

**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

**COMMENTS OF THE UTILITY REFORM NETWORK (TURN)
ON THE PROPOSED DECISION OF COMMISSIONER PEEVEY**



January 27, 2014

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I. INTRODUCTION

The Utility Reform Network (TURN) hereby submits its Comments on the Proposed Decision (PD) of Commissioner Peevey.

II. TURN GENERALLY SUPPORTS THE PROPOSED DECISION

TURN generally supports the PD and appreciates the balanced approach the PD takes towards the issues associated with non-telephone entities being eligible to apply for California Advanced Services Funds (CASF). TURN urges a modification of the PD in one respect – requiring governmental applicants to provide a performance bond. TURN remains concerned that such a requirement may be a non-starter for such entities that may act as a disincentive to even applying for CASF monies. If the requirement remains, TURN respectfully requests that

the Commission consider instituting a process whereby an otherwise fully eligible governmental candidate can appeal for a waiver of the performance bond requirement. In this manner, if a governmental entity is unable to obtain a performance bond, they may still be able to be awarded a CASF grant and thereby provide broadband services to their citizens.

Dated: January 27, 2014

Respectfully submitted,

_____/s/_____
William R. Nusbaum
Managing Attorney
TURN