

DRAFT

High Level Public Comments Summary

On the CPUC's Ruling Issued August 6, 2021

Statewide Open-Access Middle Mile

October 13, 2021



California Public
Utilities Commission

Background and Timeline

Date	Action
July 20, 2021	Governor Approves SB 156; Requires the CPUC to Solicit Public Comments within 90 Days on: <i>(A) The current locations, routes, availability, technical performance characteristics, and other aspects of commercial sources of supply of middle-mile broadband network services.</i> <i>(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 (Section 11549.54. (f)(1))</i>
August 6, 2021	CPUC Issues Ruling to Solicit Feedback in Rulemaking (R.) 20-09-001: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M397/K312/397312171.PDF
September 7, 2021	Comments Filed
September 21, 2021	Reply Comments Filed
September 9, 2021	CPUC Issues Ruling to Solicit Additional Feedback in Rulemaking (R.) 20-09-001: https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M406/K286/406286655.PDF
October 1, 2021	Comments Filed (analysis in progress for next CPUC summary)
October 15, 2021	Reply Comments Filed (analysis in progress for next CPUC summary)

Many Ways to Comment

- **Informal Public Comment, at any time:**
 - On Middle Mile: <https://apps.cpuc.ca.gov/apex/f?p=401:65:0::NO>
 - Email to: StatewideBroadband@cpuc.ca.gov
 - In General: <https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/public-advisors-office/providing-public-comments-at-the-cpuc>
- **Formal Comments by Parties to the Proceeding:**
 - Learn how to become a party to a proceeding: <https://www.cpuc.ca.gov/pao/>
 - Proceeding Website:
https://apps.cpuc.ca.gov/apex/f?p=401:56:0::NO:RP,57,RIR:P5_PROCEEDING_SELECT:R2009001
 - Second ruling: Comments due Oct 1, replies Oct 15

Categories of Respondents

- Large Service Providers and Associations
- Competitive Carriers
- Investor-Owned Utilities
- Tribes
- Consumer Advocates
- Cities, Counties, Associations
- Local Broadband Advocates

Areas of Comments Requested

Comments requested on the following areas in the August 6, 2021 Ruling in R.20-09-001.

1. Identify existing middle mile infrastructure and areas with no known open-access middle mile.
2. Identify priority areas for open-access middle mile.
3. Assess affordability of middle mile – current rates, sources of information, etc.
4. Assess leasing options and value of leasing existing infrastructure.
5. Identify interconnection locations and exchange points.
6. Assess network route capacity for present and future needs.

Link to Ruling:

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M397/K312/397312171.PDF>

Formal Public Comments

	Organization	Links	Comment Highlights
1	Advanced Communications Law & Policy Institute at NY Law School	Replies	"The dangers of overbuilding are real and have caused some large-scale middle-mile projects to struggle or fail." (Replies, p. 5)
2	AT&T	Comments Replies	"As evident by reviewing the AT&T Fiber Map, there are only a few highway segments in AT&T's territory that are not covered by AT&T's fiber network. Given this robust fiber network and the other fiber networks in California, the vast majority of the state highways shown on the Anchor Highways Map should be eliminated as part of the state's buildout of a middlemile network." (Comments, p. 3)
3	CA Cable and Telecommunications	Comments Replies	"CCTA urges the Commission to provide the Office a staff report that will advance the legislative intent of ensuring that California's historic \$6 billion broadband investment follows the "worst first" strategy codified in SB 156 to prioritize deployment that enables last-mile connectivity for areas of the state that have no service or very slow service." (Comments, p. 10-11)
4	California Broadband Cooperative	Comments	"Our experience is that technology is disrupting the underlying economics of optical platforms, which must be flexibly built and intelligently managed." (Comments, p. 6)
5	California Community Foundation	Comments	"The lack of a competitive marketplace for broadband services spans the whole of Los Angeles County, including even the County's most affluent and white areas, as well as rural communities in the northern parts of the County." (Comments, p. 10)
6	California Emerging Technology Fund	Comments Replies	"At the end of the day, the metric that counts more than anything else is as follows: How many of the hardest-to-reach households that previously had no access to high-speed Internet service have been connected, and how many households were in high-poverty areas and Tribal Lands?" (Comments, p. 9)
7	California Public Advocates	Comments Replies	"The Commission should prioritize building sections of the middle mile network that are near Environmental and Social Justice (ESJ) communities, Tribal communities, and Tier 2 and 3 High Fire Threat District (HFTD) areas that are unserved or underserved by middle mile to ensure this network serves the needs of these communities first." (Comments, p. 2)

Formal Public Comments (continued)

	Organization	Links	Comment Highlights
8	California State Association of Counties	Comments	"CSAC urges the Commission to uphold these promises made to Californians. It can do that in three ways: by building infrastructure instead of leasing, by prioritizing unserved and underserved areas, and by working quickly." (Comments, p. 3)
9	CENIC	Comments Replies	"...at the forefront of this work should be on prioritizing the needs of California's most disenfranchised communities – including those in urban, rural, and tribal areas – and they should drive the state's initiative whether it be the last mile or middle mile efforts. Ultimately, the middle mile efforts connect to the last mile initiatives so, therefore, builds and acquisition of assets should coordinate in tandem." (Comments, p. 2)
10	Center for Accessible Technologies	Comments Replies	"Because the split between counties with high levels of service and those with low levels of service does not tend to cluster around the 50% mark, the Commission may want to consider counties with more than 35 percent of households lacking 100 Mbps download speeds as having insufficient middle-mile access." (Comments, p. 2)
11	Central Coast Broadband Consortium	Comments	"One of the key factors for success in a statewide middle-mile network is open access. Middle-mile routes are currently available in our region as well as other regions, but privately owned fiber is not leased to all Internet Service Providers (ISPs)." (Comments, p. 2)
12	CenturyLink with Level 3 (collectively Lumen)	Comments	"... the Commission should examine the construction problems encountered by carriers and develop an expedited resolution process in which the Commission facilitates timely construction permits and other regulatory approvals from local jurisdictions and state agencies." (Comments, p. 2)
13	Charter	Comments Replies	"The Commission should focus its middle-mile development recommendations on those areas of the state in which lack of middle-mile networks is truly the bottleneck to broadband access." (Comments, p. 20)
14	City of Los Angeles	Comments	"Your current proposal is based on information that appears to indicate that the City of Los Angeles -- including its high need southeast and northeast valley communities -- is adequately served with high-speed internet infrastructure. This is simply not supported by our data, and the large number of households who are disconnected." (Comments, p. 2)
15	City/County of San Francisco	Comments	"Many cities and counties, either through their municipal electric utilities or municipal fiber optic networks, have already established connections to critical community anchor institutions. As publicly owned assets, these networks provide a way for the State to extend the reach of the middle-mile network to community anchor institutions in a long term, reliable manner at a very low cost." (Comments, p. 3)

Formal Public Comments (continued)

	Organization	Links	Comment Highlights
16	Coachella Valley Association of Governments	Comments	"...CVAG's CV Sync presents a viable option to meet the state's goals while achieving significant savings due to the completed design work for CV Sync. This presents a shovel-ready opportunity to install fiber that will have significant benefits for all the nine cities, four tribes and the County of Riverside, which are served by CVAG." (Comments, p. 5)
17	Comcast	Comments Replies	"The Commission should modify its approach to promote last-mile deployments in unserved areas rather than excess middle-mile capacity along highway corridors connecting areas where robust broadband is already available." (Comments, p. 4)
18	Committee for Greater Los Angeles	Comments	"...for a truly complete analysis of broadband gaps, policymakers need to work more closely with community-based organizations to understand the challenges and opportunities in communities that are experiencing the greatest divide, including how idiosyncratic community factors affect broadband investment and adoption patterns." (Comments, p. 3)
19	Communications Workers of America	Replies	"....ensure that California's middle-mile network enables a futureproof symmetrical last mile network, that deployments prioritize unserved and underserved areas in ESJ communities, tribal communities, and high fire threat areas, and that last mile providers using the state's middle-mile network are required to offer a low-cost broadband plan." (Replies, p. 7)
20	Connected Capital Area Broadband Consortium	Comments	"It is highly preferable for the majority of the deployed middle-mile network to be underground. The majority of Yuba County is in areas prone to high fire risk, thereby necessitating fire resilient broadband middle-mile infrastructure." (Comments, p. 9)
21	Cox Communications	Comments	"Cox strongly recommends that the Commission not make assumptions about percentage of households being served, but rather, follow the steps that SB 156 effectively requires the Commission to take. Prioritizing the federal funding to unserved communities is not only required by statute, but also is the right course of action to bring broadband service to communities without 25/3 service." (Comments. p. 6)
22	CTIA—The Wireless Association	Replies	"....CTIA provides data that show a 100 Mbps download/20 Mbps upload network speed requirement is a more appropriate standard that meets Californians' needs both today and in the future, and often can be deployed to unserved and underserved communities more quickly than fiber-to-the-home." (Replies, p. 3)
23	CVIN, LLC (dba Vast)	Comments	"CVIN has excess capacity. New infrastructure should not be planned in areas where it can be easily acquired from existing carriers." (Comments, p. 2)
24	Electronic Frontier Foundation	Comments	"EFF considers three types of last-mile providers to be of particular importance in helping the state determine where to build its exchange points: 5G providers, loan-loss reserve applicants, and last-mile providers explicitly focused on providing high-speed access to low-income communities." (Comments, p. 7)

Public Comments (Formal) continued

	Organization	Links	Comment Highlights
25	Foothills DeAnza College District	Comments	"Reports from students and employees surfaced stories of interruptions in education or additional challenges to learning as a result of broadband being unavailable, unreliable, or unaffordable." (Comments, p. 2)
26	Frontier	Comments Replies	"... the Commission should strive to: 1) base its determinations on the best data available; 2) coordinate its middle mile priorities with last mile projects that will deliver enhanced services to end users on the shortest possible timeframe; 3) prioritize the deployment of technologies that deliver high speed symmetrical performance and future scalability; 4) address public safety needs in those areas of the state increasingly impacted by wildfires and that lack sufficient diversity of routes; and 5) deploy the funding in a fiscally responsible manner so that it has the broadest impact." (Comments, p. 1)
27	GeoLinks (California Internet)	Comments Replies	"... GeoLinks urges the Commission to establish technology neutral definitions of “last mile” and “middle mile,” ensure existing infrastructure routes have sufficient capacity or the ability to increase capacity as needed, prioritize areas with the most unserved locations rather than areas that lack middle mile access, consider all factors when determining whether to lease existing infrastructure, task the Third-Party Administrator with administering a series of workshops/roundtables with various stakeholders to determine the best path forward for interconnection rules, and ensure scalability throughout the entire Statewide Network." (Comments, p. 12)
28	Greenlining Institute	Comments	"Greenlining recommends that the Commission also consider factors such as rural population density, income level, competition and adoption rate when prioritizing middle-mile constructions as this can improve broadband connectivity for communities of color and low-income families that need it the most." (Comments, p. 5)
29	Inyo County	Comments	"Given the existence of Digital 395 through the length of Inyo County and its alignment with the State’s objectives for a comprehensive open-access middle-mile network, we estimate that a portion of the planned construction depicted in the Anchor Build Fiber Highways document may not need to be constructed, potentially freeing up funds that could be used to extend the new network to reach communities and organizations along CA168 to the west of US395 from Bishop to Aspendell, and along CA168 to the east from Big Pine to the Nevada border." (Comments, p. 4)
30	Legislative Action Committee - Santa Clara County School Board	Replies	"... we urge the CPUC to work with local agencies within each county to plan middle mile routes that will reach our socio-economically disadvantaged residents, including our students, who are currently unserved or underserved." (Replies, p. 3)

Formal Public Comments (continued)

DRAFT

	Organization	Links	Comment Highlights
31	Los Angeles County	Comments	"Equity and impact should be the top criteria for priority routes. For example, the County's underserved and under-resourced areas equal about 416,636 households, which is a significant number of people being deprived of sufficient access, capacity, and speed for teleeducation, telehealth, jobs, and related essential services enabled by broadband infrastructure." (Comments, p. 5)
32	Los Angeles County Economic Development Corporation	Comments	"The LAEDC strongly believes that a 100 Mbps download and 20 Mbps upload (100/20) standard should be the bare minimum for broadband today and will likely be insufficient in the future as demand for increasing bandwidth continues to grow unabated so a state-owned, affordable, open-access middle-mile network should be built with sufficient capacity and appropriate connections between local networks and the global internet to support last mile connections that will meet and exceed that standard at affordable rates for decades to come." (Comments, p. 5)
33	Mono County Board of Supervisors	Comments	"With regard to construction of new middle-mile route, Mono County believes that it may be far more efficient and cost effective to utilize municipally owned rights of way (such as County and Town roads and trails) rather than State and Federal highway corridors." (Comments, p. 4)
34	Next Century Cities	Comments	"Partnering with California communities, the Commission can develop robust data to inform its processes and ensure that the state's open-access middle-mile network is built by centering end-users' needs." (Comments, p. 10)
35	North Bay North Coast Broadband Consortium	Comments	"We request the online map viewer reflect the entirety of each route. In addition to these routes, we request the statewide middle mile network consider major county road corridors as middle mile segments to create additional redundancy, support public safety communications, and to connect to unserved communities and anchor institutions." (Comments, p. 3)
36	Pacific Gas & Electric	Replies	"Like SDG&E, PG&E would require more information from the relevant stakeholders to the questions posed in this Ruling in order to evaluate the extent to which any of PG&E's unrestricted fiber are in locations that would assist a last mile provider in an underserved area." (Replies, p. 1)
37	Race Communications	Comments	"The Commission should attempt to narrow the network to ensure it is only built where it is necessary. " (Comments, p. 1)
38	Rural County Representatives of CA	Comments	"Large-scale, open-access middle mile networks have proven to be effective in many states. This model increases competition and thereby affordability in areas that are currently served by a monopoly and bring quality internet connectivity to regions that have been historically unserved or underserved." (Comments, p. 5)

Formal Public Comments (continued)

	Organization	Links	Comment Highlights
39	San Diego Association of Governments	Comments	"We encourage the Commission to ensure there continue to be adequate opportunities for coordination with regional governments like SANDAG, broadband consortia, and local jurisdictions to maximize our public investments and meet mutual objectives to bridge the digital divide." (Comments, p. 14)
40	San Diego Gas & Electric	Comments	"After review, SDG&E notes that while it has fiber in some locations along the proposed route, it is fiber that was installed for utility operational use and, as of the date of these comments, SDG&E does not have the ability to allow third-parties to access any dark fiber within its system." (Comments, p. 2)
41	Santa Clara County	Comments	"We believe Santa Clara County's strong network of providers, advocates, and public agencies, its acute needs, and its history of innovation would make the county an excellent pilot project for developing models for partnerships that can be replicated statewide." (Comments, p. 9)
42	Small Local Exchange Carriers	Comments	"... the Commission should remain committed to its programs supporting last-mile facilities, including the CHCF-A. In addition, the Commission should maximize the benefit of the resources allocated by SB 156 by minimizing the instances where it recommends overbuilding existing middle-mile infrastructure." (Comments, p. 4)
43	South Valley Internet; LCB Communications	Comments	"We believe that the proposed statewide middle-mile network in Senate Bill (SB) 156 will significantly help reduce the very real Digital Divide within South Santa Clara and San Benito Counties." (Comments, p. 2)
44	Southern California Association of Governments	Comments	"...the CPUC [should] consider identifying locations for the middle-mile network to enable last-mile deployment and prioritize areas that are underserved, meaning areas that consist of: low-income households in urban areas, underserved rural and Tribal lands, and areas with a high populace of senior citizens (aged 65+)." (Comments, pp. 3-4)
45	Southern California Edison	Comments Replies	"The Commission Should Design a Middle-Mile Network That Targets Rural and Remote Communities, which are the Communities That Need Broadband AND Where the Lack of a Robust Middle-Mile Network is a Barrier" (Comments, p. 3)
46	The Utility Reform Network (TURN)	Comments Replies	"For the Commission's review of existing middle mile infrastructure, the Commission should consider the capacity of the route to handle both current demand and, perhaps more importantly, future demand for open-access use by other carriers and interconnection that will anticipate growth in these specific regions." (Comments, p. 2)
47	Unite LA	Comments	"Having access to affordable AND high-quality internet options has been a leading barrier to greater adoption for Angelenos who aren't currently connected. " (Comments, p. 3)

Formal Public Comments (continued)

	Organization	Links	Comment Highlights
48	US Telecom	Comments Replies	"Based on their experiences, USTelecom recommends the Commission should: 1) prioritize unserved and isolated areas; 2) deploy networks that support future growth; 3) coordinate with state and federal agencies to avoid duplicating existing broadband deployment efforts; 4) take advantage of existing open access infrastructure; 5) connect the middle mile network to areas where private broadband providers are investing in last mile networks; and 6) invest in fiber capacities that futureproof the network." (Comments, p. 1)
49	Utility Consumers' Action Network	Comments Replies	"Open-access middle mile networks, situated in carefully considered locations, will encourage competitive entry and assist the state in achieving ubiquitous, reliable broadband service for all Californians." (Comments, p. 1)
50	Verizon (Cellco Partnership)	Comments	"... the routes that the Commission recommends to CENIC, the Third Party Administrator (TPA) retained as a result of SB 156 should include routes where last mile wireless service to underserved and unserved communities is made economically possible because of the deployment and use of the statewide open access middle mile network." (Comments, p. 4)
51	Yurok Tribe	Comments	"We strongly recommend that infrastructure construction within the Yurok Ancestral Lands and Yurok Reservation comply with the Yurok Tribe's regulations and permitting, particularly environmental and cultural regulations." (Comments, p. 11)
52	Zayo Group	Comments	"... Route 395 is included among the highway routes in Lassen and Modoc counties but not in Sierra County. Zayo believes that this was likely a clerical error given its inclusion in the Anchor Build Fiber Highways map and requests that Attachment A to the ACR be revised to include State Route 395 as one of the covered routes in Sierra County." (Comments, p. 2)

Informal Public Comments

DRAFT

View the following comments at: <https://apps.cpuc.ca.gov/apex/f?p=401:65:0::NO::>

Local Governments		
	Name	Comment Highlights
1	City of Moorpark	"The primary purpose of this letter is to advise the Commission that the City of Moorpark is planning to construct a Meet-Me Room that would be available for lease by the state, in support of its Middle-Mile Network. The currently proposed network includes a run within SR-23 (Moorpark Avenue) through the City of Moorpark and almost immediately adjacent to our Meet-Me Room site, which is immediately west of the U.S. Post Office located at 100 W. High Street in Moorpark (93021)"
2	Dan Miller, Chair County of Nevada, Board of Supervisors	"1. We respectfully request that the state-owned middle-mile network extend beyond its current (proposed) termination point in Nevada City, continuing northwest along Highway 49 to North San Juan and northeast along Highway 20 to the Town of Washington. ... 2. We request that the middle mile reach Grass Valley by traversing north up State Route 49 from Auburn (instead of coming via Highway 174 from Colfax), allowing it to serve the communities of Lake of the Pines (population 4,301) and Alta Sierra (population 7,204) along the way. 3. Nevada County would like to see a rural Internet Exchange Point (IXP) built in our community as part of the open-access middle-mile network construction. "
3	David Griffith County of Alpine District 5 Supervisor	"In addition to the Bear Valley and Lake Alpine communities discussed in Alpine County's initial comments, the communities currently left off the proposed middle mile map are: 1. Hung-a-lai Community of the Washoe Tribe of Nevada and California is an unserved community and disadvantaged community. A spur to the middle mile network from Woodfords along Diamond Valley Road would serve this community. ..."
4	Frank Axe, Chairman County of Amador, Board of Supervisors	"1. We would like to see the middle-mile extension run from a current public access fiber network hub, using the existing and old State Highway 49 routes to the following underserved communities of the City of Sutter Creek, Amador City, Drytown, Plymouth, Shenandoah Valley, Fiddletown, and River Pines. New proposed middle mile route provisioned with access vaults placed near existing area of commerce and projected new areas of commerce. 2. We would like to see a middle mile extension run from the intersection of State Highway 49 and State Highway 16 (using an interconnect to the above proposed fiber extension) to a public access fiber hub located in Sacramento County with access vaults placed near existing areas of commerce and projected new areas of commerce. 3. Amador County has a local internet service provider (Volcano Communications) that has installed significant amounts of broadband fiber around the county, particularly on the eastern side. It would be productive for the CPUC to formally discuss plans and maybe even collaborate with them."

Informal Public Comments (continued)

DRAFT

View the following comments at: <https://apps.cpuc.ca.gov/apex/f?p=401:65:0::NO::>

Local Governments		
	Name	Comment Highlights
5	Hong Sae, Chief Information Officer, City of Roseville	"... we know how critical it is to these students that the digital divide/digital equity gap that exists is eliminated to ensure they have the foundation to thrive in their academic studies. It is for these reasons that we are requesting the CPUC's consideration to provide fiber cabling to the approximately 20 Adventure Club sites or closes roadway intersection located throughout our entire community to include the network equipment to connect Internet, Network, WiFi, and VoIP extension to these facilities."
6	James Corless Sacramento Area Council of Governments	"We support the deployment of the open access state-owned middle mile network. The CPUC should consult with cities and counties to ensure that the middle-mile network supports the unserved populations. Local governments are well-positioned to weigh in on these issues and as the CPUC moves forward, should afford more time for local government input."
7	Kathleen Haff County of Tuolumne Board of Supervisors	"1) To the north, I see Hwy 88 and Hwy 12 connecting the valley with the foothills, in the San Andreas area, which is great. Please keep that! 2) However, in the central foothills, Highway 108 does not connect the valley with Tuolumne County. By geographical size and population, Tuolumne County is the largest County in the Central Sierra region (which consists of Amador, Alpine, Calaveras, Tuolumne and Mariposa Counties). Both Tuolumne County and the County Seat of Sonora, need this vital connection, and redundant broadband routing to the valley. Please correct this omission. You will see there is a break on Hwy 108 between Oakdale and Sonora."
8	Libby Schaaf, Mayor City of Oakland	"SB 156 - perhaps the greatest investment in digital infrastructure in our state's history - could provide the foundation for ubiquitous municipal broadband in Oakland, but only if CPUC locates middle mile fiber adjacent to our most under-connected communities, specifically from I-880 starting in West Oakland, extending south to Route 185 (East 14th / International Boulevard), and ending in Hayward, all of which is is zoned as a state highway. CPUC's current segment proposal would do little to serve our most under-resourced communities."
9	Loren Taylor, Councilmember Oakland City Council	"The CPUC commission should promote equity by revising the map to include Route 185 (East 14th / International Boulevard). This revision would factor in the affordability of middle mile services by prioritizing (1) a community's proximity to new fiber segments, (2) the median wealth or average household income of surrounding families, and (3) the population density within a last mile connection of the proposed fiber segment. International Boulevard bisects an area deemed uneconomic by ISPs, where one or two providers hold a virtual monopoly and thus control the price of service, and where commercial ISPs are unwilling to lease their dark fiber assets."

Informal Public Comments (continued)

DRAFT

View the following comments at: <https://apps.cpuc.ca.gov/apex/f?p=401:65:0::NO::>

Local Governments		
	Name	Comment Highlights
10	Nate Miley County of Alameda Board of Supervisors	"... my office would like to propose a different path for this fiber backhaul, originating at the southernmost point of Route 185 (a state highway more commonly referred to as International Boulevard and East 14th Avenue), north to the I-880 interchange, and into West Oakland. This fiber line would bisect the most under-connected areas of Oakland and enable Alameda County to support last mile connectivity to our constituents."
11	Noel Gallo Councilmember, District 5, Oakland City Council	"The current map from the Commission circumvents the Fruitvale district, an area that your own maps show has the least access to broadband internet access. For SB 156 is to live up to its mission of bridging the digital divide, the Commission should redirect Oakland's fiber from the hills to the flatlands, specifically along Route 185 - a state highway more commonly referred to as International Boulevard."
12	Ryan Coonerty County of Santa Cruz Third District Supervisor	"I am contacting you today in support of the comprehensive broadband infrastructure package known as the "Middle Mile," including the proposed route up Highway 1 in Santa Cruz County."
13	County of San Bernardino	"It is essential to immediately focus on providing Internet access to the hardest-to-reach residents—rural unserved communities, Tribal Lands, and poor urban underserved neighborhoods. The construction of a middle-mile only network will not assure last-mile connectivity in a reasonable timeframe. However, construction of publicly subsidized open-access middle-mile infrastructure that includes last-mile deployment achieves the best of both objectives—assures immediate Internet access for unserved and underserved households while also allowing other last-mile providers to access the middle mile thereby increasing competition and expanding consumer choices to include moderate prices."
14	County of San Mateo	"We are requesting your consideration that the middle mile broadband fiber infrastructure along the stretch of Highway 1, currently ending at the southern end of Half Moon Bay, be extended 28 miles to the southern border of San Mateo County. Extension of the middle mile broadband infrastructure to this area will facilitate significant equity, quality of life, and economic benefits to the community"
15	Terry Woodrow Chair – County of Alpine Board of Supervisors	"...the Alpine County Board of Supervisors respectfully requests that the "Middle Mile" Advisory Commission extend the proposed Middle Mile Network up California Highway 4 from Arnold in Calaveras County to Bear Valley and Lake Alpine. Connectivity in rural areas is not only critical to our economic success, it is our lifeline to the outside world."
16	Treva Reid Councilmember, District 7, Oakland City Council	"The inclusion of a fiber line along I-880 and International Blvd, that trails from East Oakland to Downtown, would provide tens of thousands of our community members with a low-cost internet option. BlocPower, the tech firm helping our district assess the feasibility of various municipal broadband options, has emphasized that ubiquitous access would require high-capacity fiber (488 count) and should support last mile extensions by including splice points and handholes at major intersections"

Informal Public Comments (continued)

DRAFT

View the following comments at: <https://apps.cpuc.ca.gov/apex/f?p=401:65:0::NO::>

Other Organizations		
	Name	Comment Highlights
1	Chase Stafford Partnership for LA Schools	"... we urge you to remember that current infrastructure is not reaching hundreds of thousands of Californians in urban areas because of issues of affordability, lack of competition and underinvestment. As a critical first step, we urge you to invest in more robust, granular data that captures precise locations and quality of service to guide broadband policy making."
2	Elmer Roldan Communities In Schools of Los Angeles	"We urge the CPUC to prioritize unserved and underserved communities in Los Angeles. During the past 18 months, the families have experienced inconsistent broadband services including packages that are unaffordable and/or too low-quality internet access. We ask the CPUC to approach infrastructure deployment comprehensively and ensure that middle-mile infrastructure is made available to municipalities via open access."
3	George Holland, Sr Oakland Branch NAACP	"An eight to ten mile stretch of fiber line through this district could support connectivity of tens of thousands of residents who for too long have been left behind amidst Silicon Valley's economic boom. Include I-880 from Oakland's Downtown south to Route 185 (International Boulevard/E.14th) through East Oakland and into San Leandro on your next map. Do what is right."
4	Glenn Schatz BlocPower	"I am writing on behalf of BlocPower, a climate technology company expanding access to electrification and internet services, to urge you to reconsider SB 156's proposed middle mile fiber map in Oakland. In the current iteration of the proposed map, the fiber line segments circumvent the areas of Oakland that are least connected, most notably along I-880 from Oakland's downtown to San Leandro, International Boulevard, and highway-zoned portions of MacArthur Boulevard."
5	Jay Artis-Wright Parent Revolution, LA	"Middle-mile infrastructure must be available to municipalities via open-access. As we pursue the context of equitable digital access, it is important to acknowledge that the available services such as AT&T and Spectrum are not the only service plans our families use."
6	Keith Dell'Aquila California Charter Schools Association	"1. CPUC must consider unserved and underserved communities. While it is true that some parts of California have no wired infrastructure, major metropolises, like Los Angeles County, have large swaths of ill-served, unaffordable, and low-quality broadband regions (cyber-redlined) disproportionately impacting children of color from working class and low-income households."
7	Lucero Chavez Parent Institute for Quality Education	"1.The CPUC must consider unserved and underserved communities. While it is true that some parts of California have no wired infrastructure, major metropolises, like Los Angeles County, have large swaths of ill-served, unaffordable, and low-quality broadband regions (cyber-redlined). The CPUC must approach infrastructure deployment comprehensively, not disparately. 2.Middle-mile infrastructure must be available to municipalities via open-access. a.While Los Angeles County has a high salience of wired infrastructure, the vast majority of it is owned by AT&T and Spectrum. This means it is not open-access and unavailable at an affordable rate. 3.Counties are an inaccurate unit of measurement to deploy broadband infrastructure. Instead, use PUMAs. "

Informal Public Comments (continued)

DRAFT

View the following comments at: <https://apps.cpuc.ca.gov/apex/f?p=401:65:0::NO::>

Other Organizations		
	Name	Quote
8	Maiesha Kif Los Angeles Urban League	"Counties are an inaccurate to deploy broadband infrastructure, consider using Public Use Microdata areas to allow granular data to help make decisions regarding the impacted regions within the county. The Los Angeles Urban League is dedicated to the advancement of equity in our underserved communities and it is our hopes that the CPUC will prioritize the need in the low/mildly income areas."
9 – 14	Melissa Aguilar-Perez - LA Emittzi Reyes - Rosemead Lindsey Perez - LA Julia Macias - Reseda Dylan Nunez - Long Beach Evelyn Aleman - LA	" Our Voice: Communities for Quality Education is an equity-focused initiative that supports Latino immigrant parents in Los Angeles, most of whom do not have access to affordable and reliable intern/broadband service. We ask the CPUC to prioritize our highest-need cyber redlined communities as it makes plans for CA's digital infrastructure."
15	Ray Lopez-Chang Great Public Schools Now	"We believe the CPUC has an important responsibility to consider middle-mile broadband infrastructure deployment as an opportunity to ensure open-access. Local municipalities are well-positioned to provide a truly affordable, easily accessible internet option for our highest-need families."
16	Sandy Mendoza Families In Schools	" • Prioritize unserved and underserved communities – While some parts of California lack wired infrastructure, larger urban areas like Los Angeles County have swaths of ill-served, unaffordable, and low-quality broadband (cyber-redlined) regions. The CPUC must approach infrastructure deployment comprehensively, not disparately. • Middle-mile infrastructure must be available to municipalities via open-access – While Los Angeles County has a high salience of wired infrastructure, the vast majority of it is owned by AT&T and Spectrum. This means it is not open-access and available at an affordable rate. • Counties are an inaccurate unit of measurement to deploy broadband infrastructure. Instead, use PUMAs"
17	Sarina Sande Educators for Excellence Los Angeles	"I'm writing on behalf of Educators for Excellence Los Angeles to urge you to consider unserved and underserved communities in the middle-mile broadband infrastructure plan. Los Angeles County, home to the 2nd largest school district in the nation, has large swaths of ill-served and low-quality broadband regions."

Informal Public Comments (continued)

DRAFT

View the following comments at: <https://apps.cpuc.ca.gov/apex/f?p=401:65:0::NO::>

Individuals		
	Name	Comment Highlights
1	Ana Teresa Dahan - LA	"I have experienced how the street and zip code where I live has directly impacted whether the internet is available to me, the cost of the internet I pay, and the quality of internet I can experience. I urge the CPUC to adopt policies and take action that leverage California's unprecedented funding to connect middle-mile infrastructure to last-mile projects. This will ensure that access, cost and quality of one's internet does not depend on the street or zip code they live in."
2	Ray Lopez-Chang - LA	"Several regions of Los Angeles continue to struggle with low quality internet. Broadband infrastructure deployment should remain focused on activating an equity framework, where both unserved and underserved communities are supported, middle-mile infrastructure becomes open access, and PUMAs are used as a unit of measurement, instead of counties."
3	Ana Ponce - LA	"The CPUC must pursue policies and actions that connect middle-mile infrastructure investments to last-mile projects to get more unserved Californians online, and more underserved Californians access to faster, more reliable, more affordable broadband. Although our schools are reopened, we know the consequences of digital inequity."
4	Cole Przybyla - Sonora	"In multiple sections throughout the Central Sierra, the Commission left important sections of fiber out. Consider creating full loops on Hwy 108 from Oakdale to Sonora, Hwy 49 in Amador and an extension up Hwy 4 to Lake Alpine."
5	Larry Fondation - LA	"I am on the road. I wished echo the comments of Elmer Roldan. Thank you! On behalf of united parents and students."
6	Vanessa Aramayo - LA	"The CPUC must consider unserved and underserved communities. While it is true that some parts of California have no wired infrastructure, major metropolises, like Los Angeles County, have large swaths of ill-served, unaffordable, and low-quality broadband regions (cyber-redlined). The CPUC must approach infrastructure deployment comprehensively, not disparately."
7	Nate Miley - Oakland	"Broadband access is a necessity, especially now in the times of COVID. Students need broadband to access their education, families to connect with social services, and the elderly to restore social connection, telehealth, and more."
8	Alexa Sass - LA	"Ensuring that the CPUC's approach to broadband access is intentional and comprehensive in each community can avoid additional disparities in access to the internet and all the opportunities that come with internet accessibility (telehealth, education, information, political engagement, employment, etc.)."
9	Michael Paster Los Angeles, CA	"In underserved markets, Californians pay more to get less. The need for a publicly owned option for broadband internet and infrastructure is here and it's high. More people would pay for internet access at home if it was just more affordable"