



Central Coast Broadband Consortium

Ms. Cynthia Walker
Director
Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

November 25, 2019

Subject: Central Coast Broadband Consortium Comments on Draft Resolution T-17674 Approval of funding for the grant application of Cruzio Media, Inc. (U-7150-C), from the California Advanced Services Fund (CASF) up to the amount of \$2,445,153 for the Equal Access Santa Cruz Project for unserved areas in Santa Cruz County.

Introduction

Per California Public Utilities Commission (CPUC) Resolution T-17529, the Central Coast Broadband Consortium (CCBC) is the California Advanced Services Fund (CASF) consortia grant recipient representing Monterey, San Benito and Santa Cruz Counties. The CCBC is a party to Rulemaking 12-10-012 and respectfully submits these comments in response to Draft Resolution T-17674, which approves funding from the CASF infrastructure account for the Equal Access Santa Cruz Project. Our comments are being provided to everyone on the designated service list.

Discussion

1. CCBC strongly supports Resolution T-17674 as drafted and published by CPUC staff.

The draft resolution balances the California Public Utilities Commission's (CPUC) responsibility to prudently manage CASF with the needs of our region and the economic constraints that all Internet service providers operate under.

2. The Equal Access Santa Cruz Project addresses specific inequities within our region.

The residents of the mobile home communities that will be served by the Project typically have household incomes that are significantly less than their more fortunate neighbors. Providing affordable, high speed Internet service to will allow them to fully participate in our economy and society, and to gain access to essential educational opportunities, health care, government services and employment opportunities.

3. The Equal Access Santa Cruz Project significantly furthers the CCBC's goal of achieving 100% availability of broadband service at a minimum of 100 Mbps download and 20 Mbps upload speeds within our region.

The Equal Access Santa Cruz project demonstrates the viability of a business model for building and operating high capacity, small scale broadband systems that serve isolated pockets of low income and disadvantaged households. This project will be a template for bringing equitable broadband service to similarly bypassed homes throughout Monterey, San Benito and Santa Cruz counties. For example, workforce housing, particularly for agricultural laborers, is scattered throughout our region, often in isolated rural locations where 21st century connectivity is unavailable.

The CCBC is committed to developing the infrastructure necessary to delivering modern broadband service to everyone in our region. Our immediate objective is fulfilment of our statutory responsibility to develop low speed access services for 98% of our region, but our ultimate goal is to develop high speed service at the 100 Mbps download and 20 Mbps upload levels identified as the minimum necessary for our region¹, for *everyone* in our region. The Equal Access Santa Cruz project, as authorised by Draft Resolution T-17674, is a proof of concept that will demonstrate how we can achieve this goal.

Conclusion

The CCBC thanks staff for its timely and professional review of the Equal Access Santa Cruz Project grant application, and for a well drafted resolution. We urge the Commission to adopt Resolution T-17674 in its current form.

Sincerely,

/s/ Stephen A. Blum

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¹ *Achieving Ubiquitous Broadband Coverage in the Monterey Bay Region*, Monterey Bay Economic Partnership and Central Coast Broadband Consortium, November 2018.