

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

Via email

November 3, 2020

Mr. Torry R. Somers, Vice President  
State Regulatory Affairs-West Charter Communications, Inc.

Subject: 20INF001 - Ministerial Approval of Nine Charter Communications'  
California Advanced Services Fund Infrastructure Grant Applications

Dear Mr. Somers,

Staff has reviewed the sixteen California Advanced Services Fund (CASF) Infrastructure Grant applications submitted by Charter Communications (Charter) on May 4, 2020 and determined that nine of the projects are eligible for Ministerial Review and approval under the program rules established in Decision (D.)18-12-018. The below nine projects will receive 100% funding, for a total of up to \$8,738,007.87 in grant funding. A detailed accounting of the funding levels is provided in Appendices 1-11.

Project	Funding Requested	Households
Brookside Country Club	\$848,062.95	207
Country Meadows Mobile Home Park	\$2,120,390.00	295
El Dorado Estates	\$1,445,032.02	160
Foothill Terrace Mobile Home Village	\$444,388.17	308
Los Alisos and Los Robles Mobile Estates	\$1,021,655.13	334
Monterey Manor Mobile Home Village	\$784,322.00	87
Plaza Village Mobile Estates	\$622,810.66	163
Soboba Springs Mobile Estates	\$907,817.00	217
Villa Montclair Mobile Home Park	\$543,529.94	62
<b>Total</b>	<b>\$8,738,007.87</b>	<b>1833</b>

The approved projects will deploy last-mile coaxial and fiber infrastructure to enable broadband access at speeds of up to 940 megabits per second (Mbps) download and 35 Mbps upload to a total of 1833 CASF-eligible households. The approved projects will

enable broadband access to areas that are currently unserved with no facilities-based wireline or fixed wireless broadband service providers.

Should Charter agree to the terms set herein requirements specified in D.18-12-12, please complete and sign the Consent Form attached as Attachment A. The executed Consent Form along with a completed STD 204 Payee Data Record (see Attachment B) must be emailed to [CASF\\_infrastructure\\_grant\\_administrator@cpuc.ca.gov](mailto:CASF_infrastructure_grant_administrator@cpuc.ca.gov) within 30 calendar days from the date of this letter (no later than December 3, 2020). Should Charter not accept the award, through failure to submit the Consent Form within 30 calendar days from the date of this letter's adoption, the Commission will deem the Grant or award to be null and void.

Please contact Louise Fischer, Program and Project Supervisor, at [louise.fischer@cpuc.ca.gov](mailto:louise.fischer@cpuc.ca.gov) or 415-703-1803 if you have any questions or need additional information.

Sincerely,



Robert Osborn, Director  
Communications Division

Attachments:

Appendices:

- Appendix 1: CASF Determination Overview for Nine Ministerially Approved Projects
- Appendix 2: Brookside Country Club
- Appendix 3: Country Meadows Mobile Home Park
- Appendix 4: El Dorado Estates
- Appendix 5: Foothill Terrace Mobile Home Village
- Appendix 6: Los Alisos and Los Robles Mobile Estates
- Appendix 7: Monterey Manor Mobile Home Village
- Appendix 8: Plaza Village Mobile Estates
- Appendix 9: Soboba Springs Mobile Estates
- Appendix 10: Villa Montclair Mobile Home Park
- Appendix 11: Payments to CASF Recipients

Attachment A: Consent Form

Attachment B: STD 204 Payee Data Record or electric fill at <https://www.documents.dgs.ca.gov/dgs/fmc/pdf/std204.pdf>

**APPENDIX 1**  
**Charter Communications**  
**CASF Determination Overview for Nine Ministerially Approved Projects**

**SUMMARY**

The Communications Division (CD) approves funding from the California Advanced Services Fund (CASF) in the amount of \$8,738,007.87 for nine grant applications from Charter Communications Operating, LLC (Charter) on behalf of its affiliated entities Spectrum Pacific West, LLC; Charter Fiberlink CA-CCO, LLC (U-6878-C); and Time Warner Cable Information Services California, LLC (U-6874-C). The nine projects are: Brookside Country Club, Country Meadows Mobile Home Park, El Dorado Estates, Foothill Terrace Mobile Home Village, Los Alisos and Los Robles Mobile Estates, Monterey Manor Mobile Home Village, Plaza Village Mobile Estates, Soboba Springs Mobile Estates, and Villa Montclair Mobile Home Park (collectively known as the “approved projects”).<sup>1</sup>

Staff determined that these nine Charter projects are eligible for Ministerial Review and approval under program rules established in Decision (D.)18-12-018. The approved projects will deploy last-mile coaxial and fiber infrastructure to enable broadband access at speeds of up to 940 megabits per second (Mbps) download and 35 Mbps upload to a total of 1833 CASF-eligible households in its nine approved projects. The approved projects will enable broadband access to areas that are currently unserved with no facilities-based wireline or fixed wireless broadband service providers.

**BACKGROUND**

The CASF Infrastructure Grant Account (CASF Infrastructure) provides grant funding to Internet service providers to build or upgrade broadband infrastructure in areas that are unserved by existing broadband providers. The CASF program was initiated in 2008, after the program was first adopted by the Commission in D. 07-12-054 and enacted into statute pursuant to Senate Bill 1193.

On October 15, 2017, Governor Brown signed Assembly Bill (AB) 1665 (Garcia) into law.<sup>2</sup> That legislation amended the statute governing the CASF program, Public Utilities Code § 281. The Commission issued D.18-12-018 adopting the programmatic changes to the CASF. Appendix 1 of D.18-12-018 set forth the rules, application

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<sup>1</sup> Each of the 9 applications are individually analyzed in the Appendices to this letter. Summary information only is reported in Appendix 1 of this letter. Appendix 11 covers payments to CASF grant recipients.

<sup>2</sup> AB 1665 is codified at Public Utilities (Pub. Util.) Code § 281.

requirements and guidelines for the CASF Infrastructure Grant Account (CASF Infrastructure).<sup>3</sup>

On June 29, 2020, Governor Newsom signed AB 82 into law amending Public Utilities Code § 281 to authorize leveraging of CASF Infrastructure grant funding to supplement the costs of broadband infrastructure already funded, in whole or in part, by the federal Rural Digital Opportunity Fund (RDOF).<sup>4</sup> In an effort to effectively utilize state and federal funding toward meeting the CASF program goals, Staff has recommended project applications that include areas eligible to receive RDOF may be deferred for approval until after the results of the RDOF Phase I (Auction 904) have been published.<sup>5</sup>

On May 4, 2020, Charter submitted sixteen CASF Infrastructure grant applications. CD staff determined that nine of those sixteen applications were eligible for Ministerial Review. The nine approved projects requested total funding of \$8,738,007.87 to serve 1833 unserved households. The approved projects are located in ten mobile home parks throughout nine communities in Los Angeles, Orange, Riverside, San Bernardino and Ventura Counties. The approved projects will enable broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

Household and funding requested for the nine approved projects are displayed in Table 1 below.

**Table 1: Charter’s Approved Projects**

	<b>Project</b>	<b>Households</b>	<b>Funding Requested</b>
1	Brookside Country Club	207	\$848,062.95
2	Country Meadows Mobile Home Park	295	\$2,120,390.00
3	El Dorado Estates	160	\$1,445,032.02
4	Foothill Terrace Mobile Home Village	308	\$444,388.17
5	Los Alisos and Los Robles Mobile Estates	334	\$1,021,655.13
6	Monterey Manor Mobile Home Village	87	\$784,322.00
7	Plaza Village Mobile Estates	163	\$622,810.66
8	Soboba Springs Mobile Estates	217	\$907,817.00
9	Villa Montclair Mobile Home Park	62	\$543,529.94
	<b>Total</b>	<b>1833</b>	<b>\$8,738,007.87</b>

<sup>3</sup> The Commission extended the CASF Infrastructure application deadline from April 1 to May 4, 2020, and all subsequent deadlines are moved back by one month due to the COVID-19 emergency. Assigned Commissioner’s Ruling R.12-10-012, March 26, 2020.

<sup>4</sup> See Public Utilities Code § 281(b)(1)(B)(ii).

<sup>5</sup> See Staff Proposal on State-Federal Broadband Infrastructure Funds Leveraging Rulemaking (R.)20-08-021, October 1, 2020, which is pending Commission decision.

Charter was formed in 1993 and became a publicly traded company in 1999. Charter, Time Warner Cable and Bright House Networks combined in 2016 to form the provider that now serves over 30 million customers in the United States.<sup>6</sup> Charter received approval for this merger in D.16-05-007 and received its latest statewide video franchise update from the Commission in 2018.<sup>7</sup> Charter offers high speed Internet service, Voice over Internet Protocol (VoIP) as well as cable television service in California through a number of plans, including Spectrum Internet Assist for qualifying low-income households.

## **NOTICE**

On May 18, 2020, Staff posted the proposed project area maps, census blocks (CBs) and zip codes for the proposed projects on the Commission's CASF webpage under "CASF Application Project Summaries" and sent notice regarding the project to its CASF Distribution List.<sup>8</sup>

## **PROTEST/CHALLENGES**

No protests or challenges were received for the nine proposed projects approved in this Letter.

## **DISCUSSION**

In compliance with D.18-12-018, Staff determined that nine of Charter's sixteen proposed projects qualified for Ministerial Review and Approval and were eligible to receive \$8,738,007.87 in CASF Infrastructure grant funding.

The Commission delegates to Communications Division Staff the authority to approve applications, including the determination of funding, that meet the following criteria:

- Applicant meets the program eligibility requirements.
- The application is not challenged, or Staff has determined the project area is unserved.
- The grant does not exceed \$10,000,000.
- The project is California Environmental Quality Act (CEQA) exempt.
- There must be no competing applications for the same project area.

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<sup>6</sup> Charter Communications History: <https://corporate.charter.com/history-decade>

<sup>7</sup> CPUC, Video Franchising Applications: <https://www.cpuc.ca.gov/General.aspx?id=6442456379>

<sup>8</sup> CPUC, CASF Applications Project Summaries: <https://www.cpuc.ca.gov/General.aspx?id=1040>

- Cost per household for projects building wireline connections are \$9,300 per household or less.

In compliance with D.18-12-018, Staff determined that Charter is eligible to receive 100 percent funding for each of the approved projects. Detailed analysis for each project is contained in the Appendices of this Letter. Table 4, under Section III, Funding Level Determination, contains Staff's funding recommendations.

Charter is required to comply with all guidelines, requirements, and conditions associated with the grant of CASF Infrastructure funds. Payments to Charter will be made in accordance with Pub. Util. Code § 281(f)(11).

Overviews of Staff analyses for the approved projects are explained specifically in the following sections. Detailed analyses of sections I, II, III, IV, and V for each approved project is contained in the Appendices of this Letter.

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

#### **I. Project Area Eligibility**

No provider filed a "right-of-first-refusal" submission for Charter's proposed project areas by January 15, 2020, nor do the approved project areas include census blocks identified by the Federal Communications Commission's Connect America Fund Phase II program.<sup>9</sup> Staff determined that Charter's nine proposed projects, listed in Table 1 above are eligible for CASF Infrastructure grants.

According to the California Interactive Broadband Map, Staff deems the households in the nine project areas to be unserved and thus eligible for CASF Infrastructure grant funding.

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<sup>9</sup> Pub. Util. Code 281 (f)(4)(A)(ii) prohibits the Commission from awarding CASF funding to a project applicant if the existing facility-based broadband provider demonstrates, in response to the Commission's annual offer, that it will deploy broadband or upgrade existing broadband service throughout the proposed project area within 180 days.

## II. Minimum Performance Criteria

Staff reviewed Charter’s applications and determined that the nine approved projects meet the minimum performance criteria pursuant to D.18-12-018, Appendix 1, Section 6, as summarized below in Table 2.

**Table 2: Minimum Performance Criteria**

	<b>CASF Performance Criteria</b>	<b>Approved Projects</b>
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Within 12 months  (CEQA Exempt)
<b>Pricing</b>	Price commitment for two years after completion of the project	2 Years
<b>Speed</b>	At least 10/1 Mbps	Up to 940/35 Mbps
<b>Latency</b>	Maximum of 100 ms of latency	< 100 ms
<b>Data Caps</b>	Minimum of 190 GBs per month	No data cap
<b>Affordability</b>	Must offer low-income plan	\$17.99 monthly

**Charter’s nine approved projects are categorically exempt from California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. In its nine applications, Charter requested categorical exemption from CEQA and provided the Commission with its plan to use limited construction and installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles. Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the nine projects are categorically exempt from CEQA review. These nine projects meet the criteria of the CEQA categorical exemptions as described in CEQA Guidelines, 14 C.C.R. §§ 15301 (Existing facilities), and 15303 (New Construction or Conversion of Small Structures) and therefore, the entirety of the nine projects are categorically exempt from CEQA review as further explained in the Appendices to this Letter.

**Charter’s broadband service offering and pricing meet CASF minimum performance criteria.** Charter commits to fixed residential and low-income broadband pricing plans for two years starting from the beginning date of service. Charter will waive all

standard installation<sup>10</sup> and service connection fees in the project areas during the first two years for broadband service customers.

Charter’s current nationwide pricing plans for broadband services are provided below in Table 3

**Table 3: Charter Broadband Pricing Plans**

<b>Download Speed</b>	<b>Upload Speed</b>	<b>Monthly Price</b>
30 Mbps	4 Mbps	\$17.99
200 Mbps	10 Mbps	\$69.99
400 Mbps	20 Mbps	\$89.99
940 Mbps	35 Mbps	\$129.99

The proposed speed offerings (up to 940 Mbps download and up to 35 Mbps upload) exceed the 10/1 minimum performance requirement.

### **III. Funding Level Determination**

Staff analyzed Charter’s nine approved project funding requests and determined Charter should be awarded 100 percent funding for each project for a total of \$8,738,007.87 in CASF Infrastructure Grant funding to cover costs of the nine projects. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018. Table 4 below provides a summary of Charter’s funding requests and Staff recommendations. Table 5 details the maximum possible funding levels available to all applicants. Staff analysis of individual project funding levels are further explained the Appendices to this Letter.

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<sup>10</sup> Standard installations are installations to residences and buildings that are located up to 125 feet from the point of connection to Charter’s existing distribution system.

**Table 4: Recommended Funding for Charter Projects**

<b>Project</b>	<b>Households to be Served</b>	<b>Funding Requested</b>	<b>Staff Funding Recommendation</b>
Brookside Country Club	207	\$848,062.95	100%
Country Meadows Mobile Home Park	295	\$2,120,390.00	100%
El Dorado Estates	160	\$1,445,032.02	100%
Foothill Terrace Mobile Home Village	308	\$444,388.17	100%
Los Alisos and Los Robles Mobile Estates	334	\$1,021,655.13	100%
Monterey Manor Mobile Home Village	87	\$784,322.00	100%
Plaza Village Mobile Estates	163	\$622,810.66	100%
Soboba Springs Mobile Estates	217	\$907,817.00	100%
Villa Montclair Mobile Home Park	62	\$543,529.94	100%
<b>Total</b>	<b>1833</b>	<b>\$8,738,007.87</b>	<b>\$8,738,007.87</b>

**Table 5: Criteria for Project Funding Level**

<b>Funding Criteria</b>	<b>Maximum Possible Funding Level</b>
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	40%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	20%
<b>Total Funding Level<sup>11</sup></b>	<b>100%</b>

<sup>11</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services, emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. Community support for each of Charter’s nine approved projects are further explained in the Appendices to this Letter.

#### **V. Compliance Requirements**

Charter is required to comply with all the guidelines, requirements, and conditions associated with the grant of CASF funds as specified in D. 18-12-018. Such compliance includes, but is not limited to, the items noted below.

##### **A. Deployment Schedule**

The Commission expects Charter to complete its nine approved projects within 12 months from the start date and Charter has committed to do so. Charter proposes to complete the approved projects as detailed in Table 6. If Charter is unable to complete the approved project within the below timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

**Table 6: Proposed Deployment Schedule for Charter’s Approved Projects**

<b>Project</b>	<b>Deployment Schedule in Days</b>
Brookside Country Club	301
Country Meadows Mobile Home Park	271
El Dorado Estates	256
Foothill Terrace Mobile Home Village	301
Los Alisos and Los Robles Mobile Estates	316
Monterey Manor Mobile Home Village	246
Plaza Village Mobile Estates	266
Soboba Springs Mobile Estates	266
Villa Montclair Mobile Home Park	241

##### **B. Execution and Performance**

Staff and Charter shall determine an individual start date for each of these nine projects after Charter has obtained the necessary project approvals. The Commission may

terminate any of these nine grants should Charter or any contractor it retains fail to commence work by the designated date, upon five days written notice to Charter. In the event that Charter fails to complete a project in accordance with the terms of the Commission's approval as set forth in this Letter, Charter shall reimburse some or all of the CASF funds that it has received for the terminated project. Charter must complete construction for all nine projects covered by the grant on or before the grant's termination date.

#### C. Letter of Credit

The Commission exempts Certificate of Public Convenience and Necessity (CPCN) holders from providing a letter of credit, on the basis that the company submitted a performance bond to the Commission to maintain its CPCN and that the Commission has other means to enforce compliance. In its applications, Charter provided proof of CPCN registration and therefore is exempt from providing a letter of credit.

#### D. Project Audit

The Commission has the right to conduct any necessary audit, verification, and discovery during implementation/construction of any of these nine projects to ensure that CASF funds are spent in accordance with Commission approval. Any of the Charter invoices, for each of these nine projects, submitted for payment will be subject to a financial audit by the Commission at any time within three years of completion of the work.

#### E. Providing Voice Service

Charter will provide voice service, via fixed interconnected VoIP which meets the Federal Communications Commission (FCC) standards for E-911 service and battery backup, in each of these nine approved project areas.

#### F. Reporting

Charter must submit biannual progress reports on the status of each of these nine projects irrespective of requests for reimbursement or payment. Progress reports shall use the schedule for deployment, major construction milestones and costs submitted in these nine project proposals. Charter will indicate the actual date of completion of each task/milestone as well as problems and issues encountered, the actions taken to resolve these problems and issues during project implementation and construction, and will identify future risks to the individual projects.

Before full payment of each project, Charter must submit a project completion report. Charter shall also include test results on the download and upload speeds by census block in the final completion reports. Charter must certify that each progress report is true and correct under penalty of perjury.

#### G. Submission of Form 477

The FCC currently requires broadband providers to semiannually submit Form 477, which includes speed data. While there is an imperfect match between the data that is reported in Form 477 and data relevant to the CASF program, the Form 477 data will be useful in documenting CASF deployment for the service provider's new service. Pursuant to General Order 66-C, service providers in California must submit a copy of their Form 477 data directly to the Commission, concurrent with their submission of the same data to the FCC, for a five-year period after completion of the project.<sup>12</sup>

#### H. Prevailing Wage

Section 1720 of the California Labor Code specifies that CASF-subsidized projects are subject to prevailing wage requirements. Charter has committed to follow state prevailing wage requirements with regards to these nine projects.

### **VI. Payments to CASF Recipients**

The Commission may reimburse Charter's expense for each of these nine projects in accordance with Pub. Util. Code § 281(f)(11). Details of reimbursable expenses are in Appendix 11.

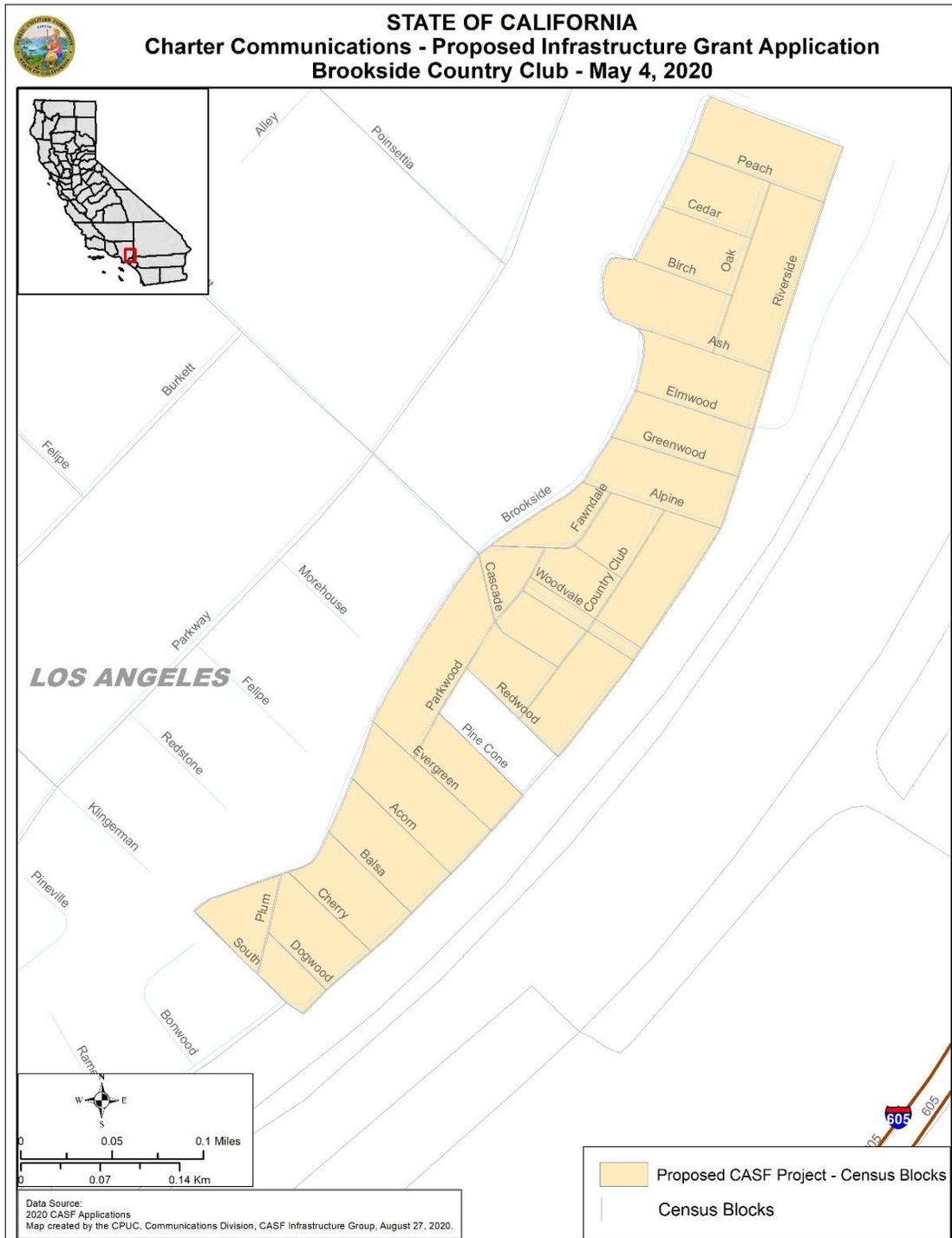
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<sup>12</sup> Approval of the California Advanced Services Fund (CASF) Application Requirements and Scoring Criteria for Awarding CASF Funds (2008) Cal. P.U.C. Res. No. T-17143 at 4.

**APPENDIX 2-A**  
**Charter Communications Brookside - Country Club Project**  
**CASF Applicant Key Information**

<i>Project Name</i>	<b>Brookside Country Club Project</b>		
<i>Project Plan</i>	Charter proposes to deploy 4.96 miles of last-mile coaxial and fiber infrastructure for the Brookside Country Club project (a mobile home park). The area is currently unserved.		
<i>Project Size (in square miles)</i>	0.04		
<i>Download/Upload speed</i>	940 Mbps / 35 Mbps		
<i>Location</i>	El Monte (Los Angeles County)		
<i>Community Names</i>	Brookside Country Club		
<i>Census Blocks</i>	060374340012003 060374340012005 060374340012007 060374340012015 060374340012004 060374340012008 060374340012027 060374340012018 060374340012024	060374340012017 060374340012002 060374340012012 060374340012023 060374340012011 060374340012025 060374340012028 060374340012016 060374340012013	060374340012020 060374340012010 060374340012029 060374340012019 060374340012009 060374340012026 060374340012014 060374340012006
<i>Median Household Income (by Census Block Group)</i>	\$45,417		
<i>Estimated potential subscriber size</i>	207 households		
<i>Applicant expectations</i>	97 households (47% take rate)		
<i>Pricing Plan (Monthly)</i>	30 Mbps / 4 Mbps for \$17.99 200 Mbps / 10 Mbps for \$69.99 400 Mbps / 20 Mbps for \$89.99 940 Mbps / 35 Mbps for \$129.99		
<i>Deployment Schedule (from permit approval date)</i>	301 days		
<i>Proposed Project Budget (Total)</i>	\$848,062.95		
<i>Grant Requested Amount (100 percent)</i>	\$848,062.95		
<i>CASF Grant Amount (100 percent)</i>	\$848,062.95		
<i>Recommended Grant per household passed</i>	\$4,096.92		

## Appendix 2-B Charter Communications - Brookside Country Club Project Project Location Map



**Appendix 2-C**  
**Charter Communications - Brookside Country Club Project**  
**Project Discussion**

**BACKGROUND**

On May 4, 2020, Charter submitted a CASF Infrastructure application for its proposed Brookside Country Club project, requesting funding of \$933,562.95 to deploy 9.01 miles of fiber and coaxial last-mile broadband access to 243 unserved housing units in Brookside Country Club, a mobile home park in the City of El Monte in Los Angeles County, California. The proposed project will provide broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

**DISCUSSION**

In compliance with D.18-12-018, Staff determined that Charter’s proposed Brookside Country Club project is eligible for a CASF Infrastructure Grant in the amount of \$848,062.95. An overview of Staff analyses for this and nine other Charter proposed projects is provided in the body of this Resolution; this Appendix, 2-C, provides a detailed breakdown of Staff analysis of the following sections of the proposed Brookside Country Club Project:

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

**I. Project Area Eligibility**

On August 7, 2020, Staff directed Charter to revise its original application in which Charter proposed to enable High Speed Internet services to 243 eligible housing units requesting \$933,562.95 in grant funding to deliver “service to these CASF eligible households”. Only unserved households are eligible for CASF Infrastructure grants. The proposed Brookside project was subsequently revised to serve 207 households at a total cost of \$848,062.95; material application changes are presented in Table 1 below.

**Table 1: Revisions for Service Connections, Miles and Requested Funding**

Proposed Eligible HU	Revised Eligible HH	Original Miles	Revised Miles	Original Funding Request	Revised Funding Request
243	207	9.01	4.96	\$933,562.95	\$848,062.95

**II. Minimum Performance Criteria**

**Table 2: Minimum Performance Criteria**

	CASF Performance Criteria	Proposed Projects
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Less than 12 months CEQA Exempt

**Charter’s proposed Brookside Country Club project is categorically exempt from the California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. For the proposed Brookside Country Club project, Charter provided the Commission with its plan to use limited construction with installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles.

Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the project is categorically exempt from CEQA review. This project is covered by the Class 1 Categorical Exemption under Section 15301 of the CEQA Guidelines and the Class 3 Categorical Exemption under Section 15303 of the CEQA Guidelines (Title 14 of the California Code of Regulations, §§ 15301, 15303). The Class 1 Categorical Exemption covers minor alterations to existing facilities (including streets and utility facilities) involving negligible or no expansion of existing or former use. The Class 3 Categorical Exemption covers installation of small facilities and equipment (including utility extensions and street improvements). Therefore, the entirety of the project is categorically exempt from CEQA review as explained below.

The proposed Brookside Country Club project would involve installation of fiber optic and coaxial cable on existing utility poles, under existing roadways, and within an

existing mobile home community. The project will install approximately 0.11 miles of aerial cable on existing utility poles. Within the mobile home community, the project will install approximately 4.85 miles of underground cable as distribution and for lateral connections to individual homes. Underground cable would be installed in new conduit beneath existing roadways and within the mobile home community.

### **III. Funding Determination**

Table 3 provides a comparison of Charter’s funding requests and Staff’s recommendations.

**Table 3: Summary of Charter’s Brookside Country Club Proposed Project Funding**

<b>Project</b>	<b>Funding Request</b>	<b>Staff Recommendation</b>	<b>Percentage</b>
Brookside Country Club	\$848,062.95	\$848,062.95	100%

Staff analyzed the proposed Brookside Country Club project funding request and determined Charter should be awarded a total of \$848,062.95 in CASF Infrastructure Grant funding to cover costs of the project. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018.

Table 4 below summarizes the funding level determination for the proposed project.

**Table 4: Criteria for Project Funding Level**

Funding Criteria	Maximum Possible Funding Level
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	30%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	0%
<b>Total Funding Level<sup>13</sup></b>	<b>100%</b>

Details of the appropriate funding level are described below.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified community of Brookside Country Club meets all the eligibility criteria, as previously described in the Project Area Eligibility section of this Resolution.

**Service Level Preference qualifies for an additional 40 percent funding.** Pub. Util. Code § 281(b)(2)(B)(i) encourages the Commission to give preference to projects in areas with no Internet connectivity or where Internet connectivity is available only through dial-up service and are not served by any form of wireline or wireless facility-based broadband service. According to the California Interactive Broadband Map, all the proposed project areas are unserved by wireline or fixed wireless broadband service. Therefore, this project qualifies for additional funding pursuant to the Service Level Preference criterion.

**Low Income considerations qualify for an additional 30 percent funding.** The median household income of the census block group in the proposed project area

<sup>13</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

is \$45,418, which is well below the \$52,400 threshold of the Commission's Alternate Rates for Energy program (CARE) and qualifies the project for an additional 30 percent funding.

Charter has not committed to offer discounted broadband plans at \$14.99 per month and is therefore not eligible for an additional 10 percent funding for the proposed Brookside Country Club project.

**Other Factor considerations do not qualify for additional funding.** The proposed Brookside Country Club Project does not meet any of the additional criteria defined in Pub. Util. Code Sec 281 (f)(12) and therefore does not qualify for additional funding.

Staff determined the proposed project does not meet the inaccessible location criteria and is not eligible for an additional 10 percent funding. The proposed project is located in the City of El Monte in Los Angeles County. The surrounding areas are densely populated with developed access to highways, public utilities, and community health and educational resources. Staff considers the project area to be relatively flat terrain with feasible access including Charter's existing infrastructure.

Staff determined that the proposed project does not primarily leverage existing infrastructure and is not eligible for an additional 10 percent funding. The proposed project requires new coaxial and or fiber to be constructed in new conduit facilities; therefore, it does not qualify for additional funding under the "Uses Existing Infrastructure" criteria.

Staff determined the project does not qualify for an additional 10 percent funding for contributing to the program goal because the local broadband consortium has already met the CASF goal. The Los Angeles County Regional Broadband Consortium region, to which the community of Brookside Country Club belongs, is at 98.9 percent<sup>14</sup> of households served, which is above the CASF program goal of 98 percent.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services, emergency services, and to allow first responders to communicate with each other and

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<sup>14</sup> See 2019 Annual Report on the CASF Program, issued April 2020, page 13.

collaborate during emergencies. There are no anchor institutions or other public facilities that will be served as part of the project, but Charter has submitted letters of support from two community organizations, one Assembly member and one Senator.

**V. Compliance Requirements**

A. Deployment Schedule

The Commission has confirmed Charter’s assertion that the project is CEQA exempt and expects Charter to complete the proposed project within 12 months from the start date (after Charter has secured all required permits), and the Charter has committed to do so. If Charter is unable to complete the proposed project within the 12-month timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

**Table 5: Proposed Deployment Schedule for Charter’s Proposed Project**

Project	Deployment Schedule in Days
Brookside Country Club	301

**APPENDIX 3-A**  
**Charter Communications - Country Meadows Mobile Home Park Project**  
**CASF Applicant Key Information**

<i>Project Name</i>	<b>Country Meadows Project</b>		
<i>Project Plan</i>	Charter proposes to deploy 6.10 miles of last-mile coaxial and fiber infrastructure for the Country Meadows Mobile Home Park project. The area is currently unserved.		
<i>Project Size (in square miles)</i>	0.063		
<i>Download/Upload speed</i>	940 Mbps / 35 Mbps		
<i>Location</i>	Ontario (San Bernardino County)		
<i>Community Names</i>	Country Meadows		
<i>Census Blocks</i>	060710018092013	060710018092002	060710018092003
	060710018092009	060710018092008	060710018092004
	060710018092005	060710018092006	060710018092007
	060710018092011	060710018092014	
<i>Median Household Income (by Census Block Group)</i>	\$45,742		
<i>Estimated potential subscriber size</i>	295 households		
<i>Applicant expectations</i>	131 households (44% take rate)		
<i>Pricing Plan (Monthly)</i>	30 Mbps / 4 Mbps for \$17.99 200 Mbps / 10 Mbps for \$69.99 400 Mbps / 20 Mbps for \$89.99 940 Mbps / 35 Mbps for \$129.99		
<i>Deployment Schedule (from permit approval date)</i>	271 to 236 days		
<i>Proposed Project Budget (Total)</i>	\$2,120,39.00		
<i>Grant Requested Amount (100 percent)</i>	\$2,120,39.00		
<i>CASF Grant Amount (100 percent)</i>	\$2,120,39.00		
<i>Recommended Grant per household passed</i>	\$7,187.76		

# Appendix 3-B

## Charter Communications - Country Meadows Mobile Home Park Project

### Project Location Map



**Appendix 3-C**  
**Charter Communications - Country Meadows Mobile Home Park**  
**Project Discussion**

**BACKGROUND**

On May 4, 2020, Charter submitted a CASF Infrastructure application for its proposed Country Meadows Mobile Home Park project, requesting funding of \$2,165,514.85 to deploy 7.39 miles of fiber and coaxial last-mile broadband access to 314 unserved housing units in Country Meadows Mobile Home Park (hereafter referred to as Country Meadows) in the City of Ontario, in San Bernardino County, California. The proposed project will enable broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

**DISCUSSION**

In compliance with D.18-12-018, Staff determined that Charter’s proposed Country Meadows project is eligible for a CASF Infrastructure Grant in the amount of \$2,120,390.85. An overview of Staff analyses for this and nine other Charter proposed projects is provided in the body of this Resolution; this Appendix, 3-C, provides a detailed breakdown of Staff analysis of the following sections of the proposed Country Meadows Project:

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

**I. Project Area Eligibility**

On August 7, 2020, Staff directed Charter to revise its original application in which Charter proposed to enable High Speed Internet services to 314 eligible housing units and requested \$2,165,514.85 in grant funding to deliver “service to these CASF eligible households”. Only unserved households are eligible for CASF Infrastructure grants. The proposed Country Meadows project was subsequently revised to serve 295 households at a total cost of \$2,120,390.85; material application changes are presented in Table 1 below.

**Table 1: Revisions for Service Connections, Miles and Requested Funding**

Proposed Eligible HU	Revised Eligible HH	Original Miles	Revised Miles	Original Funding Request	Revised Funding Request
314	295	7.39	6.10	\$2,165,514.85	\$2,120,390.85

**II. Minimum Performance Criteria**

**Table 2: Minimum Performance Criteria**

	CASF Performance Criteria	Proposed Projects
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Less than 12 months CEQA Exempt

**Charter’s proposed Country Meadows project is categorically exempt from the California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. For the proposed Country Meadows project, Charter provided the Commission with its plan to use limited construction and installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles.

Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the proposed project is categorically exempt from CEQA review. This project is covered by the Class 1 Categorical Exemption under Section 15301 of the CEQA Guidelines and the Class 3 Categorical Exemption under Section 15303 of the CEQA Guidelines (Title 14 of the California Code of Regulations, §§ 15301, 15303). The Class 1 Categorical Exemption covers minor alterations to existing facilities (including streets and utility facilities) involving negligible or no expansion of existing or former use. The Class 3 Categorical Exemption covers installation of small facilities and equipment (including utility extensions and street improvements). Therefore, the entirety of the project is categorically exempt from CEQA review as explained below.

The proposed Country Meadows project would involve installation of approximately 6.10 miles of fiber optic and coaxial cable in underground trenches or aerial infrastructure, along existing roadways and within an existing mobile home

community. The project will install approximately 3.31 miles of cable (mostly or entirely underground) to connect the mobile home community to the tie-in point and as distribution throughout the community, and approximately 2.79 miles of underground lateral connections to individual homes within the community. Any aerial cable would be placed on existing utility poles where feasible. Underground cable would be installed in new conduit underground beneath existing roadways and within the mobile home community.

**III. Funding Determination**

Table 3 provides a comparison of Charter’s funding requests and Staff’s recommendations.

**Table 3: Summary of Charter’s Country Meadows Proposed Project Funding**

<b>Project</b>	<b>Funding Request</b>	<b>Staff Recommendation</b>	<b>Percentage</b>
Country Meadows	\$2,120,390.85	\$2,120,390.85	100%

Staff analyzed the proposed Country Meadows project funding request and determined Charter should be awarded a total of \$2,120,390.85 in CASF Infrastructure Grant funding to cover costs of the project. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018.

Table 4 below summarizes the funding level determination for the proposed project.

**Table 4: Criteria for Project Funding Level**

Funding Criteria	Maximum Possible Funding Level
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	30%  0%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	0% 0% 10%
<b>Total Funding Level<sup>15</sup></b>	<b>100%</b>

Details of the appropriate funding level are described below.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified community of Country Meadows meets all the eligibility criteria, as previously described in the Project Area Eligibility section of this Resolution.

**Service Level Preference qualifies for an additional 40 percent funding.** Pub. Util. Code § 281(b)(2)(B)(i) encourages the Commission to give preference to projects in areas with no Internet connectivity or where Internet connectivity is available only through dial-up service that are not served by any form of wireline or wireless facility-based broadband service. According to the California Interactive Broadband Map, all the proposed project areas are unserved by wireline or fixed wireless broadband service. Therefore, this project qualifies for the additional funding based on the Service Level Preference criterion.

<sup>15</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

**Low Income considerations qualify for an additional 30 percent funding.** The median household income of the census block group in the proposed project area is \$45,742, which is well below the \$52,400 threshold of the Commission’s Alternate Rates for Energy program (CARE) and qualifies the project for an additional 30 percent funding.

Charter has not committed to offer discounted broadband plans at \$14.99 per month and is therefore not eligible for an additional 10 percent funding for the proposed Country Meadows project.

**Other Factor considerations qualify for some additional funding.** The proposed Country Meadows Project meets one of the three additional criteria defined in Pub. Util. Code Sec 281 (f)(12) and therefore qualifies for an additional 10 percent funding.

Staff determined the proposed project does not meet the inaccessible location criteria and is not eligible for an additional 10 percent funding. The proposed project is located in Ontario, San Bernardino County CA. The project area is surrounded on three sides by densely populated developed areas with access to highways, public utilities, and community health and educational resources; one side is bordered by farmland. Staff considers the project area to be relatively flat terrain with feasible access including Charter’s existing infrastructure.

Staff determined that the proposed project does not primarily leverage existing infrastructure and is not eligible for an additional 10 percent funding. The proposed project requires new coaxial and or fiber to be constructed in new conduit facilities; therefore, it does not qualify for additional funding under the “Uses Existing Infrastructure” criteria.

Staff determined the project makes a significant contribution to the program goal and is eligible for an additional 10 percent funding. The Inland Empire Regional Broadband Consortium, to which the community of Country Meadows belongs, is at 96.9 percent<sup>16</sup> of households served, which is below the CASF program goal of 98 percent.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services,

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<sup>16</sup> See 2019 Annual Report on the CASF Program, issued April 2020, page 13.

emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. There are no anchor institutions or other public facilities that will be served as part of the project, but Charter has submitted letters of support from multiple community organizations, government entities, and educational facilities.

**V. Compliance Requirements**

**A. Deployment Schedule**

The Commission has confirmed Charter’s assertion that the project is CEQA exempt and expects Charter to complete the proposed project within 12 months from the start date (after Charter has secured all required permits), and the Charter has committed to do so. If Charter is unable to complete the proposed project within the 12-month timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

**Table 5: Proposed Deployment Schedule for Charter’s Proposed Project**

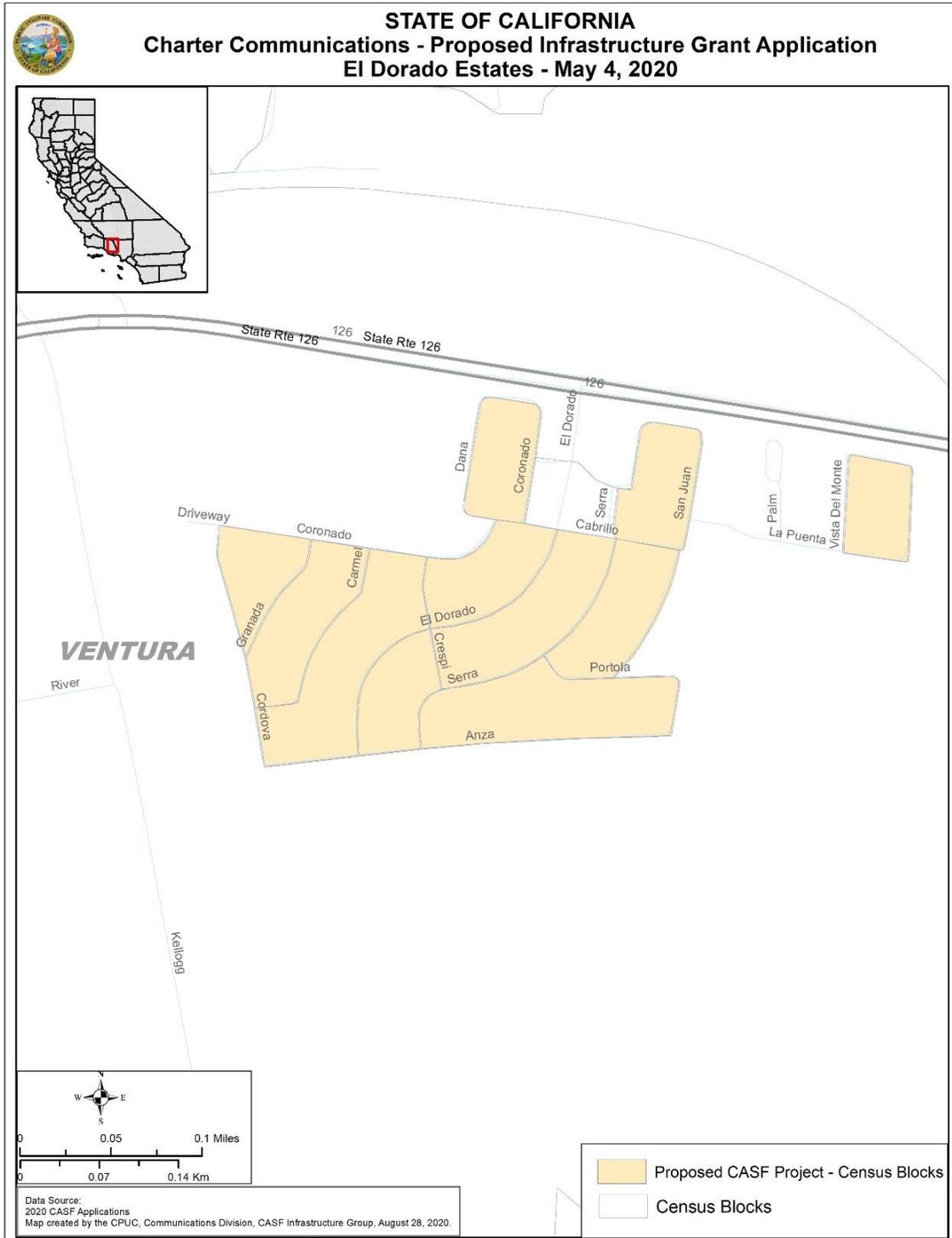
<b>Project</b>	<b>Deployment Schedule in Days</b>
Country Meadows	271

**APPENDIX 4-A**  
**Charter Communications - El Dorado Estates Mobile Home Park Project**  
**CASF Applicant Key Information**

<i>Project Name</i>	<b>El Dorado Estates Mobile Home Park</b>		
<i>Project Plan</i>	Charter proposes to deploy 3.92 miles of underground coaxial plant infrastructure for the El Dorado Estates Mobile Home Park project. The area is currently unserved.		
<i>Project Size (in square miles)</i>	0.032		
<i>Download/Upload speed</i>	940 Mbps / 35 Mbps		
<i>Location</i>	Fillmore (Ventura County)		
<i>Community Names</i>	El Dorado Estates Mobile Home Park		
<i>Census Blocks</i>	061110003021023 061110003021013 061110003021009 061110003021010	061110003021018 061110003021014 061110003021017 061110003021015	061110003021019 061110003021022 061110003021183
<i>Median Household Income (by Census Block Group)</i>	\$44,483		
<i>Estimated potential subscriber size</i>	160 households		
<i>Applicant expectations</i>	80 households (50% take rate)		
<i>Pricing Plan (Monthly)</i>	30 Mbps / 4 Mbps for \$17.99 200 Mbps / 10 Mbps for \$69.99 400 Mbps / 20 Mbps for \$89.99 940 Mbps / 35 Mbps for \$129.99		
<i>Deployment Schedule (from permit approval date)</i>	256 to-225 days		
<i>Proposed Project Budget (Total)</i>	\$1,445,032.02		
<i>Grant Requested Amount (100 percent)</i>	\$1,445,032.02		
<i>CASF Grant Amount (100 percent)</i>	\$1,445,032.02		
<i>Recommended Grant per household passed</i>	\$9,031.45		

# Appendix 4-B

## Charter Communications - El Dorado Estates Mobile Home Park Project Location Map



**Appendix 4-C**  
**Charter Communications - El Dorado Estates Mobile Home Park**  
**Project Discussion**

**BACKGROUND**

On May 4, 2020, Charter submitted a CASF Infrastructure application for its proposed El Dorado Estates Mobile Home Park project, requesting funding of \$1,477,032.02 to deploy 4.21 miles of fiber and coaxial last-mile broadband access to 192 unserved housing units in El Dorado Estates Mobile Home Park (hereafter referred to as El Dorado Estates) in the City of Fillmore, Ventura County, California. The proposed project will enable broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

**DISCUSSION**

In compliance with D.18-12-018, Staff determined that Charter’s proposed El Dorado Estates project is eligible for a CASF Infrastructure Grant in the amount of \$1,445,032.02. An overview of Staff analyses for this and nine other Charter proposed projects is provided in the body of this Resolution; this Appendix, 4-C, provides a detailed breakdown of Staff analysis of the following sections of the proposed El Dorado Estates Project:

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

**I. Project Area Eligibility**

On August 7, 2020, Staff directed Charter to revise its original application in which Charter proposed to enable High Speed Internet services to 192 eligible housing units and requested \$1,477,032.02 in grant funding to deliver “service to these CASF eligible households”. Only unserved households are eligible for CASF Infrastructure grants. The proposed El Dorado Estates project was subsequently revised to serve 160 households at a total cost of \$1,445,032.02; material application changes are presented in Table 1 below.

**Table 1: Revisions for Service Connections, Miles and Requested Funding**

Proposed Eligible HU	Revised Eligible HH	Original Miles	Revised Miles	Original Funding Request	Revised Funding Request
192	160	4.21	3.92	\$1,477,032.02	\$1,445,032.02

**II. Minimum Performance Criteria**

**Table 2: Minimum Performance Criteria**

	CASF Performance Criteria	Proposed Projects
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Less than 12 months CEQA Exempt

**Charter’s proposed El Dorado Estates project is categorically exempt from the California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. For the proposed El Dorado Estates project, Charter provided the Commission with its plan to use limited construction and installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles.

Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the proposed project is categorically exempt from CEQA review. This project is covered by the Class 1 Categorical Exemption under Section 15301 of the CEQA Guidelines and the Class 3 Categorical Exemption under Section 15303 of the CEQA Guidelines (Title 14 of the California Code of Regulations, §§ 15301, 15303). The Class 1 Categorical Exemption covers minor alterations to existing facilities, and the Class 3 Categorical Exemption covers installation of small facilities and equipment. Therefore, the entirety of the project is categorically exempt from CEQA review as explained below.

The proposed El Dorado Estates project site is an existing residential development that abuts State Route 126 (E. Telegraph Road) in the City of Fillmore. The project would install approximately 80 feet of aerial infrastructure along existing utility poles, within an existing, approved coaxial trunk that crosses over the SR 126 roadway. The project would install approximately 2.41 miles of coaxial plant underground within the

residential community along existing streets, and approximately 1.51 miles of laterals from the existing streets to provide connections to the individual households. The project also would install equipment along the existing streets and homes in the residential community, within previously disturbed right-of-way and established utility easements.

**III. Funding Determination**

Table 3 provides a comparison of Charter’s funding requests and Staff’s recommendations.

**Table 3: Summary of Charter’s El Dorado Estates Proposed Project Funding**

<b>Project</b>	<b>Funding Request</b>	<b>Staff Recommendation</b>	<b>Percentage</b>
El Dorado Estates	\$1,445,032.02	\$1,445,032.02	100%

Staff analyzed the proposed El Dorado Estates project funding request and determined Charter should be awarded a total of \$1,445,032.02 in CASF Infrastructure Grant funding to cover costs of the project. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018.

Table 4 below summarizes the funding level determination for the proposed project.

**Table 4: Criteria for Project Funding Level**

Funding Criteria	Maximum Possible Funding Level
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	30%  0%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	0% 0% 10%
<b>Total Funding Level<sup>17</sup></b>	<b>100%</b>

Details of the appropriate funding level are described below.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified community of El Dorado Estates meets all the eligibility criteria, as previously described in the Project Area Eligibility section of this Resolution.

**Service Level Preference qualifies for an additional 40 percent funding.** Pub. Util. Code § 281(b)(2)(B)(i) encourages the Commission to give preference to projects in areas with no Internet connectivity or where Internet connectivity is available only through dial-up service that are not served by any form of wireline or wireless facility-based broadband service. According to the California Interactive Broadband Map, all the proposed project areas are unserved by wireline or fixed wireless broadband service. Therefore, this project qualifies for the additional funding based on the Service Level Preference criterion.

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<sup>17</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

**Low Income considerations qualify for an additional 30 percent funding.** The median household income of the census block group in the proposed project area is \$44,483, which is well below the \$52,400 threshold of the Commission’s Alternate Rates for Energy program (CARE) and qualifies the project for an additional 30 percent funding.

Charter has not committed to offer discounted broadband plans at \$14.99 per month and is therefore not eligible for an additional 10 percent funding for the proposed El Dorado Estates project.

**Other Factor considerations qualify for some additional funding.** The proposed El Dorado Estates Project meets one of the three additional criteria defined in Pub. Util. Code Sec 281 (f)(12) and therefore qualifies for an additional 10 percent funding.

Staff determined the proposed project does not meet the inaccessible location criteria and is not eligible for an additional 10 percent funding. The project, while bordered by mountains and farmland on three sides is in the densely populated City of Fillmore, Ventura County with developed areas with access to highways, public utilities, and community health and educational resources. Staff considers the project area to be relatively flat terrain with feasible access including Charter’s existing infrastructure.

Staff determined that the proposed project does not primarily leverage existing infrastructure and is not eligible for an additional 10 percent funding. The proposed project requires new coaxial and or fiber to be constructed in new conduit facilities; therefore, it does not qualify for additional funding under the “Uses Existing Infrastructure” criteria.

Staff determined the project makes a significant contribution to the program goal and is eligible for an additional 10 percent funding. The Broadband Consortium of the Pacific Coast, to which the community of El Dorado Estates belongs, is at 97.3 percent<sup>18</sup> of households served, which is below the CASF program goal of 98 percent.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services,

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<sup>18</sup> See 2019 Annual Report on the CASF Program, issued April 2020, page 13.

emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. There are no anchor institutions or other public facilities that will be served as part of the project, but Charter has submitted letters of support from three community organizations, the Broadband Consortium of the Pacific Coast and one member of the State Assembly.

**V. Compliance Requirements**

**A. Deployment Schedule**

The Commission has confirmed Charter’s assertion that the project is CEQA exempt and expects Charter to complete the proposed project within 12 months from the start date (after Charter has secured all required permits), and the Charter has committed to do so. If Charter is unable to complete the proposed project within the 12-month timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

**Table 5: Proposed Deployment Schedule for Charter’s Proposed Projects**

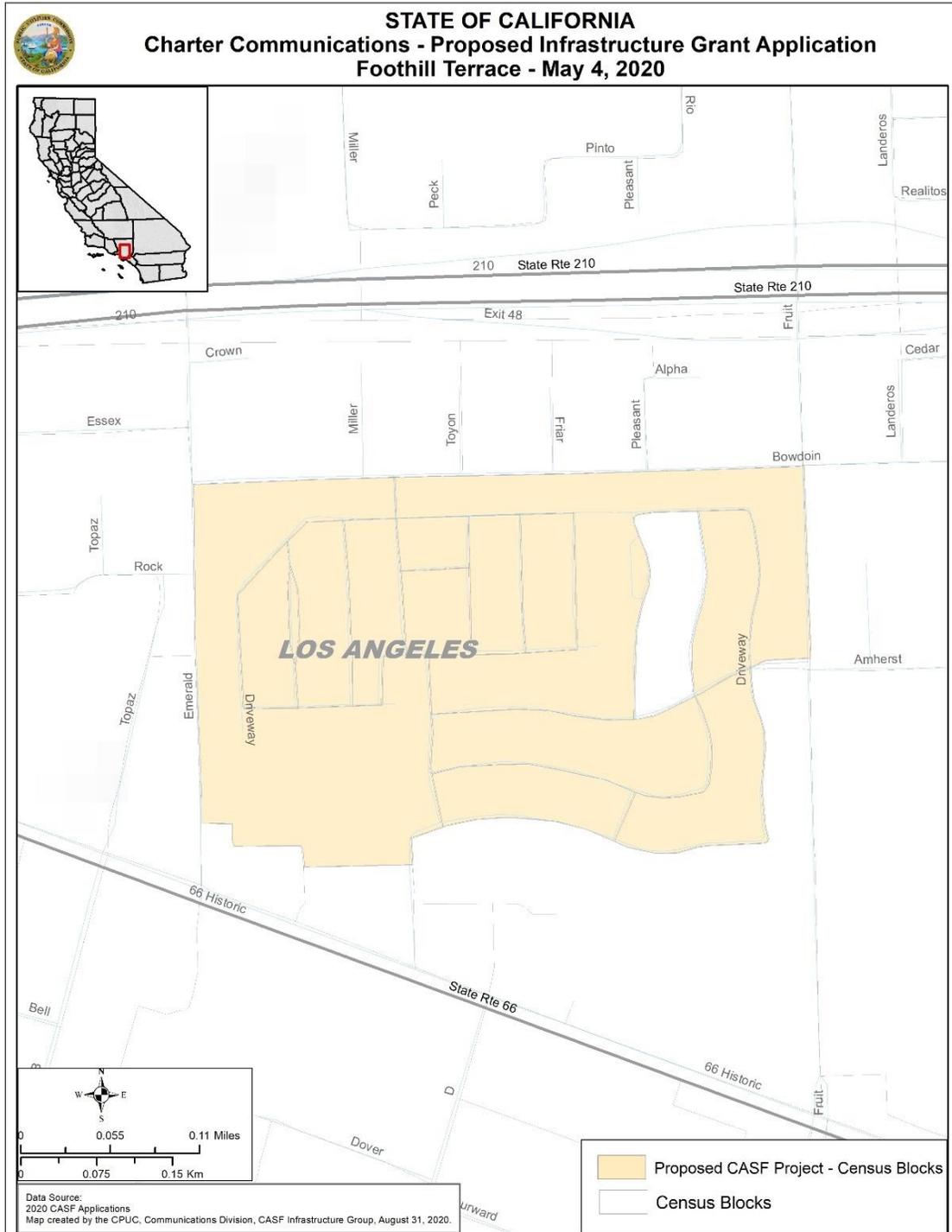
<b>Project</b>	<b>Deployment Schedule in Days</b>
El Dorado Estates	256

**APPENDIX 5-A**  
**Charter Communications - Foothill Terrace Mobile Home Village Project**  
**CASF Applicant Key Information**

<i>Project Name</i>	<b>Foothill Terrace Mobile Home Village</b>		
<i>Project Plan</i>	Charter proposes to deploy 5.06 miles of underground plant extension infrastructure and laterals for the Foothill Terrace Mobile Home Village project. The area is currently unserved.		
<i>Project Size (in square miles)</i>	0.07		
<i>Download/Upload speed</i>	940 Mbps / 35 Mbps		
<i>Location</i>	La Verne, California (Los Angeles County)		
<i>Community Names</i>	Foothill Terrace Mobile Home Village		
<i>Census Blocks</i>	060374016011016	060374016011012	060374016011010
	060374016011018	060374016011009	060374016011022
	060374016011030	060374016011011	060374016011029
	060374016011019	060374016011013	060374016011020
	060374016011017	060374016011008	
<i>Median Household Income (by Census Block Group)</i>	\$26,087		
<i>Estimated potential subscriber size</i>	308 households		
<i>Applicant expectations</i>	136 households (44% take rate)		
<i>Pricing Plan (Monthly)</i>	30 Mbps / 4 Mbps for \$17.99 200 Mbps / 10 Mbps for \$69.99 400 Mbps / 20 Mbps for \$89.99 940 Mbps / 35 Mbps for \$129.99		
<i>Deployment Schedule (from permit approval date)</i>	301 to-295 days		
<i>Proposed Project Budget (Total)</i>	\$444,388.17		
<i>Grant Requested Amount (100 percent)</i>	\$444,388.17		
<i>CASF Grant Amount (100 percent)</i>	\$444,388.17		
<i>Recommended Grant per household passed</i>	\$1,442.81		

# Appendix 5-B

## Charter Communications - Foothill Terrace Mobile Home Village Project Location Map



**Appendix 5-C**  
**Charter Communications - Foothill Terrace Mobile Home Village**  
**Project Discussion**

**BACKGROUND**

On May 4, 2020, Charter submitted a CASF Infrastructure application for its proposed Foothill Terrace Mobile Home Village project, requesting funding of \$489,513.17 to deploy 6.37 miles of fiber and coaxial last-mile broadband access to 327 unserved housing units in Foothill Terrace Mobile Home Village (hereafter referred to as Foothill Terrace) in the City of La Verne, Los Angeles County, California. The proposed project will enable broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

**DISCUSSION**

In compliance with D.18-12-018, Staff determined that Charter’s proposed Foothill Terrace project is eligible for a CASF Infrastructure Grant in the amount of \$444,388.17. An overview of Staff analyses for this and nine other Charter proposed projects is provided in the body of this Resolution; this Appendix, 5-C, provides a detailed breakdown of Staff analysis of the following sections of the proposed Foothill Terrace project:

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

**I. Project Area Eligibility**

On August 7, 2020, Staff directed Charter to revise its original application in which Charter proposed to enable High Speed Internet services to 327 eligible housing units and requested \$489,513.17 in grant funding to deliver “service to these CASF eligible households”. Only unserved households are eligible for CASF Infrastructure grants. The proposed Foothill Terrace project was subsequently revised to serve 308 households at a total cost of \$444,388.17; material application changes are presented in Table 1 below.

**Table 1: Revisions for Service Connections, Miles and Requested Funding**

Proposed Eligible HU	Revised Eligible HH	Original Miles	Revised Miles	Original Funding Request	Revised Funding Request
327	308	6.37	5.06	\$489,513.17	\$444,388.17

**II. Minimum Performance Criteria**

**Table 2: Minimum Performance Criteria**

	CASF Performance Criteria	Proposed Projects
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Less than 12 months CEQA Exempt

**Charter’s proposed Foothill Terrace project is categorically exempt from the California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. For the proposed Foothill Terrace project, Charter provided the Commission with its plan to use limited construction and installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles.

Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the proposed project is categorically exempt from CEQA review. This project is covered by the Class 1 Categorical Exemption under Section 15301 of the CEQA Guidelines and the Class 3 Categorical Exemption under Section 15303 of the CEQA Guidelines (Title 14 of the California Code of Regulations, §§ 15301, 15303). The Class 1 Categorical Exemption covers minor alterations to existing facilities (including streets and utility facilities) involving negligible or no expansion of existing or former use. The Class 3 Categorical Exemption covers installation of small facilities and equipment (including utility extensions and street improvements). Therefore, the entirety of the project is categorically exempt from CEQA review as explained below.

The proposed Foothill Terrace project would involve installation of fiber optic and coaxial cable in underground trenches along existing roadways and within an existing

mobile home community. New conduits will be placed underground along existing roadways and will contain underground lateral connections to individual homes. The project will install approximately 2.14 miles of underground cable to connect the mobile home community to the tie-in point and as distribution throughout the community, and approximately 2.92 miles of underground cable for lateral connections to individual homes.

**III. Funding Determination**

Table 3 provides a comparison of Charter’s funding requests and Staff’s recommendations.

**Table 3: Summary of Charter’s Foothill Terrace Proposed Project Funding**

Project	Funding Request	Staff Recommendation	Percentage
Foothill Terrace	\$444,388.17	\$444,388.17	100%

Staff analyzed the proposed Foothill Terrace project funding request and determined Charter should be awarded a total of \$444,388.17 in CASF Infrastructure Grant funding to cover costs of the project. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018.

Table 4 below summarizes the funding level determination for the proposed project.

**Table 4: Criteria for Project Funding Level**

Funding Criteria	Maximum Possible Funding Level
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	30%  0%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	0% 0% 0%
<b>Total Funding Level<sup>19</sup></b>	<b>100%</b>

Details of the appropriate funding level are described below.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified community of Foothill Terrace meets all the eligibility criteria, as previously described in the Project Area Eligibility section of this Resolution.

**Service Level Preference qualifies for an additional 40 percent funding.** Pub. Util. Code § 281(b)(2)(B)(i) encourages the Commission to give preference to projects in areas with no Internet connectivity or where Internet connectivity is available only through dial-up service that are not served by any form of wireline or wireless facility-based broadband service. According to the California Interactive Broadband Map, all the proposed project areas are unserved by wireline or fixed wireless broadband service. Therefore, this project qualifies for the additional funding based on the Service Level Preference criterion.

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<sup>19</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

**Low Income considerations qualify for an additional 30 percent funding.** The median household income of the census block group in the proposed project area is \$26,087, which is well below the \$52,400 threshold of the Commission’s Alternate Rates for Energy program (CARE) and qualifies the project for an additional 30 percent funding.

Charter has not committed to offer discounted broadband plans at \$14.99 per month and is therefore not eligible for an additional 10 percent funding for the proposed Foothill Terrace project.

**Other Factor considerations do not qualify for additional funding.** The proposed Foothill Terrace Project does not meet any of the three additional criteria defined in Pub. Util. Code Sec 281 (f)(12) and therefore does not qualify for an additional 10 percent funding.

Staff determined the proposed project does not meet the inaccessible location criteria and is not eligible for an additional 10 percent funding. The proposed project is located in the City of La Verne, Los Angeles County, CA. The surrounding areas are densely populated with developed access to highways, public utilities, and community health and educational resources. Staff considers the project area to be relatively flat terrain with feasible access including Charter’s existing infrastructure.

Staff determined that the proposed project does not primarily leverage existing infrastructure and is not eligible for an additional 10 percent funding. The proposed project requires new coaxial and or fiber to be constructed in new conduit facilities; therefore, it does not qualify for additional funding under the “Uses Existing Infrastructure” criteria.

Staff determined the project does not make a significant contribution to the program goal and is not eligible for an additional 10 percent funding. The Los Angeles County Regional Broadband Consortium, to which the community of Foothill Terrace belongs, is at 98.9 percent<sup>20</sup> households served, which is above the CASF program goal of 98 percent.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services,

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<sup>20</sup> See 2019 Annual Report on the CASF Program, issued April 2020, page 13.

emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. There are no anchor institutions or other public facilities that will be served as part of the project, but Charter has submitted letters of support from three community organizations.

**V. Compliance Requirements**

**A. Deployment Schedule**

The Commission has confirmed Charter’s assertion that the project is CEQA exempt and expects Charter to complete the proposed project within 12 months from the start date (after Charter has secured all required permits), and the Charter has committed to do so. If Charter is unable to complete the proposed project within the 12-month timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

**Table 5: Proposed Deployment Schedule for Charter’s Proposed Project**

<b>Project</b>	<b>Deployment Schedule in Days</b>
Foothill Terrace	301

**APPENDIX 6-A**

**Charter Communications - Los Alisos and Los Robles Mobile Estates Project CASF  
Applicant Key Information**

<i>Project Name</i>	<b>Los Alisos and Los Robles Mobile Estates Project</b>																					
<i>Project Plan</i>	Charter proposes to deploy 8.19 miles of underground plant extension infrastructure and laterals for the Los Alisos and Los Robles Mobile Estates project. The area is currently unserved.																					
<i>Project Size (in square miles)</i>	0.064																					
<i>Download/Upload speed</i>	940 Mbps / 35 Mbps																					
<i>Location</i>	Westminster, California, (Orange County)																					
<i>Community Names</i>	Los Alisos and Los Robles Mobile Estates																					
<i>Census Blocks</i>	<table border="0"> <tr> <td>060590999051015</td> <td>060590999051034</td> <td>060590999051016</td> </tr> <tr> <td>060590999051021</td> <td>060590999051010</td> <td>060590999051020</td> </tr> <tr> <td>060590999051025</td> <td>060590999051017</td> <td>060590999051022</td> </tr> <tr> <td>060590999051033</td> <td>060590999051013</td> <td>060590999051023</td> </tr> <tr> <td>060590999051012</td> <td>060590999051035</td> <td>060590999051026</td> </tr> <tr> <td>060590999051019</td> <td>060590999051011</td> <td>060590999052003</td> </tr> <tr> <td>060590999051024</td> <td>060590999051018</td> <td></td> </tr> </table>	060590999051015	060590999051034	060590999051016	060590999051021	060590999051010	060590999051020	060590999051025	060590999051017	060590999051022	060590999051033	060590999051013	060590999051023	060590999051012	060590999051035	060590999051026	060590999051019	060590999051011	060590999052003	060590999051024	060590999051018	
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060590999051019	060590999051011	060590999052003																				
060590999051024	060590999051018																					
<i>Weighted Median Household Income (by Census Block Group)<sup>21</sup></i>	\$57,475.31																					
<i>Estimated potential subscriber size</i>	334 households																					
<i>Applicant expectations</i>	188 households (41.68% take rate)																					
<i>Pricing Plan (Monthly)</i>	30 Mbps / 4 Mbps for \$17.99 200 Mbps / 10 Mbps for \$69.99 400 Mbps / 20 Mbps for \$89.99 940 Mbps / 35 Mbps for \$129.99																					
<i>Deployment Schedule (from permit approval date)</i>	316 to-295 days																					
<i>Proposed Project Budget (Total)</i>	\$1,021,655.13																					
<i>Grant Requested Amount (100 percent)</i>	\$1,021,655.13																					
<i>CASF Grant Amount (100 percent)</i>	\$1,021,655.13																					
<i>Recommended Grant per household passed</i>	\$3,890.80																					

<sup>21</sup> Staff performed a weighted average calculation of the census block group median household incomes to accurately represent the income distribution of the households in the project area.



**Appendix 6-C**  
**Charter Communications - Los Alisos and Los Robles Mobile Estates Project**  
**Project Discussion**

**BACKGROUND**

On May 4, 2020, Charter submitted a CASF Infrastructure application for its proposed Los Alisos and Los Robles Mobile Estates project, requesting funding of \$1,299,530.13 to deploy 13.9 miles of fiber and coaxial last-mile broadband access to 451 unserved housing units in Los Alisos and Los Robles Mobile Estates (hereafter referred to as Los Alisos) in the City of Westminster, Orange County, California. The proposed project will enable broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

**DISCUSSION**

In compliance with D.18-12-018, Staff determined that Charter’s proposed Los Alisos project is eligible for a CASF Infrastructure Grant in the amount of \$1,021,655.13. An overview of Staff analyses for this and nine other Charter proposed projects is provided in the body of this Resolution; this Appendix, 6-C, provides a detailed breakdown of Staff analysis of the following sections of the proposed Los Alisos project:

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

**I. Project Area Eligibility**

On August 7, 2020, Staff directed Charter to revise its original application in which Charter proposed to enable High Speed Internet services to 451 eligible housing units and requested \$1,299,530.13 in grant funding to deliver “service to these CASF eligible households”. Only unserved households are eligible for CASF Infrastructure grants. The proposed Los Alisos and Los Robles Mobile Estates projects were subsequently revised to serve 334 households at a total cost of \$1,021,655.13; material application changes are presented in Table 1 below.

**Table 1: Revisions for Service Connections, Miles and Requested Funding**

Proposed Eligible HU	Revised Eligible HH	Original Miles	Revised Miles	Original Funding Request	Revised Funding Request
451	334	13.9	8.19	\$1,299,530.13	\$1,021,655.13

**II. Minimum Performance Criteria**

**Table 2: Minimum Performance Criteria**

	CASF Performance Criteria	Proposed Projects
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Less than 12 months CEQA Exempt

**Charter’s proposed Los Alisos project is categorically exempt from the California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. For the proposed Los Alisos project, Charter provided the Commission with its plan to use limited construction and installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles.

Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the proposed project is categorically exempt from CEQA review. This project is covered by the Class 1 Categorical Exemption under Section 15301 of the CEQA Guidelines and the Class 3 Categorical Exemption under Section 15303 of the CEQA Guidelines (Title 14 of the California Code of Regulations, §§ 15301, 15303). The Class 1 Categorical Exemption covers minor alterations to existing facilities, and the Class 3 Categorical Exemption covers installation of small facilities and equipment. Therefore, the entirety of the project is categorically exempt from CEQA review as explained below.

The proposed Los Alisos and Los Robles Mobile Estates project would involve installation of fiber optic and coaxial cable on existing utility poles, under existing roadways, and within two existing mobile home communities. The project will install approximately 0.08 miles of aerial cable on existing utility poles. The project will install approximately 8.11 miles of underground cable in new conduit in utility trenches

beneath existing roadways within the Los Alisos and Los Robles mobile home communities (including 4.66 miles of underground lateral connections to individual homes).

**III. Funding Determination**

Table 3 provides a comparison of Charter’s funding requests and Staff’s recommendations.

**Table 3: Summary of Charter’s Los Alisos Proposed Project Funding**

<b>Project</b>	<b>Funding Request</b>	<b>Staff Recommendation</b>	<b>Percentage</b>
Los Alisos Estates and Los Robles Mobile Estates	\$1,021,655.13	\$1,021,655.13	100%

Staff analyzed the proposed Los Alisos project funding request and determined Charter should be awarded a total of \$1,021,655.13 in CASF Infrastructure Grant funding to cover costs of the project. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018.

Table 4 below summarizes the funding level determination for the proposed project.

**Table 4: Criteria for Project Funding Level**

Funding Criteria	Maximum Possible Funding Level
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	0%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	0%
<b>Total Funding Level<sup>22</sup></b>	<b>100%</b>

Details of the appropriate funding level are described below.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified community of Los Alisos meets all the eligibility criteria, as previously described in the Project Area Eligibility section of this Resolution.

**Service Level Preference qualifies for an additional 40 percent funding.** Pub. Util. Code § 281(b)(2)(B)(i) encourages the Commission to give preference to projects in areas with no Internet connectivity or where Internet connectivity is available only through dial-up service that are not served by any form of wireline or wireless facility-based broadband service. According to the California Interactive Broadband Map, all the proposed project areas are unserved by wireline or fixed wireless broadband service. Therefore, this project qualifies for the additional funding based on the Service Level Preference criterion.

<sup>22</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

**Low Income considerations do not qualify for an additional 30 percent funding.** The median household income for Los Alisos is \$53,636 and \$92,344 for Los Robles Mobile Estates. The weighted median household income for the two census block groups in the proposed project areas is \$57,475.31 which is slightly above the \$52,400 threshold of the Commission’s Alternate Rates for Energy program (CARE). Therefore, the proposed project does not qualify for an additional 30 percent funding.

Charter has not committed to offer discounted broadband plans at \$14.99 per month and is therefore not eligible for an additional 10 percent funding for the proposed Foothill Terrace project.

**Other Factor considerations qualify for additional 10 percent funding.** The proposed Los Alisos Project meets one of the three additional criteria defined in Pub. Util. Code Sec 281 (f)(12) and therefore qualifies for an additional 10 percent funding.

Staff determined the proposed project does not meet the inaccessible location criteria and is not eligible for an additional 10 percent funding. The proposed project is located in the City of Westminster in Orange County, CA. The surrounding areas are densely populated with developed access to highways, public utilities, and community health and educational resources. Staff considers the project area to be relatively flat terrain with feasible access including Charter’s existing infrastructure.

Staff determined that the proposed project does not primarily leverage existing infrastructure and is not eligible for an additional 10 percent funding. The proposed project requires new coaxial and or fiber to be constructed in new conduit facilities; therefore, it does not qualify for additional funding under the “Uses Existing Infrastructure” criteria.

Staff determined the project does make a significant contribution to the program goal and is eligible for an additional 10 percent funding. The Orange County Regional Broadband Consortium, to which the communities of Los Alisos and Los Robles Mobile Estates belong, is at 95.6 percent<sup>23</sup> households served, which is below the CASF program goal of 98 percent.

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<sup>23</sup> See 2019 Annual Report on the CASF Program, issued April 2020, page 13.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services, emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. There are no anchor institutions or other public facilities that will be served as part of the project, but Charter has submitted letters of support from six community organizations, one member of the State Assembly and one State Senator.

#### **V. Compliance Requirements**

##### **A. Deployment Schedule**

The Commission has confirmed Charter's assertion that the project is CEQA exempt and expects Charter to complete the proposed project within 12 months from the start date (after Charter has secured all required permits), and the Charter has committed to do so. If Charter is unable to complete the proposed project within the 12-month timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

**Table 5: Proposed Deployment Schedule for Charter's Proposed Project**

<b>Project</b>	<b>Deployment Schedule in Days</b>
Los Alisos and Los Robles Mobile Estates	316

**APPENDIX 7-A**  
**Charter Communications - Monterey Manor Mobile Home Village Project**  
**CASF Applicant Key Information**

<i>Project Name</i>	<b>Monterey Manor Mobile Home Village</b>		
<i>Project Plan</i>	Charter proposes to deploy 2.75 miles of underground plant extension infrastructure and laterals for the Monterey Manor Mobile Home Village project. The area is currently unserved.		
<i>Project Size (in square miles)</i>	0.018		
<i>Download/Upload speed</i>	940 Mbps / 35 Mbps		
<i>Location</i>	Montclair (San Bernardino County)		
<i>Community Names</i>	Monterey Manor Mobile Home Village		
<i>Census Blocks</i>	060710003034006 060710003034003	060710003034007 060710003034001	060710003034008 060710003034004
<i>Median Household Income (by Census Block Group)</i>	\$55,368		
<i>Estimated potential subscriber size</i>	87 households		
<i>Applicant expectations</i>	38 households (43.67% take rate)		
<i>Pricing Plan (Monthly)</i>	30 Mbps / 4 Mbps for \$17.99 200 Mbps / 10 Mbps for \$69.99 400 Mbps / 20 Mbps for \$89.99 940 Mbps / 35 Mbps for \$129.99		
<i>Deployment Schedule (from permit approval date)</i>	246 to 211 days		
<i>Proposed Project Budget (Total)</i>	\$784,322.00		
<i>Grant Requested Amount (100 percent)</i>	\$784,322.00		
<i>CASF Grant Amount (100 percent)</i>	\$784,322.00		
<i>Recommended Grant per household passed</i>	\$9,015.19		

# Appendix 7-B

## Charter Communications - Monterey Manor Mobile Home Village Project Location Map



**Appendix 7-C**  
**Charter Communications - Monterey Manor Mobile Home Village Project**  
**Project Discussion**

**BACKGROUND**

On May 4, 2020, Charter submitted a CASF Infrastructure application for its proposed Monterey Manor Mobile Home Village project, requesting funding of \$796,197.79 to deploy 3.26 miles of fiber and coaxial last-mile broadband access to 92 unserved housing units in the Monterey Manor Mobile Home Village (hereafter referred to as Monterey Manor) in the City of Montclair, San Bernardino County, California. The proposed project will enable broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

**DISCUSSION**

In compliance with D.18-12-018, Staff determined that Charter’s proposed Monterey Manor project is eligible for a CASF Infrastructure Grant in the amount of \$784,322.00. An overview of Staff analyses for this and nine other Charter proposed projects is provided in the body of this Resolution; this Appendix, 7-C, provides a detailed breakdown of Staff analysis of the following sections of the proposed Monterey Manor project:

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

**I. Project Area Eligibility**

On August 7, 2020, Staff directed Charter to revise its original application in which Charter proposed to enable High Speed Internet services to 92 eligible housing units and requested \$796,197.79 in grant funding to deliver “service to these CASF eligible households”. Only unserved households are eligible for CASF Infrastructure grants. The proposed Monterey Manor project was subsequently revised to serve 87 households at a total cost of \$784,322.00; material application changes are presented in Table 1 below.

**Table 1: Revisions for Service Connections, Miles and Requested Funding**

Proposed Eligible HU	Revised Eligible HH	Original Miles	Revised Miles	Original Funding Request	Revised Funding Request
92	87	3.26	2.75	\$796,197.79	\$784,322.00

**II. Minimum Performance Criteria**

**Table 2: Minimum Performance Criteria**

	CASF Performance Criteria	Proposed Projects
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Less than 12 months CEQA Exempt

**Charter’s proposed Monterey Manor project is categorically exempt from the California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. For the proposed Monterey Manor project, Charter provided the Commission with its plan to use limited construction and installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles.

Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the proposed project is categorically exempt from CEQA review. This project is covered by the Class 1 Categorical Exemption under Section 15301 of the CEQA Guidelines and the Class 3 Categorical Exemption under Section 15303 of the CEQA Guidelines (Title 14 of the California Code of Regulations, §§ 15301, 15303). The Class 1 Categorical Exemption covers minor alterations to existing facilities (including streets and utility facilities) involving negligible or no expansion of existing or former use. The Class 3 Categorical Exemption covers installation of small facilities and equipment (including utility extensions and street improvements). Therefore, the entirety of the project is categorically exempt from CEQA review as explained below.

The proposed Monterey Manor project would involve installation of fiber optic and coaxial cable in underground trenches or aerial infrastructure, along existing roadways and within an existing mobile home community. The project will install approximately 0.1 miles of aerial cable (on existing utility poles where feasible); approximately 1.83

miles of cable would be installed underground along existing roadways to connect the mobile home community and approximately 0.82 miles of cable would be installed underground for lateral connections to individual homes within the mobile home community.

**III. Funding Determination**

Table 3 provides a comparison of Charter’s funding requests and Staff’s recommendations.

**Table 3: Summary of Charter’s Monterey Manor Proposed Project Funding**

Project	Funding Request	Staff Recommendation	Percentage
Monterey Manor Mobile Home Village	\$784,322.00	\$784,322.00	100%

Staff analyzed the proposed Monterey Manor project funding request and determined Charter should be awarded a total of \$784,322.00 in CASF Infrastructure Grant funding to cover costs of the project. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018.

Table 4 below summarizes the funding level determination for the proposed project.

**Table 4: Criteria for Project Funding Level**

Funding Criteria	Maximum Possible Funding Level
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	0%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	0%
<b>Total Funding Level<sup>24</sup></b>	<b>100%</b>

Details of the appropriate funding level are described below.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified community of Monterey Manor meets all the eligibility criteria, as previously described in the Project Area Eligibility section of this Resolution.

**Service Level Preference qualifies for an additional 40 percent funding.** Pub. Util. Code § 281(b)(2)(B)(i) encourages the Commission to give preference to projects in areas with no Internet connectivity or where Internet connectivity is available only through dial-up service that are not served by any form of wireline or wireless facility-based broadband service. According to the California Interactive Broadband Map, all the proposed project areas are unserved by wireline or fixed wireless broadband service. Therefore, this project qualifies for the additional funding based on the Service Level Preference criterion.

<sup>24</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

**Low Income considerations do not qualify for an additional 30 percent funding.** The median household income of the census block group in the proposed project area is \$55,368, which is above the \$52,400 threshold of the Commission’s Alternate Rates for Energy program (CARE). Therefore, the proposed project does not qualify for an additional 30 percent funding.

Charter has not committed to offer discounted broadband plans at \$14.99 per month and is therefore not eligible for an additional 10 percent funding for the proposed Monterey Manor project.

**Other Factor considerations qualify for additional 10 percent funding.** The proposed Los Alisos Project meets one of the three additional criteria defined in Pub. Util. Code Sec 281 (f)(12) and therefore qualifies for an additional 10 percent funding.

Staff determined the proposed project does not meet the inaccessible location criteria and is not eligible for an additional 10 percent funding. The proposed project is located in the City of Montclair in San Bernardino County, CA. The surrounding areas are densely populated with developed access to highways, public utilities, and community health and educational resources. Staff considers the project area to be relatively flat terrain with feasible access including Charter’s existing infrastructure.

Staff determined that the proposed project does not primarily leverage existing infrastructure and is not eligible for an additional 10 percent funding. The proposed project requires new coaxial and or fiber to be constructed in new conduit facilities; therefore, it does not qualify for additional funding under the “Uses Existing Infrastructure” criteria.

Staff determined the project does make a significant contribution to the program goal and is eligible for an additional 10 percent funding. The Inland Empire Regional Broadband Consortium, to which the community of Monterey Manor belongs, is at 96.9 percent<sup>25</sup> served households, which is below the CASF program goal of 98 percent.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services,

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<sup>25</sup> See 2019 Annual Report on the CASF Program, issued April 2020, page 13.

emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. There are no anchor institutions or other public facilities that will be served as part of the project, but Charter has submitted sixteen letters of support from various sources including the Inland Empire Regional Broadband Consortium, community organizations, school districts, elected officials, and government entities.

**V. Compliance Requirements**

**A. Deployment Schedule**

The Commission has confirmed Charter’s assertion that the project is CEQA exempt and expects Charter to complete the proposed project within 12 months from the start date (after Charter has secured all required permits), and the Charter has committed to do so. If Charter is unable to complete the proposed project within the 12-month timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

**Table 5: Proposed Deployment Schedule for Charter’s Proposed Project**

Project	Deployment Schedule in Days
Monterey Manor Mobile Home Village	246

**APPENDIX 8-A**  
**Charter Communications - Plaza Village Mobile Estates Project**  
**CASF Applicant Key Information**

<i>Project Name</i>	<b>Plaza Village Mobile Estates Project</b>		
<i>Project Plan</i>	Charter proposes to deploy 3.69 miles of mostly underground plant extension infrastructure and laterals for the Plaza Village Mobile Estates project. The area is currently unserved.		
<i>Project Size (in square miles)</i>	0.034		
<i>Download/Upload speed</i>	940 Mbps / 35 Mbps		
<i>Location</i>	Santa Ana (Orange County)		
<i>Community Names</i>	Plaza Village Mobile Estates		
<i>Census Blocks</i>	060590741062005 060590741062006 060590741062007 060590741062003	060590741062004 060590741062048 060590741062065 060590741062064	060590741062063 060590741062050 060590741062049
<i>Median Household Income (by Census Block Group)</i>	\$76,500		
<i>Estimated potential subscriber size</i>	163 households		
<i>Applicant expectations</i>	74 households (45% take rate)		
<i>Pricing Plan (Monthly)</i>	30 Mbps / 4 Mbps for \$17.99 200 Mbps / 10 Mbps for \$69.99 400 Mbps / 20 Mbps for \$89.99 940 Mbps / 35 Mbps for \$129.99		
<i>Deployment Schedule (from permit approval date)</i>	266 to 245 days		
<i>Proposed Project Budget (Total)</i>	\$622,810.66		
<i>Grant Requested Amount (100 percent)</i>	\$622,810.66		
<i>CASF Grant Amount (100 percent)</i>	\$622,810.66		
<i>Recommended Grant per household passed</i>	\$3,820.92		

# Appendix 8-B Charter Communications - Plaza Village Mobile Estates Project Location Map



**Appendix 8-C**  
**Charter Communications - Plaza Village Mobile Estates Project**  
**Project Discussion**

**BACKGROUND**

On May 4, 2020, Charter submitted a CASF Infrastructure application for its proposed Plaza Village Mobile Estates project, requesting funding of \$658,435.66 to deploy 4.92 miles of fiber and coaxial last-mile broadband access to 178 unserved housing units in the Plaza Village Mobile Estates (hereafter referred to as Plaza Village) in the City of Santa Ana, Orange County, California. The proposed project will enable broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

**DISCUSSION**

In compliance with D.18-12-018, Staff determined that Charter’s proposed Plaza Village project is eligible for a CASF Infrastructure Grant in the amount of \$622,810.66. An overview of Staff analyses for this and nine other Charter proposed projects is provided in the body of this Resolution; this Appendix, 8-C, provides a detailed breakdown of Staff analysis of the following sections of the proposed Plaza Village project:

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

**I. Project Area Eligibility**

On August 7, 2020, Staff directed Charter to revise its original application in which Charter proposed to enable High Speed Internet services to 178 eligible housing units and requested \$658,435.66 in grant funding to deliver “service to these CASF eligible households”. Only unserved households are eligible for CASF Infrastructure grants. The proposed Plaza Village project was subsequently revised to serve 163 households at a total cost of \$622,810.66; material application changes are presented in Table 1 below.

**Table 1: Revisions for Service Connections, Miles and Requested Funding**

Proposed Eligible HU	Revised Eligible HH	Original Miles	Revised Miles	Original Funding Request	Revised Funding Request
178	163	5.02	3.69	\$658,435.66	\$622,810.66

**II. Minimum Performance Criteria**

**Table 2: Minimum Performance Criteria**

	CASF Performance Criteria	Proposed Projects
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Less than 12 months CEQA Exempt

**Charter’s proposed Plaza Village project is categorically exempt from the California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. For the proposed Plaza Village project, Charter provided the Commission with its plan to use limited construction and installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles.

Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the proposed project is categorically exempt from CEQA review. This project is covered by the Class 1 Categorical Exemption under Section 15301 of the CEQA Guidelines and the Class 3 Categorical Exemption under Section 15303 of the CEQA Guidelines (Title 14 of the California Code of Regulations, §§ 15301, 15303). The Class 1 Categorical Exemption covers minor alterations to existing facilities (including streets and utility facilities) involving negligible or no expansion of existing or former use. The Class 3 Categorical Exemption covers installation of small facilities and equipment (including utility extensions and street improvements). Therefore, the entirety of the project is categorically exempt from CEQA review as explained below.

The proposed Plaza Village project would involve installation of fiber optic and coaxial cable on existing utility poles, under existing roadways, and within an existing mobile home community. The project will install approximately 0.13 miles of aerial cable on existing utility poles and approximately 3.56 miles of underground cable in new

conduit along existing roadways and within the existing mobile home community (including 1.84 miles of underground lateral connections to individual homes).

### **III. Funding Determination**

Table 3 provides a comparison of Charter’s funding requests and Staff’s recommendations.

**Table 3: Summary of Charter’s Monterey Manor Proposed Project Funding**

<b>Project</b>	<b>Funding Request</b>	<b>Staff Recommendation</b>	<b>Percentage</b>
Plaza Village Mobile Estates	\$622,810.66	\$622,810.66	100%

Staff analyzed the proposed Plaza Village project funding request and determined Charter should be awarded a total of \$622,810.66 in CASF Infrastructure Grant funding to cover costs of the project. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018.

Table 4 below summarizes the funding level determination for the proposed project.

**Table 4: Criteria for Project Funding Level**

Funding Criteria	Maximum Possible Funding Level
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	0%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	0%
<b>Total Funding Level<sup>26</sup></b>	<b>100%</b>

Details of the appropriate funding level are described below.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified community of Plaza Village meets all the eligibility criteria, as previously described in the Project Area Eligibility section of this Resolution.

**Service Level Preference qualifies for an additional 40 percent funding.** Pub. Util. Code § 281(b)(2)(B)(i) encourages the Commission to give preference to projects in areas with no Internet connectivity or where Internet connectivity is available only through dial-up service that are not served by any form of wireline or wireless facility-based broadband service. According to the California Interactive Broadband Map, all the proposed project areas are unserved by wireline or fixed wireless broadband service. Therefore, this project qualifies for the additional funding based on the Service Level Preference criterion.

<sup>26</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

**Low Income considerations do not qualify for an additional 30 percent funding.** The median household income of the census block group in the proposed project area is \$76,500, which is above the \$52,400 threshold of the Commission’s Alternate Rates for Energy program (CARE). Therefore, the proposed project does not qualify for an additional 30 percent funding.

Charter has not committed to offer discounted broadband plans at \$14.99 per month and is therefore not eligible for an additional 10 percent funding for the proposed Plaza Village project.

**Other Factor considerations qualify for additional 10 percent funding.** The proposed Plaza Village Project meets one of the three additional criteria defined in Pub. Util. Code Sec 281 (f)(12) and therefore qualifies for an additional 10 percent funding.

Staff determined the proposed project does not meet the inaccessible location criteria and is not eligible for an additional 10 percent funding. The proposed project is located in the City of Santa Ana in Orange County, CA. The surrounding areas are densely populated with developed access to highways, public utilities, and community health and educational resources. Staff considers the project area to be relatively flat terrain with feasible access including Charter’s existing infrastructure.

Staff determined that the proposed project does not primarily leverage existing infrastructure and is not eligible for an additional 10 percent funding. The proposed project requires new coaxial and or fiber to be constructed in new conduit facilities; therefore, it does not qualify for additional funding under the “Uses Existing Infrastructure” criteria.

Staff determined the project does make a significant contribution to the program goal and is eligible for an additional 10 percent funding. The Orange County Regional Broadband Consortium, to which the community of Plaza Village belongs, is at 95.6 percent<sup>27</sup> households served, which is below the CASF program goal of 98 percent.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services,

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<sup>27</sup> See 2019 Annual Report on the CASF Program, issued April 2020, page 13.

emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. There are no anchor institutions or other public facilities that will be served as part of the project, but Charter has submitted sixteen letters of support from various sources including community organizations, school districts, elected officials, and government entities.

**V. Compliance Requirements**

**A. Deployment Schedule**

The Commission has confirmed Charter’s assertion that the project is CEQA exempt and expects Charter to complete the proposed project within 12 months from the start date (after Charter has secured all required permits), and the Charter has committed to do so. If Charter is unable to complete the proposed project within the 12-month timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

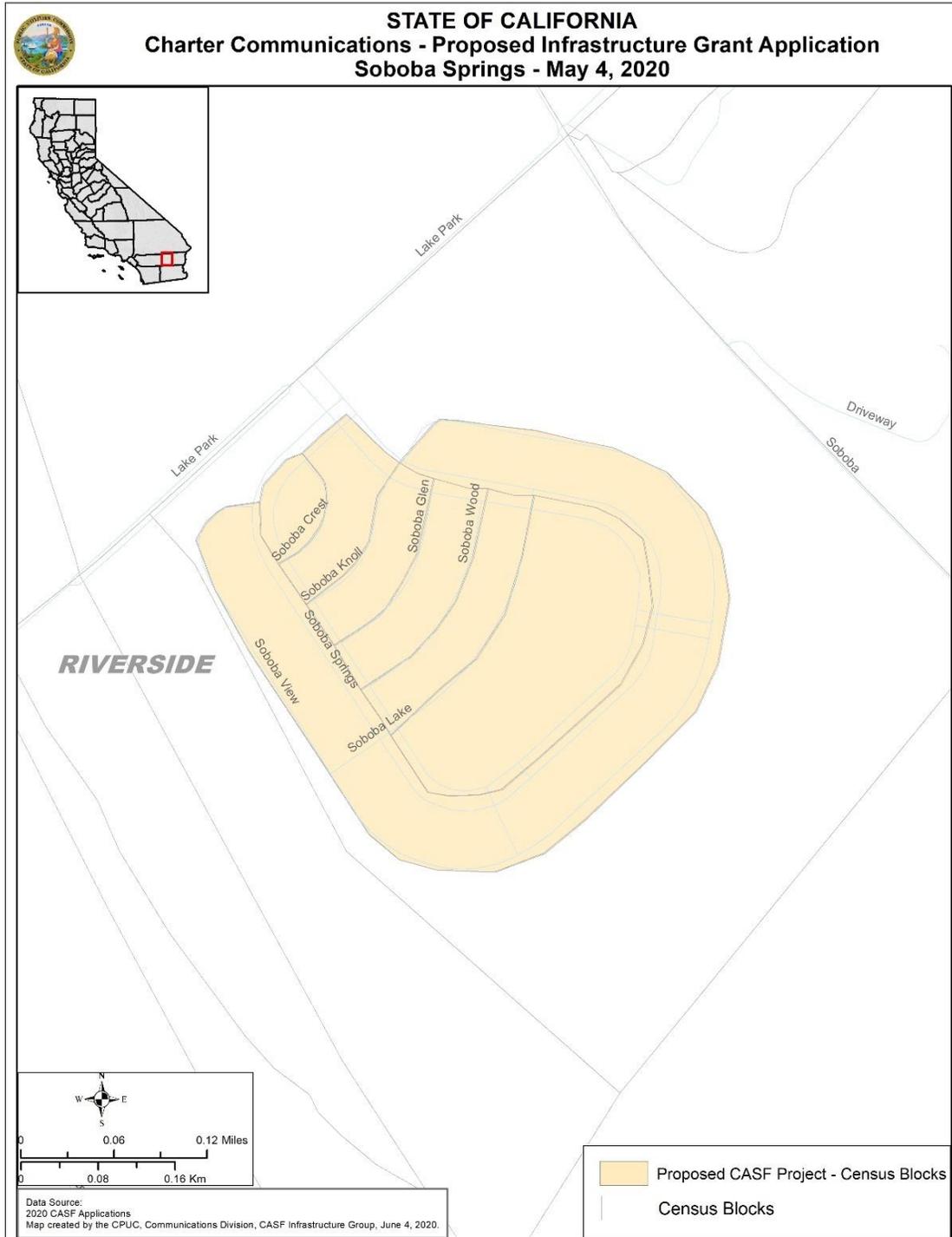
**Table 5: Proposed Deployment Schedule for Charter’s Proposed Project**

<b>Project</b>	<b>Deployment Schedule in Days</b>
Plaza Village Mobile Estates	266

**APPENDIX 9-A**  
**Charter Communications - Soboba Springs Mobile Estates Project**  
**CASF Applicant Key Information**

<i>Project Name</i>	<b>Soboba Springs Mobile Estates Project</b>		
<i>Project Plan</i>	Charter proposes to deploy 3.73 miles of mostly underground plant extension infrastructure and laterals for the Soboba Springs Mobile Estates project. The area is currently unserved.		
<i>Project Size (in square miles)</i>	0.07		
<i>Download/Upload speed</i>	940 Mbps / 35 Mbps		
<i>Location</i>	San Jacinto (Riverside County)		
<i>Community Names</i>	Soboba Springs Mobile Estates		
<i>Census Blocks</i>	060650513001073 060650513001075 060650513001074	060650513001079 060650513001078 060650513001077	060650513001076
<i>Median Household Income (by Census Block Group)</i>	\$48,650		
<i>Estimated potential subscriber size</i>	217 households		
<i>Applicant expectations</i>	104 households (48% take rate)		
<i>Pricing Plan (Monthly)</i>	30 Mbps / 4 Mbps for \$17.99 200 Mbps / 10 Mbps for \$69.99 400 Mbps / 20 Mbps for \$89.99 940 Mbps / 35 Mbps for \$129.99		
<i>Deployment Schedule (from permit approval date)</i>	266 to 231 days		
<i>Proposed Project Budget (Total)</i>	\$907,817.00		
<i>Grant Requested Amount (100 percent)</i>	\$907,817.00		
<i>CASF Grant Amount (100 percent)</i>	\$907,817.00		
<i>Recommended Grant per household passed</i>	\$4,183.48		

# Appendix 9-B Charter Communications - Soboba Springs Mobile Estates Project Location Map



**Appendix 9-C**  
**Charter Communications - Soboba Springs Mobile Estates Project**  
**Project Discussion**

**BACKGROUND**

On May 4, 2020, Charter submitted a CASF Infrastructure application for its proposed Soboba Springs Mobile Estates project, requesting funding of \$983,817.12 to deploy 4.1 miles of fiber and coaxial last-mile broadband access to 249 unserved housing units in the Soboba Springs Mobile Estates mobile home park (hereafter referred to as Soboba Springs) in the City of San Jacinto, Riverside County, California. The proposed project will enable broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

**DISCUSSION**

In compliance with D.18-12-018, Staff determined that Charter’s proposed Soboba Springs project is eligible for a CASF Infrastructure Grant in the amount of \$907,817.00. An overview of Staff analyses for this and nine other Charter proposed projects is provided in the body of this Resolution; this Appendix, 9-C, provides a detailed breakdown of Staff analysis of the following sections of the proposed Soboba Springs project:

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

**I. Project Area Eligibility**

On August 7, 2020, Staff directed Charter to revise its original application in which Charter proposed to enable High Speed Internet services to 249 eligible housing units and requested \$983,817.12 in grant funding to deliver “service to these CASF eligible households”. Only unserved households are eligible for CASF Infrastructure grants. The proposed Soboba Springs project was subsequently revised to serve 217 households at a total cost of \$907,817.00; material application changes are presented in Table 1 below.

**Table 1: Revisions for Service Connections, Miles and Requested Funding**

Proposed Eligible HU	Revised Eligible HH	Original Miles	Revised Miles	Original Funding Request	Revised Funding Request
249	217	4.1	3.73	\$983,817.12	\$907,817.00

**II. Minimum Performance Criteria**

**Table 2: Minimum Performance Criteria**

	CASF Performance Criteria	Proposed Projects
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Less than 12 months CEQA Exempt

**Charter’s proposed Soboba Springs project is categorically exempt from the California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. For the proposed Soboba Springs project, Charter provided the Commission with its plan to use limited construction and installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles.

Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the proposed project is categorically exempt from CEQA review. This project is covered by the Class 1 Categorical Exemption under Section 15301 of the CEQA Guidelines and the Class 3 Categorical Exemption under Section 15303 of the CEQA Guidelines (Title 14 of the California Code of Regulations, §§ 15301, 15303). The Class 1 Categorical Exemption covers minor alterations to existing facilities (including streets and utility facilities) involving negligible or no expansion of existing or former use. The Class 3 Categorical Exemption covers installation of small facilities and equipment (including utility extensions and street improvements). Therefore, the entirety of the project is categorically exempt from CEQA review as explained below.

The proposed Soboba Springs project would involve installation of fiber optic and coaxial cable in underground trenches or aerial infrastructure, along existing roadways and within an existing mobile home community. The project will install approximately 1.68 miles of cable (mostly or entirely underground) and approximately 2.05 miles of

underground lateral connections to individual homes within the community. Any aerial cable would be placed on existing utility poles where feasible. Underground cable would be installed in new conduit underground beneath existing roadways and within the mobile home community. All cable installed within the mobile home community would be underground.

**III. Funding Determination**

Table 3 provides a comparison of Charter’s funding requests and Staff’s recommendations.

**Table 3: Summary of Charter’s Monterey Manor Proposed Project Funding**

<b>Project</b>	<b>Funding Request</b>	<b>Staff Recommendation</b>	<b>Percentage</b>
Soboba Springs Mobile Estates	\$907,817.00	\$907,817.00	100%

Staff analyzed the proposed Soboba Springs project funding request and determined Charter should be awarded a total of \$907,817.00 in CASF Infrastructure Grant funding to cover costs of the project. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018.

Table 4 below summarizes the funding level determination for the proposed project.

**Table 4: Criteria for Project Funding Level**

Funding Criteria	Maximum Possible Funding Level
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	10%  0%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	0% 0% 10%
<b>Total Funding Level<sup>28</sup></b>	<b>100%</b>

Details of the appropriate funding level are described below.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified community of Soboba Springs meets all the eligibility criteria, as previously described in the Project Area Eligibility section of this Resolution.

**Service Level Preference qualifies for an additional 40 percent funding.** Pub. Util. Code § 281(b)(2)(B)(i) encourages the Commission to give preference to projects in areas with no Internet connectivity or where Internet connectivity is available only through dial-up service that are not served by any form of wireline or wireless facility-based broadband service. According to the California Interactive Broadband Map, all the proposed project areas are unserved by wireline or fixed wireless broadband service. Therefore, this project qualifies for the additional funding based on the Service Level Preference criterion.

<sup>28</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

**Low Income considerations qualifies for an additional 30 percent funding.**

The median household income of the census block group in the proposed project area is \$48,650, which is below the \$52,400 threshold of the Commission's Alternate Rates for Energy program (CARE). Therefore, the proposed project qualifies for an additional 30 percent funding.

Charter has not committed to offer discounted broadband plans at \$14.99 per month and is therefore not eligible for an additional 10 percent funding for the proposed Soboba Springs project.

**Other Factor considerations qualify for additional 10 percent funding.** The proposed Soboba Springs project meets one of the three additional criteria defined in Pub. Util. Code Sec 281 (f)(12) and therefore qualifies for an additional 10 percent funding.

Staff determined the proposed project does not meet the inaccessible location criteria and is not eligible for an additional 10 percent funding. The proposed project is located in the City of San Jacinto in Riverside County, CA. The project area is bordered on one side by mountainous terrain; however, the project area is densely populated with developed access to highways, public utilities, and community health and educational resources. Staff considers the project area to be relatively flat terrain with feasible access including Charter's existing infrastructure.

Staff determined that the proposed project does not primarily leverage existing infrastructure and is not eligible for an additional 10 percent funding. The proposed project requires new coaxial and or fiber to be constructed in new conduit facilities; therefore, it does not qualify for additional funding under the "Uses Existing Infrastructure" criteria.

Staff determined the project does make a significant contribution to the program goal and is eligible for an additional 10 percent funding. The Inland Empire Regional Broadband Consortium, to which the community of Soboba Springs belongs, is at 96.9 percent<sup>29</sup> households served, which is below the CASF program goal of 98 percent.

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<sup>29</sup> See 2019 Annual Report on the CASF Program, issued April 2020, page 13.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services, emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. There are no anchor institutions or other public facilities that will be served as part of the project, but Charter has submitted eleven letters of support from various sources including community organizations, the San Bernardino Superintendent of Schools, elected officials, and government entities.

#### **V. Compliance Requirements**

##### **A. Deployment Schedule**

The Commission has confirmed Charter's assertion that the project is CEQA exempt and expects Charter to complete the proposed project within 12 months from the start date (after Charter has secured all required permits), and the Charter has committed to do so. If Charter is unable to complete the proposed project within the 12-month timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

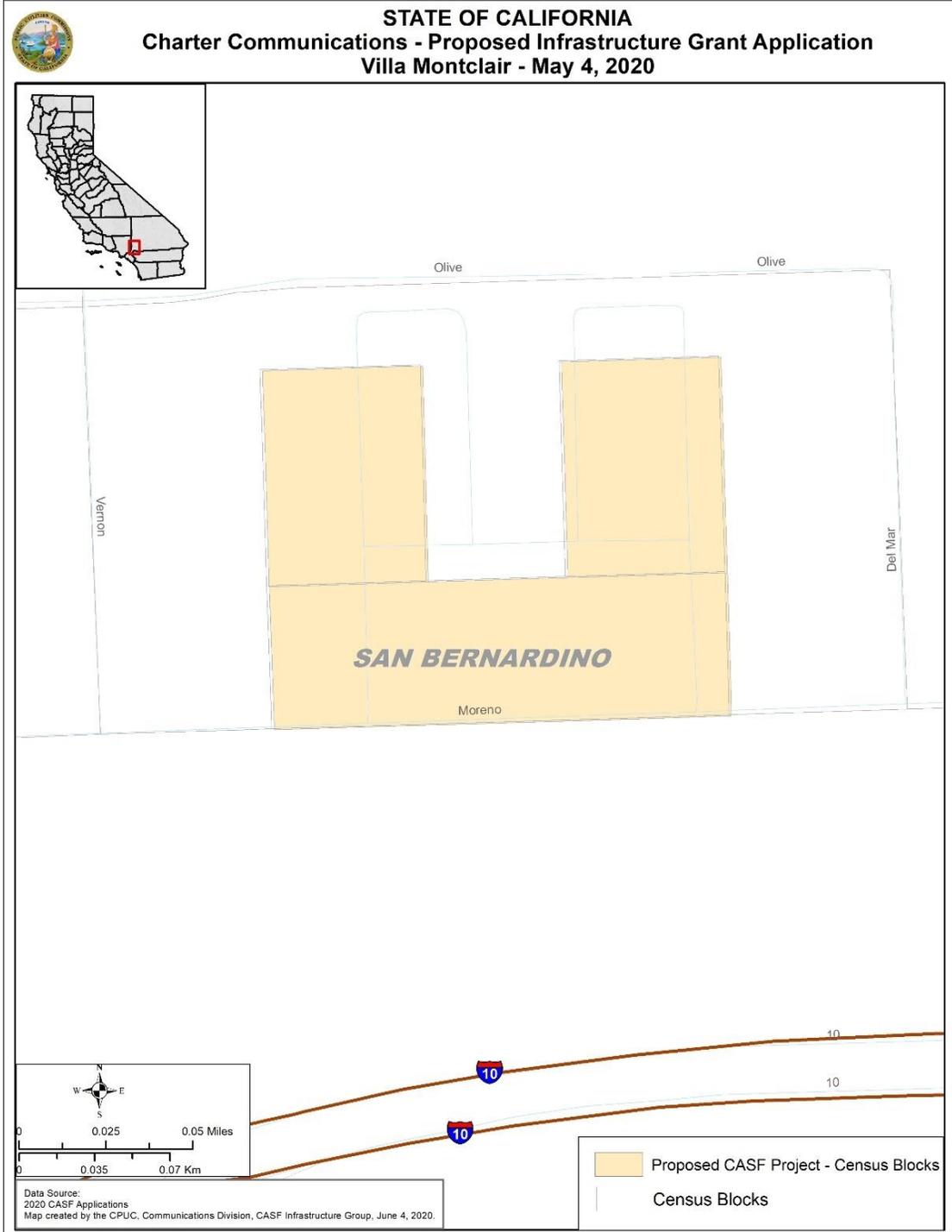
**Table 5: Proposed Deployment Schedule for Charter's Proposed Project**

<b>Project</b>	<b>Deployment Schedule in Days</b>
Plaza Village Mobile Estates	266

**APPENDIX 10-A**  
**Charter Communications - Villa Montclair Mobile Home Park Project**  
**CASF Applicant Key Information**

<i>Project Name</i>	<b>Villa Montclair Mobile Home Park Project</b>
<i>Project Plan</i>	Charter proposes to deploy 1.91 miles of mostly underground plant extension infrastructure and laterals for the Villa Montclair Mobile Home Park project. The area is currently unserved.
<i>Project Size (in square miles)</i>	0.01
<i>Download/Upload speed</i>	940 Mbps / 35 Mbps
<i>Location</i>	Montclair (San Bernardino County)
<i>Community Names</i>	Villa Montclair Mobile Home Park
<i>Census Blocks</i>	060710002012039      060710002012037      060710002012040
<i>Median Household Income (by Census Block Group)</i>	\$55,959
<i>Estimated potential subscriber size</i>	62 households
<i>Applicant expectations</i>	27 households (43.54% take rate)
<i>Pricing Plan (Monthly)</i>	30 Mbps / 4 Mbps for \$17.99 200 Mbps / 10 Mbps for \$69.99 400 Mbps / 20 Mbps for \$89.99 940 Mbps / 35 Mbps for \$129.99
<i>Deployment Schedule (from permit approval date)</i>	241 to 206 days
<i>Proposed Project Budget (Total)</i>	\$543,528.94
<i>Grant Requested Amount (100 percent)</i>	\$543,528.94
<i>CASF Grant Amount (100 percent)</i>	\$543,528.94
<i>Recommended Grant per household passed</i>	\$8,766.59

**Appendix 10-B**  
**Charter Communications - Villa Montclair Mobile Home Park Project**  
**Location Map**



**Appendix 10-C**  
**Charter Communications - Villa Montclair Mobile Home Park Project**  
**Project Discussion**

**BACKGROUND**

On May 4, 2020, Charter submitted a CASF Infrastructure application for its proposed Villa Montclair Mobile Home Park project, requesting funding of \$548,278.94 to deploy 2.2 miles of fiber and coaxial last-mile broadband access to 64 unserved housing units in the Villa Montclair Mobile Home Park (hereafter referred to as Villa Montclair) in the City of Montclair, San Bernardino County, California. The proposed project will enable broadband access at speeds of up to 940 Mbps download and 35 Mbps upload to areas that are currently unserved.

**DISCUSSION**

In compliance with D.18-12-018, Staff determined that Charter’s proposed Villa Montclair project is eligible for a CASF Infrastructure Grant in the amount of \$543,528.94. An overview of Staff analyses for this and nine other Charter proposed projects is provided in the body of this Resolution; this Appendix, 10-C, provides a detailed breakdown of Staff analysis of the following sections of the proposed Villa Montclair project:

- I. Project Eligibility
- II. Minimum Performance Criteria (CEQA Only)
- III. Funding Determination
- IV. Safety and Community Support
- V. Compliance Requirements (Deployment Schedule Only)

**I. Project Area Eligibility**

On August 7, 2020, Staff directed Charter to revise its original application in which Charter proposed to enable High Speed Internet services to 64 eligible housing units and requested \$548,278.94 in grant funding to deliver “service to these CASF eligible households”. Only unserved households are eligible for CASF Infrastructure grants. The proposed Villa Montclair project was subsequently revised to serve 62 households at a total cost of \$543,528.94; material application changes are presented in Table 1 below.

**Table 1: Revisions for Service Connections, Miles and Requested Funding**

Proposed Eligible HU	Revised Eligible HH	Original Miles	Revised Miles	Original Funding Request	Revised Funding Request
64	62	2.2	1.91	\$548,278.94	\$543,528.94

**II. Minimum Performance Criteria**

**Table 2: Minimum Performance Criteria**

	CASF Performance Criteria	Proposed Projects
<b>Project Completion</b>	CEQA-exempt projects must be completed within 12 months, and all other projects shall be completed within 24 months after receiving authorization to construct	Less than 12 months CEQA Exempt

**Charter’s proposed Villa Montclair project is categorically exempt from the California Environmental Quality Act (CEQA) review.** The Commission must conduct environmental review of all CASF projects unless the project is statutorily or categorically exempt pursuant to CEQA. For the proposed Villa Montclair project, Charter provided the Commission with its plan to use limited construction and installation of fiber and supporting facilities within existing public rights-of-way, on already-developed private property and will rely primarily on existing poles.

Based on the information that Charter provided, the Commission’s Energy Division has confirmed that the proposed project is categorically exempt from CEQA review. This project is covered by the Class 1 Categorical Exemption under Section 15301 of the CEQA Guidelines and the Class 3 Categorical Exemption under Section 15303 of the CEQA Guidelines (Title 14 of the California Code of Regulations, §§ 15301, 15303). The Class 1 Categorical Exemption covers minor alterations to existing facilities (including streets and utility facilities) involving negligible or no expansion of existing or former use. The Class 3 Categorical Exemption covers installation of small facilities and equipment (including utility extensions and street improvements). Therefore, the entirety of the project is categorically exempt from CEQA review as explained below.

The proposed Villa Montclair project would involve installation of fiber optic and coaxial cable in underground trenches or aerial infrastructure, along existing roadways and within an existing mobile home community. The project will install approximately 1.32 miles of cable (mostly or entirely underground) and approximately 0.59 miles of

underground lateral connections to individual homes within the community. Any aerial cable would be placed on existing utility poles where feasible. Underground cable would be installed in new conduit beneath existing roadways and within the mobile home community. All cable installed within the mobile home community would be underground.

**III. Funding Determination**

Table 3 provides a comparison of Charter’s funding requests and Staff’s recommendations.

**Table 3: Summary of Charter’s Monterey Manor Proposed Project Funding**

Project	Funding Request	Staff Recommendation	Percentage
Villa Montclair Mobile Home Park	\$543,528.94	\$543,528.94	100%

Staff analyzed the proposed Villa Montclair project funding request and determined Charter should be awarded a total of \$543,528.94 in CASF Infrastructure Grant funding to cover costs of the project. AB 1665 authorizes the Commission to award grants to fund all or a portion of projects and requires that it determine, on a case-by-case basis, the level of funding to be provided. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(12) and 281(b)(2)(B)(i), and CASF program rules adopted in D.18-12-018.

Table 4 below summarizes the funding level determination for the proposed project.

**Table 4: Criteria for Project Funding Level**

Funding Criteria	Maximum Possible Funding Level
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (40%)	40%
Low Income - up to 40% <ul style="list-style-type: none"> <li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$52,400 (30%)</li> <li>• Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	0%  0%
Others: PU Code Sec 281 (f)(12) Criteria - up to 20% <ul style="list-style-type: none"> <li>• Inaccessible Location (10%)</li> <li>• Uses Existing Infrastructure (10%)</li> <li>• Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	0% 0% 10%
<b>Total Funding Level<sup>30</sup></b>	<b>100%</b>

Details of the appropriate funding level are described below.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified community of Villa Montclair meets all the eligibility criteria, as previously described in the Project Area Eligibility section of this Resolution.

**Service Level Preference qualifies for an additional 40 percent funding.** Pub. Util. Code § 281(b)(2)(B)(i) encourages the Commission to give preference to projects in areas with no Internet connectivity or where Internet connectivity is available only through dial-up service that are not served by any form of wireline or wireless facility-based broadband service. According to the California Interactive Broadband Map, all the proposed project areas are unserved by wireline or fixed wireless broadband service. Therefore, this project qualifies for the additional funding based on the Service Level Preference criterion.

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<sup>30</sup> Maximum funding level is 100 percent. See D.18-12-018, Table 1. Summary of Funding Level Determinations.

**Low Income considerations do not qualify for an additional 30 percent funding.** The median household income of the census block group in the proposed project area is \$55,959, which is slightly above the \$52,400 threshold of the Commission’s Alternate Rates for Energy program (CARE). Therefore, the proposed project does not qualify for an additional 30 percent funding.

Charter has not committed to offer discounted broadband plans at \$14.99 per month and is therefore not eligible for an additional 10 percent funding for the proposed Villa Montclair project.

**Other Factor considerations qualify for additional 10 percent funding.** The proposed Villa Montclair project meets one of the three additional criteria defined in Pub. Util. Code Sec 281 (f)(12) and therefore qualifies for an additional 10 percent funding.

Staff determined the proposed project does not meet the inaccessible location criteria and is not eligible for an additional 10 percent funding. The proposed project is located in the City of Montclair in San Bernardino County, CA. The surrounding areas are densely populated with developed access to highways, public utilities, and community health and educational resources. Staff considers the project area to be relatively flat terrain with feasible access including Charter’s existing infrastructure.

Staff determined that the proposed project does not primarily leverage existing infrastructure and is not eligible for an additional 10 percent funding. The proposed project requires new coaxial and or fiber to be constructed in new conduit facilities; therefore, it does not qualify for additional funding under the “Uses Existing Infrastructure” criteria.

Staff determined the project does make a significant contribution to the program goal and is eligible for an additional 10 percent funding. The Inland Empire Regional Broadband Consortium, to which the community of Villa Montclair belongs, is at 96.9 percent<sup>31</sup> households served, which is below the CASF program goal of 98 percent.

#### **IV. Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services, access

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<sup>31</sup> See 2019 Annual Report on the CASF Program, issued April 2020, page 13.

to emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. There are no anchor institutions or other public facilities that will be served as part of the project, but Charter has submitted sixteen letters of support from various sources including community organizations, the Inland Empire Regional Broadband Consortium, school districts, elected officials, and government entities.

**V. Compliance Requirements**

**A. Deployment Schedule**

The Commission has confirmed Charter’s assertion that the project is CEQA exempt and expects Charter to complete the proposed project within 12 months from the start date (after Charter has secured all required permits), and the Charter has committed to do so. If Charter is unable to complete the proposed project within the 12-month timeframe, it must notify the Director of the Communications Division as soon as Charter becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy the requirement of timely notification to the Director.

**Table 5: Proposed Deployment Schedule for Charter’s Proposed Project**

Project	Deployment Schedule in Days
Villa Montclair Mobile Home Park	241

**APPENDIX 11**  
**Charter Communications**  
**Payments to CASF Recipients**

Pub. Util. Code § 281(f)(11) defines the costs the Commission may reimburse as follows:

- Costs directly related to the deployment of infrastructure;
- Costs to lease access to property or for Internet backhaul services for a period not to exceed five years; and
- Costs incurred by an existing facility-based broadband provider to upgrade its existing facilities to provide for interconnection.

Additionally, D. 18-12-018 (Appendix 1, Section 7) caps administrative expenses directly related to the project at 15 percent of the grant amount.<sup>32</sup>

The grantee may submit reimbursement requests at the following intervals:

- 10 percent completion;
- 35 percent completion;
- 60 percent completion;
- 85 percent completion; and
- 100 percent completion.

The final 15 percent payment request (from 85 to 100 percent) will not be paid without an approved completion report. Payments are based on submitted receipts, invoices and other supporting documentation showing expenditures incurred for the project in accordance with the approved CASF funding budget included in the CASF grantee's application.

Payment to grantees shall follow the process adopted for funds created under P.U. Code § 270. The Commission generally processes payments within 20-25 business days, including Communications Division and Administrative Services review time. The State Controller's Office (SCO) requires an additional 14- 21 days to issue payment from the day that requests are received by SCO from Administrative Services.

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<sup>32</sup> Administrative costs are defined as "indirect overhead costs attributable to a project, per generally accepted accounting principles (GAAP), and the direct cost of complying with Commission administrative and regulatory requirements related to the grant itself." Applicants seeking additional funds will require a Commission exemption included in a draft resolution.