

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

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

R12-10-012
(Filed October 25, 2012)

**COMMENTS OF THE NORTH BAY NORTH COAST BROADBAND
CONSORTIUM (NBNCBC) ON ASSIGNED COMMISSIONER'S
AMENDED SCOPING MEMO AND RULING PHASE II**

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I. INTRODUCTION

Pursuant to this Commission's Rule 1.4(a)(2)(ii) "Comments in response to a Rule-making," the North Bay North Coast Broadband Consortium (NBNCBC) Oversight Committee (Composed of Supervisors Hamburg (Mendocino), Rodoni (Marin), Dillon (Napa), and Hopkins (Sonoma) and non-voting consortium manager Tom West) submits these comments to the questions posed in the Assigned Commissioner's February 14th, 2018 Amended Scoping Memo on Phase II for modifications to the California Advanced Service Fund.

The mission of NBNCBC is to ensure the needs for broadband access and adoption are met in every corner of all four counties. With eight (8) past CASF grants awarded in our consortia region (Mendocino 6, Sonoma 1, and Marin 1) we have a strong interest in the CASF program. We have also participated in legislation related to prior modifications of the program. We now welcome this opportunity to participate in the development of the new guidelines for the Infrastructure, Line Extension and Consortia Accounts.

II. COMMENTS ON STAFF PROPOSALS REGARDING THE BROADBAND INFRASTRUCTURE ACCOUNT

The NBNCBC would like to make the following comments on the Staff proposals related to the Broadband Infrastructure Grant Account.

1.1. Background

Middle-Mile Deployment. AB 1665 specifies that projects that only deploy middle-mile infrastructure are not eligible for grant funding. For a project that includes funding for middle-mile infrastructure, the Commission is required to verify that the proposed middle-mile infrastructure is indispensable for accessing the last-mile infrastructure.

- The NBNCBC believes that this unfortunate provision is detrimental to closing the digital divide in California, as a robust, accessible and affordable middle-mile infrastructure is indispensable for the deployment of competitive last-mile services. It is compelling to the State's interest to make sure that such middle-mile infrastructure exists, and the PUC should do everything possible within the constraints of AB1665 to fund such projects. The definition of "Indispensable" should account for middle-mile affordability that will make last mile projects feasible.

Project Preferences. The proposed guidelines require the Commission to give preference to projects in areas where Internet connectivity is available only through dial-up service that are not served by any form of wireline or wireless facility-based broadband service or areas with no Internet connectivity. However, the Commission is not prohibited from approving funding for projects outside of the areas that are designated as prioritized.

- NBNCBC recommends this guideline be restated as follows: "Requires the Commission to give preference to projects in areas where Internet connectivity is available only through: 1) dial-up service, 2) wireline and wireless technologies infrastructure determined to be unsatisfactory, or 3) areas with no Internet connectivity."

- NBNCBC’s rationale is the belief that “any form of wireline or wireless facility-based broadband service” should not include unsatisfactory wireline or wireless facility-based broadband service. In the NBNCBC region, technologies which primarily involves first generation DSL, mobile wireless, satellite service, and many terrestrial fixed wireless are commonly seen as inadequate Internet service solutions.
- There are many households and communities in the NBNCBC region, primarily in rural areas, which must rely solely on mobile wireless, satellite, or if they’re “lucky” terrestrial fixed wireless or DSL as their only available Internet service options.

Through community outreach and engagement conducted by the NBNCBC, a significant number of these households and communities have expressed they are not satisfied with mobile wireless, satellite, terrestrial fixed wireless, or DSL services being their only available option. According to a number of the communities, mobile wireless, satellite, point to point fixed wireless¹, and DSL internet services are not satisfactory primarily due to the services’ unreasonable terms including:

- high monthly costs (measurable rates);
- minimal service speeds;
- jitter/latency issues; and,
- limited data caps.

¹ A few Fixed Wireless providers do offer unlimited and symmetrical high-speed services (such as 30 Mbps) which residents find affordable and very satisfactory.

- Underserved communities view Internet as a necessity, common to a basic utility, and often accept the unreasonable terms of their unsatisfactory services because they believe something minimal is better than nothing. A number of the communities in the NBNCBC region have complained that mobile wireless, satellite internet, and point to point wireless services do not effectively support at-home education and/or business, sometimes causing households to permanently relocate to higher density areas where adequate internet services (e.g. fiber-optics, wireline) exist. It is evident these unsatisfactory technologies are not sustainable Internet solutions for the future in the NBNCBC region.

Technologies Used for Deployment. AB 1665 requires the Commission to recognize that broadband advanced communication services include both wireline and wireless technologies. However, the Commission is not prohibited from approving funding for projects outside of the areas that are designated as prioritized.

- The NBNCBC recommends the following change to this guideline: "Requires the Commission to recognize that broadband advanced communication services include both wireline and wireless technologies that are determined to be satisfactory to provide advanced broadband services and Internet solutions. However, the Commission is not prohibited from approving funding for projects outside of the areas that are designated as prioritized."
- NBNCBC believes broadband advanced communication services are determined to be satisfactory if they provide the following service thresholds.

1) Minimum Broadband Speeds

Long before the passage of AB 1665 NBNBCB embraced the FCC speed standards of 25 Mbps downstream and 3 Mbps upstream as the minimum access capabilities we believe providers should be currently offering. And, as they deploy new or upgrade existing infrastructure that infrastructure should be able to have the capacity to increase speeds as demand dictates with minimal additional investment.

We encourage the Commission to only support CASF grants where the provider is committed to deploying infrastructure that will not only meet the current minimum California standards but also have the capacity to increase speeds over time with minimal additional capital investment.

To invest the \$300 million CASF Infrastructure Grant funds to only reach 6 Mbps downstream and 1 Mbps upstream would be an unwise investment. In our region we can point to several such projects where speeds are now considered inadequate² and evidence from one previous CASF area where a new homeowner was told that the (CASF-subsidized) DSL used by the previous owner was “grandfathered” in and that they can no longer provide DSL service and the resident should instead seek a satellite solution.³

² 2009 Resolution T-17183; 2009 Resolution T-17195

³ Website contact from Lucas McNerthey on March 22, 2018 to the Broadband Alliance, seeking help for this situation. CASF project T-17195 (Comptche, Mendocino County)

2) Reasonable service plan pricing

While a provider can willingly price an individual service plan differently among various locations where the same service and plan is offered, reasonable monthly costs should be determined by the CPUC for any projects utilizing CASF awards. Pricing should not be biased towards the geographical region where services are deployed.

The CPUC should only award funding from the CASF if the wireline and wireless technologies are able to provide services for reasonable monthly prices. Reasonable monthly prices should be determined by creating uniformity of a provider's individual service plans' prices among all regions in California. The reasonable monthly price should be the lowest price offered in all regions of California for the individual service plan.

Example: Provider's service plan costs \$40/month in location A while the same service plan costs \$50/month in location B and \$60/month in location C. Since the provider is able to provide the same service in received location C cheaper in location A, the provider would have to set their reasonable service plan price to \$40/month for all projects utilizing awards from the CASF.

3.) Reasonable data caps/limitations

It is extremely important for the CPUC to recognize data limitations. According to iGR research⁴, the average monthly broadband usage in U.S. homes is 190 gigabytes per month. Service plans offered by various wireline and wireless technologies in the NBN/CBC region offer different monthly limitations for data usage, ranging from only a few gigabytes to terabytes. The CPUC should determine reasonable data cap limitations for any individual service plans utilizing CASF awards. Reasonable data cap limitations should be determined by analyzing the market's current monthly data needs and formalizing a reasonable data cap limitation that meets the public's needs. As a start to the process, using the national average, setting a minimum of 190 gigabytes per month should be a reasonable data cap/limitation.

The CPUC should recognize that not all wireline or wireless technologies provide equal services; and, wireline and wireless technologies used are not as important as the quality of services provided by the technologies.

Since CASF funds are generated by public ratepayers, the CPUC should require awarded projects to deploy capacity that can be expanded over time with minimal

⁴ <https://igr-inc.com/about-igr/>

additional capital investment while meeting the minimum required California level of service.

This methodology is intended to apply uniformity among all CASF grant awardees and obligate provided services to meet standards established by the CPUC and the public since the public are the generators of CASF funding and are also the end consumers of CASF products. While the provider is the owner and operator of the service, the CPUC should be the regulator of the quality of service provided by any projects utilizing funding from the CASF and Infrastructure Account.

1.3 Definitions

The Staff proposed guidelines call for the “Baseline Data” to be the reported served status of broadband at or above 6 Mbps downstream and 1 Mbps upstream in California by consortium region as of December 31, 2016.

- Normally, this would be acceptable. However, given that five wild fires in October 2017 destroyed significant portions of broadband infrastructure in three of four of the NBNCBC counties (Mendocino, Napa and Sonoma) the current Baseline Data and the Interactive Broadband Map do not reflect this fact. Parts of Ventura, Santa Barbara and Los Angeles counties may have the same problem.
- We recommend the CPUC use the appropriate internal processes and protocols to update the Baseline Data and Interactive Map to accurately depict reality as a result of the wild fires. The guidelines should reflect this special circumstance.

1.9 Right of First Refusal

AB 1665 requires the Commission to annually offer existing facility-based providers the opportunity to demonstrate that they will provide broadband access to delineated unserved areas within 180 days and prohibits the Commission from approving funding for a project in those areas also known as right of first refusal (ROFR), provided the existing provider demonstrates that it will deploy broadband or upgrade existing broadband service throughout the project area.

- It is unfortunate the Legislature, in passing AB 1665, permits the continuation of the archaic annual rolling “right of first refusal” by incumbent providers. This action has caused and will continue to cause smaller ISPs to hesitate investing energy and resources to develop and submit applications for CASF Infrastructure Grants.
- We believe incumbent facilities-based broadband providers, currently offering meager services (less than 6 Mbps down and 1 Mbps up) to unserved areas, should be given only one opportunity to submit a ROFR. And, the date for such a submission should be on or before January 15, 2019.
- We recommend the Commission propose this change to the Legislature to remove this rolling obstacle to encouraging all ISPs to help achieve the 98 percent goal in each region.
- In the meantime, the Staff needs to make it clear in these proposed guidelines that if an ROFR is not submitted for an unserved area and another ISP submits an ap-

plication for a CASF Infrastructure grant for that area the incumbent cannot file an ROFR in subsequent years to block that project.

- We also recommend the guidelines be clear as to whether or not an incumbent can file a challenge if they have not submitted a ROFR.

1.10 Treatment of CAF II Areas

AB 1665 specifies that Connect America Fund Phase II (CAF II) areas are ineligible for CASF funding until July 1, 2020, unless the existing facility-based broadband provider has notified the Commission before July 1, 2020 that it has completed its CAF deployment in the census block. However, an existing facility-based broadband provider is eligible to apply for CASF funding pursuant to the CAF II fund to expand broadband service within identified census blocks, as needed.

- Nothing in AB 1665 prevents the CPUC from requiring the providers with CAF II funding from informing the CPUC before July 1, 2020 of their specific plans as to where they will deploy infrastructure by July 1, 2020.
- We recommend the guidelines require these providers to submit their specific plans to the CPUC by January 15, 2019 so the Interactive Broadband Map can accurately reflect these actual plans. This action will then enable other ISPs to begin to develop projects for areas that are not going to be deployed with CAF II funds.

Disclosure of Information. The guidelines propose the Commission not disclose publicly information submitted by the facility-based broadband provider that includes plans for future deployment, but allows the Commission to disclose publicly information re-

garding the area designated for broadband deployment, the number of households or locations to be served, and the estimated date the deployment will be completed.

- Both the CAF fund and the CASF fund are *publicly* funded accounts, and as such there is an expectation of transparency in how public money is being utilized.

When public monies (from residents of all income levels) are being used to subsidize the private infrastructure of large and profitable corporations, such companies must accept that a public accounting is required. The CAF requires the release of the specific locations to the public⁵ and the CASF program should follow suit although without the delayed timeframe. Communities, local government officials, public safety officials, consortia, and advocacy groups are tired of continuing to wait for incumbents to share deployment plans when broadband has become critical to the operations of businesses and agencies. This lack of transparency creates a situation where it is impossible for communities and consortia to work as partners in deployment activities. The use of public monies justifies accountability to the public, and the PUC must require greater transparency and accountability from providers in this program with the specifics of their deployment plans.

⁵ From communication with FCC Wireline Attorney Advisor Jesse Jachman: Carriers are required to report on their deployment with CAF support to the Universal Service Administrative Company (USAC). By March 1, 2018, carriers must report the latitude and longitude of the locations deployed to, the addresses of the locations, the maximum speed available, and the date of deployment. Once validated, USAC will make publicly available the data carriers report. Later in 2018 USAC will release a map displaying that data. The Commission and USAC are currently developing the map, and once that is available, it will be the go-to place to answer your questions. USAC will refresh the data as carriers provide updates/revisions.

III. COMMENTS ON STAFF PROPOSALS REGRADING THE PUBLIC LINE EXTENSION PROGRAM (LEP)

The NBNCBC has several comments with regard to the Line Extension Program (LEP) and special situations we would like the PUC to consider.

Background

AB 1665 directs the Commission to consider limiting funds to households based on income so that funds are provided only to households that would not otherwise be able to afford a line extension to the property, to limit grants on a per-household basis and to require a percentage of the project to be paid by the household or owner of the property.

The consortium believes a focus on low income is worthwhile and appropriate, however those criteria should not be a limiting factor. We also suggest the wording be amended to include “all projects” where an existing cable provider is the only available option and the project area is unserved and not limited to household income.

- There are many communities within the NBNCBC region that are not low income and yet in need of adequate broadband services. Selected communities have access to ISP’s who willingly apply for grants from the CASF Infrastructure account, such as AT&T and Race Communications; however, other communities only have access to cable providers such as Comcast, who have not historically applied for CASF grants. As the LEP is designed in favor of cable companies, (i.e. Comcast, Charter) and, as many non-low income and unserved communities in the region only have nearest access to cable provider infrastructure, the LEP option is attractive to the region. Communities and households in Comcast’s footprint, in documented in-

stances, were quoted thousands of dollars per household - quotes that even medium income or higher income households found unaffordable. For perspective, in California low income requirements are set at \$49,200 or less; however, the median income in Sonoma County is \$63,910, Mendocino County is \$51,917, Napa County is \$66,335, Marin County is \$91,477. In the NBNCBC region, historical quotes to install Comcast's services have ranged from a few thousand dollars to hundreds of thousands of dollars per household for a line extension, leaving many low income, medium income, and even high-income communities equally disconnected and unable to afford a line extension.

- **Example:** In 2012, Comcast quoted a community of twenty-five homes on Canyon Road in Forestville, Sonoma County, \$126,000 for installation of services. Comcast agreed to a cost share where Comcast would contribute \$56,000 and the twenty-five, medium income and high income, homes would divide the remaining \$70,000 equally among each household. Unfortunately, not every household could afford their share of the community investment and the project didn't come to fruition. This unfortunate scenario has been experienced in a number of communities in the NBNCBC region.
- Another issue that has been brought to our attention is the difficulty some residents experience in simply trying to get a quote for a line extension. Since the cable companies are not under the jurisdiction of the PUC it appears the PUC would have no leverage to get Comcast to give a quote and it would only hurt residents if they

tried to require it. We recommend the Commission develop a guideline to address this issue.

Amount Available for Grants

Pursuant to AB 1665, the aggregate amount available for awards is \$5 million dollars.

- In the NBNCBC region, at least one individual CASF Infrastructure project has far exceeded \$5 Million. Obviously, the amount available through the LEP for the entire state of California will not provide adequate funding resources to efficiently close the digital divide among many of our communities. In order to effectively close the divide, increasing the funding in the LEP account will allow an accelerated timeline for NBNCBC member counties to close the digital divide.
- The consortium believes a \$5 million limit is inadequate funding for this statewide LEP and recommends the Commission propose to the Legislature an increase in funding for this part of the program.

Unserviced household: An unserved household is a household for which no facility-based broadband provider offers broadband service at speeds of at least six (6) megabits per second (Mbps) downstream and one (1) Mbps upstream.

- The consortium believes broadband service should be a minimum of 25 Mbps (megabits per second) downstream and three (3) Mbps upstream.

Income Threshold

Applicants who would qualify for the California LifeLine 25 or CARE 26 Programs would automatically meet the qualifying income threshold. Staff proposes that exemptions to qualifying income requirements be made for applicants whose properties are used

for such activities as farming, for low-income housing, for educational purposes, among others.

- While we support California LifeLine or CARE Programs automatically meet the qualifying income threshold, we also believe an unserved community which has an ISP available as the only available supplier and the ISP is unwilling⁶ to apply for funding from the infrastructure account should be eligible for grant funding through LEP applicants.

Subsidy Level

Staff invites parties to comment on what the appropriate subsidy level should be used for the LEP consumer and that of the non-LEP consumer, given that AB 1665 requires a percentage of the project to be paid by the household or owner of the property and that any infrastructure built with funds from the LEP become the property of the facilities based broadband provider.

- The consortium agrees for low-income applicants 95% is an acceptable subsidy. However, we believe it is appropriate if applicants do not meet income threshold or exempt projects, grants be applied on a floating basis, but not less than a 70% subsidy.
- Medium and high-income communities are equally in need of connectivity; however, the NBNCBC recognizes that low income, medium income, and high-income communities aren't equally capable of providing their share of the matched line ex-

⁶ One ISP CEO has verbally stated they have no interest in applying for an infrastructure grant from CASF or ISP has shown no historical evidence of participation in filing grant applications since creation of CASE.

tension cost. A 95% subsidy level for low income households proposed in the LEP is a reasonable subsidy level (specifically for low-income only); however, as an example using the CASF Broadband Infrastructure Account subsidy levels, medium and high-income households should receive no less than 70% subsidy levels and may be determined case by case in accordance to Infrastructure Account procedures.

Eligible Applicants

NBNCBC suggests that an “eligible applicant” be defined to also include one individual representing multiple unserved households in a project area.

Eligible Projects

We understand and accept the stated guidelines; however, we do believe an eligible project be defined to also include multiple unserved households, which are owned by multiple property owners but represented by an individual representative applicant.

Maximum Length of Total Line Extension

The PUC requested comments on the maximum and minimum length of a proposed line extension. The consortium does not see a valid reason to include a minimum length of total line extension required for a LEP project; however, we believe the maximum length for a LEP project should be calculated and determined accordingly. We have provided an example of a potential way to calculate the maximum length of a proposed line extension.

- NBNCBC member counties have engaged with a number of community projects that have been initiated with one household reaching out to an ISP asking for a line

extension quote. As a result, many of those individual households discovered the installation to their house would cost thousands, if not hundreds of thousands of dollars to extend service to their home. In response, and in order to increase feasibility, these individual households organized their communities to share overall costs on a per household basis. This method has increased the feasibility of connecting unserved households and communities more efficiently. Because LEP is designed to allow individual households to apply, the NBNCBC believes the \$5 Million account will quickly deplete and will not effectively close the Digital Divide. If individual households are allowed to apply on behalf of a community of multiple households, much like a provider applies on behalf of a community through the CASF Infrastructure Account, we believe resources will be used more effectively and more quickly close the Digital Divide.

$$\text{LEP Project Maximum Extension Length per Household} = \frac{\sum 2 \text{ Projects Total Length of fiber Used (in feet)}}{\sum \text{Total Households in project area}}$$

Project Area Example	Total Miles of Cable	Total HHs
Cazadero	61.41	329
Dry Creek	58.4	514
TOTAL	119.81	843
Average Length of Fiber (Miles)/Household	0.142	
Average Length of Fiber (in feet)/Household	750	*Average Length of Fiber (Miles)/ Household x 5,280 feet

The above chart represents (2) two projects that were budgeted for telecommunications expansion by independent contractors. The (2) two projects were intended to utilize CASF grants to complete. The Dry Creek Project and Cazadero projects have not been submitted for consideration nor have received any other external funding other than for cost study development.

Since these projects were budgeted for low-density communities where LEP projects would generally be most costly, average length of fiber used per household was calculated using (2) rural/low density case studies. These case studies could represent the "ex-

treme" case of the length required for a LEP project - a heavily-wooded, rural, hard-to-serve area. According to the calculation using data from (2) case studies, the average length (in feet) per household is equal to 750 feet per our calculation.

The project will be constructed on existing rights of way and on the project property.

Rights of way will be required from property owners if no public right of way exists.

IV. COMMENTS ON STAFF PROPOSALS REGRADING THE CONSORTIA ACCOUNT

Background

The opening paragraph is unclear. We suggest the following revision to the paragraph.

- “AB 1665 was signed into law on October 15, 2017. A key goal of the bill is to provide broadband access to no less than 98% of the California households in each regional consortia area. The regional consortia areas are those identified by the Commission on or before January 1, 2017. To achieve this goal it is the objective of the Commission to approve funding by December 31, 2022, for infrastructure projects that will provide this broadband access.”

Definition

Add a statement that clearly defines the regional consortia areas that are to be used to measure the state’s achievement against the 98% broadband access goal by region. We offer a suggested statement.

- “Regional Consortia Areas” to be applied in implementing AB 1665 are those geographic areas identified by the Commission on or before January 1, 2017. A map and list of the regional consortia areas may be found at the following location on

the CPUC website at [ftp://ftp.cpuc.ca.gov/Telco/CASF/Consortia/CONSORTIA MAPS v2/CASF Approved Consortia 20170430.pdf](ftp://ftp.cpuc.ca.gov/Telco/CASF/Consortia/CONSORTIA_MAPS_v2/CASF%20Approved%20Consortia%2020170430.pdf).”

Account Objectives and Activities

- We understand the implications of the new objectives, as stated in the first paragraph. AB 1665 has narrowed the focus of what a regional consortium can do in an annual work plan going forward. This more narrow focus will potentially impact our ability to fully represent the full spectrum of needs for broadband planning, deployment, access and adoption throughout our counties and region.
- We appreciate the staff’s articulation of the type of activities a regional consortium will be able to undertake with a grant from the Consortia Grant Account. This is very helpful guidance.
- We have always understood the Commission to be the final authority related to the CASF Program and the grants we receive. We do encourage the CASF staff to lead, interact and work more closely with the regional consortia as ONE TEAM that is seeking to achieve the broadband goals for the State of California. In essence, the regional consortia are the boots on the ground representing the Commission and our respective constituencies.

Eligible Applicants.

We need more clarity on the consortium eligibility criteria. We would suggest the guidelines clearly state the Commission is not open to creating new “regional consortia areas.”

Given the above statement to be accurately stated, we understand that a new group of entities within any of the Commission's defined regional consortia areas may apply for the Consortium Grant. What is not clear is whether or not multiple entities from more than one of the Commission's defined regional consortium areas can join forces and apply for a Consortium grant. If so, how does such a Consortium apply the 98 percent goal in its Action Plan and Work Plans?

In essence, must an application for a Consortia Grant be for one of the Commission's defined regional consortium areas or can an application for a Consortium Grant be for all or portions of two or more of the Commission's defined regional consortium areas?

Information Required from Applicants. We understand and accept the stated guidelines for Items 3, 4 and 5. However we do have concerns with some parts of the statements in Items 1 and 2.

Item 1 states the proposed applicant for a Consortium Grant must submit an Action Plan and Work Plan as part of the application. We agree there should be one overall Action Plan for the Consortium. However, given the CASF goal and revised Account objectives and how the Consortium is organized there may be a need or desire to have multiple Work Plans to carry out the Action Plan.

There are at least two instances that suggest the need for multiple Work Plans. First, at any one time a Consortium may be assisting more than one applicant in project development or grant application process. This would call for separate work plans. Second, in instances such as NBNCBC, we have found that developing a work plan for each of the

four counties to be most effective. Given the focus is on developing infrastructure projects to bring broadband access to “last mile” “unserved” communities our experience has shown the needs, strategies and potential applicants vary from county to county. We, therefore, urge the CPUC staff, to restate the guidelines for Item 1 to reflect these realities.

Item 2 this new requirement calling for annual audit of expenditures places a potentially costly burden on a Consortium, especially given the small amount of a grant.

It is unclear what the language in the bill suggests. Here are some questions.

- Is it meant to re-enforce that the current requirement of an annual Attestation Report by an independent certified auditor could satisfy the new requirement?
- In most instances a consortium’s fiscal agent is part of an organization that has an annual audit conducted of all the expenditures of the organization including those in the CASF grant. Could such an audit meet the new requirement?
- Or, must a Consortium engage an independent audit firm to just do annual audit of the CASF grant?
- If either bullet 2 or 3 applies does this new requirement replace the current requirement of an Attestation Report?

Reporting. The issue of whether to have a quarterly progress reporting and payment request cycle versus a bi-annual cycle boils down to the timing of the flow of grant funds. Some consortia may not be able to float the costs associated with execution of their work plans for six to nine months, the bi-annual cycle plus the time for approval and issuance of the payment. Other consortia may be able to manage to cover the costs. Therefore, we

recommend each consortium in its application state its preference for a quarterly or bi-annual reporting and payment request cycle and have the content of the application reflect that choice.

V. CONCLUSION

Thank you for this opportunity to provide comments in this proceeding on behalf of the four (4) counties in the NBNCBC. We feel that the Infrastructure, Line Extension and Consortia Accounts have the potential to reduce the Digital Divide by providing the needed resources in our counties.

Respectfully submitted,

Dated: April 16th, 2018

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