

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

Order Instituting Rulemaking to Consider
Modifications to the California Advanced Services
Fund

|
| R.12-10-012
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**REPLY COMMENTS OF ACCESS HUMBOLDT (AH)
ON THE ORDER INSTITUTING RULEMAKING**

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December 18, 2012

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**LOCAL AND PUBLIC OWNERSHIP OF BROADBAND NETWORKS ARE THE
MOST APPROPRIATE MODELS TO RECEIVE SUPPORT FROM THE STATE
AND MORE LIKELY TO MEET THE UNIVERSAL SERVICE GOALS OF
STATE POLICY**

AH supports State policies and CPUC rules that would encourage and facilitate deployment of broadband network services by municipalities, local community-based non-profits, American Indian Tribes, public-private partnerships, and other local entities.

Private telephone corporations and other telecommunications utilities are hindered in delivering public benefits by their goal of maximizing profit to absentee owners – requiring them to charge higher prices for services of lower quality with less customer service. Because management decisions are removed from the local community context, there is little transparency and less accountability in absentee owned networks as compared to locally owned and community-based networks.

Networks owned and operated by local public agencies and community-based organizations provides the most transparency and direct accountability to the communities they serve. By directing CASF support to broadband networks with ownership and management based in the communities that those networks serve – the CPUC can most effectively ensure that those networks are meeting the local needs and interests of funded communities and not being diverted to create profit far away.

Community-based and locally owned entities are more likely to provide open internet and other broadband transport services that are more accountable to the communities they serve with faster, more effective customer service, especially for the least served people and places that are the focus of the CASF funds.

Dated: December 18, 2012

Respectfully submitted:

_____/s/_____
Sean McLaughlin
Executive Director
Access Humboldt