

**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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August 27, 2021

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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.¹

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,

¹ 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.

does not show the portion of Route 395 that transits Sierra County. In particular, Route 395 is included among the highway routes in Lassen and Modoc counties but not in Sierra County. Zayo believes that this was likely a clerical error given its inclusion in the Anchor Build Fiber Highways map and requests that Attachment A to the ACR be revised to include State Route 395 as one of the covered routes in Sierra County.

Zayo reserves the right to submit additional comments on reply. Zayo appreciates the opportunity to submit these comments.

Respectfully submitted,

By: /s/ *William D. Kissinger*

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Dated: August 27, 2021