

June 8, 2020

VIA EMAIL

Robert Osborn
Director, Communications Division
Public Utilities Commission
505 Van Ness Avenue, Third Floor
San Francisco, CA 94102-3298
robert.osborn@cpuc.ca.gov

Re: Challenge of 101Netlink to Certain California Advanced Services Fund Infrastructure Grant Applications

Dear Mr. Osborn,

Pursuant to Section 281 of the California Public Utilities Code, 101Netlink (“101Netlink” or the “Company”) hereby submits this challenge to certain of the California Advanced Services Fund Infrastructure Grant Applications (“CASF Applications”) submitted to the Commission on May 4, 2020.

101Netlink is a fixed wireless internet service and VoIP provider operating in Mendocino, Humboldt, and Trinity counties. The company routinely files its Form 477 FCC Broadband Deployment Report as well as the PUC’s annual Broadband Data Request. Its service area comprises cities in Humboldt County as well as a large rural area spanning those three counties. In many areas, 101Netlink is the only fixed broadband operator available to residential and commercial customers. The towns it currently serves can be found on its website at <https://www.101Netlink.com/service-areas/>. Currently, 101Netlink provides internet services with minimum speeds of 6.5 Mbps download/1.5 Mbps upload up to 25 Mbps download/5 Mbps upload in these areas.

CASF money may only be awarded for service deployment to unserved areas, currently defined as those receiving broadband speeds of less than 6 Mbps download/1 Mbps upload from a wireline or wireless facilities-based provider. Section 281(f)(4)(A)(ii) prohibits CASF funding upon proof by a provider of broadband deployment to a census block. Moreover, Section 281(f)(5) requires grant applicants to show that their requested projects serve only unserved households.

101Netlink has identified overlap of its current service areas in the following CASF applications:

Hunter Communications Inc. (U-7281-C): Mendocino County Project 1, specifically Laytonville.

Frontier California Inc. (U-1002-C): Garberville/Alderpoint FTTP Project, specifically Alderpoint, and Garberville.

Frontier California Inc. (U-1002-C): Piercy/Leggett/Laytonville FTTP Project, specifically Piercy, Leggett, and Laytonville.

Frontier Communications of California Inc. (U-1024-C): Mad River FTTP, specifically Bridgeville, Ruth and Mad River.

Below is a list of the census blocks that are contained in the above projects for which 101Netlink currently provides fixed wireless and VoIP services:

60230115003131, 60230116001217, 60230116001222, 60230116001229,
60230116001257, 60230116002070, 60230116002071, 60230115003141,
60450102001007, 60450102001018, 60450102001058, 60450102001078,
60450102001080, 60450102001099, 60450102001101, 60450102001157,
60450102001171, 60450102002039, 60450102002041, 60450102002043,
60450102002091, 60450102002099, 60450102002124, 60450102002161,
60450102002177, 60450102002202, 60450102002203, 60450102002222,
60450102002225, 60450102002251, 60450102002270, 60450102002353,
60450102002394, 60450102004018, 60450102004120, 60450102004156,
60450102005002, 60450102005005, 60450102005006, 60450102005007,
60450102005008, 60450102005010, 60450102005011, 60450102005013,
60450102005018, 60450102005025, 60450102005037, 60450102005039,
60450102005060, 60230109021234, 60230109021240, 60230109021243,
60230109021227, 61050004001067, 60230109021232, 60230109021233,
60230109021230, 61050004001069, 60230109021345, 60230109021241,
61050004001074, 60450102001054, 60450102001064, 60450102004116,
60450102004149, 60450102005034

While 101Netlink has been able to identify the above listed overlapping service areas, 101Netlink asserts that this may not be an exhaustive list. There may be additional service areas contained in other CASF project applications that 101Netlink was not able to identify. 101Netlink urges the Commission to decline funding for all the census blocks currently being served by 101Netlink.

Additional information will be provided confidentially under separate cover. If you have any questions, please contact the undersigned counsel at kris@lokt.net or 202.681.1850. Thank you for your attention to this matter.

Sincerely,



Kristopher E. Twomey
Counsel to 101Netlink

cc: CASF Distribution List