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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Wavelength Internet, LLC for a Certificate of Public Convenience and Necessity to Operate as a Competitive Local Carrier ("CLC") in Order to Provide Resold and Full Facilities-Based Broadband Internet and Voice-Over-IP Service and Designation as an Eligible Telecommunications Carrier.

Application 21-01-009

E-MAIL RULING REQUESTING INFORMATION

Dated August 3, 2021, at San Francisco, California.

/s/ SEANEEN MCCARTHY WILSON

Seaneen McCarthy Wilson
Administrative Law Judge

From: Wilson, Seaneen <Seaneen.Wilson@cpuc.ca.gov>
Sent: Tuesday, August 3, 2021 10:47 AM
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Cc: ALJ Docket Office <ALJ_Docket_Office@cpuc.ca.gov>; ALJ_Support ID <alj_supportid@cpuc.ca.gov>
Subject: A.21-01-009 Ruling Requesting Information

Good morning. In order to properly consider Application (A.) 21-01-009 for a Certificate of Public Convenience and Necessity (CPCN) the Commission requires further information, as follows:

1. Please refer to the attached spreadsheet document and respond by stating if and when RDOF Long Form documents required by the FCC were filed with the FCC by your firm. If those same documents have been filed with CPUC in response to a previous data request, or otherwise, please respond as follows:

a) An affirmative statement that each document has previously been submitted by Wavelength LLC to the FCC, and to the CPUC (pursuant to any data requests under this ETC certification process), or

b) Is included in your response to this Data Request to CPUC. Please make sure that each submitted document is identified per the section of DA 20-1422 that it is responsive to.

The purpose of this checklist format is to save Wavelength LLC the effort and time in redundant submittals, and to make sure CPUC has a complete record of your firm's filings made to the FCC.

2. Provide a 10-year pro forma showing estimated capital requirements, revenue requirements, projected subscriber take rates, annual revenue per unit (ARPU), and expected actual revenues as they demonstrate Wavelength LLC's financial and operating plan for your RDOF-subsidized network(s), and other subsidized and non-subsidized networks and operations. This 10-year pro forma will thus reflect the 10-year RDOF Program cycle, inclusive of network buildout milestones mandated by the FCC regulations for the Program. As stated, break-out the non-RDOF financial reporting and non-subsidized operations.

3. Please provide a narrative description of how your firm, as a RDOF winning bidder, proposes to achieve and comply with the service installation / service turnup interval requirement of FCC for RDOF Phase I awardees. How does your firm propose to comply with the 2 pertinent rules of the FCC relating to its operational capacity and experience relative to service provisioning capabilities in general (Subsection 3.1, hereunder), and to its ability to turn-up

service to RDOF funded and buildout locations within the mandated 10-day period in specific (Subsection 3.2).

3.1 Refer to: Rural Digital Opportunity Fund Phase I Auction Public Notice, FCC 20-77, Rel. June 11, 2020, at para. 66. “As proposed in the Auction 904 Comment Public Notice, we will require an applicant to submit in its short-form application sufficient operational information regarding its experience providing voice, broadband, and/or electric distribution or transmission service and its plans for providing service if awarded support.”

Please provide your Short Form response to CPUC as per this section of the cited FCC Public Notice, along with any additional statement you have regarding your capabilities and experience with service provisioning.

3.2 Refer to: Rural Digital Opportunity Fund Report and Order, FCC 20-5, Rel. February 7, 2020, at para. 54. “We conclude that a support recipient will be deemed to be commercially offering voice and/or broadband service to a location if it provides service to the location or could provide it within 10 business days upon request.”

Please provide to CPUC the specific technical details of your proposed service turn-up operational and technical capabilities to be implemented to achieve the FCC-mandated service interval of 15 business days.

The Applicant shall file and serve its response to this Ruling within 10 business days.

IT IS SO ORDERED.

THE DOCKET OFFICE SHALL FORMALLY FILE THIS RULING.

Attachment: CPUC RDOF-ETC Applicant Document Checklist						Wavelength Internet, LLC	
Filing #	Filings Required by FCC	Filed with FCC?	Date Filed with FCC	Filed with CPUC?	Date Filed with CPUC	Notation	DA 20-1422 Page Reference
	Filings Due to FCC: January 29, 2021						
01	Divide Winning Bids	N/A	N/A	N/A	N/A	CPUC uses the Divide Winning Bids information from FCC, as applicable to the announced Winning Bidders in California.**	pp. 3, 4
02	Applicant Information						p. 5
03	ETC Certification Status						p. 5
04	Audited Financial Statements Confirmation						p. 5
05	Initial Project Overview (Intended Technology & System Design) California Project(s)						p. 5
06	Project Funding Description and Certification						p. 5
07	Spectrum Access Description						p. 5
08	Agreement Information						p. 6
09	Ownership Information						p. 6
10	Various Certifications						p. 6
	Filings Due to FCC: February 16, 2021						
11	Letter of Credit Commitment Letter(s) (For Each State in Which Your Firm is a Winning Bidder)						p. 6
12	Detailed Technology & System Design Description(s)						pp. 6, 7
13	Certification by Professional Engineer of Technology & System Design						p. 7

14	Wireless Coverage Maps						p. 7
Filings Due to FCC: June 7, 2021							
15	Documentation of high-cost ETC designation(s)						p. 7
16	ETC Certification Letter(s)						p. 7
17	Limited Waiver Request - ETC Certification (copy as filed with FCC, if applicable)						
18	Audited Financial Statements (Prior Fiscal Year)						p. 7
19	Limited Waiver Request - Audited Financial Statements (copy as filed with FCC, if applicable)						p. 7
Filings Due to FCC: 10 Business Days Following PN Announcing FCC Ready to Authorize Support							
20	Irrevocable Standby Letter of Credit (LOC)					To be filed with CPUC when filed with FCC	pp. 8, 9
21	LOC Bankruptcy Opinion Letter (From Outside Legal Counsel)					To be filed with CPUC when filed with FCC	p. 10
* FCC Public Notice DA 20-1422, Rel. December 7, 2020							
** FCC Public Notice DA 21-170, Rel. February 18, 2021							

Seaneen McCarthy Wilson - she/her/hers
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