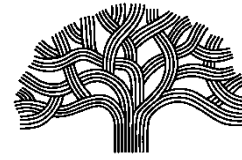


CITY OF OAKLAND



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September 2, 2021

California Public Utilities Commission
Public Advisor's Office
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments on SB 156 Middle Mile

Dear CPUC Commission,

As Mayor of the City of Oakland, I am writing to share my comments regarding the proposed Middle Mile map released by the CPUC.

Oakland strives to be a vibrant, equitable city where everyone thrives, and everyone feels a deep sense of belonging. Standing in the way of this vision remains persistent, historic inequities, including the digital divide - a crisis in access laid bare by the pandemic. For the past 18 months, Oakland has rallied to respond to the connectivity needs exacerbated by a pandemic. Schools, community-based organizations, and private industry have come together to resource emergency stopgap measures: school-loaned computers, refurbished devices, internet hotspots, and technical support to tens of thousands of Oakland students and families.

Oakland has the technical skill and the community will to implement broadband solutions. The City recently launched OakWifi - an open access network serving outdoor spaces from Downtown into East Oakland funded by \$7.7 million CARES act dollars. This is just the first step towards addressing digital inequity. Unfortunately, the limited, microtrenched fiber backhaul along segments of Route 185 (International Boulevard) prevents us from providing a reliable, high-speed connection that extends into homes and businesses. Digital access remains unacceptably low in Oakland's flatlands. Robust infrastructure investment is required to create sustainable solutions that close the digital divide for good.

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. 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.

Installation should be guided by two principles: future-proofing and maximum flexibility. Since the majority of the cost of fiber projects is incurred during excavation, CPUC should add additional conduit for future expansions, and pull at least 488 count to start. The conduit design should support future network scenarios by adding splice points and handholes at every major intersection or other likely future hub locations.

Finally, the Commission cannot limit the definition of priority areas to counties with a disproportionately high number of unserved households because that overlooks the wide disparities that exist within counties. Instead, the State should factor in population density or absolute number of under-connected households within a last mile connection to avoid continuing America's long documented history of divestment in marginalized urban communities. To realize a vision of Oakland where all belong, we must invest in a more equitable Oakland and a more equitable California. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "Libby Schaaf".

Mayor Libby Schaaf
Oakland CA