



**STATE OF VERMONT  
OFFICE OF THE STATE AUDITOR**

To: June E. Tierney, Commissioner, Department of Public Service  
From: Doug Hoffer, State Auditor  
Re: 10-Year Telecommunication Plan  
Date: 29 September 2023

I recently asked my staff to research the State's telecommunication planning efforts after hearing from members of the public who had concerns about Vermont's 10-Year Telecommunications Plan. This research identified several shortcomings in the State's current telecommunications plan, and I am concerned these may be repeated as your Department develops future versions of the plan. My main concern is that the plan does not clearly identify recommendations for achieving Vermont's telecommunications goals and does not establish measures to evaluate progress towards those goals. As a result, there is no way to hold PSD accountable for achieving the State's telecommunications goals.

PSD is currently developing a new version of the telecommunications plan using the same vendor that produced the current plan and under a similar scope of work. Because of that, I expect that the next State telecommunications plan will have similar shortcomings. However, by outlining my concerns in this memo I hope to ensure that PSD requires the vendor to produce a more effective and appropriate telecommunications plan.

Since the process to develop the new telecommunications plan is still underway, I have decided not to initiate an audit at this time. My office will continue to monitor this process, and I may decide to conduct an audit in the future.

Ensuring Measurable Progress Towards the State's Telecommunications Policies and Goals

The State's current telecommunications plan describes itself as a "roadmap," but an effective roadmap should clearly identify specific recommendations and establish performance measures. The current plan does neither of those things. There is no complete list of recommendations, and it is sometimes unclear what specific actions the plan recommends. The plan also does not establish any meaningful performance measures with baselines, targets, and timeframes. Without meaningful measures, it is impossible to evaluate progress towards achieving the State's telecommunications goals or hold PSD accountable if those goals are not met.

These deficiencies are more telling when the telecommunications plan is compared to the [State's Comprehensive Energy Plan](#), which is also produced by PSD. That plan includes specific goals with quantified targets and timelines, such as meeting 10% of transportation energy needs from renewable energy by 2025.

Addressing Each of the State's Telecommunications Policies and Goals

The current plan states it is intended to address six telecommunications goals which are "informed by" statute. However, statute requires that the telecommunications plan address **each** of the State's ten telecommunications goals listed in [30 V.S.A. § 202c\(b\)](#). It does not appear that the current plan does so. For example, the State's goal of supporting affordable services for transmitting voice and high-speed data is not covered by any of the six telecommunications goals from the current plan.

### Complying with Statutory Requirements for Preparing the Telecommunications Plan

[Statute](#) describes the tasks PSD must complete when preparing the telecommunication plan, and it is unclear whether PSD met all those requirements when preparing the current plan.

For example, statute requires a survey of Vermont residents and businesses about telecommunications needs. According to statute, surveys should specifically focus on the education, health care, public safety, and workforce training and development sectors. Statute also required relevant State officials to provide input, such as the Commissioner of Labor for the workforce training and development sectors.

The vendor did conduct surveys when preparing the current plan, and as part of our research we requested PSD provide details about the survey methodology and results. PSD staff were unable to provide that information, so the only information about the surveys that is available is what the vendor included in the telecommunications plan. Based on that, the surveys did not appear to focus on the specific sectors as required by statute. The surveys did not include specific questions about those sectors, and the current plan does not identify anyone from the Vermont Department of Labor in a list of State Agencies and Departments that provided input on the plan.

Additionally, the vendor only used online surveys to develop the plan, which obviously limits the ability to draw conclusions about Vermonter's telecommunications needs. The current plan even acknowledges this, noting that "there clearly are limitations to online surveys about telecommunications needs."

### PSD's Contract for the New Telecommunications Plan May Result in Similar Shortcomings

The contract for the next telecommunications plan states the plan must include "concrete steps" for achieving each of the State's telecommunications goals and it includes a verbatim list of those goals. The contract also notes that the plan must be "implementable." Lastly, the contract references each of the statutory requirements for preparing the telecommunications plan as specific tasks that must be accomplished. If the new plan is completed in line with the contract, it will represent an improvement over the current telecommunications plan and will address the issues noted above. However, the contract for the development of the current plan also included the same language and referenced the same statutory requirements. Since PSD is using the same vendor to develop the new telecommunications plan, and the terms for developing that plan are generally the same, it is likely that the next telecommunications plan will have similar shortcomings.

In addition to the areas of concern described above, we also identified instances where the relevant statute appeared unclear or were left open to PSD's interpretation. For example, statute does not explicitly require that the telecommunications plan include recommendations. This is in contrast to the statute related to the Comprehensive Energy plan, which explicitly directs PSD to develop a plan that includes recommendations for State actions. I have communicated these issues, along with a summary of the issues noted here, in a separate memo to the Legislature.

My staff and I will continue to monitor these issues and I look forward to seeing the results of PSD's efforts to develop the State's next 10-year Telecommunication Plan.