

**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

**COMMENTS OF CALIFORNIA STATE UNIVERSITY, MONTEREY BAY ON  
RULEMAKING 12-10-012 FOR OIR TO  
CONSIDER MODIFICATIONS TO THE CASE**

Arlene Krebs  
Director, Wireless Education & Technology Center  
CSU Monterey Bay  
100 Campus Center, Bldg. 18  
Seaside, CA 93955  
831-582-5025  
831-582-4701  
[akrebs@csumb.edu](mailto:akrebs@csumb.edu)

November 30, 2012

California State University, Monterey Bay hereby submits its Comments in response to the **Order Instituting Rulemaking 12-10-012 to Consider Modifications to the California Advanced Services Fund.**

These comments support the elimination of the requirements for Certificate of Public Convenience and Necessity (CPCN) and Wireless Identification Registration (WIR) of the California Advanced Services Fund (CASF).

California State University, Monterey Bay has served as the host organization for the Central Coast Broadband Consortium for over 5 years, and has convened since 2003 numerous forums and conferences related to broadband infrastructure and applications. California State University, Monterey Bay has also maintained the minutes of meetings of the Central Coast Broadband Consortium, as well as comments from local agencies and people in the public and private sectors who have expressed support for a comprehensive strategy for broadband infrastructure particularly in the unserved and underserved areas of our tri-county region (Monterey, San Benito and Santa Cruz counties).

The eligibility modification as now proposed has the potential to increase the pool of applicants and to encourage flexible approaches to consolidated and coordinated broadband projects within a region. We agree with the CASF staff, that requirements should be changed so that funding can be provided to non-CPCN/WIR candidates who may be the most logical applicants to achieve the most cost-effective and efficient deployment of broadband infrastructure in a region.

Proposals should be encouraged from providers and organizations such as:

- Wireless Internet service providers (WISPs, mobile or fixed) who may best serve the difficult terrain and population distribution in California;
- Providers using predominately unlicensed spectrum used for Wi-Fi capability;
- Providers that build fiber optic based middle mile facilities;
- Providers of satellite communications which provide last-mile infrastructure to reach households, businesses, and agencies particularly those located in geographically challenging and difficult to reach areas;
- Providers who use unlicensed microwave to provide middle mile facilities more efficiently;
- Any non-profit entity, including government entities or community anchor institutions; and
- Tribal entities.

Without this flexibility, there may be significant impacts on reaching the goal of 98% broadband deployment and 80% adoption for California by 2015 – goals acknowledged by the California Broadband Council (CBC), California Public Utilities Commission (CPUC), and California Emerging Technology Fund (CETF).

There is precedence for removal of the CPCN/WIR requirement. The CPUC permitted non-CPCN/WIR CASF applicants as a matching component to American Recovery and Reinvestment Act (ARRA) broadband infrastructure awards in 2009.

The CPUC should ensure that the CASF, which is the primary resource that supports and subsidizes broadband infrastructure deployment funds, use these funds in the most cost-effective and efficient manner to achieve the goal of providing broadband access to 98% of all residences in California. The removal of the CPCN/WIR requirement will help facilitate critical broadband innovation and investment in the remaining unserved and underserved regions in California. Ubiquitous broadband infrastructure is and will continue to be critical to stimulate economic development and improve public safety, education, healthcare, government, community services and more.

Thank you in advance for your consideration of our comments.

Dated November 30, 2012

Respectfully submitted,

/S/ NAME (*electronic signature is ok*)

  
Arlene Krebs

Arlene Krebs  
Director, Wireless Education & Technology Center  
California State University, Monterey Bay  
100 Campus Center, Bldg. 18  
Seaside, CA 93955  
831-582-5025  
831-582-4701  
[akrebs@csumb.edu](mailto:akrebs@csumb.edu)