

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
Modifications to the California Advanced Services
Fund

Rulemaking 12-10-012

**REPLY COMMENTS OF THE CALIFORNIA BROADBAND POLICY
NETWORK ON THE ORDER INSTITUTING RULEMAKING**

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INTRODUCTION

The California Broadband Policy Network (“CBPN”) submits its Reply Comments on the Order Instituting Rulemaking (OIR) to Consider Modifications to the California Advanced Services Fund (CASF). The CBPN, formerly the California Community Technology Policy Group (CCTPG), is a statewide alliance of diverse community-based organizations that advocates for policies that improve access to broadband media and creates digital opportunities for underserved people and places.

I. DISCUSSION

REPLY TO THE COMMENTS OF DRA

CBPN disagrees with DRA's assertion that no evidence exists to support the belief that opening CASF participation to non-licensed carriers could result in better projects.¹

A number of municipal and community-based broadband services deployments throughout the nation have delivered cost-savings, network speeds and other benefits that outperform the private sector offerings in the same geographic area.

One excellent example of such a project is already operational in California. The Tribal Digital Village of the Southern California Tribal Association is a consortium of nineteen tribal communities that provides a network for web access and distance learning services for tribal and community members.²

¹ DRA comments in 12-10-012

² *New Media, Technology and Internet Use in Indian Country: Quantitative and Qualitative Analyses*. Traci Morris, Sascha D. Meinrath. November 19, 2009

36% of the Tribal Digital Village community now has Broadband access, whereas the national average of access in tribal areas is just 10%. In reaching this mark, TDV has addressed the aims of CASF without having access to CASF funding, something the private sector was either unwilling or unable to do.

Respectfully submitted, Dated: December 18, 2012

/s/

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