

October 15, 2013

CALIFORNIA ADVANCED SERVICES FUND

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Dear California Public Utilities Commission:

As stated in our January 23rd 2013 support letter, the Eastern Sierra Connect Regional Broadband Consortium is supporting the Infrastructure Grant application submitted by Race Telecommunications in February 2013 for the community of Boron.

ESCRBC has worked hard to clearly describe the Broadband service needs of our rural communities. The fiber-to-the-premise infrastructure projects proposed by Race Communications are in-line with our desires, meet the current and the future needs of residents and local businesses, and help close the Digital Divide in California.

Verizon of California recently submitted a comment letter (October 9, 2013) recommending that Resolution T-17416 be reviewed and amended. While we recognize and acknowledge this was not a formal challenge of the Race Telecommunications, Inc. application, and that the Verizon letter was not compliant with the format of a formal comment letter, we feel compelled to express our support to Race Communications application since the letter recommends denial of their application.

We would like to insist on some facts about the Boron community and Boron project:

- There is no widespread availability of fixed broadband in the Boron area resulting in speeds in excess of 6 mbps down and 1.5 mbps up. Only mobile broadband is available.
- It is very unlikely that Verizon is able to provide coverage in the entire area based on the technology they are using. Verizon wireless coverage and performance claims predict substantial coverage where there actually may not be due to “black out” areas or for reasons of penetration loss (see report by Jim Warner from University of California, Santa Cruz¹). Race Telecommunications did a great job at identifying the many “black out” areas in Boron.
- Pricing is a valid criterion to consider for any Broadband deployment. Broadband needs to be affordable to residents, especially in Boron. Boron per capita income for the CDP was \$18,294 (below the California state average). About 15.2% of families and 19.7% of the population were below the poverty line, including 32.8% of those under age 18 and 19.4% of those age 65 or over². According to our survey, 35% of Eastern Sierra residents not

¹ <http://people.ucsc.edu/~warner/in-bldg/Penetration-Loss.pdf>

² http://en.wikipedia.org/wiki/Boron,_California

connected stated the reason for not being connected is because Broadband is too expensive.³

Eastern Sierra Connect Regional Broadband Consortium identified Boron as one of the top priority community to connect to reach the state objective of connection 98% of Californian connected by December 2015⁴. The residents are truly underserved and are complaining of the lack of coverage. We are available if you need more information.

In conclusion, ESCRBC fully supports the projects of Race Communication as they seek CASF funding to support deploying Broadband in the underserved areas of the Eastern Sierra.

Sincerely,



Nate Greenberg
Chair ESCRBC

³ <http://escrbconsortium.org/survey/>

⁴ See SB 740 Senate Bill