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Sent via Email

May 1, 2017

Cynthia Walker
Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94105

Re: Comments on Resolution T-17525 – Race Telecommunications CASF Grant to Construct the Gigafy Phelan Project

Dear Ms. Walker,

In accordance with Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC”) Frontier California Inc. (U-1002-C) (“Frontier”) hereby submits comments on Resolution T-17525 issued April 7, 2017, which would award Race Telecommunications (“Race”) \$28.5 million from the California Advanced Services Fund (“CASF”) to deploy broadband to mostly “underserved” households in the Phelan area of San Bernardino County.

Frontier urges the CPUC to reject the draft resolution in its current form because Frontier is currently in construction to expand broadband access by August 2017 to about 5,000 of the 8,361 households this application proposes to serve. The draft resolution is flawed for all of the following reasons:

- (1) It is inconsistent with a prior CPUC decision ordering Frontier to deploy broadband.
- (2) It fails to follow state policy established by the Legislature to leverage and maximize California’s draw of federal universal service funds.
- (3) It relies on evaluation criteria that are outdated and lack any consideration of broadband deployed with funding from the federal Connect America Fund (“CAF”).
- (4) It requires California customers to pay *twice* for broadband in three service areas in one county, while many customers in other parts of the state still have no or very low-speed

broadband service.

The Draft Resolution is Inconsistent with the CPUC Decision Ordering Frontier to Deploy Broadband with Federal Funds and Its Own Investment

Finding Number 9 of the draft resolution states that the proposed \$28.5 million grant is “reasonable and consistent with Commission orders.” However, the draft resolution undermines and is inconsistent with Decision 15-12-005 approving Frontier’s acquisition of Verizon wireline operations. A significant aspect of this decision was Frontier’s commitment to utilize federal and state universal service funds to increase broadband deployment in its service areas. Specifically, Frontier agreed to accept \$38 million per year for six years (\$228 million) from the second phase of the Federal Communications Commission (“FCC”) CAF program (“CAF II”) and leverage these federal dollars with CASF grants and Frontier’s private investment to increase broadband access to nearly 850,000 households. Verizon did not participate in the CAF program, which led the CPUC to deem Frontier’s commitment to access these CAF II funds for the Verizon acquired area as critical to its conclusion that the transaction was in the public interest.¹

Pursuant to that CPUC order, Frontier has commenced its 2017 broadband expansion to households identified in a broadband infrastructure plan provided to the California Emerging Technology Fund (“CETF”) in December 2016 (and updated in March 2017), as required by the CETF settlement agreement the CPUC adopted. Upon release of the draft resolution, Frontier immediately contacted CASF staff to notify them of Frontier construction already underway to about 5,000 households in the Phelan area, some with CAF II funding and some with private investment, all pursuant to D.15-12-005. Frontier then submitted a late-filed challenge indicating that this construction will be complete by August 2017, thereby rendering the majority of these households “served” under the CASF standard.

Awarding a CASF grant to overbuild Frontier’s construction undertaken pursuant to D.15-12-005 would be inconsistent with that decision and the significant public benefit the CPUC recognized from Frontier bringing \$228 million in CAF funds to help California close the

¹ Ordering Paragraph 12, Decision 15-12-005.

Digital Divide. CASF staff should not review CASF grant applications guided only by the CPUC orders adopting rules for the CASF program (some of which are outdated, as addressed below). Rather, staff should be cognizant of all CPUC decisions that order broadband deployment. In this case, the draft resolution fails to take into account Frontier’s broadband construction in compliance with D.15-12-005 and should not be adopted.

The Draft Resolution Fails to Follow State Policy to Leverage and Maximize California’s Draw of Federal Broadband Funds

The Legislature has repeatedly expressed the policy of leveraging and maximizing California’s draw of federal funds to support broadband deployment and has provided the CPUC specific direction to follow that policy when administering the CASF program.² Obtaining *federal* funds to expand broadband in California’s unserved areas reduces the need to use precious *state* funds for that purpose. Decision 15-12-005 follows that policy by ordering Frontier to accept \$228 million in federal CAF funds for broadband in CAF-eligible areas. Just last week, the Legislature endorsed this policy again by amending CASF funding legislation to expressly prohibit award of a CASF grant to overbuild a CAF-funded broadband project.³

The draft resolution, however, does not follow that policy and instead does the opposite of leveraging federal funds – asks California customers to pay *twice* for broadband – once from the *federal* program and once from the *state* program, both funded by surcharges on monthly bills. In the past few months, Frontier has repeatedly asked the CPUC to not award CASF funds to overbuild CAF-funded projects consistent with state policy adopted by the Legislature.⁴ CASF

² See Section 270(c) of the Public Utilities Code, amended by AB 1364 (Fuller 2014) in recognition of California’s continuous status as a net donor to federal universal service programs by several hundreds of millions of dollars per year. See Section 914.7(a)(8) of the Public Utilities Code, added by SB 745 (Hueso 2016), requiring the CPUC to report to the Legislature on leveraging non-CASF funds to achieve broadband goals.

³ AB 1665 (Garcia), analysis of Assembly Committee on Communications and Conveyance (April 25, 2017).

⁴ See Comments of Frontier on CASF Staff White Paper “High Impact Areas for Broadband Availability” filed March 21, 2017; Comments of Frontier on “Order Reopening the Proceeding for Comments on the Implementation of Senate Bill 745” filed April 7, 2017, in R.12-10-012 (discussing issues the CPUC should address to ensure that the CASF program meets statutory requirements to leverage CAF II and CASF funds and maximize California’s draw of federal universal service funds to achieve state broadband deployment goals). See also Comments of Frontier on Resolution T-17548, filed January 30, 2017, objecting to award of \$3.1 million in CASF funds for construction of cell towers unrelated to the

staff apparently interprets the CPUC’s 2012 decision on the CPUC grant process to supersede subsequently enacted state policy – not to mention the subsequent availability to California of hundreds of millions in new federal broadband dollars. In these comments, Frontier again respectfully requests the CPUC to follow state policy and not award another \$28.5 million of dwindling CASF dollars for a project that would overbuild a CAF-funded project that is just months from completion.

The Draft Resolution Relies on Evaluation Criteria that are Outdated and Lack Proactive Consideration of the Connect America Fund

The draft resolution follows evaluation criteria adopted in 2012 and considers “priority areas” identified by consortia in 2014. However, this evaluation fails to incorporate or acknowledge the areas identified by the FCC as eligible for CAF funding. These CAF-eligible areas are clearly identified by Census block on the map posted on the CPUC’s website and yet consideration of whether a project seeking CASF funds is a CAF-eligible area is not a checklist evaluation criteria. Frontier respectfully suggests that CASF staff should proactively review CAF eligibility for each potential CASF project rather than rely solely on a challenge.

In this case, although Frontier missed the official challenge window while 2017 broadband construction plans were finalized, staff review of the CAF-eligible map, combined with independent outreach to the relevant CAF provider (there is only one for each area) would have revealed that state broadband dollars could be preserved because Frontier already was upgrading service in this CAF-eligible area. The draft resolution does not follow such a reasonable approach. Indeed, the words “Connect America Fund” do not even appear in the resolution. Thus, contrary to the proposed statement in Finding Number 9, the resolution awarding this grant follows an evaluation process that is not “reasonable” and should not be adopted.

underlying last-mile or middle-mile broadband project. Frontier hereby requests that all of these comments be incorporated by reference. Frontier also participated in the CPUC’s workshop on the staff White Paper where it was discussed that CASF grants should not be awarded to overbuild a CAF-funded project.

The Draft Resolution Requires Customers to Pay Twice for Broadband to the Same Households

As stated in Frontier’s challenge and subsequent information provided to CASF staff, Frontier is just a few months away from completion of its broadband expansion to about 5,000 of the 8,361 of the households in this pending application, many of these with CAF II funding. Given that customer surcharges on monthly bills fund both CAF and CASF programs, the award of CASF funds to overbuild Frontier’s CAF-funded construction requires customers to pay *twice* for broadband. Customers pay many state and federal surcharges to fund important public purpose programs – and they will be asked to pay more under pending CASF legislation. The CPUC should not adopt this draft resolution and ask all California customers to pay *twice* for broadband in three service areas in one county, while many customers in other parts of the state remain “unserved” with no or very low-speed service.

For all of these reasons, Frontier requests that the CPUC reject the draft resolution in its current form.

Respectfully submitted,



Charlie Born
Senior Manager, Government
& External Affairs



Jacqueline Kinney
Vice President, State Government
Affairs – California

CERTIFICATE OF SERVICE

I certify that this day I served by e-mail a copy of the “**Comments on Resolution T-17525 – Race Telecommunications CASF Grant to Construct the Gigafy Phelan Project.**” to the parties on the service list attached to the draft resolution.

May 1, 2017 at Sacramento, California



Amy Warshauer

Frontier Communications

Service List for Resolution T-17548
as of 1/24/17

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