

BOLINAS COMMUNITY PUBLIC UTILITY DISTRICT

BCPUD

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March 2, 2017

Via email You-Young.Sellden@cpuc.ca.gov

Ms. Clover Sellden
Regulatory Analyst
California Public Utilities Commission
Communications Division
505 Van Ness Avenue, Third Floor
San Francisco, California 94102-3298

RE: CPUC Staff White Paper: "High Impact Areas for Broadband Availability"

Dear Ms. Sellden:

On behalf of the Bolinas Community Public Utility District ("BCPUD"), we respectfully submit this comment letter on the California Public Utilities Commission ("CPUC") Staff White Paper: "High Impact Areas for Broadband Availability" ("Staff White Paper").

The BCPUD is a special district of the State of California providing water, sewer, solid waste disposal and related utility services to the residents of Bolinas in coastal West Marin, an unincorporated area of Marin County. The Bolinas Community Public Utility District is governed by a five-member, publicly elected Board of Directors and, due to the community's unincorporated status, the Board often is requested by residents to provide a forum for discussion and action on issues outside the district's specific scope of utility services. One such issue of top concern for our community is the lack of reliable, high-speed broadband in Bolinas, hence our interest in providing comments on the CPUC Staff White Paper.

The BCPUD strongly agrees with the Staff White Paper's methodology and approach. Specifically, the BCPUD applauds the methodological objective incorporated in the paper to identify focal point areas in California -- such as Bolinas -- where the maximum impact can be obtained for the limited remaining pool of California Advanced Services Fund ("CASF") Broadband Infrastructure Grant/Revolving Loan Account grant funds. We concur that that a pool of unserved and underserved residences (and also businesses and community institutions) in a geographically confined area, where the cost of service per premise is more economical, is a sound methodology for maximizing the impact of these limited funds.

The BCPUD also strongly agrees with the Staff White Paper's identification of Bolinas as a "high impact area". Bolinas is a relatively densely populated community comprised of both unserved and underserved homes, as defined by the Staff White Paper's definition of broadband availability. In fact, we respectfully submit that the service problems in Bolinas are even more severe than documented in the Staff White Paper. For example, the Staff White Paper correctly states that the best available internet service presently available in Bolinas nominally is six (6) megabits per second download (from any broadly based provider, leaving aside problematic satellite service), which already is too slow for many end-users. However, it has been the case for years already and remains so today that this nominal maximum speed, or

anything close to it, frequently is unavailable in the evenings when residential demand peaks. It is not at all unusual, as confirmed by one of our BCPUD directors using speedtest.net, for speeds in the evening *to be less than 3 megabits per second download and less than 1 megabit per second upload.*

Moreover, there is an internet access problem even more serious than download speed in Bolinas: the BCPUD has been informed by many community members over the past year that they have been *unable to obtain DSL service at all due to lack of local capacity.* At a recent BCPUD Board meeting, a downtown business owner informed the district that she was unable to obtain DSL service at all at her property, making it difficult to carry out her business, which relies on frequent internet communication with the public.

The BCPUD is leading the effort to improve broadband internet access in Bolinas by forming an Internet Access Committee and working closely with the County of Marin. In late 2016, community members petitioned the BCPUD to take a leadership role in the effort to improve broadband access for the residents of Bolinas. The BCPUD Board established an "Internet Access Committee" to investigate the problem and recommend possible solutions. The committee subsequently met with three independent internet service providers operating in other portions of West Marin who have expressed interest in entering the Bolinas market. However, the providers informed the committee that the capital cost for building out a local distribution system in Bolinas is a significant obstacle relative to the total market size.

As noted above, the BCPUD's Internet Access Committee has been working closely with our Marin County Supervisor, Dennis Rodoni (District 4) and, with Supervisor Rodoni's encouragement, has availed itself of the resources of the Marin Broadband Task Force ("MBTF"). Supervisor Rodoni is the head of the MBTF and is the Marin County representative on the Oversight Committee of the North Bay-North Coast Broadband Consortium ("NBNCBC"). Supervisor Rodoni and the MBTF strongly support BCPUD's efforts to improve internet access for the Bolinas community.

As the Staff White Paper recognizes, Bolinas was one of the initial Marin communities registered by MBTF with the CPUC in 2014 as a "Priority Area" for CASF infrastructure grant funding. Another West Marin unincorporated community, Nicasio, also was registered at that time and was awarded a CASF infrastructure grant in July 2016. Thus, as the BCPUD moves ahead to secure partners to solve the lack of broadband in Bolinas, with the continued support of Marin County, it does so as part of a coherent approach as outlined by MBTF on behalf of the County.

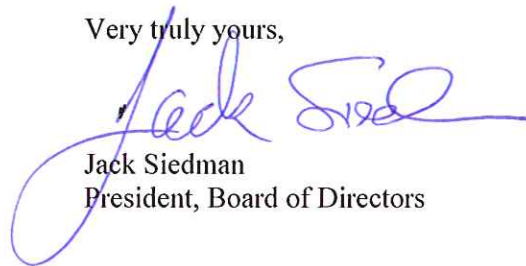
Next steps for the BCPUD's Internet Access Committee. The BCPUD's Internet Access Committee has moved expeditiously to map out a proposal with the goal of radically improving internet access in Bolinas. The committee soon plans to recommend that BCPUD issue a Request For Proposal that could lead to a CASF infrastructure grant proposal in the coming months, by a public-private partnership, for a new high quality local internet distribution system in Bolinas.

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The BCPUD urges the CPUC to proceed with expedited review of CASF infrastructure grant proposals by High Impact Area communities. A key issue for the Bolinas community, if the BCPUD indeed is able to move swiftly to submit a CASF infrastructure grant proposal, is that the CPUC provide expedited review of such proposals from High Impact Area communities (i.e., "fast-track status" for communities that are acknowledged priority areas). The BCPUD therefore requests that CPUC staff consider adding expedited review for priority communities to its White Paper recommendations to the CPUC.

In closing, we would like to express our appreciation to the CPUC staff for the intelligent and thoughtful approach set forth in the Staff White Paper, for the appropriate selection of Bolinas as one of the High Impact Area communities, and for considering our request that Bolinas and the other prioritized communities receive expedited review of their CASF infrastructure grant proposals.

Very truly yours,



Jack Siedman
President, Board of Directors

cc: Supervisor Dennis Rodoni