



# Central Coast Broadband Consortium

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20054

June 4, 2018

Re: *Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. 160(c) to Accelerate Investment in Broadband and Next-Generation Networks*, WC Docket No. 18-141

Dear Ms. Dortch,

The Central Coast Broadband Consortium (CCBC) is the California Public Utilities Commission (CPUC)-designated and funded Regional Broadband Consortium representing Monterey, San Benito and Santa Cruz counties in California. Our role is to advance the interests of a diverse range of telecommunications stakeholders in our three counties, with the goal of ensuring that adequate service is available to all.

The CCBC supports the motions for extension of time filed by the CPUC<sup>1</sup> and others, and thanks the Commission for the 60 and 15 day extensions granted.

Specifically, the CPUC requires sufficient time to compile data from the Salinas and Santa Cruz-Watsonville Metropolitan Statistical Areas, as well as the other 24 MSAs in California.

The CPUC also joins INCOMPAS's Motion to Dismiss<sup>2</sup> to a limited extent. The CCBC likewise supports INCOMPAS's Motion to Dismiss. In its petition, USTelecom proposes a radical overhaul of telephone industry regulation. Extraordinary conclusions require extraordinary evidence. USTelecom's petition<sup>3</sup> is a mundane recitation of self-interested opinion backed by the barest summary of cherry picked data. Full disclosure of all underlying data is essential for proper consideration of its request.

Sincerely,

Joel Staker  
Chair  
Central Coast Broadband Consortium

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<sup>1</sup> Motion for Extension of Time of the California Public Utilities Commission, WC Docket No. 18-141 (May 18, 2018).

<sup>2</sup> Motion to Dismiss of INCOMPAS, WC Docket No. 18-141 (May 11, 2018).

<sup>3</sup> Petition of USTelecom for Forbearance Pursuant to 48 U.S.C. § 160(c) to Accelerate Investment in Broadband and Next-Generation Networks, WC Docket No. 18-141 (May 4, 2018).