

Title	0011	11/02/2023
	by Karisa Tashjian in Digital Equity Public Comment (English)	id. 44596281
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If you are affiliated with an organization, please provide the organization name	Digitunity
If you are affiliated with an organization, please share a brief paragraph about your organization and its work in promoting digital equity	<p>Digitunity is working to make owning a computer possible for everyone. For nearly 40 years, Digitunity and its predecessor organization, National Cristina Foundation, have been advancing digital equity through device ownership. To achieve its mission, Digitunity commits its time, expertise, energy, and influence to:</p> <ul style="list-style-type: none">Cultivate a ready and robust supply of free or low cost computers to support digital inclusion;Establish or bolster local systems of distribution; andDevelop and apply knowledge that leads to inclusive systems change. <p>A fully remote, national nonprofit organization, Digitunity is based in New Hampshire and has team members and trusted contractors located across the United States. The Digital Opportunity Network, Digitunity's national alliance of community-based organizations united in the pursuit of digital equity, can be found in over 1,500 locations around the country.</p>

If affiliated with an organization, please provide a link to website

www.digitunity.org

Who is your main point of contact if we have further questions? Please provide their name and the best method to communicate with them if they are not the commentor on this form

Karisa Tashjian

Is there any additional background information you would like our office to know?

We are happy to provide more detailed feedback for the device portion of the digital equity plan. We are also available to help through our advisory services in implementation.

Please rank the Kansas digital equity plan on how it accomplishes the following:

Question 1: Outlines the current state of digital equity in Kansas

Well

Question 2: Outlines a vision for digital equity in Kansas that recognizes the state's unique social and economic circumstances

Very well

Question 3: Identifies the barriers to digital equity faced by each of the state's covered populations

Very well

Question 4: Establishes an implementation strategy to achieve digital equity

Well

<p>Question 5: Describes how Kansas will coordinate and conduct outreach amongst digital equity partners and stakeholders</p>	<p>Well</p>
<p>Question 6: Describes how Kansas will coordinate its use of DEA funding with any funds it will receive in connection with BEAD or other digital equity funding</p>	<p>Very well</p>
<p>Question 7: Identifies the assets available to help connect Kansas' covered populations</p>	<p>Well</p>
<p>Question 8: If there are any digital equity assets that you feel have not been listed in the digital equity plan, please list them here</p>	<p>Looking at the need for supply for the device component of the plan, it will be helpful to understand the current supply of technology in the state as well as key businesses that could be approached for donating their technology. We'd also be interested to understand which organizations work directly with the Covered Populations and could be considered as deployment sites for devices.</p>
<p>Question 9: Please indicate which sections of the Kansas digital equity plan you are providing comment on</p>	<p>Section 5: Implementation Section 4: Collaboration and Stakeholder Engagement Other section not listed or general comments</p>

Please provide comment on Section 4: Collaboration and Stakeholder Engagement

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

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

Please provide comment on Section 5: Implementation

Kudos!: We're happy to see the inclusion of the goal of expanding "access to affordable devices with accommodating technical support" as well as acknowledging that "mobile devices do not provide users with the full digital experience allowed by personal computing devices."

Supply is critical: Generating a robust and ongoing supply of technology to be refurbished is necessary for a sustainable device ecosystem. This supply can be generated through donations from individuals, corporations, government and other organizations. In December 2022, Digitunity helped to pass the federal Computers for Veterans and Students Act which will soon direct repairable, out of service federal computers to nonprofit technology refurbishers. Kansas can be a potential beneficiary of this program. Efforts such as a statewide campaign for businesses donations will be extremely helpful to the state's efforts. Digitunity has deep knowledge on generating supply.

Refurbishing: Refurbishing is a key component of a device ecosystem and necessitates a strong emphasis on technical skills and expertise, particularly to guarantee the secure handling of data. It also requires working with certified vendors to ensure that e-waste is responsibly handled and that the entire process is financially viable. It is important to understand the capacity, scalability, and quality of service that refurbishers can provide. We caution against identifying any single vendor, whether nonprofit or for-profit, as the statewide refurbishing solution. A sustainable device ecosystem leverages a broad range of assets to serve community members best. Digitunity stands ready to assist, leveraging the role we play in administering a national practitioner network that includes 90 nonprofit refurbishers. Digitunity can support both with technical knowledge of refurbishing as well as our deep familiarity of the wide range of business models and practices found within our practitioner network.

Workforce opportunity: Refurbishing computers is a viable workforce development program with a low entry point for staff and a robust career ladder to family sustaining wages, and 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.

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

ACP: A note of caution regarding relying too heavily on the ACP subsidy for device access. Use of device subsidy is reliant on the internet service provider offering a device, and, if they do, they are often low quality tablets with limited features.

Technical support: We applaud the inclusion of technical support of devices in the plan, however, it is important to distinguish technical support from digital skills support. Library staff and Digital Navigators may not be equipped or even permitted to provide in-depth technical support. Technical support is a specialized customer service function that addresses complex technical issues beyond the scope of standard help desk assistance. It plays a crucial role in resolving technical problems, providing hardware repair services, offering warranty support, and troubleshooting intricate hardware-related failures. Technical support professionals are highly skilled individuals with expertise in various technical domains. Their primary responsibility is to assist users in resolving intricate technical challenges and ensuring the smooth operation of their devices. New computer users and owners often face a digital skills gap in using the computer which does not require technical support but rather skills support. We recommend looking at device supply sources as the first stop for technical support.

Please provide comment on any other section not listed, or provide general comments on the digital equity plan

Digitunity has developed and utilized a longstanding online technology donation matching platform that connects the supply of new and refurbished devices to vetted community organizations for deployment. We'd be happy to share more about this with the state and how it can be used to connect various parts of your ecosystem, gather and integrate data, and make the process efficient.

By submitting this form for public comment and evidence to support your comment, you are accepting responsibility for the accuracy of the information submitted and that it is true and correct to the best of your knowledge. You agree to be contacted by the Kansas Office of Broadband Development, Kansas Department of Commerce should the need arise. Furthermore, by making this submission, you understand that Kansas Department of Commerce and the Office of Broadband Development reserve the right to publicly publish your comment and evidence provided. Falsification of information will result in rejection of future public comment submissions and could result in legal action. Please type your name and today's date in the text box below.

Karisa Tashjian, 11/2/23