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# ATTACHMENT D



PUBLIC UTILITIES COMMISSION  
STATE OF CALIFORNIA  
505 VAN NESS AVENUE | SAN FRANCISCO, CALIFORNIA 94102  
300 CAPITOL MALL | SACRAMENTO, CALIFORNIA 95814

January 13, 2023

Jean Kiddoo  
Chair, Broadband Data Task Force  
Federal Communications Commission

Dear Ms. Kiddoo,

Please find attached the California Public Utilities Commission's Bulk Availability Challenge summary and Evidence File.

On November 18, 2022, the FCC announced the publication of the new National Broadband Map. The map displays location-level information on fixed and mobile broadband availability data submitted by internet service providers through the FCC's Broadband Data Collection. The California Public Utilities Commission (CPUC) downloaded the California availability data and executed a work authorization with the Geographical Information Center (GIC) at California State University, Chico to compare the availability data as submitted to the FCC by ISPs, and the deployment data submitted to the CPUC by ISPs against the subscription data submitted to the CPUC by ISPs to determine where the ISP does not offer the technology reported to be available.

Given the short amount of time to analyze data from providers, the CPUC's bulk availability challenge follows the methodology outlined in the attached Evidence File. Having more time to perform data validation would provide the CPUC the opportunity to narrow down how many of these 9.9 million locations have only a single provider claiming to offer service for which an availability challenge might result in an additional unserved location for the purposes of the Broadband Equity, Access and Deployment allocation planned in May/June.

As shown in the CPUC's "Bulk Availability Challenge Summary" document, there are over 9.9 million challenged locations. Over 88% of these are for wireless internet service providers with one provider's challenged locations accounting for nearly 2/3rds of the total.

As of 1:00 PM (PT) today, CPUC's contractor, the GIC reports that the FCC BDC Portal is accepting challenge data at the rate of about 100,000 records per hour. Given this constraint, GIC estimates 8.471 million records remain to be uploaded. At this, the CPUC will require approximately 84.71 additional working hours to complete our data upload for the bulk availability challenge. For this reason, we request 10 additional working days to complete our upload. We believe CPUC will thus complete our Challenge filing by end of day (EOD) on January 30, 2023.

Please feel free to contact me or Peter Pratt ([Peter.Pratt@cpuc.ca.gov](mailto:Peter.Pratt@cpuc.ca.gov)) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Osborn". The signature is fluid and cursive, with the first name "Robert" being more prominent than the last name "Osborn".

Robert Osborn  
Director, Communications Division  
[Robert.Osborn@cpuc.ca.gov](mailto:Robert.Osborn@cpuc.ca.gov)

**(END OF ATTACHMENT D)**