SHINING LIGHT CONSULTING

Public Comments on the Texas Broadband Development Office 2026 Strategic Plan Blueprint

Submitted to: Texas Broadband Development Office
Texas Comptroller of Public Accounts

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Subject: Preserving Texas's Broadband Investments Through Continuous Digital Opportunity Research, Regional Engagement, and Measurable Outcomes

Dear Broadband Development Office Leadership:

Shining Light Consulting (SLC) appreciates the opportunity to provide comments on the Texas Broadband Development Office's (BDO) 2026 Strategic Plan Blueprint.

We support the Blueprint's emphasis on fiscal responsibility, transparent decision-making, efficient infrastructure deployment, provider accountability, and measurable returns on taxpayer investment. These priorities are essential to delivering broadband infrastructure that meets Texas's needs.

We encourage the BDO to apply those same principles to understanding whether Texans can afford, adopt, and meaningfully use that infrastructure.

Texas has already invested substantially in identifying underserved communities and documenting barriers to digital participation. The next step is to preserve that knowledge, continuously improve its measurement, and use emerging evidence to guide implementation and evaluate results.

SLC Background and Relevant Experience

Shining Light Consulting is an Austin-based public affairs and strategic consulting firm specializing in digital opportunity, technology policy, workforce development, government relations, community engagement, and cross-sector partnerships.

Our recommendations draw upon the experience of SLC Founder and Principal Nehemiah Pitts III, who served more than eight years on the City of Austin's Community Technology & Telecommunications Commission (CTTC), including five years as Chairman.

During his chairmanship, Mr. Pitts participated firsthand in the BDO's foundational broadband planning and regional stakeholder outreach, including activities documented in the *2022 Texas Broadband Plan*. He also participated in regional digital equity research and community engagement associated with development of the Texas Digital Opportunity Plan (TDOP).

His leadership included advancing collaboration through the Digital Empowerment Community of Austin (DECA), an active network of public institutions and community partners working to strengthen digital inclusion.

Through SLC, he has continued this work in digital opportunity policy, regional coalition development, stakeholder engagement, and strategic partnerships.

This sustained involvement informs our recommendations for building upon Texas's existing research, regional relationships, and institutional capacity.

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1. Preserve Existing Research and Establish a Living Digital Opportunity Survey

Relevant Blueprint Sections: 1, 3, 5, and 7

Texas Has Established the Foundation—But Not a Complete Measurement of Need

Texas's *2022 Broadband Plan*, subsequent TDOP, and complementary regional assessments represent substantial investments in understanding the digital divide.

The 2022 Broadband Plan incorporated extensive statewide engagement, including 12 public town halls, 66 regional and statewide stakeholder roundtables, 70 direct interviews, and 16,241 public survey responses.

The TDOP expanded that foundation through covered-population research, statewide surveys, regional engagement, and assessments of digital opportunity barriers.

These efforts established substantial documented needs involving broadband availability, affordability, adoption, digital skills, devices, accessibility, and meaningful participation in essential online services.

However, from the earliest stages of Texas's broadband planning, participating community stakeholders questioned whether conventional research and outreach methods could adequately capture the experiences of Texans facing the greatest barriers to digital participation.

Concerns about the limitations of existing research were raised during BDO government stakeholder roundtables and continued through BDO community roundtables, reflecting a persistent call for more comprehensive and inclusive research into Texas's digital divide.

The TDOP's 2023 Digital Opportunity Survey ultimately recorded **11,385 valid responses, including 9,440 online and 1,945 paper submissions**.

For a state with more than 30 million residents, the relatively limited paper participation reinforced longstanding concerns about reaching Texans experiencing significant digital barriers. While these figures alone do not establish statistical underrepresentation, they underscore the importance of understanding whose experiences are reflected in the research and whose may remain undocumented.

The very barriers Texas seeks to measure can make affected residents difficult to reach through the methods used to measure them.

Expanded outreach and regional research improved the state's understanding, but no finite survey or series of engagements could exhaustively document a problem as geographically diverse and dynamic as Texas's digital divide.

Population Growth Makes Continuous Research More Important

Texas's population has continued to increase since the original outreach concluded. According to U.S. Census Bureau estimates, the state reached approximately **31.7 million residents in 2025**.

Growth, migration, changing household circumstances, evolving technologies, and shifting affordability conditions mean that research collected in earlier planning periods cannot be treated as a permanent or exhaustive account of today's digital opportunity needs.

This does not diminish the value of previous findings. It establishes the need to keep them current.

Regional Research Adds Essential Context

The *2023 Travis County and City of Austin Digital Equity Needs Assessment* demonstrates the value of research designed to reach people whose circumstances may be obscured in statewide datasets.

Supported by the St. David's Foundation, the assessment collected 1,382 survey responses and incorporated community circles, nonprofit collaboration, advisory workshops, and public engagement. It documented

affordability and digital skills as leading barriers, alongside service reliability, device access, accessibility, consumer protection, and trust.

These challenges persisted even within a metropolitan region with comparatively strong broadband infrastructure.

Travis County and City of Austin Digital Equity Needs Assessment
Full report: https://www.traviscountytx.gov/digital-equity

The assessment provides valuable regional evidence that complements statewide research. Its geographic scope and research period also demonstrate why such findings should contribute to an expanding evidence base rather than be treated as a final measurement of need.

The central issue is not whether Texas has identified underserved communities or established substantial digital opportunity needs. It has. The issue is how the state will continue measuring the extent of those needs, discovering what remains undocumented, and determining whether conditions improve.

Fulfill the TDOP's Existing Commitment to a Living Digital Opportunity Plan

The BDO has already established the policy foundation for this recommendation. The Texas Digital Opportunity Plan committed to maintaining a *Living Digital Opportunity Plan*, recognizing that digital opportunity planning requires continuing research, engagement, and evaluation.

SLC's principal recommendation is to **operationalize that existing commitment** through a Living Texas Digital Opportunity Survey and Community Evidence Framework.

Rather than launching another disconnected planning initiative, the BDO should establish an ongoing measurement function that preserves existing research, integrates regional knowledge, expands quantitative and qualitative evidence, and connects updated findings directly to implementation and accountability.

A living survey should be more than a permanently available online questionnaire. It should combine recurring research, accessible participation, regional evidence, and consistent reporting to produce an increasingly complete understanding of digital barriers and changing conditions.

We recommend five operational components.

A. Preserve and integrate existing evidence

Establish a consolidated inventory of relevant findings from the 2022 Broadband Plan, TDOP, and regional assessments. Preserve their methodologies, geographic coverage, limitations, and baseline measures.

Where practical, make existing findings accessible through a common reporting framework rather than requiring partners to repeat research already completed.

B. Expand quantitative and qualitative measurement

Conduct recurring surveys with consistent baseline questions, supplemented by appropriate administrative data, regional assessments, and other numerical indicators.

Equally important, incorporate firsthand community experiences, documented service barriers, interviews, and observations from organizations already serving digitally disadvantaged Texans.

Numerical findings help establish patterns and changes over time. Qualitative findings provide context that can explain those patterns and reveal barriers not adequately captured by standardized questions.

These sources should complement one another without treating voluntary responses or anecdotal accounts as statistically representative findings.

C. Reach people whom conventional research may miss

Retain accessible online, paper, telephone, and in-person participation methods, including multilingual and disability-accessible options.

Use existing research to identify gaps in geographic coverage and participation among populations already known to experience digital barriers. Work with trusted community institutions to reach those who may be difficult to engage through centralized online outreach.

The objective should not simply be a larger response count. It should be improving the quality, coverage, and usefulness of the evidence.

D. Make regional engagement part of the research process

Establish a consistent way for councils of governments, libraries, educational institutions, local governments, nonprofit organizations, and other regional partners to contribute relevant findings.

The BDO's proposed regional liaisons and continuing stakeholder engagement provide a practical foundation for this work.

Community organizations should not need to wait for another major planning cycle to communicate changing conditions or emerging barriers.

E. Connect research to implementation and accountability

Use the framework to inform broadband adoption assessments, regional priorities, public resource needs, and strategic performance measures.

Publish periodic summaries showing what new evidence has been collected, where gaps remain, which conditions are changing, and how findings have informed implementation decisions.

Protect respondent privacy, apply appropriate quality controls, and clearly disclose the limitations of each data source.

A Practical, Phased Implementation Approach

We recommend an implementation sequence that respects the BDO's fiscal and administrative responsibilities:

Initial phase — Establish the foundation. Designate responsibility within the BDO; inventory existing datasets and regional research; identify comparable indicators, gaps, and available partners; and establish a baseline reporting framework.

Next phase — Begin recurring measurement. Integrate existing data sources, provide accessible opportunities for additional responses, and establish processes for receiving regional quantitative and qualitative findings.

Continuing phase — Measure and act. Publish periodic updates, evaluate changing barriers and research coverage, and document how findings inform adoption assessments, regional engagement, and strategic decisions.

This phased approach can begin through existing planning, research, and partnership mechanisms, with expansion evaluated according to available resources and statutory authority.

Specific requested addition: Incorporate a Living Texas Digital Opportunity Survey and Community Evidence Framework into Sections 3, 5, and 7 of the final Strategic Plan, with a designated responsible function, phased implementation milestones, recurring measurements, regional evidence-integration procedures, and periodic public reporting.

This would fulfill the TDOP's commitment to a living plan while improving the return on Texas's previous investments in research and community engagement.

2. Build Upon Existing Research to Measure Persistent and Emerging Digital Barriers

Relevant Blueprint Sections: 3, 5, and 7

The TDOP and complementary regional assessments have already identified populations experiencing substantial barriers to digital participation, including **low-income households, older adults, veterans, people with disabilities, rural residents, individuals facing language barriers, and incarcerated and formerly incarcerated individuals**.

Texas should preserve these findings rather than repeat the foundational work of identifying underserved populations.

The next priority is to measure the extent of unmet needs and monitor whether documented barriers are changing.

Geographic broadband availability alone does not establish whether a household can afford reliable service, obtain suitable devices, develop digital skills, or participate meaningfully in online activities.

SLC recommends that the BDO use existing statewide and regional findings to monitor affordability, adoption, accessibility, device access, digital skills, and meaningful use among already-identified populations.

Recurring research should be supplemented by firsthand community experiences and the knowledge of institutions serving these populations, with appropriate privacy protections and compliance with applicable state and federal requirements.

This is a recommendation for evidence-based measurement—not for new population-based funding preferences.

Specific requested addition: Incorporate findings concerning already-identified underserved populations into Section 5's needs assessments and Section 7's performance framework, with recurring measurement of persistent and emerging digital barriers.

3. Strengthen Adoption, Affordability, and Meaningful-Use Performance Measures

Relevant Blueprint Sections: 5 and 7

The Blueprint appropriately proposes measuring changes in broadband subscription rates following infrastructure completion.

SLC supports this KPI and recommends supplementing it with indicators that help explain whether new infrastructure is producing meaningful benefits.

Three categories should be distinguished:

- **Infrastructure performance:** Locations connected, verified service performance, costs, reliability, deployment milestones, and provider compliance.
- **Broadband adoption:** Subscription changes, service affordability, and barriers to obtaining or maintaining service.
- **Meaningful digital opportunity:** Device access, accessibility, digital skills, and the ability to use connectivity for education, employment, healthcare, and essential services.

For example, if adoption remains low following deployment, community evidence may help explain whether affordability, device limitations, service reliability, or other barriers contribute to the result.

Measures should have defined baselines and reporting intervals. Provider obligations should remain distinct from broader community outcomes influenced by multiple institutions.

Specific requested addition: Supplement Section 7's existing subscription-rate KPI with recurring affordability and meaningful-use indicators, informed where appropriate by the Living Digital Opportunity Survey.

4. Make Regional Engagement a Continuous Source of Research and Implementation Feedback

Relevant Blueprint Sections: 3 and 5

SLC supports the Blueprint's proposals for regional points of contact, stakeholder convenings, and ongoing public feedback.

The opportunity is to connect these existing commitments more directly to research and implementation.

Texas already benefits from established capacity through councils of governments, the Texas Regional Broadband Program, local governments, public libraries, educational institutions, workforce organizations, nonprofit organizations, and community-based service providers.

The Digital Empowerment Community of Austin illustrates the value of sustained collaboration among public institutions and community partners.

Rather than establishing duplicative structures, the BDO should develop consistent methods for receiving regional findings, incorporating appropriate evidence into its research framework, and reporting how stakeholder feedback informs strategic decisions.

Regional liaisons could help coordinate these functions while respecting existing institutional responsibilities.

Specific requested addition: Strengthen Section 3 by explicitly connecting regional engagement mechanisms to the Living Digital Opportunity Survey, implementation feedback, and periodic public reporting.

5. Apply Transparent, Evidence-Based Criteria to Infrastructure Investments

Relevant Blueprint Sections: 2 and 4

SLC supports the Blueprint's commitment to fiscal accountability, avoiding unnecessary infrastructure duplication, and ensuring measurable public value.

Section 4.2 raises questions concerning the future of the Texas Middle Mile Network and potential redirection of remaining resources.

Before reaching a program-wide determination, the BDO should distinguish projects duplicating adequate existing infrastructure from those addressing documented needs involving last-mile feasibility, affordability, reliability, network resiliency, or community anchor institutions.

We recommend transparent project-evaluation criteria that consider statutory requirements, existing private infrastructure, regional evidence, cost-effectiveness, and demonstrated public benefit.

These recommendations do not presume that any specific project should receive funding.

Specific requested addition: Clarify in Section 4.2 the evidence and criteria the BDO will use to determine whether remaining middle-mile investments should be retained, revised, discontinued, or redirected.

6. Connect Broadband Development to Education, Workforce, and Essential Services

Relevant Blueprint Sections: 4.4, 5, and 7

The Blueprint recognizes broadband's importance to education, public health, and public safety through its proposed needs assessments.

SLC supports these efforts and encourages coordination with existing educational, workforce, healthcare, library, and community institutions.

We also recommend distinguishing between:

Broadband workforce development, which prepares Texans for infrastructure construction, deployment, operations, and maintenance; and

Digital workforce readiness, which enables Texans to use connectivity, devices, and digital skills for education, employment, training, and entrepreneurship.

The BDO's broadband workforce investments address the first priority. The second can be supported through coordination with institutions already responsible for workforce education and related services.

The Living Digital Opportunity Survey could help identify recurring barriers to online learning, employment services, telehealth, and public resources.

Specific requested addition: Expand Section 5's coordination framework to connect broadband planning and needs assessments with existing education, workforce, healthcare, and essential-service institutions, without duplicating their responsibilities.

7. Strengthen Transparency, Accountability, and Continuous Improvement

Relevant Blueprint Sections: 2, 3, 6, and 7

SLC supports the Blueprint's proposals for public dashboards, grant transparency, provider performance verification, and financial oversight.

We recommend applying comparable transparency to the Strategic Plan's research and implementation commitments.

A public scorecard could distinguish:

- **Infrastructure results:** Deployment, service performance, costs, and compliance.
- **Adoption and community outcomes:** Subscription trends, affordability, device access, digital skills, and meaningful use.
- **Research coverage:** Participation, geographic coverage, evidence gaps, and new quantitative and qualitative findings.
- **Implementation accountability:** Responsible entities, milestones, regional engagement, and decisions informed by stakeholder evidence.

Reporting should disclose methodological limitations, distinguish representative data from voluntary responses and firsthand accounts, and protect respondent privacy.

The BDO should also publish a summary explaining how stakeholder comments informed the final Strategic Plan.

Specific requested addition: Supplement Section 7 with a public implementation scorecard identifying responsible functions, baseline measures, data sources, reporting intervals, and progress toward strategic commitments.

8. Preserve Fiscal Discipline and Flexibility as Funding Conditions Evolve

SLC supports the Blueprint's distinction between authorized funding commitments and federal resources whose future uses remain uncertain.

Continuous digital opportunity research should be designed to maximize existing investments rather than create unfunded obligations.

The initial implementation of the Living Digital Opportunity Survey should prioritize existing datasets, established regional relationships, and available planning and reporting resources.

Expansion requiring additional funding should be evaluated separately for statutory authority, eligibility, cost, and measurable public benefit.

Future federal opportunities should be assessed under their actual requirements and not presumed available.

Specific requested addition: Include a phased implementation approach that uses available resources first and permits additional research and engagement activities as funding and authority allow.

Conclusion: Three Priorities for the Final Strategic Plan

Texas has already invested significantly in understanding the digital divide. Its broadband plans, statewide surveys, regional assessments, and stakeholder engagement have identified underserved communities and documented substantial barriers to digital participation.

That foundation is valuable and should not be discarded or unnecessarily replicated.

Yet the central concern raised throughout successive planning efforts remains:

Texas has documented substantial digital opportunity needs, but their full extent remains incompletely measured—and those needs continue to evolve.

SLC therefore respectfully asks the BDO to prioritize three actions in its final Strategic Plan.

Priority 1 — Establish Continuous Digital Opportunity Measurement

Operationalize the TDOP's existing commitment to a Living Digital Opportunity Plan through a **Living Texas Digital Opportunity Survey and Community Evidence Framework**.

Designate responsibility, preserve existing research, incorporate recurring quantitative and qualitative evidence, maintain accessible participation methods, and report changes in documented barriers and research coverage.

This is our principal recommendation and the foundation for the remaining priorities.

Priority 2 — Integrate Regional Knowledge Into Implementation

Use the Blueprint's proposed regional engagement mechanisms to establish a dependable process for incorporating research and firsthand community evidence from existing institutions.

Connect those findings to adoption assessments, public resource needs, infrastructure considerations, and regional implementation decisions.

The objective is to make continuing community engagement a practical source of evidence that informs decisions.

Priority 3 — Measure Meaningful Outcomes and Report Progress

Strengthen Section 7's accountability framework by connecting infrastructure deployment and subscription-rate measures to affordability, device access, accessibility, digital skills, and meaningful digital participation.

Publish a practical implementation scorecard demonstrating what has been accomplished, what barriers persist, and how new evidence informs decisions.

These priorities reinforce the Blueprint's commitments to fiscal stewardship, transparency, and measurable public value. They also provide a practical means of preserving and expanding the knowledge Texas has developed through earlier planning investments.

Responsible stewardship means preserving what Texas has learned, continuing to discover what remains unknown, and using both to deliver measurable value for Texans.

Shining Light Consulting appreciates the opportunity to contribute to this process and welcomes continued engagement with the Broadband Development Office on transparent, accountable, and community-centered broadband implementation.

Respectfully submitted,

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[redacted]

Supporting Planning References

1. **Texas Broadband Development Office.** *Texas Broadband Plan 2022*, including stakeholder outreach, regional findings, and statewide survey research. https://comptroller.texas.gov/programs/broadband/
2. **Texas Broadband Development Office.** *Texas Digital Opportunity Plan* (2024), including statewide needs assessments, performance objectives, and the commitment to maintaining a Living Digital Opportunity Plan. https://digitalopportunityfortexas.com/plan
3. **Texas Broadband Development Office.** *Texas Digital Opportunity Survey — Sources and Methodology* (2023), including 11,385 valid responses, of which 1,945 were paper submissions. https://digitalopportunityfortexas.com/data/sources-and-methodology
4. **Travis County and City of Austin.** *2023 Digital Equity Needs Assessment*, including community research findings and recommendations. Full report available in English and Spanish. https://www.traviscountytx.gov/digital-equity
5. **U.S. Census Bureau.** *QuickFacts: Texas*, July 2025 population estimate of approximately 31.7 million residents. https://www.census.gov/quickfacts/fact/table/TX/PST045225
6. **Texas Broadband Development Office.** *2026 Strategic Plan Blueprint*, Sections 1–7. https://comptroller.texas.gov/programs/broadband/planning/strategic-plan/