



1201 K Street, Ste 1980  
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 Plumas Sierra Southern Lassen 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 Plumas Sierra for an infrastructure grant of \$13,630,662 from the California Advanced Services Fund (CASF) for the Southern Lassen Project.

The Southern Lassen 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 Plumas Sierra, 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 two of the Southern Lassen 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>:

60350406003095	60350403023104	60350403042027
60350403023090	60350403023018	60350403023107
60350403031029	60350406003042	60350403021031*
60350403023007	60350405003049	60350403042044*
60350403031040	60350403023024	60350403023032
60350403023029	60350403031067*	60350405001007
60350403023025	60350405003038	60350406003100
60350406003097	60350405003041	
60350403023089	60350403022045	

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

60350406001276  
60350404001058

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.