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Sacramento, CA 95814

**SENT VIA ELECTRONIC MAIL**

June 8, 2020

Robert Osborn  
Director, Communications Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Challenge to Hunter Communications Mendocino County CASF Application**

Dear Mr. Osborn:

Frontier Communications Inc. (U-1002-C) (Frontier), pursuant to Section 281(b)(2) of the Public Utilities Code, hereby submits to the California Public Utilities Commission (Commission) a challenge to the pending application of Hunter Communications for an infrastructure grant of \$290,327,940 from the California Advanced Services Fund (CASF) for the Mendocino County Project.

The Mendocino County Project Summary proposes to serve census blocks that reside within a Connect America Fund (CAF II) area before July 1, 2020, which is explicitly prohibited in Section 281(f)(5)(c) of the Public Utilities Code:

“Except as provided in clause (ii), until July 1, 2020, the project is not located in a census block where an existing facility-based broadband provider has accepted federal funds for broadband deployment from Phase II of the Connect America Fund, unless the existing facility-based broadband provider has notified the commission before July 1, 2020, that it has completed its Connect America Fund deployment in the census block.”

Thus, Hunter Communications’ broadband infrastructure grant application is not eligible as it resides in a CAF II region that was not forfeited by Frontier, and the proposal was submitted before July 1, 2020. Although this is sufficient evidence for this challenge to be upheld, Frontier would like to note that it is already constructing a build in the proposed census blocks that will be completed in 2020. This build will expand broadband service to residential households within the specified census blocks at or above the CASF served speed requirement of at least 10/1 Mbps. It is for these reasons that Frontier must challenge this application.

D.18-12-018 requires that providers submit more detail in support of a challenge, including confidential information regarding:

- The geographic location of all households that are served. This information shall be provided in a plain-text, comma-separated values (CSV) file, that contains geo-located street address information, including latitude and longitude coordinates.

- Customer billing from one subscriber in each census block challenged indicating that the customer received served speeds at least one day prior to the application filing.
- An attestation that the households identified in (a) are offered service and have the capability to receive minimum speeds of 6 Mbps download and 1 Mbps upload.

Because these census blocks are ineligible for CASF funding, Frontier is not required to provide address and billing information in this challenge. The completed CAF II locations will be reported in Frontier’s 2020 year-end reporting to the FCC, in which the CPUC receives a copy.

Below are the CAF II census blocks from the grant that should be disqualified:

60450101003062	60450101003039	60450101001222
60450101003075	60450101001688	60450101001742
60450101003052	60450101002049	60450101003065
60450101001676	60450101002003	60450101002030
60450101002022	60450101003032	60450101002002
60450101003060	60450101003034	60450101002035
60450101003018	60450101002009	60450101002028
60450101003029	60450101002011	60450101002001
60450101001232	60450101001797	60450101002055
60450101001784	60450101002031	60450101003026
60450101003040	60450101003059	60450101002006
60450101002000	60450101002026	60450101001675
60450101003028	60450101003084	60450101003021
60450101003072	60450101003056	60450101003011
60450101003030	60450101002024	60450101001679
60450101001693	60450101002007	60450101001225
60450101003054	60450101002058	60450101003033
60450101002051	60450101002025	60450101002038
60450101002059	60450101002027	60450101002047
60450101003036	60450101002021	
60450101002029	60450101002054	

Thank you for your consideration of this challenge, and please contact me with any questions at 916-683-7989 or [amy.warshauer@ftr.com](mailto:amy.warshauer@ftr.com).

Respectfully submitted,



Amy Warshauer  
Manager, Government and External Affairs