



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking Into
the Review of the California
High Cost Fund-A Program

R. 11-11-007

**RESPONSE OF CALIFORNIA CABLE & TELECOMMUNICATIONS
ASSOCIATION TO MOTION OF INDEPENDENT SMALL LECS FOR ONE-
YEAR EXTENSION OF GENERAL RATE CASE FILING DEADLINES,
FREEZE OF CALIFORNIA HIGH COST FUND-A WATERFALL AND
RESEQUENCING OF CERTAIN RATE CASES**

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Pursuant to Section 11.1(e) of the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC” or “Commission”), the California Cable and Telecommunications Association (“CCTA”)¹ hereby submits this response to the motion of the Independent Small Local Exchange Carriers (“Small LECs”) requesting a one-year extension of deadlines for general rate cases and related filings.

CCTA does not address the merits of the Small LECs’ rationale for the requested extension but is concerned with how grant of this motion may lead to further delay in resolution of critical policy issues that remain pending in this proceeding that is now nearly 10 years old. Specifically, CCTA is concerned that grant of this motion may indirectly lead to further delay in lifting the ban on competitive local exchange carrier (“CLEC”) operations in the service territories of Small LECs.

The Small LECs’ motion references outstanding issues in Phase 2 of this proceeding that inform its general rates cases but bear no relationship to the competition ban issue referenced above. If this motion is granted, it would be an implicit acknowledgment that

¹ CCTA is a trade association consisting of cable providers that have collectively invested more than \$40 billion in California’s broadband infrastructure since 1996 with systems that pass approximately 96% of California’s homes.

Small LECs need more time to file their general rate cases, presumably because the Phase 2 issues underlying those general rate cases require further deliberation in this docket. In that case, it would be wholly unfair and unnecessary for the competition ban issue to be caught up in, and delayed with, these other wholly unrelated Phase 2 issues.

Previous rulings appear to indicate some intent to address the competition ban issue separately. For example, the Administrative Law Judge's Ruling issued November 8, 2019, asked for comment on issues specific to allowing wireline competition in Small LEC service areas.² As stated in multiple previous filings, CCTA requests that the CPUC expeditiously issue a Proposed Decision to lift this ban so that CLECs can provide telecommunications service in rural California markets where the Small LECs, wireless carriers and over-the-top voice providers already provide service.

Thus, CCTA urges the CPUC, when considering the Small LECs' motion, to avoid any action that could lead to further delay in addressing the stand-alone issue of lifting the ban on CLEC operations and ensuring that residents of rural California can soon realize the benefits of more competition in the provision of alternative, innovative communications services.

Respectfully submitted,

/s/ Jacqueline R. Kinney

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² *Administrative Law Judges' Ruling Seeking Comment on General Guidelines for Allowing Wireline Competition in Areas Served by Small Local Exchange Carriers* (November 8, 2019).