



September 23, 2021

Dear CPUC Commission,

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. These circumventions exclude Oakland's poorest residents and areas—like the flatlands of East Oakland—from California's historic investment of \$3.25 billion to expand high-capacity, high-speed internet. As such, the proposed map is unjust and fails to adequately close California's digital divide.

SB 156's investment in middle mile fiber has the potential to ameliorate decades of digital inequity in Oakland and across California. By promoting internet affordability and community ownership, creating tens of thousands of jobs, and enabling teleworking, telelearning, and telehealth, this once-in-a-generation investment could bring Oakland's most marginalized communities closer to much-needed economic opportunity. Especially amidst the COVID-19 pandemic, increasing broadband access and closing the digital divide must be considered a 21st-century necessity.

Commercial internet service providers (ISPs) have divested from low-income communities for decades. Because of that legacy, we must now turn to innovative last-mile providers and new ownership models (like community and cooperative WiFi) to equitably increase broadband access. Unfortunately, the CPUC's misguided middle mile map would effectively lock out new players and new models. Oakland's 2019 Master Fiber-Optic plan estimates that fiber installation in Oakland costs over \$100/foot. At this rate, diverting cable from CPUC's proposed installation along I-580 to the flatlands—where it's needed most—would cost millions of dollars. Oakland's residents cannot afford that expense, and they cannot afford to leave broadband access in the hands of unchallenged, incumbent providers.

Oakland has rallied to respond to its connectivity disparities exacerbated by the pandemic. The city utilized \$7.7 million dollars in CARES Act funding to launch an ambitious pilot to expand broadband access called OakWifi. While serving as proof of concept, the network is built on a limited-capacity, microtrenched fiber line unable to extend connection into many homes and businesses.

BlocPower is ready and able to launch an Oakland-wide, community-owned hybrid private LTE (PLTE) network. The PLTE network would enable Oakland to connect its citizens most in need of broadband quickly, without making large investments in bringing new buildings online. It would also allow Oakland the flexibility of using Wi-Fi mesh where appropriate.

So far, BlocPower has planned and developed three installations of pilot PLTE networks in Oakland, which would reach over 30,000 residents. We are also working with partners and donors to deploy

significant capital supporting and expanding this effort. However, even these pilot projects are limited in scope—and made more expensive—by East Oakland’s lack of access to commercial and municipal middle mile fiber. BlocPower is relying on equitably deployed middle mile fiber in Oakland to lay the necessary groundwork for further development—fostering competition, creating jobs, enabling innovation, and lowering costs. Middle mile fiber, in the right places, would enable BlocPower to connect the remaining 20% of Oakland citizens and 2% of students who still lack internet access, closing the digital divide once and for all.

Governor Newsom signed SB 156 to ensure that “California’s economic recovery will leave no part of our state behind.” The CPUC should make that claim a reality by including I-880 from Oakland’s downtown to San Leandro, International Boulevard, and highway-zoned portions of MacArthur Boulevard on its next middle mile fiber map.

Thank you for your consideration. Please let me know if you have any questions or need additional information.

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