



Vermont Community Broadband Board

Summary of Public Input on Vermont's Digital Equity Plan

January 25, 2024





Introduction

As part of the [Internet for All](#) programs funded by the National Telecommunications and Information Administration (NTIA) to help states increase broadband and technology availability and adoption, Vermont developed its first-ever statewide Digital Equity Plan. To the shape this strategic plan, the Vermont Community Broadband Board (VCBB) has provided several opportunities for public comment. This document provides a summary of that process and the results.

The VCBB is deeply appreciative of the time and effort its partners, stakeholders, and communities have contributed to make the Digital Equity Plan as strong as possible.

Mechanisms for Stakeholder Engagement

The VCBB sought comprehensive input and feedback from diverse stakeholders through various mechanisms, summarized in Table 1.

Table 1. Mechanisms for Public Input

Engagement Mechanism	Stakeholders Reached Includes
Bi-weekly Digital Equity Core Planning Team meetings	State agencies and nonprofit organizations providing social and digital equity-related services statewide
Broadband workforce development working group	Department of Labor, technical colleges, workforce development organizations, labor organizations, adult education institutions
Participation in other equity-related working groups	Other state agencies, Black, Indigenous, People of Color affiliation groups
Targeted engagement and partnerships	Nonprofits, community anchor institutions, representatives of Covered Populations, civil rights organizations
Liaison with CUDs and ISPs	CUDs, Internet service providers
Public requests for input and public comment periods	General public
Public listening sessions	General Public
VCBB Board meetings	VCBB Board, general public



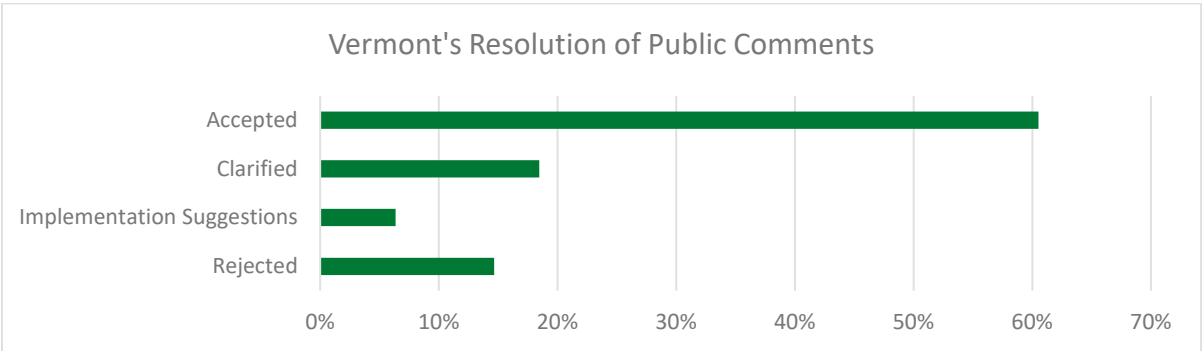
Engagement Mechanism	Stakeholders Reached Includes
Grassroots outreach with Community Action Partnership agencies	General public, Covered Populations
Focus groups	Covered Populations

Feedback Received and How It Has Informed the Plan

Vermont’s vision for digital equity was developed with the Digital Equity Core Planning Team. Extensive stakeholder engagement during the development of Vermont’s Broadband Equity, Access, and Deployment (BEAD) Five-Year Action Plan as well as the VCBB’s request for input specific to Digital Equity (26 responses) informed the early design of the draft Digital Equity Plan, including the assessment of needs, asset inventory, and some of the goals and objectives. The VCBB engaged the Digital Equity Core Planning Team for input on the first concepts and drafts of each section of the Digital Equity Plan. Meetings with approximately 55 organizations directly informed the plan’s development.

The draft Digital Equity Plan was released for public comment from December 1, 2023, to January 8, 2024. A total of 15 organizations and individuals submitted formal comments, including NTIA. The comments were comprehensive, providing valuable direction to strengthen the draft plan. Below is a summary of the quantity of comments received and the themes and how the VCBB resolved them (Figure 1). The VCBB accepted and incorporated most suggestions. Some comments informed revisions to improve clarity but were not directly accepted. Comments that were “rejected” were not incorporated because they conflicted with federal program requirements or for editorial reasons. Other comments were helpful considerations for Vermont’s work-planning and implementation phase but did not warrant revisions to the plan.

Figure 1. Vermont's Resolution of Public Comments





Below is a summary of themes within the public comments and how the VCBB resolved the feedback into the Digital Equity Plan:

- ▶ *Purpose of the document and alignment with BEAD:* Several comments reflected a need for further clarity regarding the purpose of the document, particularly how it relates to the BEAD program. **Resolution:** The VCBB added more context to the plan to explain its purpose, its audiences, and its function including that it is separate but aligned to the BEAD Five-Year Action Plan. The Digital Equity Plan is broader than broadband access and defines an aspirational vision for digital equity across the state. The Digital Equity plan does not place any requirements or obligations on organizations beyond the VCBB. It is a high-level strategy that will set the direction for detailed work planning and budgeting. Resources have not yet been confirmed for implementation, and the VCBB plans to work collaboratively with partners to detail the work plan.
- ▶ *Affordability:* Affordability of broadband service is a topic of concern for individuals and for broadband service providers, for different reasons. Some individuals are concerned broadband costs are too high. Some providers are concerned that the State of Vermont plans to regulate prices and/or require low-cost options, which could impede business viability to provide service at all. **Resolution:** No substantive changes were made to the plan on this topic, but several points were clarified. Regarding concerns of Vermont households' ability to afford broadband service, this challenge is described in detail in the plan and both BEAD and Digital Equity programs are designed to connect Vermonters to resources to help address this barrier. The VCBB did add that, while there are global standards set (described in the plan) for how much broadband service should cost in relation to one's household income, what is considered "affordable" is subjective to the individual. Regarding concerns some Internet providers expressed, the plan does not impose any requirements on broadband service providers. As the Digital Equity Plan states, the VCBB will work with Vermont stakeholders and the Vermont State Legislature to implement and promote resources for broadband and device affordability and adoption to Vermonters.
- ▶ *Barriers to digital equity:* Suggestions and information regarding socio-economic inequities that inform the context and barriers to digital equity in Vermont, and suggestions of specific barriers and resources for certain Covered Populations. **Resolution:** The VCBB worked to incorporate suggestions provided as well as to draw from information gathered in focus groups with specific Covered Populations to bolster the assessment of barriers to digital equity with both data and testimonials of lived experiences.
- ▶ *Overlap between goals:* Overlap between some of the goals and objectives. **Resolution:** The VCBB incorporated the objectives, activities, and key



performance indicators related to a sixth goal in the draft for public comment, which was focused on broader socio-economic impact, into other relevant goals, reducing the total number to five goals and improving the implementation strategy to be simpler and more streamlined.

- ▶ *Public survey data:* Requests for additional detail on the respondents of the VCBB's public survey, which informed the baselines for this plan. **Resolution:** The VCBB added some context in the beginning of the plan, adding to what was already in the document's Appendix. Data on the geographic distribution of survey respondents was not collected due to privacy concerns and therefore could not be added to the Digital Equity Plan.
- ▶ *Quality of baseline data:* Dissatisfaction with the availability of high quality and standardized data to inform and compare the baselines. **Resolution:** This challenge is not unique to Vermont—many of the indicators of digital equity specific to Covered Populations are not consistently measured today. The VCBB has taken a thoughtful approach to using primary and secondary sources to inform its assessment of the current state of digital equity and the design of its KPIs. A key priority, as already stated in the Implementation Strategy, will be to establish a strong data collection and management platform and a mechanism for public visibility and accountability.
- ▶ *Federal program requirements:* Some comments the VCBB did not incorporate related to misunderstandings of definitions or program requirements from NTIA or the Federal Communications Commission.

The VCBB appreciates the thoughtful and thorough public comments it received. These comments have strengthened the quality of the plan. This will not be the end of stakeholder engagement. The VCBB plans to take an inclusive, transparent, and adaptive approach to ensure accountability to Vermonters and to maximize impact.