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2	BEFORE THE PUBLIC UTILITIES COMMISSION			
3	OF THE STATE OF CALIFORNIA			
4	OF THE STATE OF CALIFORNIA			
5	Order Instituting Rulemaking to Consider	R. 12-1	10 012	
6	Modifications to the California Advanced Services Fund.		October 25, 2012)	
7	Services Fund.			
8				
9	COMMENTS OF			
10	CALAVERAS TELEPHONE COMPANY (U 1004 C) CAL-ORE TELEPHONE CO. (U 1006 C) DUCOR TELEPHONE COMPANY (U 1007 C) FORESTHILL TELEPHONE CO. (U 1009 C) HAPPY VALLEY TELEPHONE COMPANY (U 1010 C) HORNITOS TELEPHONE COMPANY (U 1011 C) KERMAN TELEPHONE CO. (U 1012 C) PINNACLES TELEPHONE CO. (U 1013 C) THE PONDEROSA TELEPHONE CO. (U 1014 C) SIERRA TELEPHONE COMPANY, INC. (U 1016 C) THE SISKIYOU TELEPHONE COMPANY (U 1017 C) VOLCANO TELEPHONE COMPANY (U 1019 C) WINTERHAVEN TELEPHONE COMPANY (U 1021 C) (the "SMALL LECS") ON ASSIGNED COMMISSIONER'S RULING REQUESTING COMMENTS ON BROADBAND INFRASTRUCTURE RULES AND APPLICATION WINDOWS			
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COOPER, WHITE & COOPER LLP ATTORNEYS AT LAW 201 CALIFORNIA STREET SAN FRANCISCO, CA 94111-5002 Pursuant to Assigned Commissioner Guzman Aceves's March 26, 2020 Ruling ("Ruling"),¹ the Commission seeks comment on how the California Advanced Services Fund ("CASF") program can be optimized to benefit the public during the COVID-19 crisis.² In particular, the Question 1 of the Ruling asks whether the Commission should (a) begin awarding adoption grants on a rolling basis and/or (b) make changes to the tasks assigned to staff. *Ruling*, at 4. The Small LECs³ hereby address this first question of the Ruling and appreciate the Commission's attention to these important matters during this difficult time.

As the Ruling suggests, it would be appropriate to evaluate CASF adoption grants on a rolling basis, but the same flexibility should be applied to the infrastructure grant aspects of the CASF program. Currently, the deadline for infrastructure grant proposals is May 4, 2020, but that date is rapidly approaching, and the health crisis persists. Rather than imposing a rigid deadline and foreclosing projects thereafter, the public interest will be better served by keeping the application window open beyond May 4th. This will allow providers to assess areas of need in light of evolving information and react to changing broadband usage patterns brought on by the statewide "shelter-in-place" order. Providing a "rolling" application process would also provide potential applicants with the opportunity to consider synergies with potential adoption programs and develop creative ideas over a longer time horizon. If the CASF program is beholden to a specific deadline, some beneficial projects may be foreclosed just because of the time constraints.

By adopting a flexible approach to accepting infrastructure applications, while maintaining the same subsequent deadline period for publication, challenges, and approvals, the Commission can act with the fluidity needed, during, and in the aftermath of, the COVID-19 public health crisis

¹ Pursuant to the e-mail ruling of Administrative Law Judge ("ALJ") Stevens issued on March 26, 2020, the deadline for comments on Question 1 of the Ruling was established as April 9, 2020.

² The Ruling contains twenty-five discrete questions, but the Ruling allows for comments to all other questions to be filed and served no later than April 15, 2020. *Ruling*, at 16. The Small LECs reserve the right to submit further comments on those separate issues at that time.

³ The Small LECs are the following small, rural telephone companies: Calaveras Telephone Company (U 1004 C), Cal-Ore Telephone Co. (U 1006 C), Ducor Telephone Company (U 1007 C), Foresthill Telephone Co. (U 1009 C), Happy Valley Telephone Company (U 1010 C), Hornitos Telephone Company (U 1011 C), Kerman Telephone Co. (U 1012 C), Pinnacles Telephone Co. (U 1013 C), The Ponderosa Telephone Co. (U 1014 C), Sierra Telephone Company, Inc. (U 1016 C), The Siskiyou Telephone Company (U 1017 C), Volcano Telephone Company (U 1019 C), and Winterhaven Telephone Company (U 1021 C) (the "Small LECs").

1	without prejudicing any interested stakeholders. This action would also obviate the need for the			
2	Commission to evaluate whether it would need to offer a second infrastructure application round.			
3	Given the inevitable long-term economic hardships that many Californians will face, and the shifting			
4	parameters that are still developing in response to containment measures, the need for, and reliance			
5	on, advanced telecommunications infrastructure is especially heightened. The Commission should			
6	have the discretion to evaluate infrastructure applications throughout the year to maximize potential			
7	public benefits during this time of crisis.			
8	The Small LECs continue to support the CASF program and appreciate the opportunity to			
9	address the issues in the Ruling.			
10	Respectfully submitted this April 9th, 2020 at San Francisco, California.			
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