



PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA

ALICE BUSCHING REYNOLDS
PRESIDENT

TEL: (415) 703-2782
WWW.CPUC.CA.GOV

March 15, 2022

Russ Nichols, Acting Director and State Chief Information Officer
California Department of Technology

RE: Middle Mile Locations Analysis and Data Report Website

Dear Director Nichols,

This letter is to inform you that the CPUC has completed a comprehensive analysis of Middle Mile locations, as specified in Government Code section 11549.54. The CPUC is providing the analysis and data report to be publicly posted by the California Department of Technology, and it is available on the following website: <https://middle-mile-broadband-initiative.cdt.ca.gov/pages/data-and-analysis>. This updated, comprehensive analysis builds upon the prior analysis published in December 2021.

This March 2022 analysis reflects locations "that will enable last-mile service connections and are in communities where there is no known middle-mile infrastructure that is open access, with sufficient capacity, and at affordable rates," as required by SB 156. This update also illustrates the statutory prioritizations outlined in Government Code sections 11549.54(b)-(c) and the results of public comment outlined in Government Code Section 11549.54(f).

Specifically, the update implements the requirements in Government Code Section 11549.54(b):

1. "identify statewide open-access middle-mile broadband network locations that will enable last-mile service connections" *and*
2. "in communities where there is no known middle-mile infrastructure that is open access" *and*
3. "with sufficient capacity" *and*
4. "at affordable rates"

As well as the prioritizations in Government Code Sections 11549.54(c)-(d):

1. "areas that can be built expeditiously"
2. "areas with no known middle-mile network access"
3. "regions underserved by middle-mile networks"
4. "regions without sufficient capacity to meet future middle-mile needs"
5. "locations that enable last-mile connections to residences unserved by 25 mbps downstream and 3 mbps upstream"

6. "may also include entities that lack sufficient high-bandwidth connections, including, but not limited to" anchor institutions, fairgrounds, and Tribal lands.

Additionally, the analysis includes input from public comments pursuant to Government Code Section 11549.54(f):

The commission shall solicit and receive public comments within 90 days of the effective date of this section with respect to both of the following:

- A) The current locations, routes, availability, technical performance characteristics, and other aspects of commercial sources of supply of middle-mile broadband network services.
- B) The locations, routes, technical performance characteristics, network design, regeneration points, interconnection points and tie-ins, and other design, technical, business, and operational considerations that would increase the attractiveness and usefulness of the statewide open-access middle-mile broadband network for commercial internet service providers.

As specified in statute, the CPUC solicited and received public comment from August 6, 2021 to October 15, 2021. Additionally, two rulings requested formal party comment on network locations and characteristics, and the Commission solicited and continues to receive informal public comments and letters.

In sum, this updated analysis provides the foundation for the implementation of final middle mile locations, the identification of priority routes, and helps to ensure our agencies meet the statutory requirements of SB 156.

We are grateful for the continued partnership with the California Department of Technology and look forward to our work together to achieve Broadband for All.

Sincerely,

A handwritten signature in blue ink that reads "Alice Busching Reynolds". The signature is fluid and cursive, with a long horizontal stroke at the end.

Alice Busching Reynolds, President
California Public Utilities Commission