

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to

Consider Modifications to the California

Advanced Services Fund.

RULEMAKING 12-10-012

**COMMENTS OF VALLEY VISION ON RULEMAKING 12-10-012 FOR OIR TO
CONSIDER MODIFICATIONS TO THE CASE**

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Dated: November 30, 2012

Valley Vision, an independent nonprofit based in Sacramento, hereby submits its comments in response to the **Order Instituting Rulemaking 12-10-012 to Consider Modifications to the California Advanced Services Fund.**

These comments are to share feedback we have received regarding the Certificate of Public Convenience and Necessity (CPCN) and Wireless Identification Registration (WIR) requirements of the California Advanced Services Fund (CASF).

Through our outreach work as the host agency for the “Connected Capital Area” Broadband Consortium, we have heard from multiple stakeholders that to best meet the broadband needs in the rural areas, the most logical project applicant to achieve cost-effective deployment of broadband infrastructure may not have a CPCN or be a registered wireless carrier. As expressed in our comments during previous rulemaking, we believe the CASF requirements should allow for non-CPCN holders and non-registered wireless carriers to be eligible applicants in order to encourage a variety of applicants that can best lead consolidated and coordinated broadband projects within a region.

With the flexibility that comes with expanding the pool of eligible applicants, there will be significant improvements in the CPUC’s opportunity to reach the goal of 98% broadband deployment and 80% adoption for California by 2015 – goals acknowledged by the California Broadband Council (CBC), California Public Utilities Commission (CPUC), and California Emerging Technology Fund (CETF). It should be noted that the terrain and population

distribution of the remaining unserved and underserved households in California may best be served by wireless providers (mobile or fixed).

There is precedence for removal of the CPCN and WIR requirement. The CPUC permitted non-CPCN and non-WIR CASF applicants as a matching component to ARRA broadband infrastructure awards in 2009.

There were no applications from the Sacramento region for the October 1, 2012 CASF infrastructure grant and loan deadline, yet we have heard from multiple stakeholders there would be interest in submitting an application if the CPCN and WIR requirement is removed. The Sacramento region is intently focused on bringing investments to the region which will accelerate job creation and enhance economic development efforts. Broadband is an essential infrastructure to help with economic recovery efforts, especially in the rural and underserved regions in California.

Thank you in advance for your consideration of our comments.

Dated: November 30, 2012

Respectfully submitted,

VALLEY VISION

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