

PUBLIC UTILITIES COMMISSION

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June 16, 2014

Ryan Dulin
Director of Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

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

Dear Mr. Dulin,

The Office of Ratepayer Advocates (ORA) submits these reply comments in response to the comments received on Draft Resolution T-17443, mailed on May 27, 2014.

A. Commenters Overstate the “Right of First Refusal”

In the opening comments, several parties incorrectly interpret the “right to first refusal” by seeking to expand it. The Small LECs argue that this “right” should not be limited to just the period before the first CASF application period, and seek an opportunity to respond to an application to provide updates in their existing service area.¹ Verizon complains that the Draft Resolution does not comply with the statute, claiming SB 740 requires the “right of first refusal” on a project by project basis.² According to the California Cable & Telecommunications Association (CCTA), asking for plans to build and upgrade a network merely telegraphs those plans and fails to allow an existing provider the ability to exercise its right to upgrade as an alternative to granting the CASF applications.³

These comments overstate the right of first refusal. Although styled as such in the Resolution, the statute does not actually provide for a “right of first refusal.” Rather it states, in part:

That funding for a project providing broadband access to an underserved household shall not be approved until after any existing facilities-based provider has an **opportunity to demonstrate** to the commission that it will, within a reasonable timeframe, upgrade existing service.⁴ (Emphasis added.)

All Senate Bill (SB) 740 requires is that existing providers have an “opportunity to demonstrate” to the Commission that it will, within a reasonable timeframe, upgrade its facilities. The Draft Resolution provides this opportunity. Further, the statute should be read with the other

¹ Small LECs Comments at 3.

² Verizon Comments at 1.

³ CCTA Comments at 2.

⁴ Cal. Pub. Util. Code section 281(e)(3)(B).

requirements therein, including the goal of approving funding by the end of 2015 for projects that will provide broadband access to 98% of California households. Therefore, ORA supports the Draft Resolution on this point, and arguments by existing providers to redefine or expand the right of first refusal should be dismissed.

Moreover, ORA agrees with parts of Valley Vision's recommendation that the Commission require incumbents which exercise their right of first refusal to meet the same standards that any CASF applicant would have to meet, including submission of project budgets, schedules, and technical plans.⁵ In order to exercise its right of first refusal, an existing provider must demonstrate that it will upgrade its services, therefore it is reasonable to require carriers to justify their intent with appropriate documentation.

B. Upgrading Existing Facilities Within a Six Month Timeframe is Reasonable

Several comments argue that requiring the upgrade of facilities within a six-month time period is unrealistic. Verizon argues that there are numerous factors in completing a project which are time consuming, e.g., planning, engineering, procuring parts and materials, permit review/approval, building and testing projects.⁶ The Small LECs argue that the proposed six-month construction timeframe fails to take into consideration the "remote, rugged and inhospitable terrain" of their service territory, and other environmental and geographical conditions during the winter months that will limit the existing providers' efforts to complete the project within this time period.⁷ ORA finds the six-month time period reasonable and necessary to implement other provisions in the statute, including the goal to approve funding for projects by the end of 2015. In order to meet this goal, the Commission needs time to consider other CASF applications in the event the existing provider does not meet its commitment. Moreover, since these are underserved areas, not unserved, there are existing facilities that are already operational. The required six month completion timeframe should be retained, although allowing the provider, on a case-by-case basis, to seek an extension upon clear and convincing demonstration of extenuating circumstances may be reasonable.

C. Penalties Are Needed for Failure to Follow Through With Commitment

ORA agrees with the Central Coast Broadband Consortium and Central Sierra Regional Broadband Consortia that the lack of penalties for submitting a letter of intent and failing to follow through may stall the filing of competitive project applications.⁸ The Resolution should be amended to add language to provide penalties for any applicant that fails to follow through with its commitment.

⁵ Valley Vision Comments at 4.

⁶ Verizon Comments at 1.

⁷ Small LECs Comments at 4.

⁸ Central Coast Broadband Consortium and Central Sierra Regional Broadband Consortia Comments at 2.

However, ORA disagrees with the statement that “while CPCN holders may be subject to penalties for failure to fulfill a promise made to the Commission, there is no such prospect for companies which do not hold a CPCN.”² In Decision (D.) 14-02-018, the Commission specifically stated:

We conclude that § 2111 permits the Commission to enforce the CASF requirements in both the construction and the post-construction phases against non-telephone corporations, i.e., entities which do not hold CPCNs or WIRs, through the use of penalties.... [W]e should enforce the requirements of the CASF program on non-telephone corporations and ensure that non-telephone corporations follow the same rules and regulations as telephone corporations with regard to the CASF program.¹⁰

Therefore, non-telephone corporation grantees are subject to the same rules and requirements as existing providers with regard to the CASF program. Failure to comply with CASF compliance and program requirements by an applicant may result in the Commission choosing to invoke the penalty provision of § 2111. Similarly, if a non-CPCN holding existing provider wishes to exercise its right of first refusal pursuant to Pub. Util. Code § 281, it should be subject to penalties regardless of whether or not it is a CASF grantee/applicant.

D. A Process Should be Developed to Allow Periodic Updates to the Broadband Availability Map

Several of the parties, including many of the Consortia, argue that the Commission’s broadband availability map is inaccurate or outdated in identifying whether an area is served, underserved, or unserved. ORA recognizes and acknowledges the Commission’s recent efforts to encourage public feedback regarding broadband availability in the State.¹¹ Public feedback is critical and necessary to prove out if an area is in fact not served. Hence, it is necessary for the priority list spreadsheet to be posted on the CASF webpage to show updates to the status of any of the areas currently identified.

E. Frontier’s Request to Increase Funding Cap Should Be Dismissed

In its opening comments, Frontier argues that the existing 70% funding cap is too low, and many projects in the remaining extremely rural and high cost areas cannot be financially justified.¹² Frontier’s request and argument should be dismissed. Under current rules CASF applicants may obtain supplemental financing in addition to a grant by applying for a CASF loan of up to 20% of projects costs, with a maximum of \$500,000. A CASF applicant may already be able to receive up to 90% in CASF funding for unserved areas as a combination of a grant and loan. In addition, a Resolution is not the appropriate place to make a change to existing CASF funding levels. Instead, any changes to the funding cap must be done through a Commission decision.

² *Ibid.*

¹⁰ D.14-02-018, *mimeo*, at 34.

¹¹ Broadband availability public feedback can be found at <http://www.broadbandmap.ca.gov>.

¹² Frontier Comments at 3.

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Respectfully submitted,

/s/ KIMBERLY LIPPI

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KPP:cdl

cc: John Baker, Communications Division
Service List: Draft Resolution T-17443

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served a copy of **OFFICE OF RATEPAYER ADVOCATES REPLY COMMENTS to DRAFT RESOLUTION T-17443 IMPLEMENTATION OF NEW TIMELINES FOR CALIFORNIA ADVANCED SERVICES FUND APPLICANTS** to the attached service list for Draft Resolution T-17443

Executed on **June 16, 2014** at San Francisco, California.

/s/ CHARLENE D. LUNDY
Charlene D. Lundy

**SERVICE LIST TO
DRAFT RESOLUTION T-17443**

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