

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



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Order Instituting Rulemaking into the Review  
of the California High Cost Fund B Program.

Rulemaking 06-06-028  
(Filed June 29, 2006)

**RESPONSE OF VERIZON ON THE DIVISION OF RATEPAYER ADVOCATES'  
PETITION FOR MODIFICATION OF D.07-12-054 IMPLEMENTING THE  
CALIFORNIA ADVANCES SERVICES FUND (CASF)**

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October 13, 2010

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Verizon California Inc. (U 1002 C) respectfully submits this response on the Division of Ratepayer Advocates' (DRA) Petition for Modification (Petition) of D.07-12-054<sup>1</sup> Implementing the California Advanced Services Fund (CASF). Verizon submits that DRA's Petition is not supported by the law or facts in this proceeding, and that it should be denied.

**I. DRA'S PETITION LACKS ADEQUATE FACTUAL JUSTIFICATION**

DRA notes at the outset that it could not bring this Petition sooner because the changes it seeks were "not apparent until after the Commission began approving CASF applications in earnest in late 2009 and early 2010."<sup>2</sup> Notwithstanding this, DRA makes virtually no effort to analyze the applications that have been submitted and granted so as to provide factual support for its request for modification. Rather, DRA argues (and reargues) numerous policy positions without explaining why the passage of time indicates that its changes should be adopted. Accordingly, its Petition should be denied.

Rule 16.4 of the Commission's Rules of Practice and Procedure states the requirements for a petition for modification:

(b) A petition for modification of a Commission decision must concisely state the justification for the requested relief and must propose specific wording to carry out all requested modifications to the decision. Any factual allegations must be supported with specific citations to the record in the proceeding or to matters that may be officially noticed. Allegations of new or changed facts must be supported by an appropriate declaration or affidavit.

As indicated in further detail below, DRA does not justify the relief it seeks or demonstrate any new or changed facts for the Commission's consideration.

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<sup>1</sup> The Petition seeks modification of D.07-10-054, but that decision number is in error. The correct decision number is D.07-12-054.

<sup>2</sup> Petition at 2-3.

## **A. Transparency**

DRA claims that CASF applications should not be treated as confidential and should be served broadly in order to facilitate public comment.<sup>3</sup> General Order 66-C has long protected from public disclosure records of “a confidential nature,” in particular information that would place the regulated company “at an unfair business disadvantage” or as to which the public interest in withholding outweighs the public interest in disclosure. Clearly, the detailed information required to be included in a CASF application<sup>4</sup> constitutes information well-recognized to be of a confidential nature, e.g., detailed network maps usually protected for security reasons, and specific projected plans usually protected for competitive reasons. At this early stage in the application process, it is the Commission staff’s role to assess the technical capabilities of the applicant or applicants and recommend one for funding.

Once a proposed recipient is identified, under the current practice, public comment is invited on the proposed project, location, and terms of proposed service. DRA alleges no specific issue or flaw with this process other than that it is “too late” for initial public input,<sup>5</sup> nor does it assert any particular benefit that would result from earlier public involvement in what mounts to a technical staff review process.

In fact, DRA’s allegations of “secrecy” are not only unsupported, but also contradicted by Verizon’s experience with its last CASF application in The Sea Ranch. As documented in Resolution T-17238, at a stage in which DRA alleges

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<sup>3</sup> Petition at 5-7.

<sup>4</sup> D.07-12-054, OP 27.

<sup>5</sup> Petition at 6.

that secrecy continues and public input is inadequate, several local competitors submitted comments regarding current and planned service options in the area covered by Verizon's application. As a result, Verizon revised its application, and the competitors submitted further comments for Commission staff consideration, as did a local homeowners association and DRA.<sup>6</sup> This process appears to have served the public interest well, and DRA fails to allege why such public input is inadequate or too late.

**B. Affordability**

DRA asks that applicants explain how their proposals will increase broadband adoption and affordability in the areas to be served, but its complaints and requested changes in this area are equally unfounded. Although the Commission cannot regulate the prices of broadband providers, staff is in a position to evaluate proposed projects and determine whether they warrant the expenditure of public funds. Applicants must submit an estimate of the number of potential broadband customers, but DRA seeks further information by which applicants must ensure that their estimates are accurate.<sup>7</sup> Such a change is unnecessary and unsupported.

Nothing prohibits staff from seeking further supporting information, but requiring detailed marketing and outreach data twelve to twenty-four months before a project is completed is highly unlikely to yield reliable or useful information. DRA's concerns are further unfounded in that they also ignore the

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<sup>6</sup> Resolution T-17238 at 4, 6-9.

<sup>7</sup> Petition at 8.

fact that the applicant is already highly motivated to market its services since it is investing 60% of the project costs.

DRA also ignores the fact that the CASF program focuses on currently unserved and underserved areas, so an early emphasis on affordability and adoption is premature:

this program is primarily designed to make broadband service available to those *without any level of broadband today*. A focus on pricing is inapposite in the situation where there is no service today.<sup>8</sup>

Again, DRA alleges no facts in support of its proposed changes and so its request is unwarranted.

### **C. Speed**

DRA's proposed change to increase the minimum speed ignores the Commission's existing definition that areas with current connectivity at dial-up speeds are considered unserved, and areas currently under 3:1 download: upload speed are considered underserved.<sup>9</sup> DRA has not alleged that these factual descriptions have changed so as to justify a higher speed requirement, but additional concerns also arise from DRA's proposal.

First, mandating a higher minimum speed as DRA suggests would likely increase project costs. Because some broadband offerings (e.g., DSL) are more distance sensitive at higher speeds only available to subscribers located closer to the Central Office, this suggestion could reduce the number of potential subscribers per application, driving the cost per subscriber higher, making projects even less economically feasible, and thus reducing the scope of

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<sup>8</sup> Resolution T-17143 at 14 (CASF Application and Scoring Criteria)(emphasis added).

<sup>9</sup> D.07-12-054 at OP 31.

potential applications. In addition, raising the minimum to 4:1 MBPS would incent applications where existing providers offer 3:1 today, which is not an efficient outcome.

Likewise, DRA's proposal fails to recognize that setting minimum acceptable speeds does not prevent proposals exceeding the benchmark. In short, as technology advances, speeds will necessarily increase, but DRA shows no reason why such change should warrant an increase in the minimum acceptable speeds at this time.

#### **D. Cost-control**

DRA's comments seeking reasonable per-household costs, while well-intentioned, fail to recognize that the areas sought to be served by the CASF are by definition uneconomic, ones where no existing carrier has decided to serve given current cost, revenue and budget constraints. That is the problem, and that is precisely the need sought to be addressed by the CASF program. DRA's proposal to determine the "actual market costs of installing broadband without ratepayer funding" and requiring that proposed project costs "must be at or below" such costs is unrealistic.<sup>10</sup> This ignores the fact that costs are site-specific and vary based on a variety of factors that would be extremely difficult, if not impossible, to apply to actual individual project areas in a "benchmarking" analysis focused on uneconomic, hard-to-serve areas.<sup>11</sup> Moreover, as noted above, DRA's proposal ignores that applicants fund 60% of the project, and this

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<sup>10</sup> Petition at 12.

<sup>11</sup> Id.

incentive provides assurance that applicants do not seek funding in unreasonable situations.

**E. Open Access**

Again, without citing new facts to support its changes, DRA urges that the Commission enforce open access and net neutrality obligations as a condition of CASF funding.<sup>12</sup> The Commission has already addressed this issue in D.09-07-020, which established new filing requirements for CASF projects that also sought funding under the federal American Recovery and Reinvestment Act (ARRA). The Commission held that, for projects seeking both state and federal funding, the federal criteria (including the provisions that DRA seeks) should apply and, in the event of conflict, supersede those developed under CASF alone.<sup>13</sup> DRA's request is a collateral challenge to D.09-07-020 and should be rejected as such. Although the Commission did at that time defer to a subsequent decision consideration of possible changes to the CASF program alone,<sup>14</sup> DRA has alleged no facts in support of its request for modification at this time.

**F. Audits**

As in earlier areas, DRA has alleged no facts in support of modifying existing Commission decisions regarding audits. The Commission has made its right to audit fund recipients clear, as DRA's own Petition demonstrates,<sup>15</sup> and no change recommended by DRA is supported by facts. Likewise, the Commission

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<sup>12</sup> Petition at 13.

<sup>13</sup> D.09-07-020 at 12

<sup>14</sup> D.09-07-020 at 16.

<sup>15</sup> Petition at 14.

has fulfilled its audit responsibilities in numerous areas over the years, and Verizon is aware of no instance in which detailed audit data is publicly available as DRA proposes.<sup>16</sup> DRA fails to explain why the obligation to report data to the Legislature is not sufficient, or why the existing requirements risk deterring the Commission from fulfilling its obligations. DRA's comments should be rejected.

## II. CONCLUSION

For the foregoing reasons, DRA's Petition should be denied.

October 13, 2010

Respectfully submitted,



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<sup>16</sup> Petition at 15.

**CERTIFICATE OF SERVICE**

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 711 Van Ness Avenue, Suite 300, San Francisco, California 94102; I have this day served a copy of the foregoing, **RESPONSE OF VERIZON ON THE DIVISION OF RATEPAYER ADVOCATES' PETITION FOR MODIFICATION OF D.07-12-054 IMPLEMENTING THE CALIFORNIA ADVANCES SERVICES FUND (CASF)** by electronic mail to those who have provided an e-mail address and by U.S. Mail to those who have not, on the service list.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19<sup>th</sup> day of October, 2010 at San Francisco, California.

/s/ Christine Becerra  
CHRISTINE BECERRA

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