

REPLY COMMENTS ON ASSIGNED COMMISSIONER RULING SETTING WORKSHOPS AND SEEKING COMMENT ON ELIGIBILITY FOR AND PRIORITIZATION OF BROADBAND INFRASTRUCTURE FUNDS FROM THE CALIFORNIA ADVANCED SERVICES FUND
Rulemaking 12-10-012 (Filed October 25th, 2012)

From: Joy Sterling
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Date: August 8th, 2018

Re: Order Instituting Rulemaking to Consider Modifications to the California Advanced Services Fund Rulemaking 12-10-012 (Filed October 25th, 2012)

Re: Eligibility: I support, as a step forward, re-defining a census block as CASF-eligible if the subscription rate within that census block is less than a majority (51%) of all households. However I am concerned about conflating subscription rate with access. Both are important.

I also advocate for going beyond the census block, using mapping technology to analyze data in a more precise, i.e. smaller geographic cell, and thereby seeing a more equitable representation.

Better data would tell us which homes and businesses have broadband and which don't, especially in sparsely populated areas, where the availability of broadband at one street address does not mean that every street address in the block is covered.

Re: Prioritizing Projects and Areas to Support: I feel the local consortia are in the best position to determine how to most effectively achieve 98% broadband coverage by region. The main difficulty seems to be the CAF II census blocks that are tied up by the incumbents, blocking competition. I do not believe that is the intent of AB 1665. The Gordian knot would be cut when the incumbents come forward with a clear picture of when and where they intend to build, so we can move forward.

The law charges the PUC with the responsibility of achieving 98% by region, giving the Commission the leeway to be more pro-active.

Re: Additional communities to suggest as priorities: I feel the Commission should prioritize projects in rural areas hit by fire disasters, earthquake and flooding.

Alongside economic development, I would include agriculture as an important consideration, especially with regard to water management – both monitoring and reporting. Note that starting Jan 1, 2019, the California farm water reporting program will require all water agencies in the state report their water deliveries by groundwater basin, **on line**.

There is an urgent need to connect county fairgrounds with high speed, wired broadband as part of public health and safety measures. County fairgrounds throughout the state serve as a critical resource (staging ground, shelters, et al.) during emergency situations. These fairgrounds, often located in rural areas, need wired broadband capacity to support critical operations during an emergency. The CASF

should be modified to provide a direct allocation to the Governor's Office of Emergency Services (OES) to deploy wired broadband in county fairgrounds. An alternative to fairgrounds could be OES locations across the state.

Re: Providing Access to Broadband Service to Areas Adjacent to CAF II Areas: I have no problem helping the providers leverage their CAF II funding to tie in with CASF funding as an innovative way to fill the “holes”. The best incentive would be expedited review so the providers can meet their federal deadlines. And, this should allow for a new level of transparency such that areas where CAF II providers do not commit to build out can be reclassified as eligible.

Re: Issues Related to Line Extension: This aspect of the program could be used to provide the broadband for 21st century agricultural needs, i.e. Ag Tech, Precision Farming, “connectivity to the head of lettuce”, which are becoming increasingly essential as state requirements for reporting on water use, etc. become more stringent and significant in adapting to climate change, as well as for developing clean, renewable energy like biomass, which needs to be in farm areas to be effective. Large windmill installations and solar arrays also need to be in rural areas.

I would like to conclude with a few personal observations: This year marks my family’s 42nd vintage growing grapes, making wine and living in rural Sonoma County. Over time, San Francisco has become further and further away. Just as the rivers, then the railroad lines and then the highways brought along development, so too can the “information highway” in our rural areas, especially as a growing population gets pushed out of the cities. We saw this last October, when families displaced by wildfires moved into temporary housing only to find how limited they were in terms of coverage just a few miles west of Santa Rosa.

Finally, I want to acknowledge Commissioner Guzman-Aceves for her leadership in trying to make more progress, quick and CPUC staff for their efforts to streamline the process to make it more effective.

Thank you very much for your time and consideration,

Joy Sterling
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California Food and Agriculture Board Member*
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*Titles are for identification purposes only.