

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Regarding  
Broadband Infrastructure Deployment and  
to Support Service Providers in the State  
of California.

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Rulemaking 20-09-001

**REPLY COMMENTS OF THE OFFICE OF THE MAYOR, CITY OF LOS  
ANGELES, REGARDING ASSIGNED COMMISSIONER’S RULING**

October 15, 2021

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Rulemaking 20-09-001

**RE: E-MAIL RULING ORDERING ADDITIONAL COMMENTS AS PART OF  
MIDDLE-MILE DATA COLLECTION**

The Office of the Mayor, City of Los Angeles, respectfully submits these reply comments to the California Public Utilities Commission in response to the opening comments filed by the Los Angeles Economic Development Corporation on October 1, 2021 on the administrative law judge's ruling in the above-captioned docket, emailed to parties on September 9, 2021, which established the deadline for filing reply comments to October 15, 2021.

**Comment on Issue 5: Consider the Potential to Assist in the Development of Public  
Broadband Networks**

We agree with the Los Angeles Economic Development Corporation (LAEDC) that the establishment of an open-access middle-mile network has the potential to support public investment into the communities where it is most needed.

The City of Los Angeles, under the coordination of our Bureau of Street Lighting, is expanding existing and exploring potential new City investments into municipally owned fiber infrastructure and fiber-capable conduit. Enhanced and improved municipal infrastructure would allow the City to partner with private service providers to provide more affordable or otherwise more equitable broadband service, leveraging reduced private capital investments. If City investments can be coordinated with the State's proposed open-access middle-mile network, we believe that the impact of our collective investments can be transformative. This ability to partner extends to coordination with other municipalities, school districts, transportation providers, and others who own infrastructure that can be leveraged, as well as working closely with private providers to have a comprehensive solution to the middle mile across the state. Excluding cities from this conversation excludes a crucial provider and the representatives of the residents that need to advocate and allocate resources and priority to areas of highest need. The City of Los Angeles has worked hard and passionately to be business friendly to our telecom partners in enabling them to build faster and inexpensively across the City, but in coordination with our existing infrastructure and resident requirements for public safety and security.

Assertions that the middle mile infrastructure can be managed by any one party to this collaboration is underestimating the complexity of the as-built and to-be-built infrastructure. And assertions that such infrastructure exists sufficiently in urban areas continues to be proven to be wholly untrue as we see neighborhoods left behind the digital divide.

We ask that the commission consider partnering with local jurisdictions who are planning and/or implementing direct public investments into broadband infrastructure, and to consider these local networks in determining routes. Publicly owned infrastructure, when coordinated and combined across jurisdictions and between middle- and last-mile, has tremendous potential to bring greater equity and service to disconnected communities.

Dated: October 15, 2021

Respectfully submitted,

/s/ Jeanne Holm

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