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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 Race Communications Gigafy Williams 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 Race Communications for an infrastructure grant of \$6,758,805 from the California Advanced Services Fund (CASF) for the Gigafy Williams Project.

The Gigafy Williams Project Summary proposes to serve census blocks that are 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 Race Communications, 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.

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.

Frontier attests that service is available for the following census blocks but, at this time, no bills with active customers are available.

60110003002040
60110003002026
60110003003004
60110003004078

60110003004042
60110003004135
60110003002035
60110003002012

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

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'AW', written in a cursive style.

Amy Warshauer
Manager, Government and External Affairs