

June 8, 2020

VIA EMAIL

Robert Osborn
Director, Communications Division
Public Utilities Commission
505 Van Ness Avenue, Third Floor
San Francisco, CA 94102-3298
robert.osborn@cpuc.ca.gov

Re: Challenge of North Coast Internet to Certain California Advanced Services Fund Infrastructure Grant Applications

Dear Mr. Osborn,

Pursuant to Section 281 of the California Public Utilities Code, North Coast Networks dba North Coast Internet (“North Coast Internet” or the “Company”) hereby submits this challenge to certain of the California Advanced Services Fund Infrastructure Grant Applications (“CASF Applications”) submitted to the Commission on May 4, 2020.

North Coast Internet is a fixed wireless internet service provider operating in Mendocino and Lake Counties. The company routinely files its Form 477 FCC Broadband Deployment Report as well as the PUC’s annual Broadband Data Request. In many areas, North Coast Internet is the only fixed broadband operator available to residential and commercial customers. The towns it currently serves can be found on its website at <https://www.northcoastnet.com/coverage-area>. The Company provides internet service plans with speeds up to 25 Mbps download/10 Mbps upload for residential customers in these areas and up to 50 Mbps download for businesses.

CASF money may only be awarded for service deployment to unserved areas, currently defined as those receiving broadband speeds of less than 6 Mbps download/1 Mbps upload from a wireline or wireless facilities-based provider. Section 281(f)(4)(A)(ii) prohibits CASF funding upon proof by a provider of broadband deployment to a census block. Moreover, Section 281(f)(5) requires grant applicants to show that their requested projects serve only unserved households.

North Coast Internet has identified overlap of its current service areas in the following CASF applications:

Hunter Communications Inc. (U-7281-C): Mendocino County Project 1

Digital Path- Lake County

Digital Path- Mendocino County

Attached to this letter as a confidential exhibit are two spreadsheets. One contains a list of current coverage area by census block, the other contains a list of census blocks for which coverage could be extended within 180 days.

While North Coast Internet has been able to identify the above listed overlapping service areas, the Company asserts that this may not be an exhaustive list. There may be additional service areas contained in other CASF project applications that North Coast Internet was not able to identify. North Coast Internet urges the Commission to decline funding for all the census blocks currently being served by North Coast Internet.

Additional information will be provided confidentially under separate cover. If you have any questions, please contact the undersigned counsel at kris@lokt.net or 202.681.1850. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Twomey', is written over a thin horizontal line.

Kristopher E. Twomey
Counsel to North Coast Internet

cc: CASF Distribution List