



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
SCOTT M. STRINGER

November 2, 2020

The Honorable Bill de Blasio  
Mayor  
City of New York  
City Hall  
New York, NY 10007

Richard Carranza  
Chancellor  
New York City Department of Education  
52 Chambers Street  
New York, NY 10007

Re: Solving NYC's Connectivity Crisis

Dear Mayor de Blasio and Chancellor Carranza:

I am writing to express my profound concern over the Department of Education's ongoing failure to effectively provide internet access to all of New York City's 1.1 million school children. We have a constitutional mandate, and a moral obligation, to provide a free education to all our City's school-aged children, and right now New York City is failing on all counts. In the 21<sup>st</sup> Century, every school district requires a digital learning strategy, not simply as a solution to a temporary problem, but as a fundamental component of a high-quality education. It is clear by the City's response to school closures during this pandemic that the DOE lacks a broad vision for modern teaching and learning – one that understands the value of digital tools and strives to incorporate them in the educational framework of schools. Allowing students to go without an internet connection – much less the devices needed to access the internet – at a time when most schoolwork must be completed remotely means children are being denied access to educational opportunity and is an abdication of our responsibility on a massive scale. The City must step up to solve this crisis of connectivity in its entirety, both in the near-term and the long-term. To help influence the responses to this problem, my office has three recommendations, detailed below:

1. Convene New York City's top internet service providers and carriers to discuss quick and affordable options to bring reliable internet to all students who currently lack it;
2. Use the City's substantial purchasing power to leverage a competitive price for internet service; and
3. Ensure that students who lack a device are provided one and that families have support to fully connect and use the device.

Our City's deep digital divide impacts over 100,000 school-aged students who live in some 40,000 households without internet, although to date there is no evidence to suggest that the DOE even knows who those children are or where they live. The failure to address this problem has resulted in students going to extreme ends – huddling on street corners around LinkNYC stations to get free Wi-Fi, struggling to find other weak connections in their general vicinity, or using DOE iPads for 'hotspots' which at best provided families with a weak signal of little use for robust 21st century learning. Worst of all is the difficult fact that these obstacles caused many students to not log into remote learning at all. A citywide problem requires a citywide solution, and the short-term deals that some internet service providers have offered for free Wi-Fi, while welcome, are deeply insufficient. Once those deals end, too many of our students will still be without the internet access needed to attend school. And while the City's newly announced plan to install Wi-Fi in shelters may eventually solve this problem for students experiencing homelessness, it does nothing to resolve the digital divide plaguing tens of thousands of other students from low-income families who do not live in shelter.

**In the near-term, I believe the City should immediately convene all Internet Service Providers (ISPs) and carriers operating in the five boroughs to discuss all possible options to quickly provide affordable and reliable internet service to every student in the city who lacks a high-speed broadband connection in their home or shelter.** As part of that effort, the City should be prepared to offer subsidized and redeemable **"Internet Passports"** for low-income families that can be used to purchase broadband service with any ISP in their area. ISPs rely on franchise agreements issued by the City's Franchise and Concession Review Board to provide service – franchises that are mostly due to be re-negotiated soon – and have been among the biggest beneficiaries from changes in consumer behavior as a result of the pandemic. They should be able to provide deeply discounted rates to support students in New York City, both in the near term and as part of any future franchise agreement.

**Likewise, the City should be leveraging its sizable purchasing power to negotiate a price that is well below today's ISP offerings.** An analysis by my office suggests that paying the ISP's advertised price for a Wi-Fi package with minimum speeds of 250 megabits per second would cost about \$40 per household each month. In addition, according to the New America Foundation, the average family in New York City pays \$60 in one-time fees to gain internet access. Taken together, the full cost of effectively closing the digital divide for the rest of the school year would be less than \$16 million. However, the City should not have to pay even close to that. By leveraging its purchasing power and establishing a fair value for city-backed "Internet Passports," there is no reason why the city should have to pay full cost, nor any reason why families should have to pay out-of-pocket costs to get the connection they need. I would add that – having spent more than \$146 million to date to provide Wi-Fi-enabled devices to all city school children who need them – it is deeply short-sighted to not invest the relatively small sum required to make sure all children are sufficiently connected for the demands of 21st century online learning in a pandemic.

**Of course, guaranteeing internet access to every student is only part of the puzzle. We also need to make sure that the 77,000 students who are today without a Wi-Fi-enabled device are provided one swiftly, and that families are provided the necessary support to fully use and connect the device.** Reports to my office indicate that the current system for helping

families and students with technological challenges is failing, with endlessly long wait times, e-tickets being closed without responses, and significant barriers for non-English speaking families. In order to better serve our families technological needs, the City should set up safe, culturally and linguistically competent tech support on the ground in high-need areas, add staff to each Help Desk shift to reduce wait times, and offer safely administered, in-person classes and workshops to develop family's digital competency.

In light of these challenges, pursuant to my office's authority under Chapter 5 of the City Charter, please provide the following information to my office no later than November 13th, 2020:

1. Detailed and updated information about the exact number and location of all students lacking a high-speed internet connection at their home or shelter. This should include:
  - a. Total daily number of students, broken down by zip code and local community school districts, who access TeacherHub to use their school's online learning applications;
  - b. DOE estimates of students' bandwidth speeds broken down by zip code and local community school district, which might be calculated based on average page load timings for instructional applications like TeacherHub or server-based metrics.
2. All information related to any City plans to provide affordable, reliable internet service for every student in need.
3. An accounting of all calls logged at the DOE's help desk, including total number, school location, a summary of challenges, and home language spoken. Please include the average wait time for closing help desk tickets, the number of dropped calls, and the number of tickets that received no response. Such data should already be made publicly available in the same manner that similar 311 data is systematically posted and regularly updated.

Many of our City's 1.1 million school children have been struggling to learn remotely since the outset of this pandemic. While lack of access to the internet may have been a legitimate hurdle in the early throes of the virus' spread, there is no reason why now – more than seven months into the crisis – the City still has no comprehensive plan for addressing these challenges. Without immediate action, these students will fall further behind in their coursework and find themselves at an even deeper educational disadvantage. We cannot allow this to happen. Too much is at stake. I urge you to take immediate and aggressive action to solve these challenges by implementing the recommendations outlined in this letter.

Thank you for your prompt attention to this urgent matter.

Sincerely,



Scott M. Stringer  
New York City Comptroller