

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Draft Resolution T-17443 Implementation of
New Timelines for California Advanced
Services Fund Applicants

DRAFT RESOLUTION T-17443

COMMENTS OF THE LOS ANGELES COUNTY REGIONAL BROADBAND CONSORTIA

ON

DRAFT RESOLUTION T-17443

IMPLEMENTATION OF NEW TIMELINES FOR

CALIFORNIA ADVANCED SERVICES FUND APPLICANTS

Diana Rodriguez
Revlyn L. Williams
Co-Coordiators
Los Angeles County Regional Broadband Consortia
c/o Youth Policy Institute
634 W. Spring Street
Los Angeles, California 90017
P: 213.688.2802
drodriguez@yplusa.com
rlwilliams@mctorg.com

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The LOS ANGELES COUNTY REGIONAL BROADBAND CONSORTIA, hereby submits its Comments in response to the **CPUC Draft Resolution T-17443 Implementation of New Timelines for California Advanced Services Fund Applicants.**

The LACRBC recommends that the CPUC enforce of the Right of First Refusal by requiring existing providers to submit with their letter of intent, the following supporting documentation:

- A Work Plan for the upgrade of its facilities;
- A Progress Report on the proposed upgrade / build within 30-45 days after; and
- Submit monthly progress reports thereafter for the remaining 6 months

The LACRBC supports the language (Appendix 2) allowing staff the ability to give a "fast no" to applications that do not meet the criteria.

The LACRBC supports creating a smaller subset / list 10-20 (or more) areas from the designated 180 communities in the CASF Priority Areas List, to identify common priority areas between CPUC and other state agencies – California Environmental Protection Agency (Cal EPA), California Department of Food and Agriculture, and Governor's Office of Business and Economic Development (GO Biz). A smaller subset will help illustrate where local, regional, state and federal funding will be targeted or could be targeted, and where broadband efforts and investments could be coordinated.

The LACRBC opposes the ability of satellite service providers effectively blocking terrestrial-based applications (i.e. fiber and wireless) for three years. Satellite service may be adequate for the hardest to serve rural remote areas, but should not substitute for terrestrial-based services.

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Respectfully submitted,
Diana Rodriguez
Revlyn L. Williams



Co-Coordinator
Los Angeles County Regional Broadband Consortia
c/o Youth Policy Institute
634 W. Spring Street
Los Angeles, California 90014
P: 213.688.2802
drodriguez@ypiusa.org || rlwilliams@mctorg.com