

**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 VALLEY VISION  
ON  
DRAFT RESOLUTION T-17443  
IMPLEMENTATION OF NEW TIMELINES FOR  
CALIFORNIA ADVANCED SERVICES FUND APPLICANTS**

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## **BACKGROUND**

VALLEY VISION, hereby submits its Comments in response to the **CPUC Draft Resolution T-17443 Implementation of New Timelines for California Advanced Services Fund Applicants.**

Valley Vision is an independent nonprofit based in Sacramento. Through our outreach work as the host agency for the “Connected Capital Area” Broadband Consortium (CCABC), we have heard from multiple stakeholders about how to best meet the broadband needs in urban and rural areas. In particular, the CCABC is focused on closing the Digital Divide and thereby opening opportunities for disadvantaged communities.

## **PROJECTS SHOULD CONSIDER AFFORDABILITY**

With respect to CPUC Draft Resolution T-17443 Implementation of New Timelines for California Advanced Services Fund Applicants, Valley Vision appreciates the reference to pricing as one of the top four criterion for evaluating project proposals as described in the Revised Application Requirements and Guidelines for the Broadband Infrastructure Grant Account. Affordability is a major barrier for disadvantaged communities in adopting and using broadband service when it is available. Any publically subsidized projects should bear in mind affordability for low-income groups in deeming an area as served. Otherwise, the Digital Divide will continue to persist and along with it an opportunity divide that will leave the most disadvantaged communities further and further behind.

## **APPLICATION REQUIREMENTS FOR EXISTING PROVIDERS SHOULD ALIGN WITH REQUIREMENTS FOR OTHER CASF APPLICANTS**

Valley Vision also supports the right of first refusal for existing providers to declare their intent to provide served speeds for unserved and underserved areas in their current service territories as

per SB 740. We appreciate the deadline of September 26, 2014 for existing providers to signal their first right of refusal. Likewise, Valley Vision supports the deadline of April 1, 2015 for existing providers to complete the upgrades their networks and provide evidence of served speeds. It is noted in the application guidelines that quarterly progress reports are required. Valley Vision respectfully recommends that the Commission require incumbents who 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, technical plans and the posting of a performance bond. Such a change would bring the Draft into compliance with SB 740, which requires an incumbent who exercises a right of first refusal to “demonstrate to the commission that it will, within a reasonable timeframe, upgrade existing service”.

## **CLOSING**

In addition, Valley Vision applauds the eligibility of entities not designated with a Certificate of Public Necessity and Convenience (CPCN) or a Wireless Identification Registration (WIR) to apply to the California Advanced Services Fund (CASF) after the first two applications rounds, as proposed in the Draft Resolution. As noted in previous comments, CCABC stakeholders have indicated that allowing for a variety of types of entities to apply for funding can best lead to consolidated and coordinated broadband projects within a region.

Valley Vision is fully supportive of the statutory goal pursuant to Senate Bill 740 of providing broadband access to no less than 98% of California households by the end of 2015. We look forward to supporting the goal of broadband access as well as advancing adoption and use through the continued efforts of the CCABC and the work of the CPUC in approving CASF projects to meet the needs of unserved and underserved areas in California.

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Respectfully submitted,

VALLEY VISION

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