

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

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

R.12-10-012

**COMMENTS OF THE CITY AND COUNTY OF SAN FRANCISCO
ON THE ASSIGNED COMMISSIONER’S RULING**

The City and County of San Francisco (“San Francisco”) submits these comments on Question 1 in the Assigned Commissioner Ruling Requesting Comments on Broadband Infrastructure Rules and Application Windows (“ACR”).¹ In Question 1, the California Public Utilities Commission (“Commission”) seeks comments on actions it could take with regard to enhancing use of the California Advanced Services Fund (“CASF”) in response to the COVID-19 crisis facing the State of California.

San Francisco agrees that the Commission should take action now to enable CASF funds to be used to better support connectivity in public housing projects. In these difficult times, in which the entire State of California has been ordered to shelter-in-place, the Commission must ensure that our most vulnerable citizens continue to be able to communicate with their families,

¹ In email ruling issued on March 26, 2020, Administrative Law Judge Brian Stevens extended the deadline for filing these opening comments to and through April 9, 2019.

listen to their classes, work from home, and have access to medical care and other necessary services.

San Francisco generally agrees with all of the ACR's suggestions, including awarding grants on a rolling basis, increasing the amount of up-front funding to improve the ability of grantees to increase broadband adoption—particularly in a manner that would be consistent with social distancing and stay-at-home directives—and expeditiously making funding available for hotspots. While the COVID-19 crisis has demonstrated the need to accelerate broadband adoption, funding should focus on programs that do not require groups to congregate or share resources. The Commission should allow for the distribution of equipment prior to training, so that recipients can complete training on their own on a personal device.

The Commission also needs to find a quick way to improve connectivity to public housing residents that don't have it—either because it is unavailable or they can't afford it—and improve the quality of the broadband services available to public housing residents where the existing free or affordable service is poor. This can be readily accomplished by broader distribution of Wi-Fi hotspots and making funding available for LTE-enabled tablets or smartphones that can be used as Wi-Fi hotspots.

Finally, the Commission should consider raising the grant threshold for "expedited review," which is currently for applications seeking grants of not more than \$75,000. Where expedited review is available, approval is granted by Commission staff, rather than the Commission. Increasing this threshold will allow grantees to more quickly develop large scale projects.

San Francisco appreciates the opportunity to provide comments on the issues raised in the ACR.

Dated: April 9, 2020

Respectfully submitted,
DENNIS J. HERRERA
City Attorney
THERESA L. MUELLER
Chief Energy and Telecommunications Deputy
WILLIAM K. SANDERS
Deputy City Attorney

By: *William K. Sanders*

Attorneys for
CITY AND COUNTY OF SAN FRANCISCO
City Hall, Room 234
1 Dr. Carlton B. Goodlett Place
San Francisco, California 94102-4682
Telephone: (415) 554-6771
Email: william.sanders@sfcityatty.org