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February 27, 2024

Attn: Honorable President Alice Bushings Reynolds
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Submitted Online Public Comment Portal: A2303002 & A2303003 – Public Comments

RE: Letter of Comment and Opposition to Pacific Bell Telephone Company d/b/a AT&T California amended application for targeted relief from its Carrier of Last Resort obligation and certain associated tariff obligations.

Dear President Reynolds and Honorable Commissioners,

I am writing to you on behalf of the Nevada County Board of Supervisors to express our strong opposition to Pacific Bell Telephone Company d/b/a AT&T's applications requesting the release of Carrier of Last Resort (COLR) and Eligible Telecommunications Carrier (ETC) designations, (A. 23-03-002; and A. 23-03-003) and encourage the California Public Utilities Commission to deny its approval.

As the current Carrier of Last Resort (COLR) in Nevada County, AT&T is required to provide "Plain Old Telephone Services" (referred to as "POTS") to all businesses and residents with minimum requirements that do not extend to new technologies such as cell or Voice Over Internet Protocol (VoIP). Per the census defined places (CDP) listed areas in AT&T's application, the following communities and surrounding areas would lose service: Alta Sierra, Floriston, Grass Valley, Kingvale, Lake Wildwood, Lake of the Pines, Nevada City, North San Juan, Penn Valley, Rough and Ready, Soda Springs, and Town of Truckee.

Most of the County, excluding United States Forest Service (USFS) and other public lands, would be at risk of little or no service leaving thousands without any alternative to POTS telecommunication. Currently, AT&T is outlining to the public that 7% of households served in California currently use antiquated copper-based technology and that their efforts is a request simply to upgrade customers to modern services. And while we acknowledge the need and importance of updating POTS to newer technology, it should only be done as reliable and affordable technology is already in place to ensure no

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one is left behind, especially those most vulnerable and rural residents where POTS is the only reliable available option for emergency communication. Additionally, we know that data drawn from CPUC and FCC broadband maps used by AT&T as justification is inaccurate for our county and many others.

Claims that only 7% of households in California currently use antiquated copper-based technology is misleading, as rural areas like Nevada County are highly dependent on POTS for basic communication where topography and economies of scale that prohibit profitable return on investment (ROI) for Internet Service Providers (ISPs) have resulted in little or no broadband service for VoIP or wireless technologies. In a recent Need for Speed Survey administered by Nevada County, we found that out of 4,400 respondents, the 757 AT&T customers receiving internet reported speeds of <10 Mbps. In addition, the office of the Board of Supervisors has received approximately 90 inquiries over the past several months from desperate residents urging the County to oppose AT&T applications as the POTS where it is their only lifeline of communication for emergencies, evacuations through the County's Code Red System telephone emergency public alert during disasters, and ability to access law enforcement services.

Much of Nevada County areas have been impacted or are at high risk by catastrophic wildfires. During emergencies, customers and first responders need reliable access. VoIP phones are reliant upon internet connection which during power outages or Public Safety Power Shutoffs (PSPS) events, makes reliable communication impossible – placing community lives at risk, as well as first responders. Should the CPUC approve AT&T's withdrawal as the COLR and ETC, communities could see telecommunication networks going black within 6 months. This would be a devastating blow to our community and greatly complicate our ability to respond during emergencies and disasters.

It is critical that Nevada County residents and communities retain, at their option, resilience communication services such as POTS. COLR and ETC relief should not be granted without securing widespread alternatives with uniform technology neutral minimum service quality standards. Therefore, we strongly urge the CPUC to deny a AT&T's applications requesting the release of COLR and ETC designations.

Sincerely,

Hardy Bullock, Chair
Board of Supervisors