

**BEFORE THE
CALIFORNIA PUBLIC UTILITIES COMMISSION**



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

Rulemaking No. 20-09-001

**REPLY COMMENTS OF CALIFORNIA INTERNET, L.P. (U-7326-C) DBA GEOLINKS ON
ASSIGNED COMMISSIONER'S RULING**

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California Internet, L.P. (U-7326-C) dba GeoLinks (“GeoLinks” or the “Company”) respectfully submits this reply to comments filed on the Assigned Commissioner’s Ruling issued in the above-captioned proceeding on August 6, 2021 (“ACR”). As noted in its opening comments, the Company applauds the Commission’s commitment to expand broadband availability throughout California and for its work to implement the requirements of Senate Bill (“SB”) 156 and the creation of a statewide open-access middle mile network (“Statewide Network”).

I. DISCUSSION

A. The Commission Should Adopt Technology Neutral Definitions of “Middle Mile” and “Last Mile”

In its opening comments, GeoLinks asked the Commission to amend the definitions for “Middle Mile” and “Last Mile” contained in the ACR because, as written, “these definitions fail to account for other technology types that are used throughout California to provide high speed broadband connectivity.”¹ Specifically, GeoLinks asserted that 1) the definition of “middle mile” should not be limited to fiber, 2) “last mile” should not be limited to “wires or cables,” and 3) “last mile” is not solely a connection between “a house and the nearest utility pole.”

¹ GeoLinks Opening Comments on the ACR, at 2.

GeoLinks maintains that the Commission should adopt revised versions of the definitions set forth in the ACR and recommends the definitions it proposed in its opening comments. This is imperative to truly meet the Commission's goal of implementing Open Access in a "non-discriminatory manner." Limiting these definitions to only fiber, wires, and cables excludes other technologies that could serve unconnected communities where wired technology cannot reach.

Fixed wireless technology, for example, allows for fiber-like speeds without the need for expensive, time consuming, and ground disturbing construction required to deploy fiber. The example that GeoLinks provided in its opening comments (Catalina Island) shows exactly the type of situation where fiber was impracticable, but fixed wireless technology was able to fill the gap. To close off the ability for the Statewide Network to use fixed wireless where it makes the most sense or for fixed wireless companies to interconnect with the Statewide Network would only serve to leave areas where fiber deployment is impossible or economically impracticable unserved. Possibly forever. Therefore, GeoLinks urges the Commission to adopt a technology neutral approach to defining Last Mile and Middle Mile.

B. The Statewide Network Should Leverage Existing Middle Mile Infrastructure Where Available

In its opening comments CSAC states that it "believes that construction of a new, state-owned, open-access, middle-mile network will create a permanent public benefit for the residents and local economies of every county."² While GeoLinks does agree that new middle mile network will need to be constructed to complete the Statewide Network, it is important that existing infrastructure is leveraged when possible (assuming it meets any established capacity and affordability standards). This will help avoid duplicative construction, which will allow for better use of limited federal funds and help ensure expeditious completion of the Statewide Network.

² Opening Comments of California State Association of Counties on ACR, at 2.

C. The Statewide Network Must Have Sufficient Capacity to Accommodate the Current and Future Needs of All Californians

GeoLinks agrees with CforAT that “it would be calamitous if [the Statewide Network] did not provide sufficient capacity to meet future needs.”³ However, as noted in its opening comments, GeoLinks believes that the question of “sufficient capacity” is dependent on too many factors to provide a blanket statement regarding what would make that capacity sufficient. Cellco Partnership agrees noting there is no one answer for what is considered “sufficient” because there are many factors to consider “such as the number of providers that need to be supported, the types of services to be offered, the size of the conduit to be used and the desired distance between splice locations, for example.”⁴

GeoLinks reiterates that the Statewide Network must be capable of allowing i) interconnecting service providers to offer all or substantially all unserved households surrounding the Statewide Network at least 100 Mbps/ 20 Mbps service and ii) additional middle mile connection points to provide 100/20 Mbps service to unserved communities that are not within last mile connection range of the Statewide Network. In addition, plans should be put in place for every route of the Statewide Network to accommodate capacity increases if needed down the road. Moreover, the Commission must take steps to ensure that the Statewide Network also allows for non-conduit-based connections such as fixed wireless connections (which may require aerial facilities or other interconnection options). In short, the Statewide Network must allow for scalability and technology neutral flexibility to ensure that it is truly a “future-proof” solution.

³ Opening Comments of Center for Accessible Technology on ACR, at 6.

⁴ Opening Comment of Cellco Partnership dba Verizon Wireless and MCImetro Access Transmission Services LLC dba Verizon Business Access Transmission Services on ACR, at 11.

As discussed in more detail below, the question of what kind of capacity is needed and what kind of construction requirements need to be put into place to allow for future scalability should be a topic for discussion during stakeholder-specific workshops.

D. The Commission Should Hold a Series of Stakeholder-Specific Workshops to Gather Input on Requirements for the Statewide Network

In its opening comments, CETF suggests that the Statewide Network will require extensive collaboration “akin to the Manhattan Project, but with full openness and transparency.”⁵ This concept of coordinating with various stakeholders is supported by other commenters, as well. CCTA emphasizes that SB 156 requires the Office of Broadband and Digital Literacy to “consider technical advice,” which GeoLinks believes the Commission can help facilitate.⁶ In addition, SDG&E notes that the questions posed in the ACR “require specialized expertise and experience” which “should be directed to telecommunications companies that provide broadband service.”⁷ In addition, CETF explains that it is essential that the Commission and the Third Party Administrator “work with and through existing structures and ongoing efforts.”⁸

GeoLinks agrees with these comments and reiterates its suggestion that the Commission hold a series of workshops/ roundtable events administered by the Third-Party Administrator to discuss all matters on which the Commission seeks comment with various stakeholders (e.g. interconnection, affordability, capacity, etc.). Specifically, GeoLinks suggested individual workshops/ roundtables with different categories of service providers (*i.e.*, ILECs, cable companies, fixed wireless providers, mobile wireless providers, other competitive providers, etc.), existing middle mile and backhaul providers, and municipal and tribal groups. This will allow the

⁵ Opening Comments of California Emerging Technology Fund (“CETF Comments”), at 4.

⁶ Opening Comments of California Cable and Telecommunications Association on ACR, at 4.

⁷ Opening Comments of San Diego Gas & Electric Company on ACR, at 1.

⁸ CETF Comments, at 4.

Commission to not only obtain input from stakeholders on the issues discussed in the ACR but also understand existing efforts and initiatives that can be leveraged or learned from in developing the Statewide Network.

II. CONCLUSION

GeoLinks applauds the Commission's commitment to expand broadband availability throughout California and for its work to implement the requirements of SB 156. For the foregoing reasons, GeoLinks urges the Commission to establish technology neutral definitions of "last mile" and "middle mile," ensure existing infrastructure routes have sufficient capacity or the ability to increase capacity as needed, and task the Third-Party Administrator with administering a series of workshops/ roundtables with various stakeholders.

Respectfully submitted,

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