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[Due date 17 March 2017]

High Impact Areas for Broadband Availability  
Staff White Paper Comments  
Sellden, You-Young (Clover)

Dear Ms. Clover Sellden,

On behalf of Sierra Business Council (SBC), the new administrator for the Gold Country Broadband Consortium, and a non-profit network of 4,000 business, local government and community partners working to foster vibrant, livable communities in the Sierra, we respectfully submit the following comments on the High Impact Areas for Broadband Availability - Staff White Paper.

We appreciate the desire of the Communications Division staff to identify the areas that represent the best bang for the buck for the limited remaining CASF funds though would like to make sure the California Legislature's intent to continue a universal service commitment by assuring the continued affordability and widespread availability of high-quality telecommunications services to all Californians in Public Utilities Code section 709 is also recognized. We strongly believe that in order to meet this universal service commitment, funding will need to be directed to the hardest to serve parts of the State since ISPs will continue to avoid investment in these areas without support from the CPUC. We understand this will require additional funding allocated by the Legislature though hope CD staff recognize the significant needs of rural areas that do not meet the quantitative and qualitative criteria that CD staff used to identify the high impact areas .

In regards to the quantitative and qualitative criteria used to identify the high impact areas , we respectfully request that CD staff provide additional rationale and analyze alternatives to the criteria selected, specifically the household density and difficult terrain criteria. We appreciate CD staff recognizing the limitations in the analysis, specifically that service to one household in a census block does not mean service to all households and that the database uses the highest available speeds not average speeds. We also request that CD staff recognize that the speeds reported by ISPs are not often realized by households. We are working to validate the speeds reported by ISPs and identify households that are currently unserved through an improved outreach campaign and hope to be able to provide the CPUC with better data in the future.

Thank you for the opportunity to submit comments on the High Impact Areas for Broadband Availability Staff White Paper. We look forward to working with CD staff to help identify areas where the limited CASF funds can have the greatest impact and develop strategies to ensure service for all Californians.

Best Regards,

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