



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 RULING REQUESTING
COMMENTS ON BROADBAND INFRASTRUCTURE
RULES AND APPLICATION WINDOWS**

Summary

In this ruling, we inform stakeholders that the April 1, 2020 deadline for the California Advanced Services Fund (CASF) Infrastructure Grant applications to be filed has been moved to May 4, 2020. Further, this ruling requests comment on 1) CASF actions to consider in response to COVID-19; 2) Closing this rulemaking and opening a new one; 3) Opening a second application window for CASF Infrastructure Grant applications in Connect America Fund II (CAF II)¹ census blocks in 2020; 4) Authorizing Staff to establish additional Infrastructure Application Deadlines in 2020 and future years; 5) Leveraging federal, state and local funding programs such as the Federal Communication Commission's Rural Digital Opportunity Fund (RDOF)²; 6) Establishing a rolling application window for 2.5 GHz spectrum deployments in tribal areas; 7) Creating a waiver process and revising Ministerial Review rules; 8) Revisions to cost reimbursement

¹ See Connect America Fund (CAF), et al., Report and Order, FCC 14-190 (December 18, 2014).

² See RDOF; CAF, Order, FCC 20-5 (Feb. 7, 2020).

process, invoicing and payment processing; and 9) Changes related to the CASF Line Extension Program.

In addition, this ruling provides notice and opportunity for parties to comment on proposed modifications and clarifications to the CASF Broadband Public Housing Account (BPHA) Application Requirements and Guidelines attached to this ruling as Appendix 1.³ Parties' comments on the BPHA are limited to Appendix 1 and shall be organized by heading of each section of the Requirements and Guidelines where applicable.

Opening Comments to Question 1 on actions to consider in response to COVID-19 may be filed and served on the service list no later than Thursday March 26, 2020 and reply comments to Question 1 no later than Wednesday April 1, 2020.

Comments to all other questions and the Appendix in this ruling may be filed no later than Wednesday April 15, 2020 and reply comments Monday April 27, 2020.

Opening Comments on all other questions may be filed and served on the service list no later than Wednesday April 15, 2020 and Reply Comments may be filed and served on the service list no later than Monday April 27, 2020. The California Public Utilities Commission (Commission or CPUC) plans to issue a Proposed Decision modifying the Infrastructure, Line Extension, and Public Housing Accounts based on the comments to the instant ruling and the record in this proceeding during the second quarter of 2020.

³ All proposed revisions and modifications specific to the BPHA Application Requirements and Guidelines are incorporated herein and is attached as Appendix 1.

1. Background

The purpose of the CASF is to encourage deployment of broadband communication services to unserved and underserved areas of California by providing qualified service providers with financial grants to construct infrastructure projects that will provide broadband access to no less than 98% of California households in each region as identified by the Commission.

On October 15, 2017, the Governor signed Assembly Bill (AB) 1665 (Garcia).⁴⁵ The LEP program subsidizes the cost of connecting an individual household or property to an existing or proposed facility-based broadband provider. AB 1665 limits funds to households based on income; funds are intended for households that would not otherwise be able to afford a line extension to the property. In the calendar year 2019, the Commission received only one Line Extension application.

The Commission adopted the BPHA Application Requirements and Guidelines in D.14-12-039. On June 21, 2018, the Commission issued D.18-06-032 which implemented pragmatic changes to the CASF program including the BPHA. The BPHA provides grants for broadband connectivity and adoption in publicly supported housing communities (PSCs). The moneys set aside for broadband adoption have been fully committed. Less than half of the money available for broadband connectivity (infrastructure) projects has been awarded. Any money from the BPHA not awarded by December 31, 2020, shall be transferred back to the Broadband Infrastructure Account. Currently, only half the money allocated for public housing infrastructure projects has been awarded.

⁴ Ch. 851, Stats. 2017. AB 1665 is codified at Pub. Util. Code Section 281.

⁵ Decision Implementing the CASF Line Extension Program Provisions [D.19-04-022] (2019).

Only one application has been received since the statute was amended requiring that a PSC must be “unserved.”⁶

2. Questions for Comment

The Commission seeks parties’ input on the following proposed suggestions, questions, and modifications set forth below:

1. Actions to Consider in Response to COVID-19

Question 1. In the context of the CASF, what can and should the Commission do in response to COVID-19? For example, should the Commission –

- begin awarding Adoption grants on a rolling basis?
- increase the amount of up-front funding for Adoption grantees to improve the ability of grantees to increase broadband adoption?
- expeditiously make hotspots available through the Adoption account?
- make changes to the tasks assigned to staff?

And if so, how would any modifications be implemented?

2. Future Activities in this Proceeding

The Commission will consider closing this proceeding with a decision implementing these changes and opening a new rulemaking to take comment on a range of CASF topics targeting the second quarter of 2020.

Question 2. Should the Commission close this proceeding and open a new rulemaking to consider rules established in prior CASF decisions?

⁶ Senate Bill 745 (Hueso), Stats. 2016, ch. 710 amending Pub. Util. Code, §§ 281 and 914.7, effective January 1, 2017, adopted in Resolution T-17575 (issued August 28, 2017).

3. Potential Additional Application Window in 2020

Pub. Util. Code section 281(f)(5)(C)(i) prohibits awards in census blocks where a provider had accepted federal CAF II support:

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.

To be eligible for CASF funding, the “Connect America Fund II” census blocks (referenced above) must be unserved per CASF criteria and are subject to all other program rules.

Question 3. Should those applying for CASF infrastructure grants in areas in which carriers accepted CAF II federal funds but did not deploy service have their CASF application deadline extended to July 15, 2020?

Question 4. In addition to the CAF II program, provide comments on other similar federal funding programs,⁷ such as the RDOF, that may affect the 2020 CASF application process. For example, the RDOF Phase I Reverse Auction (Auction 904) of Federal Communications Commission (FCC) is slated to begin October 22, 2020.⁸ Staff estimates the FCC “Short Form” filing deadline for participation in Auction 904 will be set by FCC for approximately August 22, 2020. If the Commission were to provide financial incentive via CASF grants to bidders seeking RDOF funding for areas in California, could the

⁷ See USDA ReConnect Grant and Loan Program: <https://www.usda.gov/reconnect>

⁸ Par 1, *Public Notice, Comment Sought on Competitive Bidding Procedures and certain Program Requirements for the Rural Digital Opportunity Fund Auction (Auction 904)*, FCC 20-21; AU Docket No. 20-34, WC Docket No. 19-126, WC Docket No. 10-90 (rel. March 2, 2020)

Commission inform bidders prior to the Short Form deadline, or by a later date prior to the opening of Auction 904, that winning bidders for California areas will be awarded CASF grants contingent upon certification by FCC of winning bids? How would this process work?

Question 5. How should the CASF Infrastructure Application review timeline in D.18-12-018 be adjusted to accommodate the additional application window? At this time, the rules contained “deemed denied” language if applications are not acted upon by October 1st.⁹ Should that language be modified, and if so how?

Question 6. The Commission is considering using CASF funds for technical assistance to consult with California tribes, “regional consortia, stakeholders, local governments, existing facility-based providers, and consumers” on ways to maximize RDOF, CASF, and other potential broadband investments in their communities in order to develop strategies and achieve the CASF goal to increase broadband access in Pub. Util. Code section 281(b)(1)(A). In particular, to support California tribes that need technical assistance in order to determine whether to pursue federal and state broadband grant funding. Should the Commission consider such a proposal? If so, how best could such a proposal be implemented? For example, should the technical assistance be capped at a certain amount, such as \$100,000 per technical assistance recipient? Should the overall amount be capped (*e.g.*, not to exceed \$10 million)?

⁹ If by October 1 an application has not been approved by Staff under its Ministerial Review authority, nor has Staff published a Draft Resolution recommending Commission approval, the application is deemed denied, without prejudice, so that it may be eligible next year. (*See* D.18-12-018, at 61.)

4. CASF Infrastructure Application Windows and Staff Delegation

In D.18-12-018, the Commission also delegated to Communications Division Staff (Staff) authority to set an additional CASF Infrastructure Application window. The Commission delegates to Staff the option, but not the obligation, of opening a second shortened additional application round in a year.

Question 7. Should the Commission increase the Staff's delegated authority to set additional infrastructure application windows?

Question 8. Should the Commission assign Staff's authority to specify whether Applications submitted during additional rounds must meet the criteria outlined in the Ministerial Review section of the rules?¹⁰ If so, how should the Ministerial review process and criteria be revised to ensure the timely processing of CASF Infrastructure Grant applications? For instance, should any application submitted during additional application windows that receive a complete and timely challenge be automatically denied?

5. Federal Funds and Other Funding Sources

We must also consider the impact of other current and future federal, state and local programs on our ability to grant funding using the CASF Infrastructure account.

Pub. Util. Code Section 281 (f)(12) further prohibits awards in census blocks where a provider had accepted other federal funding:

¹⁰ D.18-12-018, Appendix, Rule 12 Ministerial Review, at 26.

A grant from the Broadband Infrastructure Grant Account shall not include funding for costs of broadband infrastructure already funded by the Connect America Fund program or another similar federal public program that funds that infrastructure. This paragraph does not apply to funding from the federal high-cost support programs that support operations, including High Cost Loop Support (HCLS), Connect America Fund-Broadband Loop Support (CAF-BLS), or the Alternative Connect America Cost Model (A-CAM).

For example, the Commission is actively engaged with the federal rulemaking to consider the Federal Communications Commission's RDOF.¹¹ The RDOF, through a two-phase reverse auction mechanism, will direct \$20.4 billion dollars nationally over 10 years to finance up to gigabit speed broadband networks in areas without broadband service.

We are seeking input as to the relationship between programs such as RDOF and the CASF infrastructure grant program. In particular, on the extent to which the CASF Infrastructure account rule changes can support federal – state allowances and partnerships providing for cost-effective leveraging of funds needed to invest in rural broadband networks in the under- and un- served areas of California. This type of fiscally responsible federal – state sharing of the costs of rural broadband infrastructure as proven successful in other states, like

¹¹ Following the issuance by FCC of its Notice of Proposed Rulemaking on RDOF (rel. August 2, 2019, NPRM), CPUC engaged in multiple communications on the record of the proceeding. CPUC President Batjer issued a letter to FCC Chairman Pai (rel. January 22, 2020). CPUC issued Comments, and Reply Comments; conducted Ex Parte meetings in Washington among CPUC Commissioners (Guzman Aceves, Randolph, and Shiroma) and staff, and FCC Commissioners (Carr, Rosenworcel, and Starks), FCC Commissioners' Advisors, and staff; and conducted 7 Ex Parte telephonic conferences among staff of CPUC's Communications Division, the Telecommunications Advisor to Commissioner Guzman Aceves, counsel of the Legal Division, and FCC staff.

New York,¹² and Pennsylvania.¹³ FCC allowance for rules-based incentives for these initiatives are among the key features of the RDOF Program CPUC has recommended throughout the RDOF public comment rounds.¹⁴

In addition to the above referenced Pub. Util. Code Section 281 (f)(12), we seek comment on any other rules or provision of Pub. Util. Code § 281 which may limit the use of CASF Infrastructure funds as “matching,” “stacking,” or otherwise leveraged funds for the award of broadband infrastructure federal grants or loans in the same proposed project funding areas, or at the same proposed funding eligible Census geographies or “locations.” For example, does the funding eligibility broadband speed threshold of 6 Mbps (Megabits per second) down /1 Mbps up in Pub. Util. Code § 281 (f)(5)(A) limit the federal – state joint funding or matching efficiency discussed above? Does the CASF speed eligibility threshold limit the ability to get federal funds for networks that may warrant investment in areas currently served at speeds of 6 Mbps down /1 Mbps up to 25 Mbps down /3 Mbps up?

Question 9. Does Pub. Util. Code section 281 (f)(12) and (f)(5)(A) (cited above) or any other provision of Pub. Util. Code § 281 prohibit a CASF Infrastructure applicant from receiving both federal (such as from the RDOF) and state CASF funds for the same project for which the applicant seeks CASF Infrastructure funding?

¹² See The NYS Broadband Program Office: <https://nysbroadband.ny.gov/>

¹³ See The Pennsylvania Broadband Investment Incentive Program: <https://www.governor.pa.gov/newsroom/governor-wolf-announces-initiative-expand-broadband-access-round-up/>

¹⁴ See generally Comments of the California Public Utilities Commission, In the Matter of RDOF; CAF, WC Docket Nos. 19-195, 10-90, (filed September 20, 2019) (CPUC Comments).

Question 10. Should the Commission prioritize, streamline, or make available on a contingency basis CASF infrastructure funding for projects that receive federal funding?

Question 11. Should the Commission require CASF awardees to bid for RDOF?

Question 12. Should the Commission set aside a CASF budget for RDOF bidders proposing to bid in the RDOF auctions for eligible California areas? And if so, what should be the appropriate set aside?

Question 13. Can and should CASF be used to match other grants including local government grants?

Question 14. Can and should CASF be used to provide no-interest for a term or low-interest loans to deploy broadband in a manner more flexible than provided for by the CASF revolving loan account?

6. Rolling Acceptance for CASF Infrastructure Applications to Deploy 2.5 GHz Tribal Priority Window Spectrum

The Federal Communications Commission adopted a tribal priority window for rural, federally recognized tribes to apply for 2.5 GHz spectrum over their tribal lands.¹⁵ The tribal priority window was set for February 3, 2020 to August 3, 2020.

Question 15. Rolling Tribal Priority Window Infrastructure Applications. Is there a reason that infrastructure applications to deploy at least one location using 2.5 GHz spectrum (obtained through the tribal priority window) should not be accepted on an ongoing basis? How would the Commission review and process these rolling CASF infrastructure applications in light of the timeline and updates to the Broadband Availability Map?

¹⁵ Transforming the 2.5 GHz Band Report and Order WT Docket No. 18-120.

7. Notice of Intent

Incomplete CASF Infrastructure Applications in recent years have required correspondence and revisions in consultation with staff. Interested entities and stakeholders have contacted staff to better understand the process. Further, a streamlined process to improve CASF applications given potential additional application windows in 2020 and the potential for multiple application windows in the future, seems reasonable. This in mind, we seek comment on an informal “notice of intent” filing for interested providers to inform Staff of their interest in filing a CASF application.

Question 16. Should Staff provide a notice of intent form and process for applicants to apply for CASF infrastructure grants to better gauge the level of interest in grants, improve application quality, and improve customer service and interaction with the applicant? If so, what should the notice of intent form include and what should the process look like?

Question 17. Should the notice of intent be limited to CAF II locations only or be utilized in future application cycles?

8. Rules Regarding Waiver Process

CASF Infrastructure Applicants have occasionally asked for a waiver from certain rules established in D.18-12-018 or procedures.¹⁶ In addition, entities – including some without a certificate of public convenience and necessity (CPCN) – have expressed interest in applying for CASF infrastructure grants. To encourage and facilitate these entities applying for CASF Infrastructure grants in 2020 in an orderly and reasonably transparent way, we take comments on clarifying and laying out a waiver process.

¹⁶ See, e.g., Resolutions T-17680 and T-17408 granted rules waivers to Charter Communications granted Inyo Networks, respectively.

Question 18. To facilitate these applications should a request for waiver or inapplicability of certain requirements be filed with an application? Should the Commission eliminate or change the current rules and requirements? These requirements would include but are not limited to:

- a. Who May Apply;
- b. Letter of Credit Requirement for non-CPCN holders;
- c. Pricing Commitment; and
- d. Financial Qualifications.

9. Ministerial Review

The current rules contain the Ministerial Review process which Staff has the delegated authority to approve applications, including determinations of funding, that meet all of the following criteria:¹⁷

1. Applicant meets the program eligibility requirements.
2. The application is not challenged, or Staff has determined that the project area is unserved.
3. The total grant does not exceed \$10,000,000.
4. The project must be California Environmental Quality Act exempt, or approval letter must state that authorization to construct and release funds will be provided in a forthcoming resolution.
5. There must be no competing applications for the same project area in the same application period.
6. Costs per household are low:
 - a. For projects building wireline connections, proposed project costs \$9,300 per household or less.
 - b. For fixed wireless projects, proposed project costs \$1,500 per household or less. The Ministerial Review criteria and process appear to be narrow. Of the 13 projects submitted in the 2019 application cycle,¹⁸

¹⁷ D.18-12-018, Appendix 1 at 26-27.

¹⁸ <https://www.cpuc.ca.gov/General.aspx?id=1040>.

none met the Ministerial Review criteria. Applications not meeting these criteria may only be approved by the Commission via resolution, which usually adds more time.

Question 19. Should the Ministerial review process and criteria be revised to ensure the timely processing of CASF Infrastructure Grant applications?

Question 20. Should Ministerial review processes and criteria be amended to provide staff with additional delegated authority in review and approval of CASF applications? If so, how?

10. Reimbursement and Payment Process

Current projects in which fiber-to-the-home infrastructure is deployed requires specific equipment at each customer location. There is a discrepancy between the number of households/locations served (or potential locations) and the actual number of households/locations that subscribe to service. Staff is concerned that reimbursement for equipment that is not being deployed is an inefficient use of CASF funds and might lead to waste of expensive electronic resources such as optical network terminals, batteries, network enclosures, and other variable cost items.

Question 21. Should the CASF reimbursement process change? Should grantees be required to provide a potential “take rate” of subscribers (a subset of total potential households served) and be reimbursed accordingly based on actual subscriptions? Should there be a statute of limitations in which CASF funds can be used to connect new subscribers that did not sign up during the initial deployment of the project?

Question 22. Changes to invoice, billing and payment processes.

Should Staff be assigned the authority to standardize the invoice/billing template for payment requests? Are there any other rule changes that would

help staff and grantees streamline the payment process and reporting requirements?

11. Line Extension Program Changes – Income Threshold

In D.19-04-022, the Commission set an income threshold and specified that applicants who qualify for “the California LifeLine or California Alternative Rates for Energy (CARE) programs automatically meet the qualifying income threshold” and those not enrolled with “a household income equivalent to the CARE program’s income guidelines” qualify.

Question 23. Should the line extension income threshold be increased? If so, to what level? Should income qualification be confirmed by customer attestation or self-certification?

Line Extension Program Changes – Definition of “Non-connected Household”

A non-connected household defined as “a household that does not have a service connection to any broadband service”¹⁹ differs from an unserved household which is defined as “a household for which no facilities-based broadband provider offers broadband service at speeds of at least 6 megabytes per second (Mbps) downstream and 1 Mbps upstream”²⁰ Under current rules, Line Extension Grant funding can only be granted if a household is unserved – **and** – non-connected.

Question 24. Should the requirement “of non-connected household” for LEP eligibility be removed? Why or why not?

¹⁹ Rulemaking 12-10-012, Appendix 1, “CASF Broadband Infrastructure Grant Account Line Extension Program Pilot Application Requirements and Guidelines” at 2.

²⁰ Pub. Util. Code, § 281(b)(1)(B).

12. Public Housing Account²¹

All eligible PSCs must be unserved housing developments. An unserved housing development is defined as a housing development where at least one housing unit within that housing development is not offered broadband internet service. As currently defined in D.18-06-032, a housing unit is “not offered broadband internet” if the unit does not have access to a commercially available broadband internet service.²² Based on our experience with the program and previous application cycles, we proposed that the definition of “not offered broadband internet” be modified to state that a housing unit is “not offered broadband internet” if an internet service provider (ISP) already provides access to all units on the property in question.

No explicit challenge process is currently defined in D.18-06-032. Staff propose that a new challenge process be introduced to allow for an ISP to challenge an application based on an ISP’s claim that it already serves 100 percent of the residents at the property or that an ISP was denied access to the property for the provision of broadband internet services. Such a challenge would need to be supported by information about the customers and the services offered by an ISP at the project location (in line with confidentiality requirements), and the proof or evidence showing that it has adequate broadband internet capacity to serve all units at a required speed.

Staff clarified and elaborated on the project submission and reporting requirements to better assist applicants in their project submission and in meeting their reporting requirements. Staff made additional changes to the

²¹ See fn 1.

²² D.18-06-032, Appendix 2, at 3.

entire BPHA Application Requirements and Guidelines document (Appendix 1) in order to clarify processes and procedures.

Question 25. Parties are welcome to comment on Appendix 1.

IT IS RULED that:

1 Comments are solicited regarding the proposed questions and modifications to the California Advanced Services Fund Infrastructure Account, Line Extension Program and the Broadband Public Housing Account Application Requirements and Guidelines (Appendix 1).

2 Opening Comments on Question 1 may be filed and served on the service list no later than Thursday March 26, 2020.

3 Reply Comments on Question 1 may be filed and served on the service list no later than Wednesday April 1, 2020.

4 Opening Comments may be filed and served on the service list on all the other questions and Appendix 1 outlined in this ruling no later than Wednesday April 15, 2020.

5 Reply Comments may be filed and served on the service list on no later than Monday April 27, 2020.

6 The Commission plans to issue a Proposed Decision modifying the Infrastructure, Line Extension, and Public Housing Accounts based on the comments to the instant ruling and the record in this proceeding during the second quarter of 2020.

Dated March 26, 2020, at San Francisco, California.

/s/ MARTHA GUZMAN ACEVES

Martha Guzman Aceves
Assigned Commissioner

Appendix 1

APPENDIX 2
Broadband Public Housing Account
Revised Application Requirements and Guidelines

I. Background

AB 1299 (Bradford) was signed into law on October 3, 2013. AB 1299 expanded the CASF Program by adding a fourth account, the Broadband Public Housing Account (BPHA), dedicated to broadband access and adoption in publicly supported communities (PSCs).

In 2016 the Legislature passed SB 745 (Hueso). SB 745 extended the date when remaining funds from the BPHA are transferred back to other CASF Accounts from December 31, 2016, to December 31, 2020. SB 745 further limited the Commission's awarding of grants for BPHA infrastructure projects to only unserved housing developments.

In 2017, the Legislature passed AB 1665 (Garcia) that authorized PSCs eligible for funding via the BPHA, only after all funds available for the BPHA have been awarded, to submit a CASF application for funding from the Broadband Infrastructure Account and/or Broadband Adoption Account.

II. Amount Available for Grants

The BPHA provides \$20 million for grants and loans to finance infrastructure projects connecting PSCs with broadband Internet. The Account provides \$5 million for adoption projects for residents in PSCs. To date, the \$5 million allocated for grants for PSCs has been fully committed. Therefore, the Commission can no longer accept applications for these projects unless the statutory cap is raised. However, eligible PSCs can apply for funds for broadband adoption projects from the CASF Broadband Adoption Account.

The Commission will award grants to finance up to 100 percent of the costs to install inside wiring¹ and broadband network equipment but will not finance operations and maintenance costs.

The Commission will reimburse the following project-related expenses after a review of the project progress or completion reports and supporting documentation:

- All broadband networking equipment (hardware and software), wireless access points, wireless bridge(s), modem(s), switches, router(s), and

¹ Telephone wiring inside a residential unit or multi-dwelling unit (MDU) building.

- firewall(s) for network security but not personal computers, laptops, handheld or human interface devices.
- Low voltage contracting work including the installation of inside wiring, network cabinets, NEMA boxes², conduits, patch panels, cable tray or ladders, and other cabling requirements to provide power and connectivity for the broadband network equipment funded as part of the project. Major rehabilitation, demolition or construction work will not be funded.
 - Broadband network engineering and designing documentation.
 - Hardware warranty of broadband network equipment as needed.
 - Installation, provisioning, and configuration labor costs at the Minimum Point of Entry (MPOE), MDFs (Main Distribution Frame), IDFs (Intermediate Distribution Frame), WAPs (Wireless Access Point), Wireless Bridges such as P2P and P2MP (Point to Point and Point to Multi-point) Radios, Switched Ethernet, and xDSL (Digital Subscriber Line) modems.
 - Taxes, shipping and insurance costs (if applicable) that are directly related to broadband network equipment deployed under the BPHA.

For wireless networking projects, equipment must meet at least the 802.11n standard³. For wireline networking projects, equipment must meet at least ADSL2+ standard⁴ or the 10BASE-X standard⁵.

III. Definitions

“Project” is a publicly subsidized multifamily housing development that is requesting funds under one application from the BPHA.

“Publicly subsidized” means either that the housing development receives financial assistance from the United States Department of Housing and Urban Development (HUD) pursuant to an annual contribution contract or is financed

² The [National Electrical Manufacturers Association](#) defines standards used in [North America](#) for various grades of [electrical enclosures](#) typically used in industrial applications.

³ A widely used wireless computer networking protocol standard by IEEE (The Institute of Electrical and Electronics Engineers) for Wi-Fi communication that operates on 2.4 GHz and 5 GHz frequency bands.

⁴ G.992.5 is an ITU-T (International Telecommunication Union - Telecommunication) standard for asymmetric digital subscriber line (ADSL) broadband Internet access with a maximum theoretical download speed of 24 Mbit/s and an upload speeds of 3.3 Mbit/s can be achieved.

⁵ Classic Ethernet is a family of first generation 10 Mbit/s Ethernet standards. 10 represents its maximum throughput of 10 Mbit/s, BASE indicates its use of baseband transmission, and X indicates the type of medium used.

with low-income housing tax credits, tax-exempt mortgage revenue bonds, general obligation bonds, or local, state, or federal loans or grants and the rents of the occupants, who are lower-income households, do not exceed those prescribed by deed restrictions or regulatory agreements pursuant to the terms of the financing or financial assistance.

“Publicly supported community” (PSC) is a publicly subsidized multifamily housing development that is wholly owned by either of the following:

(i) A public housing agency that has been chartered by the state, or by any city or county in the state, and has been determined to be an eligible public housing agency by the United States Department of Housing and Urban Development.

(ii) An incorporated nonprofit organization as described in Section 501 (c)(3) of the Internal Revenue Code (26 U.S.C. Sec. 501(c)(3)) that is exempt from taxation under Section 501 (a) of that code (16 U.S.C. Sec. 501(a)) and that has received public funding to subsidize the construction or maintenance of housing occupied by residents whose annual income qualifies as “low” or “very low” income according to federal poverty guidelines.

A “minimum point of entry” (MPOE) is either the closest practicable point to where the wiring crosses a property line or the closest practicable point to where the wiring enters a multiunit building or buildings.

An “unserved” housing development is a housing development where at least one housing unit within the housing development is not offered broadband Internet service.⁶ A housing unit “is not offered broadband Internet service” if an ISP already provides access to all units on the property in question.⁷

IV. Eligible Applicants

CASF Broadband Public Housing Account funding is limited to an eligible publicly supported community (PSCs) owned by either of the following two entities:

- A public housing agency that has been chartered by the State, or by city or by county in the State, and has been determined to be an eligible public

⁶ Pub. Util. Code, § 281(i)(3)(B)(i) and (ii).

⁷ The applicant must attest that the project meets this definition and the ISP must demonstrate, in the challenge process, that the ISP already provides access to all units on the property in question.

- housing agency by the United States Department of Housing and Urban Development.
- An incorporated nonprofit organization as described in Section 501 (c)(3) of the Internal Revenue Code (26 U.S.C. Sec. 501(c)(3)) that is exempt from taxation under Section 501 (a) of that code (16 U.S.C. Sec. 501(a)) and that has received public funding to subsidize the construction or maintenance of housing occupied by residents whose annual income qualifies as “low” -or “very low” income according to federal poverty guidelines.

Non-profit housing developers involved in limited partnerships with for-profit entities participating may also be eligible since the IRS considers an exempt organization's participation as a general partner in a limited partnership with for-profit limited partners as consistent with the organization's exempt status under Internal Revenue Code Section 501(c)(3).

For PSCs applying for infrastructure funds, a PSC may be eligible for funding only if the PSC can verify to the Commission that the PSC has not denied a right of access to any broadband provider that is willing to connect to a broadband network to the facility for which the grant or loan is sought⁸ and the publicly supported community is unserved as defined in Section III.

V. Information Required from Applicants

In order to be reviewed, Applicants must submit the following information to the Commission for each proposed project. Application forms can be found on the CASF BPHA webpage. Applications and supporting material must be submitted online with a hard copy mailed to the CASF Housing Account Coordinator and one sent to the Office of Ratepayer Advocates. Staff will post a list of applications submitted by the deadline on the CASF webpage.

A. Infrastructure Project Application

Applicants must complete and submit a project application form. Staff will post all project summaries on its website after the date of application submission and will notify the CASF Distribution List⁹ of the submission(s), allowing ISPs three weeks from the date of posting the application to challenge an application as discussed in Section VIII.

⁸ Pub. Util. Code, § 281(i)(3)(A).

⁹ The CASF Distribution List is maintained by Communications Division staff and is generally used for informal CASF matters (e.g. draft resolutions, notice of applications/project summaries.) The CASF Distribution List is available at <http://www.cpuc.ca.gov/General.aspx?id=8246>.

A public housing agency applying for BPHA funds must include in its submission the Annual HUD Contributions Contract and HA Code, allowing staff to verify its certification along with its most recent HUD Public Housing Assessment System (PHAS) score.

Non-profit applicants must submit an IRS letter approving the applicant's status as a 501(c)(3) entity incorporated for the purposes of providing affordable housing, which must include the applicant's Tax Identification Number, along with an award letter from a public agency such as the California Tax Credit Allocation Committee (TCAC), proving its receipt of public funding for affordable housing purposes.

For PSCs applying for infrastructure funds, the Commission shall award grants only to housing developments that are unserved as defined in Section III.

Applications must contain the following information.

1. Funds Requested

The applicant must indicate the amount of funding requested.

2. Project Location

The applicant must include a physical address for each project location along with an image of the location on the map. The Commission will accept a screenshot image from online maps or similar images.

3. Key Contact Information

- First name
- Last name
- Physical mailing address
- Email ID
- Phone number(s)

4. Key PSC Management

- Position title
- First name
- Last name
- Email ID
- Phone number(s)

5. Key Vendor Contact Information (if the applicant already has identified its vendor)

- First name

- Last name
- Company name
- Physical mailing address
- Email ID
- Phone number(s)

6. Assertion of Unserved

The applicant must attest to whether or not the housing development that will be connected through the proposed project is unserved, as defined in Section III. The applicant also must verify that it has not denied an ISP access to its property in order to provide broadband service to any unit. An applicant's previous denial of access for cause (e.g., the ISP's service cost to the resident or the applicant were unreasonably high) does not constitute a denial of a right of access.

7. Proposed Project Description

An applicant must provide a detailed description of the broadband project that will be funded under the CASF BPHA program, including but not limited to the elements listed below.

Detailed broadband project plan proposal that includes:

- The type of technology that will be used on the project with all technical specifications, network topology, schematic diagram, engineering, and design documentation.
- Project plan showing the number of residential units in the PSC to be connected.
- Entities that will provide broadband Internet service on the project site (E.g., The type of Internet service and the bandwidth offered by a named ISP)
- Download and upload data rate/speed capabilities for an average user within the property at a given time of peak and off-peak hours must meet at least 6 Mbps downstream and 1 Mbps upstream.
- Project budget outlining all the budget costs, both actual line items and the matching funds.

Actual budget cost line items funded by the grant that includes:

- The cost for all eligible equipment as listed in Section II.
- The cost for low voltage contracting work as described in Section II.
- Broadband network engineering and designing cost with required supporting documentation.

- The cost of any required hardware warranty of broadband network equipment.
- The cost of installation, provisioning, and configuration labor as described in Section II.
- Any applicable taxes, shipping, and insurance costs that are directly related to broadband network equipment deployed under the BPHA.

Matching funds to be provided by the applicant that includes:

- Monthly recurring Internet bandwidth cost for the five-year project period, post-project completion.
- Operations and Maintenance (O&M) cost to ensure the network and broadband services are operational for at least five years post completion of the project.

Project milestones with a delineated deployment schedule that includes:

- A commitment timeline to complete the project within 12 months of Commission approval of the application.
- The schedule identifying major prerequisites such as a detailed project plan with a timeline including low voltage construction, network installation, provisioning and configuration, testing, submission of closeout package with project completion report, and any other milestones that can be verified by the Commission staff.
- While developing the schedule, the applicant must include the timeline required for California Environmental Quality Act (CEQA) or other relevant government agency permit review, if needed.

8. Organizational Chart and Background

The applicant must submit an organizational chart showing the parent organization, subsidiaries, and affiliates.

9. Economic Useful Life of Assets to be Funded

The applicant must identify the expected economic useful life of the assets funded by the BPHA grant.

10. Proposed Billing

An applicant must commit to charging residents no more than \$20 per month per residential unit for broadband Internet service.

11. Financials

Applicants must submit the most recently prepared annual reports and audits that it submitted to the HUD, in the case of chartered public

housing authorities, or another government entity, in the case of non-profits submitted to the HUD, California Tax Credit Allocation Committee, etc.

12. Permitting Compliance

The applicant should state whether the project is statutorily or categorically exempt from CEQA requirements and cite the relevant authority, as applicable. If a project does require review under CEQA, the grantee must provide the Proponent's Environmental Assessment (PEA) prior to the first 25 percent payment. The PEA submission should include information on any land crossing sites requiring discretionary or mandatory permits or environmental review pursuant to CEQA (include the type of permit required, the name of the permitting agency/agencies and the Lead Agency if an environmental review is required). Additionally, applicants must include any applicable permit review timeline in its construction schedule, with a reference to the government agencies that will issue the permits. Grantees must provide staff with proof of permit approvals before seeking reimbursement.

13. Affidavit

An applicant 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 (Attachment A). Additionally, an applicant must also agree to abide by the CASF program rules established by the Commission, Commission's Rules of Practice and Procedure and statutes, be subject to Public Utilities Code sections 2108 and 2111 and to submit quarterly reports and annual recertification or audit documents.

B. BPHA PSC Adoption Project Application

To date, the \$5 million allocated for grants for PSCs has been fully committed. Therefore, the Commission can no longer accept applications for these projects unless the statutory cap is raised. However, eligible PSCs can apply for funds for broadband adoption projects from the Broadband Adoption Account.

VI. Submission and Timelines

Applicants must electronically file their completed applications using the Commission's FTP file server (<https://kwftp.cpuc.ca.gov>) and mail hard copies to:

1. California Public Utilities Commission
Communications Division
Attn: California Advanced Services Fund, Housing Coordinator
2. California Public Utilities Commission
Office of Ratepayers Advocates
Re: California Advanced Services Fund

Since applications are not filed with the Commission's Docket Office, they will not be assigned proceeding number(s).

Applications may be submitted at any time until all funds available for BPHA infrastructure projects have been awarded. However, staff will consider applications submitted on or before each deadline listed below as a batch.

Staff shall notify an applicant by a letter specifying reasons for rejection should an application fails to meet the BPHA eligibility criteria.

Deadlines:

- July 1, 2020
- October 1, 2020

Any deadline falling on a holiday or a weekend will be extended to the following business day. Staff will notify the CASF Distribution List when all funds available for BPHA infrastructure projects have been awarded, and an eligible PSC may submit an application for funding from the Infrastructure account using the same criteria set forth here.

Additionally, after each deadline, staff will post all applications on its website to give ISPs three weeks from the date of posting to challenge the application (See Section VIII).

VII. Expedited Review

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

Infrastructure Projects

- Applicant meets the eligibility requirements under Pub. Util. Code, § 281(i)(1), § 281(i)(2) and (i)(3).
- Applicant attests that the housing development is “unserved” as defined in Section III, which is a housing development where at least one housing unit within the housing development is not offered broadband Internet service.¹⁰
- Applicant declares that it has not denied an ISP access to its property to provide broadband Internet service and no ISP challenged this statement.
- The application is not challenged.
- Applicant requests a grant of less than \$75,000 in BPHA infrastructure grant funds per project.
- For projects connecting 50 PSC units or less, the proposed project costs \$600 per unit or less.
- For projects connecting 51-100 PSC units, the proposed project costs \$450 per unit or less.
- For projects connecting 101 PSC units or more, the proposed project costs \$300 per unit or less.
- The buildings included in the application meet standards for acceptable basic living conditions as determined under HUD’s Uniform Physical Condition Standards or similar guidelines provided by other housing funding agencies in the State.
- Applicant must attest that it expects the property to be in residential use as public housing for at least the next 10 years.
- The property qualifies for an exemption pursuant to CEQA Guidelines.
- For wireless networking projects, the equipment must meet at least 802.11n standard.
- For wireline networking projects, the equipment must meet at least ADSL2+ or 10BASE-X standard.
- Applicant attests it will operate and maintain project equipment, broadband technology, and internet services for at least five years after successful completion of the project and that it has sufficient funds to do so. In addition, the Applicant attests that it will acquire the necessary hardware warranty and service agreement to support the operation of the proposed network for the five-year period.
- The proposed project network is capable of providing broadband internet service speeds of at least 6 Mbps downstream and 1 Mbps upstream (supported by submitted documentation).
- Applicant will charge residents no more than \$20 per month per residential unit for broadband internet services.

¹⁰ Pub. Util. Code, § 281(i)(3)(B)(i) and (B)(ii).

- Applicant has signed an affidavit agreeing that the statements and representations made in the application are true and correct, to abide by the CASF program rules established by the Commission, Commission rules of practice and procedure and statutes, and Pub. Util. Codes, §§ 2111 and 2108.
- Applicant agrees to complete the project within 12 months from the date of the Commission approval.
- Applicant has an identified ISP source and its required internet bandwidth capacity at the MPOE (Minimum Point of Entry).
- Applicant agrees to secure project funded hardware to prevent theft and vandalism.

Applications not meeting the above expedited review criteria may only be approved by the Commission via Resolution. All applications shall be approved, denied, or marked for further review by the Commission through a Resolution.

VIII. Challenge Process

ISPs have three weeks from the date of posting the application to the BPHA website to challenge an application. An ISP who challenges an application on the grounds that it already provides broadband internet service to 100 percent of the residents at the property or it was denied a right of access in question must submit documentation evidence no later than three weeks from posting of the application. To the extent that any information submitted is claimed to be confidential, the submitter must provide a public redacted version, in addition to the confidential version, and comply with the confidentiality requirements in G.O. 66-D including providing the requisite confidentiality declaration to the Communication Division (CD). The challenger must also provide public notice of the challenge to the CASF Distribution list.

The ISP must provide the following information to justify their challenge:

For 100 percent residents already served

- The number of customers living on the property that subscribed to its service, billing documents and speed tests to prove that it provides broadband Internet service at speeds of at least 6 Mbps downstream and 1 Mbps upstream to each residential unit.
- A backhaul capacity test report(s)¹¹ proving that it has an adequate capacity to serve all the residents with broadband internet service with a

¹¹ Reports showing capacity test results of backhaul network (SONET/SDH, T1, T3, OC3, OC12, IP and Ethernet backhaul over Fiber, Microwave, and Satellite) to ensure that the ISP transmission network is capable of serving a reliable and committed data rate/internet speed in the served area to a growing number of residential units.

minimum speed of 6 Mbps downstream and 1 Mbps of upstream to all residential units.

For denial of right of access

- Written documentation showing who made the denial, the date of the denial, and the reason for the denial. i.e, Letters, e-mails or other written documentation.

CD will investigate all submitted challenges. Incomplete challenges or challenges submitted after the deadline will be deemed denied. CD will inform the applicant of the challenges submitted on its application and provide the challenger's name and information submitted. Applicants may rebut the challenge by providing sufficient documentation showing that services are not available to 100 percent of the residents. CD will base its decision on the material submitted. If it is found that the ISP who is challenging the application cannot prove it can serve 100 percent of the residents, then the challenge will be rejected, and the application may be considered by resolution. If it is found that the ISP can serve 100 percent of the residents, then the application will be denied. CD will inform the applicant and the challenger of the outcome of its decision.

IX. Project Status and Reporting

Infrastructure project grantees are required to submit a project status report within six months of the project award date if the project has not been completed, irrespective of whether the grantee requests reimbursement or payment. The project status report must include the following:

- Project Plan and deployment schedule showing major milestones with planned and actual completion dates.
- Any variance between planned and actual dates need to support with proper reasoning.
- Project Risk Mitigation plan.¹²
- Budget Plan with a cost line item matched with the application.

Grantees must certify that each project status report submitted is true and correct under penalty of perjury.

Infrastructure project grantees must submit a project completion report with all required supporting documentation in order to receive final payment. The project completion report contains, total project cost, project cost summary

¹² Plan that identifies, evaluates, selects, and implements options in order to balance the BPHA project cost and schedule implications associated with risk response or mitigation plan by setting risk at acceptable levels given program constraints and objectives.

breakdown, project milestone deployment details, CalSPEED¹³ test results, bill of materials (BOM), invoices supporting BOM, network and low-voltage engineering and design documentation, installation and commissioning checklist, provisioning and configuration files, as-built documentation with pictures showing labels and annotations, and project expenses summary. The project completion report template can be found on the BPHA website.

Infrastructure project grantees are required to maintain the broadband network for a period of five years after the network is installed and internet services turned on for residential use. From the date broadband network and internet services are turned on the grantees are required to submit a KPI (Key Performance Indicator) report¹⁴ every quarter for a period of five years. The KPI report and its supporting system data can be submitted through an online portal that can be found on the Commission website under the CASF BPHA hyperlink.

The KPI report includes the following:

1. Monthly Percentage Uptime of network and internet services
2. Monthly Bandwidth Utilization by the residents (the amount of internet data transferred or the usage in gigabytes on the network)
3. Monthly Number of Unique User Devices Logged-in by the residents to access the broadband network for internet services

To support the above KPI report information, the grantee must submit the system data obtained from the network.

¹³ CalSPEED is an open source, non-proprietary, network performance measurement tool and methodology created for the Commission, funded originally via a grant from the National Telecommunications and Information Administration

¹⁴ KPI report is to measure the broadband network service performance and to keep proper checks and balances on the BPHA program goals and objectives.

X. Sale or Transfer of Assets

Infrastructure project grantees must notify the Commission about any proposed sale or transfer of ownership of the project property that occurs prior to the completion of the five-year requirement. The grantee must require the new owner to assume grant obligations of operating and maintaining the broadband internet services for the remaining period of the five years term. The grantee shall notify the Director of the Communication's Division in writing of its intent to sell or transfer its assets within five days of becoming aware of these plans. The grantee shall also provide documentation, including an affidavit, stating that the new entity or owner will take full responsibility and ownership to comply with the terms of the CASF grant award. The new entity shall agree in writing to such.

XI. Payment Terms

Infrastructure project grantees are eligible to request the payment for the expenditures incurred during the first six months if the grantee submits a six-month project status report and certifies that the status report is true and correct under penalty of perjury.

Grantees shall submit final requests for payment no later than 90 days after completion of the project. If the grantee cannot complete the project within the 12-month timeline, the grantee must notify the Commission or Director of Communications Division as soon as they become aware that they may not meet the project timeline. In the event the grantee fails to notify the Commission or Director of Communications Division, the Commission may withhold or reduce payment.

Grantees must submit the project status and completion reports with all required supporting documentation for the staff to review in order to receive payment.

Payments are based on submitted receipts, invoices and other supporting documentation showing expenditures incurred and work done on the project in accordance with the approved CASF funding budget included in the grantee's application.

Payment in full can be made for the entire project upon review of the submitted project completion report and supporting documentation and after staff approvals.

The payments will be made in accordance with, and within the time specified in California Government Code § 927 et seq.

Grantees are required to maintain records such as files, invoices, and other related documentation for three years after final payment. Grantee shall make these records and invoices available to the Commission upon request and agrees that these records are subject to a financial audit by the Commission at any time within three years after the final payment made to the Grantee.

The Commission has the right to conduct any necessary audit, quality check, verification, and discovery during project implementation and post-project completion to ensure that CASF funds are spent in accordance with the terms of approval granted by the Commission. Invoices submitted will be subject to financial audit by the Commission at any time within 5 years of the release of the final payment.

If any portion of reimbursement is found to be out of compliance, grantees will be responsible for refunding any disallowed amount along with appropriate interest rates determined in accordance with applicable Commission decisions.

XII. Execution and Performance

The infrastructure project grantee shall start the project within 30 days upon grant approval and complete the project execution within a 12-month timeframe. Should the grantee or Contractor fail to commence work within 30 days of grant approval, the Commission or Director of Communications Division, upon five (5) days written notice to the CASF recipient, reserves the right to terminate the award. If the grantee is unable to complete the proposed project within the required 12-month timeframe, it must notify the Commission as soon as it becomes aware of this prospect. The Commission reserves the right to reduce or withhold payment failure to satisfy this requirement. Grantees must operate and maintain the network for a minimum of five years after it has been installed.

The grantee must complete all the performance on the project before the termination date in accordance with the terms of approval granted by the Commission. In the event that the grantee fails to complete the project or subsequently operate and maintain the network service in accordance with the terms of approval granted by the Commission and compliance with CASF program guidelines, the grantee must reimburse some or all of the CASF BPHA funds that it has received.

Material changes in the entries for this application, such as discontinuing operation or bankruptcy, or change of name (DBA¹⁵), change of address, telephone, fax number or email address must be reported immediately by a letter to the CPUC, Director of the Communications Division, 505 Van Ness Avenue, San Francisco, CA 94102.

XIII. Consent form or Compliance Changes Pursuant to CASF Performance Audit

All grantees are required to sign a consent form agreeing to the terms stated in the resolution or award letter authorizing the CASF award. The agreement will provide the name of the grantee, names of officers, and must be signed by the grantee. The proposed wording of the consent form is in Attachment B to this document.

XIV. Penalties

Grantees must agree to the following language in the affidavit found in Attachment A to this Decision.

If [Grantee Name] violates the terms and conditions of a CASF award or other program and project compliance requirements, it shall be subject to Public Utilities Code sections 2108 and 2111. The Commission may impose the maximum penalties allowed under Public Utilities Code sections 2108 and 2111 for failure to meet the program and project compliance requirements, as determined by the Commission.

Submit completed applications online at <https://kwftp.cpuc.ca.gov> with hard copies mailed separately to:

Communications Division
Attn: California Advanced Services Fund
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Office of Ratepayer Advocates
Re: California Advanced Services Fund
California Public Utilities Commission

¹⁵ A DBA "Do Business As" is also known as a "fictitious business name," "trade name," or "assumed name."

R.12-10-012 COM/MGA/kz1

505 Van Ness Ave.
San Francisco, CA 94102

ATTACHMENT A

ATTACHMENT A
NOTARIZED AFFIDAVIT

Name of Publicly Supported Community
(PSC) _____

My name is _____. I am _____ [Title] of
_____ [PSC]. My personal knowledge of the facts stated herein
has been derived from my employment with _____
[Company]

I swear or affirm that I have personal knowledge of the facts stated in this Application for the California Advanced Services Fund (CASF), I am competent to testify to them, and I have the authority to make this Application on behalf of and to bind the Company.

I further swear or affirm that _____ [Name of PSC] agrees to comply with all federal and state statutes, rules, and regulations, covering broadband services and state contractual rules and regulations, if granted funding from the California Advanced Services Fund.

I swear or affirm that I agree to comply with Rules 1.11 and 2.2 of the California Public Utilities Commission's Rules of Practice and Procedure and CASF program requirements.

I swear or affirm that by receiving a CASF grant, [Grantee Name] agrees to comply with the terms, conditions, and requirements of the grant and thus submits to the jurisdiction of the Commission with respect to the disbursement and administration of the grant. I swear or affirm, under penalty of perjury, and under Rule 1.1 of the California Public Utilities Commission's Rules of Practice and Procedure, that, to the best of my knowledge, all of the statements and representations made in this Application are true and correct.

If _____ [Grantee Name] violates the terms and conditions of a CASF award or other program and project compliance requirements, it shall be subject to Public Utilities Code sections 2108 and 2111. The Commission may impose the maximum penalties allowed under Public Utilities Code sections 2108 and 2111 for failure to meet the program and project compliance requirements, as determined by the Commission.

Adoption project applicants **only**: I attest that the _____ [PSC] is wired and broadband Internet service is available to all PSC units on the property.

Signature and title

Type or print name and title

SUBSCRIBED AND SWORN to before me on the ____ day of ____, 20____.

Notary Public In and For the State of _____

My Commission expires _____

(END OF ATTACHMENT A)

ATTACHMENT B

**ATTACHMENT B
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.

The 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-_____ or Approval Letter.

Dated this ____ day of _____, 20____.

Signature:

Printed Name: _____

Title: _____

Name of Organization or Company: _____

Business Address (street address, suite or apt number, city, state and zip code)

Telephone Number (include area code): _____

Email Address: _____

(END OF ATTACHMENT B)