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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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

R. 12-10-012
(Filed October 25, 2012)

COMMENTS OF

- 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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April 9, 2020

Attorneys for the Small LECs

1 Pursuant to Assigned Commissioner Guzman Aceves’s March 26, 2020 Ruling (“Ruling”),¹
2 the Commission seeks comment on how the California Advanced Services Fund (“CASF”) program
3 can be optimized to benefit the public during the COVID-19 crisis.² In particular, the Question 1 of
4 the Ruling asks whether the Commission should (a) begin awarding adoption grants on a rolling
5 basis and/or (b) make changes to the tasks assigned to staff. *Ruling*, at 4. The Small LECs³ hereby
6 address this first question of the Ruling and appreciate the Commission’s attention to these
7 important matters during this difficult time.

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

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

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

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

28 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”).

