

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



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

R. 20-09-001  
(Filed September 10, 2020)

**COMMENTS OF ZAYO GROUP LLC (U-6102-C) REGARDING  
ASSIGNED COMMISSIONER'S RULING**

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Zayo Group, LLC (Zayo) submits these comments in response to the *Assigned Commissioner’s Ruling* (“ACR”), issued August 6, 2021. Zayo is a fiber network backbone broadband developer headquartered in Boulder Colorado, with 133,000 route miles of fiber optic network across the United States, Canada and much of Europe, with substantial operations in California. As a major developer of middle-mile backbone fiber optic lines, Zayo welcomes the recent enactment of SB 156 and the steps the Commission is now taking to implement it. Zayo submits these brief comments to correct what appears to have been a clerical error in Attachment A of the ACR.<sup>1</sup>

One of the routes identified in the ArcGIS map reflecting the so called “Anchor Build Fiber Highways” is along Route 395 where it enters California near the city of Alturas in Lassen County, through Modoc County and exits the State in Sierra County into Nevada near Reno. In reviewing that map, Zayo noted that this entire stretch of Route 395 has been designated as a part of the Anchor Build Fiber Highway. Zayo’s review of Attachment A to the ACR, when compared to the Anchor Build Fiber Highways map, however, suggests Attachment A contains a clerical error. Specifically, while the entirety of Route 395 in all three counties is shown on the map, Attachment A to the ACR, which lists the designated Highway Route numbers within each California county,

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<sup>1</sup> Pursuant to Commission Rules of Practice and Procedure Rule 1.4, Zayo requests party status in this rulemaking proceeding. Given the pendency of this proceeding, Zayo also files concurrently a motion for party status in this proceeding.

