



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 WiConduit Sonoma CASF Application**

Dear Mr. Osborn:

Frontier Communications Inc. (U-1002-C) (Frontier), pursuant to Section 281(b)(2) of the Public Utilities Code, hereby submits to the California Public Utilities Commission (Commission) a challenge to the pending application of WiConduit for an infrastructure grant of \$81,886,094.67 from the California Advanced Services Fund (CASF) for the Sonoma Project.

The Sonoma Project Summary proposes to serve census blocks that reside within a Connect America Fund (CAF II) area before July 1, 2020, which is explicitly prohibited in Section 281(f)(5)(c) of the Public Utilities Code:

“Except as provided in clause (ii), until July 1, 2020, the project is not located in a census block where an existing facility-based broadband provider has accepted federal funds for broadband deployment from Phase II of the Connect America Fund, unless the existing facility-based broadband provider has notified the commission before July 1, 2020, that it has completed its Connect America Fund deployment in the census block.”

Thus, WiConduit’s broadband infrastructure grant application is not eligible as it resides in a CAF II region that was not forfeited by Frontier, and the proposal was submitted before July 1, 2020. Although this is sufficient evidence for this challenge to be upheld, Frontier would like to note that the challenged census blocks are already in service at speeds at or above 10/1 Mbps, with the exception of three. The three census blocks that are not yet in service are currently being constructed and will be completed in 2020. This build will expand broadband service to residential households within the specified census blocks at or above the CASF served speed requirement of at least 10/1 Mbps. It is for these reasons that Frontier must challenge this application.

D.18-12-018 requires that providers submit more detail in support of a challenge, including confidential information regarding:

- 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.

Because these census blocks are ineligible for CASF funding, Frontier is not required to provide address and billing information in this challenge. The completed CAF II locations will be reported in Frontier's 2020 year-end reporting to the FCC, in which the CPUC receives a copy.

Below are the CAF II census blocks from the grant that should be disqualified:

60971543031033	60971543031088	60971543031069
60971543031087	60971543031091	60971543031064
60971543031076	60971543031071	60971543031060
60971543031039	60971543031089	60971543031072
60971543031050	60971543031026	60971543031074

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