
Title	0014	11/02/2023
	by Anna Brugmann in Digital Equity Public Comment (English)	id. 44597857
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If you are affiliated with an organization, please provide the organization name	Rebuild Local News
If you are affiliated with an organization, please share a brief paragraph about your organization and its work in promoting digital equity	Rebuild Local News is a coalition of 30+ local journalism organizations, trade association and local journalism advocates. We represent digital only publications, nonprofit newsrooms, legacy print newspapers, the legacy Black and Hispanic press, unions and other groups invested in a strong local press. Together, we advocate for smart public policies to support the future of the local press and sustain democracy. We believe Kansas has a significant opportunity to both support the continued development of a robust local press in Kansas while also pursuing broadband access and digital equity. We are joined with our Kansas partners, including the Kansas Press Association, which represents 190 newspapers and digital news sites in the state of Kansas. These comments are also co-signed by newspapers that serve Harvey and Johnson counties.
If affiliated with an organization, please provide a link to website	https://www.rebuildlocalnews.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

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

Rebuild Local News has deep ties with our Kansas partners. This letter was written in close partnership with the Kansas Press Association and informed by outreach to several Kansas local newsrooms, including commercial print, nonprofit newsrooms and others. For more information on digital equity, broadband access and local news, you can read Rebuild Local News' proposal to the Commerce Department at: <https://www.rebuildlocalnews.org/solutions/broadband/>

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

Well

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

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>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>Local newsrooms including local newsrooms reaching covered populations, such as rural weekly newsrooms, nonprofit newsrooms, members of the Black and Latino/Hispanic press as well as hyperlocal digital-only outlets that are filling critical information gaps among Kansas residents. These outlets will be critical partners to increasing awareness of broadband resources, but also components of digital equity themselves as they pursue objectives that enhance the civic and economic participation of Kansas residents.</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 Section 3: Current State of Digital Equity: Barriers and Assets</p>
<p>Please provide comment on Section 3: Current State of Digital Equity: Barriers and Assets</p>	<p>We collectively applaud your detailed and ambitious efforts to bring universal broadband to the Sunflower State. However, we ask that you call out local news organizations as trusted partners in advancing digital equity programs as well as in your inventories as trusted partners and/or anchor institutions. As news organizations, our members are not only invested in these efforts as they work to inform their communities, but are, themselves, key partners in advancing the objectives of universal broadband and digital equity.</p> <p>We encourage the Kansas Office of Broadband Deployment to consider the role news organizations play in advancing digital literacy, adoption and</p>

access programs. For example, Lindsey Young is the co-publisher of Harvey County Now, a paper based in Newton, Kansas that serves the surrounding rural area. She developed an online learning program that teaches community members how to be local reporters, including the digital skills journalists need, but that citizens also need to vet and find critical information online. Similarly, the Wichita Foundation is launching a program that will train community members to report on public meetings. The program will build digital and information skills while also facilitating opportunities for Wichita residents to be active civic participants, all of which are key elements of digital equity. These programs could be scaled throughout Kansas, or even slightly adapted to incorporate broader digital literacy skills. This kind of investment in newsroom partners would have positive job impacts, not only helping Kansans develop critical digital literacy skills, but also helping local news organizations train qualified community members to work for their outlets. Moreover, if news outlets were granted “trusted community partner” status, they could build on the trusted relationship they have with their community, partnering with other community institutions such as public libraries or schools to implement digital literacy programs like the one described above and more.

In addition, the Kansas Office of Broadband Development (KOBBD) reports barriers to accessing broadband by demographic. Low awareness of broadband affordability programs was among the barriers most often listed by those who are low income and those who report a language barrier. Local news can be critical partners in increasing awareness of broadband programs, particularly news outlets that serve Spanish-speaking or low-income communities. The state of Kansas should not only see these local news outlets as partners in advancing broadband objectives in hard-to-reach communities, but place advertisements in those news outlets. Such a strategy would not only support the news organization via advertising revenue, but reach broader audiences who tend to trust local news outlets. In the context of Broadband Equity, Access and Deployment programs, sub-grantees should be required to prioritize advertising in local media - whether that be a local newspaper, an outlet that serves the Black community in Kansas, a Spanish-language publication, digital-only newsroom, public radio station or local nonprofit newsroom - to alert residents of new services or programs in their area. National research shows local news outlets are consistently the most trusted source of information across age groups. In vetting the marketing plans of BEAD sub-grantees, the KOBBD should prioritize advertising plans that include local news placements, thereby leveraging the trust local communities have in their local news outlets.

Please provide comment on Section 4: Collaboration and Stakeholder Engagement

Please provide comment on Section 5: Implementation

Digital equity describes the conditions in which residents have 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 voter turnout, less competitive elections, fewer residents informed about their Congressional representation and less likelihood of even Googling the mayor. But it doesn't stop there. A journalist who studied successful news outlets in West Virginia wrote, "There is an undeniable correlation between a strong local news product and a persevering local business dynamic." One expert even told Rebuild Local News building out broadband access without also shoring up local news is like providing "high speed access to garbage" because the vacuum left by local news is often filled with politically-motivated information, polarizing nationally-focused content or social media heresy.

To that end, we encourage KOBd to consider ways to use digital equity dollars to strengthen local news outlets. For example, local news outlets themselves, particularly those in rural areas, also lack high speed broadband access. The Kansas Broadband Equity, Access and Deployment plan already documents the effects of poor broadband access on small businesses. Page six of the BEAD plan, small businesses report paying high rates for poor broadband services, making it difficult to grow their business. Businesses also reported poor broadband services negatively affecting the level of service a business could offer residents and customers. Poor broadband service, the plan said, "hinders business and economic growth in rural and economically distressed areas."

This feedback is reenforced in the Digital Equity Plan. Although this is focused on business generally, the same could be said for local news outlets specifically, many of which are small businesses themselves. News outlets that serve rural communities, in particular, likely suffer from poor broadband services that both decrease their ability to reach their audience, but also to develop revenue streams like digital advertising or digital subscriptions. KOPD should consider projects that enhance the digital infrastructure and workforce capacity within newsrooms, such as a grant program for 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 by better serving the wider community. It would ensure that local news would be waiting for residents as they access greater broadband services, serving both the economic objectives of broadband access and digital equity as it relates to the local newsroom, as well as the civic objectives of digital literacy, as it relates to citizens' access to local news.

The most ambitious use of digital equity funds would be to proactively meet the civic needs of increasingly-online communities by investing in local reporting in areas that have been historically un- or under-served by broadband. These funds could go to a press association, public institution or even directly to newsrooms - whether they be public radio, commercial print or nonprofit - to increase reporting and engagement around public affairs in communities.

It's true that projects like the one described above would be compatible with the current and Digital Equity plan, but if local newsrooms, organizations that serve local newsrooms, like state press or broadcast associations, or even academic institutions with partnerships with local

newsrooms, are not called out in the plans it's less likely that the sector will see itself within the framework of digital equity and broadband access.

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.

Anna Brugmann 11/02/2023