

**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  
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**COMMENTS OF ACCESS HUMBOLDT (AH)  
ON THE ORDER INSTITUTING RULEMAKING**

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December 3, 2012

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**COMMENTS OF ACCESS HUMBOLDT (AH)  
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**ACCESS HUMBOLDT SUPPORTS THE COMMISSION PROPOSAL TO  
PERMIT NON-TELEPHONE CORPORATIONS TO BE ELIGIBLE TO APPLY  
FOR CASF FUNDS**

AH supports State policies and CPUC rules that would permit organizations that are not CPCN or WIR holders to be eligible for CASF funding. AH strongly believes that municipalities, local community-based non-profits, American Indian Tribes, public-private partnerships, and other local entities should be eligible for such funding.

Private telephone corporations and other telecommunications utilities are not the only entities capable of providing broadband services to meet local needs and interests. In fact, locally based and locally owned providers such as community-based organizations, local governmental entities, public-private partnerships, small businesses and other local entities can be more efficient providers of broadband than profit seeking telephone corporations under absentee ownership.

Local jurisdictions, such as counties, cities, community service districts, library and school districts, health districts, and fire districts all manage public assets such as rights of way and public facilities that can be leveraged to advance the deployment and adoption of broadband to provide services for public safety, public health, public education, public works and public media.

Community-based and locally owned entities can provide open internet and other broadband transport services that are more accountable to the communities they serve with faster, more effective customer service, especially for the least served people and places that are the focus of the CASF funds.

Dated: December 3, 2012

Respectfully submitted:

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Sean McLaughlin  
Executive Director  
Access Humboldt