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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

**ASSIGNED COMMISSIONER'S RULING
REQUESTING COMMENTS ON REVISED CALIFORNIA
ADVANCED SERVICES FUND BROADBAND ADOPTION ACCOUNT
APPLICATION REQUIREMENTS AND GUIDELINES**

Summary

This ruling provides notice and opportunity for parties to comment on proposed modifications and clarifications to the California Advanced Services Fund (CASF) Broadband Adoption Account Application Requirements and Guidelines attached to this Ruling as Appendix 1. Parties comments are limited to Appendix 1 and shall be organized by heading of each section of the Requirements and Guidelines where applicable. Parties may also propose alternatives to the proposed changes.

Opening Comments may be filed and served on the service list by 20 days after the issuance of this ruling and Reply Comments may be filed and served on the service list by 30 days after the issuance of this ruling. The California Public Utilities Commission (Commission) plans to issue a Proposed Decision modifying the CASF Broadband Adoption Account Application Requirements and Guidelines based on the comments to the instant ruling and the record in this proceeding during the first quarter of 2019.

1. Background

On October 15, 2017, the Governor signed Assembly Bill (AB) 1665 (Garcia)¹ into law. This legislation amended the statutes governing the CASF program, Public Utilities Code §§ 281, 912.2, and 914.7. As a result, in June 2018, the Commission issued Decision (D). 18-06-032² which implemented provisions of AB 1665 and adopted new rules for administering the Broadband Adoption Account.

The first round of applications were due on August 31, 2018 with an award cap of \$5 million.³ The Commission received applications for 64 projects requesting \$8.4 million in grant funding. Based on the Commission's experience with the first round of applications, the Commission proposes to:

- 1) set a \$5 million award cap for each application cycle;
- 2) clarify the types of reimbursable project costs and the 85% funding cap; and
- 3) modify the application submission deadlines.

2. Proposed Modifications and Clarifications for Comment

The Commission seeks parties' input on the following proposed modifications and clarifications to the CASF Broadband Adoption Account Application Requirements and Guidelines below. The proposed revisions and

¹ AB 1665 is codified at Public Utilities Code Section (Pub. Util. Code §) 281.

² Decision Implementing the California Advanced Services Fund Broadband Adoption, Public Housing and Loan Accounts [D.18-06-032] (2018), Appendix 1, p. 14.

³ *Ibid.*

modifications to Appendix 1 of D.18-06-032 are incorporated herein and is attached as Appendix 1.

2.1. \$5 Million Award Cap per Application Cycle

To ensure that funds would be allocated throughout the state, D.18-06-032 allocated only \$5 million of the \$20 million authorized to be awarded in the first application window (August 2018) to serve as a pilot to determine the effectiveness of the Adoption Account strategy and assess demand for adoption funds. D.18-06-032 further stated that the Commission may revisit this application window amount and assess the effectiveness of the Adoption Account after analyzing applications submitted in the first application window.⁴ Based on our experience with the first application cycle, we propose that a \$5 million award cap be applied to each application cycle to continue to ensure that funds are allocated throughout the state, and that not all funds would be allocated within the first year. This will also provide the Commission an opportunity to continually assess the effectiveness of the Adoption Account strategy and propose any changes in future cycles if needed.

2.2. Clarification on Reimbursable Project Costs and the 85% Funding Cap

D.18-06-032 states that the Commission may fund up to 85 percent of the total eligible program cost and requires that 15 percent of the approved project costs must be supported or matched by other funds.⁵ Other funds may include funding via leveraged funds from other entities, public purpose programs or

⁴ D.18-06-32, pp. 12-13

⁵ D.18-06-32, p. 19.

self-funding from the applicant themselves. We hereby clarify that the Commission may fund up to 85 percent of the total eligible CASF program cost, as opposed to total program cost which can sometimes include facilities rent, utilities, and other non-eligible reimbursable costs in the Adoption program. The “up to 85 percent reimbursement cap” shall apply to the total eligible program cost after any disallowances for ineligible expense grant request.

Further, D.18-06-032 states that the Commission may reimburse the following:⁶

- i. Education and outreach efforts (including travel, up to 10% of grant amount) and materials;
- ii. Acceptable devices (does not include smartphones) and software within limits;
 - In-Classroom computing devices
 - Take-home computing devices (For Digital Literacy Projects only).
- iii. Printers;
- iv. Routers;
- v. Provision of technical support for the installation of equipment subsidized through this program;
- vi. Desks and chairs to furnish a designated space for digital literacy or broadband access;
- vii. For Digital Literacy Projects, gathering, preparing, creating and distributing digital literacy curriculum; and

⁶ *Id.* at Appendix 1, p. 6

- viii. Digital literacy instructors or Staffing for monitoring the designated space or staffing for call centers (if applicable)⁷.

We further clarify and elaborate on some of these categories so to better assist applicants in their budget proposal and planning. Section 1.6 of the attached Appendix 1 incorporates these proposed modifications and clarifications.

2.3. New Application Cycle and Submission Deadlines

D.18-06-032 provides the following application windows and deadlines:

- i. August 31, 2018
- ii. January 1, 2019
- iii. July 1, 2019
- iv. January 1, 2020
- v. July 1, 2020
- vi. January 1, 2021
- vii. July 1, 2021
- viii. January 1, 2022
- ix. July 1, 2022⁸

Due to the timing of this ruling, and the need for parties' comments, we propose the following updated schedule for all future application cycles. The extension will also allow Commission staff time to make any relevant changes to the application templates and the administrative manuals. We further clarify

⁷ D.18-06-032, Appendix 1, pp. 5-6.

⁸ D.18-06-032 Appendix 1, pp 10

that application cycles may, however, end sooner if all funds have been awarded in prior cycles or may be extended if remaining funds exist.

- i. March 1, 2019
- ii. August 1, 2019
- iii. January 1, 2020
- iv. July 1, 2020
- v. January 1, 2021
- vi. July 1, 2021
- vii. January 1, 2022
- viii. July 1, 2022

3. A Process for Staff to Update Future Broadband Adoption Account Rules by Resolution

This ruling also clarifies that Communications Division Staff has the authority to prepare Resolutions that propose purely administrative changes to the CASF Adoption rules, and to present these Resolutions to the full Commission for a vote. The Commission may also consider whether to expand the scope of Staff's authority in a future Decision.

IT IS RULED that:

1. Comments are solicited regarding the proposed modifications and clarifications to the California Advanced Services Fund (CASF) Broadband Adoption Account Application Requirements and Guidelines (Appendix 1).
2. Opening Comments may be filed and served on the service list on Appendix 1 no later than 20 days after the issuance of this ruling.
3. Reply Comments may be filed and served on the service list on Appendix 1 no later than 30 days after the issuance of this ruling.

4. The Commission plans to issue a Proposed Decision modifying the CASF Broadband Adoption Account Application Requirements and Guidelines based on the comments to the instant ruling and the record in this proceeding during the first quarter of 2019.

Dated December 7, 2018, at San Francisco, California.

/s/ MARTHA GUZMAN ACEVES

Martha Guzman Aceves
Assigned Commissioner

Appendix 1

APPENDIX 1
Proposed Revisions to the California Advanced Services Fund
Broadband Adoption Account
Application Requirements and Guidelines

1.1. Background

On October 15, 2017, Governor Brown signed AB 1665, directing the Commission to create the new Broadband Adoption Account within the California Advanced Services Fund (CASF). Moneys in the Broadband Adoption Account are available to the Commission to award grants to increase publicly available or after-school broadband access and digital inclusion, such as grants for digital literacy training programs and public education to communities with limited broadband adoption, including low-income communities, senior communities, and communities facing socioeconomic barriers to broadband adoption. Moneys in the Broadband Adoption Account shall not be used to subsidize the costs of providing broadband service to households.⁹

1.2. Amount Available for Grants

Twenty million dollars will be available through the Broadband Adoption Account, although some may be used for publicly supported communities (PSCs) otherwise eligible to apply for funding from the Broadband Public Housing Account (BPHA) if all monies in that account are exhausted.

No more than \$5 million will be awarded in each application window. Applicants that are not awarded a grant in the application window they applied for may reapply in any future application window.

1.3. Preference

AB 1665 requires the Commission to give preference to programs in communities with demonstrated low broadband access, including low-income communities, senior communities, and communities facing socioeconomic barriers to broadband adoption.

⁹ Pub. Util. Code, § 281 (j)(6).

Applicants must complete a “Preference Checklist,” and the Commission will prioritize projects for funding based on preferences met (e.g. number of preferences checked).

1.4. Definitions

“Basic Internet Skills”¹⁰ may include the following:

- a. Computer Basics
 - i. How to use the mouse and keyboard
 - ii. How to use the operating system and important services such as email
- b. Internet Basics
 - i. How to use the browser
 - ii. How to search the internet
 - iii. How to evaluate information sources
- c. Internet Safety Basics
 - i. How to identify a scam
 - ii. How to maintain online privacy
 - iii. How to protect your online identity

Communities with demonstrated “low broadband access” for the Adoption Account are defined as communities or areas having low broadband subscription rates (a.k.a., low broadband adoption) relative to the statewide average¹¹ including communities facing socioeconomic barriers to broadband and adoption.

“Communities facing socioeconomic barriers to broadband adoption” include low-income communities, communities with a high percentage of residents with limited English Proficiency, communities with a high percentage of residents with

¹⁰ “NTIA Broadband Adoption Toolkit,” published May 2013, draws on the experience of the recipients of grants from the Broadband Technology Opportunities Program and provides examples of grants. Available at https://www2.ntia.doc.gov/files/toolkit_042913.pdf.

¹¹ According to the annual survey conducted for the California Emerging Technology Fund (CETF), as of July, 2016, California has an overall adoption rate of 84% (<http://www.cetfund.org/node/9318>).

limited educational attainment, or communities with some other demonstrated disadvantage which affects broadband adoption.¹²

“Low-income communities” include those communities with a median household income at or below the California Alternate Rates for Energy (CARE) program income limits for a household of four¹³. “Communities” can be geographically defined by a political or US Census geographic extent (such as a city or county boundary, or a census tract/block or designated place), by location (such as a public housing complex or senior center) or by the class or category of people served (such as disadvantaged youth). Income information provided by the applicant must be for the designated community.

A project is located in a "rural" area if it meets one of the following criteria; it is located in one of the following:

- a. an area that is eligible for federal program under the United States Department of Agriculture (USDA) Section 515 program;
- b. a city with a population of 40,000 or less or in a non-urban area; or
- c. an unincorporated area of a county and is not in an urban area.

1.5. Eligible Applicants

Pursuant to AB 1665, eligible applicants are local governments, senior centers, schools, public libraries, nonprofit organizations, and community-based organizations with programs to increase publicly available or after school broadband access and digital inclusion, such as digital literacy training programs.

Further, AB 1665 authorizes Publicly supported communities (PSCs) to be eligible to submit an application for funding from the Broadband Adoption Account only after all funds available for adoption projects from the BPHA have been awarded.¹⁴

¹² California Broadband Report, A Summary of Broadband Availability and Adoption in California as of June 30, 2011, Pages 22-28, show correlation of factors relative to adoption. See <http://www.cpuc.ca.gov/General.aspx?id=5753>

¹³ CARE income limits can be found here: <http://consumers.cpuc.ca.gov/lowincomerates/>.

¹⁴ Pub. Util. Code, § 281 (i)(4)(A).

No adoption grant recipient can charge for classes (funded by a grant) or make a profit of any kind from the grant funds.

1.6. Eligible Projects

Digital Literacy Projects & Broadband Access Projects

Digital inclusion projects may include digital literacy training programs and public education to communities with limited broadband adoption, including low-income communities, senior communities, and communities facing socioeconomic barriers to broadband adoption, consistent with the adoption projects of the Public Housing Account.

Broadband Access projects may include those that provide free broadband access in community training rooms or other public space, such as local government centers, senior centers, schools, public libraries, nonprofit organizations, and community-based organizations. The Commission may also fund community outreach, such as analysis, comparison of Internet plans within the community, and call centers that will increase broadband access and adoption.

The Commission may fund up to 85 percent of the eligible program costs and may reimburse the following:

- a. Education and outreach efforts (including travel, up to 10% of approved grant amount) and materials;
- b. Acceptable Computing devices (does not include smartphones within limits;
 - o In-Classroom computing devices
 - o Take-home computing devices (For Digital Literacy Projects only).
- c. Software;
- d. Printers;
- e. Routers;
- f. Provision of technical support for the computing devices subsidized through this program;
- g. Desks and chairs to furnish a designated space for digital literacy or broadband access;
- h. For Digital Literacy Projects, gathering, preparing, creating and distributing digital literacy curriculum; and

- i. Staff including digital literacy instructors, staff for administering the program, staff for monitoring the designated space, or staff for administering call centers (if applicable).

Facility rent, utilities, internet service costs, food costs, lodging, marketing incentives for participation (gift cards, giveaways, etc.), certain classroom supplies and accessories, and other items not listed above are not eligible for reimbursement. All funding requests will be assessed for reasonableness and may be adjusted accordingly at the discretion of the Commission. Any remaining project costs not authorized for funding by the CASF Adoption grant must be funded by other sources (leveraged or self-funding).

1.7. Subsidy Levels

The Commission may fund up to 85 percent of the total eligible program costs listed above.

Reimbursement for computing devices used in community training rooms or other public space, such as local government centers, senior centers, schools, public libraries, nonprofit organizations, and community-based organizations, are limited to \$750 per device, with a cap of 15 devices per designated space or project (device software costs will be considered a separate expense). Overall costs for such computing devices may exceed these caps, however any portion not approved for grant funding must be funded by other sources (leveraged or self-funding).

For Digital Literacy Projects, only households that participate in the Supplemental Nutritional Assistance Program, the National School Lunch Program, or the Women, Infants, and Children Program are eligible to receive computing devices to take home after completing digital literacy training courses. Reimbursement for take-home computing devices are capped at \$150 per device, limited to one computing device per eligible household, and limited to \$10,000 per application/project location. Grantees should ensure proof of eligibility in their distribution of computing devices for households

1.8. Information Required from Applicants

Applicants must complete and submit a project application form for each project location, along with a signed affidavit, which will be available on the Commission's website. Staff will post the application descriptions submitted by the deadline on

the CASF webpage. Applicants must submit the required information requested to the Commission for each proposed project. All applications will be reviewed and evaluated for its completeness and overall quality. Incomplete applications will be rejected.

Digital Literacy Projects & Broadband Access Projects

a. Project Description

- i. Applicant's name, description of organization;
- ii. Applicant's non-profit designation, if applicable;
- iii. Applicant's experience in providing digital literacy instruction or broadband access;
- iv. Contact person, title, address, e-mail, phone;
- v. Project title;
- vi. Proposed Project Area/Community/ Location (Community / County / Census Block(s)) including address (if applicable);
- vii. CASF Funding Requested (Amount of Grant);
- viii. Efforts to leverage funds from other sources (non-CASF moneys);
- ix. Area/ Community/ Location's (by census tract or other delineation), adoption levels, income, demographics;
- x. Needs Assessment. Description of the need for this project: Does the community have low broadband adoption relative to the statewide average? Does the community face socioeconomic barriers to broadband access and adoption? For example, see NTIA Toolkit "Understand Community Needs and Opportunities"¹⁵
- xi. Completed Preferences Checklist;
- xii. Demonstration of community support: examples could include letters of endorsements should be obtained from community-based organizations, schools, hospitals, libraries, businesses and consumers;
- xiii. Description of partnerships with local Community Based Organizations (CBOs), Internet Service Providers, media groups, for-profit companies and other applicable organizations;

¹⁵ "NTIA Broadband Adoption Toolkit," published May 2013, draws on the experience of the recipients of grants from the Broadband Technology Opportunities Program and provides examples of grants. Available at https://www2.ntia.doc.gov/files/toolkit_042913.pdf.

- xiv. Description of planned outreach efforts, including sample promotional material, planned community events, volunteer recruitment or any other relevant materials;
- xv. Projected number of participants reached through outreach activities;
- xvi. Description of partnership with carriers and any existing affordable plans that will be offered in the community; and
- xvii. Projected number of new residential broadband subscriptions resulting from the project for each location (including documentation of all assumptions and data sources used to compile estimates).

Additional Information Required for Digital Literacy Projects only

- i. Curriculum for training;
- ii. Description of the type of training to be provided (on-site instructor and/or tutoring);
- iii. Projected number of participants to be trained by the project for each location; and
- iv. Projected number of participants who will receive tutoring or other digital literacy instruction (such as the assistance of knowledgeable volunteers during open computer lab hours) outside of the 8-hour training for each location.

Additional Information Required for Broadband Access Projects only

- i. Description of any planned improvements to an existing space for broadband access, including the purchase of computing devices and any installation or set-up activities;
- ii. Description of any set up of a new space for broadband access, including the purchase of computing devices and any installation or set-up activities. Note that the Adoption Account does not pay for any inside network setup other than to connect computers purchased with fund money to an existing inside network (inclusive of any required routers);
- iii. Projected number of participants served by the project and the projected number of hours of access to be provided; and
- iv. Projected number of participants who receive information regarding broadband plans in the community.

b. Work Plan

- i. The Work Plan should include detailed functions, activities, and deliverables related to implementing the adoption program.

- ii. The Work Plan should include a timeline identifying milestone dates for completion of key Work Plan activities and deliverables proposed to be funded; the timeline should describe each of the monthly milestones, including performance metrics to be accomplished;
 - iii. The schedule may incorporate a ramp-up period (a maximum of six months), followed by project deployment (a maximum of 24 months);
 - iv. The ramp-up period will incorporate any training room or computer room set-up activities as well as community outreach;
 - v. The project deployment period is where activities to increase digital inclusion occur or where broadband access will be monitored; community outreach may be ongoing.
- c. Performance Metrics Plan
- i. A detailed description of how outcomes will be measured and tracked for reporting requirements (“milestone/completion” reports). Outcomes include but are not limited to:
 - The total number of participants trained or provided access;
 - The total number of hours that training or access has been provided to the community and the number of participants served;
 - The number of participants that subsequently subscribe to a broadband Internet service provider to use a device in their home.
 - ii. Methods of tracking such as verification of subscription online, such as through ISPs, bill, surveys, sign-in sheets, etc.
- d. Budget
- i. A detailed breakdown of cost elements for the proposed project;
 - ii. A detailed breakdown of the instructor/staff pay rate relative to projected number of training or access hours and prep time; and
 - iii. Availability of matching funds to be supplied by applicant and/or other sources.
- e. Affidavit
- i. All applicants must submit an affidavit, under penalty of perjury, that to the best of their knowledge all the statements and representations made in the application information submitted is true and correct. Additionally, an Applicant must also agree to abide by the Commission’s Rules of Practice and Procedure, be subject to Public Utilities Commission sections 2108 and 2111. The Commission may impose the maximum penalties allowed under Public Utilities Code sections 108 and 2111 for failure to

meet the program and project compliance requirements, as determined by the Commission.

1.9. Evaluation Criteria

Applications will be evaluated based on meeting all the requirements in the Information Required from Applicants and Preference Checklist. Applicants are also required to conduct a pre and post implementation survey or report, and may submit endorsements or letters of support from the state or local government, community groups, and anchor institutions supporting their proposed adoption project. All applications will be reviewed, prioritized, and awarded based on completeness, overall quality, and project costs reasonableness.

1.10. Submission and Timelines

The Commission will begin accepting applications for grants from the Broadband Adoption Account on July 1, 2018. Please refer to the Commission's CASF website: <http://www.cpuc.ca.gov/casf/> for the application instructions and package for the Adoption Account.

Applications may be submitted at any time. However, staff will consider applications submitted on or before each deadline listed below as a batch, until all funds have been awarded. Note that these application deadlines will also be posted, and updated (if needed), on the Commission's CASF website:

<http://www.cpuc.ca.gov/casf/>

Deadlines:

- a. March 1, 2019
- b. August 1, 2019
- c. January 1, 2020
- d. July 1, 2020
- e. January 1, 2021
- f. July 1, 2021
- g. January 1, 2022
- h. July 1, 2022

Any deadline falling on a holiday or a weekend will be extended to the following business day.

Staff will post a list of applicants and projects submitted by the deadline on the CASF webpage. Further, where possible, staff will post regular updates on applications on the CASF webpage.

1.11. Expedited Review

Projects meeting the below criteria may be eligible for expedited review.

The Commission assigns to staff the task of approving applications that meet all of the following criteria:

- a. Applicant is proposing to serve a low-income population;
- b. Applicant is a local government, senior center, school, public library, nonprofit organization, or community-based organization with programs to increase publicly available or after-school broadband access and digital inclusion, such as digital literacy training programs;
- c. Applicant requests a grant of \$100,000 or less;
- d. Applicant agrees to perform education and outreach to educate the community of available broadband Internet services;
- e. Applicant's requested reimbursement for computing devices for community training rooms or other public space, is no more than \$750 per device, with a maximum of 15 devices per location;
- f. Project provides device technical support responses within 24 hours.
- g. Device technical support (not network), either by phone or in person, will be able to respond within 24 hours. Refurbished devices will have at least a six-month warranty. New devices will have at least a 30-day warranty.
- h. Applicant has identified a designated space for digital literacy training or broadband access;
- i. Applicants must be ready to provide classes within six months of being selected for a CASF grant and must submit a work plan with major milestones showing how they propose to meet this deadline; and
- j. Applicants must complete the adoption project within 24 months from the ramp up period, or earlier if work plan milestones/deliverables have been accomplished.

Additional Criteria for Digital Literacy Projects only

- a. Applicant or partner organization possesses at least one-year experience in digital literacy training or has previously carried out at least one digital literacy project;

- b. Applicant must provide at least eight hours of digital literacy training to each participant, through digital literacy classes, one on one tutoring or self-paced instruction; and

Applicant's requested reimbursement for take-home computing devices is no more than \$150 per device, limited to one computing device per eligible household, and no more than \$10,000 per application/project location.

1.12. Resolution Review

An application that does not meet the above expedited review criteria may still be considered for a grant via the traditional Commission Resolution approval process.

1.13. Staff Review

Staff shall notify an applicant by letter specifying reasons for rejection should an application fail to meet the Commission criteria or other factors.

1.14. Reporting

Staff will provide a template for all necessary reports in the Administrative Manual which will be posted on the CPUC CASF website, along with the Adoption Account Instructions and Application forms. Up to three reports will be required throughout the course of the project:

Ramp-up period report: A "ramp-up period report" is required (if applicable), after completion of the ramp up activities and when deployment is set to begin. This report must be submitted by no later than 3 months after the completion of the ramp up activities. In this report, recipients will report on the completion of the ramp up activities per the work plan, milestones met, as well as request payment for relevant expenses to date. The ramp up period may not exceed 6 months from the time the application is approved.

Year 1 Progress Report: The Year 1 progress report is required at the end of the first year of deployment. This report must be submitted by no later than 3 months after the end of the first year of deployment. In this report, recipients will report on the status of Year 1 milestones per the work plan, as well as request payment for relevant expenses to date.

Year 2 Completion Report: The Year 2 completion report is required at the end of the 24-month period, or after the work plan milestones/deliverables have been accomplished if earlier than the 24-month period. This report must be submitted by no later than 3 months after completion of the project. In this report, recipients will report on the completion of the overall project, milestones met per the work plan, as well as request payment for final and remaining relevant expenses.

The completion report shall include:

- a. A summary of all work done including an itemized list of materials purchased and money spent;
- b. A description of each milestone in the period and how that milestone was met.
- c. The total number of participants trained or hours of access provided, (if applicable); and
- d. The number of participants that subsequently subscribe to a broadband Internet service provider to use a device in their home.

Grantees must maintain files, invoices, and other related documentation for three years after final payment. Grantees shall make these records available to the Commission upon request and agree that these records are subject to audit and review by the Commission at any time within three years after the Grantee incurred the expense being audited.

1.15. Payment

- a. Grantees may submit up to three payment requests throughout the project period. Payment requests will accompany the 3 reports required above (Ramp Up Period (if applicable), Year 1, Year 2).
- b. The relevant project report must be submitted in order for a payment request to be granted.
- c. Payment request for the ramp-up period, if requested, may not exceed 25% of grant amount.
- d. All payments requests require documentation of outcome in "milestone" report.
- e. Grantees shall submit final requests for payment no later than 3 months after completion of the project.
- f. Payment will be based upon receipt and approval of invoices and other supporting documents showing the expenditures incurred for the project are in accordance with their approved application and budget.
- g. Grantees must notify the Commission as soon as they become aware that they may not be able to meet project deadlines.

- h. Payment will be made in accordance with, and within the time specified in California Government Code § 927 et seq.
- i. The Commission has the right to conduct any necessary audit, verification, and discovery during project implementation to ensure that CASF funds are spent in accordance with the terms of approval granted by the Commission.
- j. The recipient's invoices will be subject to audit by the Commission at any time within three years of final payment.

1.16. Execution and Performance

Grantees must start the project within six months after the grant approval (after the ramp-up time if applicable) and complete the project within a 24-month timeframe or earlier. The Commission may withhold or terminate grant payments if the grantee does not comply with any of the requirements set forth in its application and compliance with the CASF. In the event that the grantee fails to complete the project in accordance with the terms of approval granted by the Commission, the grantee must reimburse some or all the CASF funds that it has received.

The CASF grant recipient must complete all performance under the award on or before the termination date of the award.

Material changes in the entries for this application, such as discontinuing operation or bankruptcy, or change of name (DBA), change of address, telephone, fax number or E-mail address should be reported by a letter to the California Public Utilities Commission, Director of the Communications Division, 505 Van Ness Avenue, San Francisco, CA 94102 and CDCompliance@cpuc.ca.gov.

**Attachment 1
Preference Checklist**

- Project is serving a low-income community.**
The community with a median household income at or below the CARE income limits for a household of four¹⁶
- Project is serving a community with a high percentage of residents with limited English proficiency.**
More than 50% of residents have limited English proficiency
- Project is serving a community with a high percentage of residents with limited educational attainment.**
More than 50% of residents have only a high school diploma or less.
- Project is serving a rural community.**
A project is located in a "rural" area if it meets one of the following criteria:
 - 1) It is in area that is eligible for federal program under the United States Department of Agriculture (USDA) Section 515 program;
 - 2) It is in a city with a population of 40,000 or less or in a non-urbanized area;
or
 - 3) It is in an unincorporated area of a county and is not in an urbanized area.
- Project has community support, endorsements and/or partnerships.**
- Project is serving a community with some other demonstrated disadvantage which affects broadband adoption, documented by applicant.**
- Project considers coordination with other public purpose programs and funding sources.**

¹⁶ CARE income limits can be found here: <http://consumers.cpuc.ca.gov/lowincomerates/>.

Attachment 2
Consent Form

Name of Grantee: _____

The Grantee identified above hereby acknowledges receipt of the California Public Utilities Commission Resolution T-_____ or Approval Letter Dated _____ and agrees to comply with all grant terms, conditions, and requirements set forth in the Resolution or Approval Letter.

Undersigned representative of _____ [Name of Grantee] is duly authorized to execute this Consent Form on behalf of the Grantee and to bind the Grantee to the terms, conditions, and requirements set forth in California Public Utilities Commission Resolution T-_____.

Dated this ____ day of _____, 20__.

Signature

Printed Name

Title:

Organization or Name of Company

Business Address (include street address, suite/apt. number, city, state, and ZIP Code):

Telephone Number (include area code):

Email Address:

(End of Appendix 1)