



Department of Public Utilities
Department of Telecommunications and Cable

Re: D.P.U. 26-10 / D.T.C. 26-1
Proposed Revision One to 220 CMR 45.00 et seq.

Dear Members of the Department of Public Utilities and the Department of Telecommunications and Cable,

On behalf of Latinos for Education and the students, educators, and families we serve across Massachusetts, we write in strong support for proposed revision one to 220 CMR 45.00 et seq.: “implement comprehensive state-wide terms and conditions for telecommunications, advanced telecommunications, broadband, and CATV providers, to apply for and access utility poles.” Adoption of this revision will contribute to statewide efforts to increase broadband and connectivity access for communities most affected by the technological divide we live in.

Reliable high-speed internet access is no longer optional infrastructure. It is essential for educational opportunity, workforce participation, civic engagement, healthcare access, and economic mobility. Yet many Latino and low-income communities across Massachusetts continue to experience barriers to affordable and reliable broadband service due in part to delayed infrastructure deployment, inconsistent local processes, and unequal investment.

During the COVID-19 pandemic, our organization heard directly from parents struggling to support their children’s education without dependable internet access at home. In a survey of 288 Spanish-speaking Latino parents, 46 percent identified learning loss as their primary educational concern, while 21 percent identified technology and internet access as the most important resource needed in their households. These findings demonstrated that the digital divide is not simply a technology issue, but an educational equity issue.

Recent data from the Massachusetts Broadband Institute’s report, *A Commonwealth Connected: How Digital Infrastructure and Access are Transforming Lives*, further illustrates both the progress that has been made and the continuing need for investment. The report notes that building-wide Wi-Fi initiatives now reach more than 5,300 households in public and affordable housing, more than 16,000 devices have been distributed, and over 24,000 residents have received digital skills training. We have witnessed firsthand how these investments allow students to complete homework online, parents to communicate with teachers virtually, and workers to pursue employment opportunities from home rather than relying on limited public internet access.



The proposed revisions to 220 CMR 45.00 appropriately recognize that timely, transparent, and standardized utility pole access procedures are foundational to achieving broader statewide connectivity goals. When pole attachment processes vary significantly across jurisdictions or involve prolonged delays, broadband deployment becomes more costly and less predictable. These burdens often fall most heavily on historically underserved neighborhoods and smaller communities where many Latino families reside.

We therefore support the Department's efforts to establish clearer statewide standards, improve coordination, increase transparency, and reduce unnecessary delays related to pole attachments and make-ready work. More predictable timelines and more efficient deployment processes can help accelerate broadband expansion into underserved communities, increase competition among providers, and improve affordability for families.

The educational implications of these reforms are substantial. Students increasingly rely on stable internet access to participate in digital learning platforms, complete assignments, access tutoring and college advising, prepare for standardized testing, and engage with emerging technologies, including artificial intelligence tools that are rapidly becoming integrated into education and the workforce. Without reliable broadband access, students risk being excluded from opportunities that are increasingly fundamental to academic and economic success.

As the Departments finalize these revisions, we respectfully encourage continued attention to equity impacts, particularly in communities that have historically experienced inadequate broadband infrastructure and persistent digital access barriers. Policies that promote faster and more equitable broadband deployment can help ensure that Latino students and families are not left behind in an increasingly digital society.

For these reasons, Latinos for Education strongly supports adoption of Proposed Revision One to 220 CMR 45.00 et seq. We appreciate the Departments' leadership and commitment to expanding connectivity, improving infrastructure access, and advancing digital equity across the Commonwealth.

Thank you for your consideration.

Sincerely,