

**BEFORE THE
CALIFORNIA PUBLIC UTILITIES COMMISSION**

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

Rulemaking No. 12-10-012
(Filed October 25, 2012)

**OPENING COMMENTS OF CALIFORNIA INTERNET, L.P. (U-7326-C) DBA
GEOLINKS ON QUESTION 1 OF THE ASSIGNED COMMISSIONER RULING
REQUESTING COMMENTS ON BROADBAND INFRASTRUCTURE RULES AND
APPLICATION WINDOWS**

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I. INTRODUCTION

California Internet, L.P. (U-7326-C) dba GeoLinks (“GeoLinks” or the “Company”) respectfully submits these opening comments on Question 1 of the Administrative Law Judge’s Ruling Requesting Comments on Broadband Infrastructure Rules and Application Windows released on March 26, 2020 (“Ruling”).

GeoLinks was the largest construction grant winner for California K-12 schools and libraries in 2016 and 2017, providing highspeed broadband to rural school districts and surrounding communities throughout the state that previously had not had access to any high-speed broadband service. In addition, the Company was recently named an awardee in the Connect America Fund Phase II (“CAF II”) auction for several areas in California where, absent subsidy funding, “broadband expansion and ongoing service would not be economically feasible.”¹ The Company hopes to leverage its expertise in connecting unserved areas of the state to apply for California Advanced Services Fund (“CASF”) funding.

¹ FCC Press Release, *Connect America Fund Auction to Expand Broadband to Over 700,000 Rural Homes and Business: Auction Allocates \$1.488 Billion to Close the Digital Divide*, released August 28, 2018 (“CAF Press Release”), at 1.

II. DISCUSSION

A. Question 1 - Actions to Consider in Response to COVID-19

In the Ruling, the Commission seeks parties' input on what the Commission can and should do in response to COVID-19 with respect to CASF. GeoLinks offers the below suggestions for the Commission's consideration.

i. The Commission Should Begin Awarding Adoption Grants and Infrastructure Grants on a Rolling Basis

In the Ruling, the Commission asks if, in response to COVID-19, it should "begin awarding Adoption Grants on a rolling basis."² GeoLinks believes that in order to facilitate rapid adoption and deployment efforts in California the Commission should award *all* grants on a rolling basis, not just Adoption Grants. The Company asserts that a rolling basis for all grant funds is necessary to ensure that the CASF program can adapt to meet changing needs within the state of California on a more rapid basis.

It is very clear, now more than ever, that areas without broadband are at a severe disadvantage. With schools closed and the majority of the workforce at home, unconnected communities lack the basic broadband access needed to ensure continuing education, remote work, or, as is the case for many Californians, the ability to apply for unemployment or seek new employment. In some areas, this may be an adoption issue. In others, an access issue. Regardless of the specific reasons, the fact remains that unconnected Californians need access now, not after the next application window.

Because connectivity is needed now more than ever, GeoLinks urges the Commission to allow for applications on a rolling basis for all CASF grant programs, not just its Adoption account. As the COVID-19 situation continues to unfold, and as we strive to recover from it in the future, communities, consortia, service providers, etc. will start to identify new needs for targeted broadband connectivity and adoption. Allowing applications on a rolling basis would allow for maximum flexibility to ensure that CASF funds are distributed where needed on a more immediate basis without the constraints of a "due date" that may not reflect when needs are identified. We should not make project applicants wait until July for Adoption grant applications or another six months if needs are identified after the July deadline. And we should not make

² Ruling at 4.

would-be Infrastructure grant applicants wait until next April to apply if the ability to provide connectivity to an area is realized after the May 4th application deadline. To ensure that CASF funds are distributed to meet the needs of Californians as they arise, GeoLinks urges the Commission to allow applications on a rolling basis for all CASF grant funds.

ii. The Commission Should Increase the Amount of Up-Front Funding for all CASF Grant Programs

In the Ruling, the Commission asks whether in response to COVID-19 it should “increase the amount of up-front funding for Adoption grantees to improve the ability of grantees to increase broadband adoption.”³ Similar to the discussion above, GeoLinks believes that the Commission should increase the amount of up-front funding for all CASF grant programs, including both Adoption Grants and Infrastructure Grants. GeoLinks believes this is necessary to promote rapid execution of grant-funded programs targeted at helping Californians during the COVID-19 pandemic.

As explained above, broadband adoption efforts and additional connectivity are needed ASAP. The reality is, however, these efforts come with up-front expenses that can hinder a grant applicant’s ability to get started immediately or ramp up quickly if they have to wait for reimbursement. In the case of Adoption Grants, these costs may include computers or other equipment needed to access broadband, space for broadband adoption training, hiring personnel, etc. In the case of Infrastructure Grants, this could include costs associated with equipment, permitting, CEQA review, new personnel, etc. In either case, the ability to obtain adequate up-front funding from CASF (vs. reimbursement) will ensure more rapid ramp up of any approved Adoption or Infrastructure Grant program – and faster realization of the benefits.

For these reasons, GeoLinks urges the Commission to increase the amount of up-front funding available for all CASF Grant programs, not just the Adoption Grant program. Specifically, GeoLinks believes that up to 50% of the grant amount should be available to award recipients subject to certain reporting requirements regarding actual costs incurred. The remaining 50% of the grant funding can continue to be distributed on a reimbursement basis, as needed.

³ *Id.*

iii. The Commission Should Expediently Make Wi-Fi Hotspots Available Through the Adoption Account and Should Fast Track Applications to Connect Community Anchor Institutions

In the Ruling, the Commission asks whether it should “expeditiously make hotspots available through the Adoption account.”⁴ While the Commission asks this question in the context of the COVID-19 pandemic, GeoLinks views this as a reasonable and important use of Adoption account funds in any circumstance given the realities of broadband availability and adoption throughout the state. However, now more than ever, these connectivity options are crucial.

As noted above, these unprecedented times have led to state-wide school closures and mandates for employees to work from home (if they are able to do so). This means the need for more home broadband connections in order to facilitate online learning and remote working. However, many California households are without a home broadband connection due to either a lack of access, lack of education regarding broadband use, or a lack of financial ability to pay for a home connection. While many of these homes have access to broadband via a cell phone, mobile devices can have significant limitations.

It is no secret that when a home broadband connection is not available people will utilize public wi-fi options available through public libraries, schools, other community organizations, or local businesses. However, during these trying times when so many business and community anchor institutions are temporarily closed, these otherwise available connectivity points cease to be an option. Were additional wi-fi hotspots made available that could amplify the networks that these citizens rely on, service could be expanded to reach nearby homes or at a minimum to the parking lot of the facility to allow for connectivity from the safety of a personal vehicle. While certainly not a perfect solution, some connectivity, especially now, is far better than none.

GeoLinks urges the Commission make wi-fi hotspots available via the Adoption account as soon as possible and asserts that Adoption account applicants should be able to use these wi-fi hotspots in conjunction with existing internet connections or on new connections and that placement should not be limited to community anchor institutions if more advantageous locations (such as small businesses, government buildings, communications towers, etc.) are

⁴ *Id.*

available and could be utilized more efficiently/ to reach a broader population. The Commission should create a simplified application process to apply for funding for obtaining and connecting these wi-fi hotspots and Adoption grant applicants should be allowed leeway to work with service providers, private entities, etc. to make wi-fi more broadly available.

In addition, the Commission should create a simplified application process to fast track high-speed connections to unserved community anchor institutions that will offer public wi-fi under either the Adoption grant or Infrastructure grant. This will ensure that, at a minimum, underserved communities will have some way to access a highspeed broadband connection.

III. CONCLUSION

Based on the foregoing, in response to the current COVID-19 crisis, GeoLinks urges the Commission to make all CASF grant applications due on a rolling basis to allow applicants to submit applications as needs are identified. In addition, GeoLinks urges the Commission to allow for increased upfront costs for all CASF grants to ensure rapid implementation of any Adoption or Infrastructure project. Lastly, GeoLinks asserts that the Commission should allow for expeditious funding of wi-fi hotspots through the Adoption grant program and create a simplified application process to fund connections to unserved community anchor institutions that will offer public wi-fi. GeoLinks believes that these steps are critical to meeting the needs of Californians during the COVID-19 pandemic and after.

Respectfully submitted,

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