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Councilmember

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Councilmember

August 28, 2023

Alice Reynolds, President  
California Public Utilities Commission  
505 Van Ness Avenue, 3rd Floor  
San Francisco, CA 94102-3298

**RE: SIGNIFICANT CONCERN FOR FEDERAL FUNDING ACCOUNT PRIORITY AREAS MAP**

Dear President Reynolds:

The City of Paramount is writing to express its dismay regarding the revised Middle Mile Network Map released on August 3, 2023. In the prior version, Los Angeles and the South Los Angeles communities from the Gateway Cities including South Gate, Lynwood, Paramount, Bellflower, Compton and Lakewood were a part of the 18 projects being planned. Now, they are now virtually excluded.

**These revisions completely disregard our most underserved communities experiencing the widest digital divide epidemic in the State. This is absolutely a disenfranchisement of our communities of color and only enlarges the digital divide and threatens any equitable shot at participating in our region's many economic, educational and civic opportunities.**

For nearly two years, we have been working tirelessly with numerous partners to plan around this funding to bring fast, reliable, and affordable broadband access to the families and small businesses. Since the passing of SB 156 (D-Gonzalez, 33<sup>rd</sup>), UNITE-LA has shared recommendations on the overall approach and on the needs of our communities that are continuously dismissed - even with the presence of infrastructure in their neighborhoods.

While we were hopeful about the original design of the network running through Los Angeles, it seems our input and public comments are no longer impacting the design of these routes.

The Gateway Cities region has spent nearly two years working on their project design based on the previous Middle Mile project routes. These route changes were implemented

with no prior notice, and with no regard for the preexisting project planning that was created by the previous map. Since the new plan was released, there has not been an opportunity to provide input from the localities this open access middle mile network is meant to serve. This has left communities scrambling to re-configure their broadband infrastructure plans, including plans to apply for Federal Funding Account last mile grants, due on September 29, 2023; resulting in a cascading disinvestment in our region's lowest income communities.

**Therefore, I am writing to you to request the following two actions:**

- 1. Put a 30-day hold on implementation of the state's new Open Access Middle Mile Network plans to allow for input and discussion with communities on the impacts of the changes made; and,**
- 2. Reinstate the Gateway Cities included in the April 22nd map that were removed in the new Open Access Middle Mile Network planned routes.**

Prioritizing unconnected and under connected communities in your efforts to eliminate the digital divide would not only create equal opportunities for all, but also pave the way for a more inclusive and prosperous future for our region. As your partners and constituents in this initiative, we hope to identify a solution to ensure that the local planning our leaders have already done and foundation they've already laid, based on expectations from working with the state the past year and a half, is not wasted.

As other urban communities across the state are also elevating, these maps prioritize demonstrably served communities that already enjoy multiple options for affordable high-speed internet due to decades of private broadband investment. The need for Middle Mile investment in underserved communities only increases in importance with the upcoming Federal Funding Account allocation and other imminent state and federal broadband grants. Reformation begins with working with community leaders in the areas we know are the least connected, and historically redlined urban areas.

For these reasons we encourage you to reconsider now ineligible communities and avoid leaving our constituents out of this once in a generation opportunity. If you have any questions, please contact our City Manager John Moreno at (562) 220-2200.

CITY OF PARAMOUNT



Isabel Aguayo  
Mayor

CC. Honorable State Senator Lena Gonzalez, 33rd District  
Honorable Assembly Speaker Anthony Rendon, 62nd District  
Kristine Guerrero, Regional Public Affairs Manager, League of California Cities  
Jorge Morales, Legislative and Governmental Affairs Consultant, California Contract Cities Association