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**DELIVERED VIA E-MAIL**

October 11 2013

Ms. Ana Maria Johnson  
Communications Division  
California Public Utilities Commission  
505 Van Ness Avenue, 3<sup>rd</sup> Floor  
San Francisco, CA 94102

Re: Comments of Verizon California Inc. on Draft Resolution T-17421

Dear Ms. Ana Maria Johnson:

Verizon California Inc. (Verizon) provides these comments on Draft Resolution T-17421 regarding WillitsOnline' CASF application. Verizon previously noted in its March 11, 2013 email to staff that carriers would be submitting updated broadband data in July in response to the Data Requests submitted as part of NTIA's State Broadband Data and Development Grant Program. Verizon recommended that staff should consider reviewing the data submitted in July (that is, "Round 8" data) to ensure that proposed projects actually meet the CASF program requirements based on the most recent data. Verizon's intent was to assist Staff in ensuring public funds are expended for only meritorious and compliant projects.

To that end, Verizon recommends a fundamental change to the Draft Resolution, which should result in revisions to the project. The Commission should modify the Draft Resolution to show that there is wireless broadband in portions of the Westport project area at speeds in excess of 6 mbps download and 1.5 mbps upload. The Commission's Interactive Broadband Map (IBM) shows that portions of the project area is served with existing wireless broadband service at speeds above the 6/1.5 Mbps threshold. Inexplicably, the Draft Resolution relies on dated data when it could rely on the recent Round 8 broadband data, or the Spring 2013 speed test data, both of which "show speeds greater than 6Mbps download and 1.5Mbps upload"<sup>1</sup> in portions of Westport project area. For

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<sup>1</sup> Available at <http://www.broadbandmap.ca.gov/v2.1/>

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example, the IBM currently reports availability of Verizon Wireless broadband service in the area south of Westport, but within the project area in excess of the 6/1.5 Mbps benchmark. Retaining areas of the project where wireless broadband exists at speeds in excess of the benchmark amounts to legal error—that is, does not comply with the requirements of the CASF program—and must be corrected.

The Draft Resolution should be revised accordingly.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'KR' followed by a horizontal line and a small flourish.

Kurt Rasmussen  
Vice President  
Government Relations

c: Service list attached to the Notice of Availability