

February 21, 2023

RE: City of Long Beach Public Comment—Docket No. 22-69

To Whom It May Concern,

On behalf of the City of Long Beach, I am writing in response to the Federal Communications Commission's (FCC) request for comments related to the proposed rulemaking to prevent and eliminate digital discrimination of access to broadband (Docket No. 22-69).

Long Beach is a leader in the equitable application of technological solutions that address key environmental, economic, and community needs. In an effort to advance equity, resilience, and community-centered policymaking through technological solutions, the Long Beach City Council approved the development of a Smart City Initiative in October 2019. The adopted [Smart City Initiative](#) outlines a vision, guiding principles, and actionable strategies to leverage data and emerging technology as strategic tools to solve challenges in our community. The first principle of the Smart City Initiative is to design for equity. We are committed to reducing historic inequities and disparities by ensuring technology advancements are accessible to all and improve quality of life for communities that have been underserved.

When we examine internet access by race/ethnicity in Long Beach, we find that households of color are twice as likely to be without Internet when compared to their White counterparts. Older adults and youth also disproportionately lack Internet subscriptions. These inequities underscore why Long Beach's digital equity efforts continue to lead with a racial equity lens to ensure that everyone has equitable access and use of technology—regardless of their background, neighborhood, or identity.

In developing the FCC's rulemaking on preventing digital discrimination, the City recommends the following:

- The definition of digital discrimination of access should be expanded beyond income level, race, ethnicity, color, religion, and natural origin to include social characteristics such as age, primary language spoken, and others where evidence has shown that disparate impacts exist. In addition, the definition should disaggregate color into race and ethnicity.
- The rulemaking should seek to achieve and facilitate equitable access, rather than equal access. This terminology accounts for existing and historic service gaps and outcomes that have resulted from digital redlining, uneven deployment of internet and technology services, and other policy decisions.
- The FCC should measure discrimination not merely by the intent of a decision or organization, but also its impact.
- The FCC should strive to protect local government's ability to facilitate broadband and internet communication services to their stakeholders as well as government's local control in regulatory matters concerning Internet telecommunications.

The key measure of success for the FCC's rulemaking should be advancing economic and social



opportunity through the connectivity of people, emerging technology, and broadband infrastructure. With the historic opportunity provided by the Infrastructure Investment and Jobs Act, the FCC is poised to facilitate equitable access to broadband across communities like Long Beach.

Thank you for your consideration of these important priorities in developing the FCC's digital discrimination rulemaking. If you have any questions, please do not hesitate to contact Tyler Bonanno-Curley, Manager of Government Affairs, at 562-570-5715 or Tyler.Curley@longbeach.gov.

Sincerely,



THOMAS B. MODICA
City Manager

cc: Senator Dianne Feinstein
Senator Alex Padilla
Congressmember Robert Garcia, California 42nd Congressional District
Congressmember Nanette Barragan, California 44th Congressional District

