To the Broadband Development Office:

Thank you for publishing the Strategic Plan Blueprint for comment.
Human-I-T is a nonprofit that has spent 14 years shrinking the digital divide. We refurbish computers retired by businesses and pair them with low cost internet, digital skills training and tech support for low-income households, serving all 50 states, including Texas.
I also write with a state office perspective: before joining Human-I-T, I served as Arizona's Digital Equity Program Manager at the Arizona Commerce Authority, where I helped build the state's Digital Equity Plan and stand up its Capacity Grant Program.
Our comments focus on Section 5, Adoption and Public Resource Access, and on one measure in Section 7.

1. A connection produces a return only if the household can use it.
The Blueprint sets the right test: infrastructure built with public money has to be used. In our work, a device without internet sits unused, and internet without a device or skills goes underused. An independent 2025 study by 60 Decibels found that 66% of the people we serve had never had access to services like ours before. A phone helps, but it doesn't work well for a job application, homework or a telehealth visit with forms to complete. We encourage the final plan to name device access and basic digital skills as conditions for adoption in Section 5, and to include them in the public safety, education and health needs assessment.

2. Measure why households don't subscribe, not only whether they do.
The adoption KPI tracks the change in subscription rates after construction. That shows whether adoption is lagging, but not why. Pairing it with a measure of household device ownership in newly served areas, drawn from existing survey data where possible, would show whether low uptake is a price, device or skills problem and point the response to the right fix.

3. Refurbished devices meet the Blueprint's own test for future spending.
Section 4.5 says any future use of non-deployed BEAD funds must deliver measurable value the private market isn't already delivering, avoid recurring obligations, and show a meaningful return. Device refurbishment fits that test. It runs on technology businesses have already paid for and retired, so it doesn't duplicate private investment. A device is a one-time cost with no recurring state obligation. And cost per household equipped is easy to measure and publish on the dashboards the office already plans. Even without new funds, the office

could encourage state agencies to route retired computers, once securely wiped, to refurbishment for residents of newly connected areas rather than to recycling.

4. Include digital inclusion practitioners in regional engagement.
The regional work groups, COG points of contact and Texas Regional Broadband Program toolkits are good vehicles for adoption work. Libraries, community action agencies, workforce boards and nonprofit device and digital navigation providers see adoption barriers first-hand, and including them would help the office meet its statutory direction on adoption and affordability. The plan to optimize state portals and telehealth platforms for community navigation would also go further with these partners, since a portal helps only a resident who can reach it.

Since 2012, Human-I-T has distributed over 700,000 devices and diverted over 27 million pounds of electronics from landfills, with NAID AAA certified data destruction. We would welcome the chance to share what we've learned with the BDO or a regional work group.

Thank you for the opportunity to comment.

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