

**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

**CALIFORNIA CABLE AND TELECOMMUNICATIONS ASSOCIATION
REPLY COMMENTS ON THE PROPOSED DECISION IMPLEMENTING
THE CALIFORNIA ADVANCED SERVICES FUND LINE EXTENSION
PROGRAM PROVISIONS**

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April 22, 2019

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The California Cable and Telecommunications Association (“CCTA”),¹ pursuant to Rule 14.3 of the California Public Utilities Commission’s (“CPUC”) Rules of Practice and Procedure, hereby submits these reply comments in response to comments filed by other parties on the Proposed Decision (“PD”) issued on March 26, 2019 in the above-captioned proceeding to implement the line extension program within the California Advanced Services Fund (“CASF”).

CCTA is concerned with comments made by Frontier Communications (“Frontier”) regarding who is required and/or permitted to file an application to obtain a CASF line extension grant.² The PD states that the CPUC “will allow for facilities-based providers to apply on behalf of an individual household and/or group of households.”³ Rule 3 in Appendix 1 of the PD defines an “eligible applicant” as “the customer residing at the location to be served” and states that “[a] representative, including a facilities-based broadband provider, may apply for service on behalf of an eligible applicant or a group of eligible applicants.”⁴

¹ CCTA is a trade association consisting of cable providers that have collectively invested more than \$40 billion in California’s broadband infrastructure since 1996 with systems that pass approximately 96% of California’s homes.

² See Frontier Comments at 3.

³ PD at 11.

⁴ PD Appendix 1 at 2.

Frontier states that it strongly objects to the “proposal that the facilities-based providers should be encouraged to apply on behalf of the individual/household or group of households,” claiming that “these administrative processes only serve to divert more precious resources that could be better leveraged on the focus of planning the potential build.”⁵ Frontier further states that the responsibility of guiding individuals or groups through the application process “is best handled by the local consortia.”⁶

CCTA disagrees with Frontier’s interpretation of the PD. To the contrary, CCTA understands the PD and rules to merely *allow* any representative, including a broadband provider, to apply on behalf of an eligible applicant -- not *require* or encourage the representative to do so. CCTA believes that allowing, but not requiring, a provider to submit an application is appropriate and allows flexibility based on individual circumstances. CCTA would object, however, to any modification to the PD or the rules, as Frontier seems to recommend, that would require the consortia to have responsibility for handling line extension applications. The most important role for consortia is to help develop infrastructure projects to meet the overriding CASF program goal of providing funding for infrastructure projects to provide broadband access to 98% of California households in each consortia region by December 31, 2022.⁷ The CPUC has seven consortia with active, approved work plans aimed at achieving the statutory program goal.⁸ Consortia should not be diverted from their work to ensure that the CPUC meets this goal. Finally, CCTA notes that no consortia filed comments on the PD requesting that it be assigned this responsibility.

⁵ Frontier Comments at 3.

⁶ Frontier Comments at 3.

⁷ Public Utilities Code Section 281(b)(1)(A).

⁸ See <http://www.cpuc.ca.gov/General.aspx?id=870>.

Respectfully submitted,

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