethnic minorities, low-income households, and individuals with language barriers than other regions. Focus groups expressed a desire for better and more affordable internet service at home, particularly in neighborhoods perceived to be at risk of being left out of infrastructure deployment.



Digital Equity Act Covered Populations

Population	Brooklyn	NYS
Veterans	1%	4%
Aging Individuals	19%	23%
Low-income Households	30%	20%
Individuals with Language Barriers	37%	26%
Individuals with Disabilities	10%	12%
Rural Residents	0%	20%
Racial and Ethnic Minorities	64%	45%

Brooklyn Region Snapshot

2,712,400 people **985,100 households** **85%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$67,800 median household income

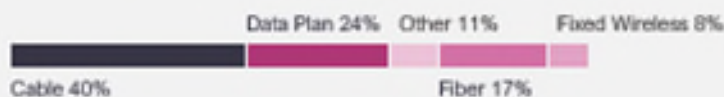
31% of households earning under **\$35k/year** do not have internet, while **14%** of households earning **\$35k-75k/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

42% of eligible households enrolled in the Affordable Connectivity Program (224,000).

The median household spends **\$70-91/month** on internet, compared to **\$75-90/month** statewide.

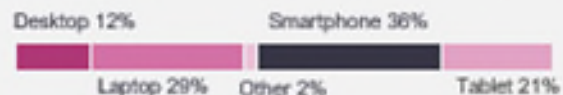
Internet | Broadband Affordability & Availability

In Brooklyn, 1.5% of broadband serviceable locations have internet speeds below 100/20 Mbps available (FCC). 15% of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



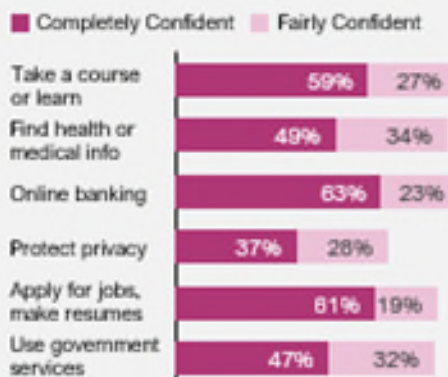
Devices | Accessibility of Devices & Device Support

10% of households lack a computer and 8% are smartphone-only internet subscribers (ACS). 9% of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups described uneven experiences with digital literacy, especially for those with limited English skills. Respondents were most confident in online banking and applying for jobs / making resumes.



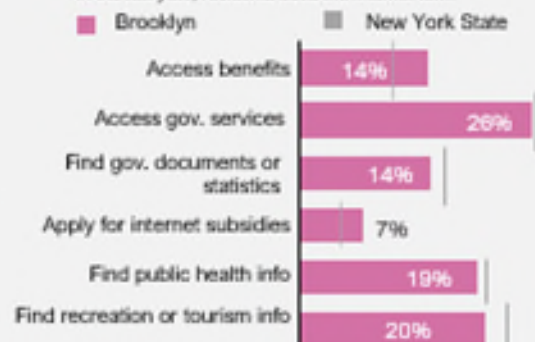
Privacy & Cybersecurity

87% of residents in Brooklyn are concerned or very concerned about digital safety. Focus groups were concerned about the security risks that older adults face online, noting a need for more training. Survey respondents mention the following concerns:



Accessibility of Public Resources

36% of Brooklyn residents rated past experiences with online government services as fair or poor. Focus group participants expressed that government sites are difficult to navigate, particularly for those with limited English skills. In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NYU/US Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B29002). Unless otherwise noted, other results on internet access come from survey and focus group data and a website sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office. NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median monthly costs second, when the costs are the same, one number is expressed. Under "Internet Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

NYC | Manhattan

Manhattan has larger shares of racial or ethnic minorities and low-income households than other regions of the state. Focus groups expressed concerns about the inconsistency of internet service quality and training programs across the city, especially for those struggling to afford service or with language barriers.



Digital Equity Act Covered Populations

Population	Manhattan	NYS
Veterans	2%	4%
Aging Individuals	22%	23%
Low-Income Households	22%	20%
Individuals with Language Barriers	27%	26%
Individuals with Disabilities	11%	12%
Rural Residents	0%	20%
Racial and Ethnic Minorities	53%	45%

Manhattan Region Snapshot

1,659,100 people **767,200 households** **89%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$94,000 median household income

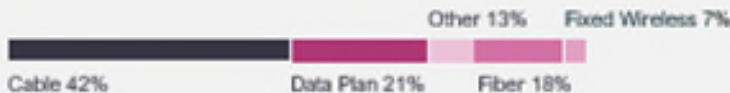
28% of households earning under **\$35k/year** do not have internet, while **12%** of households earning **\$35k-75k/year** do not have internet, and **3%** of households earning over **\$75k/year** do not have internet.

55% of eligible households enrolled in the Affordable Connectivity Program (167,200).

The median household spends **\$65-80/month** on internet, compared to **\$75-90/month** statewide.

Internet | Broadband Affordability & Availability

In Manhattan, all broadband serviceable locations have internet speeds above 100/20 Mbps available (FCC). **11%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



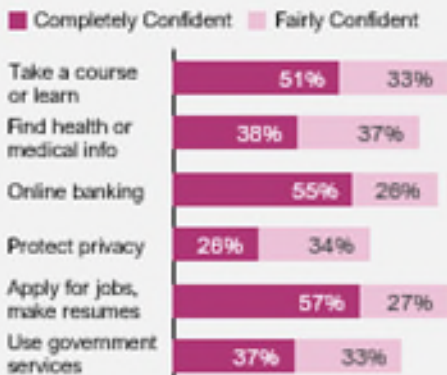
Devices | Accessibility of Devices & Device Support

7% of households lack a computer and **6%** are smartphone-only internet subscribers (ACS). **13%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus group participants expressed concerns over the availability of resources for English learners and people of color. Respondents were most confident in online banking and applying for jobs / making resumes.



Privacy & Cybersecurity

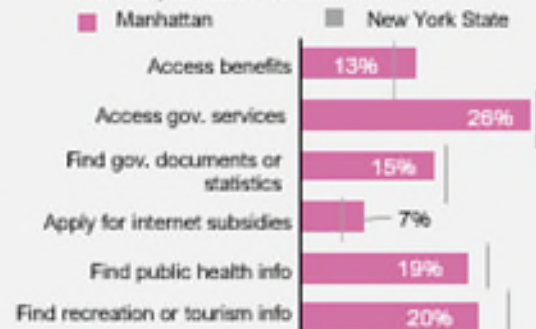
89% of residents in the Manhattan are concerned or very concerned about digital safety. Focus groups noted a lack of confidence in digital skills driving fear of scams and limiting usage of the internet. Survey respondents mention the following concerns:



Accessibility of Public Resources

39% of Manhattan residents rated past experiences with online government services as fair or poor. Focus groups were concerned about unequal access to resources, with vulnerable communities unaware of resources in their area.

In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B28002). Unless otherwise noted, other results on internet access come from survey and focus group data and a needs-based analysis sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office. NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

NYC | Queens

Queens has larger shares of racial or ethnic minorities and individuals with language barriers than other regions of the state. Focus groups highlighted barriers to using the internet, including high prices for unreliable home internet service and website accessibility concerns for older adults and people with language barriers.



Digital Equity Act Covered Populations

Population	Queens	NYS
Veterans	2%	4%
Aging Individuals	22%	23%
Low-income Households	21%	20%
Individuals with Language Barriers	41%	26%
Individuals with Disabilities	10%	12%
Rural Residents	0%	20%
Racial and Ethnic Minorities	76%	45%

Queens Region Snapshot

2,393,100 people **807,500 households** **88%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$75,900 median household income

26% of households earning under **\$35k/year** do not have internet, while **12%** of households earning **\$35k-75k/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

53% of eligible households enrolled in the Affordable Connectivity Program (167,200).

The median household spends **\$60-90/month** on internet, compared to **\$75-90/month** statewide.

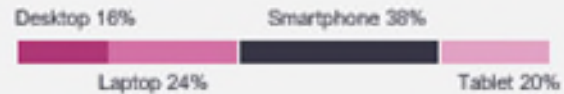
Internet | Broadband Affordability & Availability

In Queens, nearly all broadband serviceable locations have internet speeds of at least 100/20 Mbps available (FCC). **12%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



Devices | Accessibility of Devices & Device Support

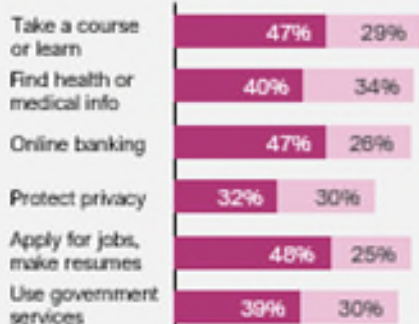
7% of households lack a computer and **10%** are smartphone-only internet subscribers (ACS). **15%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups noted libraries as good resources for learning computer skills. Respondents were most confident in learning online and least confident in protecting their privacy online.

■ Completely Confident ■ Fairly Confident



Privacy & Cybersecurity

80% of residents in Queens are concerned or very concerned about digital safety. Focus groups were concerned about online safety skills among both older adults and young people. Survey respondents mention the following concerns:

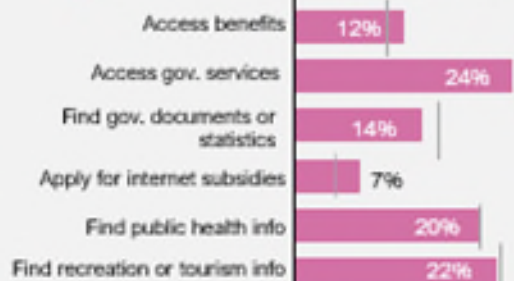


Accessibility of Public Resources

34% of Queens residents rated past experiences with online government services as fair or poor. Focus groups highlighted inconsistent navigability of government websites, particularly for individuals with disabilities or limited English skills.

In the last year, residents used the internet to...

■ Queens ■ New York State



CITATIONS: All demographic and telecommunications data was sourced from the NYA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B28002). Unless otherwise noted, other results on internet access come from survey and focus group data and analyses sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

NYC | Staten Island

Staten Island has smaller shares of covered populations than other regions. Low-income households within the region have a lower rate of adoption of internet than households with comparable incomes in other parts of the state. Survey respondents noted significant concerns over privacy and safety online.



Digital Equity Act Covered Populations

Population	Staten Island	NYS
Veterans	3%	4%
Aging Individuals	22%	23%
Low-income Households	17%	20%
Individuals with Language Barriers	24%	26%
Individuals with Disabilities	10%	12%
Rural Residents	0%	20%
Racial and Ethnic Minorities	39%	45%

Staten Island Region Snapshot

493,200 people **169,500 households** **86%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$89,400 median household income

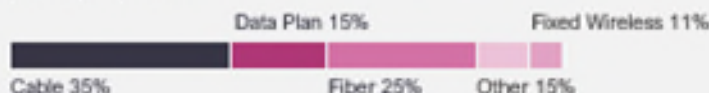
35% of households earning under **\$35k/year** do not have internet, while **16%** of households earning **\$35k-75k/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

56% of eligible households enrolled in the Affordable Connectivity Program (32,400).

The median household spends **\$63-100/month** on internet, compared to **\$75-90/month** statewide.

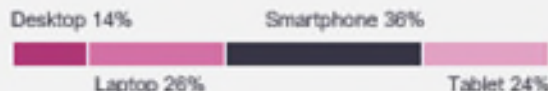
Internet | Broadband Affordability & Availability

On Staten Island, nearly all broadband serviceable locations have internet speeds of at least 100/20 Mbps available (FCC). **14%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



Devices | Accessibility of Devices & Device Support

7% of households lack a computer and **6%** are smartphone-only internet subscribers (ACS). **11%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



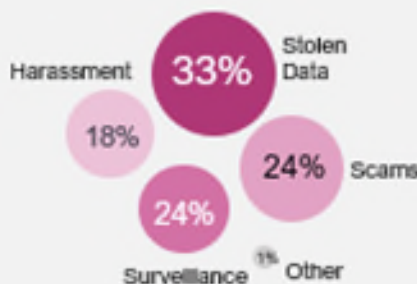
Digital Literacy

Respondents were most confident in online banking and least confident in protecting their privacy.



Privacy & Cybersecurity

83% of residents in Staten Island are concerned or very concerned about digital safety. Survey respondents mention the following concerns:



Accessibility of Public Resources

39% of Staten Island residents rated past experiences with online government services as fair or poor.



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B29002). Unless otherwise noted, other results on internet access come from survey and focus group data and a needs assessment sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

Southern Tier

The Southern Tier has larger shares of rural residents and individuals with disabilities than other regions of the state. Residents in focus groups desired more internet service provider options in the region. They recommended that public housing residents should have free internet.



Digital Equity Act Covered Populations

Population	Southern Tier	NYS
Veterans	7%	4%
Aging Individuals	26%	23%
Low-Income Households	23%	20%
Individuals with Language Barriers	15%	26%
Individuals with Disabilities	16%	12%
Rural Residents	85%	20%
Racial and Ethnic Minorities	13%	45%

Southern Tier Region Snapshot

641,400 people **262,900** households **85%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$57,900 median household income

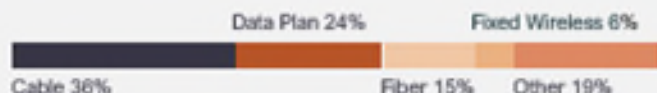
29% of households earning under **\$35k/year** do not have internet, while **13%** of households earning **\$35k-75k/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

42% of eligible households enrolled in the Affordable Connectivity Program (56,900).

The median household spends **\$79-80/month** on internet, compared to **\$75-90/month** statewide.

Internet | Broadband Affordability & Availability

In the Southern Tier, **8%** have internet speeds lower than 100/20 Mbps available (FCC). **15%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



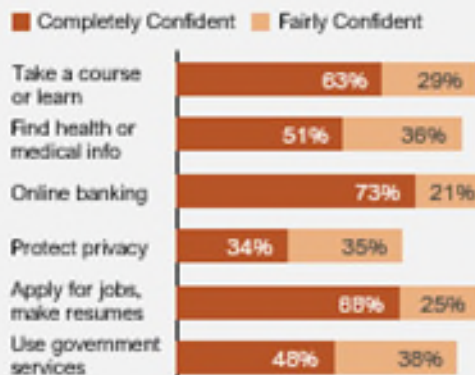
Devices | Accessibility of Devices & Device Support

9% of households lack a computer and **7%** are smartphone-only internet subscribers (ACS). **8%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



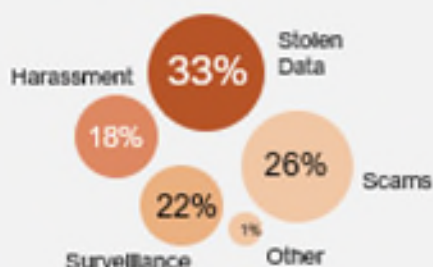
Digital Literacy

Focus groups highlighted turning to public libraries and resources for help learning digital skills. Respondents were most confident in banking and applying for jobs online.



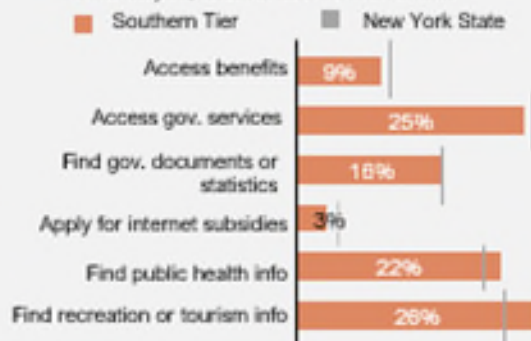
Privacy & Cybersecurity

87% of residents in the Southern Tier are concerned or very concerned about digital safety. Focus group participants noted discomfort entering their financial information online. Survey respondents mentioned the following concerns:



Accessibility of Public Resources

32% of Southern Tier residents rated past experiences with online government services as fair or poor. Focus groups highlighted challenges completing forms on smartphones and understanding language and jargon used online. In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B25002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

Westchester County

Westchester County has the second highest median income in the state. In focus groups, residents wanted more internet service providers as well as service options that better support households where multiple people use the internet at once. Residents noted that awareness of ACP needed to increase.



Digital Equity Act Covered Populations

Population	Westchester	NYS
Veterans	3%	4%
Aging Individuals	23%	23%
Low-income Households	14%	20%
Individuals with Language Barriers	24%	26%
Individuals with Disabilities	10%	12%
Rural Residents	3%	20%
Racial and Ethnic Minorities	47%	45%

Westchester County Region Snapshot

999,700 people **364,400 households** **90%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$105,400 median household income

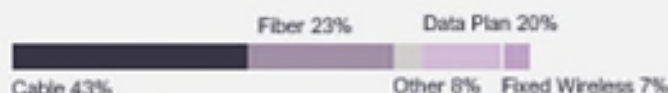
28% of households earning under **\$35k/year** do not have internet, while **14%** of households earning **\$35k-75k/year** do not have internet, and **4%** of households earning over **\$75k/year** do not have internet.

34% of eligible households enrolled in the Affordable Connectivity Program (36,000).

The median household spends **\$80-100/month** on internet, compared to **\$75-90/month** statewide.

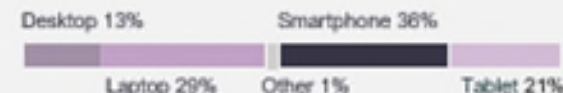
Internet | Broadband Affordability & Availability

In Westchester, **8%** of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). **10%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



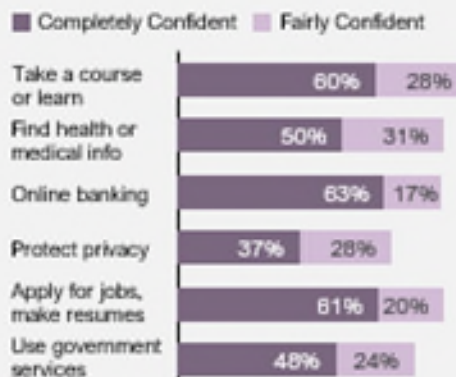
Devices | Accessibility of Devices & Device Support

6% of households lack a computer and **6%** are smartphone-only internet subscribers (ACS). **8%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Residents were most confident in banking and applying for jobs / making resumes online. Westchester survey respondents were more confident in online banking than other parts of the state.



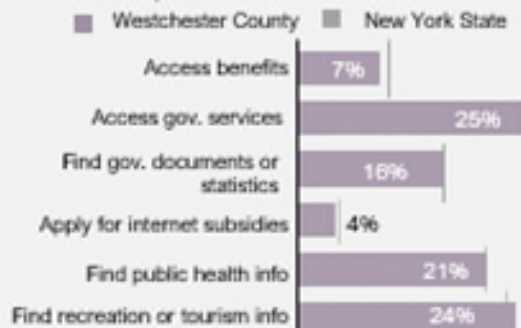
Privacy & Cybersecurity

89% of residents in the Westchester are concerned or very concerned about digital safety. However, focus group participants said were generally able to identify email scams. Survey respondents noted the following concerns:



Accessibility of Public Resources

31% of Westchester residents rated past experiences with online government services as fair or poor. Focus groups highlighted how easy it is to find information about restaurants or things to do, while some struggled with language barriers. In the last year, residents used the internet to...

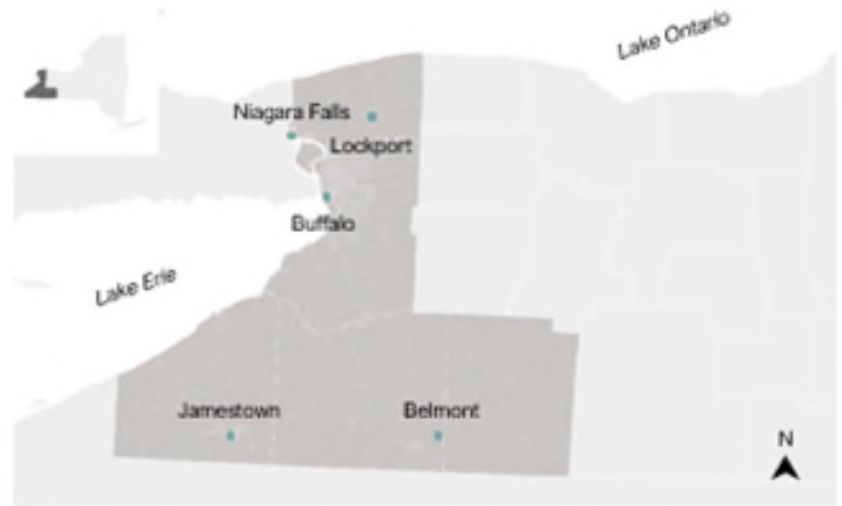


CITATIONS: All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American-Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B28002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office. NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

NYS REGIONAL SNAPSHOTS

Western New York

Western New York has a larger share of individuals with disabilities than other regions. In focus groups, residents needed more alternatives to DSL and satellite, which they said tend to be expensive. They reported periodic increases to internet prices and advertising that prioritizes expensive, bundled service options.



Digital Equity Act Covered Populations

Population	Western NY	NYS
Veterans	6%	4%
Aging Individuals	25%	23%
Low-income Households	22%	20%
Individuals with language barriers	16%	26%
Individuals with Disabilities	14%	12%
Rural Residents	29%	20%
Racial and Ethnic Minorities	20%	45%

Western New York Region Snapshot

1,414,400 people **594,100 households** **85%** of households have any type of broadband internet, compared to **87%** in NYS (ACS).

\$60,500 median household income

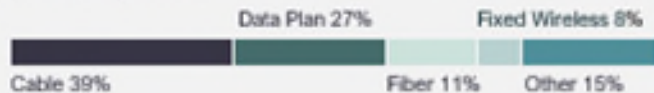
31% of households earning under **\$35k/year** do not have internet, while **13%** of households earning **\$35k-75k/year** do not have internet, and **5%** of households earning over **\$75k/year** do not have internet.

50% of eligible households enrolled in the Affordable Connectivity Program (138,600).

The median household spends **\$70-80/month** on internet, compared to **\$75-90/month** statewide.

Internet | Broadband Affordability & Availability

In Western New York, **3%** of broadband serviceable locations have internet speeds lower than 100/20 Mbps available (FCC). **15%** of households do not have any type of broadband internet (ACS). Among households that do have internet access, surveyed respondents primarily rely on cable.



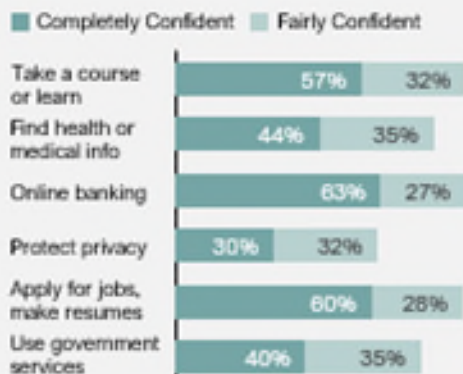
Devices | Accessibility of Devices & Device Support

10% of households lack a computer and **8%** are smartphone-only internet subscribers (ACS). **9%** of survey respondents said that their household does not have all the devices it needs. When asked what device they used most often for internet at home, respondents most often said smartphones.



Digital Literacy

Focus groups highlighted the need for more training in online safety. Respondents were most confident in banking and applying for jobs / making resumes online.



Privacy & Cybersecurity

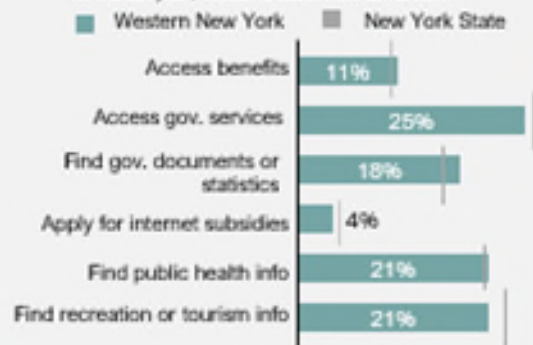
90% of residents in Western New York are concerned about digital safety. Focus group participants felt that more training would be helpful for maintaining their safety online. Survey respondents mentioned the following concerns:



Accessibility of Public Resources

38% of Western New York residents rated past experiences with online government services as fair or poor. Focus groups highlighted challenges with online services like social security, health insurance, and public health information.

In the last year, residents used the internet to...



CITATIONS: All demographic and telecommunications data was sourced from the NYA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS) 2017-2021 5-Year Series, and the FCC Broadband database. ACS refers to the following as "broadband at home": cellular data plan, cable, fiber optic, satellite, or DSL (Table B29002). Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.
NOTE: Monthly internet bill data expresses median unbundled plan costs first and bundled (i.e., internet packaged with cable TV) median plan costs second, when the costs are the same, one number is expressed. Under "Internet: Availability & Affordability," "Other" includes community Wi-Fi, dial-up, DSL, and satellite internet.

3.2.2.1 Regional Snapshots Notes

Sources

- All demographic and telecommunications data was sourced from the NTIA/U.S. Census Digital Equity Act Population Viewer, the U.S. Census American Community Survey (ACS 2017-2021 5-Year Series), and the FCC Broadband database.
- ACP data for statewide enrollment current as of October 30, 2023; ACP data on enrollment by county current as of August 2023. ACP data is from Universal Service Administrative Co. (USAC).
- ACS refers to the following as “broadband at home”: cellular data plan, cable, fiber optic, satellite, or DSL (Table B28002).
- Unless otherwise noted, other results on internet access come from survey and focus group data and anecdotes sourced from stakeholder engagement efforts conducted in 2023 by the NYS ConnectALL Office.

Notes

- Monthly internet bill data states median **unbundled** plan costs first and **bundled** (i.e., internet packaged with cable TV) median plan costs second; when the costs are the same, one number is expressed. Monthly internet bill data comes from the survey.
- Under “Internet: Availability & Affordability,” “Other” includes community Wi-Fi, dial-up, DSL, and satellite internet.

Survey Questions

Internet | Broadband Availability and Affordability

If you have internet service in your home, what kind is it? (Select all that apply)

- a. A data plan for a smartphone, hotspot, or tablet
- b. Cable internet
- c. Fiber optic internet
- d. DSL internet
- e. Fixed wireless internet
- f. Satellite internet
- g. Dial-up internet
- h. Community Wi-Fi (such as free Wi-Fi provided by a community organization)
- i. I don't know

Internet | Devices

Which of the following devices do you use most of the time to connect to the internet? (Select all that apply)

- a. Cell phone

- b. Desktop computer
- c. Laptop computer
- d. Tablet (or similar device)
- e. I don't know
- f. I don't have a device that can connect to the internet
- g. Other (please specify) _____

Digital Confidence

How confident do you feel with doing the following activities online?

(Completely confident / Fairly confident / Slightly confident / Not confident)

- a. Search for and apply for jobs, including creating and submitting a resume
- b. Find trustworthy information about a health or medical question
- c. Take a course or find learning materials
- d. Access online banking or financial services
- e. Access or apply for government services
- f. Use a video chat service, such as Zoom, for work, school, or telehealth
- g. Use a word processing application, such as Google Docs or Microsoft Word, to create a document
- h. Find ways to protect the privacy of your personal data
- i. Use email
- j. Use social media
- k. Online shopping

Online Privacy & Security

What are you most concerned about?

(Select all that apply)

- a. That my data could get stolen or used without my consent
- b. That I or a loved one could get scammed or tricked
- c. That I could be tracked or surveilled
- d. That I or a loved one could be harassed or abused online
- e. Other (please specify)

Use of Online Public Benefits

In the past year, have you used the internet to do any of the following?

(Select all that apply)

- a. Find information about government services or resources (e.g., voter registration, DMV, property information/building permits)
- b. Search for government statistics or documents

- c. Access recreational or tourist information (e.g., information about visiting state parks or cities)
- d. Find information about public health issues
- e. Apply for or manage government benefits (e.g., SNAP, TANF, Social Security)
- f. Enroll in Internet subsidy programs (e.g., Affordable Connectivity Program)

3.2.3 Digital Equity Needs, Barriers, and Assets Gap Analysis

To inform program design and funding strategies in alignment with the State’s Measurable Objectives (outlined in **Chapter 2.4.2 The Five Measurable Objectives**), the State synthesized findings regarding the needs of covered populations within each measurable objective category. This process allowed the State to compare needs against Assets already working to advance digital equity and strategically close remaining gaps in service, as well as to identify where additional resources may be needed.

3.2.3.1 Broadband Affordability & Availability

New Yorkers belonging to covered populations have less access to high-speed internet at home and are more likely to struggle to afford high-speed, reliable internet at home. A lack of choice among ISPs, costly bundled service packages, and a lack of awareness of the ACP also contribute to lower affordability.

A diverse set of assets operate programs to close these gaps: expanding broadband access among covered populations, advocating for greater consumer choice, and helping New Yorkers access the ACP subsidy.

Table 4: Broadband Affordability & Availability Gap Analysis

Need	Sample Assets and Programs	Measurable Objective
<p>Covered populations, especially in low-income and rural communities, report lower rates of access to broadband internet connection.</p> <ul style="list-style-type: none"> • 7% of New Yorkers do not have broadband of any type at home (Survey). • 14% of low-income households and 6% of rural households do not have broadband of any type at home (Survey). 	<p>Organizations including but not limited to Adirondack North Country Association, OEConnect, and the Hope Program currently work to increase broadband access for rural and low-income New Yorkers by highlighting areas of high need, assisting household enrollment in ACP, and providing household support for internet service technology.</p>	<p>Increase the number of households statewide with broadband internet connections at home, especially for those residing in affordable housing units or in rural areas.</p>

Need	Sample Assets and Programs	Measurable Objective
<p>New Yorkers are concerned about a lack of choice among ISPs, leading to lower quality of service at higher prices.</p> <p><i>Quotation from a focus group from the Finger Lakes region:</i></p> <p><i>“Trying to figure out now, do we want to keep it or not? Is there something else we can use?... We pay \$180. We only use it for TV and internet.”</i></p>	<p>Organizations including but not limited to public libraries statewide, Community Tech NY, LinkNYC, and Nichols Fiber are providing alternatives to traditional internet service and offering public internet alternatives.</p>	<p>Increase the share of locations in each region that have more than one ISP or alternative option, particularly in regions with higher concentrations of covered populations.</p>

Need	Sample Assets and Programs	Measurable Objective
<p>Service bundling, which combines internet service with other subscriptions such as cable television, is a challenge for consumers seeking to minimize the cost of broadband service; if the price goes up on long-term bundled plans and customers can no longer pay, this can also affect eligibility for subsidized plans, including ACP.</p> <ul style="list-style-type: none"> • According to the Survey, the median household bundled internet monthly service cost was \$90/month; the median household unbundled internet monthly service cost was only \$75/month.⁵⁶ <p><i>Quotation from a focus group from Long Island: “Participants indicated that the internet service providers sell services in bundled packages, making it impossible to access affordable basic internet service separate from entertainment packages for various television channels.”</i></p>	<p>Organizations including but not limited to the Benton Institute for Broadband & Society, OLA of Eastern Long Island, and the Western New York Digital Equity Coalition raise awareness, publish studies, and advocate for policy changes to increase consumer choice and mitigate the higher costs associated with bundled service packages.</p>	<p>Increase the share of locations in each region that have options for unbundled, affordable broadband service.</p>

⁵⁶ Analysis relies on self-reported cost data from New York State Internet Access Survey and excludes outliers.

Need	Sample Assets and Programs	Measurable Objective
<p>Many eligible New Yorkers are not aware of the ACP subsidy, and some New Yorkers who are aware of the subsidy cannot or do not use it.</p> <ul style="list-style-type: none"> 48% of eligible households statewide (1.28 million) were enrolled in ACP as of September 2023. <p><i>Quotation from a focus group from the Finger Lakes:</i></p> <p><i>“There was an FCC Lifeline Program... A lot of people are not aware of these discounts. My godmother was able to get it simply based on zip code — I don’t know how many people are aware. I was not.”</i></p>	<p>Organizations including but not limited to the Broome County Office for the Aging, Computers 4 People, and Education Superhighway work to promote ACP awareness, assist households enrolling in the subsidy, and advocate for the continuation of internet cost assistance amongst other activities.</p>	<p>Increase awareness and adoption of affordability programs.</p>

3.2.3.2 Accessibility of Devices and Device Support

New Yorkers among covered populations are less likely to have internet-enabled devices at home, and individuals with disabilities face challenges in accessing devices that meet their needs. Many New Yorkers struggle to maintain, update, and resolve technical issues with the devices they do have, and few safely dispose of devices they no longer need.

A diverse set of assets statewide operate programs to close these gaps, including programs to lend or permanently give away free devices, provide technical support with devices at home, offer classes and training on how to use devices, and refurbishment programs to keep older but functional devices in circulation. Some assets provide specialized support to individuals with disabilities, including specialized device distribution programs that deliver assistive technology and specialized training on how to use assistive technology.

Table 5: Accessibility of Devices and Device Support Gap Analysis

Need	Existing Assets	Measurable Objective
<p>Covered populations, especially in low-income communities, are less likely to have internet-enabled devices at home.</p> <ul style="list-style-type: none"> • 9% of New Yorkers reported lacking sufficient internet-enabled devices in their homes. • Low-income households are 20% less likely than other New Yorkers to access the internet through a laptop, and 7% less likely to do so through a desktop. 	<p>Organizations including but not limited to public libraries statewide, Community Action Programs Cayuga/Seneca, and On Point for College offer device-lending programs, initiatives for obtaining free devices, and assistance with device use and connectivity at home.</p>	<p>Increase the number of New York households that have internet-enabled devices at home, especially among low-income communities.</p>
<p>Individuals with disabilities face challenges accessing and utilizing the internet-enabled devices they need.</p> <ul style="list-style-type: none"> • Individuals with disabilities are 7% more likely to live in homes without a laptop, and their specialized device needs include assistive technology such as screen readers and voice-to-text accessories. • Focus group participants criticized the “one size fits most” approach that results in many devices being inaccessible to those with disabilities. 	<p>Organizations including but not limited to the Viscardi Center, TechKids Unlimited, and Elizabeth B. Pert Reading Center offer accessibility compliance services, targeted computer skills classes for youth with disabilities, access to assistive technology on-site as well as through device loaning initiatives, and other programs.</p>	<p>Increase access to assistive technology that meets the needs of people with disabilities.</p>

Need	Existing Assets	Measurable Objective
<p>Many New Yorkers struggle to maintain, troubleshoot errors with, or make updates to their internet-enabled devices.</p> <ul style="list-style-type: none"> ▪ 34% of New Yorkers reported recently being able to fix a device on their own when it stopped working. ▪ 29% of New Yorkers reported not being able to fix a device on their own or with any other resources, such as device technical support, friends and family, online resources, or local experts or community resources. ▪ 79% of New Yorkers reported relying on friends, family, tech support, or other sources of assistance when their devices stopped working properly. <p><i>Quotation from a focus group from the Finger Lakes region:</i></p> <p><i>“It’s one thing to train people on all this, but most of us learn through frequency and repetition. It requires one-on-one [support]... [We] need to create a culture of internet support and companionship...”</i></p>	<p>Organizations including but not limited to the Albany Housing Authority, SUNY Ulster, and the various public libraries offer device training sessions, computer classes for continuing education credits, and assistance through trained staff members, among other programs to support device usage.</p>	<p>Decrease the number of New Yorkers reporting challenges maintaining or troubleshooting their own devices.</p>

Need	Existing Assets	Measurable Objective
Many New Yorkers are not aware of how to properly dispose of devices when upgrading to newer technologies.	Organizations including Mission: Ignite, Mohawk Valley Community College, and Shift2 offer refurbishment and redistribution of devices, new software installations to keep up with advancing technology, and e-waste collection.	Increase options for proper device disposal, recycling, and refurbishment.

3.2.3.3 Digital Literacy

New Yorkers among covered populations are generally less likely to feel confident in digital literacy, and certain New Yorkers—including incarcerated individuals, racial and ethnic minorities, and New Yorkers with language barriers—struggle to make use of the digital literacy programming that is already provided in the state. A lack of standards for digital literacy programming, including standards aligned with industry needs, make it more difficult for existing programming to scale to meet the needs of New Yorkers, employers, and educational institutions.

A diverse set of assets statewide operate programs to provide digital literacy training and coaching, increase the accessibility of training and coaching, and establish standards that will enable these programs to better serve more New Yorkers. Certain assets intentionally target covered populations that would struggle to access programming by bringing the programming to where covered populations live and making support available after work hours and during weekends.

Table 6: Digital Literacy Gap Analysis

Need	Existing Assets	Measurable Objective
<p>Covered populations—especially aging, incarcerated individuals, low-income households, individuals with language barriers, and individuals with disabilities—report lower confidence in digital literacy than other New Yorkers.</p> <p>13% of New Yorkers struggle to use the internet to meet their needs; covered populations are all more likely to struggle:</p> <ul style="list-style-type: none"> • 28% of individuals with language barriers; • 23% of veterans; • 21% of individuals with disabilities; • 19% of aging individuals; • 19% of low-income households. 	<p>Organizations including but not limited to public libraries, the Hispanic Federation, Older Adults Technology Services, and the End New Jim Crow Action Network offer one-to-many digital literacy classes, one-on-one skills coaching, and freely accessible curriculum materials to help New Yorkers build their digital literacy.</p>	<p>Increase New Yorkers’ awareness of available digital literacy programs.</p>
<p>Covered populations—especially formerly incarcerated New Yorkers, racial and ethnic minorities, and individuals with language barriers—lack adequate access to digital literacy programming.</p> <ul style="list-style-type: none"> • While in jail or prison, incarcerated individuals do not have access to training on internet or device usage. Focus group participants also noted that existing digital literacy programming is not as accessible to those with language barriers. <p><i>Quotation from a focus group from the Mid-Hudson region:</i></p>	<p>Organizations including but not limited to public libraries statewide, Thrive Collective, and Catholic Charities of Cortland County support formerly incarcerated individuals with digital skill building, plan weekend programming for diverse audiences, and organize digital navigation trainings and other digital literacy programming.</p>	<p>Increase covered populations’ access to digital literacy programming aligned to their specific needs and interests.</p>

Need	Existing Assets	Measurable Objective
<p><i>“Free computer classes have to be during the night because most of them are during the day while people are working, or on Saturday.”</i></p>		
<p>Providers of digital literacy programs frequently raised a lack of consistent curricula and training standards that align with industry standards as barriers to effectively scaling their work.</p> <ul style="list-style-type: none"> Participants of the DETF Workforce Development Town Hall expressed the need for improved coordination and data-sharing between workforce development organizations to provide a clearer picture of available training programs, as well as the need for improved marketing and outreach strategies to promote awareness of available programs and resources. 	<p>Organizations including but not limited to BOCES, Literacy Partners, and Silicon Harlem work to develop standards for digital literacy programming, promote useful planning materials for skills trainings, and support organizations with curriculum development.</p>	<p>Increase coordination among training providers.</p>

3.2.3.4 Privacy & Cybersecurity

Almost all New Yorkers are concerned about their online safety and privacy online, citing concerns about the security of their data and vulnerability to scams and surveillance.

Assets across the state operate programs focused on giving New Yorkers the skills and technology to be more secure and private online. Programs include digital literacy programming and materials focused on personal cybersecurity best practices and offerings to test and monitor hardware and equipment to identify vulnerabilities.

Table 7: Privacy & Cybersecurity Gap Analysis

Need	Existing Assets	Measurable Objective
<p>New Yorkers universally report concern about stolen data, scams, and surveillance online.</p> <ul style="list-style-type: none"> 87% of New Yorkers are either somewhat concerned or very concerned about their online safety. 	<p>Organizations including but not limited to the Knowb4, Adirondack Techs, FEARLESS of the Hudson Valley, and public libraries offer cyber security courses, monitoring of hardware and equipment to protect it from viruses or hacking, distribution of digital safety checklists or scam prevention materials, and other programs.</p>	<p>Increase the number of assets providing privacy & cybersecurity training to New Yorkers, especially to members of covered populations.</p>

3.2.3.5 Accessibility & Inclusivity of Public Resources

New Yorkers struggle to access public resources online due to navigational issues, the use of inaccessible language, and the inconsistency of accessibility offerings. Certain covered populations—namely individuals with disabilities, individuals with language barriers, and residents of rural communities—struggle the most with accessing public resources online.

Assets across the state work to close this gap by promoting accessibility standards and best practices and advocating for their adoption, as well as providing courses and materials to help New Yorkers, including members of covered populations that struggle most to access online government resources.

Table 8: Accessibility & Inclusivity of Public Resources Gap Analysis

Need	Existing Assets	Measurable Objective
<p>Collaborate on the design and implementation of universal accessibility standards across State government websites.</p> <ul style="list-style-type: none"> Focus groups conveyed that government websites are hard to navigate, include inaccessible language like government jargon, and do not consistently offer non-English language options, all of which hinders the ability to apply for benefits or services. One participant stated that many public resources online are not user-friendly for those with disabilities; specifically, the blind, visually impaired, deaf, hearing-impaired, cognitively impaired, and ESL community members: <i>“Are websites truly ADA accessible? Overall, no.”</i> 	<p>Organizations including but not limited to NY Metro InfraGard, Literacy Partners, and the Viscardi Center promote accessibility standards and industry practices, review the quality of online public resources, and advocate to improve the accessibility of government resources online.</p>	<p>Improve the quality and consistency of online public resources.</p>

Need	Existing Assets	Measurable Objective
<p>Covered populations are less likely to interact with online public resources.</p> <ul style="list-style-type: none"> ▪ Individuals with disabilities were 10% more likely than others to report online public services as either not very or not at all accessible. ▪ New Yorkers with language barriers were 22% less likely to do so. 	<p>Organizations including but not limited to Ulster County Citizens Committee on Digital Inclusion, Midtown Utica Community Center, and Rise Up Kingston publish information on navigating government resources in multiple languages, provide digital accessibility training for staff members, and run advocacy campaigns for improving access in covered populations.</p>	<p>Develop outreach campaigns to increase covered populations' trust in online public resources.</p>

4.0

Stakeholder Engagement

4.0 Stakeholder Engagement

Comprehensive stakeholder engagement is a key component of ConnectALL's (ConnectALL) digital equity planning. By leveraging and strengthening an already well-developed ecosystem of broadband and digital equity partnerships and working in collaboration with intergovernmental partners, established community-based organizations and service providers, the private sector, and representatives of covered populations, ConnectALL has built a State Digital Equity Plan (SDEP) that is community-informed. ConnectALL has also ensured that its parallel planning for the Broadband, Equity, Access, and Deployment (BEAD) Program is driven by digital equity. The engagement plan leverages existing relationships, builds new partnerships between New York State government agencies and between government and community, and will provide capacity and resources for new partnerships among community and service providers. Specifically, ConnectALL's strengthened relationships with Digital Equity and Inclusion Coalitions and regional entities has enabled the Office to gather data that is representative of the needs and assets of all regions in the state, leading to a plan reflecting this regional and participatory approach. Continuing to develop capacity and leadership of regional coalitions will remain a priority and strengthen the implementation of ConnectALL's broadband and digital equity infrastructure plans.

ConnectALL's multifaceted stakeholder engagement strategy reflects the exceptional diversity of New York State residents and leverages the state's mature ecosystem of broadband and digital equity stakeholders. The strategy includes comprehensive public engagement to ensure:

- Full geographic coverage
- Diverse stakeholders
- Awareness, outreach, and participation
- Transparency, and
- Targeted engagement for underrepresented communities.

In addition to addressing all the engagement approaches detailed below, ConnectALL utilized the core principles that structure the office's broader planning and development work to guide stakeholder engagement:

- **Equity:** Improved access to the internet, digital literacy, and devices will allow all New York residents to fully participate in our society, democracy, and economy.
- **Performance:** All New York residents should have access to high-quality connections, fast speeds, and reliable service.
- **Choice:** All New York residents should have a choice of internet providers, plans, and modes of digital engagement.
- **Affordability:** Quality service should be available at prices that all New York residents can afford.
- **Safety:** New York's online environments should ensure privacy, security, and digital well-being.

Forging successful partnerships with governmental and nongovernmental stakeholders to close the digital divide has been a guiding principle of ConnectALL since its creation. Outreach and engagement have been both thoughtful and intentional, and as a result, the State puts forth a truly inclusive broadband access and adoption strategy for the benefit of all New Yorkers.

4.1 Engagement Methods

ConnectALL led, co-hosted, or instigated a variety of events and data collection campaigns to gather input from key constituencies towards the ConnectALL planning process. ConnectALL took this approach to empower local coalitions and covered populations to drive the collection of inputs based on their knowledge of their communities, as opposed to a top-down approach.

An overview of these engagements is provided in the table below. A short description of each engagement type follows the Crosswalk. For more details on each engagement, including a full list of organizations with which ConnectALL collaborated in developing the Plan, see *SDEP Appendices*.

Table 9: Crosswalk of Stakeholders and Engagement Methods

	Broadband Deployment Advisory Committee	Digital Equity Task Force	New York State Internet Access Survey	Industry and Stakeholder Forums	Tribal Nation Engagement	Market Sounding and Interviews	Engagement of Incarcerated Individuals	Counties, Municipalities, and Regional Planning Council Interviews	Digital Equity Listening Sessions	Digital Equity Focus Groups	Regional Data Gathering
	Statewide Engagement						Regional Engagement & Participatory Planning				
Local, County, and Regional Government Entities				X		X		X	X		X
State Agencies	X	X			X				X		X
Tribal Leadership	X				X				X		X
ISPs and Other Private Partners	X			X		X			X		
Utilities						X			X		
Affordable Housing Property Owners	X					X			X		

	Broadband Deployment Advisory Committee	Digital Equity Task Force	New York State Internet Access Survey	Industry and Stakeholder Forums	Tribal Nation Engagement	Market Sounding and Interviews	Engagement of Incarcerated Individuals	Counties, Municipalities, and Regional Planning Council Interviews	Digital Equity Listening Sessions	Digital Equity Focus Groups	Regional Data Gathering
	Statewide Engagement					Regional Engagement & Participatory Planning					
Large Employers				X		X			X		
Affordable Housing Residents									X		X
Small Businesses						X			X		
Marginalized & Covered Populations		X			X		X		X	X	X
Digital Equity Coalitions		X					X		X	X	X
Libraries and Community Anchor Institutions		X		X					X		X

	Broadband Deployment Advisory Committee	Digital Equity Task Force	New York State Internet Access Survey	Industry and Stakeholder Forums	Tribal Nation Engagement	Market Sounding and Interviews	Engagement of Incarcerated Individuals	Counties, Municipalities, and Regional Planning Council Interviews	Digital Equity Listening Sessions	Digital Equity Focus Groups	Regional Data Gathering
	Statewide Engagement					Regional Engagement & Participatory Planning					
Regional Planning/Economic Development Organizations						X		X	X		X
Education, Health, Housing, Workforce, Labor, Civil Rights Organizations	X	X		X					X	X	X
Nonprofits and Community-Based Organizations		X					X		X	X	X

4.2 Statewide Engagement

4.2.1 Broadband Deployment Advisory Committee

In April 2022 the New York State Legislature passed the New York State WIRED Act, legislatively creating the Broadband Deployment Advisory Committee (BDAC). The BDAC is to be led by ConnectALL and the Office of Governor and advise on ConnectALL program design/implementation and policy changes to promote broadband expansion and development, intergovernmental cooperation and partnership with the private sector, issues and policies related to increasing consumer choice, industry competition, open-access deployment, wireless and cellular deployments, and updates to the Department of Public Service's annual broadband reports. The BDAC has 16 members, four appointed by the Governor serving three-year terms, and State Agency representatives from the departments of Public Service, Labor, Transportation, General Services, Economic Development, Homeland Security and Emergency Services, Housing and Community Renewal, Education, and Budget, as well as the New York Power Authority, the New York State Senate, and the New York State Assembly. There is also to be representatives from telecommunications unions, Tribal affairs, and Internet Service Providers.

4.2.2 Digital Equity Task Force

Shortly following the formation of the office, ConnectALL solidified a partnership with the New York State Library (NYSL) to co-convene an interagency Digital Equity Working Group (DEWG), leveraging NYSL's existing expertise and longtime involvement in the digital equity space. With the DEWG, ConnectALL solicited planning feedback, obtained information on existing State programs and resources, and identified partners to support digital equity planning and program implementation. In Spring 2023, ConnectALL and NYSL officially transitioned the DEWG to a more formal Digital Equity Task Force (DETF), with subcommittees focused on five key outcome areas: **education, health, economic and workforce development, civic and social engagement, and delivery of government services**. The transition from the DEWG to the DETF organized State agency partners, community institutions, private partners, and covered populations around the measurable objectives and key outcome areas and solidified coordination among State agencies and partnerships between the State and external partners on digital equity programs. Each DETF subcommittee was co-chaired by a state agency representative and external experts in the outcome area. See *SDEP Appendices* for details on each Task Force meeting held thus far.

ConnectALL held public Town Hall meetings for each DETF subcommittee, convening more than 550 key stakeholders, subject-matter experts, and members of the general public to discuss issues related to each outcome area and provide targeted input for inclusion in the State's BEAD and Digital Equity Plans. Input gathered through these meetings has driven the development of the needs assessment and measurable objectives included in this Plan. The DETF has

additionally provided feedback on concepts included in this draft Plan and of the State's draft BEAD Initial Proposal in parallel. The DETF will continue to support Plan implementation.

In addition to ConnectALL and NYSL, the current DETF includes State representatives from Department of Labor, Office of Children and Family Services, Department of Health, Department of State, Education Department, Office for the Aging, Department of Financial Services, New York State Council on Developmental Disabilities, Department of Public Service, Office of Temporary and Disability Assistance, Council on Children and Families, Office for People with Developmental Disabilities, Homes and Community Renewal, and Department of Civil Service.

The DETF is and will continue to be a key feature of ConnectALL's coordinated engagement as it brings a diversity of perspectives and government expertise to digital equity issues. In the planning phase, the DETF advised on the development of ConnectALL's vision for digital equity for all outcome areas and overall development of the SDEP. Beyond the planning phase, the DETF will:

- Provide feedback on the draft SDEP and BEAD Initial Proposal during and after the public comment periods.
- Continue to provide information to ConnectALL about ongoing State agency initiatives and priorities.
- Guide, evaluate, assess, and support the development, implementation, and sustainability of future/ongoing broadband and digital equity initiatives.
- Review resources published by ConnectALL relating to digital equity.
- Facilitate partnerships with and among external experts and community leaders.

Continuing the DETF's role in implementation, policy development, and the evaluation of performance indicators will amplify ConnectALL's reach and impact.

Table 10: Digital Equity Task Force Committee Summary Information

DETF Committee	Co-Chairs or Members	Town Hall Date
Steering Committee	ConnectALL New York State Library Department of Labor Office of Children and Family Services Department of Health Department of State Education Department Office for the Aging Department of Financial Services Developmental Disabilities Planning Council Department of Public Service Office of Temporary and Disability Assistance Council for Children and Families Office for People with Developmental Disabilities Homes and Community Renewal Department of Civil Service	
Education	Lauren Moore, New York State Library Paul Cardettino, New York State Education Department Monique Tate, CommunityTechNY Dale Breault, Franklin Essex Hamilton BOCES	May 31, 2023

DETF Committee	Co-Chairs or Members	Town Hall Date
Workforce Development	Orville Abrahams, New York State Department of Labor Rachel Sheridan, CanCode Communities Diana Caba, Hispanic Federation	June 29, 2023
Health	Crystal Collette, New York State Office for the Aging Andrew Lebwohl, New York State Department of Health Becky Preve, Association on Aging in New York Elana Kieffer, New York Academy of Medicine Ann Cunningham, OASIS Laura Palmer, Healthcare Association of New York State	July 13, 2023
Civic and Social Engagement	Camilla Campisi, New York State Office for New Americans Lauren Moore, New York State Library Natalie Henderson, Cell-Ed Dr. Anael Alson, My Brother's Keeper	July 31, 2023
Accessibility of Government Services	Jackie Hayes, New York State Council on Developmental Disabilities Benjamin Pomerance & Shannon MacColl, New York State Department of Veterans' Services	August 3, 2023

DETF Committee	Co-Chairs or Members	Town Hall Date
	Mike Rogers, Self-Advocacy Association of New York Laurie Wheelock, Public Utility Law Project	

4.2.3 New York State Internet Access Survey

ConnectALL, in partnership with regional Digital Equity Coalitions, secured over 5,700 New York State Internet Access Survey responses. The survey gathered information about needs, barriers, and opportunities from New York State residents. Response rate targets for the Survey were developed based on regional population demographics to ensure that all covered populations and regions would be equitably represented in statewide survey data. Digital Equity Coalitions each created their own specific outreach plan targeted toward reaching their unique communities and partners.

4.2.4 Industry and Stakeholder Forums

ConnectALL launched a virtual forum series to provide ISPs and other key stakeholder groups with regular program updates, technical assistance, and to solicit input on program design and planning. Over 170 ISP representatives and over 180 other stakeholders have attended these forums. ISP forums to date have included the following topics:

- Federal Program Overview
- Working with New York State: Supplier Diversity and Capital Assistance
- Climate Resiliency and Cybersecurity
- ConnectALL’s Affordable Housing Connectivity Program

The Forums for other stakeholder groups have included:

- Broadband Funding Opportunities for Community Anchor Institutions (CAI)
- Updates for Counties, Large Municipalities, and Regional Planning Councils
- ConnectALL’s Affordable Housing Connectivity Program for Property Owners, Trade Associations and Advocacy Coalitions

Following each Forum, surveys and/or data requests were sent to participants to support the SDEP and BEAD planning processes. ConnectALL is in the process of posting all forum recordings. See *SDEP Appendices* for details on each Industry and Stakeholder Forum held thus far.

4.2.5 Tribal Nation Engagement

ConnectALL engaged the leadership of Tribal Nations through formal and informal channels to understand the specific and unique needs of each of the eight Federally recognized Nations in New York State as well as one Tribal Nation not recognized by the Federal government. ConnectALL sought to incorporate their needs as well as existing plans, programs, and resources into this Plan. ConnectALL sent requests in writing for formal consultations with each Nation and followed up via phone, email, and through State agency partners. ConnectALL held one in-person formal consultation with the Seneca Nation and Saint Regis Mohawk Tribe and attended a Tribal Broadband Bootcamp hosted by Mohawk Networks, along the US-Canada border in Akwesasne, New York.

ConnectALL conducted parallel outreach through State agencies to Tribal Nation contacts and community organizations working directly with Tribal communities. Engagement with Tribal Nations was also conducted through market-sounding interviews. Outreach has continued throughout the planning phase encouraging Native Nations to discuss challenges and visions for digital equity, supporting efforts to improve enrollment in ACP, and offering assistance with broadband infrastructure plans underway.

4.2.6 Incarcerated Individuals Engagement

Since the perspectives of Covered Populations are driving digital equity planning, targeted outreach strategies have been essential for ensuring inclusion. ConnectALL has been working with the Fortune Society to conduct additional focus groups with people who are formerly incarcerated and family members of people who are incarcerated to gather information for the Needs Assessment and Asset Inventory relevant to this historically marginalized underserved group.

4.2.7 Market Sounding and Stakeholder Interviews

ConnectALL conducted an in-depth market sounding including over 40 interviews with potential deployment partners including ISPs, electric co-ops, middle mile infrastructure owners, and others. The purpose of these meetings was:

- 1) to solicit feedback on preliminary ConnectALL program design,
- 2) to proactively identify potential market hurdles and concerns ahead of grant program launch,
- 3) to identify incentives and strategies that can move the needle on encouraging market participation in ConnectALL programs, and
- 4) to collect input from private sector entities and utilities on program design.

ConnectALL conducted 40 additional interviews towards the same purposes with other key stakeholders including counties, municipalities, affordable housing property owners, and workforce development organizations. These interviews have informed the development of this Plan, the BEAD Initial Proposal, program design for ConnectALL's grant programs, and a statewide broadband workforce strategy focused on how universal broadband access and digital

literacy development can improve workforce outcomes for historically underserved New Yorkers. See *SDEP Appendices* for a detailed list of partners consulted.

4.3 Regional Engagement & Participatory Planning

To both honor and leverage New York’s incredible diversity, ConnectALL has ensured unique geographic needs and differences are a cornerstone of the broadband and digital equity planning process through a regional approach to stakeholder engagement. Discussion of covered populations’ barriers to access will surface insights to inform deployment planning while discussion of existing broadband planning efforts will inform digital equity planning. The regional engagement strategy- the creation and strengthening of partnerships between organizations in the same region – are critical for ensuring the broadband infrastructure and digital equity work are coordinated and inextricable.

ConnectALL’s stakeholder engagement plan centers the experience and expertise of covered populations through the implementation of a participatory planning process created through partnerships with regional DEC’s. These partnerships fostered relationship building within the region to host events, support ConnectALL’s statewide needs assessment and asset inventory, and support distribution of ConnectALL’s statewide survey. These regional coalitions also partnered with Regional Planning Councils and Regional Economic Development Councils on the activities below, particularly planning the listening sessions. Federally funded Community Action Agencies partnered on regional participatory planning activities, including focus groups, asset inventory creation, and survey distribution in some regions. The value of this strategy is evident and has already led to the development of new coalitions and activities, for instance a coalition led by the Mohawk Valley Economic Development District and Mohawk Valley Community College and a needs assessment and asset inventory in Central New York led by the Central New York Regional Planning and Development Board.

Table 11: Digital Equity Coalitions & Other Organizations Serving as Regional Partners

Region(s)	Organization
Capital Region	Capital Region Digital Equity Coalition
Central New York	Central New York Digital Inclusion Coalition
Finger Lakes	Finger Lakes Digital Inclusion Coalition
Long Island	Long Island Digital Inclusion Coalition
Mid-Hudson	Southeastern NY Library Resources Council

Region(s)	Organization
Mohawk Valley	Mohawk Valley Community College
New York City	Older Adults Technology Services from AARP
North Country	North Country Digital Inclusion Coalition
Southern Tier	Southern Tier Digital Equity Coalition
Westchester County	The STEM Alliance
Western New York	Western New York Digital Equity Coalition

4.3.1 Counties, Municipalities, and Regional Planning Councils (RPCs)

ConnectALL hosted several rounds of meetings with over 50 county government and 10 Regional Planning Council representatives through a series of 11 county meetings in February 2023 to understand local infrastructure and digital equity challenges. Many of these meetings centered on strategizing to mobilize local resources to submit challenges to the FCC’s National Broadband Map. ConnectALL convened a series of three webinars to educate stakeholders on the FCC challenge process and mobilize them to gather evidence for challenges if locations within their areas were misrepresented on the map. Following the webinars, ConnectALL conducted “office hours” sessions with challenge process participants, fielded dozens of questions, and provided guidance via one-on-one calls with several counties. This engagement was ongoing for the period of initial challenge submissions (December 2022-January 2023); following submissions, ConnectALL then conducted a series of follow-up meetings with each Regional Planning Council and their member counties and municipalities to understand the findings and key takeaways that each community had from its participation in the process. See *SDEP Part II Appendices* for a detailed list of stakeholders consulted. ConnectALL continues to conduct interviews or one-on-one meetings as needed and on an ongoing basis.

ConnectALL also worked closely with the New York City Office of Technology and Innovation (OTI) to develop recommendations throughout the planning process. OTI solicited feedback on digital equity barriers and opportunities from City agencies serving covered populations and shared the consolidated insights, which ConnectALL incorporated into this Plan.

ConnectALL partnered with Digital Equity Coalitions (DECs) and community groups to host hybrid in-person and virtual listening sessions in every region in New York, in addition to each Borough of New York City. These listening sessions solidified regional partnerships, introduced ConnectALL leadership, launched regional engagement activities, and provided updates on

digital equity planning. DECs supported the ConnectALL planning process through structured baseline data collection directly from covered populations. Thousands of New York State residents have participated in the digital equity planning process through these sessions.

The listening sessions informed:

- ConnectALL’s statewide broadband and digital equity Needs Assessment by facilitating discussion on barriers to broadband access and digital equity.
- ConnectALL’s statewide broadband and digital equity Asset Inventory by facilitating discussion on existing digital equity programs, organizations, and leaders, as well as existing local, county, and regional broadband deployment and digital equity planning and data-collection efforts.
- ConnectALL’s approach to ecosystem development, by creating an opportunity for local government representatives, regional Planning and Economic Development Councils, community-based organizations, and ISPs to enter into a dialogue with one another and understand barriers to broadband access and digital equity within their region.

4.3.2 Digital Equity Focus Groups

DECs conducted focus groups with covered populations throughout their region for more in-depth and population-specific discussion of challenges and barriers to broadband access and adoption. DECs across the state conducted 47 focus groups, engaging 721 individuals. ConnectALL developed population targets for each region based on regional population demographics to ensure that all covered populations were engaged through dedicated focus groups: aging individuals (8), individuals with language barriers (5), low-income New Yorkers (7), racial minorities (7), rural inhabitants (7), veterans (4), individuals with disabilities (5), and formerly incarcerated individuals (4). These focus groups added essential texture and depth to data being collected via the New York State Internet Access Survey. The questions in the script were intentionally aligned with those in the survey, but with more time allocated to hear anecdotes and capture nuance and sentiments from participants who might not otherwise be represented in the survey or who might have multiple, overlapping barriers to completing the full survey.

4.3.3 Regional Data-Gathering for the Needs Assessment and Asset Inventory

Digital Equity Coalition partners led community-based efforts to submit regional contributions to ConnectALL’s needs assessment and asset inventory, ensuring the focus on gathering regionally specific data across covered populations throughout the State. These resources will help the State to establish a baseline from which to measure progress and success for ongoing and future initiatives.

4.4 Implementation Phase Engagement Strategy

ConnectALL used the engagement methods detailed here to draft Plan as sustainable and flexible structures that subsequent efforts can build upon. Partnerships and relationships built through the planning process will be strengthened as ConnectALL transitions to implementation. Strategies ConnectALL will employ to collaborate with key stakeholders in the state include:

- Utilizing the Needs Assessment and Asset Inventory to support the full digital equity ecosystem with network building, resource identification, and public outreach.
- Building new DETF subcommittees geared toward implementation or focused on intergovernmental collaboration through the core State agency representatives.
- Hosting ISP and other stakeholder forums based on questions and issues that arise and continuing to develop materials and technical assistance for these audiences.
- Building strategic partnerships with Digital Equity Coalitions, Regional Planning Councils, Regional Economic Development Councils, Tribal Nation leaders and organizations, and community organizations to disseminate information, receive ideas and feedback, and maintain a coordinated but geographically tailored digital equity engagement approach throughout New York State.
- Consulting with the Broadband Deployment Advisory Committee to advise on ConnectALL program design/implementation and policy changes to promote broadband expansion and development.
- Leading external affairs to build coalitions to strengthen economic and workforce development efforts essential for achieving digital equity.
- Targeting key strategic partnerships for further exploration through engagements such as those illustrated in *SDEP Appendices*.

4.4.1 Public Comment

ConnectALL engaged the following strategies for presenting the Plan to the public for feedback on the draft through the public comment period. ConnectALL created an accessible online form, to serve as the collection mechanism across the below strategies:

- **Awareness Events:** ConnectALL will create awareness for the public comment period prior to its opening by publicizing the opportunity for feedback at several events in the month leading up to the opening of public comment.
- **Digital Equity Task Force Town Halls:** DETF hosted multiple town hall meetings geared toward receiving and discussing public comments. Each meeting will have facilitated outcome area breakout sessions hosted by the outcome area subcommittee co-chairs.
- **Regional Approach:** Leveraging the strategic partnerships and diversity of the state, ConnectALL will support feedback sessions led by the state's Digital Equity Coalitions.
- **Virtual Forums:** ConnectALL will host forums dedicated to public comment from ISPs and other regional stakeholders.

- **Other Event and Conference Presentations:** ConnectALL staff will facilitate live public comment sessions as a part of public speaking engagements and conference sessions scheduled during the public comment period.

4.4.2 Public Engagement and Comment Response

During the public comment period (Nov. 6 – Dec. 6, 2023), ConnectALL received over 160 comments through its portal and reviewed each in alignment with its stated digital equity goals. Comments were also generated from feedback forums ConnectALL facilitated in 9 of the State’s 10 regions. Additionally, at forums hosted by ConnectALL or partner stakeholder organizations, ConnectALL provided an overview of the draft Plan and encouraged public comment. Through 21 forums, over 920 individuals across a range of invested entities (i.e., community anchor institutions, digital equity coalitions, non-profit organizations representing covered populations, government units, and economic development and planning organizations. As required, each comment received an individual confirmation by email on the day it was received.

Generally, public comments expressed satisfaction with the scope of the Plan and a positive interest in its implementation. However, commenters also shared several concerns regarding funds for developing digital navigator programs and sustaining digital equity coalitions, scaling digital literacy resources by advancing the reach and utility of digital learning platforms and devices, as well as support for essential modern-day cybersecurity skills. After close of public comments, ConnectALL considered all input into the Plan and:

1. addressed proposed corrections,
2. added a glossary,
3. updated the evolving asset inventory,
4. reviewed opportunities to increase cyber security and digital privacy resources,
5. assessed the scope of policy suggestions regarding affordability of broadband services,
6. revised all representational classifications of rural populations under the statutory definition.

Specifically, ConnectALL received public comments seeking further engagement with people with disabilities. In response, ConnectALL partnered with the New York State Office of the Chief Disability Officer and other key statewide stakeholders to conduct interviews with members of, and advocates for, the disability community to ensure a meaningful presence in the Plan now, and to advance ongoing dialogue ahead. In addition, ConnectALL integrated new insights into the gap analysis (see **Section 3.2.1.2**) that more clearly surfaces the digital inclusion needs of justice-impacted individuals. ConnectALL remains interested in further input and direction from New York State First Nations, at their discretion. ConnectALL will continue to apply its broad tactics for ongoing public engagement, develop relevant partnerships and collaborations across localities, and provide public space - online and off with accommodations – for public comment and suggestions, as well as assessment and transparency. **See full record and responses to comments below (pages 166-251, also in Plan Appendices).**

5.0

Implementation

5.0 Implementation

The implementation detailed in this section affects all Covered Populations. Where there are notable gaps for specific Covered Populations, ConnectALL will prioritize policy and funding interventions for those groups. This approach, described at **7.4 Intersectionality of Covered Populations**, underscores how characteristics may overlap and require broadly defined actions to improve equity conditions for all residents even where they may not be directly identified. ConnectALL will continue to engage Covered Populations and stakeholders across the State during its implementation process to ensure that goals, objectives, and outcomes remain aligned and relevant, consistent with ConnectALL’s survey data methodology described in **7.2 Survey Data Methodology**.

Key activities are categorized under ConnectALL’s Theory of Change (see Chapter 2):

- Strategy 1: Grounding Investments in an Asset-Based Approach
- Strategy 2: Strengthening Networks to Share Resources & Take Coordinated Action
- Strategy 3: Building Alignment & Awareness
- Strategy 4: Sharpening & Socializing our Digital Equity Lens

5.1 Implementation Strategy: Key Activities

5.1.1 Broadband Availability and Affordability Strategy

Identified Need (A)
Covered populations report lower rates of broadband internet connection access and experience slower speeds and unreliable connections.
Measurable Objectives
Increase the number of households statewide that report broadband internet connection at home.
Covered Populations
Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.
Key Activities
<p>Strategy #1: Grounding Investments in an Asset-Based Approach</p> <ul style="list-style-type: none"> • Invest public funding and facilitate private investment to deliver last-mile connections to households in New York. Expand and improve broadband

infrastructure in areas over reliant on DSL and Satellite service and places where there are gaps in availability or aging infrastructure, primarily through BEAD programs, as discussed in the BEAD 5-Year Action Plan.

- Invest in high-quality internet infrastructure in low-income areas, including in housing where service is slow, unreliable, or not available

Identified Need (B)

New Yorkers are concerned about a lack of choice among ISPs, leading to lower quality of service at higher prices.

Measurable Objectives

Increase the share of locations in each region that have more than one ISP option.

Covered Populations

Ageing populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.

Key Activities

Strategy #1: Grounding Investments in an Asset-Based Approach

- Invest public funding and facilitate private investment to create a robust and competitive internet marketplace in New York via ConnectALL's Affordable Housing Connectivity and Municipal Infrastructure Programs, as described in the BEAD 5-Year Action Plan.

Strategy #2: Strengthening Networks to Share Resources & Take Coordinated Action

- Invest in civic engagement campaigns and programs aiming to increase awareness and action around issues related to internet choice.

Identified Need (C)

New Yorkers with bundled services that combine internet with other media are generally exposed to greater price volatility and higher prices.

Measurable Objectives

Increase the share of locations in each region that have options for unbundled, affordable broadband service.

Covered Populations

Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.

Key Activities

Strategy #2: Strengthening Networks to Share Resources & Take Coordinated Action

- Raise public awareness of the risks associated with accessing internet via service bundles.

Strategy #3: Building Alignment & Awareness

- Explore approaches to subsidy or funding programs to limit bundled service and ensure previous payment issues with bundled plans are not cause for consumer ineligibility.
- Promote provisions to ensure costs from bundled services are not hidden from consumers.

Identified Need (D)

Eligible New Yorkers are not aware of the ACP subsidy, and some New Yorkers who are aware of the ACP subsidy cannot or do not use it.

Measurable Objectives

Increase awareness and adoption of internet affordability programs.

Covered Populations

Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.

Key Activities

Strategy #1: Grounding Investments in an Asset-Based Approach

- Invest in outreach efforts in target languages/ethnic media accessible to individuals with language barriers.
- Fund existing efforts to better reach aging individuals, veterans, and others with limited mobility.

Strategy #2: Strengthening Networks to Share Resources & Take Coordinated Action

- Support coordinated awareness-building campaigns such as programming in covered population community spaces, advertising, and organizing.

Strategy #3: Building Alignment & Awareness

- Work with program administrators within and outside of government to align ACP eligibility and enrollment processes with other means-tested programs.

Strategy #4: Sharpening & Socializing our Digital Equity Lens

- Identify ways that public, nonprofit, ISP, and other private resources can better complement ACP subsidies to make internet more affordable for low-income households.

5.1.2 Accessible Device & Device Support Strategy

Identified Need (A)
New Yorkers struggle to afford internet-enabled devices at home.
Measurable Objectives
Increase number of New York households with internet-enabled devices at home.
Covered Populations
Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.
Key Activities
<p>Strategy #1: Grounding Investments in an Asset-Based Approach</p> <ul style="list-style-type: none"> • Expand existing programs that are focused on distributing new and refurbished internet-enabled devices to New Yorkers, with a preference for developing pathways for device ownership (rather than rentals) where possible. • Expand funding to assets and explore direct partnerships with device manufacturers so that assets can afford to obtain and distribute newer and unused devices to eligible New Yorkers. <p>Strategy #2: Strengthening Networks to Share Resources & Take Coordinated Action</p> <ul style="list-style-type: none"> • Link households that participate in device distribution programs with convenient programs to safely recycle or dispose of electronic waste. • Deploy the NYS Digital Equity Asset Inventory as a “digital directory” that points users to digital devices programs in their region that meet their specific needs.

Identified Need (B)
New Yorkers need specialized assistive devices to effectively use the internet.

Measurable Objectives
Increase access to assistive technology to meet the needs of New Yorkers.
Covered Populations
Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.
Key Activities
<p>Strategy #1: Grounding Investments in an Asset-Based Approach</p> <ul style="list-style-type: none"> Identify the assistive technology (e.g., screen magnification devices, eye-tracking mice, etc.) deemed most cost-effective by assets that work with these covered populations and support the distribution of such devices by trusted asset partners in New York. Partners can deploy these devices onsite in public spaces and directly to eligible New Yorkers.

Identified Need (C)
New Yorkers that already have devices, and those that receive or borrow new or refurbished devices from existing assets, lack easily accessible technical support to maintain the devices and troubleshoot challenges.
Measurable Objectives
Decrease the number of New Yorkers reporting challenges maintaining or troubleshooting their own devices.
Covered Populations
Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.
Key Activities
<p>Strategy #1: Grounding Investments in an Asset-Based Approach</p> <ul style="list-style-type: none"> Fund existing and new programs that provide technical support to New Yorkers experiencing technology challenges with their devices. <ul style="list-style-type: none"> Help assets create or expand the availability of virtual/video/screenshare technical support to reach New Yorkers that cannot or would prefer not to receive in-person technical assistance. (This will only help New Yorkers with reliable internet connection). <p>Strategy #3: Building Alignment & Awareness</p>

- Engage with stakeholders to align on set of technical assistance program specifications needed particularly to improve health outcomes and the accessibility and inclusivity of public resources.

Strategy #4: Sharpening & Socializing our Digital Equity Lens

- Collect and publish best practices in effective technical support that increases New Yorkers’ ability to care for their own devices after a technical support interaction.
- Evaluate the impact of assets whose programming includes inter-generational skill-sharing (e.g., youth supporting aging individuals with technology challenges) and expand successful programs. Target aging individuals and other adults that live alone or without caregivers

Identified Need (D)

More New Yorkers having devices at home corresponds to a need for device upgrading, disposal, recycling, and refurbishment in the future to ensure that New Yorkers’ digital needs are met as technology evolves, while protecting their privacy and the environment.

Measurable Objectives

Increase options for proper device disposal, recycling, and refurbishment.

Covered Populations

Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.

Key Activities

Strategy #1: Grounding Investments in an Asset-Based Approach

- Fund existing and new programs that provide device upgrading, disposal, recycling, and refurbishment services to New Yorkers.

Strategy #3: Building Alignment & Awareness

- Engage with State agencies to streamline State activities and investment at the intersection of cybersecurity and equipment recycling.

Strategy #4: Sharpening & Socializing our Digital Equity Lens

- Understand and share best practices emerging from implementation of NYS Electronic Equipment Recycling and Reuse Act.⁵⁷

5.1.3 Digital Literacy Strategy

Identified Need (A)
Covered populations report lower confidence across all digital literacy skills. New Yorkers are also prevented from (re)joining the labor force because of their lack of digital literacy.
Measurable Objectives
Increase New Yorkers' awareness of available digital literacy programs.
Covered Populations
Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.
Key Activities
<p>Strategy #1: Grounding Investments in an Asset-Based Approach</p> <ul style="list-style-type: none"> • Fund expansions and replication of high-performing digital literacy-building job training programs. Investments should be made in partnership among community-based organizations, educational institutions, local workforce development offices, employers, and government to design comprehensive digital inclusion initiatives to provide training, mentorship, and other resources to underserved communities. <p>Strategy #2: Strengthening Networks to Share Resources & Take Coordinated Action</p> <ul style="list-style-type: none"> • Coordinate the field to create a directory of vetted digital skill-building job training programs to increase the value of credentials in the perspective of industry and market this directory to industry. • Improve marketing efforts, including multilingual campaigns and partnerships with community-based organizations, to raise awareness of programs and empower individuals to pursue digital literacy training.

Identified Need (B)

⁵⁷ Electronic Equipment Recycling and Reuse Act, Article 27 Title 26 Environmental Conservation Law § (2010). https://www.dec.ny.gov/docs/materials_minerals_pdf/ewastelaw2.pdf.

New York’s small business owners are unable to grow their businesses because of a lack of digital literacy. Rural and aging New Yorkers distrust telehealth services that could improve their health outcomes.

Measurable Objectives

Increase covered populations’ access to digital literacy programming aligned to their specific needs and interests.

Covered Populations

Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.

Key Activities

Strategy #1: Grounding Investments in an Asset-Based Approach

- Fund existing efforts that provide digital literacy training, especially those focused on skills for aging individuals, formerly incarcerated, and low-income New Yorkers, and New Yorkers with language barriers and disabilities.
- Pilot customizable training models that allow New Yorkers some self-direction.
- Provide access to digital literacy training classes and modern technology to incarcerated individuals within State prisons.
- Provide financial incentives and support during training for underserved and underrepresented populations to increase successful participation and address barriers to training program participation like financial insecurity that hinder recruitment. Provide wraparound services, including childcare, transportation assistance, access to devices, and stable internet access to trainees to ensure success.

Strategy #2: Strengthening Networks to Share Resources & Take Coordinated Action

- Deploy the NYS Digital Equity Asset Inventory as a “digital directory” that points users to digital literacy programs in their region that meet their needs.
- Follow up with ACP subsidy subscribers and share digital literacy and skill-development offerings.

Strategy #4: Sharpening & Socializing our Digital Equity Lens

- Compile and consolidate best practices in digital literacy and digital job skills training at the regional- and state-levels and disseminate among partners to support strong programming statewide.

Identified Need (C)

Inconsistencies across existing curricula and a lack of alignment with industry-desired credentials reduce the potential impact of digital literacy programming.

Measurable Objectives

Increase coordination among training providers.

Covered Populations

Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.

Key Activities

Strategy #1: Grounding Investments in an Asset-Based Approach

- Recognize the vital role educators play in teaching foundational digital literacy and integrating digital fluency across all subjects for K-12 and college and adult education programs, support education and training for educators. Develop robust digital fluency programs for educators across all education levels.

Strategy #3: Building Alignment & Awareness

- Convene key stakeholders to align on standardized and portable credentials that reflect evolving industry needs and indicate job readiness to employers.

Strategy #4: Sharpening & Socializing our Digital Equity Lens

- Explore needs for tech and digital literacy education in K-12 schools and confirm the extent of existing digital literacy assets within and connected to schools (including assets that offer programming in multiple languages).
- Evaluate the strategies and impact of existing assets that provide career-oriented digital literacy support to New Yorkers, particularly youth. The analysis should assess the degree to which existing programs offer credentials recognized and valued by industry.

5.1.4 Privacy & Cybersecurity Strategy

Identified Need (A)

Most New Yorkers are concerned about their online safety. Covered populations reported universal concern over stolen data, scams, and surveillance. Individuals with disabilities, racial and ethnic minorities, and youth were more likely to report concern over online harassment than other New Yorkers.

Measurable Objectives

Increase the number of assets providing Privacy & Cybersecurity training to New Yorkers.

Covered Populations
Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.
Key Activities
<p>Strategy #1: Grounding Investments in an Asset-Based Approach</p> <ul style="list-style-type: none"> • Fund programs providing online safety training to help New Yorkers protect themselves against stolen data, scams, surveillance, and online harassment. <p>Strategy #2: Strengthening Networks to Share Resources & Take Coordinated Action</p> <ul style="list-style-type: none"> • Follow up with ACP subsidy subscribers and share digital cybersecurity and internet safety resources. • Explore methods of shifting the burden of protection away from individuals and toward communities, as well as online platforms and content providers. <p>Strategy #3: Building Alignment & Awareness</p> <ul style="list-style-type: none"> • Ensure school districts are consistently aware of safety and data privacy measures and that educators have a defined role in fostering online safety. <p>Strategy #4: Sharpening & Socializing our Digital Equity Lens</p> <ul style="list-style-type: none"> • Publish guidance on key elements to digital safety that should be incorporated into digital literacy programming backed by research on common vulnerabilities. Guidance should be developed in partnership with existing assets with the greatest expertise in this area. • Explore establishing a Trust & Safety community of practice for ongoing collaborative problem-solving on related issues.

5.1.5 Accessibility & Inclusivity of Public Resources Strategy

Identified Need (A)
Covered populations frequently cited inconsistent accessibility standards as a primary frustration in engaging with government resources online.
Measurable Objectives
Collaborate on the design and implementation of universal accessibility standards across State government websites.
Covered Populations

Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.

Key Activities

Strategy #2: Strengthening Networks to Share Resources & Take Coordinated Action

- Conduct targeted outreach to better understand the scope and impact of inconsistent accessibility standards for government resources with both field and lived experts.
- Engage field and lived experts in a codesign process to create updated standards.

Strategy #3: Building Alignment & Awareness

- Conduct outreach via Digital Equity Task Force to determine State agency needs around updating and maintaining website accessibility, especially for use cases related to benefits access for covered populations.

Strategy #4: Sharpening & Socializing our Digital Equity Lens

- Confirm existing State and local government ability and tools to enforce or guide standard-setting for State and local government websites.

Identified Need (B)

Covered populations reported a lack of trust, rather than access, as the primary reason they were less likely to access government services online.

Measurable Objectives

Develop outreach campaigns to increase covered populations' trust in online government services.

Covered Populations

Aging populations, Incarcerated and formerly Incarcerated Individuals, Low-income Households, People with Disabilities, People with Language Barriers, Racial and Ethnic Minorities, Rural Inhabitants and Veterans.

Key Activities

Strategy #2: Strengthening Networks to Share Resources & Take Coordinated Action

- Conduct targeted outreach with field and lived experts on accessing government resources online to better diagnose roots of mistrust among covered populations.

- Engage field and lived experts in a codesign process to create new and augment existing outreach strategies that engender greater trust in online government resources.
- Fund public education strategies by trusted messengers to increase covered populations' trust in accessing online government resources.

Strategy #3: Building Alignment & Awareness

- Conduct outreach via Digital Equity Task Force to better understand state agency experiences around public mistrust of online resources and codesign solutions that are applicable across agencies and programs.

Strategy #4: Sharpening & Socializing our Digital Equity Lens

- Document and share best practices for developing trust among covered populations in online government services.
- Explore establishing a Trust & Safety community of practice for ongoing collaborative problem-solving on related issues.

5.2 Implementation Strategy: Leveraging Assets

ConnectALL will pursue activities in line with the strategic pillars, detailed below, consistent with the conditions, principles, and vision described in this chapter.

1. Grounding Investments in an Asset-Based Approach

- Rather than starting from deficits, ConnectALL will seek to build the capacity of community-rooted and trusted digital equity organizations over the long term.
- ConnectALL will do this by filling in gaps, strengthening, and scaling what is working well across existing assets, creating new assets only where necessary. ConnectALL will make structural changes to increase access to these assets.

ConnectALL will explore methods to execute this strategy including:

- **Invest in physical and digital accessibility across New York's public library system.** As highlighted throughout this plan, libraries are a key partner in the fight to close the digital divide, so their buildings and websites need to be accessible to all covered populations for ConnectALL to effectively partner with them in identifying and scaling programs as part of the Capacity Grant Program.
- **Consider allocating a portion of capacity grant resources toward the creation of a participatorily budgeted and governed fund** so local digital equity and lived experts can steward capacity grant funding as they see fit. This will support Strategy 3 and solidify trust between ConnectALL and the public.

2. Strengthening networks to share resources and take coordinated action

- ConnectALL will invest in ensuring that digital equity organizations and service providers and the communities they serve are independently connected, collaborating, and sharing knowledge, which will ensure the long-term sustainability of digital equity efforts beyond the life of the federal funding currently available.
- Organizations, service providers, and community members in organized networks will power civic engagement on digital equity issues (and, ideally, on a suite of social issues) in New York. Advocacy, community organizing, and campaigns are strengthened by the ability to identify points of solidarity, mobilize collective action, and increase participation in democratic processes—both online and offline.

ConnectALL will explore methods to execute this strategy including:

- **Continuing to support the capacity and sustainability of regional DECs.** ConnectALL aims to ensure coalition longevity and growth as key anchors in the state's ecosystem, as by facilitating knowledge-sharing and partnership among coalitions and convening them semi-frequently to strengthen their connections.
- **Integrating alternative approaches into the traditional digital equity toolkit or transitioning existing models where appropriate, including base-building, community-organizing, and community ownership and stewardship models.** These approaches can serve as a launchpad for communities to self-determine their internet and infrastructure futures. This supports Strategies 3 and 4 by promoting wider public education across digital equity issues and generating novel approaches to ending the digital divide.

3. Building Alignment & Awareness:

- ConnectALL will aim to organize expertise and resources across the field and government (at the State, regional, county, and municipal levels) to advance digital equity policy innovation and standard setting across social programs.
- ConnectALL will promote standout programs to the public to broaden awareness and adoption of best practices; inherent in this effort is the need to build, deepen, and in some cases repair trust between government and communities.
- By aligning the force of the government behind insights from the field and making government efforts more known to the public, ConnectALL can create a virtuous circle whereby the best practices identified through our asset-based approaches and network development are mutually reinforced by all stakeholders and can have greater impact through wider audiences.

ConnectALL will explore methods to execute this strategy including:

- **Further developing the Digital Equity Task Force (DETF) infrastructure**, which was crucial during the ConnectALL planning process. DETF brings to bear a diversity of expertise—from government and digital equity practitioners and

experts across the state who serve covered populations—on digital equity issues; expanding the mission to include implementation, policy development, and performance measurement functions going forward will continue to amplify ConnectALL’s reach and impact.

- **Creating and maintaining a publicly available online asset inventory that functions as a statewide digital equity services directory.** This also furthers Strategies 2 and 4, by cataloguing unconventional programs and services under a digital equity umbrella and elevating best practices in a transparent and accessible format, respectively.
- **Coordinating public education campaigns on an ongoing basis across** digital equity issues that are critical to ConnectALL achieving its mission. These are distinct and ideally complement the grassroots campaigns of Strategy 2.

4. Sharpening & Socializing our Digital Equity Lens

- Because the digital divide is ever-evolving, ConnectALL will incubate new approaches to persistent challenges, measure its own impact and the work of others, and publish its findings.

ConnectALL will explore methods to execute this strategy including:

- **Creating and resourcing communities of practice across outcome areas to facilitate joint problem solving and participatory program design.** These structures would support ConnectALL’s grants management and communications efforts through the implementation process and further Strategy 2 by building another kind of network of engaged stakeholders.
- **Releasing data ConnectALL collects publicly as mechanism for transparency and accountability,** supporting Strategies 2 and 3 by allowing communities to independently understand and act on the data, respectively.

Together, these strategic pillars prioritize and streamline activities in pursuit of its mission, even as one-time funding is deployed. This theory of change is also responsive to the goals that stakeholders communicated during ConnectALL’s planning process, including:

- Supporting existing organizations who have built trust with communities and covered populations.
- Building the capacity of these organizations and the people they serve to design their own solutions to promote digital equity.
- Coordinating existing resources and efforts in government to build strategic redundancies and ensuring those best situated to solve a certain dimension of the digital divide can embrace their strategic advantages.
- Continuing to innovate to bridge the digital divide in New York once and for all.

5.3. Implementation Strategy: Assets as Metrics

5.3.1 Developing and Sustaining New York’s Digital Equity Ecosystem

ConnectALL’s goal is to double the capacity of New York’s digital equity ecosystem over the next ten years. This goal is aligned with the State’s vision for digital equity: “to transform New York State’s digital infrastructure so all residents and businesses have access to high-speed, reliable broadband for education, economic growth, and full participation in civic life.”⁵⁸ This is a long-term vision.

New York is a large state, powered by a diverse and dynamic population. Digital Equity for New York cannot be a singular achievement; it must be a sustained effort that adapts to changes in technology, shifts in the role technologies play in our society, and the aspirations of the people of our state. ConnectALL has shaped the New York State Digital Equity Plan based on input from stakeholders and communities across the state and with the fundamental understanding that a one-time infusion of state and federal funding must translate into sustained, equitable growth in the capacity of the digital equity ecosystem to meet these enduring challenges. This framework respects and builds upon the strength and past efforts of our Digital Equity organizations and coalitions across the state.

- ConnectALL will achieve sustainable, measurable growth of the digital equity ecosystem through its four overarching strategies:
- Grounding investments in an asset-based approach;
- Strengthening networks to share resources and take coordinated action;
- Building alignment and awareness; and
- Sharpening and socializing the digital equity lens.

These strategies enable the State to:

- scale the digital equity capacity of existing and established organizations, partners, anchor institutions, providers and stakeholders;
- better document and promote opportunities and programs across its ten regions to enable collaborations among participants to multiply impacts; and
- facilitate emergence of new resources, programs, and capacities so that Covered Populations are best supported to achieve outcomes in education, health, employment, civic engagement, and access to services.⁵⁹

⁵⁸ Pursuant to the 2022 WIRED Broadband Act. See https://www.nysenate.gov/legislation/laws/UDA/16-GG*2.

⁵⁹ Cite to DEA NOFO -tbd

Accordingly, New York State’s framework for assessing the long-term growth in capacity of its digital equity ecosystem from the current baseline is uniquely designed to build on existing assets across the state rather than fill deficits.

5.3.2 Establishing a Baseline: Assets as Metrics of Meaningful Change

ConnectALL will use its Digital Equity Asset Inventory, generated through the statewide planning process and included in the Plan, to benchmark progress towards addressing the digital divide, from baseline to measurable objective, based on the proposed activities. The state has a current inventory of 964 digital equity assets, defined in greater detail below. ConnectALL has established the capacity to count these assets through the development of the Plan and will build on that capacity to monitor and assess changes in the digital equity ecosystem over time specific to focus areas, covered population, and geography in response to ConnectALL’s activities under the Digital Equity capacity grant program.

This inventory of 964 assets represents the measure of baseline capacity for New York. ConnectALL has established five- and ten-year benchmarks to orient towards sustained growth beyond the one-time infusion of federal funds. ConnectALL’s preliminary determination is to scale in proportion to the current inventory and set measurable objectives for each focus area, covered population, and region accordingly.⁶⁰ ConnectALL may refine these objectives or prioritize some in time based on the opportunity for faster growth within certain categories. Notwithstanding these refinements, ConnectALL will remain committed to the long-term objective of doubling the capacity of the Digital Equity ecosystem in New York.

ConnectALL will supplement the measurement and tracking of assets with ConnectALL’s formative and summative evaluation through the first five-years as described in at **5.2 Implementation: Evaluation** to assess the impact and effectiveness of individual assets. ConnectALL will utilize Capacity Grant funds in year one to develop a typology and comparison across assets to inform additional measurable objectives. ConnectALL will also periodically update the statewide assessment of internet adoption, use, and barriers as a broad indicator of outcomes. ConnectALL is committed to improving these broad indicators but does not expect to set granular targets based on these indicators because of the number of other factors involved in determining those conditions in a state as large and dynamic as New York.

5.3.2.1 Defining an Asset

An asset is an organization, program, or resource that addresses or promotes one or more of the following focus areas:

- 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;

⁶⁰ See the Digital Equity Asset Inventory at <https://bit.ly/NYS-DE-Asset-Inventory>.

- 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.

Each asset will directly address the digital divide in New York through specific activities focused on an identified population in an identified geography, for example by delivering education in digital literacy, promoting awareness of a low-cost internet service option, or providing access to computers. An asset can serve a specific Covered Population, address multiple Covered Populations, or be designed to reach all Covered Populations. An asset may be available statewide or exist in one or more of the state's ten regions. An asset can be an existing organization or program that newly addresses a focus area, Covered Population, or geography; newly promotes or partners with an organization or program that addresses a focus area; or significantly expands capacity to serve a Covered Population or geography. In nearly all cases, grants made directly by ConnectALL will create new assets, including where those grants build capacity at existing organizations, but ConnectALL will also monitor and collect information on the growth of digital equity assets more broadly, as it has done in establishing the baseline in the asset inventory.⁶¹

5.3.3 Baseline of Assets by Measurable Objectives

ConnectALL has set a measurable objective to increase the capacity of the Digital Equity ecosystem in New York by 25% within five years and 100% within ten years. Progress will be measured based on an increase in the number of assets, which ConnectALL will track by each focus area for each covered population and in each region. The current baseline along with the measurable objectives for each focus area are described below. In some cases, additional metrics or objectives are included.

ConnectALL will monitor progress towards the measurable objective through reports from its subgrantees, which will document both implementation of new assets and new interactions with partner organizations; through continued collaboration with local and regional coalitions, which ConnectALL will help grow in this timeframe and as part of this assessment framework; and through direct public engagement with the Digital Equity Directory that ConnectALL will build from the current Asset Inventory. ConnectALL will update the Digital Equity Directory on at least an annual basis to report publicly on progress towards the measurable objectives.

⁶¹ ConnectALL has compiled assets in the ConnectALL Digital Equity Asset Inventory by name and with an indication of the focus area(s), covered population(s), and region(s) of the state that each one addresses. A tally of assets by focus area, covered population, and region is shown in Table 1, which is available in the Appendices.

5.3.4.1 Broadband Availability & Affordability

- **Current data:** 44% of all residents find it somewhat or very difficult to pay their monthly internet bill. Covered Populations report lower rates of broadband internet access, as well as report experience with unreliable connections, slower speed (ConnectALL survey). There is a baseline of 497 assets in New York that address Broadband Availability & Affordability.
- **Measurable objectives:** Increase New York’s Digital Equity capacity by 124 assets that address Broadband Availability & Affordability in five years and by a total of 497 assets in ten years. At least 75% of the new assets in the five- and ten-year timeframes will address this focus area for all covered populations.
- **Additional metrics and objective:** Make broadband available at 100% of servable locations by 2030. Increase the number of consumers with options for low-cost or unbundled service plans.

	Number of assets addressing broadband availability and affordability	Percent of assets addressing broadband availability and affordability that serve all covered populations
Current	497	75%
Target after 5 years	621	75%
Target after 10 years	994	75%

5.3.4.2 Devices

- **Current data:** 9% of all residents lack access to the computer device they need (ConnectALL survey). There is a baseline of 405 assets in New York that address device access.
- **Measurable objectives:** Increase New York’s Digital Equity capacity by 101 assets that address connected device access in five years and by a total of 405 assets in ten years. At least 73% of the new assets in the five- and ten-year timeframes will address this focus area for all covered populations.
- **Additional metrics and objective:** Grow device ownership through recycling, refurbishing and donations; for example, increase from six to ten refurbishing sites over time, establish three corporate donation partnerships.

	Number of assets addressing device access	Percent of assets addressing device access that serve all covered populations
Current	405	73%

Target after 5 years	506	73%
Target after 10 years	810	73%

5.3.4.3 Digital Literacy

- **Current data:** 13% of all residents find it somewhat or very difficult to navigate the internet (ConnectALL survey). There is a baseline of 709 assets in New York that address digital literacy as a core feature of programming across all Covered Populations.
- **Measurable objectives:** Increase New York’s Digital Equity capacity by 177 assets that address connected device access in five years and by a total of 709 assets in ten years. At least 63% of the new assets in the five- and ten-year timeframes will address this focus area for all covered populations.
- **Additional metrics and objective:** Number of digital literacy programs funded; DE landing page traffic/awareness campaign impressions increase traffic 25% year over year.

	Number of assets addressing digital literacy	Percent of assets addressing digital literacy that serve all covered populations
Current	709	63%
Target after 5 years	886	63%
Target after 10 years	1418	63%

5.3.4.4 Cyber Security & Privacy

- **Current data:** 87% of all residents report being somewhat or very concerned about internet safety (ConnectALL survey). There is a baseline of 182 assets in New York that address cyber security and digital privacy.
- **Measurable objectives:** Increase New York’s Digital Equity capacity by 46 assets that address connected this focus area in five years and by a total of 182 assets in ten years. At least 76% of the new assets in the five- and ten-year timeframes will address this focus area for all covered populations.
- **Additional metrics and objective:** Increase the number of residents who report being more confident and comfortable online across all Covered Populations.

	Number of assets addressing cybersecurity and privacy	Percent of assets addressing cybersecurity and privacy that serve all covered populations
Current	182	76%

Target after 5 years	228	76%
Target after 10 years	364	76%

5.3.4.5 Accessibility of Public Resources & Services

- **Current data:** 12% of all residents report that online public resources are not accessible (ConnectALL survey). There is a baseline of 562 assets in New York that address Accessibility of Public Resources & Services.
- **Measurable objectives:** Increase New York’s Digital Equity capacity by 141 assets that address Accessibility of Public Resources & Services in five years and by a total of 562 assets in ten years. At least 73% of the new assets in the five- and ten-year timeframes will address this focus area for all covered populations.
- **Additional metrics:** Increase the number of New York residents accessing state websites to obtain government benefits and services.

	Number of assets addressing accessibility of public resources and services	Percent of assets addressing accessibility of public resources and services that serve all covered populations
Current	562	73%
Target after 5 years	703	73%
Target after 10 years	1124	73%

5.4 Implementation Strategy: Closing the Digital Divide In New York State

Building on initiatives detailed under **2.3 Alignment with Existing Efforts to Improve Outcomes, 3.2 Needs Assessment by Covered Population, 3.2.3 Digital Equity Needs, Barriers, and Asset Gap Analysis, and 5.0 Implementation**, ConnectALL’s SDEP implementation strategy addresses barriers for Covered Populations across New York State through the proposed actions detailed under each measurable objective. Actions to reduce the gaps are not exhaustive; ConnectALL will continue to source and refine proposals for impact in partnership with diverse, essential organizations, businesses, communities, entities, First Nations, coalitions, and individuals. Like NTIA, ConnectALL knows that “achieving digital equity

is a benefit in and of itself,”⁶² with significant potential for socio-economic impacts and closing the digital divide. Informed digital equity grant-making, robust partnerships, and continuous improvement are required to reach goals overtime. Taken together, they strengthen conditions for meaningful access and adoption across the State during the launch and implementation of funding for a robust and sustainable digital equity ecosystem. Along with informed grant docket design, ConnectALL is invested in its existing and emerging partnerships and collaborations. To support ongoing engagement, input, and exchange, ConnectALL will:

- Ensure the Asset Inventory is a living database and directory with assets tagged and mapped across every region; it will be an accessible, open, searchable and editable mechanism for public use; archived and available on ConnectALL’s website
- Support Digital Equity Taskforce, Digital Equity Coalitions and Networks to actively collaborate within and among stakeholders across the State to identify issues, improve practices, and share knowledge for scaling outcomes for Covered Populations; and
- Engage labor organizations, industry, learning institutions, state agencies, regional and county entities, digital equity coalitions and networks, public and private foundations, and research centers in research and evaluation that can perpetuate a strong DE presence across new sectors and BEAD infrastructure, internet connectivity initiatives as well as evolve the DE ecosystem.

A stable, trusted digital equity ecosystem will enable the following shifts, as examples:

Health	Healthcare equity gap undermines resident well-being ⁶³ <> Telehealth initiatives improve wellness; digital health literacy is part of patient care; Accessible, multilingual, and culturally tailored digital health resources, guides, and tutorials are increasingly available for Covered Populations
Employment	Not enough workers have digital skills to satisfy in-demand careers and next-gen business development ⁶⁴ <> Workers and job seekers are skilled and have equitable access to employment; Regional entities, business, and labor organizations expand access to job readiness via digital skills training, credentials, and certifications; employers retain diverse, local talent as technology evolves; Accessible, multilingual, and culturally tailored digital skills resources, guides, and tutorials are increasingly available for Covered Populations
Education	Persistent homework gap <> Quality digital literacy programs in each region of the State, k-12 students have reliable home internet connectivity and device ownership;

⁶² NTIA Internet for All, “Digital Equity Outcomes,” at https://broadbandusa.ntia.doc.gov/sites/default/files/2023-04/Digital_Equity_Outcomes.pdf.

⁶³ “Governor Hochul Announces \$3 Million in New Grants to Expand Access to Telehealth across All New York Regions,” pub. Nov. 2021, at <https://www.governor.ny.gov/news/governor-hochul-announces-3-million-new-grants-expand-access-telehealth-across-all-new-york>. Currently, there are 255 hospitals of which 188 operate emergency departments, at <https://profiles.health.ny.gov/directory/hospitals>.

⁶⁴ National Skills Foundation, *New York Skills Mismatch*, (accessed Jan. 30, 2024), at <https://nationalskillscoalition.org/skills-mismatch/new-york-skills-mismatch/>.

	Accessible, multilingual, and culturally tailored digital literacy and cyber security resources, guides, and tutorials are increasingly available for Covered Populations
Government Services	Gov. services are increasingly digital (ex: licenses, housing and unemployment assistance, loans), posing access barriers <> Equitable digital transformation is supported by accessible, multilingual, and culturally tailored resources, guides, and tutorials for Covered Populations
Civic Engagement	New Yorkers, particularly youth, need holistic service leadership opportunities ⁶⁵ <> Digital navigation and stewardship pathways support civic engagement; Accessible, multilingual, and culturally tailored digital benefit resources, guides, and tutorials are increasingly available for Covered Populations

5.5 Implementation Strategy: Proposed Timeline

	QTR 1	QTR 2	QTR 3	QTR 4	Funds Spent
2024	Final New York State Digital Equity Plan submission to NTIA	NTIA Capacity Grant NOFO released Convene stakeholders Use Asset Inventory baseline as preliminary regional ecosystem map	New York State DE Capacity Grant submission to NTIA NTIA DE Capacity Grant award TBD Docket design Convene stakeholders Update baseline	Docket design approvals Convene stakeholders Grants Tech Assistance clinics DE Capacity Grant 2025-2026 RFP launch	0%
	Year 0: Inventory of 964 assets represents the measure of baseline capacity for New York				

⁶⁵ “Governor Hochul Unveils Sixth Proposal of 2024 State of the State: Inspire Stronger Communities Through Public Service Opportunities With the New Office of Service and Civic Engagement Led by Lieutenant Governor Delgado,” pub. Jan. 2024, at <https://www.governor.ny.gov/news/governor-hochul-unveils-sixth-proposal-2024-state-state-inspire-stronger-communities>.

2025	DE Capacity Grant 2025-2026 RFP intake Data validation Application review/scoring	ConnectALL awards DE Capacity Grants 2025-2026 Grants management Projects Begin	Grants management Site visits and Formative assessments Baseline updates/mapping	Grants management EOY reporting Convene stakeholders for Year 1 review	25%
Year 1: Inventory of 964 assets increase by approximately 5%					
2026	Mid-cycle evaluations Grants management	Grants management Site visits Baseline updates/mapping	2027-2029 RFP docket design Convene stakeholders Formative assessments	Grants management EOY reporting Convene stakeholders for Year 2 review Summative evaluation NYS 2027-2029 RFP launch	25%
Year 2: Inventory of 1,012 assets increase by approximately 5%					
2027	NYS 2027-2029 RFP intake Data validation Application review and scoring	NYS 2027-2029 RFP awards Grants managements	Grants managements Site visits and Formative assessments Baseline updates and continued mapping	Grants managements EOY reporting Convene stakeholders	20%

				Summative evaluation	
	Year 3: Inventory of 1,063 assets increase by approximately 5%				
2028	Mid-cycle evaluations	Grants management	Grants management	Grants management	20%
	Grants managements	Site visits	Formative assessments	EOY reporting	
		Baseline updates and continued mapping		Convene stakeholders	
	Year 4: Inventory of 1,116 assets increase by approximately 5%				
2029	Grants managements	Grants management	Grants managements	Capacity Grants close	10%
	Site visits	Convene stakeholders	Convene stakeholders	Final Evaluations	
		Baseline updates and continued mapping	Baseline updates and continued mapping		
	Year 5: Inventory of 1,178 assets increase by approximately 5%				
	TOTAL: 1,205 assets meet a projected 25% increase of capacity within the DE ecosystem from Year 0				100%

5.6 Implementation Strategy: Evaluation

ConnectALL will conduct periodic assessment of the Plan’s implementation towards removing barriers to broadband use and closing New York State’s digital divide for all New Yorkers, especially Covered Populations. ConnectALL will draw on statewide and federal data⁶⁶ as collected and reported by subgrantees and via data collection, including a refresh of the Digital Equity survey every two years. ConnectALL will work with Digital Equity Coalitions, libraries, networks, and community anchor institutions, as well as labor entities, workforce agencies, academic, Tribal, and regional partners to undertake formative and summative evaluation⁶⁷ research that measures and documents progress towards the Outcome Areas.⁶⁸ ConnectALL will publicize the results of these analyses to confirm or adjust course for strategy generally.

ConnectALL will work with partners across the State to draft, analyze and document data-driven and community-driven assessment of the Plan’s implementation. ConnectALL will use formative assessments to determine progress towards a milestone, require stakeholder guidance, and be regularly scheduled. ConnectALL will utilize relationships and partners that shaped the Plan. The evolving Asset Inventory will offer in-progress and public mechanism for updates, corrections, and direction for digital equity goals for devices, job readiness training programs, digital literacy courses, assistive options, and more.

With academic and regional partners, ConnectALL will undertake summative assessment of the Plan on an annual basis to track progress, blockers, and lessons learned. Summative assessment and reporting will be cumulative and provide rationale for continuance or shifts in tactics driving towards long-term impacts. ConnectALL will gauge actual improvements and as a policy instrument, support where and how future funding should be invested to maintain efforts narrowing the digital divide. ConnectALL will enact transparent reporting regarding progress for accountability to the public. Partners will be engaged in relevant instrument design, definitional work (what features should be assessed for regional impact, etc.), and reviews of findings, where feasible. ConnectALL will measure, analyze, and respond to interventions on the digital equity ecosystem and residents, especially Covered Populations, through periodic assessment.

The table below provides sample steps ConnectALL may take to surface barriers and localized needs that require adaptation, funding, and policy intervention while informing ConnectALL’s strategy overall: ground investments in an asset-based approach; strengthen networks to share resources and take coordinated action; build alignment and awareness; and sharpen and socializes a digital equity lens.

⁶⁶ Systems of data collection will involve identifying, monitoring, and analyzing internal and external datasets that draw from markets, vendors, contract reporting, as well as relevant public data sets. Techniques include data quality control assessments, GIS data visualizations/mapping along with qualitative methods for granular perspective.

⁶⁷ See <https://poorvucenter.yale.edu/Formative-Summative-Assessments>

⁶⁸ Methods and focus areas reflect New York SDEP Chapter 5 “impact metrics.” For further guidance on assessing digital equity impacts, see Internet4ALL, https://broadbandusa.ntia.doc.gov/sites/default/files/2023-04/Digital_Equity_Outcomes.pdf; Benton Foundation, *A Checklist for Evaluating Your State's Digital Equity Vision*, <https://www.benton.org/blog/checklist-evaluating-your-states-digital-equity-vision>; Rhinesmith et al., *Developing a Digital Equity Theory of Change with Tech Goes Home*, DERC, https://www.techgoeshome.org/files/ugd/f50bc7_b528e07f233e45bbaedfc227fe7b9053.pdf.

Outcome	Activity	Covered Population	Method	ConnectALL	Partners	Cycle
All	expansion of device programs	All	landscape analysis	data review	data collection and analysis	quarterly
Education, Workforce and Health	scale assistive tech access and compliance	Aging Individuals, Veterans, Individuals with Disabilities	accessibility audit	funder	public libraries; regional entities	2024 launch; periodic
All	distribution and uptake of digital skills trainings	All	asset inventory; survey; public engagement	data collection; convener	facilitators; research partners	every 6-9 months
All	increase in multilingual and accessible digital literacy courses and materials	Individuals with Limited English, Aging Individuals, Individuals with Disabilities	focus groups; survey; localized research	funder	facilitators; research partners	annual
All	increased home-based internet subscriptions using subsidies	All	grantee and market monitoring; audits	data collection; review	ISPs	quarterly
All	improving CAI, CBO, DEC digital equity capacity	All	focus groups; survey; localized research; funding portfolio review; convenings	research, interviews, site visits and regional convenings	facilitators; research partners	annual
All	developing digital navigation /stewardship pathways	All	Interviews; focus groups; survey; localized research	funder, facilitating dialogue, relationships with partners	facilitators; research partners	every 6-9 months
Education, Workforce Development	building alignment/awareness of digital equity resources (accommodation guidance, toolkits, etc.).	All	Interviews; focus groups; survey; localized research	funder, facilitating dialogue, relationships among partners	facilitators; research partners	every 6-9 months

ConnectALL will monitor ongoing changes in its economic and workforce development goals, plans and initiatives, as well as accessibility of educational resources, improvements in access to and delivery of health services, increases in civic and social engagements; and delivery of accessible, navigable public resources. ConnectALL will work with academic and regional partners experienced in sector-based longitudinal analysis to produce an evaluation of changes in each of these outcome categories. ConnectALL will also consider the utility of federal data collection and transparency efforts,⁶⁹ and where relevant and feasible, ConnectALL will examine data generated by its cross-cutting infrastructure initiatives under BEAD to gauge reporting on digital equity priorities (ex: employment).

Sample Key Questions

While this is not an exhaustive list, the questions below speak to interdependencies that ConnectALL will be looking to assess and design against for effective SDEP implementation over time:

- How many more households statewide have affordable connectivity to reliable, high-speed broadband and what is the correlation to increased engagement in digital health care, education and job training, economic growth, and civic participation? Are they equitably distributed to address historic and persistent need in both rural and urban areas?
- How many more locations host more than one ISP option? What is the evidentiary impact on affordability for households and commercial businesses? Does this market shift increase availability of unbundled, affordable broadband service? Uptake of subsidies?
- What is the increase in households with suitable internet-enabled devices at home, and what contributed to that uptake (ex: better troubleshooting support, refurbishment, subsidies, etc.)? Are assistive technologies more available and are communities aware of that option?
- Through tailored and targeted programs and partnerships, are New Yorkers more confident in their digital skills and literacies? What factors support that (ex: the public digital equity asset inventory, more multilingual materials and trainers, culturally appropriate instruction, 1:1 peer support, etc.)? Are more public-school systems adopting digital hygiene and online safety curricula?
- Do New Yorkers feel more empowered with tools and skills to navigate risks and avoid harms associated with digital environments?
- What actions, if any, have changed public engagement with government benefits, services, and civic participation (ex: universal accessibility standards across government websites, targeted campaigns designed to foster trust in online public systems, etc.)?

⁶⁹ Examples include the *Broadband Data Collection* map that seeks to identify “unserved and underserved communities most in need of funding for high-speed internet infrastructure investments,” at <https://www.fcc.gov/BroadbandData>; and *Broadband Consumer Labels*, which requires the majority of providers to “display at the point of sale clear, easy-to-understand, and accurate information about the cost and performance of broadband services,” at <https://www.fcc.gov/broadbandlabels>.

- Are digital equity coalitions healthy and what supports do they require to address emerging digital challenges over time?
- What SDEP-related delivery models, pilots, projects and collaborations should be scaled and why? Have new capacities for digital equity been created? For example, how should stewardship be maintained for local capacity, what interventions scale telehealth adoption, and what modes of accessibility increase benefit access for Covered Populations?

ConnectALL will also consider revising and adding questions considering its stated principles of equity, performance, choice, affordability, and safety towards improving conditions necessary to advance digital equity in New York State for all residents.

Overall, ConnectALL's approach and findings will enable plan sustainability and a holistic design for a precise Digital Equity Capacity Grant Program application with aligned goals, processes, and priorities for grant docket development and funding distribution that targets need and builds on aligned infrastructure deployment commitments. Regarding process, ConnectALL will award and administer funding using Empire State Development's standard procedures and documentation.

6.0

Conclusion

6.0 Conclusion

ConnectALL is working to end the digital divide in New York, thereby promoting more equitable access to economic opportunity, public services, healthcare, education, and civic participation for all New Yorkers. The work of ConnectALL is guided by five core principles of broadband equity, performance, choice, affordability, and safety. These principles have guided the State's broadband and digital equity planning process and are reflected in the diverse strategies presented in this report to end the digital divide. Through robust engagement with community groups and individuals across the state, ConnectALL has developed this plan to address digital inequity through targeted strategies that support ongoing and successful community-led work in this space.

Through multiple methods of engagement, the New York State Digital Equity Plan has identified clear gaps in broadband affordability and availability, device and device support accessibility, digital literacy, privacy & cybersecurity, and the accessibility of government resources across the state—especially among covered populations. While these gaps are of concern, experienced and innovative assets already operate programs across the state to help close the digital divide by increasing broadband accessibility and affordability, accessibility of devices, digital literacy, and more. ConnectALL will continue to refine its understanding and documentation of these resources within the Digital Equity Asset Inventory.

Based on an understanding of the broadband and digital equity gaps facing New Yorkers, ConnectALL has developed strategies to ensure every New Yorker has equal opportunity to safely reap the benefits of the digital world. The New York State Digital Equity Plan is a first step to ensure that the funding available through the Digital Equity Act creates a meaningful and sustainable impact across New York State. As grant funding becomes available in 2024, ConnectALL will continue to work with partners across the state to fulfill the strategies outlined in this plan and evaluate the State's progress over time towards its measurable objectives, all to the ultimate objective of ending the digital divide in New York.

7.0

Research Methodology

7.0 Research Methodology

The goals of the State’s survey strategy were to:

1. Create a representative sample of each Covered Population relative to the actual population distribution in the state, as determined by the American Community Survey; and
2. Allow the State to understand variances between the responses of each Covered Population and those of the full population of the survey sample.

To create a representative sample, ConnectALL used American Community Survey 5-year estimates (2009-2022) to understand actual population distribution among Covered Populations as defined by the Digital Equity Act Statute. Survey response targets based on actual population distribution and achieved through strategic outreach efforts, as described below in Section 7.1. Where response rates did not fully match actual population distribution according to ACS, statistical weighting was applied to responses as described in Section 7.2.

To understand needs and barriers to digital equity for each Covered Population relative to all respondents, ConnectALL compared the responses of each Covered Population to those of the full response sample. These variances were determined with the statistical methods described below in Section 7.2, and used to create baseline statistics for each Covered Population per each Measurable Objective area as defined by the Digital Equity Act.

7.1 Survey Distribution Methodology

ConnectALL, in partnership with Digital Equity Coalitions (DECs), as described in *4. Stakeholder Engagement*, secured 5,781 New York State Internet Access Survey responses (after non-valid or incomplete responses were removed, as described below).

Surveys were supplemented by focus groups, listening sessions, and town hall meetings to build a mixed-methods approach to understanding needs and barriers among covered populations. The responses reflect the diversity of the population of New York State due to a careful focus on and outreach to historically underrepresented, marginalized groups. To achieve this level of representation, ConnectALL pursued two strategies:

1. **Survey distribution and response targets.** ConnectALL collaborated with DECs to distribute surveys across each of New York State’s ten regions and established response targets—by region and by estimated covered population in each region—that would ensure unweighted survey responses reflected the diversity of residents in each region. This approach is further described in this section, below.

2. **Survey data weighting.** After closing the survey, ConnectALL weighted survey responses to increase the degree to which the sample matched the census-recorded distribution of covered populations by region in New York State. This approach is further described in **Chapter 7.2 Survey Data Analysis Methodology**.

The survey instrument is included in *SDEP Appendices*.

Survey Sample

ConnectALL developed target response rates for the Survey based on regional population demographics from American Community Survey (ACS) 2022 5-Year Estimates to ensure that all covered populations (statewide and by region) and regions would be equitably represented in statewide survey data.

Due to the efforts of DECs described in Chapter 4, the number of Survey responses by region successfully exceeded targets established by region and by covered population within each region.

Table:12 Survey Sample (Unweighted) Descriptive Statistics: Regions

Region	Target	Target Percentage	Actual Total	Actual Percentage
Capital Region	110	6%	422	7.3%
Central NY	78	4%	158	2.7%
Finger Lakes	121	6%	300	5.2%
Long Island	290	15%	919	15.9%
Mid-Hudson	138	7%	793	13.7%
Mohawk Valley	48	2%	304	5.3%
North Country	42	2%	207	3.6%
NYC - Bronx County (Bronx)	146	7%	287	5.0%
NYC - Kings County (Brooklyn)	270	14%	624	10.8%
NYC - New York County (Manhattan)	166	8%	298	5.2%
NYC - Queens County (Queens)	238	12%	509	8.8%
NYC - Staten Island (Richmond County)	49	2%	112	1.9%
Southern Tier	64	3%	249	4.3%
Westchester County	99	5%	238	4.1%
Western NY	141	7%	230	4.0%
Unknown*	NA		131	2.3%
Statewide	2000		5,781	

* “Unknown” region respondents did not provide a zip code or county but did affirm they lived in New York State. Regional data in **Chapter 3.2.2** does not include Unknowns, but the snapshot for the overall state does incorporate respondents whose region was unknown.

** “Actual total” reflects totals by region after Survey response data was cleaned and respondents were sorted into regions by zip code, as described in Chapter 7.2.

Table:13 Survey Sample (Unweighted) Descriptive Statistics: Covered Populations

Covered population*	Target	Actual Survey Total	Actual Total Percentage
Aging Individuals	468	2,261	39%
Individuals with Language Barriers	116	550	10%
Individuals in Low Income Households	267	673	12%
Racial and Ethnic Minorities	869	1,590	28%
Rural Inhabitants **	230	2358	15%
Veterans	87	380	7%
Individuals with Disabilities	243	847	15%
Not in a Covered Population	N/A	781	30%

*The covered population question was a check-all question, allowing individuals to select more than one population. Therefore, totals do not add up to 5,781 individual responses.

**2,939 respondents self-reported as living in a rural area. However, survey analysis applied a systematic approach to designating respondents as either rural or urban by mapping responses per zip code using the Rural Electrification Act of 1936 definition (see 7.1.2). For respondents in zip codes that straddled urban and rural areas, statistical analysis split respondents into separate observations for the purposes of linear regression analysis in a manner described in 7.1.2. However, exclusively for the purposes of the table directly above, respondents in counties that straddled one or more urban and rural counties were allocated to the county in which the zip code had the highest residential address ratio (per the HUD USPS Zip Code Crosswalk).⁷⁰

Limitations

- **Incarcerated Individuals:** The survey did not include a question about a respondent’s status as a formerly incarcerated individual, due to the vulnerability and privacy of that

⁷⁰ HUD Office of Policy Development and Research. “HUD USPS ZIP Code Crosswalk Files.” Accessed October 13, 2023. https://www.huduser.gov/portal/datasets/usps_crosswalk.html.

population. Focus groups were used to gather information about the unique broadband and digital equity needs and barriers of formerly incarcerated individuals.

- **Individuals with Language Barriers:** Although both digital and paper versions of the survey were made available, most announcements about the survey were made in digital or physical print, and it was not possible to complete the survey orally unless the respondent knew to use the text reading functionality made available in the online version of the survey. This design limitation likely led to fewer limited-literacy individuals completing the survey.

To mitigate this concern about under-sampling, focus groups were used to gather additional information about the unique broadband and digital equity needs and barriers of New Yorkers with language barriers.

7.2 Survey Data Analysis Methodology

This section describes the approach used to clean survey results to ensure validity, weight remaining results to ensure the survey sample was representative of the state’s actual population, and accurately classify respondents as either urban or rural based on the 1936 Rural Electrification Act classification of “rural” areas as 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. A city, town, or incorporated area that has a population of greater than 20,000 inhabitants. The section also describes limitations to the survey data and weighting methodology.

Cleaning Methodology

To ensure analysis only considered valid survey results, the following steps were used to remove invalid response:

Table:14 Survey Data Cleaning Methodology

Cleaning Step	Responses Removed
Remove observations where the respondent answered “No” to “Do you reside in New York and are you 18 or older?”	67 responses
Remove observations where the respondent answered “Under 18” or did not provide an answer to “What is your age?”	29 responses

Cleaning Step	Responses Removed
Remove observations with zip codes outside of New York	61 responses
Remove observations where the submission was not completed	2,873 responses
Remaining responses	5,781 responses

Weighting Methodology

In order to compare survey results for covered populations and regions with statewide responses and administrative data for the state, it was necessary to achieve a survey response sample that was as representative as possible of the state’s population—with respect to covered population and regions. Response targets were set by identifying population shares of covered populations per County and aggregating to the regional level. Successful fulfillment of response rate targets (described above) resulted in a representative sample of responses generally within 1-5% of actual population distribution by region and by covered population, with the exception of aging individuals, incarcerated individuals, racial and ethnic minorities, and individuals with language barriers (due to the specific, systematic sampling limitations discussed above).

To ensure a survey sample that was more representative of the state’s population, “statistical raking” was used to calculate sampling weights that conformed distribution to the marginal distribution for selected variables.⁷¹ In other words, when the sample size for a covered population or region deviated significantly (more than 5%) from the actual proportion of that covered population or region relative to the overall population according to ACS 2020 data (and the statutorily required, definition of “rural inhabitants” described below), then the sample was weighted to better conform to these actual population distributions. Weighting did not refer to DEAPV data on covered populations because it was published after the Survey data analysis was completed.

Weighting entailed the following steps:

- Assign a county to each respondent based on their zip code reported compared to county geography using the Department of [Housing and Urban Development’s USPS Zip Code Crosswalk](#).⁷² Most zip codes fell within a single county. However, if a zip code spanned

⁷¹ “Raking” describes a process by which an analysis identifies a set of variables where the population distribution is known (e.g., the distribution of covered populations per census data) and then iteratively adjusts the weighting for each sample until the sample distribution aligns with the known population for those variables.

⁷² “HUD USPS Zip Code Crosswalk Files.” [Supra](#).

multiple counties, the respondent was split into one observation per county. Split observations for a single respondent each had a different weighting factor that added up to the total weight assigned to the respondent during the weighting process.

- Using 2020 ACS data, calculate the proportion of each county’s covered populations as a percentage of the total New York state population.
- Aggregation of county-level results to regional geography.
- Use *R* package *anesrake*, rake the data on aging individuals, racial minorities, and individuals with language barriers, and regions. Assign weights to the data based on raking results. Confirm the multiplied weights add up to the original observation count of the survey data. (The remaining covered populations had survey proportions within 5% of the ACS population proportions and were not raked.)

Ultimately, weighting brought the survey sample distribution for covered populations into alignment with covered population distributions measured by the Digital Equity Population Viewer with four exceptions:

1. Formerly incarcerated individuals: the survey did not ask individuals to identify themselves as members of this covered population, as discussed above.
2. Individuals with language barriers: Analysis relied on ACS 2020 census data to establish regional response targets by Covered Population prior to the Digital Equity Act Population Viewer being publicly available. The response rate for individuals with language barriers was calculated using ACS 2021 5-Year (2016-2020) estimates of the population of English-language learners by region. However, the response rate did not include people with low English literacy (the DEAPV later imputed via 2017 Program for the International Assessment of Adult Competencies data and 2012/2014/2017 PIAAC State and County Small Area Estimates of Adult Skills on Literacy and Numeracy from the National Center for Education Statistics.⁷³ Response targets under-weighted those with low English literacy.

Furthermore, the design of the survey made it difficult to evaluate the representativeness of the sample of individuals with language barriers. The survey asked whether a respondent was a member of the “language barriers” category by asking “Do you or anyone in your household have difficulty with reading, writing, or speaking in English?” However, survey respondents did not differentiate between having limited English *speaking* proficiency and limited English *literacy*.

⁷³ U.S. Census Bureau. “File Layouts for Total Covered Populations.” https://www2.census.gov/programs-surveys/demo/technical-documentation/community-resilience/total_covered_pop_file_layout.pdf.

3. Racial and ethnic minorities: moderate under-sampling led to a weighted sample that approached DEAPV distributions but did not close the gap, reflecting the fact that the survey did not reach enough racial and ethnic minorities.
4. Rural inhabitants: Classification according to the Rural Electrification Act of 1936 described above.

Table:15 Comparison Between Weighted Survey Responses and Digital Equity Act Population Viewer Populations

Sample/ Population	Weighted Survey Responses	Weighted Responses Percentage	DEAPV Population	DEAPV Percentage	Difference
All Respondents	5,781		19,453,561		
Aging Individuals	1,362	23.6%	4,381,353	22.5%	1.1%
Individuals with Disabilities	688	11.9%	2,361,518	12.1%	-0.3%
Individuals with Language Barriers	439	7.6%	5,116,163	26.3%	-18.4%
Low-Income Households	1,216	21%	4,121,851	21.2%	-0.2%
Racial and Ethnic Minorities	2,671	46.2%	8,688,507	44.7%	2.5%
Rural Inhabitants	1,145	19.8%	3,876,346	19.9%	-0.1%
Veterans	231	4%	705,924	3.6%	0.4%
Individuals not in a Covered Population	1,139	19.7%	3,723,561	19.1%	0.6%

**Digital Equity Act Population Viewer is an interactive collection of maps created by the NTIA and the U.S. Census Bureau that demonstrate the distribution of covered populations as well as broadband internet availability and adoption statistics by state and county geographies.*

Determining Rural versus Urban Respondents

The State identified rural survey respondents by using the criteria set out in the 1936 Rural Electrification Act, as laid out in the statutory definition related to Covered Populations, by mapping responses by self-reported zip code and then overlaying a shapefile of urban places as defined by the Act. All zip codes with an urban percent equal to 0% were assigned rural and all zip codes with an urban percent equal to 100% were assigned urban.⁷⁴

For respondents living in a zip code that does overlap geographically with urban areas, a manual estimate of the geographic percentage of urban areas overlap in the zip code determined the number of respondents classified as rural. For example, if 26 people responded from zip code 14850 and that zip code is made up of approximately 35% urban area, per Census, then 9 of the respondents were classified as urban and 17 were classified as rural.

There are 66 zip codes in New York State that only have one respondent and have an urban percent not equal to 0% or 100%. For example, for zip code 12345, it is 30% rural and there is only 1 respondent. Of these 66 zip codes, approximately 60% were assigned rural. As the sample size gets larger, the percent of respondents assigned to rural more closely aligns to the actual rural distribution.

Statistical Analysis Methodology

For the purposes of comparing (i) a given covered population or region with (ii) all other respondents, linear regression in Stata was used to measure how much covered populations or regions differed from all other respondents. The linear regression tests whether an independent variable—either (i) classification as a member of a covered population or (ii) residency in a certain region—predicts a dependent variable, such as likelihood of access to broadband at home, internet-enabled devices at home, etc.

To reject the “null hypothesis” that there is no predictive relationship between the independent variable and dependent variable and that the covered population or region is like the rest of the state, analysis used a 95% confidence interval as a threshold for determining whether the two variables had a linear, predictive relationship.

The linear regression considered 5,781 survey respondents. For those respondents whose zip codes straddled multiple counties, the regression analysis considered those respondents as a set of separate observations, one for each overlapping county. When this occurred, the data points each had a different weighting factor that added up to the total weight assigned to the respondent during the weighting process. Stata regression analysis uses these individual observations (including multiple observations assigned to one respondent split across county

⁷⁴ TBD

lines) to calculate the results and used these results to draw conclusions about the 5,781 respondents.⁷⁵

Survey Data Analysis Limitations

The survey distribution strategy introduces inherent limitations into the data, although ConnectALL undertook efforts to minimize these limitations and ensure the representativeness of the sample (described above).

- **Sampling Error**: Survey responses under-sampled aging individuals, formerly incarcerated individuals, individuals with language barriers, and racial and ethnic minorities. Survey analysis used statistical raking described above to mitigate but not entirely eliminate this sampling limitation, as discussed above. For groups that remain significantly under-sampled—specifically formerly incarcerated individuals and individuals with language barriers—focus groups were intended to generate more qualitative data about the experiences of and needs of these populations.
- **Format variety**: the State distributed the survey in multiple formats (online, paper, multiple languages) in order to increase the accessibility of the survey. However, the majority of completed surveys (98%) were completed online, suggesting a potential bias toward respondents with access to the internet at home or at a local organization or asset.
- **Selection bias**: those who chose to take the survey or participate in focus groups might not be representative of the population intended to be analyzed. Furthermore, outreach to potential respondents was not randomized.
- **Survey Fatigue**: The State and local school boards introduced several surveys to gauge the state of broadband and digital equity throughout the COVID-19 Pandemic. Being surveyed multiple times on the same issues might have reduced the pool of respondents. In addition, people might have accessed the survey but could not spend the estimated 10-15 minutes on survey completion.

⁷⁵ This approach to weighted regression analysis across multiple observations for a single respondent is described here: DuMouchel, William H., and Greg J. Duncan. "Using Sample Survey Weights in Multiple Regression Analyses of Stratified Samples." *Journal of the American Statistical Association* 78, no. 383 (1983): 535–43. <https://doi.org/10.2307/2288115>.

7.3 Focus Group Methodology

The DECs that ConnectALL partnered with, as described in **Chapter 4.0 Stakeholder Engagement**, conducted focus groups with covered populations throughout their region for more in-depth and population specific discussion of challenges and barriers to broadband access and adoption. DECs across the state conducted 47 focus groups engaging 721 individuals. Department of Youth & Community Development worked closely with OATS to gather data in New York City.

Table 16: Count of Focus Groups Conducted by State Region

Region	Focus Group Total
Capital Region	4
Central NY	3
Finger Lakes	3
Long Island	3
Mid-Hudson	5
Mohawk Valley	5
North Country	3
New York City	11
Southern Tier	3
Westchester County	3
Western NY	4
Statewide	47

Table 17: Count of Focus Groups Conducted by Covered Population

Covered population	Focus Group Total
Aging Individuals	8
Individuals with Language Barriers	5
Low Income Households	7
Racial and Ethnic Minorities	7
Rural Inhabitants	7
Veterans	4
Individuals with Disabilities	5
Formerly Incarcerated Individuals	4

ConnectALL developed population targets for each region based on regional population demographics to ensure that all covered populations were engaged. This methodology prioritized: 1) covered populations with an outsized share relative to the state, with a hypothesis that focus groups with concentrated population would produce robust findings; 2) covered populations with an undersized share relative to the state, with the hypothesis that these groups would be underrepresented in survey data from the region; and 3) the experience and track record of DECs in working with specific covered populations or organizations serving specific covered populations in order to ensure that recruitment and facilitation was viable. The purpose of these focus groups was to add further nuance, color, and depth to the data being collected via the New York State Internet Access Survey, especially with regard to covered populations who might be underrepresented in survey responses. The questions in the script were intentionally aligned with those in the survey, but with more time allocated to hear anecdotes and capture nuance and sentiments from participants who might have multiple, overlapping barriers to completing the full survey.

The focus group notes were analyzed using a codebook that was initially developed based on the five measurable objectives found in the NTIA's Digital Equity Act Notice of Funding Opportunity (NOFO). The five measurable objectives were further broken down into the following "parent" categories:

- Internet availability
- Internet affordability
- Device availability

- Device affordability
- Technical support
- Digital literacy
- Internet safety
- Accessibility of state online services
- Digital equity assets & strategies

The development of the codebook was an iterative process, with new child codes being added after finding recurring themes that the initial codebook did not capture. These additions to the codebook were then applied in a second round of review and coding of the focus group notes.

The table below shows examples of “parent” and “child” codes that were used to analyze the focus group data:

Table 18: New York State Focus Group Codebook Examples

Parent Code	Child Code	Definition
Internet availability	Data caps limit access	Periodic caps (e.g., monthly wireless data plans) limit the ability for people to consistently access internet or meet the needs of their households
Device availability	Smartphone only	Residents only have access to smartphones
Technical Support	Need for multilingual support	There is a need for technical support available in multiple languages
Digital Equity Assets & Strategies	Community centers provide internet	People go to local community centers/institutions (e.g., public libraries) in order to access the internet

7.4 Intersectionality of Covered Populations

Using the U.S. Census' PUMS (Public Use Microdata Sample) tool, we analyzed the prevalence of overlap between covered populations. Data found in PUMS is based on individual responses rather than aggregated data with predetermined parameters, allowing us to analyze demographics for individuals who may fall under more than one covered population.

Since PUMS is a sample and not a full census, the data contains sampling errors. Any estimates derived from PUMS data, especially from small subpopulations, may have a larger margin of error. Additionally, defining 'rural' is complex. While many methods, including the methodology used in the report, use county-based definitions (discussed above), PUMS data is aggregated at the level of geographies called Public Use Microdata Areas (PUMAs). Due to these complexities and the lack of a clear 'rural' designation in PUMS, we've chosen to exclude this category from our PUMS demographic analysis.

Each row of the matrix represents a distinct category, such as 'aging' or 'individuals with disabilities,' with corresponding values indicating the percentage of individuals that fall into that category. For instance, if we look at the 'aging' row in the Covered Population Matrix table and find the value 8%, this tells us that 8% of the total NYS population are individuals who are both aging and a racial or ethnic minority.

Table 19: Analysis of Two-Way Intersectionality Among Covered Populations in New York State (excluding incarcerated individuals)

	Aging Individuals	Racial or Ethnic Minorities	Low Income Households	Veterans	Individuals with Disabilities	Individuals with Language Barriers
Aging Individuals	23%	8%	4%	2%	7%	2%
Racial or Ethnic Minorities	8%	45%	12%	1%	5%	6%
Individuals Living in Low-Income Households	4%	12%	20%	0%	4%	3%
Veterans	2%	1%	0%	3%	1%	0%
Individuals with Disabilities	7%	5%	4%	1%	12%	1%
Individuals with Language Barriers	2%	6%	3%	0%	1%	7%

PUMS demographic categories:

- Aging (AGEP): We classified respondents as 'aging' if they were aged 60 or above.
- Racial/ethnic minority (HISP, RAC2P): Individuals were identified as a racial or ethnic minority if their self-reported race or ethnicity was anything other than non-Latino white.
- Low-Income Status (POVPIP): Respondents falling at or below 150% of the poverty line were labeled as 'low-income'.
- Veteran Status (VPS): Any respondent who served in the military, with any type of "Veteran period of service."
- Disability Status (DIS): Any respondent who reported they have a disability.
- Individuals with Language Barriers (LNGI): any respondent who indicated that "No one in the household 14 and over speaks English only or speaks English 'very well'".

Unfortunately, PUMs data does not capture the portion of New Yorkers that have limited English literacy as a subset of individuals with language barriers. Therefore, the table and analysis above under-reports the portion of New Yorkers with language barriers (26% per the DEAPV) and the portions of New Yorkers that have language barriers and are also members of other covered populations.

7.5 Glossary⁷⁶

Term	Definition
Broadband	According to the Federal Communications Commission (FCC), internet service with a download speed of at least 25 megabits per second (Mbps) and an upload speed of at least 3 megabits per second (Mbps) qualifies as broadband. Internet service that's fast enough for users to take advantage of just about everything the internet has to offer.
Covered Population	Individuals who live in covered households; aging individuals; incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility; veterans; individuals with disabilities; individuals with a language barrier" (i.e., those who are English learners and have low levels of literacy), as well as "individuals who are members of a racial or ethnic minority group; and individuals who primarily reside in a rural area."

⁷⁶ All footnote citations to definition sources to be added.

Community Anchor Institution	A public school, a public or multi-family housing authority, a library, a medical or healthcare provider, a community college or other institution of higher education, a state library agency, and any other non-profit or governmental community support organization.
Digital Divide	<p>The gap between those who have affordable access, skills, and support to effectively engage online and those who do not.</p> <p>This gap disproportionately affects people of color, Indigenous peoples, households with low incomes, people with disabilities, people in rural areas, and older adults. (NDIA)</p>
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.”
Digital Inclusion	Activities that are necessary to ensure that all individuals “have access to, and the use of, affordable information and communication technologies, such as reliable fixed and wireless 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.” It “includes obtaining access to digital literacy training; the provision of quality technical support; and obtaining basic awareness of measures to ensure online privacy and cybersecurity.”
Digital Literacy	Skills associated with using technology to enable users to find, evaluate, organize, create, and communicate information.
Ecosystem	A combination of programs and policies that meet a geographic community’s unique and diverse needs. Coordinating entities work together in an ecosystem to address all aspects of the digital divide, including affordable broadband, devices, and skills.

Document Change Log

Version	Date Published	Summary of Changes
1.0	November 6, 2023	Initial publication
1.1	November 10, 2023	<ul style="list-style-type: none"> Added subheaders for each regional snapshot in Chapter 3.2.2. Renamed Chapter 7.0 Appendices as “Chapter 7.0 Research Methodology.” Updated references to “SDEP Appendices Part II” to refer to “SDEP Appendices” Added list of tables and list of figures after table of contents.
1.2	November 16, 2023	<ul style="list-style-type: none"> Corrected errors in Table 13: Survey Sample (Unweighted) Descriptive Statistics: Regions and added explanatory note to Table 13. Corrected errors in the count of focus groups by region and covered population.
2.0	March 15, 2024	<ul style="list-style-type: none"> Updated data methodology in line with the statutory definition of “rural.” Regional profiles have been updated as a result and Chapter 7: Methodology describes analysis. Updated Chapter 5 Implementation Strategy to include an evaluation plan, proposed grant project timeline, and a description of New York’s “asset as metric” approach to tracking progress over time. Added responses derived from robust public engagement and comments (ex: supplemental input regarding key Covered Populations such as Formerly Incarcerated Individuals and People with Disabilities) and have integrated all public comments received on the record. Added a glossary of terms to Chapter 7. Added “Coordination of Funding” section.

8.0 Appendix

8.1 Plans, Resources, and Reports

8.1.1 Federal and New York State Plans, Resources, and Reports

The New York State Digital Equity Asset Inventory includes nine plans, resources, or reports developed by New York State or Federal agencies that address digital equity.

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
<p>ACP Enrollment and Claims Tracker</p>	<p>The ACP Funding Summary by Geography file shows a summary of total ACP support claimed by state, county, ZIP code, and congressional district. USAC will continue to update the data on a monthly basis.</p>	<p>Universal Service Administrative Company</p>	<p>2023</p>
<p>Audit: New NY Broadband Program</p>	<p>The objective of this report is to determine whether Empire State Development (ESD) has effectively monitored and managed the New NY Broadband Program and whether the Program has achieved its overall goals. The audit covered the period from January 2016 through November 2021. This audit points out the ways that the program fell short of achieving its overall goal of providing statewide broadband availability.</p> <p>Key recommendations include:</p> <ul style="list-style-type: none"> • Work with ISPs to complete outstanding projects as soon as practical. • Ensure any future State-funded projects are based on reliable and accurate broadband availability data and utilize technologies 	<p>NY State Comptroller</p>	<p>2022</p>

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	providing reliable high-speed Internet.		
Indicators of Broadband Need	The Indicators of Broadband Need map was created by the National Telecommunications and Information Administration (NTIA). The map uses several different data sources to show information on broadband availability within the United States. Layers in this map were created using data sourced from the American Community Survey collected by the U.S. Census, Measurement Lab (M-Lab), Ookla, Microsoft and the Federal Communications Commission (FCC). <i>(Requires sign-in to NTIA ArcGIS online.)</i>	United States Department of Commerce, National Telecommunications and Information Administration (NTIA)	2020
New York State Digital Equity Portal Final Report	<p>The report summarizes the usefulness of the state's Digital Equity Portal and proposes how it can be useful in addressing the state's digital divide.</p> <p>Key recommendations include:</p> <ul style="list-style-type: none"> • Deepen the impact of the portal for local communities by launching the portal with sustained and ongoing outreach and training so that local stakeholders understand how to draw data from the portal. • Ensure that users have a means to share back their own data, stories, and experiences about the digital divide. <p>Create the ability to conduct comparative analysis between different geographies.</p>	New York State Education Department, Cornell University School of Industrial and Labor Relations (ILR), John R. Oishei Foundation, Central New York Digital Inclusion Coalition, Community Tech New York (CTNY), New York Public Library	2021

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
<p>New York State PSC Broadband Map</p>	<p>The interactive map on this site provides users with the ability to explore the State's broadband availability. Search an address to see what internet service providers are available, what type of technology providers are using, what potential speeds are being offered, and explore the links to the providers' websites to see current offers and pricing. Additional information is provided to illustrate what percentage of the State is Served, Underserved, or Unserved pursuant to the Act's definitions.</p>	<p>New York State Public Service Commission</p>	<p>2023</p>
<p>Report On the State of Broadband Access in New York's 22nd Congressional District</p>	<p>This report provides helpful feedback from community members about their access to broadband.</p> <p>Key recommendations include:</p> <ul style="list-style-type: none"> • The FCC must collect better data and target investments where they are truly needed. • Regulators must closely monitor cable and internet companies to ensure they are bringing access to new homes and fulfilling their legal obligations. • There must be stronger oversight to ensure that ISPs are delivering the speeds required when they take government subsidies. • Many of the problems facing customers, such as rising prices and poor customer service, would be fixed with more choices in the market. Free market competition would allow ISPs, including local companies, co-ops, and 	<p>22nd Congressional District</p>	<p>2020</p>

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	municipalities to compete for customers		
Report: Making Strides on Broadband Affordability	<p>This report provides state level data regarding the Emergency Broadband Benefit and Affordable Connectivity Programs.</p> <p>Key recommendations include:</p> <p>New York policymakers should strongly advocate for the continuation of the EBB and ACP with the goal of enrolling all qualified families in the coming years.</p>	NY State Comptroller	2023
Report: Understanding Broadband Challenges in New York State	<p>While the federal government provides funding for state infrastructure projects like road and bridge construction and repair, deployment of broadband infrastructure has largely been the responsibility of states and the private sector. This report provides an overview of the many challenges to broadband affordability and accessibility across the state.</p> <p>Key recommendations include:</p> <ul style="list-style-type: none"> Pursue Universal Availability of Highest-Speed Connections Enhance Access for Low-Income Households Improve Affordability Make New York’s Broadband Strategy Actionable and Accountable 	NY State Comptroller	2021
The Digital Divide in	This document provides an overview of the digital divide in New York State using illustrative and	New York State Council	2022

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
New York State	interactive maps to cover the following topics: Broadband on Scores, Affordable Connectivity Program, Internet Access Under 18, Broadband, New York Access by Income, Internet Access by Race, and NYS ConnectALL	on Children and Families	

8.1.2 County and Municipal Plans, Resources, and Reports

The New York State Digital Equity Asset Inventory includes four plans, resources, or reports developed by County governments that address the unique nature of the digital divide within their communities.

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
Broome County Office for Aging Plan for Services 2022-2023	This report shares the results of a survey of the aging population in Broome County, and other insights about community needs. Some of the survey information, objectives, and planned services help to provide information about the needs and interests of the aging population in the area, regarding digital technology.	Broome County Office for the Aging	2021
Community Access Plan and Funding Strategy for Broadband	The report documents unserved and underserved broadband access, highlights possible infrastructure options and recommendations, and reports of the findings of a community study that highlights affordability as a key barrier to internet use.	Monroe County	2023

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	<p>Report includes recommendations in 5 key areas:</p> <ul style="list-style-type: none"> • Improving internet access • Grant planning • Broadband infrastructure expansion and utilization • Possible fiber expansion of County’s fiber network to underserved areas • Broadband taskforce support and advocacy 		
<p>Community Needs Survey for Steuben County Office for the Aging 2022</p>	<p>This report shares the results of a survey of the aging population in Steuben County from 2022. Some of the questions and answers in this survey help to provide information about the needs and interests of the aging population in the area, regarding digital technology.</p>	<p>Steuben County Office for the Aging</p>	<p>2022</p>
<p>Tompkins County Office for the Aging Needs Assessment, Summary Report</p>	<p>This report shares the results of a needs assessment survey of the aging population in Tompkins County in 2019, and other insights about community needs. Some of the survey information, objectives, and planned services help to provide information about the needs and interests of the aging population in the area, regarding digital technology.</p>	<p>Tompkins County Office for the Aging</p>	<p>2019</p>

8.1.3 Libraries and School Plans, Resources, and Reports

The New York State Digital Equity Asset Inventory includes nine plans, resources, or reports developed by schools and libraries that address the digital divide through the lens and tools of these critical community anchor institutions.

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	<p>Regional and State Levels: Build open and accessible digital equity data portal to guide the decision-making and planning of coalitions, organizations, and funders. Define change metrics and use them to track and evaluate progress.</p>		
<p>Annual Statistical Report of Member Libraries - STLS</p>	<p>This document provides an annual statistical report on Public Libraries in the Southern Tier Library System.</p>	<p>Southern Tier Library System</p>	<p>2022</p>
<p>Creating Healthy Digital Equity Ecosystems in NYC: Maximizing the Benefits of the Internet Master Plan</p>	<p>In January 2020, the New York City Mayor's Office of the Chief Technology Officer (MOCTO) [Now NYC Office of Technology and Innovation (OTI)] published the Internet Master Plan (IMP), which aims to make the internet affordable and inclusive for City residents and presents a vision for universal connectivity across the five boroughs. In support of this mission, the report lays out a framework for identifying important digital equity stakeholders in communities across the city.</p> <p>Key recommendations include:</p> <ul style="list-style-type: none"> • Conceptualize digital equity in a broader context of community justice • Expand the Digital Equity Ecosystem Map to utilize in conjunction with the 	<p>Columbia School of International and Public Affairs (SIPA)</p>	<p>2021</p>

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	<p>implementation of Phase 4 of the Internet Master Plan</p> <ul style="list-style-type: none"> • Involve the community perspective throughout the process, providing a regular platform for MOCTO to listen to and incorporate community input and needs • Facilitate funding for organizations that will be carrying out digital equity work <ul style="list-style-type: none"> • Encourage cross-sector partnerships • Improve public service delivery 		
<p>Digital Divide Index</p>	<p>This tool allows users to see how the digital divide impacts different areas of the state and the country. The Digital Divide Index or DDI ranges in value from 0 to 100, where 100 indicates the highest digital divide. It is composed of two scores, also ranging from 0 to 100: infrastructure/ adoption (INFA) score and socioeconomic (SE) score.</p>	<p>Purdue Center for Regional Development</p>	<p>2021</p>
<p>East New York's Digital Access Needs</p>	<p>BklynConnect is a project of the Brooklyn Public Library (BPL), focusing on connectivity within the community of East New York in Brooklyn. BPL is committed to serving a diverse community in Brooklyn. Through BklynConnect, BPL aims to address the needs of the community in a time</p>	<p>Brooklyn Public Library (BPL)</p>	<p>2017</p>

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	<p>where technological innovations are drastically changing the role of libraries. To cater to the evolving needs of the community, BPL is exploring new models and technologies for engaging with patrons. One opportunity is to provide public Wi-Fi access outside the four walls of the library, utilizing mesh networks, point-to-point networks, or portable hotspots. The overall purpose of BklynConnect is to uncover neighborhood broadband needs collectively, the opportunities for programming/services such as access to information, education digital literacy and inclusion, to collaborate with fellows and to provide a playbook to share strategies and document the research process. This project is made possible in part by the Institute of Museum and Library Services (IMLS) National Leadership Planning Grant.</p> <p>Key recommendations include a goal to increase public Wi-Fi access on commercial corridors, in public parks and plazas, family shelters</p>		

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	and more in East New York.		
<p>Leverage Libraries to Achieve Digital Equity for All</p>	<p>New federal programs and resources through the Infrastructure Investment and Jobs Act (IIJA) provide an unprecedented opportunity to build on the existing infrastructure and expertise of our nation’s libraries to inform state digital equity plans and accelerate broadband adoption and skills building for all nationwide. This report addresses the ways that libraries can be leveraged to address the digital divide.</p> <p>Key recommendations include:</p> <ul style="list-style-type: none"> • State broadband leaders and policymakers: include state library agencies in statewide digital equity planning groups and leverage their unparalleled reach into all public libraries to strengthen communications and outreach statewide; • State and local education agencies: include K-12 school librarians and college and university library leaders in digital equity planning and deployment; • Libraries: increase awareness of their local technology assets to improve coordination across all levels of government and develop 	American Library Association	2022

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	<p>proposals for forthcoming funding programs;</p> <ul style="list-style-type: none"> • Congress: enable sustainable funding for digital equity through measures like the Digital Equity Foundation Act; • Federal agencies: continuously work to reduce administrative and record-keeping barriers that limit participation by small libraries and other community-based entities • National library: support organizations aggregate, amplify and advocate with and for state and local libraries to ensure full participation in digital equity planning and implementation and synthesize and share best practices to create scalable models. 		
<p>New York’s Digital Divide: Examining adoption of internet and computers for the state and its library districts</p>	<p>The COVID-19 pandemic has vividly demonstrated the disadvantages of lacking home internet service. One in 4 households in New York State do not have a foundational tool for internet connectivity – a wireline high-speed internet subscription for their home. These gaps are more pronounced for low-income New Yorkers, aging individuals, and communities of color. Closing these gaps will require an “all hands” approach and public libraries are well positioned to be a team leader. Public libraries</p>	<p>New York Public Library, Technology Policy Institute</p>	<p>2021</p>

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	<p>have always played a role in addressing the digital needs of those with limited means of digital connectivity. They are also highly trusted institutions in the eyes of the public. This positions libraries to play a prominent part in addressing the digital divide, which will persist even as the COVID crisis fades. The following data shines a light on access to digital tools in New York State using 2019 American Community Survey data.</p>		
<p>NYS ARPA digital equity program/awards</p>	<p>In 2021, the Institute of Museum and Library Services (IMLS) provided the New York State Library with \$6,213,213 in federal American Rescue Plan Act (ARPA) funds through the LSTA Grants to States Program. The State Library allocated \$5,514,315 of these federal funds to New York State’s nine regional Reference and Research Library Resources Councils for collaborative regional projects that will advance digital inclusion, encourage library/museum partnerships, and expand student access to digital resources.</p>	<p>New York State Library (NYSL)</p>	<p>2022</p>

8.1.4 Resources by Nonprofits, Philanthropies, and Community Based Organizations

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
<p>Child & Family Well-being in New York State: Addressing Barriers to More Equitable Opportunities</p>	<p>Child and family well-being encompasses economic and housing security, health and educational opportunities, and age-specific and community-based supports. The report ranks New York’s counties with respect to barriers to well-being in each domain and in general. The report helps identify inequalities across counties to inform an equitable recovery from the COVID-19 pandemic.</p>	<p>Citizens' Committee for Children of New York</p>	<p>2023</p>
<p>Closing the Digital Skills Divide</p>	<p>This report provides an analysis of digital skills in the workforce. Despite the high demand for digital skills and the desire for skill building opportunities among workers, many have not had the opportunity to fully develop such skills. These burdens fall unequally on workers and entrepreneurs of color.</p>	<p>National Skills Coalition</p>	<p>2023</p>
<p>Closing the Latino Digital Divide</p>	<p>This White Paper summarizes the development and first</p>	<p>Hispanic Federation</p>	<p>2022</p>

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	implementation year of the Latino Digital Accelerator, including accomplishments, challenges, lessons learned.		
Connecting Rural Older Americans with Technology: Lessons from Senior Planet	This report speaks to the success of the OATS Senior Planet program, a unique partnership in upstate New York that has found promising solutions that combine technology with a human touch.	Older Adults Technology Services (OATS), Inc.	2020
Digital Equity Roadmap	The goal of this report is to inform strategic planning to address both short-term, urgent needs as well as the long-term, underlying structural conditions that have led to digital injustice in the Buffalo-Niagara region.	John R. Oishei Foundation, Community Tech New York (CTNY)	2021
Digital Navigators of the Hudson Valley	This report provides a summary of activities in the Digital Navigators of the Hudson Valley program from March 2022- March 2023. The report provides helpful data and comments that can help guide other regions wishing to replicate this program.	Digital Navigators of the Hudson Valley	2023

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
Fly Like an Eagle: Measuring Transformational Social Outcomes Among Seniors Using Technology	<p>This report focuses on how internet access, device adoption and digital skills training can drive social engagement for low-income seniors. The report was based on "Connected NYCHA", a program providing technology access, devices, and training to 10,000 aging individuals living in New York Housing Authority (NYCHA).</p>	<p>Older Adults Technology Services (OATS), Inc.</p>	<p>2022</p>
Homeless Need Internet Access to Find a Home	<p>In 2019 CBJC, the largest division of the nonprofit affiliate of the New York City Bar Association, conducted a survey of current and past residents of family shelters in Manhattan and the Bronx around internet access and use. Findings and recommendations were presented in this 2020 report.</p>	<p>City Bar Justice Center's (CBJC) Legal Clinic for the Homeless (LCH)</p>	<p>2020</p>
Raising Health Immigrant Health Resource Directory	<p>This resource provides options for potential support in navigating online health insurance for immigrants and people with language barriers.</p>	<p>Raising Health (Academy of Medical and Public Health Services)</p>	<p>2022</p>
Increasing Digital Inclusion for Older	<p>This report describes how a unique</p>	<p>Older Adults Technology</p>	<p>2020</p>

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
Adults in New York’s North Country	partnership between Older Adults Technology Services (OATS) from AARP and the Northern New York Library Network has better connected 200+ aging individuals.	Services (OATS), Inc.	
Investing in Quality: A Blueprint for Adult Literacy Programs and Funders	The Literacy Assistance Center – with support from the NYC Department of Youth and Community Development (DYCD), the primary city funder of community-based adult literacy programs – engaged program leaders and other stakeholders in a process to articulate a shared understanding of what a comprehensive, quality community-based adult literacy program looks like and what it costs to implement. This report – which includes a first-of-its-kind cost model – is the result of that process.	Literacy Assistance Center	2017
No home left offline: accelerating Affordable Connectivity Program adoption	This report provides analysis and recommendations on how to increase ACP enrollment.	Education Superhighway	2022

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
Orleans Digital Literacy Initiative Final Report	In November 2020, Orleans County began an assessment of digital literacy and internet access through the Orleans Digital Literacy Initiative. This report summarizes the findings from that initiative and recommendations for improving digital literacy in the region.	United Way of Orleans County	2021
Southern Tier Digital Equity Regional Needs Assessment	This report provides detailed information about the needs of the eight covered populations addressed by the regional needs assessment of the state's ConnectALL Office, reporting on a variety of engagements with community members from April-July 2023.	Southern Tier Digital Equity Coalition (STDEC)	2023
Westchester County - 2022	This study examines digital access among families in Westchester County, NY using an original survey administered between February 10th and April 15th 2022. Digital access is broadly defined in this study to capture student and family access to electronic devices, internet options, digital	Westchester Children's Association / Pace University	2022

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	<p>literacy, digital communication, and experiences with remote learning. This shows that a majority of respondents were not aware that internet affordability programs existed, people of color face additional barriers in other life areas such as health care due to digital inequity, and that technology is often synonymous with stress for many in the County.</p> <p>Key recommendations include:</p> <ul style="list-style-type: none"> • School districts in Westchester County should provide different digital access resources based on family SES and racial/ethnic background, as digital access needs seem to vary based on the above-mentioned characteristics. Special attention should be given to students and parents of LatinX origin as this group seem to lag behind in terms of access to electronic devices, internet services, and digital literacy skills. 		

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	<ul style="list-style-type: none"> School personnel should emphasize the importance of consistency when communicating with families and provide opportunities for families to communicate with one another online. Communication is critical for social inclusion. 		

8.1.5 Other Resources and Tools Published by Nonprofit or Community-Based Organizations

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
Affordable Connectivity Program (ACP) Dashboard Inputs	This GitHub page provides access to download the datasets used by the ILSR to create and maintain their ACP dashboard.	Institute for Local Self Reliance	2023
Affordable Connectivity Program Dashboard	This dashboard visualizes the data released on Affordable Connectivity Program utilization by the Universal Service Administrative Company.	Institute for Local Self Reliance	2023
Broadband availability across U.S. school districts	The broadband availability across U.S. school districts map illustrates how infrastructure limitations disproportionately impact	Center on Rural Innovation (CORI)	2020

Plan Title	Plan Description and Recommendations	Author Organization(s)	Year
	students in rural communities.		
NYS Digital Equity Portal	The NYS Digital Equity Portal is an interactive, online data and mapping tool for New York State communities seeking to advance digital equity.	NYS Digital Equity Portal	2023
Southern Tier Digital Equity Map	This resource is an interactive map in Tableau showing ACP eligibility and enrollment in the Southern Tier.	Southern Tier Digital Equity Coalition (STDEC)	2023
Southern Tier Digital Equity Maps and Statistics	Compiled by Arden Kirkland in June 2023 for the Southern Tier Digital Equity Coalition (STDEC).	Southern Tier Digital Equity Coalition (STDEC)	2023
The Affordable Connectivity Program Enrollment Performance Tool	This tool was created to help any community answer the question: “How are Affordable Connectivity Program sign-ups going?”	Benton Institute for Broadband & Society	2023
NDIA/Schmidt Futures DE Coalition grants	The New York Digital Inclusion Fund supports the research, design, and formation of new and existing digital inclusion coalitions as well as innovative partnership models that address digital inclusion barriers with solutions across New York State.	Schmidt Futures, National Digital Inclusion Alliance (NDIA)	2022

8.2 Public Comment Record and Response

Below is a record of public comments received through the period of November 6, 2023 to December 6, 2023 and actions taken by the ConnectALL in response.

	Public Comment	Written Responses and Actions Taken by State in Response
1	Regarding the data table on pg.143 Survey Sample. Respondent claimed to work as a regional partner collecting survey responses and recalls receiving over 425 responses for the Capital Region during the survey period. However, this section states there were 181 responses. Concern around the accuracy of the overall percentages presented in the data table.	Comment reviewed and considered; automatic reply sent to commenter. Data revised and corrected.
2	I would like to see school librarians mentioned as teachers of digital literacy. School libraries, in addition to public libraries, need support in updating their websites for accessibility. I am also very sad that the NOVELNY program through the NYS Library does not have a funding source past June 2024. This resource is essential for digital equity. It would be great if a different funding source for this valuable resource could be found.	Comment reviewed and considered; automatic reply sent to commenter. Data revised and corrected.
3	Section 3.2.1.7 on page 68 and in the Appendix Part one pp. 149 ff on rural versus urban classification. According to Appendix I, "The State used the New York State Department of Labor's rural classification system to classify respondents as rural or urban in a consistent manner. NYS DOL classifies the state's sixty-two counties into Metropolitan Statistical Areas (MSA), which are defined as continuous regions anchored by at least one urban core with at least 50,000 residents. The New York-Northern New Jersey-Long Island, NY-NJ-PA Metropolitan Statistical Area also includes two subdivisions: the Nassau-Suffolk Metropolitan Division as well as the Putnam-Rockland-Westchester Labor Market Area. If a respondent's reported home zip code was located within an MSA or the MSA subdivisions defined above, it was considered urban. ¹ If the zip code fell in a county that does not form part of an MSA or the	Comment reviewed and considered; automatic reply sent to commenter. Data revised and updated throughout document using NTIA's statutory definition of urban and rural.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>subdivisions, it was classified as rural. This designation results in 85% of New Yorkers being classified as urban, and 15% as rural. This distribution of survey respondents corresponds closely to 2020 ACS census classifications, which classify 87.4% of the state's population as urban and 12.6% of its population as rural." Somehow, counties surrounding Tompkins County were classified as rural for the SDEP, yet Tompkins County was not. I live in the Town of Caroline, a decidedly rural community (zip code 14817), and we have been trying for years to get broadband service for all residents without success. Our geography is very hilly, and there seems to be no practical way for us to get service to all residents. This has an impact on our ability to do online courses, to have home-based businesses, to work remotely, and to do more mundane things like shop online or use social media to stay connected to friends and family. Streaming services are difficult to use when you don't have broadband! So overall, my comment is that I cannot understand how 85% of NY's zip codes are considered urban, and how that determination can possibly be true given the enormity of the Adirondacks, the North Country, the Finger Lakes, and our many other designated "rural" areas. For sure Tompkins County cannot possibly be considered urban when we only have one college town (Ithaca) as a city of any size at all. I think the planners should take yet another look at their criteria for determining what zip codes are rural, because it seems to me it does not match the reality on the ground.</p>	
4	<p>The defunding of the NOVEL NY platform means that there will be no vetted databases for NY citizens to access. All NYS citizens should have the opportunity to achieve their utmost potential when they: <ul style="list-style-type: none"> • Can access to quality library resources which are diverse, culturally responsive, promote academic and personal learning, provide accurate and timely information, and cultivates the strengths and addresses the needs of each person they serve; and • Where these library resources build an education system that removes </p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Follow up stakeholder meeting held.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>barriers to students' equitable access to learning and promotes lifelong learning; and • Have quality resources to rely on for research on a variety of topics of interest for both academic and personal use; and • Have consistent and ongoing access to these library resources which are fully funded NOVEL NY offers a networked library where librarians apply their expertise in selection to create paths to useful sites, to verify the accuracy and currency of data, and to validate resources. Through its connection at the local library, NOVEL NY also makes these resources available to all students and NYS citizens, even those without personal computers. NOVEL NY has been, and should continue to be, always open, always ready, and always available. Our citizens rely on the resources in the NOVEL NY program to provide them with equitable access to basic research platforms across our state. NOVEL NY resources also allow our students to access to these resources during and after their K-12 schooling via the public library. It is essential to teaching and learning that all students have equal access to sources of research that provide diverse perspectives based on reliable sources. Access to these resources should not be determined by ability of the person to purchase these resources, as that sets up a system where equal access is unattainable. These resources should be freely available to all New York State students and citizens. The potential lack of funding for the NOVEL NY databases will negatively impact the learning of all New York State citizens and students and create an inequity in access to quality research resources, especially those in more rural districts. Action Requested: We urge the ConnectAll Committee to fully fund these resources in a manner that allows all New York students and citizens ongoing, unlimited access to this essential and fundamental resource and incorporate it as part of their implementation plan.</p>	
5	<p>The strength of our democracy relies on having an educated populace. While it is fantastic that internet</p>	<p>Comment reviewed and considered;</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>access has been expanded across the state for citizens to access information online, putting our faith in the algorithms of the tech industry is dangerous. There needs to be a means for NY citizens to pull accurate, timely, and unbiased information from the tsunami of content found through search engines and social media. The databases provided through NOVELNY are essential to this end. Young people in NY State need to know these resources exist and be trained on them in school. Adults in our state need to continue to have access to these resources. Please continue to provide the NOVELNY databases to our state.</p>	<p>automatic reply sent to commenter. Follow up stakeholder meeting held.</p>
6	<p>The defunding of the NOVEL NY platform means that there will be no vetted databases for NY citizens to access. All NYS citizens should have the opportunity to achieve their utmost potential when they: <ul style="list-style-type: none"> • Can access to quality library resources which are diverse, culturally responsive, promote academic and personal learning, provide accurate and timely information, and cultivates the strengths and addresses the needs of each person they serve; and • Where these library resources build an education system that removes barriers to students' equitable access to learning and promotes lifelong learning; and • Have quality resources to rely on for research on a variety of topics of interest for both academic and personal use; and • Have consistent and ongoing access to these library resources which are fully funded NOVEL NY offers a networked library where librarians apply their expertise in selection to create paths to useful sites, to verify the accuracy and currency of data, and to validate resources. Through its connection at the local library, NOVEL NY also makes these resources available to all students and NYS citizens, even those without personal computers. NOVEL NY has been, and should continue to be, always open, always ready, and always available. Our citizens rely on the resources in the NOVEL NY program to provide them with equitable access to basic research platforms across our state. NOVEL NY resources also allow our students to access</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Follow up stakeholder meeting held.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>to these resources during and after their K-12 schooling via the public library. It is essential to teaching and learning that all students have equal access to sources of research that provide diverse perspectives based on reliable sources. Access to these resources should not be determined by ability of the person to purchase these resources, as that sets up a system where equal access is unattainable. These resources should be freely available to all New York State students and citizens. The potential lack of funding for the NOVEL NY databases will negatively impact the learning of all New York State citizens and students and create an inequity in access to quality research resources, especially those in more rural districts. Action Requested: I urge the ConnectAll Committee to fully fund these resources in a manner that allows all New York students and citizens ongoing, unlimited access to this essential and fundamental resource and incorporate it as part of their implementation plan.</p>	
7	<p>I see no provision in this document for improving wireless cell phone and data coverage. In rural areas such as Schoharie County, there are many dead zones in coverage that present safety hazards regarding 911, as well as a general lack of usability for people accessing the internet on their cell phones. Almost everyone has a cell phone and use it for internet access. In many rural areas, internet access from your cell phone is nonexistent. Putting up more towers seems like it would be cost efficient, especially compared to laying of broadband cable. We in rural areas need more cell phone data coverage badly.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
8	<p>This comment is real, and I am also using it to try out the public comment system so I can demonstrate it to others. We have found that Digital Navigators of the Hudson Valley is a program that delivers personalized and effective service to individuals who do not know who to turn to for their everyday tech needs. The program runs effectively when partnered with existing library or social services. That is because it takes</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>advantage of the high status and trustworthiness these workers have with their community already. Running the program is costly between training, staff time, and marketing. Every time a Digital Navigator spends an hour with a client, that is an hour they are not spending on their other duties in their organization. If the implementation of this plan leads to more funding for Digital Navigator programs, we can pay for more individuals to be trained, and for the organizations to cover the additional hours that the navigators spend on this work. We have created a model that is replicable and effective. It needs funding to remain sustainable.</p>	
9	<p>CAO has put a premium on digital literacy training. As a public librarian, I know that while libraries share resources, there is no unified digital literacy training for the state. The New York State Library put out a 2022 Digital Inclusion Kit, which may serve as a good beginning for building a consistent DL program for all public libraries. I think that this needs to be a focus in the early stages, otherwise, we can get the broadband access to the people, but we will have no outlets to teach them with proper training.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
10	<p>Long Island has a great inequality when it comes to library services due to local funding. Wealthy communities have better library facilities than those who are less prosperous. This inequality is not reflected in the report on Long Island. Resources and training are should be allocated to the communities in need. If a library can afford to loan hotspots without funding, then they probably should not be the target for this program</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
11	<p>My comments pertain to ACP outreach and the ACP eligibility / certification process. After having worked as a Digital Navigator for about 1 year, I've noticed that there are some challenges inherent to the ACP process that might be smoothed over if the FCC national verifier could apply to individuals rather than households. If this were the case, the ACP program could benefit more individuals, and help secure affordable coverage for</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>people whose housing situation change. Moreover, it could better help individuals who may qualify for more than one service or discount. Streamlining the process in this manner may assist in ACP outreach, at least for public workers or non-profit workers, as having a national verifier number issued by the FCC would establish quick, confirmed eligibility for potential users when they apply for different discounted services or a device.</p>	
12	<p>As a public school librarian, I can attest to the need that school districts have for equitable access to databases, such as those provided by Novel NY. I work in a school district that has over 70% living below the federal poverty limits. Providing them access to credible information and research tools is critical to their learning. So many of my district's families do not even have reliable internet at home, much less access to subscription databases that can help them with homework, research papers and other school work. One of the key things that I teach students is critical analysis and thinking. Our access to subscription databases via Novel NY is crucial to this goal.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
13	<p>The pronouncement in the Plan's "Privacy & Cybersecurity" Section that residents are primarily concerned about Digital Safety does not include whether such residents utilize Firewall Software and/or Recommended Settings of such Preventive Measure Solution. Also, the reality is that a number of my own interactions with Norton Brand Product Line Firewall Software have been adverse. It would be helpful to know if the general public is utilizing firewall software, and which brand. It would also be helpful to know if pre-loaded firewall software is being utilized, and if any variety or frequency of Technical Issues are resultant.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
14	<p>In the 170 square mile school district there is a wildlife management area named Happy Valley that you just cannot get infrastructure built within. Compare it to a lake or the Adirondack Park. We do not have the towers/infrastructure in place to support the connection. So it doesn't matter that the ACP allows for a credit, if you can't get the internet at all you have no need for the credit. Build the towers, connect the last-mile connections as indicated in bullet one. DSL and satellite are unreliable. Many students went without access in the early days of COVID and remote learning due to no internet access at all much less reliable internet for those that did have a connection. So the problem becomes cost because no infrastructure wants to be built where only a handful will connect to it. You can not give vendors the choice to build or not. It will end up like water districts in this area wherein individual communities' need to organize a group to apply for a grant to design/draw the water district and vote to construct it. Build it for all. This plan continues the same insanity. The broadband was promised under Governor Cuomo back in 2015. We have not seen much progress to the infrastructure in the rural areas. Again, the subsidy for cost doesn't help when you do not have access to the infrastructure. This plan will just keep money flowing to existing vendors and no real progress will result. It's like running electricity, you have to have the power lines installed.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
15	<p>We are Cantata Media, LLC, publishers of 150 Daily Voice news websites covering 83 counties in 7 states, including New York. Our mission is to report on need-to-know local information and up-to-the-minute breaking news. We bridge the "news desert" between national and hyperlocal, covering town, city, county, and state. We applaud your detailed and ambitious efforts to bring universal broadband and digital equity to New York. However, we encourage ConnectALL to consider the role news organizations play in advancing digital literacy, adoption, and broadband access</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>programs. First, newsrooms, and especially digital newsrooms like ours, can play a direct role in helping train residents on the uses of the internet. Each time a reader accesses Daily Voice (and we are online only) they reinforce their own digital literacy, learn how to navigate websites, interact with websites, and learn how to better search the internet. Therefore, ConnectALL should designate newsrooms and organizations that support newsrooms as "trusted community partners" and/or anchor institutions under the Digital Equity or BEAD programs. Second, we encourage the state to use local news organizations to advertise services that are being provided as broadband access and affordability are expanded. Broadband Equity, Access, and Deployment sub-grantees should be required to prioritize advertising in local media to alert residents of new services or programs in their area, such as public broadcast stations, nonprofit newsrooms, local print newspapers, or hyperlocal websites. National research shows local news is the most trusted source for news across all age groups. Daily Voice sites are apolitical, non-partisan, and as fair and complete as possible. Readers know we don't take sides. We do not publish editorials or opinion pieces, nor do we endorse political candidates. Our readers know we report what needs reporting and trust us to do so. State authorities should prioritize advertising plans that include local news placements, thereby leveraging the trust local communities have in their local news outlets. Third, digital equity plans should strengthen local news outlets in order to provide trustworthy information as the state increases broadband access and use in communities. Digital equity aspires to equip residents with the resources, infrastructure, and skills to be full participants in their democracies, economies, and societies, which is impossible to achieve without strong local news. A robust body of research of the last two decades has shown that areas that lack local news have lower voting turnout, less competitive elections, and fewer residents are likely to know the name of their representatives or even google the mayor. But it doesn't stop there. A West</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>Virginia University study of successful West Virginia newsrooms showed "there is an undeniable correlation between a strong local news product and a persevering local business dynamic." One expert even told Rebuild Local News that building out broadband access without also shoring up local news is like providing "high speed access to garbage" because national news, partisan information, or outright falsehoods usually fill the vacuum left by weak or nonexistent local news outlets. As a starting point, ConnectALL could help local news outlets, particularly those in rural areas, upgrade their technology to better serve their communities. The state could, for instance, provide grants to news organizations to upgrade websites. Such a program would not only support digital equity by creating more revenue opportunities for newsrooms via digital advertising, subscriptions, and memberships, but the wider community. It would ensure that local news would be waiting for residents as they access greater broadband services, helping those residents to get the information they need to more fully participate in civic life. Finally, states should consider strengthening the ability of news outlets to provide trustworthy information in under-served areas. Some areas may lack local news entirely, "news deserts," or may no longer have a local news outlet that provides adequate coverage of important local matters. In New York, Daily Voice is one of the few daily news outlets providing breaking news to Putnam, Rockland, and Sullivan Counties. Areas that lack both broadband and adequate local news are "double deserts" (in the parlance of the Rebuild Local News coalition). In double deserts, New York should consider supporting programs that fund news organizations like ours to improve local coverage. This would help improve civic participation. We thank you for your dedication to broadband equity and access, as well as ensuring that all New York residents have the ability to be full digital participants. Thank you for your consideration.</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
16	The measurable objectives are fine, but is it possible to take them further and include an objective for not just increasing New Yorkers' awareness of and access to available programs but actually increasing New Yorkers' digital literacy? This is the ultimate outcome, correct?	Comment reviewed and considered; automatic reply sent to commenter.
17	Hi there, I wanted to offer a comment / suggestion regarding outreach. As a Digital Navigator working out of a library, I often help patrons with various online portals that connect them with health, employment, or social service agencies. Many patrons find the portals to be frustrating, and they struggle to access the information they need. To improve end-user experience, it might be helpful to have these agencies train Digital Navigators to use the sites. I think offering training to Digital Navigators would ensure greater success when working with patrons, and would allow these agencies to have more satisfied users.	Comment reviewed and considered; automatic reply sent to commenter.
18	"Strengthening networks to share resources and take coordinated action," correctly highlight CAO's priority to "strengthen networks" and "build the capacity of community-rooted and trusted digital equity organizations." I extend my thanks to the ConnectALL team for recognizing the importance of this and prioritizing it. A key recommendation for effectively and equitably building capacity is the timely release of funding. Many digital equity organizations across the state, having bootstrapped their work for some time, lack the financial resilience to endure a lengthy reimbursement grant process. It is undesirable for these organizations to rely on third-party financial tools, such as bridge loans or lines of credit, to cover funding gaps while awaiting reimbursements. To genuinely enhance the capacity of these organizations, grants must be designed to avoid reliance on reimbursement-based models. Our experiences with such grants have presented significant challenges. Addressing this issue is crucial and demands immediate attention and action in planning the grant deployment process. I suggest that the CAO establish a stakeholder group of	Comment reviewed and considered; automatic reply sent to commenter.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>practitioners to help inform the grant process. This period is unique and potentially once-in-a-generation, similar to the 1960s when President Johnson's War on Poverty led to initiatives like Head Start and community action agencies. Like those earlier organizations addressing poverty, today's digital equity organizations are at a pivotal juncture. We have a significant opportunity to develop these organizations into community anchors akin to community action agencies in every U.S. community. The grant process for "digital action agencies" should mirror this template. Digital action agencies, deeply rooted in the digital world, represent a different organizational mindset compared to traditional community action agencies. I commend ConnectALL for its focus on building the capacity of digital equity-focused organizations in its plan. As someone widely recognized as a state-wide leader in this field, I wholeheartedly believe that this aspect of the plan will be crucial in ensuring that no New Yorker is left behind from the opportunity to thrive in a digital economy and world.</p>	
19	<p>New York State should prioritize no-cost broadband adoption programs as part of the State's Digital Equity Plan. Other States such as Connecticut have included in their broadband plans support for direct subsidies towards broadband subscriptions that will improve affordability for residents.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
20	<p>We believe Albany County and its Hilltown Townships of Berne, Knox, Rensselaerville and Westerlo should be included as a Covered Population under the Rural Inhabitants Category. The Town of Knox spans 40 square miles and includes approximately 2,600 residents, averaging 25 acres per household. Page 69 - Section 3.2.1.7 Rural Inhabitants is using the NYS Dept of Labor MSA designations to designate a rural population. Using this system of measurement unjustly excludes Albany County's rural townships. Page 76 - 3.2.2 Regional Needs Assessment NYS Regional Snapshots – The Capital Region The snapshot</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	indicates the Capital Region (including Albany County) contains a higher share of the rural residents than other parts of the state. This conflicts with the system of measurement utilized in Section 3.2.1.7 Rural Inhabitants, which disproportionately excludes Albany County and its rural townships.	
21	New York State should prioritize no-cost broadband adoption programs as part of the State's Digital Equity Plan. Other States such as Connecticut have included in their broadband plans support for direct subsidies towards broadband subscriptions that will improve affordability for residents. Programs that target direct broadband subsidies to at-risk populations including low-income housing residents have seen significant progress in closing the broadband adoption gap. For example, Big Apple Connect, a public-private partnership, is providing over 100,000 NYCHA households with uninterrupted high-speed broadband. New York's State Digital Equity Plan does not list no-cost broadband adoption initiatives as one of the planned efforts to close the digital divide. Eligible uses for program funding may also include non-deployment projects to support the adoption of broadband services, including programs that offer low or no-cost broadband service to low-income households.	Comment reviewed and considered; automatic reply sent to commenter.
22	These comments have been compiled as a result of the North Country Public Comment Session hosted on November 14th. Comments were made by multiple stakeholders from the North Country. A definitions section in addition to the acronym section would be helpful to highlight what NYS follows in terms of defining technical terms such as broadband, digital literacy etc.	Comment reviewed and considered; automatic reply sent to commenter. Glossary of relevant terminology added to Chapter 7.
23	Page 30-32. Especially regarding the individuals that have disabilities and are over the age of 60 experiencing issues maintaining and troubleshooting their devices- how will this be rolled out? Will classes be offered for assistance, and if so how will these classes be advertised? Digital literacy- again regarding elderly	Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement for

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>individuals, how will roll out trainings and advertise them. Cybersecurity is important for ALL specified classes of individuals as well as teens and children (they feel invincible with regard to internet). I agree with these objectives and would love to be included on the how and helping (especially the elderly in my area).</p>	<p>people living with disabilities conducted.</p>
<p>24</p>	<p>Congratulations on completing the draft of New York's Digital Equity Plan! As a national nonprofit organization focused on the device ownership aspect of digital equity, we are delighted to see the inclusion of devices as a goal within New York's plan. 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. 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 (including members in New York). We are truly and sincerely vested in your success. First, we would like to emphasize four overarching points: Large screen device ownership: Personal device ownership provides a unique computing experience that cannot be replicated through public use of computers or shared devices. Large screen devices such as laptops, desktops, Chromebooks, and tablets, are critical for a full and equitable computing experience. While smartphones are often more affordable than the upfront cost of a computer, evidence shows the use of smartphones alone may limit the range of one's online activity and depth of overall digital skills. Ecosystem approach: To ensure that all New York residents are able to obtain a free or low cost computer, establishing a robust supply of free and affordable devices through accessible, resilient, community-level distribution systems is critical.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>Systems thinking is required, with active involvement from a diverse range of actors and stakeholders. Digitunity's Methodology for a Sustainable Device Ecosystem (found here) provides a framework for addressing this issue on a large scale. 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 purchasing 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.</p>	
25	<p>Kudos!: The plan's goal to "Increase the number of New York households that have internet-enabled devices at home" is excellent. We also appreciate the focus on device ownership, recycling and refurbishing and supporting the maintenance and repair of computers. Device type clarification: While devices are mentioned throughout New York's plan, there is not a clear goal to prioritize large-screen computers over smartphones. Only using smartphones to interact with the online world is limiting. Clarifying this distinction throughout the plan for large screen device ownership will ensure that the focus remains on providing individuals with the tools necessary for full digital access and participation. Supply is critical: As noted, generating a robust and ongoing supply of technology to</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement for people living with disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>be refurbished is necessary for a sustainable device ecosystem. While supply can be generated through donations from individuals, it is typically corporations, government, and other large institutions that yield the biggest quantity and highest quality of devices that can be refurbished. Efforts such as a statewide campaign for businesses donations would be extremely helpful to your efforts, as well as targeted engagement of organizations with large amounts of technology. Digitunity has deep knowledge regarding the generation of supply, and can be utilized as a resource. Also, for your information, in December 2022, Digitunity spearheaded the effort to pass the federal Computers for Veterans and Students Act which will soon direct repairable federal computers to nonprofit technology refurbishers. New York can be a beneficiary of this program. Workforce opportunity: Refurbishing computers can be a viable workforce development program with a low entry point for staff and a robust career ladder to family sustaining wages. Plus, it may come with its own set of funding sources (such as the Workforce Innovation and Opportunity Act) to support the work on an ongoing basis. Developing a new program or integrating into an existing refurbishing program that is designed to train personnel in technical skills and refurbishment would not only increase the State's capacity, but also create a pipeline of technology talent for future initiatives. Device essentials: Acknowledgement of the unique device supports for people with disabilities is excellent. For all Covered Populations, in addition to a computer, there are Device Essentials that have costs and require planning. Items such as headphones for telehealth and telework, desks for cramped senior apartments to cybersecurity software should be referenced in the plan. Digitunity's Device Essentials graphic here (https://digitunity.org/community-forums/device-essentials/) outlines these components. Support for device deployment: Planning is required for deployment of computers to Covered Populations as it is a complex, multi-step, multifaceted process and we encourage</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>more attention to this in the plan. Specific training and support should be provided to entities that are tasked with providing devices to Covered Populations. 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. While public libraries are often thought of in this role, many libraries played this role during the pandemic (via federal Emergency Connectivity Funds) and found that they were ill-equipped and not interested in further serving as deployment partners in the future. It will be important to ensure that deployment partners are interested, have the capacity, and are supported in this role. Evaluation: We strongly recommend that performance indicators go beyond measuring the number of devices distributed. Establishing connections between and among various actors and stakeholders within an ecosystem, and the performance of the ecosystem itself, should be monitored as well. Connecting supply to deployment: Digitunity has a longstanding online technology donation matching platform that can be utilized to connect 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 your team.</p>	
26	<p>Specifically name ISPs as collaborators in strategy 1 of 5.1.3 digital literacy strategy. There is no reason profit generating entities in our regions should not assist in the provision of digital literacy services. It is 1. a missed opportunity not to piggyback delivery of broadband and literacy services 2. A number of ISPs have abused their positions as sole providers of the internet, and such collaborations could serve as an additional form of much needed accountability. Regional Planning Boards, or planning entities could also be named, as they are both knowledgeable about broadband efforts and have</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	resources and networks that would benefit digital literacy efforts.	
27	The NYS Digital Equity Plan has a lot of information about digital literacy and how we will educate those to use it properly, however digital literacy means nothing without the ability to access it. The plan should recognize ways NYS will try to improve broadband access and not just talk about the programs. What will be prioritized? Why will those be prioritized? As stated in the comments in Chapter 3, if children are only able to access broadband at school or libraries, they are not able to practice their digital literacy skills at home.	Comment reviewed and considered; automatic reply sent to commenter.
28	Overall, I think this plan is a great start, however I truly believe that children should have a higher focus in the plan. What is good for children is good for everyone.	Comment reviewed and considered; automatic reply sent to commenter.
29	Our office has been working heavily on broadband since late 2019/early 2020, and, to my knowledge, we have never known there were Digital Equity Coalition's in existence, let alone in the Southern Tier. It wasn't until the Upstate Rural Broadband Conference in Binghamton when we were made aware of such coalitions. Each coalition should have a website which identifies who the members of the coalition are, the mission, dates, times and locations of all meetings, and what is discussed at the meetings. Looking at the ConnectAll website, out of the 11 Coalition's across the State, four do not have websites at all, and one simply says "Several". https://broadband.ny.gov/system/files/documents/2023/07/regional-digital-equity-contacts.pdf There should be representation on the Digital Equity Coalitions by those who are working to implement broadband projects. How can we as a community help them	Comment reviewed and considered; automatic reply sent to commenter.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>promote digital equity if we don't know what they are doing? Since learning we had a coalition in the Southern Tier, I have since reached out to find out more information about meeting dates, who are the members, etc. NYS should provide funding to these coalitions in order to create initiatives to do more for broadband equity. Groups of individuals without funding for actual initiatives do nothing other than advocate.</p>	
30	<p>New York State should prioritize no-cost broadband adoption programs as part of the State's Digital Equity Plan. Other States such as Connecticut have included in their broadband plans support for direct subsidies towards broadband subscriptions that will improve affordability for residents. Programs that target direct broadband subsidies to at-risk populations including low-income housing residents have seen significant progress in closing the broadband adoption gap. For example, Big Apple Connect, a public-private partnership, is providing over 100,000 NYCHA households with uninterrupted high-speed broadband. New York's State Digital Equity Plan does not list no-cost broadband adoption initiatives as one of the planned efforts to close the digital divide. The plan should explicitly support no-cost broadband adoption programs that directly address known barriers to adoption.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
31	<p>Chapter 3.1 The current Asset Inventory can be viewed here or click at this address: https://bit.ly/NYS-DE-Asset-Inventory On the Asset Inventory Table link, please change the following: 10 libraries to 21 member libraries, and Nioga Mobile Tech serves Niagara, Orleans, and Genesee Counties in the Western New York. We are not in the Finger Lakes area, please take that out of the "Regions" column. Thank you!</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Asset Inventory updated.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
32	<p>Many residents of the Town of Ischua have been bypassed by Cable due to ours being a rural community. The main NY State roads have been serviced by Spectrum, skipping many of our rural roads where many of our economically challenged families reside, many of these families have school aged children. Attempts to contact Spectrum have been met with no results, and we hope that the ConnectAll Initiative will finally bring High Speed connections to our small town.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
33	<p>Frontier refuses to run the last half mile of fiber up the road. There are 10 houses that could benefit from Broadband, but we were left out of the original grant.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
34	<p>In section 3.2.2 Regional Needs Assessment, there is an overview of gaps, but there is no overview of the needs by region that each of the Coalitions identified. I'd like to see a table of ALL of the needs that were identified by our Coalitions, not just those that the CAO was able to place within the context of the measurable objectives NTIA has asked to see in its Plan. In the Regional Snapshot for the Finger Lakes, there are two typos. Batavi should be Batavia Dansvill should be Dansville</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
35	<p>The Plan does not have SMART goals and these need to be developed at some point in time, hopefully not before the Plan gets approved by NTIA. Coalitions and others should be funded to assist with their development. How programs are implemented matters. There is a great deal of talk in the Plan about collaborative approaches to the design and implementation of digital equity programs. As a result, there needs to be an Implementation Process/ Measurable Objective that talks about and measures collaboration by various actors, such as the DE Task Force, Coalitions, NYDEN, etc.. ChatGPT identifies the following coordination metrics that are commonly used. "Here are some common ways to measure</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Measurable objectives developed.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>project coordination: Timeliness: Measure the adherence to deadlines, milestones, and timelines. Evaluate if tasks are being completed within the planned time frames. Communication Effectiveness: Monitor communication frequency, channels used, and clarity of messages. High coordination often correlates with clear, consistent, and timely communication among team members. Task Dependencies: Track how well different tasks and team members are synchronized. Are dependencies identified and managed effectively to prevent bottlenecks? Resource Allocation: Assess how resources (time, budget, personnel) are distributed across different aspects of the project. Coordination involves optimizing resource allocation for maximum efficiency. Issue Resolution: Measure the speed and effectiveness of resolving conflicts, problems, or bottlenecks within the project. Quick and efficient resolution indicates good coordination. Stakeholder Satisfaction: Gather feedback from stakeholders to understand their perception of coordination within the project. Higher satisfaction often reflects better coordination. Quality of Deliverables: Assess the quality of work produced. Strong coordination tends to result in high-quality deliverables due to effective collaboration and oversight. Change Management: Evaluate how changes to the project scope or requirements are managed. Efficient coordination involves adapting to changes while minimizing disruptions. Team Collaboration: Measure the level of collaboration among team members, including cross-functional cooperation and sharing of information and resources. Risk Management: Assess how risks are identified, evaluated, and mitigated throughout the project. Strong coordination involves proactive risk management. Using a combination of these metrics tailored to the specific needs of your project can provide a comprehensive understanding of the level of coordination and areas that might need improvement."</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
36	<p>Residents in low-income areas deserve access to uninterrupted high-speed broadband. The implementation of broadband in these areas would significantly address disparities in affordability and increase digital literacy. Broadband adoption programs are proven to positively impact historically underserved communities and dedicated funds from ConnectAll will address the digital divide barrier many residents continue to face. Specifically, I respectfully request ConnectAll to consider allocating funding for a high-speed broadband adoption program within the Town of Babylon for low-income housing units located in areas such as Copiague and Wyandanch within the Fourth Senatorial District.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
37	<p>This might be relevant to chapter 3 as well-- Young people and children need more specific representation in this plan. Rural communities experience population and talent loss due to young people leaving their communities in search of more opportunities in less rural areas of New York State. In Thomas DiNapoli's report, Rural New York: Challenges and Opportunities, he outlines that in the last 10 years population in New York State has increased by 4.2 percent, however in rural counties population is shrinking. The worst being in Delaware County, whose population shrunk by 7.1 percent in the same amount of time. Increasing broadband availability and access could reverse these numbers, encouraging young people to stay and even relocate to our rural communities. Tangentially, is there a way to reach young people prior to graduation and better match them to a local job within their area of study. Broadband availability and access will strengthen our ability to figure out what jobs young people want in order to make a plan for how our individual communities can grow.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
38	<p>5 outcome areas listed in 1.1 (p.10): Make sure there is a balance of focus, not just on the interests of corporate stakeholders. Section 1.2 (p.12): Need more detail about HOW you will "center the experience and expertise of covered populations." Section 1.4 (p.14): Overwhelming majority of survey responses were completed online failing to capture adequately the voices of those who do not have access or skills to respond online. Take care not to believe you have a fully representative sample from which to draw conclusions. Section 1.5 (p.15): Critical 6th objective is missing -- on-going support for all of the above. Throwing one-time funds and efforts at this issue does NOT sustainably solve the digital divide.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
39	<p>Section 2.1 (p.18): Be sure to facilitate ways for smaller organizations without the capacity for grant-writing to receive assistance as well. Section 2.2 (p.19): Some New Yorkers choose NOT to be online for their own good reasons. Their choices also need to be respected, with services still provided in traditional non-digital ways or better -- provide for trusted "Digital Navigators" to assist them or even do tasks for them when they need online services. Section 2.3.2 (p.21): Instead of SHIFTING digital inclusion efforts, SUPPLEMENT digital inclusion efforts. Section 2.3.3 (p.22): Provide financial incentives to recruit peers for the peer-led training. Section 2.3.5 (p.24): "Plain language" is for everyone, not just those with accessibility issues. Section 2.4.1 (p.26): Participatory budgeting would be more inclusive! Section 2.4.1 (p.26): Public libraries need MORE funding not less if they are to be able to support these initiatives. Section 2.4.1 (p.26): Please keep in mind that not all regional coalitions are at the same stage of development; it's been a major struggle to meet the State's aggressive timeline before we even have by-laws or basic infrastructure. Section 2.4.4 (p.28): Be sure to share data with regional coalition partners. Section 2 (p.17-32): Address the findings in our needs assessment that many community members</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>in the Southern Tier would like to see broadband treated as a public utility so that there is better accountability of internet service providers.</p>	
40	<p>Section 3.1.1.2 (p.37 etc): Libraries need MORE funding to play our critical role in democratizing digital equity. Please be sure to mention this to legislators. Section 3 - in general: We need to reach out to people we missed in the survey and find ways to share information and get feedback that has fewer barriers. The whole structure of this document and feedback mechanism is overwhelming even for an educated, internet-savvy person who has been involved in the process -- you are not likely to get any feedback from those most in need -- the barriers are just too much. Also, please keep in mind folks who choose NOT to access the internet and who could use a trusted navigator to help them when they must interact with the internet to get things done that they need to do. Finally, for this section, averages, like "average income" for a region, can be very misleading. There can be a few (like College Presidents, for example) who make really high incomes dragging up the average living in the same community/region as folks who live hand-to-mouth even with Social Services. Just because there are some wealthy people in an area does not mean the area is wealthy overall.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
41	<p>Section 4.2.4 (p.117): We'd like to know more about the "Community Anchors." Section 4.2.5. (p.117) How will we navigate the conflict regarding leadership of the Haudenosaunee folks? A lot of them do not recognize Clifford Halftown, so we need to reach out in other ways than through official channels.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
42	<p>Section 5.1.1.D. (p.128) Not enough -- even when people are aware of the programs, the cost is sometimes still too high. Section 5.1.4.A. (p.136). Government agencies need to work harder at earning and deserving trust of their websites, not just telling people that they are "safe." Section 5.1.5.A (p.137) "Universal accessibility standards" must make clear the differences between accessibility, usability, and inclusivity, and that there is a need for all 3 in the design of public resources such as government websites. Section 5.1.5.B. (p.138). Make the sites actually more trustworthy.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
43	<p>In the implementation efforts and grant deployments for capacity building in Digital Equity-focused organizations, consideration and focus need to be given to funding not only the support of building programmatic capacity but also funding the tracking and execution of metrics and data. Many digital equity-focused organizations will need to dedicate time and staff to measuring and tracking outcomes data. This function is distinctly different from the role of program deployment. The importance of funding and prioritizing data tracking and metrics cannot be overstated.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
44	<p>P. 12 "The digital divide disproportionately affects rural areas in New York State." I recommend adding these statistics: Access to reliable broadband is more of a problem for rural areas than urban areas: 82% of rural areas in the United States have fixed terrestrial 25/3 Mbps service compared to 98.8% of urban areas. Citation: Federal Communications Commission. 2021. Fourteenth broadband deployment report. P. 20. P. 13 State with approximately 20 million people P. 14 CAO's Digital Equity Survey had more than 5,700 responses. I recommend that you include that a 0.000285% response is not statistically significant and conclusions from that survey may not have reliability and validity.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
45	<p>P. 48 "Nearly 1 million New York households - 13% of all households - lack access of broadband internet of any type." I recommend you add the number and percentage of this which is rural households. Also, note on this page you are referencing the New York Internet Access Survey (2023) which lacks reliability and validity.</p> <p>P. 69 Thank you for including: "Rural inhabitants must turn to less reliable, slower connections like legacy satellite and DSL services." This is a very true statement and why a priority must be given to the installation of fiber in rural areas of the State.</p> <p>P. 90 I will refer to the statistics on this page in Stakeholder Engagement.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
46	<p>Source: Appendices 1.3.11 Regional Focus Groups p. 123 It shows Capital Region Digital Equity Coalition, June 15, 2023, In-Person, Southern Tier, 8 participants. Was this focus group held with the Capital Region or the Southern Tier? Was a focus group regarding the needs of rural residents held in the Southern Tier? The Southern Tier Regional Snapshot shows a desire for more internet service provider options and recommends public housing residents should have free internet. There is no mention of rural needs even though the Southern Tier Region is 85% rural. This is a flaw. The true picture of the Southern Tier Region is not being shown. This is a quote from the Southern Tier Listening Session by New York State ConnectAll, April 24, 2023: "During the high-level discussions on digital equity at the beginning and end of the listening session, participants stressed the need for increased access, options, and affordability of broadband service in the region. Residents also noted that, while there needs to be support for digital literacy training and device support, it is hard to focus on these additive resources or to improve digital skills when many struggle to receive basic connectivity." Putting ancillary goals like funding digital literacy, devices, privacy and cybersecurity, and accessibility of public resources, before achieving universal access and affordability is like putting the cart before the horse. BEAD funding and New York State</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	funding must be primarily used for building out fiber to unserved and underserved locations, particularly in rural areas of the State.	
47	<p>1. Residents who are immigrants are not always situated within low-income neighborhoods, so identifying infrastructure and internet gaps might not be inclusive of this population. 2. Shift focus to public internet hotspots as well since immigrants do not qualify for ACP. 3. Residents have trouble trusting the security and safety of internet access and often have trouble interpreting the information they receive. CBO's ask that they receive a more significant role in providing help to this demographic. 4. Digital literacy and technical assistance programs should be customizable and be overseen in some capacity by CBO's given that they have close relationships with residents/participants(as well as historical background in providing this service) and can gauge whether needs are being met. 5. Additional native languages should be added for accessibility amongst immigrant populations. 6. Application assistance for programs will be needed, CBO's are interested in facilitating this as they currently do so within their programs. 7. CBO's believe having accessible and prompt IT support is key 8. IT support should be readily available in a multitude of languages and native tongues. 9. Streamline the process and timeline for replacing/upgrading devices. 10. Clearly identify how we plan on determining high performing Digital Literacy providers. 11. There should be a public facing forum that gives access to digital programs.</p>	Comment reviewed and considered; automatic reply sent to commenter.
48	3.2.1.7 pg 69 The definition of rural in this section uses NYS DOL MSA data that does not accurately characterize the rural characteristics of Orleans County and the challenges associated with rural areas.	Comment reviewed and considered; automatic reply sent to commenter. Data revised and updated throughout

	Public Comment	Written Responses and Actions Taken by State in Response
		document using NTIA's statutory definition of urban and rural.
49	<p>The New York State Library is grateful for the opportunity to provide comments on the draft State Digital Equity Plan (SDEP). We are especially pleased to see ConnectALL's commitment to invest in libraries, and firmly believe that supporting our libraries through available state and federal funds will be one of the best ways to ensure that our state's digital equity goals are met. Summary of Library Assets and Considerations New York State is fortunate to have a strong public library structure that is supported on a state level. Additionally, standards and mechanisms exist to assist libraries in efforts around community engagement and outreach to the covered populations identified in the SDEP. New York has 757 public libraries offering programming and meeting spaces, internet and technology services (including laptops and wi-fi devices for home use), and community partnerships with municipal agencies, nonprofits, and more. Studies consistently show that libraries are among the most trusted institutions in their communities, which positions them well for this work. We recommend working directly with library systems and individual libraries in these efforts, as streamlined structures for distributing funding already exist. The American Rescue Plan Act (ARPA) funding provided to New York State libraries by the Institute of Museum and Library Services is a recent example of efficient and timely distribution of federal funds. With only an 18-month turnaround, \$5.5 million dollars of funding for digital equity programs and electronic materials was funneled through the regional library councils to individual libraries and systems across the state. Resulting programs included new or expanded digital navigator programs and comprehensive digital literacy training for seniors,</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Followup meetings with stakeholder held.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>among many others. Using SDEP funding to build upon these exciting projects would be a natural next step and help these resources go even further. Essential library considerations relate to access and sustainability. It is critical that funding be committed to both community connectivity and library services and staff to ensure high quality, long-term assistance focused on digital equity. Affordability has been shown to be the greatest obstacle to access, so it is imperative that we balance this among our middle- and last-mile initiatives and prepare contingencies and next steps related to ACP. It is similarly crucial that libraries have dedicated funding for digital equity efforts. Libraries have been providing many of these services for decades, but as this has rarely been structurally supported it has led to staff burnout and inconsistent offerings for communities. Section 2.4.1 Theory of Change, Strategies and Sample Activities We are excited to see a direct commitment to invest in New York State's public libraries as a part of ConnectALL's strategy to ground investments in an asset-based approach. The Plan describes several methods to execute this strategy, including investment in "physical and digital accessibility across New York's public library system." This asset-based approach is revisited again in Section 5.1 (Implementation Strategy and Key Activities) but the investment in public libraries that ConnectALL ties to this strategy in Section 2.4.1 is missing from Section 5.1 and subsequent sections in the Implementation chapter. We believe libraries can play a significant role in implementation, as described further below, and strongly encourage financial support of libraries as part of the Plan's asset-based approach to funding.</p>	
50	<p>Section 3.1 Asset Inventory We are pleased to see so many libraries and library systems in the asset inventory, but we noticed that it is not a complete list of all 757 public libraries in the state, every one of which offers some level of digital skills training and/or access to devices and free, reliable internet service. We encourage ConnectALL to continuously update the</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Followup meetings with stakeholder held.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	asset inventory and reach out to community partners such as the New York State Library to ensure a complete listing of organizations statewide.	
51	<p>The Affordable Connectivity Plan (ACP) The Affordable Connectivity Plan (ACP) is included as part of the strategy for implementing the SDEP. The New York State Library shares the greater digital equity community's concern about the Plan's reliance on ACP, given the uncertainty of the ACP's future and the challenges that low-income individuals have experienced with the program so far. In addition, many people still do not know their household is ACP eligible or even that the ACP exists. If ACP will be included as a key part of SDEP implementation, the Plan needs to provide strategies for communities seeking to spread the word about the ACP, including funding trusted local organizations such as libraries who are doing the time-consuming work of enrolling community members.</p> <p>Section 5 Implementation The New York State Library applauds ConnectALL's decision to work with libraries, nonprofits, and other existing digital equity practitioners to expand and amplify the work that is already being done. Many libraries that have expertise and experience in this space are at capacity in terms of funding, staffing, and resources. These libraries have already done the critical work of establishing trust within their communities. Covered populations in particular may have past negative experiences or distrust of ISPs or government funded programs. It is crucial to invest in community organizations that already have relationships with these groups. There are many ways libraries can support the activities listed in Section 5: Implementation. Almost all of these are services that libraries already provide to some degree, although investments in funding would allow them to expand and build on the programs they have already developed. Some examples of specific services and programs</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Followup meetings with stakeholder held.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>libraries provide that fit under the Key Activities outlined in Section 5.1 include, but are certainly not limited to: Outreach: Distribute surveys and educational materials, either physically in library spaces or on library websites; work with community partners such as housing authorities and other groups to expand wi-fi availability and outreach services. Digital Equity Training: Offer educational programming for staff and community members; provide spaces and assistance for online meetings and telehealth appointments.; provide support and training for digital navigator programs. Internet-Enabled Devices: Loan and distribute laptops and wi-fi boxes; work with the New York State Talking Book and Braille Library and Andrew Heiskell Braille and Talking Book Library to identify and distribute assistive devices and services. Conclusion The New York State Library is proud to have been a part of the development of the SDEP, and we look forward to continuing this important work with ConnectALL. We believe that providing libraries with funding to expand and build on the important work they do in their communities is a crucial step in achieving digital equity in New York State.</p>	
52	<p>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</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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 the draft New York State Digital Equity Plan and shared a summary of it with our readers (https://www.benton.org/blog/new-york-state-digital-equity). 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 New York evaluate both the draft New York State Digital Equity Plan and the ConnectALL Office's revision of the plan. To that end, we also offer A Checklist for Evaluating Digital Equity Visions (see 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 New York's vision for digital equity.</p>	
53	<p>Dear ConnectALL: The Long Island Association supports the prioritization of no-cost broadband adoption programs as part of the State's Digital Equity Plan. Broadband, and its accessibility and availability, is a critical component of our region's infrastructure. It will spur new economic growth and help unlock the potential of underserved communities, so they can more fully</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>participate in our economy. We urge following the model of other states, like Connecticut, which have included support for direct subsidies towards broadband subscriptions in their plans. This will make broadband more affordable for residents, which will help address our high cost of living on Long Island. Additionally, programs that direct broadband subsidies to at-risk populations, including low-income housing residents, have realized significant progress in closing the broadband adoption gap. The LIA also recommends that New York State's Digital Equity Plan includes no-cost broadband adoption initiatives as one of the planned efforts to close the digital divide, because it will directly address barriers to broadband adoption. Eligible uses for program funding may also include non-deployment projects to support the adoption of broadband services, including programs that offer low or no-cost broadband service to low-income households. Thank you for your consideration of this feedback, which will achieve New York State's goals of closing the digital divide, making it easier for people to live, work, and learn.</p>	
54	<p>Although extremely thorough and detailed when laying out broad access and affordability needs and identifying measures to address those needs, the plan does neglect one important thing: consumer information, education, and advocacy. With BPL's Home Internet Access Program, we have discovered many people who do not understand the internet service options available to them. A big part of what our navigators do is help patrons understand the difference between fixed home service and cell service and the advantages of each. We teach them about service bundles and how to unbundle them, about low-income plans you can get with the ACP, and about different internet speeds and what they are likely to need in their household. A surprising number of low-income residents, we have found, overpay for internet service! We help them lower their bills in addition to connecting them to ACP subsidies. We also help them dispute charges when</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>mistakes happen by the ISP. For instance, people with the ACP who are charged a connection fee. This happens more often than it should. ISP customer service reps also often provide incorrect information about the ACP and what ACP recipients are guaranteed in terms of plans and services. Can NYS develop a broadband consumer education tool to help consumers (and the CBOs who help them) better understand their existing options when it comes to internet service? How much are the service plans where they live by speed? What different types of service are there (hotspot plans vs fios vs cable vs cell service) and what are the advantages and disadvantages of each. I believe this belongs in the broadband implementation plan as well as the digital literacy plan. It addresses affordability and accessibility via direct consumer education.</p>	
55	<p>REGIONAL SNAPSHOTS: These comments focus on Long Island, but have statewide relevance. BROADBAND ACCESS METRIC: Please revise the Long Island snapshot to more accurately reflect the high level of need on Long Island. The regional snapshots create the impression that Long Island compares favorably to other regions in terms of broadband access since it has the highest percentage of households with access. However, due to the population size on Long Island, the LI region actually has the state's third highest number of households without access. This is reflected in the table below. In terms of the relative regional need, it is one of the highest need areas, not lowest need. We ask that the Regional snapshots be revised to reflect this high level of need in our community -- that nearly 90,000 people on Long Island lack broadband access. Region Households % with access # with access # without access (1) NYC 3,260,000 0.860 2,803,600 456,400 (2) Western NY 594,100 0.850 504,985 89,115 (3) LI 959,100 0.910 872,781 86,319 Finger Lakes 499,000 0.870 434,130 64,870 Capital 451,900 0.870 393,153 58,747 Mid-Hudson 481,400 0.880 423,632</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>57,768 Central 310,700 0.850 264,095 46,605 Southern Tier 262,900 0.850 223,465 39,435 West Chester 364,400 0.900 327,960 36,440 Mohawk 190,500 0.840 160,020 30,480 North Country 165,300 0.850 140,505 24,795 Total 990,974</p> <p>POVERTY METRIC: Please revise the snapshot to more accurately reflect the presence of poverty on Long Island, particularly as poverty relates to cost of living. The Long Island regional snapshot provides ACS data indicating that 10% of Long Island's households are considered "low income", versus 20% for all of New York State. The snapshot also indicates that the median household income of \$118,700 is the highest in the state. This region-level data understates the severity of economic and broadband access needs that persist on Long Island. Because the Digital Equity Plan will be used to justify future funding requests for broadband equity initiatives, we ask that the CAO revise the snapshot and other elements of the Plan to acknowledge that Long Island's regional demographics mask many subregional economic disparities that impact Covered Populations. We recommend adjusting the snapshot to acknowledge Long Island's high cost of living and structural poverty. As reported in Newsday (December 22, 2022): "About 20% of Long Island households are structurally poor, but many earn too much to be counted below the federal government's poverty line, according to a new report by the Suffolk County Legislature's Welfare to Work Commission. That makes them ineligible for assistance such as food stamps and child care subsidies. The federal poverty level in New York and most of the U.S. is \$27,750 for a family of four, despite cost of living differences. Utilizing the federal metric, only 6% of Long Islanders are poor – about half the national average. But the Commission's 120-page report, "Still Struggling in Suburbia: The Unmet Challenges of Poverty in Suffolk County," found the true definition of poverty on Long Island – based on the actual cost of housing, food, transportation and basic necessities – should be \$55,500 for a family of four.</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>That formula, experts said, means that about one in five Nassau and Suffolk residents are poor." The Long Island Community Foundation states, "Often perceived as an affluent region, the poverty here is a complex, nuanced issue affecting more of our neighbors than meets the eye. There are additional households on Long Island with incomes above the national poverty level that fall below the budget calculated to account for basic needs here." (https://licf.org/about/understanding-long-island/) References: https://www.scnylegislature.us/DocumentCenter/View/87572/122022-Still-Struggling-in-Suburbia-The-Unmet-Challenges-of-Poverty-in-Suffolk-County-PDF https://www.newsday.com/long-island/suffolk/poverty-report-lxf4dudt At the 11/20/23 Digital Equity Coalition public feedback session, the CAO asked for suggested metrics that it could use to supplement the poverty level metrics currently featured in the regional snapshots. Please refer to the report, New Yorkers in Need: A Look at Poverty Trends in New York State for the Last Decade (December 2022), prepared by the Office of Budget Policy and Analysis at: https://www.osc.ny.gov/reports/new-yorkers-need-look-poverty-trends-new-york-state-last-decade#footnote-010-backlink This report references several alternative measures, and we suggest that the CAO consider using the Asset-Limited, Income Constrained, Employed (ALICE) measure by United Way: https://www.unitedforalice.org/state-reports-mobile.</p>	
56	<p>As you are certainly aware, among the most pressing matters of equity confronting our state and nation at-large remains the ever-widening digital divide. According to the 2020 United States Census, more than one million New York households are without at-home, cellular, or satellite broadband subscriptions. Despite the on-paper availability of such services, actual adoption has lagged drastically behind the deployment of broadband infrastructure primarily due to cost. Without deliberate action to close it, the adoption gap will persist as a significant hurdle in our struggle to</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>ensure no American is excluded from the digital age. Across New York State and within New York City, our constituents continue to rely on initiatives that reduce barriers to adoption and deliver sustained connectivity for their neighbors in need – and these measures are certainly necessary. From access to education and healthcare, to the availability of job opportunities and government services, the benefit of reliable broadband in our modern nation cannot be denied. We have a responsibility to instill the importance of digital readiness within every New Yorker and encourage families to secure an affordable broadband subscription that best fits their home. I urge our partners in Albany and the ConnectAll Office to seize the historic resources of the Infrastructure Investment and Jobs Act's BEAD program and include meaningful broadband adoption programs in New York State's Digital Equity Plan. No-cost adoption programs, such as Big Apple Connect, are vital, proven tools to provide low-income households with the ability to secure broadband connectivity for their homes. If we hope to truly bridge the digital divide, we must first accept that mass-deployment is but one front of this battle. To prevent the neglect that historically underserved and overlooked communities have known for decades from bleeding into tomorrow, it's imperative that the Digital Equity Plan includes explicit language to facilitate broadband adoption in every corner of our great state. As we continue our advocacy and action in this shared pursuit of total digital equity, please do not hesitate to lean on my office as a stalwart ally in this space.</p>	
57	<p>The last time the State rolled out a plan for internet connectivity in the Town of Ward , no one in the Town government was consulted . As a result , our Town Hall and our Town Justice were not connected . The service was stopped 2 poles from our Town Hall . The Town Hall has little or no cell phone service . The Town Judge is required to do many hours of online training . He is forced to go to the nearby University to complete this</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>requirement . I would say this was an instance of top down management that failed . I find that top down management strategies have a high degree of failure . We would strongly urge the State not to repeat this error for future rollouts . It is difficult , to say the least , to serve a constituency when you don't know what they need .</p>	
58	<p>Our comments are related to the breakout session takeaways as presented in the New York State's Digital Equity Plan presentation on November 29 2023. In the breakout sessions recap slides (slides 23-43) there were some items we want to re-emphasize or challenge. Group 1: Deep Dive on Broadband Affordability & Availability - Key activity: "Invest in high-quality internet infrastructure in low-income areas, including in housing where service is slow, unreliable, or not available." We agree with this takeaway and want to emphasize that community owned broadband or a government option for broadband is the best way to achieve reliable, high speed internet options. We do not think this key activity should be achieved by subsidizing corporate Internet Service Providers like Verizon, Altice, or Specturm. Our Mayor Eric Adams has done the wrong approach to this with Big Apple Connect, doubling down on the Verizon monopoly with a short term affordable contract for contract, that will likely leave residents more surveilled and trapped in a contract as it gets more expensive when subsidies end. - Key Activity: "Invest public funding and facilitate private investment to create a robust and competitive internet marketplace in New York via CAO's Affordable Housing Connectivity and Municipal Infrastructure Programs, as described in the BEAD 5-Year Action Plan." We hope that public funding can be invested in PUBLIC options rather than private subsidies for internet to big, corporate internet service providers. Verizon, Altice, and Spectrum do not need more money. We need more public and community based options for broadband. - Key activity: "Identify ways that public, nonprofit, ISP, and other private resources can better complement ACP subsidies</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>to make internet more affordable for low-income households." We are very worried about the sunseting of ACP leaving residents trapped in expensive internet contracts. We agree that resources are needed to compliment ACP, but those should be given to public and community based options (ex: Mesh NYC is a community based option that is struggling to compete with corporate ISPs because they are not able to benefit from ACP without a ton of work and overhead and change to their organizational structure). Group 4: Deep Dive on Privacy & Cybersecutity - Key Activity: "Explore methods of shifting the burden of protection away from individuals and toward communities, as well as online platforms and content providers." We wholeheartedly agree with this key activity. Currently, those who are most surveillance, most harassed online, and and most likely to be harmed by online harms are expected to hold the burden of keeping themselves safe. We hope that the burden of protection can be shared so that those who are most vulnerable aren't also asked to do the most work to protect themselves. One day to do this is to not allow internet service providers to collect data for advertising or sell data (especially they should not be allowed to share data to data brokers). Everyone deserves safety and privacy as a default. Currently the default is that big corporate internet service providers are allowed to collect tons of information on their internet users that goes beyond strictly necessary for service provision. Our data is then sold without our knowledge or consent, making corporate internet service providers more money and making us more vulnerable. Thank you so much for this opportunity to comment. Please feel free to reach out to me at aki@raceanddigitaljustice.org if you have further questions.</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
59	<p>I wasn't there for any of the other sessions, but I simply can not get over the irony of having internet-based feedback meetings on a plan that is supposed to help close gaps and improve digital equity across the state. There are a lot of good things in this plan, but I think it's going to fail to maximize results for the simple fact that you're asking computer-literate individuals with internet skills to create a plan for people without and those plans always fail to deliver. You need to do more in-person outreach in disadvantaged communities. Otherwise you're completely missing the point.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
60	<p>As a small startup company seeing how much providing internet service to low income communities during the pandemic helped make a difference it's exciting to think of how much of an impact the focused effort underway from the Connect All Office will bring to the people who need it the most. Real positive substantial long lasting change</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
61	<p>1. Please be clear about what proportion of survey responses were collected online versus on paper. Online survey responses will overstate the prevalence of digital skills in the population.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
62	<p>5.1.2 Accessible Device & Device Support Strategy Comment: It is good to encourage device recycling. However, it is important to emphasize the lifetime of digital devices and making them serve people stably, and that there is a system for refurbishing and repairing computers. Also, the goal needs to be clarified as to whether the aim is to have device ownership in every household, or that everybody within every household has ownership of an appropriate device. Device type is important; a cell phone has different capacities than a desktop computer. 5.1.3 Digital Literacy Strategy Comment: Outside of Northstar Digital Literacy there is no agreement of digital skills standards. It is important that standardization of evaluative methods do not undercut current evaluative standards, especially Northstar Digital Literacy. NYSDOL has been given</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>access to Northstar materials, but even organizations like NYSDOL may require training for its staff in digital skills in order for them to effectively conduct training for others. 5.1.5 Comment: For the identified need "Covered populations frequently cited inconsistent accessibility standards as a primary frustration in engaging with government resources online." Strategy #1 is missing. Strategy #3 This work is assigned to the DETF. This work should be done in partnership with NYS DEN and DEC</p>	
63	<p>Inexplicably, the page numbers seem to have changed since last week. "Digital Divide" should be defined in this section, and I don't see it anywhere. NYS Librarian referred to an alternative phrase last year at a Finger Lakes Digital Inclusion Coalition meeting: "digital fluency" (as I recall) with the word "resiliency" also coming up. "Fluency" as a term is more fitting to the spectrum of haves-and-have-nots when it comes to digital equity, rather than "divide," which feels binary.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
64	<p>In 2.3.2, which is now page 21, there's a recommendation to "Shift digital inclusion efforts." Rather than replace public wifi availability or place-based internet, efforts toward household internet and device ownership should complement & supplement place-based wifi and device lending. The word "shifts" implies that the first model will be replaced by the second, but really, all of those programs need to be simultaneously supported and available. Under 2.3.3, pages 21-22, for Health, the planned activities are ambitious, to say the least. Please consider explicitly noting the existing tax-supported endeavors that would serve these goals, like MedLine Plus and PubMed resources and other programs developed by NNLM/NIH/NLM health information professionals who are already tasked with outreach. In 2.3.5, pages 23-34, Delivery of Government Services, it is crucial that people be given a choice and not be mandated to access government services online. Why force an elderly rural resident, who's never used a device or have</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>an online presence of any kind, to get online in order to access government services? Plan for a non-digital, paper-based alternative as part of truly equitable solutions. In 2.4.2, page 31, for "Increase covered populations' access to digital literacy programming aligned to their specific needs and interests" it's a bit shocking that public libraries are not specifically highlighted here. Every area with a public library has the equivalent of a digital literacy program; in the age of Google, that is the main job of a reference librarian.</p>	
65	<p>Introduction: The New York State Library, in partnership with the New York State Digital Equity Task Force, hosted two listening sessions in November 2023 to solicit feedback and share information about the draft State Digital Equity Plan (SDEP). Almost 200 people attended the sessions, representing librarians, digital equity practitioners, educators, and members of the general public. The comments that follow are the product of those listening sessions. Affordable Connectivity Program (ACP): Multiple participants expressed concerns about the federal Affordable Connectivity Program (ACP) and the role that it will play in the implementation of the SDEP. Participants felt that relying on ACP would be inadequate for addressing the problem of internet affordability and urged the ConnectALL Office to integrate other strategies for addressing affordability. There was concern about the SDEP's reliance on ACP to address the affordability problem given the uncertainty of the ACP's future and the challenges that low-income individuals have experienced with the program so far. Participants noted that the ACP is seen as a subsidy and may not effectively increase access but rather benefit only existing subscribers and ISPs. Furthermore, there were concerns about the difficulty of enrolling in ACP and people getting enrolled in ACP plans that they cannot afford. Several participants noted that many people still do not know their household is ACP eligible or even that the ACP exists. If the ACP will be included as a key part of SDEP implementation, the Plan should provide</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Followup meetings with stakeholder held.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>strategies for communities seeking to spread the word about the ACP, including funding trusted local organizations who are doing the time-consuming work of enrolling community members. Increasing ACP enrollment requires significant funding to community anchor organizations and community to conduct intensive outreach and education. Competition/Transparency: Participants expressed concerns about the lack of competition in the broadband market and called for increased transparency from ISPs. Multiple areas in New York State are currently served by only one internet provider and questions were raised about how the Plan will ensure competition amongst ISPs. Participants advocated for driving competition in the ISP market by ensuring that infrastructure funds support multiple technologies, redundancy, and small, independent ISPs. As one commenter said, it does no good to build new connections if residents are then at the mercy of an ISP monopoly and unable to afford service. There were additional concerns raised about competition among organizations and companies offering computer refurbishment services. There is already a huge demand being placed upon computer refurbishers and participants wondered how refurbishers will be able to stay competitive in such a high demand environment. Participants called for increased transparency in telecom fees and increased consumer protections. Consumers may sign up for one fee but can later be charged a different amount by ISPs. Participants feel that it is problematic to rely on ISPs to deliver affordable options without building in consumer protections and making sure there are penalties and repercussions for ISPs who do not deliver what they have promised. Finally, some participants spoke about the need to utilize existing connections such as dark fiber and pole connections. As funding is distributed, there should be strong measures taken to ensure asset owners share assets and resources to reduce costs for all.</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
66	<p>Definitions: There were multiple concerns raised regarding the definitions of key terms used in the SDEP. One participant remarked that they would like to see more plain language implemented into the Plan to increase its accessibility. Many participants identified key terms that they felt needed to be better defined in the Plan: Broadband: Conversations emphasized the need to define broadband, as well as high-quality internet infrastructure. Participants cautioned against allowing the availability of cellular or satellite service to qualify an area as served. In-home subscriber-based services without capped data plans and uncapped wired service were suggested as essential standards. Affordability vs. Availability: Participants feel the Plan needs to better differentiate between affordability and availability, as these are two distinct challenges in bridging the digital divide, although they are often conflated. Digital Skills vs. Digital Literacy: Some felt that digital skills and digital literacy should be better differentiated in the Plan as the two concepts are often incorrectly conflated. Rural: Multiple participants were concerned about the definition of rural areas. These concerns were especially echoed by residents of rural areas in New York State that have not been marked as rural—for example, there was a participant from a rural town in Albany County that is marked as not rural. Participants suggested that more accurate data be collected to clarify and improve the Plan's definition of rural areas. Cybersecurity: Participants feel that the Plan needs to better clarify what it means by cybersecurity and that the Plan's current use of the concept is too broad. In addition to identifying key terms that need further definition, participants pointed to specific items in the Plan which they feel need improved clarification. One participant is unsure that the measurable objective to increase "the number of assets providing privacy/security training" is enough and they would like to see that objective be made more specific. Participants additionally felt that the Plan needs to clarify what it means by "strengthening networks." This</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Followup meetings with stakeholder held. Glossary of 'Key Terms' added to Chapter 7. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>strategy, in its current formulation, was unclear to participants. Cybersecurity: The topic of cybersecurity was frequently brought up by attendees, often in combination with other concerns such as equity and accessibility. Commenters emphasized that all digital literacy training needs to contain a cybersecurity component. Cybersecurity training needs to be ongoing since threats, and the tools to combat them, are always changing and evolving; examples given included AI, malware, and social media scams. A few attendees spoke about the importance of equity when thinking about cybersecurity; some groups and communities are more at risk than others. As with other topics, commenters stressed the need to create materials and classes in multiple languages and accessible formats. Importance of Investing in Existing Digital Literacy Programs: Many attendees applauded the decision to work with libraries, non-profits, and other existing digital equity practitioners to expand and amplify the work that is already being done. Many organizations who have expertise and experience in this space are at capacity in terms of funding, staffing, and resources. These practitioners have already done the critical work of establishing trust within their communities. Covered populations in particular may have past negative experiences or distrust of ISPs or government funded programs. It is critical to invest in community organizations and institutions who already have relationships with these groups. It is also important to continue to work with established government agencies who have expert knowledge and experience working with the covered populations. Other commenters stressed the importance of supporting and funding programs and services that are designed and run by the covered populations themselves. One example is TechKnowledgeMe, an organization that is run by people with developmental disabilities for people with developmental disabilities. Attendees emphasized that wraparound programs that integrate digital inclusion work into other human services such as childcare, transportation, and food assistance, have</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>been key to bridging the digital divide in New York State. Attendees recommended that more of these services be created. They noted that wraparound services are useful in connecting people to digital training and other resources that they may otherwise be unable to access.</p>	
67	<p>Accessibility: Many attendees emphasized the importance of including accessibility in all aspects of the Plan. Some participants stressed accessible technology, applications, and devices for people living with disabilities, while others focused on making training and materials accessible to people with language barriers. Both these groups are covered populations. One commenter appreciated that the Plan differentiated between various types of devices such as laptops, tablets, and phones. All-in-one devices such as laptops are essential for people with disabilities, as are devices that have sizable screens which can display large text. Other attendees agreed that having accessible devices for people with disabilities is crucial. There were some concerns raised over accessibility devices. One participant noted that many devices which are considered assistive devices are medical and therefore, cost prohibitive. Individuals that do not receive Medicare or Medicaid assistance are typically not eligible to receive these assistive devices so there is a very real need to develop more mainstream alternatives to accessible devices. There were discussions on the accessibility of government websites. Attendees noted that it is especially difficult for individuals with visual impairment to access government websites because there are no current standards for accessibility across all government sites. Translation services are additionally needed on government websites. Attendees additionally felt that ConnectALL's fourth strategy to "confirm existing State and local government ability and tools to enforce or guide standard-setting for State and local government websites" needs to be more forceful. A policy needs to be created so that all state and government websites are compliant with accessibility</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement for people living with disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>standards. Other participants stressed the need for emergency services/notifications on government websites to be made accessible as well. Providing resources in languages other than English is important, but attendees noted several issues that arise when working with people with limited English proficiency. The plan should consider not only word-to-word translation of resources, but also gaps in adapting cultural competencies. Digital literacy training should be available in multiple languages, and bilingual staff should be hired and trained. Finally, language barriers specifically around digital health services should be considered. Immigration concerns were also discussed. Attendees noted that some immigrants fear that they can get deported by entering their information into government websites. Those who currently work with immigrant populations often pair immigrants with trusted professionals, such as community health workers, to help broker the trust issue. Lastly, participants stressed the need for digital literacy training and programs to have a focus beyond workforce development. It is critical to provide digital literacy training specifically targeted to the Plan's covered populations. Digital navigators were also discussed. Participants noted that aging individuals, veterans, and people with disabilities need to be taught devices and digital skills in a way that is reflective of their unique needs and learning styles.</p>	
68	<p>These comments are compiled from the participants of the Mid-Hudson Public Comment Session. Broadband Accessibility & Affordability COMMENT: The areas with households that have not been enrolled are not identified RECOMMENDATION: Include broadband maps within the plan (may be part of BEAD) RECOMMENDATION: Create a visual map of ACP enrollments and identify what areas are under enrolled to focus outreach efforts in those areas COMMENT: The claim that there are broadband options available is invalid if people aren't even aware of the options in the first place. There is a barrier to awareness.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement for people living with disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>RECOMMENDATION: Require ISP to have transparency of advertising of bundled and unbundled options COMMENT: It is unclear what "change ACP implementation policy" refers to. RECOMMENDATION: Improve ACP outreach by creating automatic triggers that alert someone of their eligibility for ACP. Do this beyond the information given at the DMV. For ex: Add it to shared information when someone registers for a governmental benefit. Accessible Devices & Support COMMENT: Device need is currently defined by household, not by individuals RECOMMENDATION: Device ownership should be written as one-to-one device ownership COMMENT: There is not a clear definition of what "accessible" means. RECOMMENDATION: Define accessibility by type (accessible content, accessible devices, etc.) COMMENT: It is unclear who will be running this - is there going to be a division of the CAO office that is taking this on? RECOMMENDATION: Clarify which positions within CAO will be responsible for each part of the plan COMMENT: Partnering with large organizations like Americorps or the Kauffman Foundation that match volunteers to organizations in need should be considered. RECOMMENDATION: Indicate that national partnerships will also be encouraged to leverage success. Digital Literacy COMMENT: Even if someone is given a device, they don't have the skills to use it. RECOMMENDATION: Make sure that digital literacy is funded and prioritize at the same levels as device access and internet access. COMMENT: Digital literacy can be best delivered when piggybacked on other programs RECOMMENDATION: Give strong consideration of supporting programs that already exist and fund them to add digital literacy to their program Privacy & Cybersecurity COMMENT: There needs to be funding resources for online safety trainings and awareness of safety measures RECOMMENDATION: Provide funding to organizations providing safety and cybersecurity training as part of the capacity building grant process Accessibility of Essential Resources & Services COMMENT: Limited</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>access that women and at-risk youth have to resources to help with their education and career advancement. RECOMMENDATION: Women and at-risk youth should be considered target populations even though they are not considered "covered populations" under the NTIA definition. COMMENT: Draft is not inclusive of range of disabilities including but not limited to: visual, auditory, sensory, perception, cognitive, dexterity and more RECOMMENDATION: Plan should specifically address differing disabilities and programs/devices/resources needed to serve persons with these disabilities COMMENT: It is required by law that for every agency they have an ADA coordinator and there was no visible contact on the plan's web page or in the draft. RECOMMENDATION: Ensure inclusion of ADA Coordinator information for accessibility purposes (legal requirement) COMMENT: The quality and consistency of online public resources and outreach campaigns is weak. RECOMMENDATION: Increase quantity and quality of public outreach and publicly available materials about all facets of the SDEP development and the programs, RFPs and overall work that is implemented to fulfill the plan COMMENT: The plan is not accessible to non-English speakers even though the survey and other data collection methods were available in other languages RECOMMENDATION: Provide plan documents in multiple languages COMMENT: The plan is not accessible for community members without devices (offline) RECOMMENDATION: Make copies of the plan available in hard copy for review in places like public libraries or other community partners</p>	
69	<p>1.0 Executive Summary In reviewing this plan, NYSDEN members consulted the original 13 recommendations stated in our August 31, 2023 letter to Joshua Breitbart (at https://docs.google.com/document/d/1BJPyCAm05yddJm7YFQjifiNvsu__ffdxffL7W5m2-xM). The comments below express support for the areas where our recommendations were included, and concern where they were not. These comments also include the topics</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>highlighted in NYSDEN's listening session with the CAO on November 20, 2023. COMMENT: NYSDEN is not recognized in the plan appropriately based on all the work that was done by NYSDEN members and organizations leading up to the SDEP.</p> <p>RECOMMENDATION: NYSDEN should be recognized as a partner due to all of the work that has been done through the network in order to complete the tasks leading up to the plan. Currently, NYSDEN is only explicitly named once in the plan, in Chapter 3, in Table 2: Digital Equity Coalitions. NYSDEN should also be named as an asset in sections 1.3, 2.4.1 and 3.0 or 3.1.</p> <p>COMMENT: The plan does not differentiate between networks and coalitions. RECOMMENDATION: Define the terms "network" and "coalition" clearly. For example, NYSDEN is a network of local coalitions. COMMENT: Developing the capacity of Digital Equity Coalitions and Networks is key to the success of the plan and will strengthen the implementation of CAOs objectives.</p> <p>RECOMMENDATION: Direct capacity building grant funding to help with organization and structure would help to strengthen coalitions (p. 11 and 13). COMMENT: In section 1.2 about strategy and approaches, 3 out of 4 require coordination of efforts across different organizations, but without details of how to support this coordination. RECOMMENDATION: Clarify COMMENT: Capacity building can not be reimbursement-based grants as most small organizations do not have the funding to float expenses while waiting for reimbursement or apply for bridge loans and it is extremely problematic. In some cases, it is close to 18 months between the start of the project and when the grant is paid. RECOMMENDATION: Capacity building grants should be paid upfront. COMMENT: There are no dollar amounts tied to grant categories (p. 18) RECOMMENDATION: Approximate dollar amounts should be tied to grant categories (p. 18) COMMENT: References are made to racism when discussing the digital divide, however the word is not specifically mentioned COMMENT: There is an omission of those who specifically choose not to be</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>online for a multitude of reasons RECOMMENDATION: Off-line support needs to be provided for those who choose not to be online to access online-only resources COMMENT: There are mentions of the limitations (one-time nature) of funding (1.2) but no recommendations for continued/future funding. RECOMMENDATION: Anticipate sources of future funding COMMENT: Lifelong learning is only mentioned in the Executive summary on page 11, but should be emphasized as a part of sustainability COMMENT: Libraries are mentioned frequently throughout but not all residents are reached through the public library system. The library system is also not always well-equipped to handle digital equity needs. RECOMMENDATION: Mention other assets besides the public libraries that provide digital equity services (nonprofits, community partner organizations, etc.) COMMENT: Appreciate the mention on page 18 of the need to source and retain talent for digital equity education programs</p>	
70	<p>2.0 Unified Vision COMMENT: There are no details about how and why the Digital Equity Task Force members were chosen. RECOMMENDATION: The New York State Digital Equity Network - a membership organization of the State's leader in digital equity and inclusion - should be included as a member of the Digital Equity Task Force (section 2.4.1) COMMENT: Measurable objectives in 2.4.2 are too vague. There is no baseline data, no goal, and no timeline for each one. Language is vague (i.e. "xx will increase."). RECOMMENDATION: Objectives should be written as SMART (Specific, Measurable, Attainable, Relevant/Realistic, Timebound) goals. RECOMMENDATION: Collaboration with the Digital Equity Task Force and local coalitions can help to clarify the objectives and metrics so that they are more specific. COMMENT: We appreciate the consideration on page 26, section 2.4.2, following our the recommendations in our August letter, to "Consider allocating a portion of capacity grant resources toward the creation of a participatory budgeted and governed</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>fund so local digital equity and lived experts can steward capacity grant funding as they see fit."</p> <p>RECOMMENDATION: Working through the Coalitions with community practitioners who have a long history of digital program impact vs. non organized efforts will help guide impact numbers. COMMENT: The ACP has been repeatedly pushed as a solution to broadband adoption, but we found that many members of covered populations are not eligible, or the application process is too difficult, which ties to existing government mistrust. RECOMMENDATION: Under 2.4.2.1, ACP alternatives should also be emphasized. Public data networks and hotspot lending programs have been successful alternatives that don't require individuals to go through the hoops required for the ACP. COMMENT:.. Corporate and state education computers that are refurbished with upgrades for continued life help with defraying new equipment costs. RECOMMENDATION: Under 2.4.2.2, the state must increase funding to organizations providing low cost IT support. This will decrease electronic waste and make devices more maintainable/affordable for the public. Any equipment must come with warranty and tech support. RECOMMENDATION: To support 2.4.2.2, there should be additional points /scoring within the RFPs for programs that choose to engage with extended life programs, or that include trade in / trade up equipment programs, to help extend funding. RECOMMENDATION: Many NYSDEN members emphasized that investment in desktops, that will remain in the home, should be a baseline objective for the program. Each additional device such as a smartphone or laptop will increase ownership of and number of devices accessible at home. RECOMMENDATION: Strategic placement of community available computer labs should be maintained for additional access points.</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
71	<p>Coverage, Availability & Speed The Report accurately identifies that the FCC's Broadband Data Collection Map is flawed. The map overstates broadband coverage & availability at 97 percent throughout the City and Monroe County. Rochester area local broadband speeds (83.99 Mbps download / 10.55 Mbps upload) are slower than the New York State median and the newer FCC threshold of 100/20 Mbps. There are indications that an even newer standard of 100/100 Mbps is on the horizon. • The Plan must include 100/100 Mbps speeds as the plan floor. The current plan threshold is not sufficient to support modern digital needs such as telework and telemedicine. We know that significant gaps in coverage exist and we must link data from all sources (e.g., government, community, institutional, industry, etc.). • The Plan must include measures to adequately update and calibrate Federal and New York State mapping profiles to accurately reflect current performance. • This Plan must include a comprehensive approach that appropriately balances the needs of all citizens and effectively leverages resources for a greater return on investments (ROI). The Plan should:</p> <ul style="list-style-type: none"> o Increase the prioritization for publicly assisted housing. i,§ These properties provide a significantly high return on investment (ROI). o Address digital deficiencies of school-aged individuals, often assumed to be digitally literate. Survey data has been utilized to construct the current plan. • The Plan must recognize that outreach to and inclusion of populations that are currently digitally challenged/resistant is vital to the reliability and validity of the data collected. The Plan should adjust its survey tools to: o Utilize nontraditional survey sites that provide access to difficult to reach populations and engender trust. Examples include but are not limited to: i,§ Laundromats, i,§ Health Care Facilities, and i,§ Barber Shops / Beauty Salons o Adequately explain or eliminate technical jargon (e.g., DSL, fixed wireless, satellite, dial up, hotspots, etc.). <p>Affordability (City of Rochester/ Monroe County) In light of finite government</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>resources, affordability is a concern, especially for HUD Low Median Income (LMI) areas. Broadband Services are vital but unaffordable to many: 78 percent pay more than \$50/month and 47 percent pay more than \$75/month (US Census Bureau, American Community Survey). The City of Rochester worked with Monroe County to identify and increase deployments in zip codes 14604, 14605, 14608, 14611, 14614, and 14621, their most underserved and economically disadvantaged areas. It is clear that there are significant issues regarding the paucity of both urban and rural broadband connectivity. However, in addressing those issues, the Plan should avoid an "either/or" zero sum scenario that creates an adversarial construct between urban and rural communities competing for resources. The Plan should:</p> <ul style="list-style-type: none"> • Maximize coverage within targeted areas. • Address specific locations, zip codes, census tracts, blocks, neighborhoods, etc. • Promote collaboration on and assistance with: <ul style="list-style-type: none"> o Site selection and deployment. o Permitting, co-location, historic preservation, and other key factors. o Project definition and determination. 	
72	<p>Affordable broadband access is a vital public good critical to the educational, social and economic future of the City of Rochester (the "City"), Finger Lakes Region, and New York State. Even with ambitious and laudable efforts to ensure equitable access, a huge Digital Divide still exists. We have populations within the City who have been left behind, overlooked, and forgotten. These communities have become technological deserts reminiscent of the telephone deregulation days that spurred numerous equity and access lawsuits that lead to the early "Diffusion and Universal Service Funds." During that era, speeds were of the order of Kbps (kilobytes per second). Today, 25 Mbps (megabytes per second) is insufficient to perform needed activities across all sectors and uses. History has proven that technical adoption and diffusion is a bottom up process that often requires public intervention in the absence of market action. Whether it was rural electrification during</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>the 1930's Depression Era or the more recent environmental movements for clean air and water, those governmental actions improved quality of life, public safety, and enhanced economic opportunity. Likewise, we must take bold steps to increase connectivity and prevent technological marginalization of at-risk communities. "Digital Inclusion" assures that all individuals and communities, including the most disadvantaged, have access to and the full use of 21st Century information and communication technologies. The Digital Equity Plan Must Effectively Prioritize</p> <ul style="list-style-type: none"> • Affordable, robust, reliable, and unlimited broadband internet service; • Internet-enabled devices that meet the needs of the user; • Access to digital literacy training; • Quality technical support; and • Applications and online content designed to enable / encourage self-sufficiency, participation, and collaboration. <p>Roughly one-third of African American and Hispanic US households struggle with digital access, adoption, and literacy. There has been a persistent racial gap in adoption rates of digital technology. Deutsche Bank estimates that "76% of Blacks and 62% of Hispanics could get shut out or be underprepared for 86% of jobs in the US by 2045." Meanwhile, over forty percent of adults at or below the poverty line do not have reliable broadband of any kind, and adults making less than \$30,000 are half as likely to have home internet access as adults making \$75,000 or more per the Pew Research Center. In 2016, Monroe County and the City issued an RFP to perform an assessment of the current digital infrastructure for both entities. Magellan Advisors was selected due to their experience working with other municipalities. As a result of the information contained in the initial study, the City adopted Chapter 106 to standardize its telecommunications policy and provide the best possible services to Rochesterians. On January 26, 2023 Monroe County announced completion of the "Community Access Plan and Funding Strategy for Broadband", which was the result of a more recent 2022 infrastructure assessment performed by Magellan. The</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>City has worked collaboratively with Monroe County to identify unserved and underserved areas. In doing that work, the specific concerns and needs of underserved populations were a critical focal point. Among City Of Rochester residents: 17 percent of households have no computer, 27 percent of households are without any internet subscription, and 43 percent of households have an annual income of less than \$20,000. (US Census Bureau, American Community Survey) Coverage, Availability & Speed The Report accurately identifies that the FCC's Broadband Data Collection Map is flawed. The map overstates broadband coverage & availability at 97 percent throughout the City and Monroe County. Rochester area local broadband speeds (83.99 Mbps download / 10.55 Mbps upload) are slower than the New York State median and the newer FCC threshold of 100/20 Mbps. There are indications that an even newer standard of 100/100 Mbps is on the horizon. Affordability (City of Rochester/ Monroe County) In light of finite government resources, affordability is a concern, especially for HUD Low Median Income (LMI) areas. Broadband Services are vital but unaffordable to many: 78 percent pay more than \$50/month and 47 percent pay more than \$75/month (US Census Bureau, American Community Survey). The City of Rochester worked with Monroe County to identify and increase deployments in zip codes 14604, 14605, 14608, 14611, 14614, and 14621, their most underserved and economically disadvantaged areas. It is clear that there are significant issues regarding the paucity of both urban and rural broadband connectivity. However, in addressing those issues, the Plan should avoid an "either/or" zero sum scenario that creates an adversarial construct between urban and rural communities competing for resources.</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
73	<p>Survey data has been utilized to construct the current plan. The Plan must recognize that outreach to and inclusion of populations that are currently digitally challenged/resistant is vital to the reliability and validity of the data collected. The Plan should adjust its survey tools to:</p> <ul style="list-style-type: none"> o Utilize nontraditional survey sites that provide access to difficult to reach populations and engender trust. Examples include but are not limited to: <ul style="list-style-type: none"> • Laundromats, • Health Care Facilities, and • Barber Shops / Beauty Salons o Adequately explain or eliminate technical jargon (e.g., DSL, fixed wireless, satellite, dial up, hotspots, etc.). 	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
74	<p>The Plan should:</p> <ul style="list-style-type: none"> • Maximize coverage within targeted areas. • Address specific locations, zip codes, census tracts, blocks, neighborhoods, etc. • Promote collaboration on and assistance with: <ul style="list-style-type: none"> o Site selection and deployment. o Permitting, co-location, historic preservation, and other key factors. o Project definition and determination. <p>In recognition of the constraints on local partners in their ability to rapidly and effectively respond to funding opportunities, The Plan must:</p> <ul style="list-style-type: none"> • Provide clear guidance and lead time for the development of successful submittals. <p>To address the availability of devices to access the internet for marginalized and at risk populations, The Plan should promote programs that:</p> <ul style="list-style-type: none"> • Include the refurbishment of donated devices from business or educational partners, • Supply low/no-cost devices to persons demonstrating need, • Contain a technical workforce training program, and • Collaborate with local high schools and/or community colleges. <p>The Plan should:</p> <ul style="list-style-type: none"> • Require all new publicly assisted housing projects receiving government financial support to include High Speed Broadband installations (DHCR, HUD, local municipality, etc.). • Incentivize community Wi-Fi in open public spaces (Fairgrounds, Parks, Public Markets, Community Centers, etc.). • Dedicate Funding to Last Mile / Low ROI / GIG (Ultra-High Speed Connectivity) Economy Capital Upgrades. 	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	Collaborate with the New York State Education Department (NYSED), Department of Transportation (NYSDOT), and public transit authorities to provide Wi-Fi access on school and transit buses. • Students often do homework assignments during down time on the way to and from school, sporting events, and other extra-curricular activities. • Many individuals utilizing public transportation are members of the unserved / underserved target populations	
75	Defunding the NOVEL NY platform will harm the students of this state, particularly those in small schools such as the one in which I teach. In this day and age, ALL citizens of this state must have access to vetted, quality, diverse sources that promote learning. In our school setting, we teach the students how to use those sources to promote critical thinking and lifelong learning. State funding ensures equitable access for ALL residents of NYS; removing that funding will mean that only the wealthiest areas of the state will be able to continue to provide this access. The very name of your committee - ConnectALL - seems to indicate that you do not wish to create such an inequity of access. Action Request: I urge the ConnectALL Committee to continue to fully fund the resources our students and citizens have to come to rely on, so that they may continue to have full and unlimited access.	Comment reviewed and considered; automatic reply sent to commenter. Followup meetings with stakeholder held.
76	section 3.1.1.5 should include reference to expanding access to Court forms, help services, and filing opportunities, and filed documents.	Comment reviewed and considered; automatic reply sent to commenter.
77	Note that SCRLC is a quasi-state agency; we are also 501(c)(3); we report to the Division of Library Development but are not a unit of government as such. General: Thank you for your hard work on designing the plan; thank you, too, for involving the community. South Central Regional Library Council supports the comments made by NYSDEN and the	Comment reviewed and considered; automatic reply sent to commenter. Followup meetings with stakeholder held.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>Southern Tier Digital Equity Coalition, as a participant in both digital equity groups. Some coalitions, like STDEC, are pretty new. Moving forward, it would be helpful to provide capacity-building funding for all the coalitions, keeping in mind that this may look different for each coalition, based on location and length of existence. Under 1.1 Vision, item 2. "Improvement in the quality and accessibility of educational resources. NOVELny is set to expire June 30, 2024." NOVELny has achieved equitable access across the state to a suite of credible, reliable educational resources, and yet just as digital equity is moving forward in the State, the removal of this crucial resource will create a gaping disparity of digital resources for students and residents. NOVELny costs \$2.6M in the current year and may increase for 2024-2025. In that it is crucial for equitable digital literacy/fluency, this needs to be sustained. NOVELny is used by students at all levels from K-12 to college, researchers, and all residents. Regarding 1.5, moving forward it would be helpful to know how much funding will be allocated under each of the measurable objective areas designated in the Digital Equity Act (i.e., BB, internet-enabled devices and ongoing support, digital literacy/fluency, privacy/cybersecurity, and accessibility of public resources). 1.4. "CAO's Digital Equity Survey of New York residents, the first ever comprehensive assessment of the digital divide in New York State, received more than 5,700 responses." We are concerned about representation on the survey. Although we distributed paper versions, there were very few completed in our area. If overall 98% of surveys were completed by people having access to a computer, there were a lot of voices left out of this process. This needs to be mitigated in our collective future work.</p>	
78	<p>2.3 "Across all five outcome areas, public libraries in New York State have played a significant role in bridging the digital divide." The continuing role of libraries is essential to carry forward. It has been true since the very beginning of the digital divide and before the digital world existed: libraries equalize access to</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement for</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>information and resources. In today's world, they are more crucial than ever. Even as more people have home internet, libraries create and avail credible, reliable resources at their point of need. 2.3.2 "Encourage partnerships between government, educators, communities, and corporations to develop a comprehensive and unified vision for digital equity by defining broadband as a fundamental right, ensuring accessibility to all citizens and enabling them to pursue a quality education." Include libraries explicitly. We echo the sentiment that it is not realistic to completely move from building-restricted wifi and lending to home internet. It will need to be a combination for some time to come. Many library systems used ARPA funds to extend wifi beyond their building. These efforts will continue to be needed and expanded. There must also be incentives, i.e., how will partnerships be encouraged? Plus, peer-led trainers and digital navigators will need to be compensated. Libraries and human services organizations, e.g., programs for older adults, cancer resource centers, hospice, etc. that might want to offer navigators will need funding to build programs and compensate the navigators. Ensuring accessibility will also take funding. You will need to compensate consultants/new positions for accessibility experts (hopefully people from the disability community) to visit libraries, museums, and other spaces. Organizations will need financial support to implement the necessary changes/equipment. 2.3.3. Telehealth. Libraries can also be partners in telehealth—there are several examples of this type of collaboration around the state. For example, SCRLC had a grant to buy 19 telehealth kits with hotspots for 19 public libraries to use onsite or to circulate (all libraries circulated them). Use was expanded to all digital equity needs. One library user borrowed a kit to complete a semester at college. Another patron used a kit to remotely help her father who lived at a distance and did not know English. If we do move to a world where devices are not lent but owned by the household, libraries and other partners</p>	<p>people living with disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	will still be needed to provide training, support, and resources.	
79	3.2.2. Regional Needs Assessments. Regarding the snapshots, it would have been helpful to see how the covered populations in our area fit within the 5 areas of BB, internet-enabled devices/support, digital literacy/fluency, privacy/cybersecurity, and accessibility of public resources.	Comment reviewed and considered; automatic reply sent to commenter.
80	4.2.4. We are happy to collaborate with CAO as an individual council, through the Empire State Library Network (ESLN), STDEC, and NYSDENâ€”whatever makes sense to do, depending on the projects and community needs. As a founding member of STDEC, due to the rapidity with which our fledgling coalition needed to work, we were not able to reach or identify many potential partner organizations. This work cannot be done for free, and SCRLC or STDEC would have the funds to carry on without financial help. SCRLC also reiterates STDEC's need for more information about the Community Anchor Institutions to help with our regional planning efforts.	Comment reviewed and considered; automatic reply sent to commenter.
81	We could not find where assessment/evaluation methods are included and described. What are the outputs and evaluation methodology? Outcomes appears throughout the plan, e.g., Measurable Objectives begins in 2.4.2, but how will they actually be measured and evaluated? 5.1.2 Regarding the ACP, there must be subsidies to pay for the installation fees in addition to reduced monthly charges (or freeâ€”some of our Southern Tier focus group participants need free internet). Regarding Assistive Devices for Aging, vets, disabled, etc. This is in addition to having the internet. We also have to think of people who just do not want to be on the internet at all, or those who need to use it but	Comment reviewed and considered; automatic reply sent to commenter. Evaluation section added to Chapter 5.

	Public Comment	Written Responses and Actions Taken by State in Response
	do not want to learn beyond the immediate need or application. That is where digital navigators could be so crucial. Regarding Virtual/Video/Screenshare Technical Support, considering the level of trust of technology that many have, there need to be other options, e.g. support using a phone or even print guides with step-by-step instructions and screenshots. 5.2 Implementation Timeline. Please keep in mind that smaller organizations cannot carry out projects until the funding comes in. There needs to be great flexibility in this regard.	
82	Just a couple of additional comments as an individual. Under 1.5 Implementation Plan: We need to determine funding levels for each measurable objective areas designated in the Digital Equity Act (BB, internet-enabled devices/support, digital literacy/fluency, privacy/cybersecurity, accessibility & inclusivity of public resources). Under digital literacy/fluency, NOVELny funding should be considered, even if it means a different suite of databases (but please do include those heavily used like Opposing Viewpoints and Academic OneFile). It is such a crucial resource to our learners, researchers, and residents.	Comment reviewed and considered; automatic reply sent to commenter.
83	Under 2.4.2, the ACP: The ACP is not reaching households because it is not affordable for too many people—why there was only a 42% adoption rate. I personally paid a \$125 connection fee for a low-income relative so they could connect. Most low-income households do not have an extra \$125 sitting around to do this, nor someone in their family willing or able to help. As we know, students need internet access to succeed and libraries and other places are not necessarily accessible to students at their point of need (also why there needs to be a blend of supporting Anchor Institutions like libraries and home internet access). 2.3.3. These comments are under Health but are relevant to other areas, too. Digital navigators and peer-led training are essential ingredients to the advancement of digital equity. For the past 8 years, I	Comment reviewed and considered; automatic reply sent to commenter.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>have volunteered for a local hospice organization. I visit patients and make monthly phone calls to bereaved family members. This concerns the bereaved. Most, but not all, fall into the covered group of over 60. Since the pandemic, the support groups have been primarily online. Support groups are not everyone's cup of tea, but I have learned along the way that some either do not have internet at home or are not confident they can connect to an online support group (or other online events offered). "I'm too old to remember what to do" was a response I got just a few days ago. Sometimes a family member will help out, but often not. We also have to respect people's wishes to not want to be online. One guy told me, "I've lived all these years without it and I'm not going to start now!" So I would love to see hospice organizations, cancer centers, and other human services agencies have digital navigators to go to people's homes and help them get online to connect to a class or support group. Of course, there would have to be funding available—these are all under-funded agencies.</p>	
84	<p>Would like to have more 'hardcopy' materials to promote all focus groups, listening sessions, etc. If we are attempting to reach those WITHOUT digital access, they are not receiving communication about any of these events. While it is nice that there is an option submit comments via a Word document sent by email, this presumes the respondent is technically capable of using word and has consistent access to a personal email. This is not the case with many of the marginalized populations the plan is designed to assist. While I understand the limitations of the small, dedicated staff of the ConnectALL office, perhaps consideration could be given to having a phone # where people could leave recorded messages about their suggestions. I realize this would necessitate someone monitoring and transcribing the messages, but it would be very helpful for those who don't have reliable Internet</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	connectivity and/or a device by which to send/receive email.	
85	<p>Finally, New York's Digital Equity Plan should focus on established efforts to increase access and adoption. First, while Altice supports New York's extensive efforts to improve its residents' access to affordable broadband, it emphasizes that these efforts should focus on the goals of the Digital Equity Act ("DEA"). The State's proposal to increase the number of locations that have access to unbundled broadband is misplaced. Plan at 19; see also Plan at 95, 97, 127. Consumers have choices and there is nothing in the DEA to suggest New York should regulate market-based plans offered by providers. To the contrary, the availability of more service plans, all of which must be available to ACP customers, gives consumers power to select the plan that best serves their needs. In many instances, it is advantageous for a consumer to select multiple services. Additionally, providers already have extensive disclosure requirements, including the upcoming FCC's Broadband Consumer Labels, that clearly disclose rates and whether an introductory rate applies. For example, see the sample broadband consumer label here: https://www.fcc.gov/broadbandlabels. While consumer financial literacy is essential, efforts to distort the market and to push consumers to an unbundled plan do not promote adoption or accessibility. Altice is proud to offer a variety of broadband plans, allowing the consumer to choose which products best fit their needs. Second, consistent with Congress's and NTIA's goals, New York should focus on connecting unserved locations, accessibility, and adoption, rather than encouraging overbuilding. DEA Notice of Funding Opportunity at 20-22; Plan at 29; see also Plan at 96, 108, 126. While promoting competition and the number of providers in</p>	Comment reviewed and considered; automatic reply sent to commenter.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>an area is a laudable goal, the purpose of the Infrastructure Investment and Jobs Act is to get all consumers connected, not use funding to overbuild high-cost areas. Thousands of New York residents still need access to broadband and encouraging adoption by those who have access should be the priority. Efforts to increase provider competition, such as the 2021 Comprehensive Broadband Connectivity Act, are already underway in the State Legislature, and the State should ensure that any actions to fund increased competition are coordinated with ongoing legislative efforts.</p>	
86	<p>Commenting only to advocate for sustainable NOVELNY funding for ALL libraries</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Followup meetings with stakeholder held.</p>
87	<p>Moving forward, it would be helpful to provide capacity-building funding for all the coalitions, keeping in mind that this may look different for each coalition, based on location and length of existence. However, the existence of the NYS Digital Equity Network should also be formally acknowledged - it is the statewide communication channel for most of the coalitions for over a year now.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
88	<p>The continuing role of libraries is essential to carry forward. across all objectives. However, it is not accurate to say it is the role of librarians only - the library can be the location for multiple service providers to work on digital equity programming services for their unique audiences. And there are staff at libraries without Masters degrees who can also be recruited and trained to do important DE work.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
89	In general, I feel there was more "talking" and less "listening" on the part of the consultants who were structuring the way our listening sessions and focus groups were conducted. A basic question to lead all of these should have been, "Is this issue important to you and if so, tell me how or why"	Comment reviewed and considered; automatic reply sent to commenter.
90	4.2.4. Not all DE actions will need to flow from the VAO office - there should be multiple levels of administration, including grass roots	Comment reviewed and considered; automatic reply sent to commenter.
91	2.4.2 - how will these be measured? There should be input at all levels on measuring outcomes	Comment reviewed and considered; automatic reply sent to commenter.
92	Just in general, I have an elderly mother who I think is most typical of the senior population. She needs to be patiently and slowly educated to develop any digital skills - and maybe will never want to do that - a big reason to push for digital navigators. Also, I work on home instruction for students who are ill or suspended - they face many challenges and this is one that engulfs their entire family at times. For some it is affordability, for others it is technical, and again, requires patient education. Lastly, I am not convinced that workforce development is connected to challenges with digital equity in NYS - data shows most of the workforce has the internet and devices and can acquire skills internally through their places of employment - but what about our intention to recruit from the elderly, veteran, Indigenous, low income, formerly incarcerated and so on populations? I don't think any of the current private or public workforce programs are set up to meet those groups needs!	Comment reviewed and considered; automatic reply sent to commenter.

	Public Comment	Written Responses and Actions Taken by State in Response
93	<p>We here in Oneida County are disappointed that we would essentially have to own the broadband infrastructure in order to be successful in securing funding from ConnectAll. We have already proven that the public/private partnership model, which ends up with an ISP owning the infrastructure, can work well. Oneida County has no desire to own the broadband infrastructure as we have no way to maintain it or even understand the network. While we could own it and long term lease it to an ISP, that is just adding a level administration that ultimately costs more to execute and therefore will end up simply costing the citizens more money in service fees. Please reconsider this decision before deploying the program.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
94	<p>Section 6: Conclusion (page 141) AARP echoes the vision in the Plan's concluding section, which states, among other things: Based on an understanding of the broadband and digital equity gaps facing New Yorkers, CAO has developed strategies to ensure every New Yorker has equal opportunity to safely reap the benefits of the digital world. The New York State Digital Equity Plan is a first step to ensure that the funding available through the Digital Equity Act creates a meaningful and sustainable impact across New York State. As grant funding becomes available in 2024, CAO will continue to work with partners across the state to fulfill the strategies outlined in this plan and evaluate the State's progress over time towards its measurable objectives, all to the ultimate objective of ending the digital divide in New York. Plan, page 141. Section 7: Research Methodology (pages 143 - 156) AARP appreciates the clear and comprehensive discussion of the research methodology that CAO used to prepare the Plan (including the Survey Distribution Methodology, discussed at pages 143-151; the Focus Group Methodology, discussed at pages 152- 154; and the analysis of the Intersectionality of Covered Populations, discussed at pages 155-156).</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
95	<p>Section 1: Executive Summary (pages 11-15) AARP commends New York's ConnectALL Office (CAO) for its thoughtful, comprehensive and, clearly written draft Digital Equity Plan (Plan). (Governor Kathy Hochul established the ConnectALL Office (CAO) in 2022 "to transform New York State's digital infrastructure so all residents and businesses have access to high-speed, reliable, and affordable broadband for education, economic growth, and full participation in civic life." Page 12) Although the CAO has been recently created, New York has a long history of promoting broadband deployment and adoption: New York's digital equity practitioners have worked for decades to create sustainable digital equity ecosystems on local, regional, and statewide levels. These practitioners overcame conditions of scarcity in the funding landscape, and a lack of understanding of the importance of digital equity initiatives among many policymakers and members of the public, to build a powerful base of programs, partnerships, and coalitions bringing critical services to communities across the state and advocating for policies that better meet New Yorkers' digital needs. Page 11 AARP has actively supported advocacy in New York for reliable affordable high-speed internet access for years and appreciates the opportunity now to submit comments on CAO's Plan. New York is building off of a solid foundation of promoting digital equity. The Plan notes: "CAO, through its predecessor the Broadband Program Office (BPO) and in partnership with the New York State Library (NYSL), has convened representatives from State agencies since 2020 to develop strategy, obtain information on existing State programs and resources, and identify partners to support digital equity planning and program implementation." Page 13 The Plan is supported by extensive data analyses and research, captured in many tables and figures. The Executive Summary at the Plan's outset provides an excellent overview of the key elements in the Plan (unified vision, the state of digital equity in New York, stakeholder engagement,</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>and implementation). AARP's comments reflect a perspective based on many years of advocacy for older adults on many issues (transportation, housing, health care, etc.) and its active engagement with federal and state advocacy for affordable, reliable, sustainable high-speed internet access and devices, supported by digital literacy training and tech support. AARP has now reviewed twenty other draft state digital equity plans and so brings that perspective as well to its review of the New York Plan. In the years ahead, AARP welcomes the opportunity to work with CAO to contribute to the Plan's successful implementation.</p>	
96	<p>Section 2: Unified Vision ("Introduction, Vision, and Objectives" in public comment webform pages 17-32) AARP supports fully New York's multi-faceted vision for digital equity and appreciates the fact that CAO's responsibilities encompass all elements of digital equity – availability, affordability, digital literacy and data gathering, analysis and reporting. Plan, page 18. This integration by CAO of programs for infrastructure deployment with programs that ensure New Yorkers can afford and have the digital skills necessary to take advantage of reliable high-speed internet access is essential to achieve and to sustain digital equity. AARP also commends CAO for its front-and-center support for publicly owned and operated networks, which can lead to more affordable high-speed internet access than that which commercial providers offer. (Most draft state digital equity plans lack this element of digital equity). Among the grant programs administered by CAO is the "Municipal Infrastructure Program" for municipalities, nonprofits, and other entities to construct open and accessible public broadband infrastructure. Page 18 AARP supports fully the Plan's five principles, which are based in part on stakeholder engagement. Page 19. The Plan explains how CAO's theory of change is driven by the need to identify multipliers that can amplify and sustain any financial investments we make. Page 18 AARP appreciates this recognition of the challenge of implementing a sustainable Plan – New York will</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>receive a one-time infusion of federal funds, and although, they are significant, the challenges of achieving and maintaining digital equity will continue for years to come. As noted on page 26, AARP requests the Plan further consider how to scale physical and digital accessibility across New York's public library system for covered populations (e.g., transportation to library, additional digital navigation programs, training provided on weekends and after business hours). AARP highly commends CAO for considering multiple exploratory methods to execute the strategy outlined in 2.4 "Strategy and Objectives." Allowing communities of practice to facilitate participatory program design, and publicly releasing data is especially important as States across the country look to build interoperable programs and databases. Please ensure covered populations and people with lived experience are included in this activity. Overall, the vision and principles in the Plan are consistent with AARP's many years of high-speed internet advocacy at the federal and state level. AARP appreciates the Plan's emphasis on collaboration with different partners, public and private. Measurable Objectives AARP supports the Plan's well-articulated objectives as they relate to all five categories with one caveat. Among the Plan's objectives relating to affordability is the goal of increasing the share of locations that have more than one ISP. Page 29. AARP welcomes competition among ISPs, but only where markets can sustain such competition: the presence of multiple providers, indeed, can drive down prices and raise service quality. However, not all areas of the state can support multiple providers. Where it is particularly costly to deploy infrastructure, providers are not likely to enter the high-speed internet market and it is not likely to be economically efficient to subsidize more than one supplier with public monies – instead, to achieve affordability in high-cost areas, recipients of public monies (e.g., BEAD grants) should commit to affordable prices, and non-profit or municipally/regionally owned networks can be explored. AARP welcomes the Plan's objective of</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>ensuring that consumers have access to "unbundled, affordable broadband service," and shares CAP's concern that "service bundling [is] a challenge for consumers seeking to minimize the cost of broadband service." Page 29. AARP supports fully CAO's plan, as part of its BEAD middle-class affordability plan, to "require prospective subgrantees to offer at least one unbundled broadband product with a transparent price (i.e., no hidden fees) and certify that it will continue to provide this option to middle-income households for six years." Page 29. Based on its extensive experience with the Affordable Connectivity Program (ACP), AARP shares CAO's concern that "[m]any eligible New Yorkers are not aware of the ACP subsidy, and some New Yorkers who are aware of the subsidy cannot or do not use it." Page 29. AARP supports fully CAO's intention of pursuing proven models to expand ACP outreach and supporting public education and awareness campaigns so consumers better understand the ACP, and AARP is fully prepared to contribute to these critically important outreach and education programs to lead to increased ACP enrollment. Page 29. AARP also actively advocates for continued funding for the ACP (or a successor program) - this funding is essential in order to achieve digital equity.</p>	
97	<p>Section 3: State of Digital Equity in New York (pages 34-106) Asset Inventory (pages 34-46) AARP commends CAO for its comprehensive efforts to build a useable inventory of assets that can guide New York's successful implementation of this Plan and that can inform stakeholders and representatives of covered populations as they seek to achieve digital equity. AARP appreciates the inclusion of its affiliate, Older Adults Technology Services (OATS), Inc. as a "unique asset meeting the needs of specific covered populations." Pages 37-38. New York stands out for its successful efforts to increase ACP participation. This level of ACP participation exceeds that experienced in other states. Needs Assessment (pages 47 – 106) AARP is impressed by CAO's rigorous, data-driven,</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>well-researched, and comprehensive approach to assessing needs for achieving digital equity. The Plan's findings regarding aging individuals are consistent with AARP's experiences during its state and federal advocacy for affordable, reliable high-speed internet access and devices, supported by digital literacy training and tech support. In AARP's view, indeed, aging individuals need confidence and skills to protect themselves from online security and privacy threats o</p>	
98	<p>Section 4: Stakeholder Engagement (pages 108-122) AARP commends CAO for its comprehensive engagement with stakeholders and representatives of covered populations from throughout the State and its impressive collaboration in developing the Plan. AARP is hopeful this collaboration will provide a solid foundation for the successful implementation of the Plan in the years to come. AARP appreciates the inclusion of its affiliate among the stakeholders engaged by the CAO (Older Adults Technology Services from AARP). Plan, page 119. In many other states, AARP has commented on the lack of communication in languages other than English on the sites where draft digital equity plans are posted and where the process for submitting comments is described. AARP commends New York for including a link to a version of the Plan that has been translated into Spanish as well as its communication in Spanish on the CAO web site.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
99	<p>Section 5: Implementation (pages 124 – 139) The Plan includes "approaches to meeting needs and filling gaps identified in Chapter 3," and indicates that this section of the Plan is not intended to be exhaustive. Plan, page 124. The approaches shown seem practical and ambitious. AARP recommends the inclusion of an additional approach, relating to data transparency. CAO includes valuable information, data, tables, maps and figures throughout the Plan. AARP is hopeful that the final Plan can include a commitment to continue to update, analyze, and report data. Based on its long-running advocacy for affordable, reliable high-speed</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>internet access and devices, supported by digital literacy training (including federal advocacy for the Emergency Broadband Benefit Program and the ACP as well as its review of twenty other draft state digital equity plans), AARP recommends that the Plan expand its discussion of data gathering, analysis and reporting. AARP recommends that CAO add a section to the Implementation section in the Plan to commit to ongoing data gathering, analysis, and reporting so as to guide New York's successful achievement of digital equity. New York could tap into the expertise in its educational institutions to bring GIS, statistical, and other skills to the State's efforts to identify gaps in digital equity and to monitor its success in closing those gaps. Making this information readily available to all can help community-based organizations tailor programs and adopt best practices. For example, such informational tools could include: â€¢</p>	
100	<p>"As we chart the course to bridge the digital gap in New York State, let's put people first by prioritizing no-cost broadband adoption programs in our Digital Equity Plan. Taking a cue from our neighbors in Connecticut, who've made strides with direct subsidies, it's time we acknowledge the impact of targeted efforts. Just look at initiatives like Big Apple Connect a partnership touching the lives of over 100,000 NYCHA households with uninterrupted high-speed broadband. Our State Digital Equity Plan needs a human touch; it should explicitly embrace and support no-cost broadband adoption programs, tackling known barriers so that everyone can access the opportunities of the digital age. Let's add a touch of compassion to our language: 'Eligible uses for program funding may also include non-deployment projects to support the adoption of broadband services, including programs that offer low or no-cost broadband service to low-income households.'"</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
101	<p>Columbia Economic Development Corp, Columbia County's leading economic development organization, believes that New York State's digital equity plan is a crucial step towards ensuring that all residents have access to the necessary resources and opportunities in the digital age. By focusing on bridging the digital divide, the plan aims to provide equal access to high-speed internet, digital devices, and digital literacy training. This will not only empower underserved communities but also foster economic development and educational advancement across the state. It's important for the government and private sector to work together to implement this plan effectively, ensuring that no one is left behind in the increasingly digital world.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
102	<p>Page 124, How will the state focus investments in internet infrastructure in low income areas? Will this be a part of the BEAD program? If so it is not clear how it will be scored / prioritized in the BEAD planning documents. Page 126, Is it possible for the state public service commission to address the bundled service issue raised here? Page 127, to what degree can the state incentivize (or require) ISPs to inform their customers of the ACP subsidy at the time when they activate service AND as a part of their billing system? Also it seems like school districts could be a good way to promote this subsidy since they are typically aware of which families need the benefits. Page 129, it seems like more detail is needed to understand which assistive devices are most needed. Pages 130 – 136, check the numbering on all strategies. Some numbers are skipped. Page 131, These efforts will need advertising / marketing support to ensure that residents know about the device recycling and disposal options Page 135, Strategy #2 is the most important of these that the state can help with. State or federal regulations can put some guardrails in place to protect consumers from scams and punish those who violate peoples privacy online. Page 135, Consider additional strategy to help people recover from online scams and privacy</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	violations. Consider how your office can help victims restore their trust in online systems.	
103	Please consider adding "Youth" as one of the covered populations described in this plan. Youth have specific needs relating to the use of the internet for education and specific challenges around privacy and safety. Focusing Digital Equity investments on Youth can have long lasting and exponential benefits since youth will outlive other population groups and those who become digitally literate early in life can support their relatives and other 'covered populations' in their progression to become more savvy online.	Comment reviewed and considered; automatic reply sent to commenter.
104	This comment is to elaborate on Section 2.3.5 "Delivery of Government Services" in regard to Digital Navigators programs and digital literacy. Since 2022, libraries and community-based-organizations in the mid-Hudson region have collaborated with our organization to provide Digital Navigator service to their already existing services. Through grant-based and legislative funding, we have been able to offer financial support to over 100 individuals at 60+ institutions to help clients with digital literacy, device acquisition, and broadband access. The work is ongoing and growing, but the funding sources have been temporary. If we were to receive funding through the state's digital equity plan, we could sustain our program and expand it to include more comprehensive digital literacy training programs for covered populations. We could also serve as a model for other regions who have similar needs but lack the resources and the connections that come from a consortium like the councils of the Empire State Library Network. We have partnered and collaborated with agencies who provide childcare assistance, food benefits, and other social benefits. They have told us that when questions about digital literacy arise with their	Comment reviewed and considered; automatic reply sent to commenter.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>clients, the most efficient course of action is to refer them to the services of library or similar for the one-on-one assistance given by Digital Navigators. Digital Navigators are also in good position to advise on or teach digital literacy training if funding were to become available to develop that curriculum. Furthermore, the community of practice that we created through the Digital Navigator program has helped the Navigators themselves learn more about the concepts of Digital Inclusion and Digital Equity. As they have grown their skills and connected with each other, they have become advocates for their clients and ambassadors in the field. Our Navigators have reported back things such as "Our patrons often remark that our services have proven to be invaluable to them, and have resulted in them feeling more confident in their skills." and "Being a digital navigator has helped me to help my community members in not just technology, but also confidence in knowing the library is a place for help."</p>	
105	<p>We want to bring two considerations to light. The first is the plan's lack of recommendations to increase the digital equity for children. We know the digital divide in children leads to reduced graduation rates, lower college enrollments, and less access to increased and varied educational resources available online. All of this can exacerbate generational poverty or increase incarceration rates. We urge ConnectALL to provide more concrete recommendations that can impact the future of New York's children. Second, we urge ConnectALL to develop affordable internet programs and solutions that do not rely solely on the ACP, which is at high risk of running out of funding next year. As seen in the Digital Equity plan, significant portions of the Southern Tier region are considered rural and low-income and residents expressed concerns about high prices related to income and a lack of competition. Affordability is fundamental to equitable access, and New Yorkers deserve safeguards beyond the ACP.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
106	<p>BronxNet is pleased to have the opportunity to comment on ConnectALL's NYS Digital Equity Plan. We are concerned that the State Digital Equity Plan as currently drafted does not sufficiently recognize the role of community media centers in ensuring that digital equity is achieved in communities throughout the state and in particular in low-income communities like the South Bronx, which BronxNet is proud to serve. Our comments focus on the public services technological resources we provide that fall under the realm of the digital equity, digital inclusion and workforce development aspects of the NYS Digital Equity Plan. BronxNet serves communities across the Bronx including from 3 state of the art BronxNet production studio facilities and in schools and various other locations. BronxNet is the public service multimedia network of the people of the Bronx providing workforce development and experiential learning opportunities for the public and middle school, high school and college students, and distributing award winning multicultural and multilingual content reflecting the diversity of The Bronx across six 24/7 Multiplatform channels. The Bronx has a large low-income population, single parent households, and residents of NYCHA buildings. The Bronx also has one of the youngest populations, with 24.8% of the population under age 18. The Bronx continues to experience elevated high school dropout rates, and a high number of students unsure if they will attend college now or ever, according to NYC.gov borough reports. BronxNet has provided career building experiential learning opportunities, internships, and fellowships for thousands of students and we are expanding our services across this borough of 1.5 million people. Where there are great tech inequities with low broadband adoption, we recently opened to the public our newest location The BronxNet Media + Technology Studios at La Central in the South Bronx featuring multimedia production spaces including a new media immersion studio, XR production stages, a Windows on The Bronx Studio, innovation labs, learning labs and more. The BronxNet Media +</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>Technology Studios are conveniently located in the HUB, also known as the Times Square of the Bronx. We are easily accessible via subway and buses. Our community includes NYCHA residents, low-income and BIPOC individuals and families. Much of our community has difficult access to reliable internet, access to technology equipment and are deficient in digital literacy. BronxNet's Media + Technology Studios also provides a creative space for media artists, filmmakers, social media influencers, animators, and game developers, who will gain access to enterprise level media technology, editing stations, innovation labs and classrooms with media arts and technology workshops for the public. BronxNet has been providing community media services to Bronx residents for over 30 years, helping to bridge technological gaps. Our technological resources, media and technology workshops, and local content provides media technology access, education and broadcast and online programs for Bronx residents, organizations and students. Over the course of these three decades, we've provided services for thousands from BronxNet's renovated and upgraded Network Operations at Lehman College in the North Bronx. A community needs assessment determined that the people of the South Bronx need access to BronxNet's services so we opened BronxNet at Mercy College in the East Bronx, and The BronxNet Media + Technology Studios in the South Bronx. BronxNet has a strong track record with media workforce development. Over the years, students who have participated in our internship programs were able to obtain mid-level and high level positions in the media industries. That includes positions as engineers, post production supervisors, award winning animators, news anchors, producers, assignment desk editors and more. Our local content, produced by BronxNet staff, interns and Bronx residents help keep viewers up-to-date with vital information, discussion, and analysis on important issues that impact their lives, whether they are viewing on BronxNet channels or at www.bronxnet.tv. We are meeting people where they are. Whether it's high school</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>and college students seeking digital media workforce experience to jump start their careers, Bronx residents in need of technological resources to create their own content, low-income households or anyone without the proper computer equipment or the know how they need to create shareable video content, or elderly people in need of basic computer and apps training to enhance their ability to communicate with others. BronxNet is here with media technology to meet the needs of individuals from many backgrounds and at all levels. We are working to help advance tech equity in the Bronx and helping Bronxites be a part of positive transformation in our communities, as community engagement is at the heart of what we do.</p>	
107	<p>Part II. Unified Vision Section 2.3.1 Economic and Workforce Development Recommendation: The CAO office should not solely host digital skills training on workforce development platforms. Existing resources, including those focused on economic and workforce development, such as the DOL Career Centers and CareerZone, are not designed to effectively serve non-native English speaking adults, adults with low literacy and/or limited formal education, and adults working in survival jobs. Therefore, digital skills programming for this covered population should be offered in conjunction with adult literacy programs who are already situated in communities and are providing services at the level and with the resources students need to be successful.</p> <p>Section 2.3.4 Civic Engagement Recommendation: Civic engagement for some covered populations, including those with a language barrier, is most effectively promoted through adult literacy programs. CellEd and CitizenshipWorks can be effective supplementary tools, but students will be most effectively engaged through instruction. Given members' experience with Cell Ed, it is also recommended that Cell Ed's data tracking be improved in addition to updating its portal functionality.</p> <p>Section 2.4.1 Theory of Change, Strategies and Sample Activities Recommendation: Digital Equity Coalitions are vital in</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>implementing the work laid out in the digital equity plan. Funds must be created to support their work and ample time must be provided for data collection and to perform outreach to serve the goals of the ConnectAll Office. Guidelines should be created on how to successfully include CBO clients' participation in the commenting period, and have representation in digital equity coalitions. Standards must also be created on how to approach digital equity work using personal lived experience. More broadly, there needs to be an effort for local governments to step up and match the competitive grants that are awarded to community based organizations.</p>	
108	<p>Part III. State of Digital Equity in New York Section 3.2.1.4. Individuals with Language Barriers & Section 3.2.1.9. Other Communities Recommendation: Based on the data collected by CAO, Limited English speakers are a group that face significant barriers to digital equity. This group, which is largely made up of immigrants, needs very specific, culturally relevant, and tailored materials in order to bridge this gap. Community based organizations that are trusted by these populations are uniquely positioned to offer digital equity services that meet the needs of the very diverse group of limited English speakers in New York state. Building the capacity of these programs through additional funds for staffing and services are crucial to lowering barriers and rates of disconnected New Yorkers. Section 3.2.2. Regional Needs Assessment Recommendation: Regions like Staten Island and Long Island are described as having higher median incomes compared to other parts of the state. However, the income disparity in both of these regions are very pronounced and framing both regions as wealthier ignores the needs of marginalized communities that live within those regions. The wording of that phrase should be edited to reflect the digital equity gaps that exist in all regions. Section 3.2.3.3 Digital Literacy Recommendation: Marketing is most effective at the program level and done in conjunction with trust partners in high need</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	communities. Programs and coalitions should be supported, financially and technically to do this work	
109	<p>Part V. Implementation 5.1.1. Broadband Affordability and Availability Strategy Recommendation: There must be more clarity and stronger methods for broadband accessibility. CAO encourages an asset based approach and resource sharing, but there is a lack of detail about how to achieve this. A lot of the language was not clear, particularly strategies about how to increase ISP choice. Many broadband providers are being funded on the government level, but not at the grassroots level. Broadband providers that work at the grassroots level have an understanding of the needs of the covered populations, many of whom are at the intersection of multiple categories. Broadband funding should go to those local organizations as well. Digital equity working groups should also be created and funded by the ConnectAll office to ensure that there is constant feedback about community needs. 5.1.2. Accessible Device & Device Support Strategy Recommendation: The plan aims to decrease the number of New Yorkers reporting challenges maintaining & troubleshooting their own devices by evaluating the impact of assets whose programming includes inter-generational skill-sharing (e.g., youth supporting aging individuals with technology challenges) and expand successful programs. Several NYCADE members have existing digital literacy models that promote intergenerational learning and troubleshooting within the covered populations. Make the Road New York's approach to intergenerational skill sharing has been very effective. The organization makes efforts to recruit CUNY interns and young adult volunteers to host digital literacy workshops and classes. This ensures that students have culturally relevant instruction and the model strengthens intra community relations across</p>	Comment reviewed and considered; automatic reply sent to commenter.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>generations. At the NYC Department of the aging, inviting "little helpers" from a partner high school to assist during adult ESOL classes has been very successful. This partnership supplemented the classroom learning style and the volunteers offered technical support sessions outside of the classroom. These models were specifically tailored to meet the needs of different covered populations, and were successful in strengthening community ties. Programs like these are examples of what is possible and should be replicated across the state using CAO funding. 5.1.3 Digital Literacy Strategy Recommendation: One of the strategies for closing the digital literacy gap listed in the NYSDEP involves funding the expansion and replication of the highest-performing digital literacy building job training programs. However, this seems impossible unless digital literacy standards are established to determine what a high performing digital literacy looks like. If digital literacy standards are to be created, they must be done with state support, but without state intervention. These standards must be flexible enough to meet the needs of different covered populations, including those who are at the intersection of different identities. Most importantly. These standards must be created with input from community based institutions and practitioners. Spaces/ working groups must be created where CBO's, libraries, and practitioners are directly involved in outreach and have the chance to share their own experiences with teaching digital literacy. For this to happen, there needs to be an increase in the capacity of CBO's who are equipped to do this work. When creating standards, it is also vital to take qualitative data into account when measuring performance. Quantitative results are typically uplifted when assessing student success, but personal anecdotes and feedback forms are equally insightful. Providers must also focus on taking their clients' interests into account when creating programming. Students must learn soft skills, which is also necessary to fully integrate digital literacy skills into their daily and professional lives. These skills are difficult to evaluate</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>on paper through assessment numbers, but they are equally important when evaluating student success.</p> <p>5.1.5. Accessibility of Government Services Recommendation: New York state relies heavily on automated translations on their government websites, which are often riddled with inaccuracies. CBO's then have to invest a lot of time and money into correcting errors for their clients. It would be beneficial for the CAO to involve CBO's in reviewing translated materials since they have the language and technological capacities to assist in the creation and execution of digital literacy standards, and the execution of the NYSDEP overall. For this to happen, there needs to be an increase in the capacity of CBO's who are equipped to do this work.</p>	
110	<p>4.3. Regional Engagement and Participatory Planning Recommendation: Digital Equity Coalitions are vital to implementing the work laid out in the digital equity plan. Funds must be created to support their work and ample time must be provided for data collection and to perform outreach to serve the goals of the ConnectAll Office. The work of digital equity coalitions must be recognized in the plan since their work was integral to the data collection process</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
111	<p>First, these comments address the importance of the internet to so many New Yorkers with disabilities. It is through the internet that New Yorkers with disabilities will have greater capability to engage in civic, educational, financial, health, social, entertainment, and governmental programs, services and activities as well as in employment opportunities. Second, these comments discuss how the lack of effective communication concerning the outreach to New Yorkers with disabilities and the limited scope of the outreach itself has influenced the content of the Five-Year Action Plan, Broadband Equity, Access, and Deployment (BEAD) Program and Volume I and Volume II and their Appendices as well as the Draft State Digital Equity Plan. Third, these comments highlight and discuss some of the parts of these</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	documents that Downstate New York ADAPT agrees with either totally or in part. Further, Downstate New York ADAPT agrees with the comments, dated December 5th, 2023, submitted by Marc Safman. Finally, Downstate New York ADAPT recommends that the Empire State Development ConnectAll Office speak with and listen to a larger cross-section of New Yorkers with disabilities so that these documents and the programs, services and activities implemented pursuant to these documents provide full access to the internet to New Yorkers, including New Yorkers with all disabilities. See comments submitted by email	
112	One-time funding doesn't sustain programs. The Governor, Senate, and Assembly need to understand that funding for the organizations and groups that are doing this work needs to become a critical and consistent part of the New York State budget. These organizations do more with less every year, but at a certain point it's not sustainable. These organizations are asked every year to do more with less funding and support to sustain them. - ConnectALL needs to understand and acknowledge that digital literacy education occurs outside of the schools and outside of school funding. There are other community organizations providing education services. This needs to be reflected in the language throughout the plan (e.g., replace "educator" with "trainer").	Comment reviewed and considered; automatic reply sent to commenter.
113	Please provide guidance on how/when additional resources can be added to the digital equity asset inventory. - Indicate breakdown of survey responses by online or hard-copy. If survey is mostly online, numbers will be heavily skewed. - How was the survey data and the information collected? If it was collected over the internet, and they don't have access to internet, then is the data correct? - Digital literacy -- confidence levels in different activities seem high. Possibly an artifact of online surveys? - Fiber is future proof. Fixed wireless is more expensive and time-consuming to upgrade. We want to see the money spent right and do	Comment reviewed and considered; automatic reply sent to commenter.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>it right the first time and one time. - Even if people are using cellular data plans as their primary access (27% in Western NY), rural areas still have many dead zones. Having a data plan isn't the same as having consistent and reliable internet. - The cheaper cell phone plans are the ones with worse coverage, but these are often the only ones that are affordable. - Many of the places in which you can't get wired-based internet service, you also don't get good cell phone connectivity. - Curious about what the "other devices" are that people using to access the internet. - Surprised at number of people expressing confidence with online banking, health and medical information. Many people come in to libraries who don't know how to do these things. - Survey data are limited because people don't know what they don't know. - Concerned that the lowest confidence level listed for digital literacy is protecting privacy. - Concerned that lowest percentage on public resources graph is applying for internet subsidies. - Data are definitely telling us that people need a lot of help when it comes to getting access to those internet subsidies. - Digital Literacy and Public Resources graphs don't show scale clearly. Visuals can be misleading because bars that span the graph aren't at 100%. Need to make scale clearer. - REDC maps might be useful for the planning purposes, but other maps regional maps could be more helpful with implementation. Consider looking at library and tourism maps, as they're "closer to the ground" than REDC maps. - Clarify when data use individuals as the unit of analysis and when households are the unit of analysis. - Surprised that digital literacy survey did not include work-from-home/remote work skills.</p>	
114	<p>Disparities in broadband coverage in rural areas are disproportionately worse than indicated in the overall regional snapshot. Lack of access to high-speed broadband is not evenly distributed across these five counties. - It was odd that the median household bundle under the monthly service costs \$90 a month while the unbundled costs \$75. I would have expected it</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>to be reversed because usually when you bundle you get a lower price. So, does that mean the people that bundle always just have more money so they buy a higher plan and that's the upsell part of it? - Unbundled plans are "only" \$75. "Only?" Well, \$75 is a lot for some households. - The \$75 price point for unbundled broadband is not affordable for many people living in rural communities. - How solid are the internet service cost figures? Many people answering the survey probably guessed or estimated what their internet service cost is. - Surprised that 48% of the households are enrolled in ACP. Seems high. - What happens when funding for ACP runs out? How many people are just going to turn off their internet and not get it back again after even a very short time without it? - The Universal Service Fund and the ACP need to be bundled together. Maybe the benefit can be set up in tiers. Maybe prorate the benefit depending on income. This could spread that money out a little bit more. - After decades working on digital inclusion, we know that availability is only half of the problem. Affordability is the other half or maybe more. If we build it but people can't afford it, what good is it? - Broadband is not a luxury anymore; it's a needed utility like electricity and heat and water and phone. People that need the services the most and need the access are not getting services and applying for them because it's too difficult. - ACP enrollment is difficult; there are barriers to entry besides not having the ability to go into online and fill out the forms. Not every elderly person has a daughter or a child or a family member that can help advocate and navigate, so those barriers to entry are huge. - Surprised about the number of 20% of low-income households and 14% of rural households lack broadband internet. Locally, that seems low. - Why are only 48% of ACP eligible households enrolled? Is it that they don't have that access because they don't have high speed broadband or they're not eligible because they don't have that access? - Are there targets? Are these objectives associated with actual targets or targets at a certain point in time in the</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>future as opposed to just we want to improve these objectives? - The objective indicates that the focus is on increasing the number of households with broadband access, but it really it's low income and rural households that need the access. There's no objective specifically around increasing rural or low households. The objective could be reached by increasing the total number of households without touching low income and rural people if it's not specified. - It seems like affordable is like one word and that and I think it's 50% of the problem. So that'd be the only thing. I don't know if there's enough focus on that and maybe it's just because it only takes one word to describe it. - The measurable objectives focus more on availability than affordability. Affordability is half or more of the problem.</p>	
115	<p>Section 3.1 Asset Inventory Page 34: The Technology Advocacy Group at NYU Langone would like to request for the following organizations to be added to the Asset Inventory: <ul style="list-style-type: none"> â€¢ NYU Langone Health https://nyulangone.org/ â€¢ Family Health Centers at NYU Langone https://nyulangone.org/care-services/family-health-centers-at-nyu-langone â€¢ Together Growing Strong at NYU Langone https://med.nyu.edu/departments-institutes/population-health/divisions-sections-centers/health-behavior/together-growing-strong â€¢ Fifth Avenue Committee https://fifthave.org/ â€¢ Sunset Spark https://www.sunsetspark.org/ â€¢ P.S.94 The Henry Longfellow School https://ps94brooklyn.org/ </p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
116	<p>Section 5.1 Implementation Strategy & Key Activities Page 125 <ul style="list-style-type: none"> â€¢ This focuses on rural areas, when there are also urban areas that have lower rates of access. We want to ensure the Digital Equity Plan acknowledges that communities also face inequitable access to broadband internet connection within urban areas. Page 128 <ul style="list-style-type: none"> â€¢ We don't believe the issue is not being aware. The system is too complicated, and that deters people from applying and utilizing the subsidy. This is not reflected in the activities as the activities </p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>focus on awareness. ¶ Expanded language access is needed in the application itself, not only outreach efforts. While there are documents about the ACP in multiple languages, the application is only available in English and Spanish. ¶ We support the need for ISPs to better compliment ACP subsidies as we have seen a sharp drop-off rate between the number of our community members who sign up for the ACP and the number who successfully use their code with an ISP. ¶ We are concerned about the ACP funding running out in April 2024. We request that a plan is put in place to continue offering free broadband internet to ACP families and those eligible if/when the ACP funding runs out. ¶ We believe there is an urgent need to ensure low-cost or free-of-cost broadband internet is provided to low-income New Yorkers even if/when the ACP subsidy is not available. This could be through codified partnerships between NYS and the ISPs. We believe programs must be sustainable and easily accessible for participants. Page 129 ¶ The Fifth Avenue Committee saw success with giving households hotspots so they could connect their own devices. Has this technology been discussed or explored? ¶ The Fifth Avenue Committee also saw success with programs that distribute Chromebooks for no cost to participants. ¶ Based on the success of these programs, we propose incentivizing signing up for the ACP with the inclusion of a Chromebook at no cost to participants. The Chromebook unlocks potential that can only be accessed from home internet connection, not only mobile connectivity. Having device ownership enables a much deeper and sustained level of digital literacy. Page 131 ¶ We agree with the need to fund existing programs that provide technical support to New Yorkers including programs that meet people where they are, such as in schools, libraries, and bodegas, and provide services in multiple languages. Sunset Spark provided these services in 2021 and 2022. The need for technical support and guidance far outweighed what they were able to provide. Funding these existing community programs is paramount. ¶ Technical</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>support needs often overlap with digital literacy so both issues should be addressed through programming. Page 133 ¶ The activities are very job-focused while digital literacy is important to address many other social determinants of health. We would like the Plan to include activities to develop digital literacy for healthcare, education, and social service needs. ¶ Community members need support to engage with their children's school, sign up for social services, and use telemedicine platforms. Social needs, keeping in touch with family and friends in other countries, play an important role in addressing social isolation and potential mental health issues. ¶ These skills fall in the overlap of digital literacy and technical support. This also could be addressed under the tech assistance part on page 131, but that is focused on offering technical support/repairs, when some people need help starting out. Page 134: Rural and aging New Yorkers distrust telehealth services that could improve their health outcomes. ¶ We support funding digital literacy programs that increase utilization of telehealth services among vulnerable populations. ¶ We believe mistrust is not the only barrier that vulnerable populations face when using telehealth services. We support activities to address all barriers to using telemedicine platforms including digital literacy and comfort using these platforms, access to devices that have strong internet connectivity and video capability, and language barriers. Page 137 ¶ Language accessibility should be addressed as part of inconsistent accessibility standards for government resources online. Page 138 ¶ This data does not match our experience. Even people with access to devices and internet, and who want to apply, can get very lost on government websites. The applications are very confusing and challenging to navigate ¶ especially in another language.</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
117	<p>The State should incentivize building of cell towers and mandate that service providers cant increase prices, because not funding the infrastructure build-out. Infrastructure build-out is the best use of one-time funding, since programs that are funded through this will come back for more money in the future, but there's no money there. Building physical infrastructure that actually provides the service is a good one-time investment. There would need to be something that prevents the service providers from increasing prices on the backs of a public infrastructure investment. - Getting more ISPs into an area is a laudable goal, but will they be building out new infrastructure or leasing existing? If it's leasing existing infrastructure, is that really competition? Are we bringing in a new top-tier provider, or are we going to have another dozen poor-quality providers? - Universal availability needs to come before competition. Everyone needs to have access before we can start trying to pit ISPs against one another. - ACP enrollment needs to be as simple as checking a box on your tax return and automatically qualifying if you meet income requirements. The current application process is very long and cumbersome. - It would be useful to look at the history of how electricity became regarded as an essential utility. A similar process could be used to ensure universal broadband access. - The process to do that is to reach these people and tell them about these programs is the internet. I guess you run ads on local public channels or something. Or on free TV network or 24/7. Or mailers to homes or billboards. - Remove intimidation barriers that people may have. Like, well, I don't want a computer. Some of these people are going to be reluctant. So how do you reach them? I don't know if you can. - But certainly the people that are having these problems due to financial difficulties in their homes. Yeah, you got to find a way to do it. Maybe through the schools or other means. Sure. Yeah, and you were talking about the accessible, availability, and affordability pieces. - It's something</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>that we'll grow out of, unfortunately. Older people as they pass away, unfortunately. They're the digital lack of digital abilities and stuff like that. And that's going to go over time. In the meantime, obviously you want to reach those populations that you can and help them somewhat. But that problem will eventually solve itself. - I think the Universal Service Fund model is the right approach in my opinion. I think it's a universal approach that worked so well for telephone service for a hundred years or wherever it's had, would be the right approach would work again to do that. It's proven and it's equitable fair and equitable. So if we can do something like that to do that, like I say, back again to affordability being half the problem there. - Unless you live in one of the main towns in rural county, you don't have accessibility to internet services. And some of the areas, they have cable home internet. They apply for the affordable connectivity program, but because they don't have Fios or high speed internet, they can't get it applied to their account, even though they qualify in all the other areas. So just something else to be aware of. - There are no activities connected to increasing the number of ISPs within a region. What activities are going to promote that competition? - Outreach efforts need to include activities to ensure that the public knows that libraries are a place to get internet access and assistance. - ACP cannot be applied to satellite internet or copper line, like phone internet. It only can be applied to high speed cable internet or FiOS. We have a lot of people locally with satellite internet that went through the entire process and then they find out at the very end after all that work that they weren't qualified for ACP because of their connection type.</p>	
118	<p>The principles outlined in Section 4.1.1 of the Draft Broadband Deployment Initial Proposal Volume 2 states that open access will be "Scoring criteria that reward open access and enhance broadband competition and mobile deployment". Additionally in section 4.2, the scoring rubric awards 14 points to "Open Access" networks. This specifically puts public private</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>partnerships at a disadvantage and promotes a model that has not shown increased competition in any of the examples of open access deployment. Below we provide specific examples of these deployments and detail the service from which the customers have to choose. We request that the points available to open access networks also be awarded to projects that have local government participation, either through open access model, municipal ISP model or the public private partnership. Rewarding public participation ensures low-cost service and availability as their participation contributes to the requirements of the ISP. The following is a list of Recommendations the CAO consider:</p> <ol style="list-style-type: none"> 1. Amend the 15 points given for Open Access in the Scoring Rubric to include "Local Government Participation/Partnership". This will increase participation by all providers and allow Counties to continue to implement their successful broadband development strategies. 2. Address issues identified with Open Access to ensure funds are directed to less risky projects that have a documented history of success. Some of the identified issues that should be addressed are as follows: <ol style="list-style-type: none"> 1. How will these networks create competition organically without intervention? Current Open Access Networks in New York State do not demonstrate seem to demonstrate significant competition. 2. Limit special projects to maximize unserved and underserved. We have one shot at this and if prior work is leveraged, NY State can do this with funds provided. 3. How will organizations like STN and DANC support last mile connections across the state? 4. Require a similar financial Proforma for open access to show financial feasibility post funding. 5. Shift focus from open access to prioritizing fiber optic service as a technology, with service provided at the lowest price possible. If the CAO requires \$50 base service for 250 symmetrical service, all private providers listed in these comments would be happy to accommodate. Public, Private Partnerships have been awarded over \$40M from the USDA in Livingston, Yates County and Madison County, 	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>showing the Public Private Partnership model to be the most successful expansion of broadband in the last 5 years.</p>	
<p>119</p>	<p>The following reasons were provided by the CAO as reasoning for incorporating Open Access networks into its Core Principles: Competition Openness Fairness The CAO indicates that this will result in better, lower cost service through competition however looking at the in-state and out of state examples shows little effect on competition. Examples of Open Access Networks in NY State: Below are the two examples of Open Access networks in New York State. The following is a summary of the providers using their network: 1.Nichols Fiber “ Southern Tier Network owned and operated. A \$30 base fee is charged to all subscribers from STN, then a fee from an ISP is added. The ISP only provides internet and STN is responsible for all physical infrastructure. As of this comment, only one ISP (Fiber Spark) is offering service on the network. The base level service offering for \$40 total is 100/20 Mbps. Source: https://southerntiernetwork.org/nicholsfiber/ 2.Sherburne Electric “ The Village of Sherburne Electric owns and operates this open access network. A \$30 base fee is charged by the Village plus an ISP costs. The ISP only provides internet and Sherburne is responsible for all physical infrastructure. As of these comments, only two ISP are offering service on the network and base level services are only 100/100 Mbps. Source: https://www.sherburnefiber.com/ Examples of Open Access Networks Out of State: 1. Utopia Fiber “ Utopia is the most commonly used example of an Open Access non-profit network. On the network are 15 internet providers, however they all have almost identical pricing. If you refer to their website listed below, competition has only yielded \$65 per month for</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>250 Mbps as the lowest level of service. This is \$15 over the CAO target for cost for ISP service, supplying only half of the speed. Utopia has been in service since 2004. https://www.utopiafiber.com/residential-pricing/ Examples of Private Fiber Providers in State: ISP's who implement all fiber networks in New York State, specifically what is referred to as an XGS-PON, the costs are often at or below the targeted \$65 per month.</p> <ul style="list-style-type: none"> • Greenlight Base Residential Package is \$50 for 500/500 Mbps • Empire Access Base Residential Package is \$50 for 500/50 Mbps • DFT - Base Residential Package is \$65 for 100/100 Mbps • OTTC - Base Residential Package is \$64 for 250/250 Mbps • SLIC - Base Residential Package is \$71 for 50/50 Mbps* • Windstream Kinetic - Base Residential Package is \$40 for 500/500 Mbps • Haefele Connect - Base Residential Package is \$57 for 200/200 Mbps • GoNetSpeed - Base Residential Package is \$55 for 300/300 Mbps <p>Service Cost Comparison: Sherburne - 20% of the bandwidth for \$40 when compared to local providers. \$10 more expensive for 100/100 which is still 20% of most providers. https://www.sherburnefiber.com/ Nichol - 20% of the bandwidth for \$40 when compared to local providers. \$10 more expensive for 100/100 which is still 20% of most providers. https://southerntiernetwork.org/nicholsfiber/ Utopia Base Residential Package is \$50 for 50% of the bandwidth for 20% more per month. Source: https://www.utopiafiber.com/residential-pricing/ Open Access has the potential to promote competition but does not reduce the cost of internet without intervention. Project Cost Comparison There are some specific design differences needed for open access vs Passive Optical Networks (PON), technology used by private providers. The differences relate to point-to-point (P2P) connections vs point-to-multiple point (P2MP). According to Broadband Technology Report, in 2021, 54% of service providers selected P2MP (XGS-PON specifically) compared to 25% who selected P2P networks. Source: https://www.broadbandtechreport.com/fiber/ftth/article/1</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>4214354/operators-plan-big-10g-pon-deployments-in-next-two-years</p> <p>â€¢ P2P vs PON - Point to Point or P2P, required for open access fiber networks requires one fiber to serve one home. PON networks allow one fiber to serve up to 128 homes using different light wavelengths rather than fiber. It requires a fraction of the equipment locations required by Point-to-Point networks thus decreasing points of failure. Additionally, P2P networks require extremely high fiber counts which increase splicing costs and lengthens repair time. For example, a 288-fiber cable that is required to serve 288 subscribers in an open access, P2P network. A Point to Multipoint (P2MP) would require only 5% of the fibers required by P2P, reducing both Capital and Operational expenditures for fiber splicing by 95%. It also reduces the number of cabinets required by 75%, further lowering Capital Expenditures and Operational Expenditures.</p> <p>â€¢ Open Access Models requires the local municipal entity to maintain all of the following:</p> <ul style="list-style-type: none"> o The fiber optic cable o Cabinets full of equipment o Customer Service <p>All of these issues would be the responsibility of the open access network, not any of the providers.</p>	
120	<p>The database for Community Anchor Institution-community support organizations needs to be expanded to include local grassroots organizations beyond Department databases. There should be more clarity on how the public community process can be utilized to ensure that all relevant local organizations meeting the CAI criteria are included.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
121	<p>Lots of programs are being funded at the government department level, but not at the grassroots level who have an idea about the needs and the intersectionality of the covered populations. There should be local digital equity working groups on the ground that are supported by CAO. Local Digital Equity working groups can focus on providing critical services (such as broadband access) to underserved communities. Local Digital Equity working groups should be consulted to provide a</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	voice in adjusting the benchmarks and assisting in the evaluation in the top underserved communities	
122	<p>ConnectAll should support the unbundling of broadband services and video packages that typically keep the prices of internet too high for unserved and underserved households to afford and access. Broadband-only providers should be introduced in areas where only bundled services are available. ConnectAll should standardize the ease of access to internet and promote building wide internet similar to utility in new and renovated buildings. ConnectAll should encourage the last mile installation of internet to the extent possible where residents enjoy readily available internet without extra effort. ConnectAll should actively increase competition and support every location to have at least three ISP options. One of the options can be municipal broadband. ConnectAll should support Municipal broadband and its partners. A city or a county during election years should not be able to walk back on previous commitment to internet master plan. Local internet initiatives should be protected by local council and legislations. There should be more MWBE representations in the internet service providers companies. Streamline and remove roadblocks in the procurement process that are onerous and financially infeasible for small MWBE companies. ConnectAll should discourage and withhold funding from additional public funded initiatives that create monopoly similar to Big Apple Connect. Subgrantee agreements should build in protection against monopoly and increase open access & competition. There must be more clarity and stronger methods for broadband accessibility. CAO encourages an asset based approach and resource sharing, but there was a lack of concrete evidence about what the approach is. ConnectAll office should take stronger measures than "encourage specialized</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>equipment sharing" for smaller ISPS to reduce costs. ConnectAll can require prospective subgrantees to commit to a standardized open access agreement instead of relying on individual smaller ISPs to negotiate resource sharing agreements with bigger providers who are not incentivized to share. ConnectAll office should take stronger measures to promote leveraging underutilized dark fiber, conduits (and other existing infrastructure) owned by municipalities and incumbents to reduce costs and barriers to deployment. Quantitative results are typically utilized, but qualitative data and testimonials are important to gather as well. We want to take people's individual interests into account when creating programming. We want our students to learn soft skills as well, which is also necessary for fully integrating digital literacy skills. These are difficult to evaluate on paper or through standard assessment numbers, but they are equally important when evaluating student success.</p>	
123	<p>Of the 5 outcome areas listed in 1.1, p. 1210, it will be important to balance funding to support all 5 rather than focusing only on the economic and workforce development that is the interest of corporate stakeholders. Chapter 1, p. 11 "CAO's strategy considers the limitations of its resources and is driven by the need to identify multipliers that can amplify and sustain past, present, and future investments." We recommend explicitly including criteria to clarify what makes an organization or initiative a "multiplier" (and NYSDEN has already suggested helpful criteria for this evaluation). We appreciate the focus on collaboration and capacity-building in the 4 strategic pillars from section 1.2, and are eager to see how funding will support the labor of community members and other stakeholders to participate in the planning and implementation process. It is important to note the challenges to "center the experience and expertise of covered populations" (p. 12) and the importance of</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	providing compensation or other incentives for members of covered populations to participate actively.	
124	<p>Of the funding allocations in section 2.1, it will be important to provide pathways for small organizations to receive funding, perhaps through partnership with larger organizations, since they may not have the capacity for grant writing or for funding work while waiting for reimbursement. Where "Choice" is included as one of the 5 digital equity principles in 2.2, a persistent omission in all of these plans / discussions is the fact that some New Yorkers choose NOT to be online, and have good reasons for doing so. Their choices also need to be respected, with services still provided in traditional non-digital ways (in-person, mail, phone) and/or the ability of trusted Digital Navigators to assist them or even do tasks for them using online services through Community Anchor Institutions. We appreciate the acknowledgement in section 2.3, p. 19 and elsewhere of the role that public libraries have played in bridging the digital divide. While libraries have struggled with severe budget cuts with a negative impact on their existing library digital equity programs, state funding targeted for digital equity will help to maintain and to expand these programs. (I don't see anything about public libraries on page 17? â€“ KW) The recommendation under 2.3.2 to "Shift digital inclusion efforts from building-restricted Wi-Fi and device loaning to household internet and device ownership" (p. 19) does not feel realistic based on our community interactions and their concerns about affordability. This should not be an "either/or" and a "shift" but rather an "and" and a supplement. Community members will continue to need access to the internet, devices, and support in convenient and comfortable community locations, at convenient hours For "peer-led digital literacy training programs" (2.3.3) to work, it will be</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>important to provide competitive compensation for the peer leaders. The "funding for accessible information and plain language training" in 2.3.5 will be beneficial not only for people with identified developmental disabilities, but for all New Yorkers As the important role of Digital Equity Coalitions is acknowledged in 2.4.1, it is important to note that across the state different coalitions are in different stages of maturity and those who are still "young" like the STDEC will particularly need capacity building support to participate in the CAO SDEP timeline. The asset-based strategy in 2.4.1, and the focus on supporting existing assets vs. creating new assets fits well with the Southern Tier's needs assessment and asset inventory process, as we noted valuable programs that need to be supported, replicated, and better marketed. The participatory budgeting approach in 2.4.1 could help greatly to support the collaborative aspects throughout the rest of the plan. Under the Alignment and Awareness strategy in 2.4.1, it is important to note that many people don't understand the phrase "digital equity" and it is more helpful to note the more specific NTIA measurable outcomes or specific programs and services like those listed in Appendix 1.2.3 New York Community Anchor Institution Survey in Section 2, question 1. This more specific language helps greatly in "cataloguing unconventional programs and services under a digital equity umbrella" (p. 27). In 2.4.1 one method mentioned is "Releasing data CAO collects publicly as mechanism for transparency and accountability, supporting Strategies 2 and 3 by allowing communities to independently understand and act on the data, respectively" (p. 28). We have asked for data from the New York State Internet Access Survey from Southern Tier respondents, but it has not yet been made available to us. We are eager to have this data to do our own more granular analysis for our region, to guide future planning. We are also concerned that it says in Appendix 1.2.1 that "Data from this survey will be retained for one year following the approval of the State's Digital Equity Plan, then destroyed" and hope</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>that data relevant to the individual regions will be shared well before that, and regions will be provided with guidance about any limitations on use of the data. We would like to see more in Chapter 2 to address the findings in our needs assessment that many community members in the Southern Tier would like to see broadband treated as a public utility so that there is better accountability of internet service providers. There are several quotes from community members in the plan that touch on this issue, but nothing in the proposed strategies or measurable objectives.</p>	
125	<p>As mentioned for Chapter 2, sharing of data from the New York State Internet Access Survey from Southern Tier respondents will help greatly with regional planning: for example the speed test data mentioned under 3.2 on page 48 would help with challenges to the broadband map. The attention to intersectionality in 3.2.1 (p.55, and in Table 20, p. 155) is greatly appreciated, as we found that the format of the CAO regional needs assessment limited our ability to address this factor. The highlighted intersections for each covered population can help greatly with program planning to keep complex user needs in mind. Can more information be shared about the design of the New York State Internet Access Survey instrument? We would appreciate knowing how the options for certain questions were chosen, such as the activity options under "Digital Confidence" (p. 94, Q21 in Appendix 1.2.1) or options in Q2 and Q26, especially if they are based on any past instruments / research. Similarly, we wonder about how the list in Section 2, Question 1 of the New York Community Anchor Institution Survey was determined, as we independently came up with a similar list for our own asset inventory process, and would like to match with other instruments/research if possible. Is it true that the New York State Internet Access Survey was limited to 1 response per household, as shown in Appendix 1.2.1 (p. 57)? If so, this is a serious limitation on the data, not acknowledging different covered populations in each household, and their different perspectives. While</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>STDEC members put in significant work to make it possible for survey participants to fill in a paper form if they did not have online access or comfort, the statewide results show that 98% of surveys were completed online (under 7.2 Survey Data Analysis Methodology, p. 151). This is concerning, showing how the digital divide makes it even more difficult to reach those most affected by it. This bias in the survey results needs to be made even more clear, and points to the need for significant resources for marketing both surveys and programs to those most affected by a lack of digital equity.</p>	
126	<p>The "regional approach to stakeholder engagement" in 4.3 will be important to sustain moving forward. The CAO's regional needs assessment and asset inventory process was an important step for the STDEC. However, for every organization we were able to reach and add to the state's database, at least as many did not get back to us in time for this project, that could be valuable connections. Undoubtedly many more remain to be identified, but this networking cannot continue without further funding, including incentives for community organizations to participate. We would like to know more about the Community Anchor Institutions mentioned in 4.2.4, to help with our regional planning for the Southern Tier. We would appreciate access to the data from the New York Community Anchor Institution Survey (Appendix 1.2.3) for the Southern Tier. We are concerned that if this survey was only shared with those who attended CAO's June 27th Virtual Forum, there are likely many CAIs in the Southern Tier that are not represented, and we want to help them to be recognized on the map and in the CAO planning.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
127	<p>In some cases the Identified Need and Key Activities note a focus on covered populations, but covered populations are not specifically addressed in the Measurable Objective or Proposed Impact Metrics - will more granular objectives be added related to their specific needs? The measurable objective in 5.1.1.D is</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>not enough, based on our communication across the Southern Tier. While increasing "awareness and adoption of internet affordability programs" will help, we identified that even with the ACP, internet is still not affordable for many households in the Southern Tier, or not reliable enough to be worth the cost. For 5.1.2.C, where "virtual/video/screenshare technical support" is mentioned, phone based support can also reach people who can't come in person, without necessarily needing an internet connection or having remote communication tools already set up. Also some may prefer print guides with step-by-step instructions, screenshots, etc. Based on our communication with organizations who work with the aging, these methods may be preferable. It would be much more impactful to have an additional measurable objective to increase the variety of internet affordability programs, encouraging innovative alternatives to the ACP and Lifeline programs. For 5.1.3.C, "industry-desired credentials" will be important, but should not be the only valued standards for digital literacy curricula. Given that workforce training is only 1 of 5 outcome areas identified in the SDEP (1.1, p. 12), standards related to education, health, civic and social engagement, and navigation of public resources should also be included. 5.1.4.A is not enough, based on our communication across the Southern Tier. First, it would be more impactful to increase the number of New Yorkers receiving Privacy & Cybersecurity training rather than increasing the number of assets providing Privacy & Cybersecurity training to New Yorkers (a few high quality assets could reach a large population with a strong training program). Second, the burden for this should not just be on individuals/consumers, but also on the government, corporations, and organizations, to develop innovative approaches to make login and authorization procedures more consistent and user-friendly. Where 5.1.5.A includes "universal accessibility standards" it is important to acknowledge the differences between accessibility, usability, and inclusivity, and the need for all 3 in the design of public resources such as government websites Considering</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>the high figures for smartphone and tablet use in the survey data, and discussed in our community interactions, it will be important for public resources to use mobile-first or responsive design strategies. Where 5.1.5.B is focused to "Develop outreach campaigns to increase covered populations' trust in online government services," there is no mention of actually making online government services more trustworthy. If this is expected to be addressed in 5.1.5.A, that connection should be articulated better to make it more explicit.</p>	
128	<p>Chapter 1: Executive Summary 5 outcome areas listed in 1.1 (p.10): Make sure there is a balance of focus, not just on the interests of corporate stakeholders. Section 1.2 (p.12): Need more detail about HOW you will "center the experience and expertise of covered populations." Section 1.4 (p.14): Overwhelming majority of survey responses were completed online failing to capture adequately the voices of those who do not have access or skills to respond online. Take care not to believe you have a fully representative sample from which to draw conclusions. Section 1.5 (p.15): Critical 6th objective is missing -- on-going support for all of the above. Throwing one-time funds and efforts at this issue does NOT sustainably solve the digital divide. Section 2.1 (p.18): Be sure to facilitate ways for smaller organizations without the capacity for grant-writing to receive assistance as well. Section 2.2 (p.19): Some New Yorkers choose NOT to be online for their own good reasons. Their choices also need to be respected, with services still provided in traditional non-digital ways or better -- provide for trusted "Digital Navigators" to assist them or even do tasks for them when they need online services. Section 2.3.2 (p.21): Instead of SHIFTING digital inclusion efforts, SUPPLEMENT digital inclusion efforts. Section 2.3.3 (p.22): Provide financial incentives to recruit peers for the peer-led training. Section 2.3.5 (p.24): "Plain language" is for everyone, not just those with accessibility issues. Section 2.4.1 (p.26): Participatory budgeting would be more inclusive! Section 2.4.1 (p.26): Public libraries</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>need MORE funding not less if they are to be able to support these initiatives. Section 2.4.1 (p.26): Please keep in mind that not all regional coalitions are at the same stage of development; it's been a major struggle to meet the State's aggressive timeline before we even have by-laws or basic infrastructure. Section 2.4.4 (p.28): Be sure to share data with regional coalition partners. Section 2 (p.17-32): Address the findings in our needs assessment that many community members in the Southern Tier would like to see broadband treated as a public utility so that there is better accountability of internet service providers. Section 3.1.1.2 (p.37 etc): Libraries need MORE funding to play our critical role in democratizing digital equity. Please be sure to mention this to legislators. Section 3 - in general: We need to reach out to people we missed in the survey and find ways to share information and get feedback that has fewer barriers. The whole structure of this document and feedback mechanism is overwhelming even for an educated, internet-savvy person who has been involved in the process -- you are not likely to get any feedback from those most in need -- the barriers are just too much. Also, please keep in mind folks who choose NOT to access the internet and who could use a trusted navigator to help them when they must interact with the internet to get things done that they need to do. Finally, for this section, averages, like "average income" for a region, can be very misleading. There can be a few (like College Presidents, for example) who make really high incomes dragging up the average living in the same community/region as folks who live hand-to-mouth even with Social Services. Just because there are some wealthy people in an area does not mean the area is wealthy overall. Section 4.2.4 (p.117): We'd like to know more about the "Community Anchors." Section 4.2.5. (p.117) How will we navigate the conflict regarding leadership of the Haudenosaunee folks? A lot of them do not recognize Clifford Halftown, so we need to reach out in other ways than through official channels. Section 5.1.1.D. (p.128) Not enough -- even when people are aware of the programs, the cost is</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>sometimes still too high. Section 5.1.4.A. (p.136). Government agencies need to work harder at earning and deserving trust of their websites, not just telling people that they are "safe." Section 5.1.5.A (p.137) "Universal accessibility standards" must make clear the differences between accessibility, usability, and inclusivity, and that there is a need for all 3 in the design of public resources such as government websites. Section 5.1.5.B. (p.138). Make the sites actually more trustworthy. Section 6 - in general: Lots of great work done with a potential to do great good, but there are gaps and things we still need to work on.</p>	
129	<p>The City of New York (the "City"), through its Office of Technology and Innovation ("OTI"), submits this comment in response to the New York Empire State Development Corporation's ("ESD") ConnectALL Office ("CAO") request for public input to the emerging state-wide digital equity plan. The City appreciates the significant effort undertaken by the CAO team over the last year to secure input from communities and targeted Covered Populations across the State's many counties, including the five boroughs. The City sees valuable alignment between its own broadband and digital equity initiatives and the State's four impact strategies, which when implemented through informed actions, will help to drive accessibility supports and compliance, sustainable device access (including refurbishing), increased awareness of internet affordability options, and improved digital inclusion resources for robust online safety and literacy skills, to name a few. Taken together, these strategies can serve to advance long-held hopes for a more equitable digital New York. One concern, however, is the methodology of the draft plan's representation of where Covered Populations are present across the State; the City believes that CAO's current apportionment of Covered Populations to specific regions will hamper fair distribution of digital equity funds. Specifically, identification of state regions, counties, etc. may not provide an accurate account of that population's distribution across the state's</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>geography, and even less so where Covered Populations may be comprised of intersecting categories that sit at the nexus of long-term structural inequalities, or that may be further compounded by significant urban density. For example, the City currently hosts 42.65% of all State households in its five boroughs with over eight million residents of which 74% are of color, 36% are foreign-born and speak a language other than English, 15% are over the age of 65, 11% identify as people with disabilities, 2% are Veterans, nearly 21% are under the age of 18. In addition, the City operates the largest public school system in the nation, serving the educational needs of 1.1 million K-12 students, every day. Further, cost of living is a significant deterrent to mobility in marginal populations; the City of New York is highly representative of those communities with 23% living in or near poverty. Simply, accounting for the state-wide distribution of affected Covered Populations would provide greater context for the State's proposed allocation of funding and the resulting service delivery improvements. In addition, 30% of City households do not have the combination of home and mobile broadband access that the City considers required to be fully connected. Given that most of the inhabitants residing within the City boundaries with no broadband are deeply reflective of federal funding targets -- 43% are older adults, nearly 42% are people with disabilities, 56% are low-income, and 21% New Yorkers lack a computer at home -- it is less impactful to exclude funding from a region that comprises a significant portion of the overall state population. When these digital divide percentages are placed against the needs of low-income households, the scale of need for Covered Populations in the City should not be underestimated. Although the City continues to take positive strides towards narrowing the digital divide, there is more work to do to scale enrollment in internet subsidy programs, expand public wi-fi at City service centers (i.e., benefit sites, shelters, public computer centers), establish a sustainable device</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>ecosystem, and provide all New Yorkers with high-quality digital skills necessary for safe and full participation. Therefore, it is imperative that the Covered Populations who reside in the City are accurately represented. The City looks forward to continuing its work with the State to ensure the creation of a responsive and comprehensive plan, to propose "fair share" funding, and drive conditions towards genuine digital equity for all the State's residents, including those here in the counties of Kings, Queens, Richmond, Bronx, and New York. The City of New York boasts a tremendous diversity of Covered Populations, each of which, and together, merit equitable access to the potential benefits of this historic investment. Respectfully submitted, City of New York, 12/06/2023 ** Due to limitations of the portal, please note all citations to data and authorities supporting the City's analysis are posted under the Conclusion Section. The full document with proper footnote correlations has also been directly submitted to the ConnectALL Office for consideration.</p>	
130	<p>Please see here all citations for data and authorities for the City of New York's comments posted to Chapter 1: Executive Summary. The full document has been submitted to the ConnectALL Office. ConnectALL Office, New York State Digital Equity Plan DRAFT FOR PUBLIC COMMENT, available at https://broadband.ny.gov/new-york-state-digital-equity-plan (pub. Nov 2023). Under the \$2.75 billion Digital Equity Act, funds are to be distributed to "communities in need of access to affordable, reliable, high-speed Internet" an essential service in an increasingly digital world." See https://broadbandusa.ntia.doc.gov/funding-programs/digital-equity-act-programs/state-digital-equity-planning-grant (accessed Nov. 28, 2023). In addition to local agency input through OTI, CAO conducted over 40 focus groups with Covered Populations, a state- wide Needs Assessment and Asset Inventory that received 5,500 responses, virtual</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>stakeholder forums, and Digital Equity Task Force Town Halls. See https://broadband.ny.gov/connectall-events (accessed Nov. 22, 2023). Strategies are: i) Grounding Investments in an Asset-based Approach; ii) Strengthening Networks to Share Resources & Take Coordinated Action; iii) Building Alignment & Awareness; and iv) Sharpening & Socializing our Digital Equity Lens. See "1.2 Strategies & Approach," New York State Digital Equity Plan DRAFT FOR PUBLIC COMMENT, at 13. For model privacy curriculum in the library context, see NYC Digital Safety at https://nycdigitalsafety.org (accessed Nov. 29, 2023). In addition to challenging the representation of where Covered Populations are generally, the City proposes the application of the "1-year ACS estimates" as appropriate for census tract analysis of localities with populations of 65,000+. This contrasts with ACS aggregation of data over five years as relied on here overall but best applied to populations of approx. 4,000 people. The City seeks to diminish a potentially misleading equivalency between rural and urban Covered Population distributions. See also: John Horrigan, Ph.D., New York's Digital Divide: Examining adoption of internet and computers for the state and its library districts, at www.nysl.nysed.gov/libdev/documents/HorriganReportNY.pdf, (pub. Apr. 2021, at 11). See Federal Communications Commission guidance to States and localities addressing "digital discrimination" in broadband deployment and adoption, and with regard to the grants processes for funds related to broadband infrastructure: Communications Equity and Diversity Council, Recommendations and Best Practices to Prevent Digital Discrimination and Promote Digital Equity, at https://www.fcc.gov/sites/default/files/cedc-digital-discrimination-report-110722.pdf, (Pub. Nov. 7, 2022; at 12-13). ACS 2021 1 Year, American Community Survey, https://www.census.gov/programs-surveys/acs Id. Id. See, generally, https://www.nyc.gov/site/mopd/resources/resources.page. New York City Dept. of Veteran Services, Data</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>About NYC Veterans, https://www.nyc.gov/site/veterans/community/data-about-nyc-veterans.page, (accessed Jul., 2023). ACS 2021 1 Year, American Community Survey, https://www.census.gov/programs-surveys/acs. NYC Dept. of Education, DOE Data at a Glance, https://www.schools.nyc.gov/about-us/reports/doe-data-at-a-glance, (accessed Jul., 2023). Assessed at 100-150% NYC threshold. See New York City Mayor's Office for Economic Opportunity, Poverty Tool, https://www.nyc.gov/site/opportunity/poverty-in-nyc/data-tool.page. As of 2020, the low-income threshold for a family of four in the City due to higher cost of living ratios, is \$36,262 versus the State generally, which is \$26,246. See NYC Mayor's Office for Economic Opportunity, NYC Government Poverty Measure 2020, at https://www.nyc.gov/site/opportunity/poverty-in-nyc/poverty-measure.page (accessed Jul., 2023). ACS 2021 1 Year, American Community Survey, https://www.census.gov/programs-surveys/acs. Id. Id. Id. Id., also, the City also hopes to address this in part with 2023 Local Law 81 that requires the Department of Citywide Administrative Services to "donate surplus city-owned computers to eligible organizations for beneficial use." Rules/procedures pending. See Sect. 1. Ch. 2 of Title 12 of the administrative code of the city of New York, Section 12-214 Donation of surplus computer equipment, at https://codelibrary.amlegal.com/codes/newyorkcity/latest/NYAdmin/0-0-0-202766, (accessed Nov. 29, 2023). As of October 2023, 835,000+ eligible households are enrolled in the Affordable Connectivity Program while OTI's Big Apple Connect initiative offers free access to internet and basic cable TV to more than 330,000 New Yorkers living across 220 NYCHA sites.</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
131	<p>A month is insufficient to solicit and receive input from the public, especially in rural western NY and Southern Tier. I only just heard of the opportunity two days ago and need more time to digest the enormous scope of the plan, and notify others in Allegany County about the opportunity to participate and comment. This is a formal request for an extension of the the deadline for another thirty days. If you really want to put your finger on the pulse of those affected by the digital diivide and solutions that you might have missed, please consider and grant an extension.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
132	<p>Hispanic Federation (HF) appreciates the opportunity to provide comments on the New York State Digital Equity plan. Headquartered in NY, HF is the premier Latino nonprofit membership and advocacy organization the U.S. that seeks to empower and advance the Hispanic community. We hope our comments on NY's digital equity plan help inform the development of the state's final proposal in a manner that truly meets the needs of Latino and low-income populations in New York. For several years, HF has worked closely with Latino community-based organizations teaching essential digital skills to prepare Latinos for the increasingly digital workplace. Our 2022 report Closing the Latino Digital Divide: Lessons Learned from Community-Based Approaches to Latino Digital Skilling, outlines our successful approach to closing the Latino digital divide by supporting trusted community institutions offering culturally and linguistically responsive programming to increase digital skills along with vital wraparound services to meet the needs of their communities. We know that technological advancements are changing the requirements for our workforce and Latino-led and -serving nonprofits engaged in workforce training must respond to the shifting labor market demands to best prepare Latino workers for the digital economy. The federal Digital Equity Act is a historic investment in meeting this demand. The funding that NY is receiving through this legislation will not only help residents get</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>badly needed access to high-speed internet and digital devices, but also equip them with the skills they need to use those tools effectively to achieve their economic aspirations. Equipping people with the digital skills they need for the workplace and in their everyday lives is an integral part of achieving broader digital inclusion goals. Recent research from the National Skills Coalition and the Federal Reserve Bank of Atlanta highlights the demand for digital skills in our state. The Closing the Digital Skill Divide report analyzed millions of Help Wanted ads and found that fully 92% of jobs in NY today require digital skills. These numbers hold true across industries and for workers at every level of education and experience. This research is especially important to highlight as more than half of Latino workers have limited to no digital skills, and 1/4 of Latinos have access to the internet only through smartphones. Latinos make up 18% of the overall U.S. labor market and will continue to account for one out of every two new workers that join the workforce by 2025. However, Latinos also hold jobs that are at the highest risk of elimination due to automation of any identity group at close to 60%. The forecast is clear: without digital skills, Latinos will be disproportionately excluded from jobs that will advance their economic mobility. When looking at broadband connectivity, Latinos face challenges in the digital space. A 2021 Pew Research Center Survey found Latinos compared to White non-Hispanics were far less likely to have home broadband (80% vs. 65%). Reports also found that 35% of households with children ages 6 to 17 and an annual income below \$30,000 a year do not have a high-speed internet connection at home, compared with just 6% of such households earning \$75,000 or more a year. In NY, 1/3 of Latino households do not have wireline broadband at home and similar numbers do not have a desktop or laptop computer. The lack of internet services and resources for Latino communities include the following: 16% of Latinos do not have broadband of any type, 34.1 % do not have wireline broadband, 31.7% do not have a desktop or laptop computer, 43.5%</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>do not have a tablet computer and 1,174,170 of households lack digital access tools. (https://www.nysl.nysed.gov/libdev/documents/HorriganReportNY.pdf). Factors such as low-income help explain why Latinos in NY lack access to the internet. According to a 2022 report from the NYS Office of Budget Policy and Analysis, 20.9% of Latinos are below poverty, double that of our white counterparts who were at 10%, below the state average at 10%. As NYS is aware, community-based organizations are woven into the fiber of the Latino community, and thus, can reduce service barriers by operating within Latino neighborhoods, providing education and training bilingually or in Spanish. These organizations understand community needs and culture and are committed to serving those with the greatest need. These organizations are important digital equity stakeholders that conduct outreach, deliver trainings, and offer digital navigation and technical assistance to expand access to digital opportunities in Latino communities. We urge NYS to collaborate with community-based organizations as they are best placed to connect within the communities which these funds are aimed and can maximize the opportunity to ensure digital equity for all. Thank you again for the opportunity to submit these comments.</p>	
133	<p>We noticed that our organization isn't listed. Most, if not all, of our work, is focused on digital equity. We want to submit a written report on what we think implementation should look like to address public interest in digital literacy. https://bit.ly/482hUZo</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
134	<p>Mention has been made of the pandemic and the need for more web access. However, the best access is through wired connections. For instance, the National Telecommunications Information Administration (NTIA) has prioritized fiber to the premises for the nation in order to bridge the digital divide, not mobile. Lest HHS believes that mobile access will bridge the digital divide, it will not. So, to digress a moment on the benefits of fiber to the premises – Underscoring the importance of</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>fiber over wireless, former FCC Chairman, Tom Wheeler, in his March 2021 Congressional testimony, described fiber as "future proof," and prioritized a "fiber first" policy for the nation. Wheeler's statements point to the fact that wireless and fiber are not equivalent broadband media, and that wireless should be used only as a last resort. "Fiber is unmatched in its speed, performance [and] reliability â€" far exceeding the promise of any generation of wireless technology. Wired connections, such as fiber and cable, to the premises provide the best capacity for remote learning for children and students, particularly those who are already EMS Disabled, and more reliable access to medical and other services for the elderly and disabled during emergencies or severe weather when wireless service is more likely to be interrupted. Wired connections will also prevent the exclusion of the EMS Disabled who cannot be near RF radiation emitted from mobile devices and equipment. The importance of providing accommodation for the EMS Disabled for medical programs and services is two-fold. First, exposure to RF / EMR / EMF / MW radiation in medical facilities can be life-threatening. Second, a "patient's vital signs or test results may vary dependent on EMF/EMR exposures at a specific location and at a specific moment (electrosmog can affect the autonomic nervous system, the blood, the heart and even blood sugar levels in some sensitive diabetics) . . . this can lead to misdiagnosis, over-treatment, under-treatment, inappropriate medications or dosages . . ." Further reasons and a detailed list of recommendations for accommodation are provided by the ElectroSensitive Society as set forth in Appendix A, incorporated herein by reference. The Society refers to EHS â€" electrohypersensitivity â€" another term for EMS. Those suffering injuries from exposure to radio frequency (RF) radiation are known as having electromagnetic sensitivity (EMS), also referred to as radiation poisoning or microwave sickness. Hence, those with ensuing disabilities are referred to as "EMS Disabled." Their disabilities give rise to "impairment[s]</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>that substantially limit[] one or more major life activities" under the ADA. The EMS Disabled require equal access to web services in a manner that does not injure them and that does not otherwise put them in harm's way. They cannot use a technology that is injuring them. What is emitted from wireless devices and facilities is commonly referred to as radio frequency (RF) radiation, electro-magnetic radiation (EMR), electro-magnetic fields (EMF), microwave radiation or wireless radiation. It is the persistent pulsations of RF radiation that cause adverse health outcomes and ensuing disabilities. It is the pulsed high peak power emissions that, for example, increase the potential for traumatic brain injury and consequent cognitive impairments. EMS disabilities encompass a constellation of symptoms which can include: sleep disturbances, chronic fatigue, chronic pain, poor short-term memory, difficulty concentrating (e.g., "brain fog"), skin problems, dizziness, loss of appetite, heart palpitations, tremors, vision problems, tinnitus, nose bleeds, asthma, reproductive problems and headaches, to name a few. A 2019 Bevington study, analyzed the prevalence of EMS within a given population. Based on a population of 332.4 million people in the U.S., the numbers are staggering: Prevalence of EMS Percentages Number of EMS in U.S. Can't work " 0.65% 2.16 million Severe symptoms " 1.5% 4.99 million Moderate symptoms " 5% 16.6 million Mild symptoms " 30% 99.7 million That means that based on those who can't work or who have severe symptoms, over 7 million are EMS Disabled in the U.S. The symptoms are from the physiological injuries that individuals have sustained from exposure to wireless devices and facilities. Therefore, exposure to mobile apps used on mobile devices, without an alternative means of accessing the web content, will just make matters worse for the EMS Disabled, worsening their condition and denying them equal access to web content and services from public entities otherwise</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	made available to the general public and other disabled individuals.	
135	<p>5G deployment in NYC has been marketed as bridging the "digital divide" for underserved communities when, in fact, it has been confirmed by CityBridge that it is designed for people on the street, and if the signal reaches far enough, then incidentally for residents in their homes. Ultra-high-band 5G being used for the free Wi-Fi will extend about 500', which will provide only incidental access in the home to the extent that it reaches that far. Therefore, the claim that these 5G Cell Towers are going to bridge the digital divide falls flat because the coverage is designed for mobility, not for home use. The National Telecommunications Information Administration (NTIA) has set the national priority for fiber to the premises in regards to funding allocations under the Infrastructure Investment and Jobs Act. That should also be NYC's priority, but CityBridge is being touted by OTI as building out fiber optics networks in NYC for free. However, NYC residents have already paid for fiber to the premises (FTTP) for every home in NYC. NYC residents already paid surcharges on their telephone bills since the 1990s for Verizon to build out the fiber network in NYC. In addition, the 5G towers cannot operate without fiber optics. But rather than bringing fiber to and through the premises to assure equitable access to the Internet, the fiber is being out only to the 5G towers. That means that residents who are paying for mobile services, or trying to get free service if the signals even reach their homes, will get the vastly lower speeds that wireless offers, including 5G. NYC may end up leasing fiber from CityBridge's third party fiber providers at market rates at the expiration of the franchise agreement. The vastly slower speeds of wireless, along with these other shortcomings of NYC having to perpetually pay moneys</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>to these providers to get Internet, makes it a lose-lose proposition for NYC. Municipal broadband “ NYC owned fiber “ would allow equitable access to the Internet in the home and reap the benefits of leasing out fiber to providers “ a win-win proposition for New Yorkers. NYC can be a success story, following in the footsteps of cities that have set FTTP and reaping the economic benefits of municipal fiber broadband (e.g., leasing city fiber to providers rather than leasing providers’ fiber to the city), such as Chattoonga, TN, known as "Gig City" with the fastest internet worldwide. Access to medical programs and services may be accessed wirelessly or by wired connections. The EMS Disabled require access by wired connections or by paper; such programs and services cannot be coupled with wireless-only access, such as by mobile applications and devices. To be clear, access to web content and services is not synonymous with a wireless connection, but would engage any technology which would provide access to a disabled individual so as to receive medical programs and services on an equal basis as others. Requiring access to wired technology, such as copper wires, cable or fiber optics, as well as providing paper alternatives, would help ensure that parity for the EMS Disabled. The National Institute for Science, Law and Public Policy published a report of hard-wiring broadband connections which would be of tremendous benefit for making accommodation for the EMS Disabled. For those EMS Disabled who are so disabled that they cannot even touch a computer to retrieve services via the web, it is essential that there be access to a staffed telephone information line. In effect, a website or check-in device or kiosk by which a person would otherwise access medical programs and services becomes inaccessible to the extent that the EMS Disabled cannot even touch a computer or electronic device to access medical programs and services. Web-based services will never replace the need for an EMS Disabled person to speak to a live person. Cutting off access to a live person would cut off the life-line of the</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>EMS Disabled who would be in dire need of medical services. Creating Safe Zones. A zone should be designed to provide safe web access for the EMS Disabled at the premises of public entities, so that a portion of each such public entity would not expose the EMS Disabled to RF radiation. Wi-Fi/wireless free zones are areas in a building that do not have Wi-Fi or other wireless connectivity and are free of any RF radiation or wireless frequency of any kind, including, but not limited to, that generated by mobile devices such as cell phones, tablets, Wi-Fi routers, or any smart meters on the premises.</p>	
136	<p>Cybersecurity â€¢ Security Vulnerabilities Although Link5G cell towers have been touted to provide free services, including free public charging stations for cell phones, the FBI is warning against using free public charging stations as bad actors have been infecting devices with malware through these stations. Security vulnerabilities are inherent in 5G architecture and, while 5G is being deployed, these vulnerabilities have not been resolved. As to 5G's hackability, "5G networks are much more vulnerable to cyberattacks than their predecessors," as noted by former FCC Chairman, Tom Wheeler. Whereas the 4G network is a centralized, hardware-based switching network with hardware choke points to quarantine any security breach events, 5G is a distributed, software-based network of digital routers with thousands of nodes and access points that a hacker can exploit; there is no choke point control. If a hacker gains control of the 5G software managing the networks, the hacker can also control the 5G network. Even NYC's Chief Technology Officer and Chief Information Security Officer spotlighted 5G's security vulnerabilities in a letter to the National Telecommunications and Information Administration (NTIA) in 2020 (emphasis added): Such complex systems [5G] present more opportunities for security and privacy breaches. By moving away from firmware-based technology of 4G telecommunication components to software-based 5G telecommunication components</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>that will need to be updated, the opportunity for manipulation exists within the supply chain. Furthermore, movement away from centralized network systems to decentralized network systems increases the attack surface of a network. That increased attack surface is amplified by the anticipated introduction of the increasing number and variety of connected devices (IoT) and big data industries. (top of p.3) The problem of IoT vulnerabilities will only become exacerbated by the increased speeds of 5G and other future wireless broadband technologies. (middle of p.3) IoT protection is historically poor and malware distribution is easily scalable, which suggests that the creation of IoT botnets ("robot networks") for malicious purposes, including large-scale distributed denial of service (DdoS) attacks, is likely to increase as well. This poses a significant threat to vital digital infrastructure and resident services at all levels of government, as well as private sector enterprise. (penultimate paragraph on p.3) To further amplify the last point, it has been reported that: "Botnet and denial of service (DdoS) type attacks can bring down whole portions of the network simply by overloading a single [5G] node." Bridging the digital divide requires wired connection (coaxial cable, fiber) to the premises / home / business. See Town Halls on (1) "Gig City Goes Quantum" of the Chattanooga, TN success story of its all fiber network and providing free internet to each household that has a school-aged child; they lease their city owned fiber to providers (that should be the model for NYC) and (2) "Broadband Freedom of Choice" with former Pres. Biden FCC nominee, Gigi Sohn. https://thenationalcall.org/resources/ Communities must be consulted in providing broadband choices, because communities want fiber to the premises, not wireless. See the position paper on the NYC community board opposition to the 5G cell towers on city streets. https://www.dropbox.com/scl/fi/e5jryj9fyey5z3ojffr5/Position-Paper-Link5G-Cell-Towers-10-12-23.pdf?rlkey=gao90cadlogwjc0vqfgx1cbn7&dl=0 Comm</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>unity boards are increasingly rising in opposition to the Link5G cell towers. Sixteen community boards to date have either disapproved or called for moratoria on these towers. This represents (a) 40% of the 40 community board districts currently being considered for Link5G installations, (b) up to 800 community board members, and (c) an average of about 2 million residents. That is more than one-quarter of the NYC population. Elected officials are hearing increasingly from their constituents that they are opposed to these towers in their neighborhoods. Equity districts are bristling at Link5G towers. The message has been clear, they: Do Not Need Link5G Cell Towers and Do Not Want Them. This failure shines a light on the need for broadband freedom of choice for NYC residents. Telecom carriers appear to be dictating the needs of NYC residents, and that conversation needs to be switched to what NYC residents want and need. OTI and CityBridge have stated that it is the carriers who are determining where the purported gaps in service are, whether for current or future demand, but have shown no documentation justifying either, even when requested at community boards. Remarkably, they state that the carriers will not disclose this information because they consider it proprietary. In most instances, even residents are saying that they have no gaps in service where the 5G towers are being planned.</p>	
137	<p>First, NYS must give priority to fiber. Former FCC Chair Tom Wheeler calls fiber "future proof," and wireless only as a last resort, not a first resort. Therefore, when we talk about broadband, it's fiber first, not wireless. Also, NYS was promised fiber by the telecom to the premises and telephone rate payers have paid for this. Where's all of the fiber that was promised to us? Fiber is the superior service. Fiber is scalable from symmetrical speeds of 100 Mbps to 1Gbps to 10Gbps. Fiber has a longer life span of 25-50 years. Fiber is safer and more cybersecure, compared to wireless which is hazardous to our health and to trees, pollinating insects and the list goes on and on. Just look in the FCC docket. On</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>August 13, 2021, the D.C. Circuit Court of Appeals remanded back to the FCC to reconsider its wireless emission "safety" limits dating back to 1996. The Court ruled that the FCC acted in an "arbitrary and capricious" manner "in its complete failure to respond to comments concerning environmental harm caused by RF radiation" below the current FCC limits. Thousands of scientific studies of biological hazards from wireless radiation and hundreds of personal accounts of injuries from wireless radiation were in the FCC docket. With wireless emission "safety" limits dating back to 1996, who would want to buy a car, or board a plane, today whose safety regulations have not been updated since 1996? Also, there is no exemption under the NYS Environmental Quality Review Act (SEQRA) for wireless radiation, and therefore, must undergo environmental review. What insurance coverage can incumbents provide for wireless injuries when there's an insurance exclusion for wireless injuries? See also https://www.dropbox.com/scl/fi/5jttvulnyk1c6kq5s5v71/NYS-PSC-Comments-by-WBI-3-18-22-v4.2-FINAL.pdf?rlkey=vk3v5jtc65opwrcp6tcrdob1&dl=0</p>	
138	<p>There are 1100 public library locations across NYS, including 36 represented by UHLS in Albany and Rensselaer Counties that are currently doing digital literacy and device support work. This framework is an excellent starting point to reach all of NY's communities and should be utilized as the Digital Equity Plan looks to expand digital literacy efforts.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
139	<p>In some cases the Identified Need and Key Activities note a focus on covered populations, but covered populations are not specifically addressed in the Measurable Objective or Proposed Impact Metrics - will more granular objectives be added related to their specific needs? The measurable objective in 5.1.1.D is not enough, based on my communications and my own experience as someone benefitting from the ACP! While increasing "awareness and adoption of internet affordability programs" will help, we identified that even</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>with the ACP, internet is still not affordable for many households that I know of, or not reliable enough to be worth the cost. For 5.1.2.C, where "virtual/video/screenshare technical support" is mentioned, phone based support can also reach people who can't come in person, without necessarily needing an internet connection or having remote communication tools already set up. Also some may prefer print guides with step-by-step instructions, screenshots, etc. Based on our communication with organizations who work with the aging, these methods may be preferable. I provide this kind of support often for students and family members. Where 5.1.5.A includes "universal accessibility standards" it is important to acknowledge the differences between accessibility, usability, and inclusivity, and the need for all 3 in the design of public resources such as government websites. Considering the high figures for smartphone and tablet use in the survey data, and discussed in our community interactions, it will be important for public resources to use mobile-first or responsive design strategies. Where 5.1.5.B is focused to "Develop outreach campaigns to increase covered populations' trust in online government services," there is no mention of actually making online government services more trustworthy. If this is expected to be addressed in 5.1.5.A, that connection should be articulated better to make it more explicit.</p>	
140	<p>I would like to know more about the Community Anchor Institutions mentioned in 4.2.4, to help with regional planning and to examine possible solutions with my students.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>
141	<p>The "affordable internet options database" mentioned in 3.1.5.3 actually highlights the lack of choice in some areas: for example, when searching for Ulster County, the only option currently listed is Spectrum Internet Assist. Sharing of data from the New York State Internet Access Survey will help greatly with regional planning: for example the speed test data mentioned</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>under 3.2 on page 48 would help with challenges to the broadband map. This is something I am eager to access as a researcher, and to look at with my students. The attention to intersectionality in 3.2.1 (p.55, and in Table 20, p. 155) is greatly appreciated, as we found that the format of the CAO regional needs assessment limited our ability to address this factor. The highlighted intersections for each covered population can help greatly with program planning to keep complex user needs in mind. Can more information be shared about the design of the New York State Internet Access Survey instrument? We would appreciate knowing how the options for certain questions were chosen, such as the activity options under "Digital Confidence" (p. 94, Q21 in Appendix 1.2.1) or options in Q2 and Q26, especially if they are based on any past instruments / research. Similarly, we wonder about how the list in Section 2, Question 1 of the New York Community Anchor Institution Survey was determined, as we independently came up with a similar list for our own asset inventory process, and would like to match with other instruments/research if possible. Is it true that the New York State Internet Access Survey was limited to 1 response per household, as shown in Appendix 1.2.1 (p. 57)? If so, this is a serious limitation on the data, not acknowledging different covered populations in each household, and their different perspectives. While STDEC members put in significant work to make it possible for survey participants to fill in a paper form if they did not have online access or comfort, the statewide results show that 98% of surveys were completed online (under 7.2 Survey Data Analysis Methodology, p. 151). This is concerning, showing how the digital divide makes it even more difficult to reach those most affected by it. This bias in the survey results needs to be made even more clear, and points to the need for significant resources for marketing both surveys and programs to those most affected by a lack of digital equity.</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
142	<p>Current issues in public education are a glaring omission in this plan, starting with the high level overview on Education in Section 2.3.2. As a faculty member of the School of Information Studies at Syracuse University, I teach graduate students who are emerging librarians about the current landscape of educational technology. I have taught 3 cohorts of students in a row who are current NYC classroom teachers, and it is clear to me that their concerns, and those of their community members, are not present in this plan. In my repeated re-reads of this plan, the focus is on workforce training and adult education, with barely any attention given to the needs of K-12 students and teachers, many of whom don't have consistent access during the school day either to working devices or to the internet. Given the chronic budget cuts to schools and libraries in NYS, funding streams from the SDEP could be a way to reinstate some effective programs that were cut, or to start programs that otherwise never had a chance with existing funding. However, it is not clear how schools can fit into this plan among all the other priorities included. It is also notable that the survey was for people over 18 only, but does not seem to have included any questions about roles as parents or caregivers, and their need for digital access to resources for the children in their households. For example, the recommendation under 2.3.2 to "Shift digital inclusion efforts from building-restricted Wi-Fi and device loaning to household internet and device ownership" (p. 19) does not feel realistic based on my community interactions and their concerns about affordability. This should not be an "either/or" and a "shift" but rather an "and" and a supplement. Community members will continue to need access to the internet, devices, and support in convenient and comfortable community locations, at convenient hours. I have heard many stories from my students about the ways that bring-your-own-device programs add labor for teachers and support staff to assist students with a wide variety of different (often outdated) devices. They</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>repeatedly discuss the need for maintenance of technology, and on-site full time staff to help with technology troubleshooting, which often falls to school librarians or teachers instead. Of the funding allocations in section 2.1, it will be important to provide pathways for small organizations to receive funding, perhaps through partnership with larger organizations, since they may not have the capacity for grant writing or for funding work while waiting for reimbursement. Where "Choice" is included as one of the 5 digital equity principles in 2.2, a persistent omission in all of these plans / discussions is the fact that some New Yorkers choose NOT to be online, and have good reasons for doing so. Their choices also need to be respected, with services still provided in traditional non-digital ways (in-person, mail, phone) and/or the ability of trusted Digital Navigators to assist them or even do tasks for them using online services through Community Anchor Institutions. I appreciate the acknowledgement, in section 2.3 on p. 19 and elsewhere, of the role that public libraries have played in bridging the digital divide. While libraries have struggled with severe budget cuts with a negative impact on their existing library digital equity programs, state funding targeted for digital equity will help to maintain and to expand these programs. For "peer-led digital literacy training programs" (2.3.3) to work, it will be important to provide competitive compensation for the peer leaders. The "funding for accessible information and plain language training" in 2.3.5 will be beneficial not only for people with identified developmental disabilities, but for all New Yorkers. In 2.4.1 one method mentioned is "Releasing data CAO collects publicly as mechanism for transparency and accountability, supporting Strategies 2 and 3 by allowing communities to independently understand and act on the data, respectively" (p. 28). We have asked for data from the New York State Internet Access Survey from Southern Tier respondents, but it has not yet been made available to us. We are eager to have this data to do our own more granular analysis for our region, to guide future planning. We are</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>also concerned that it says in Appendix 1.2.1 that "Data from this survey will be retained for one year following the approval of the State's Digital Equity Plan, then destroyed" and hope that data relevant to the individual regions will be shared well before that, and regions will be provided with guidance about any limitations on use of the data.</p>	
143	<p>I have worked on comments for both the STDEC and NYSDEN, and I am copying comment here that also resonate with me personally, or in my role as an Adjunct Professor for Syracuse University where I teach graduate students about educational technology. Of the 5 outcome areas listed in 1.1, p. 12, it will be important to balance funding to support all 5 rather than focusing only on the economic and workforce development that is the interest of corporate stakeholders. Appreciate the focus on collaboration and capacity-building in the 4 strategic pillars from section 1.2, and are eager to see how funding will support the labor of community members and other stakeholders to participate in the planning and implementation process. It is important to note the challenges to "center the experience and expertise of covered populations" (p. 12) without providing compensation or other incentives for members of covered populations to participate actively. Developing the capacity of Digital Equity Coalitions and Networks is key to the success of the plan and will strengthen the implementation of CAOs objectives. Direct capacity building grant funding to help with organization and structure would help to strengthen coalitions. Lifelong learning is only mentioned in the Executive summary on page 11, but should be emphasized as a part of sustainability - the digital landscape is constantly changing and people need to learn how to learn if they can ever keep up!</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
144	<p>- I would imagine low-income households are less likely to have a variety of things just because they have less money. Some of it's a bigger problem than just digital stuff. - If libraries were funded well and a trainer certification were available (for computer maintenance and troubleshooting), the state could create an army of trained people in key places, then you think about the people who come in and get trained, then they could become trainers. The economic growth connected to this increased knowledge of just doing things on the internet and providing technical support could be significant. - There should be an emphasis on distributing refurbished devices, because that's where you're going to get some of the lower income folks. They can't go buy a new computer but they could afford one that's been refurbished. - Needs relating to people with disabilities need to be clearer: individuals living with disabilities are deterred by not having assistive technology and therefore less 8% more likely to live in homes without laptops. Otherwise, it's odd to single out a specific group that has a low number of laptops in their home. - Many people with disabilities that don't have internet access are living in congregate settings. One barrier in those environments is agency policies about keeping personal computing devices. This might need to be addressed as well. ## Activities - Larger electronic devices could have a modest deposit where you pay up front, but if you recycle it you get the deposit back. That could encourage recycling and make more devices available to be refurbished and given to low income households. Many people buy a new laptop or computer every year or every other year, so there are lots of usable devices that could be refurbished. - You could have like a library staff person that is your tech support person for a community. Or staff could travel to senior centers and other community settings monthly so people can bring in their devices in get help. - Devices can't be distributed and refurbished unless they're collected first. The activity needs to include that collection piece, which raises other questions about</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>activities. - Safe disposal and recycling really has two aspects to it: toxicity/environmental concern and ensuring that a person's/household's digital footprint is no longer on that machine. - One of the challenges with assistive technology is the inaccessibility of the software itself. Partnerships with device manufacturers could also be extended to software developers to promote accessibility and accessible design.</p>	
145	<p># Digital Literacy ## Needs - Percentages of people struggling to use the internet within the covered populations seem low. - Digital skills classes and technology programs must be available to people who are incarcerated or newly re-entering the community. These skills are necessary to survive outside of prisons, especially if we expect them to get and keep good jobs. - Digital literacy really seems to be focused on technical skills, but omits information and media literacy, which is equally important. - For people with developmental disabilities, lack of information and media literacy is one of the biggest barriers to access since they can't navigate safely. - Lack of consistent curricula and standards is definitely a major problem. A program/curriculum/standard that all community-based digital literacy programs could get behind would be a game changer. - It would be great if there was a certification for digital skills. You just go online and do certain tasks, and you get a certificate that you can take to an employer who could then be confident that you have certain skills. - Look to partners and neighbor states (e.g., New Jersey) that are passing information and media literacy standards (e.g., CSDF - Computer Science and Digital Fluency - standards). Public libraries, school libraries, and school library systems play a role in helping to address those needs so that the younger generations as they're preparing to transition into college or work. ## Activities - Prioritize search skills along with information/media literacy over fact memorization/retention in schools. Teach students to get good information and how to filter out disinformation. Let them use it in the class and incorporate it into your</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>lessons. - I was almost wondering if we could do something like when you go to the DMV and you drive a license, they ask you, you want to be a donor. An organ donor or something like that. So it's a program they have to ask you. It's like part of their job if you're getting a license or whatever. I almost wonder is if those seven different programs like food stamps and heat and all those things is if they have to ask their clients, do you know about the ACP? Do you need internet subsidy? Do you need digital skills? And even if they say yes, they just check a box someplace and that information goes to somebody who can reach them out and do that. I guess it could be two steps. Can you do it yourself? And if not, we can have somebody reach you maybe. Or something like that. - Be sure activities include educating adults of children with technology and offering that support. Parents need to know how to help their own children with cybersecurity, with digital fluency, with settings and how to lock down their devices. This is also true for information and media literacy as well. - "Educators" needs to mean people who are providing training, not specifically K-12. - Internet service providers should have a role in providing training. So they get money to build the last mile and they get those customers, they should have some obligation to provide some digital literacy training. - These needs, objectives, and activities are very much focused on skill building for jobs. It's not all about jobs. People need these digital skills even if they're not going into the workforce. - As far as training for "educators," you have to explore the needs of tech/digital skill trainers and identify the stakeholder groups that have a role in providing those trainings. What trainings do they need to be able to teach digital skills?</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
146	<p># Privacy and Cybersecurity ## Needs - Provide information, training, and resources to help promote safe online interactions. This can focus on the ACP subscribers, but more generally it needs to start at the school level. Overall, children and elderly are the two most populations, so they need to be addressed. - Shifting the burden of protection away from individuals is tremendously important. This might involve more regulation to prevent always-on listening devices (e.g., Amazon Echo, Google Home, Apple HomePod) from mining your data. - Regulation can be used to relieve the burden for online safety from the individual a little bit. This is happening in Europe, and there needs to be an accountability mechanism for companies that violate these regulations (e.g., fines). - There needs to be an emphasis on helping people keep their personal information safe, avoid being duped by phishing and spam emails. - Becoming comfortable with the internet is a function of there being appropriate legislation as well, being imposed on banks or others who might abuse the internet. To the extent that ConnectALL can play a role in promoting and promulgating legislation and regulation that helps to build a safer ecosystem, that should translate into people feeling more comfortable about using broadband. ## Activities - Service providers should be compelled to provide a lot of security protection, since the data flows in and out through their equipment. - Social engineering is a much bigger concern than technical hacking/cracking. Privacy and cybersecurity training needs to place a strong emphasis on recognizing and avoiding social engineering attempts. How do we raise awareness of these issues? Is it similar to a public health campaign? - Laws on phishing/scamming/social engineering need to be much stronger, though they're harder to enforce because a lot of it takes place out of country. - Publishing guidance on key elements to digital safety and ensure awareness of safety measures and data privacy are consistent across school districts is a heavy lift. School districts</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>need funding for full-time data privacy officers. Currently, those responsibilities fall onto an existing staff person and their already busy workload. - Seniors and New Americans (e.g., refugees) are a very high risk population as far as privacy, cybersecurity, and online safety are concerned. - ConnectALL must leverage partnerships with organizations working with covered populations (e.g., AARP for seniors) to ensure that guidance is published and makes its way to these people. Across all activities, it makes sense for ConnectALL to ensure that they're partnering with the right organizations that they can leverage to do the tasks that need to be done to reach the populations they need to reach. # Accessible Resources and Services ## Needs - The needs are very hard to understand as they're written. ## Activities - Outreach needs to happen through organizations that people already have contact with. Instead of creating a new outreach program, take advantage of people's existing contact with the government to get them the information about accessing resources and services. - Standardization is good. Is there an opportunity to create standards beyond just New York State? Ideally, this is done on a larger scale so that government websites are consistent across levels (local, state, federal). - ADA compliance should be a minimum standard, but the goal should be to be far more accessible than ADA compliant. ADA was passed near the dawn of the internet, so it doesn't do a good job with updated standards. - New York State needs to continue funding for Novel New York, which is a suite of online, vetted, reliable databases that are accessible anywhere in New York. It's been a critical resource for schools, public libraries, and academic libraries. - Government websites need to be written in plain language and intellectually accessible. This will help not just people with intellectual disabilities, but everyone. - What does it mean to explore methods of shifting the burden of protection away from individuals? What does that look like? - Take advantage of the existing connections that people with disabilities have</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>with other providers and use those providers to identify opportunities to meet needs. - Security and privacy are especially important for government websites, because if your personal information gets hacked or leaked from using a government website, they'll lose trust in the government. - Why limit accessibility considerations only to government services? Maybe it should be community services in general.</p>	
147	<p>Part One: Broadband Availability Comment on CAI: The plan mentions Community Anchor Institutions (CAI) and their roles in forums in Spring 2023, but does not mention CAI specifically in the descriptions about grant programs. Here is one example from Capital Region: Columbia County has 88 Community Anchor Institutions that do not have high speed internet. Community Anchors should be prioritized in grant applications, and Counties should determine how many under-resourced Community Anchor Institutions will be connected. Part Two: Device Support Comment: Device distribution is a massive lift for individual coalition organizations. Regional backbone organization can help to coordinate and advance this work. ConnectAll office should support a single coalition member organization in each coalition to add a staff member who could coordinate device distribution work. Having a central manager would advance collective impact. Comment: Some of our organizations have had a hard time getting device distribution programs off of the ground. We should all utilize 211 more. This is a topic we will discuss in a future Coalition meeting. ConnectAll office should support coalitions that are utilizing 211 to advance collective impact. Topic 3: Digital Literacy Comments on 5.1.3, p 133: (1) We enthusiastically support the creation of a directory of digital skill-building programs. (2) We would like to see more clarity on “marketing efforts” and acceptable costs for marketing efforts. Comment on 5.1.3 p. 134: Which model of Financial Incentives for training will be used, or suggested? Two common models are programs which pay individuals on a weekly basis to attend a program (paid training); other</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>models pay attendees at the end of the program. Our experience in the tri-cities of the Capital Region is that paid training is preferable to paying trainees at the end of the program. What metrics will be in place to evaluate the efficacy of incentives? General Comments on 5.1.3 (1) Play should be included as a form of training, especially for K-12. (2) Digital Literacy is a top priority for almost every library in the state of New York. The plan should not encourage duplication of services. New organizations should not be created where a local library can take the lead. New York’s libraries need support to add new staff positions to expand Digital Literacy trainings and Digital Navigator services. Topic 4: Privacy and Cybersecurity Comment on 5.1.4: Increasing “the number of assets providing training” feeds into duplication of service. Alternate metrics could include the number of trainings, the number of attendees. An important alternate metric would be a decrease in the number of New Yorkers concerned about online safety. Topic 5: Accessible Essential Resources Comments on 5.1.5: (1) Trust in online government resources is an underlying problem. How can we rebuild trust? This may be too big for our goals but should be kept in mind as an underlying issue. (2) Government websites are having difficulty keeping up with changes in standards and platforms. Can the work of the ConnectAll office provide some consistency here or help rural government entities update? (3) ConnectAll Office should provide support for Electronic Records Management transition and integration for local governments (4) ConnectAll office and Digital Equity Coalitions should encourage better utilization of 211. General Comments: Disability advocates were concerned that 90% of the replies were online and had questions about how the survey was distributed</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
148	<p>1. Preparation at the local level a. How can local municipalities prepare b. How should local and county governments relate to eligible entities, such as providers of Internet service and Digital Equity services. This is akin to a chicken and egg question. 2. Internet Service Providers' accountability What regulatory safeguards are in place to ensure that ISPs prioritize building out every unserved location instead of going for the more profitable already served (some with redundant wired service) locations? 3. Infrastructure - Pole access and make ready costs Pole access and increasingly expensive make ready costs remain persistent barriers to broadband deployment, especially in rural areas. a. What is the status of the NYS Assembly Bill A2396A, also known as the Pole Bill, which Governor Hochul signed into law in Dec 2022. The bill seeks to lower make ready costs by reducing the price of broadband attachments to already existing poles. Under this bill, pole owners can no longer threaten pole attachers with the cost to replace the pole entirely and costs will be distributed among all parties, making the relationship more equitable. Poles are owned by power and telephone companies who lease space to internet and cable service providers. In addition to rent, the lessees had to pay for the cost of construction and attachments. b. What is the status of the NY Assembly Bill A10932, which Governot Hochul signed into law. The bill seeks to repeal provisions of the highway law and the transportation corporations law to reduce the cost of expanding broadband access. Relates to repealing provisions of the highway law and the transportation corporations law to reduce the cost of expanding broadband access. The "fiber optic tax" refers to fees which in recent years were levied on fiber companies looking to use state-owned rights of way. Politicians repealed the fees as part of the state's approved fiscal 2022 budget. Fiber providers believe that the tax was duplicative of the franchise fees they currently pay, and the new permitting process resulting from the fee has created significant delays for our fiber build. The repeal</p>	<p>Comment reviewed and considered; automatic reply sent to commenter.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>is a positive step to support accelerated fiber deployment in the state. 4. Inventory of digital assets and barriers Section 5 and 6, Activities: Deploy the NYS Digital Equity Asset Inventory as a "digital directory." Great idea! a. Is the State's digital directory and list of barriers designed to be updated? b. If so, what is the process 5. Public safety a. In the interests of public safety, add trailheads and public outdoor recreation facilities to CAIs 6. Communications and coordination Congratulations on the unprecedented statewide assessment of the state of digital equity in the State. We propose building on the momentum in the following ways: a. Improve communications in order to cast a wider net. Announce early and send reminders. b. NYS schools conduct broadband surveys every year. no deadline - send weekly reminders survey(s) became white noise that people ignored. This became an issue when we promoted, and solicited participation in, the NYS Digital Equity Survey. The overlapping - and competing - surveys caused confusion and apathy for people already fatigued by broadband surveys. 7. High cost areas The new NTIA designation of "high cost area" provides an increased ACP subsidy of \$75 to eligible households in those areas. a. Has the State mapped the areas? b. Is the map accessible? c. Is there a challenge process? 8. Accessibility a. How is "accessible" defined in the plan? b. Make the Public Comment website ADA compliant and otherwise accessible. 9. Digital Equity Plan - UC CCDI submission The State Digital Equity Plan includes two budgets submitted by UC CCDI. a. What does this mean? One of the submitted budgets is under development. b. Should we resubmit as we flesh it out based on forthcoming information? c. How do we do that? 10. Barriers to access digital equity resources for populations that speak languages that are unaccounted for in federal and state broadband programs. An example is Kekchi*, one of the Mayan languages spoken within Kekchi communities in Guatemala and Belize. It is the third most widely spoken language in the City of Kingston in Ulster County, after English and</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>Spanish. The majority of Q'eqchi speakers do not speak Spanish, which makes it close to impossible for them to navigate the bureaucracy and technical terminologies needed to perform tasks as basic as calling up Spectrum to sign up for service. The Kekchi language is primarily oral with no standardized writing system. I'm not aware of a Kekchi keyboard. This makes using machine translation or dictionaries to try to bridge the gap both extremely difficult and highly risky. Interpreting services are rare and expensive because of the scarcity of interpreters. Unfortunately, Digital Navigators located at local libraries generally do not have the language capacity to do this work. It would take people sitting down with families, one-by-one, filling out the forms for them. These unserved and underrepresented communities rely primarily on The Ulster Immigrant Defense Network for support. UIDN is a 99.9% volunteer-based organization with one part-time paid position. Because of these limitations, UIDN is unable to address things like internet connectivity, because their limited personnel resources are focused on survival issues like rent, court and healthcare. Daniel Woodham, UIDN Caseworker offered the following concerns. Barriers to access services for this population are many. They include: a. Few people that I have met are Kekchi* AND English fluent - in speech and in written form. They tend to be in high school still or originated from Belize instead of Guatemala (Belize = national language is English) b. Knowing how to work with a computer/owning a computer or device other than a cell phone is minimal in the adult population. c. Everyone I know that fits the description already has work during the training hours/days. I don't think it's feasible to ask them to risk losing their jobs to go to unpaid training that will place them in volunteer unpaid positions. d. High school students typically also work after school or are childcare providers so parents can work - and I'm not sure if the maturity level is there for high schoolers to take on this volunteer effort effectively. e. Thus we may continue to have an underserved population lacking the access to digital services enjoyed by many. * Note: The</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	alternate spelling of Kekchi is used in place of the actual Q'eqchi'. It seems to help English speakers correctly pronounce the name of the language/people.	
149	<p>I am writing to address the recent New York State release of its Digital Equity Plan and initial proposals for the BEAD program, which did not contain support for no-cost broadband adoption programs. This is a myopic and ineffectual course of action, which will have major ramifications if no support for no-cost broadband adoption programs is given. In our modern day, internet access is not a luxury. It is a vital necessity and a basic human right. However, like other vital necessities today, rising costs have forced New York families to forgo broadband access. This state of affairs cannot exist. The status quo means disenfranchisement, isolation, and stagnation. Lacking internet access could deny those without it the opportunities to effectively attend school and learn, build generational wealth, access government resources and benefits, achieve financial independence, and much more. If the New York State's Digital Equity Plan is not changed, disenfranchisement will continue. The number of individuals who do not have broadband access today is not small. There are many areas across the City where large numbers of people do not have broadband access. In Council District 18, many areas lack broadband, let alone basic affordable options for broadband. Unfortunately, my district is not unique in its lack of broadband access. I see high rates among NYCHA residents, as the lack of broadband access is a chronic issue across the Bronx and the City as a whole, where 30-40% of residents in New York City lack broadband. A majority of these residents are either people of color or underserved communities. With numbers like these, the socio-economic factors on quality of life are too great to ignore. That is why I urge the prioritization of no-cost broadband adoption programs by New York State as a</p>	Comment reviewed and considered; automatic reply sent to commenter.

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>component of The State’s Digital Equity Plan. New York should be leading these efforts and NYCHA should offer such services. New York City cannot continue to take on the sole responsibility, with projects like the three-year-long Big Apple Connect program, which is the largest municipal program to cover public housing residents’ internet costs in the nation. The program worked with Altice and Charter to provide over 100,000 NYCHA-managed households with broadband access and other benefits that have improved the lives of hundreds of thousands. Programs like Big Apple Connect have drastically closed the broadband adoption gap, and have provided a multitude of benefits to the City. It is time for New York to do the same, and Big Apple Connect provides a framework to work off of, improve upon, and expand to the State. The Digital Equity Plan from New York State does not explicitly list no-cost broadband adoption initiatives as one of the efforts planned to eliminate the digital divide. The plan must clearly state support for no-cost broadband adoption programs, which must be categorically focused on barriers to adoption. The economic reasons alone should make this choice easy. I hope that the New York State Digital Equity Plan will be revised to support no-cost broadband options for NYCHA residents. This is an opportunity to bridge the digital divide and create economic opportunity. If not, New York State would be doing a disservice to all without broadband access by not allowing the plethora of benefits created by internet access to occur, take root, and flourish. I hope the right decision is made for all New Yorkers.</p>	
150	<p>Thank you for the opportunity to provide comment on the ConnectALL State Digital Equity Plan and Broadband Deployment Initial Proposal. As Chair of the People with Disabilities Committee, I would like to take this opportunity to share the comments I have heard concerning accessibility in the proposed plan. Internet access gives people with disabilities unique challenges and opportunities that were not adequately addressed by the Five Year Plan. For example, people with</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>blindness and deafness require communication facilitators and braille displays to access the internet, however, plans to breakdown systemic barriers of cost and accessibility for those systems were not addressed in the Five Year Plan. Furthermore, people with disabilities were not adequately surveyed in the state. No meetings for people with disabilities were held in the Mid-Hudson region, the Finger Lakes, the Mohawk Valley, and the Capital Region to solicit feedback from residents in those areas. Statewide broadband access is a necessary and commendable initiative for New York State, and Governor Hochul's historic investment in the ConnectALL initiative will promote equity in New York. However, as Chair of the People with Disabilities Committee, I implore you to take comprehensive steps to solicit feedback from New Yorkers with disabilities by holding more meetings across the state and hearing from as many people with disabilities as possible about the specific challenges they face when it comes to internet accessibility. Thank you for your consideration of my comments. Please do not hesitate to reach me for more information.</p>	
151	<p>New York Digital Equity Plan Ignores Website Accessibility. New York's Digital Equity Plan lacks meaningful mention of how New York plans to achieve basic web accessibility by the private sector. In December 2022, Governor Hochul signed S7572A/A8453A. These bills I helped create needs to be expanded to ensure website accessibility is institutionalized. Providing everyone broadband access to the internet is ineffective without basic web accessibility. New York's Digital Equity Plan must include a framework that makes the private sector convert to accessible websites. Digital equity means businesses stop selling overlay and widget products with false claims they provide "fixes" for what is industry standard accessible website design. Structural flaws in Draft New York Digital Equity Plan • Digital Equity Task Force formed in 2023 failed to include representatives from office of Chief Disability Officer, Justice Center,</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>Commission of the Blind or Interagency coordinating council for Deaf, DeafBlind and Hard of Hearing. • Digital Equity Coalitions do not have meaningful representation of sensory challenges or disabled • Community Anchor Institutions fail to meaningfully include important organizations focused on sensory challenges and disabled communities • Lack of accessible invitations, adequate notice of meetings • failed make it easy to obtain accommodations at events • hosting only in person meetings for disabled focus groups • limited number of disabled focus groups not geographically representational • New York State Internet Access Survey only distributed online lacked effective questions. Ineffective Community Engagement. Regional Disability Focus Groups used to create plan lacked meaningful geographic and demographic representation of all disabled communities. According to CAO’s state snapshots, New York has a population of 20.1 million. New Yorkers with disabilities make up 12 percent of the population or 2.4 million. CAO and partners held only six disabled focus groups in which merely 66 people attended.</p> <p>The sample size lacks credibility. • No disabled focus groups in Mid-Hudson, Finger Lakes, Mohawk Valley, Long Island or Capital Region. New York State Bill makes vendors and contractors liable for website accessibility. Only Nine (9) people in NYC, five (5) in the Southern Tier and seven (7) in Central fails to provide an accurate picture of our state’s disabled population. People could only participate by attending on-site. Due to the inaccessible CAO partner invites and the state’s lack of a funded statewide DeafBlind CoNavigator program, our community’s concerns have yet to be incorporated into New York’s plan. • Why were two focus groups held in Western New York but not in every region? • by only hosting in person for disabled communities, this is excluding people with mobility challenges or those that might have health concerns about public gatherings. • Three sample invites are attached. None of them are accessible, all are heavy on graphics. • why should</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>someone disabled have to go only to the "disabled" event? In every region of New York State, CAO and its partners systemically excluded or marginalized Disabled New Yorkers from the community engagement process. How does CAO intend to “prioritize and streamline activities” when CAO staff does not understand how to create accessible event invitations? Flawed Design - Needs assessment Page 12 The CAO team’s failure to adopt a disabled lens to create their community engagement plan prevents the New York Digital Plan from achieving the legislative intent of the Digital Equity Act. Disability is the only intersectional identity inclusive of all other demographic considerations. Within the Disability spectrum, individuals with sensory challenges are the only covered communities with extensive accessibility concerns that CAO and partners needed to understand before holding public meetings. They did not.</p>	
152	<p>Meaningful Access to Effective Communication was not present during the community engagement process. CAO needs to hire someone with relevant life experience to ensure accessibility in future CAO sponsored meetings. The casual ableism of CAO staff undermines its credibility. Section 2.4.2 Measurable Objectives • 2 Accessibility of Devices and Device Support • 3. Digital Literacy These nine (9) bullets points fail to acknowledge the unique concerns of New York’s DeafBlind community. For example, New York presently does not have a funded statewide DeafBlind Conavigator program. The lack of this critical program makes it difficult for adult deafblind to live independently, e.g. run simple errands, attend job training classes, find employment, or attend civic events like ConnectAll’s listening sessions. New York state also lacks a funded Communication Facilitator (CF) program. Without the availability of a communication facilitator, it is very difficult for many in the deafblind community to access the internet – even with necessary connection and equipment. CAO could still provide a broadband connection and necessary equipment, e.g., refreshable</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>braille displays, however, in order to achieve the goals of the Digital Equity Plan, New York State would still need to make significant investments in braille literacy and increase the number of trained deafblind interpreters and communication facilitators. 7.2 Page 54 Appendices Part 2 New York State Internet Access Survey only distributed online and lacked effective questions Survey distributed May 18 to July 15, 2023. If the survey was only distributed online, CAO neglected to reach covered communities presently lacking internet access. Without mailing Braille or Large Print printed surveys, CAO failed to make the survey accessible to covered communities. The survey fails to ask valuable questions related to assistive technology, e.g.: • Do you use (or need) assistive technology to access the internet? • Can you afford the assistive technology you need or want? New York’s digital equity plan needs to have an implementation plan for distributing refreshable braille displays and ensuring braille literacy. 1.4 stakeholder engagement page 12 The Digital Equity Coalitions, Community Anchor Institution and Digital Equity Task Force groups that ConnectALL relied upon to draft this plan lack meaningful representation of disabled New Yorkers. “continuing to support the capacity and sustainability of regional DEC’s”, page 25 Digital Equity Coalitions Table 11, page 118 Digital Equity Coalitions currently do not incorporate meaningful representation of disabled communities. Only the Long Island group had one. Just having one group that does not focus on sensory challenges, when Long Island is home to the National Center on DeafBlindness and Helen Keller National Center for DeafBlind Youths and Adults amplifies the failure of the New York Digital Equity Plan to meaningfully engage covered communities. For the New York City region, the AARP group is not a community-based organization. • Capital Region Digital Equity Coalition • Central New York Digital Inclusion Coalition Does not list members (“The CNY Digital Inclusion Coalition is a group of community stakeholders in Central New York working together”) Community Anchor</p>	

	Public Comment	Written Responses and Actions Taken by State in Response
	<p>Institutions (CAI) CAI List reflects CAO lack of awareness of the organizations that provide support to disabled New Yorkers. The CAI List includes outdated reference to Jewish Guild of the Blind. In 2013 two longtime NY organizations Jewish Guild Healthcare and Lighthouse International merged to form Lighthouse Guild International. The CAI list misspells “Andrew Hiskell” when referencing Andrew Heiskell Braille and Talking Book Library. The CAI list only included four out of eleven New York’s schools created to support families with children living with disabilities (4201 schools).</p>	
153	<p>CAI List ignores other disabled communities. The CAI list includes only a small handful of county chapters affiliated with ARC of New York, the family-based organization focused on people with intellectual and developmental disabilities⁹. Similarly, the CAI list included only a few independent living organizations. Independent Living centers not considered CAIs included: Time Consuming and unnecessarily Complicated to Comment</p> <p>I am writing this sentence after trying to upload comments to the ConnectALL comment page. CAO is preventing meaningful feedback by making it unnecessarily complicated to provide public feedback on a public spending plan worth hundreds of millions of dollars. The portal comment sections do not allow you to simply upload a comment letter. The portal restricts length of a comment. CAO is deliberately attempting to limit public feedback. CAO is perversely expecting individuals lacking internet access to use the internet to submit comments. CAO’s comment portal did not include alternative options to mail or fax a comment. For the above reasons, ConnectALL must train its staff on how to plan accessible meetings before holding additional hybrid events that would make it possible for New York’s DeafBlind and other disabled communities to participate in charting the way forward for New York.</p>	<p>Comment reviewed and considered; automatic reply sent to commenter. Supplemental engagement with People with Disabilities conducted.</p>

	Public Comment	Written Responses and Actions Taken by State in Response
	Please contact me with any questions. Text and email are the best ways to contact me.	