

DECLARATION OF GWEN MOORE

1. My name is Gwen Moore, President CEO of GeM Communications Group. I proudly served as an elected Assembly member in the California State Legislature from 1978 to 1994 representing the 49th District. During the time I served as an Assembly member, I chaired the Utilities and Commerce Committee for 12 years, During that time I authored the Moore Universal Telephone Service Act (the "Moore Act") which passed into law in 1987.
2. The purpose of the Moore Act was to ensure that high-quality basic telephone service at affordable rates to the greatest number of citizens is available. The Act put into California law a means to achieve universal service by making basic telephone service affordable to low-income households through the creation of a LifeLine class of service. The Act also instructed the California Public Utilities Commission ("Commission") and telephone providers to ensure that every household qualified to receive LifeLine telephone service is informed of and given the opportunity to subscribe to that affordable telephone service. Finally, the Act provided that the furnishing of LifeLine telephone service is in the public interest and should be supported fairly and equitably by every telephone company and the Commission was responsible for the administration of the program. Since the Moore Act was passed 33 years ago in 1987, an era well before Internet usage being available to the general public, it did not include advanced information technologies like broadband.
3. I am providing this declaration to provide support to the position of the parties such as the California Emerging Technology Fund and others that are advocating for the addition of broadband Internet access service ("broadband") to the California LifeLine program. I understand that some broadband providers have objected to this proposal, arguing that the Moore Act requires single-minded focus -- or prioritization -- on the provision of only basic telephone service. Also, some parties including the largest telephone companies and some of the large cable providers have argued that offering broadband should be on a voluntary basis only.
4. At this point 33 years after the Moore Act passage, it is my opinion that broadband has become an essential utility for residents to obtain necessary services: perform work; participate in distance learning; obtain health care and information; look for employment;

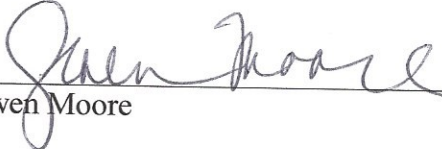
apply for higher education; express their political views; and participate in society and the economy. In my mind, without question, it is time that the LifeLine program acknowledge the central role broadband plays in our economy and our society and enable disadvantaged, low-income communities to obtain this essential utility. Thus, along with continuing support for voice service, I urge this Commission to immediately add broadband as a supported service option in the LifeLine program, not only for wireless providers but also for wireline providers like the incumbent telephone companies and the cable providers, all of whom provide the bulk of the wireline broadband services in the state.

5. For statutory support, I suggest that the Commission refer to California Public Utility Section 281(a) which established the California Advanced Service Fund and provides grants for rural broadband infrastructure and broadband adoption grants for those who are unconnected to the Internet. In that Public Utilities code section, the Legislature encouraged this Commission to deploy “high-quality advanced communications services to all Californians” including “the substantial social benefits of advanced information and communications technologies.” The reference to “all Californians” provides legal support for bringing broadband to participants of the California LifeLine program. Further the reference to “advanced information” technologies clearly encompasses broadband service. In my mind, this indicates a clear direction to this Commission to make advanced communications services available to all, which includes our most disadvantaged, low-income residents. This should include modern advanced information technologies such as broadband, and not be limited to dated traditional telephone technology.
6. In 2016, the Federal Communications Commission (FCC) has already added broadband to the federal Lifeline program. In doing so, the FCC found that like telephone service in the last century, a broadband connection has become an essential tool for participating in the 21st Century economy. What is California waiting for? The Commission should follow the FCC’s lead, while ensuring that the values of our state of inclusion, affordability, and digital equity are upheld. There is ample data showing low-income households do not connect to the Internet due to affordability, lack of digital literacy, and the lack of a computing device.

7. In closing, I point out that in light of the current pandemic emergency which may extend a number of months if not years, the disparity in Internet access at home has made the misery of the current situation far worse for those who are unconnected to the Internet. For the unemployed with school age children, a home Internet connection is a must for job search, for the children to connect to their teachers for home distance learning, and to obtain health information and instructions from the government during this serious health emergency. A mere telephone connection is inadequate for these functions. Connectivity and computer devices are essential for low-income persons during this unprecedented time. It is further well reported in the press that the pandemic has disproportionately impacted low-income persons and people of color.
8. I hereby make this declaration in support of the position by the California Emerging Technology Fund and others supporting adding broadband to the LifeLine program. I offer this declaration based on my own personal knowledge. I have conducted sufficient due diligence to be informed regarding these facts based on information from individuals from CETF with personal knowledge, I believe the facts presented in this Declaration are true and correct.

I declare under penalty of perjury that the facts represented herein are true and correct.

Executed this 25 day of June, 2020, at Los Angeles, California


Gwen Moore