

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



FILED

09/02/21
04:59 PM

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

Rulemaking 20-09-001(Filed
8/6/21)

**OPENING COMMENTS OF THE COUNTY OF INYO TO ORDER
INSTITUTING RULEMAKING 20-09-001**

I. Introduction

In accordance with Rule 6.2 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure (“Rules”), the County of Inyo submits comments to the Order Instituting Rulemaking 20-09-001 (“Rulemaking”).

II. Comments

1. The County of Inyo supports efforts to provide communication infrastructure, including broadband and cellular services to remote rural communities, and this open-access middle-mile fiber-optic network project will do just that. The current plans for this state-owned and operated middle mile network along the California State highways in Inyo County will reach most of our unserved and underserved priority areas.
2. We would also like to ensure that the California Public Utilities Commissions is aware of an existing open-access middle-mile fiber-optic network in our region when developing the engineering plans. This network is commonly known as Digital 395, and it is operated by the California Broadband Cooperative. This project was jointly funded by the federal Broadband Technology Opportunities Program (BTOP) and California Advanced Services Fund (CASF) and has been successfully operating as a cooperative since 2013.
3. Digital 395 delivers competitively priced, carrier-grade service without capacity constraints to government, education, and medical anchor institutions across its 600-mile route, as well as network backhaul services to numerous last-mile providers.

4. Given the existence of Digital 395 through the length of Inyo County and its alignment with the State's objectives for a comprehensive open-access middle-mile network, we estimate that a portion of the planned construction depicted in the Anchor Build Fiber Highways document may not need to be constructed, potentially freeing up funds that could be used to extend the new network to reach communities and organizations along CA168 to the west of US395 from Bishop to Aspendell, and along CA168 to the east from Big Pine to the Nevada border.

III. Conclusion

The County of Inyo's participation in this proceeding will not prejudice any party and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, the County of Inyo respectfully requests that the CPUC grant this Motion for Party Status filing.

Dated: September 2, 2021

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jeff Griffiths".

Jeff Griffiths, Chairperson
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