

Your Town Online, Inc

June 7, 2020

Robert Osborn Director, Communications Division

California Public Utilities Commission

505 Van Ness Avenue, Third Floor

San Francisco, CA 94102-329

Re: Frontier CASF Broadband Infrastructure Grant Application – Piercy/Leggett/Laytonville

Dear Director,

I am respectfully submitting the following opposition comments regarding the above titled CASF application on behalf of Your Town Online Inc, Rural Broadband Now! LLC, and WillitsOnline.

1. Frontier is in bankruptcy status.

The existing bankruptcy status should preclude Frontier from eligibility to apply for CASF funding. Frontier already provides extremely poor service to it's wireline operation and fails to maintain any reasonable service standard, and it's difficult to imagine how the added financial and technical stress from significant scope new projects such as this proposal would do anything other than stretch its resources even more and result in further outages and poor service and lack of maintenance elsewhere.

2. Frontier has admitted to previously failing to meet deployment milestones for CAF funded broadband service.

See:<https://arstechnica.com/tech-policy/2020/01/centurylink-frontier-took-fcc-cash-failed-to-deploy-all-required-broadband/>

and specifically, this fcc filing:

<https://ecfsapi.fcc.gov/file/10115075584633/FTR%20YE%202019%20CAF%20Letter%201.15.20.pdf>

It stands to reason that the same factors which contributed to these past failures, and resulted in it's bankruptcy, are not resolved and will likely persist until Frontier gets it's own house in order. It would be inequitable for Frontier to proceed with it's existing track record and status, putting the success and long term operation of the completed project at demonstrable risk.

3. The proposed services to 13 community anchor institutions include ineligible entities, and entities already receiving fiber based service from ATT.

a) Cahto Peak COM – appears to be a cellular communications site, a huge cash cow for providers, but only if you can get someone else to pay for the several miles of 'rugged mountain terrain' fiber to bring the connectivity all the way out to it. The cost of getting from the Laytonville central office proposed (LYVLCAXF) up to this location, by itself, is very likely to exceed \$1mm, and

the facilities constructed along the way will not provide the stated benefits of fttp and 1gbps speeds to anyone other than the cellular companies.

b) Iron Peak COM – The same as above, a cellular communications site in back country rugged mountain terrain conditions, also likely costing in excess of \$1mm to construct, and only benefiting cellular carriers.

c) Some of the other listed community anchor institutions already have access to or are being provided already with fiber based service by ATT. Specifically, we are certain that at least Laytonville High is receiving ATT ASE (upgraded from OptiMan) service which will scale to 10gbps, and possibly some others in that same area of Laytonville. With respect to the assertion to serve Spy Rock school with fiber, the fact also is that there already exists fiber on that path owned by ATT and serving the cellular communications site there, and it would likely be available to Spy Rock school. As in the prior cases, the only legitimate purpose for this segment of the Frontier proposal would again be to run fiber to the cell site for the benefit of the cell carriers at a tremendous cost for no justifiable public purpose. Furthermore, we would submit that the portion of Laytonville that includes the high school, has been removed from RDOF eligibility again, because of existing ATT service.

4. Existing service meeting / exceeding minimum broadband thresholds in portions of the target area

Newly submitted coverage data has been provided under separate cover to substantiate existing services provided by WillitsOnline which demonstrates large scale deployment of wireless and xdsl services within and around the Laytonville area, some of which was also partially funded by a prior CASF award.

5. The proposed %100 funding is not justified due to the existing service by other providers, including WillitsOnline.

All other factors aside, the proposal does not include ‘dial up only’ areas as the coverage data will verify, and thus would not be eligible for the additional %40 funding if otherwise granted.

For any further questions regarding this challenge, please reply via email to:

casf@YourTownOnline.Com

Thank you.

Mike Ireton
President
Your Town Online, Inc
Rural Broadband Now! LLC

DBA WillitsOnline
DBA Pacific Internet