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Sacramento, CA 95814

**SENT VIA ELECTRONIC MAIL**

June 8, 2020

Robert Osborn  
Director - Communications Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Challenge to Digital Path Lassen/Plumas CASF Application**

Dear Mr. Osborn:

Citizens Telecommunications Company of California Inc. d/b/a Frontier Communications of California (U-1024-C) (Frontier), pursuant to Section 281(b)(2) of the Public Utilities Code, hereby submits to the California Public Utilities Commission (CPUC) a challenge to the pending application of Digital Path for an infrastructure grant of \$865,500 from the California Advanced Services Fund (CASF) for the Lassen/Plumas Project.

The Lassen/Plumas Project Summary proposes to serve a census block that is already served by Frontier with service at or above the required speed of 6/1 Mbps. Unfortunately, the CPUC's California Interactive Broadband Map (Broadband Map) only reflects deployment data as of December 31, 2018, and thus, does not provide applicants with the most up-to-date deployment information to assess areas that are eligible for a CASF grant. By no fault of Digital Path, the Broadband Map did not reflect the most current status of service, and thus, Frontier must challenge this application to avoid an overbuild and also to be a good steward of precious state funds – especially in a year of unprecedented application submissions.

Additionally, Frontier must challenge three of the Lassen/Plumas census blocks as they overlap with Frontier's Northeast Phase I CASF application, which was approved and accepted by Frontier in February of 2020. Section 5.4 of the Appendix 1 Broadband Infrastructure Account Requirements, Guidelines and Application Materials states that:

“Previous CASF Areas In areas where the Commission has already awarded a CASF grant, new CASF grant funding for broadband projects in the same area will be available only after three years from the start of broadband service of the first CASF-funded project in order to ensure that existing grantee(s) are able to realize returns on their investment.”

These census blocks will be built to within the required timeframe of the rules set forth in D.18-12-018 and will receive speeds at or above 10/1 Mbps.

To provide more detail in support of this challenge, Frontier hereby provides to the Commission the confidential attachments pursuant to D.18-12-018:

- The geographic location of all households that are served. This information shall be provided in a plain-text, comma-separated values (CSV) file, that contains geo-located street address information, including latitude and longitude coordinates.
- Customer billing from one subscriber in each census block challenged indicating that the customer received served speeds at least one day prior to the application filing.
- An attestation that the households identified in (a) are offered service and have the capability to receive minimum speeds of 6 Mbps download and 1 Mbps upload.

Census Blocks Challenged<sup>1</sup>:

60350403021027*	60350403022006	60630005023188
60630005023178	60630005023186	60350402002055
60350402002057*	60350402002038	60350402002035
60350402002075*	60630005023176	60350402002037
60630005011107*	60350402002063*	60350403021029*
60350402002081*	60350403023040	60630005023210*
60630005022031	60350402002065*	60630005012056
60350402002082	60350402002060*	60350402002066
60630005012021*	60350402002004*	60630005023214
60350402002025	60350402002029	60350402002050
60630005022025*	60350402002056	60350403022008
60630005023209*	60350402002024*	60350402002076*
60350402002031	60350402002085*	60630005023181
60350402002030	60350402002034	60350402002072

CASF Census Blocks Challenged (as a result of Frontier’s award for the Northeast Project: Phase I, Resolution T-17671, dated 12/20/2019):

60350404001068  
 60350404001131  
 60350404001057

Thank you for your consideration of this challenge, and please contact me with any questions at 916-683-7989 or [amy.warshauer@ftr.com](mailto:amy.warshauer@ftr.com).

Respectfully submitted,



Amy Warshauer  
 Manager, Government and External Affairs

<sup>1</sup> “\*” Represents a Census Block where Frontier service is available but no customers are currently subscribed.