

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
CALIFORNIA

Resolution No. T-17443 Implements
new timelines for applicants to the
California Advanced Services Fund;
(CASF); how local government and
non-telephone corporations may apply
under Senate Bill 740 and how
existing providers may exercise right
of first refusal as provided in SB 740.
The Resolution lists areas in
California that various CASF-funded
regional consortia groups and state
agencies have identified as priorities
for broadband infrastructure
deployment. Broadband providers are
encouraged to target these areas in
their applications for CASF funding
so as to have funded projects that will
provide broadband access to no less
than 98% of California households by
no later than December 31, 2015.

Draft Res. T-17443
(Served May 27, 2014)

**COMMENTS OF THOMAS W. WEST ON
DRAFT RESOLUTION T-17443**

June 10, 2014

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SUMMARY OF RECOMMENDED CHANGES

As part of developing Draft Resolution T-17443, the Communications Division (CD) asked currently existing regional consortia to determine priority areas for broadband projects in each of their regions for the purposes of SB 740. These regional consortia, as well as four unrepresented counties, designated 180* communities in 46 different counties as priority areas in their regions. As displayed in Appendix 4, Column 5, each of 177* priority communities was designated as either unserved or underserved by the consortia and counties.

CD staff performed a high-level validation of the consortia's submitted data by comparing the coordinates for each priority area with the California Broadband Availability Map. As depicted in Appendix 4, Column 6, 110 of these 177 projects areas are considered served areas, based on the broadband providers reported data to the CPUC.

The magnitude of these designation differences is not stated as a major finding in the Resolution. Nor, is there a recommended course of action to reconcile these differences.

It is recommended the Resolution include a new finding that cites the fact that regional consortia and unrepresented counties currently disagree with the broadband providers in 110 priority area instances as to whether an area is served or underserved or unserved.

To address the designation differences of these 110 priority areas it is recommended that the regional consortia (with community leaders of the area) and the broadband providers be required to work together to reconcile their differences in designation before the first round of applications is accepted by the CPUC. Specifically for the 61 areas of the 110 priority areas designated as being served, based on having access solely through mobile wireless technology, indoor mobile testing should be completed in public buildings (schools, libraries, government facilities), businesses, and, if possible residences.

It is also recommended the CPUC set the first acceptance of applications for January 1, 2015, not October 1, 2014 to give all parties sufficient time to implement all the orders.

Finally, to effectively launch the implementation of Resolution T-17443, it is suggested the CPUC schedule and host a meeting(s) in July with the regional consortia and broadband providers involved with the 180* priority areas to discuss the requirements set forth in the Orders.

Appendix 1 provides the specific recommended changes to Draft Resolution T-17443.

** 180 priority areas were submitted by regional consortia and designated as unserved or underserved. CPUC has not rated three submissions, hence 177 are in the Appendix 4 spreadsheet.*

I. Introduction

Draft Resolution T-17443 implements new timelines for applicants to the California Advanced Services Fund (CASF). Pursuant to Public Utilities (PU) Code 311 (g), the draft resolution is available for public comments. Pursuant to Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “CPUC” or “Commission”), I (Thomas W. West) hereby submit these Comments on Draft Resolution T-17443 (“Draft Resolution”) issued by the CPUC’s Communications Division (“CD”) on May 27, 2014.

As written, the Draft Resolution surfaces a major disagreement between the regional consortia/unrepresented counties and the broadband providers. This major disagreement is the designation (served, or underserved or unserved) of each of the 177* priority areas submitted by the regional consortia and four unrepresented counties. The regional consortia and counties designated every one of these priority areas as being unserved or underserved. However, based on the data reported by the broadband providers to the CPUC, the California Broadband Availability Map designates 110 of these priority areas as being served.

The Draft Resolution does not highlight this disagreement or articulate the magnitude of the differences between the groups over the designations. Nor does the Draft Resolution offer a course of action to have these groups reconcile their differences.

Three changes are recommended to the Resolution including: 1) citing these differences in designation as a Finding of Fact; 2) adopting a new Order in the Ordering Paragraphs that sets out a course of action to reconcile these differences before the first applications are received; and, 3) deferring the first round of applications to January 1, 2015 to give time for this reconciliation process to be completed.

To achieve broadband access to all Californians, it is important for all the broadband providers, the affected communities and the CPUC to work together towards that goal. The adoption and implementation of this Resolution, with these recommended changes, would represent a significant step towards this goal.

To promote collaboration the CPUC should schedule and host a meeting(s) in July with the regional consortia and the broadband providers associated with the 180 priority areas, Appendix 4, to thoroughly review the requirements set forth in the Orders in Resolution T-17443 and to stress the importance of working together to ensure that all Californians gain access to broadband in the near future.

II. Discussion

A. The Problem

As part of developing Draft Resolution T-17443 the Communications Division (CD) asked currently existing regional consortia to determine priority areas for broadband projects in each of their regions for the purposes of SB 740. These regional consortia, as well as four unrepresented counties, designated 177* priority areas in 46 different counties as priority areas in their regions. As displayed in Appendix 4, Column 5, each of these 177* priority areas was designated as either unserved or underserved by the consortia/counties.

CD staff performed a high-level validation of the consortia's submitted data by comparing the coordinates for each priority area with the California Broadband Availability Map. As depicted in Appendix 4, Column 6, 110 of these 177* project areas are considered served areas, based on the broadband providers reported data to the CPUC.

In the Priority Areas section (paragraph 6) write-up CD Staff concedes and acknowledges that some of the 110 areas designated as served in the Availability Map may be actually unserved or underserved areas as result of mobile testing or lack of mobile testing. The write-up states: *"this list and high-level validation performed by Staff is meant to spur information gathering which in turn can facilitate broadband deployment in these priority areas."* Staff suggests using "ground-truthing" efforts to determine actual levels of service. Unfortunately, the magnitude of the differences between the regional consortia and the broadband providers and the need to determine how many of these 110 priority areas are eligible for CASF funding by the time of the first applications are submitted calls for a more aggressive course of action.

B. Summary Analysis of the 110 Priority Areas by Technology

CPUC deems an area as being served if a broadband provider reported to be offering the minimum CPUC broadband speed standards using any one of these technologies-- wireline or fixed wireless or wireless mobile. Using its mapping data CPUC designated the 110 areas as being served based on:

- 10 priority areas using only wireline;
- One (1) priority area using only fixed wireless;
- Five (5) priority areas using fixed wireless and wireless mobile;
- Three (3) priority areas using all three technologies;
- 30 priority areas using wireline and wireless mobile; and,
- 61 priority areas using only wireless mobile.

Of the 110 priority areas, in each of nine (9) areas serviced by fixed wireless providers there is just a single fixed wireless provider; in each of the 43 areas serviced by wireline providers there may be one or more wireline providers; and, in each of the 94 areas serviced by wireless mobile providers there may be one or more wireless mobile providers.

To resolve the designation differences between what the regional consortia /counties have submitted to the CPUC as part of developing this resolution and what the various broadband providers have reported to the CPUC there needs to be a process implemented that verifies that all the households in a priority area have broadband access and at the CPUC standard speeds.

The verification process for those 43 areas serviced by “facilities-based” wireline technology providers is pretty straightforward. For each wireline provider serving the area data need to be presented showing how many households in the area it reaches via wireline technology—copper, cable, or fiber; and, that the CPUC minimum standard speeds are available to these households. In cases where the priority area is copper-based the data need to demonstrate long-term sustainability as the speed standards increase.

The verification process for those nine (9) areas serviced by fixed wireless technology providers is more complicated. The verification process for those 94 areas serviced by wireless mobile technology providers is very complicated. Beyond presenting data showing that the fixed wireless or the mobile wireless signal reaches all the households in the area at the CPUC minimum standard speeds there is *the fundamental question whether or not the fixed wireless or mobile wireless signal is available and consistent **inside** the household.*

Furthermore, there has been an ongoing debate nationwide whether or not mobile wireless should be considered broadband, especially when it is the only technology available in a priority area. Such is the case in 61 of the 110 priority areas reported as served in Appendix 4, Column 6.

The CPUC has endorsed mobile wireless as an acceptable technology to meet the broadband needs of Californians, as explained below. In Decision 12-02-015 (February 1, 2012) the CPUC noted “Verizon asserts that mobile wireless broadband be considered for the purpose of determining whether an area is served, unserved, or underserved, including 3G wireless and 4G services.” The Commission adopted technologically neutral criteria and permitted “any form of wireline or wireless facilities-based broadband” to count an area as already served.

The Commission provided the following definition: *“Wireless broadband is defined to mean a fixed or mobile wireless high-speed internet access or connection provided to households, businesses and/or anchor institutions that meet the speeds and program guidelines set forth in this decision.”*

The assumption is the Commission meant that fixed and mobile wireless high-speed access would be available **inside** (not just to) the households, businesses and anchor institutions where people live and work. While mobile coverage is of great value to subscribers as they move about outdoors or in-vehicles this kind of coverage is not the target of the broadband definition for the CASF program.

Research has shown there are significant challenges to having the mobile wireless signal penetrate into building structures and then to maintain consistent and reliable coverage throughout the inside of the structure. Hence, the verification process for mobile wireless, especially if it is the only technology available in a priority area, must present data that clearly demonstrate that the mobile wireless signal reaches **inside** every household and is very reliable within the household; and, at the CPUC minimum standard speeds. Specifically for the 61 areas of the 110 priority areas designated as being served, that only have access through mobile wireless technology, indoor mobile testing should be completed in public buildings (schools, libraries, government facilities), businesses, and, if possible residences. The data also need to show that the tower locations have sufficient backhaul capacity to support the customers during peak demand periods.

C. Recommended Course of Action

Both the regional consortia/counties and the broadband providers have a stake in resolving the differences in the designation of these 110 priority areas. The CPUC and the State also benefit.

Just as the Commission is requiring broadband providers to signify they intend to upgrade the 67 priority areas designated as unserved or underserved, it is recommended the Commission also require the regional consortia (with community leaders of the area) and the broadband providers to work together to reconcile their differences in the designation of each of the other 110 priority areas. Over the next five months these parties should work together to implement processes to gather data on each area to be able to come to agreement or disagreement that the priority area is served, or underserved, or unserved.

By November 20, 2014 they should submit a joint letter to the Director of the Communications Division declaring whether they agree or disagree on the designation of the priority area. If they disagree, each party is permitted to submit a one-page attachment providing data to support its position. Based on this reconciliation process the CPUC can revise Appendix 4 to serve as a guide for applicants.

Finally, to promote collaboration the CPUC should schedule and host a meeting(s) in July with the regional consortia and the broadband providers associated with the 180 priority areas, Appendix 4, to go review the requirements set forth in the Orders in Resolution T-17443 and to stress the importance of working together to ensure that all Californians gain access to broadband in the near future.

APPENDIX 1

Proposed Revised Findings and Ordering Paragraphs

Proposed Revised Findings of Fact

7. Regional Consortia and four unrepresented counties have designated 180* areas as **unserved or underserved** priority areas for broadband infrastructure projects (Appendix 4, Column 5), some of which overlap with other California priority areas. Applying CPUC Mapping Data, only 67 of these 177* areas remain designated as unserved or underserved and 110 areas are now designated as being served (Appendix 4, Column 6). These significant differences between what the broadband providers have reported to the CPUC versus what the regional consortia and four unrepresented counties have submitted, as requested by the CPUC, need to be reconciled to ensure that broadband access will be provided to no less than 98% of California households through funded projects by December 31, 2015.

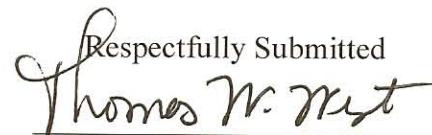
** 180 priority areas were submitted by regional consortia and designated as unserved or underserved. CPUC has not rated three of the submissions, hence 177 are in the Appendix 4 spreadsheet.*

Proposed Revised and Addition to Ordering Paragraphs

2. The CPUC will accept applications on a quarterly basis with the first applications due on ~~October 1, 2014, then~~ January 1, 2015, ~~then~~ April 1, 2015; July 1, 2015; October 1, 2015 and January 1, 2016.

3. **(NEW)** For each of the 110 priority project areas in dispute, the regional consortium (with community leaders of the area) and the broadband provider(s) serving the area are to work together to reconcile their differences in the designations. They are to submit a joint letter by November 30, 2014 to the Director of the Communications, as shown in Appendix 5, declaring that they agree or disagree that the priority area is served, or underserved, or unserved. If they disagree, each party is permitted to submit a one-page attachment providing data to support its position.

June 10, 2014

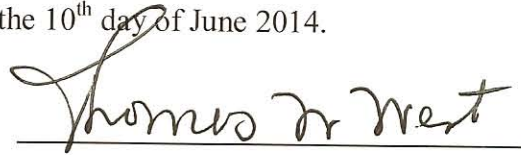
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a certified copy of the foregoing document “**COMMENTS OF THOMAS W. WEST ON DRAFT RESOLUTION T-17445**” on all known parties to DRAFT RESOLUTION T-17445 by email.

Executed in Newport Coast, California, on the 10th day of June 2014.



Thomas W. West

Service List for Resolution T-17443

Service List for Draft Resolution T-17443

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