

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Broadband, Video and Market Branch**

**RESOLUTION T-17684
February 27, 2020**

RESOLUTION

Resolution T-17684: Approval of funding for the grant application of Northern Valley Catholic Social Service from the California Advanced Services Fund, Broadband Public Housing Account in the amount of \$35,949 for the Woodlands II Project.

SUMMARY

This Resolution approves \$35,949 in funding from the California Advanced Services Fund (CASF) Broadband Public Housing Account (BPHA) to the grant application of Northern Valley Catholic Social Service (NVCSS). The proposed project will construct an inside broadband network with both wired and wireless components in order to connect the planned (not yet built) Woodlands Apartments II Development to broadband internet services.¹

BACKGROUND

On June 21, 2018, the California Public Utilities Commission (Commission) issued Decision (D.)18-06-032 which implemented provisions of AB 1665 specific to the CASF Adoption, Public Housing and Loan Accounts.² Key provisions of the Decision relevant to this Resolution include:

- BPHA grants can only be awarded to unserved housing developments.³

¹ In June 2019, NVCSS submitted its application stating that the project was planned and not yet under construction. Staff has since learned that construction commenced in September 2019. On February 10, 2020 NVCSS informed Staff that framing of the building is complete.

² *Decision Implementing the California Advanced Services Fund Broadband Adoption, Public Housing and Loan Accounts Provisions* [D.18-06-032] (2018), Appendix 2.

³ Id. at p. 1.

- An “unserved” housing development is a housing development where at least one housing unit within the housing development is not offered broadband internet service. A housing unit “is not offered broadband internet service” if the unit does not have access to a commercially available broadband internet service, such as Digital Subscriber Line (DSL), a cable modem, or any other technology, available at the unit.⁴

On June 27, 2019, NVCSS submitted a BPHA Infrastructure application, requesting \$45,280 to fund the low-voltage construction and equipment of an inside broadband network with both wired and wireless components in order to connect the planned (not yet built)⁵ Woodlands Apartments II Development to broadband internet services. The address provided on the application (2950 Polk Street) was for the apartment development in the contiguous property.

On August 23, 2019, NVCSS corrected and resubmitted the application. In the amended application, NVCSS provided the correct address for the planned development (2900 Polk Street). The funding request remained the same.

The Woodlands Apartments II Development is a planned low-income housing development in Redding, CA. Woodlands Apartments II is owned by a Limited Partnership (PC Redding Apartments II LP of which NVCSS is the managing general partner).⁶ The housing development will have a total of 20 units (19 low-income units, and one unit for the building manager). NVCSS plans to complete construction by the end of March 2020.

NVCSS is an incorporated nonprofit organization that is currently exempt under section 501(c)(3) of the Internal Revenue Code. It has received public funding to subsidize the construction of low-income housing and is an eligible applicant under the BPHA.⁷ NVCSS provides low-cost or free mental health checkups, housing, vocational, and support services to individuals and families in California's Northern Sacramento Valley. It is operated by the Catholic Church.

⁴ D.18-06-032, Appendix 2, p. 3.

⁵ See fn 1.

⁶ D.18-06-032, Appendix 2, p. 4 which states “Non-profit housing developers involved in limited partnerships with for profit entities participating may also be eligible, since the IRS considers an exempt organization's participation as a general partner in a limited partnership with for profit limited partners as consistent with the organization's exempt status under Internal Revenue Code Section 501(c)(3).”

⁷ Id. at p. 3.

NOTICE

On July 12, 2019, Staff posted the proposed project description on the Commission's BPHA webpage⁸ and sent a notice regarding the proposed project to the CASF Distribution List.

On September 3, 2019, Staff posted the proposed project's description for the amended application with the revised address on the Commission's BPHA webpage and sent a notice regarding the change of address for the proposed project to the CASF Distribution List.

PROTESTS/CHALLENGES

On July 26, 2019, Charter Communications, Inc. (Charter) submitted a letter challenging the application stating that it already serves the residents at 2950 Polk Street. Charter provided evidence to support its challenge.⁹

Charter then submitted a challenge to the amended application on September 17, 2019. In its challenge, Charter's arguments were similar to its first challenge, except that it included the following statement, "The corrected application changes the address to a different address in the same apartment complex, 2900 Polk Street. 2900 Polk Street is not constructed yet but will be part of the same Woodlands Apartment development as 2950 Polk Street. However,...the new building is part of a complex where Charter already provides service and stands ready to serve all parts of the complex."¹⁰

DISCUSSION

In compliance with D.18-06-032, Staff determined NVCSS's Woodlands II project is eligible to receive \$35,949 in CASF BPHA Infrastructure grant funding.

While the project meets all expedited review criteria, the Staff recommends that this project be approved via Resolution because the question of whether a building still under construction can qualify as "unserved" was not specifically addressed in the existing BPHA rules.

Details of Staff analysis are explained in the following sections:

⁸ <https://www.cpuc.ca.gov/General.aspx?id=908>

⁹ *Charter Challenge to NVCSS BPHA Application*, July 26, 2019

¹⁰ *Charter Challenge to Corrected NVCSS BPHA Application*, September 17, 2019

- I. Project Eligibility
- II. Funding Determination
- III. Compliance Requirements
- IV. Payment to CASF Recipients

I. Project Eligibility /Disposition of Charter's Challenge

In its application, NVCSS attested that the Woodlands Apartments II Development is an “unserved” housing development. Charter claims that the Woodlands Apartments II Development is an extension of an existing apartment development on a contiguous property, and further claims that it already serves the under-construction project location since it currently serves the existing adjacent development (2900 Polk Street).

Staff disagrees with Charter for the following reasons:

First, the apartment development on the contiguous property was constructed in 2016. The Woodlands Apartments II Development is a new construction owned by a different legal entity.¹¹ It will be managed separately from the existing apartment development. Since property ownership and management are different from those for the apartment development on the contiguous property, Staff concludes that the Woodlands Apartments II Development is not an extension of the existing housing development.¹²

Second, the building is under construction and not wired for broadband internet and, therefore, no unit is being offered a broadband internet service per D.18-06-032.¹³ Staff has determined that the Woodlands Apartments II Development is “unserved.”

Third, the applicant acquired a contract from Charter to serve the Woodlands Apartments II Development different from the Charter contract for service on the contiguous property. The contract with Charter for Woodlands Apartments II

¹¹ The existing apartment complex (“The Woodlands”) is owned by PC Redding Apartments Limited Partnership of which NVCSS is a general partner.

¹²NVCSS stated (in an email from Stephanus Malaihollo, Systems Engineer, Palm Communities, December 17, 2019) that the Woodlands Apartments II Development is completely separate from the existing apartment development on the contiguous property as it is a different entity, has different investors and funding not tied to the previous development.

¹³ See fn 1.

Development is to bring the circuits to the minimum point of entry (MPOE).¹⁴ All internal wiring would be done by NVCSS.

Therefore, Staff concludes that the Woodlands II project meets all the requirements stated in the guidelines¹⁵ and recommends denying Charter's challenge.

II. Funding Determination

Staff determined that NVCSS's initial proposal met the program's objective but the cost per unit was high compared to the cost per unit for previously approved BPHA projects with similar technology. Staff asked NVCSS to revise its proposal. NVCSS negotiated with its suppliers and contractors and reduced its request to \$35,949. Staff considers this reasonable, given that NVCSS will be using the latest technology and higher caliber equipment. The proposed project includes the installation of two technologies combined, a Switched Ethernet network and Wi-Fi (atypical for approved BPHA projects).

III. Compliance Requirements

NVCSS is required to comply with all the guidelines, requirements, and conditions associated with the grant of CASF funds as specified in D.18-06-032. Such compliance includes, but is not limited to the following:

A. California Environmental Quality Act (CEQA)

All CASF grants are subject to CEQA requirements unless the projects are statutorily or categorically exempt pursuant to the CEQA Guidelines.

Given that the activity of the installation of network equipment and inside wiring for the purpose of network installation at the Woodlands Apartments II Development is to occur during building construction, the activity is covered by the common sense exemption that CEQA does not apply when there is no possibility that the activity in question may have a significant effect on the environment.¹⁶

¹⁴ D.18-06-032, Appendix 2, p. 3. "A 'minimum point of entry' (MPOE) is either the closest practicable point to where the wiring crosses a property line or the closest practicable point to where the wiring enters a multiunit building or buildings."

¹⁵ Id. at pp. 14-16.

¹⁶ CEQA Guidelines § 15061(b)(3)

B. Execution and Performance

NVCSS must complete all the project activities under the award requirements on or before 12 months from the date this Resolution is approved. If NVCSS is unable to complete the proposed project within the 12-month time frame requirement, NVCSS must notify the Director of Communications Division as soon as it becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment from the awarded grant for failure to satisfy this requirement.

In the event that NVCSS fails to complete performance in accordance with the terms of the Commission's approval and as set forth in this Resolution, the applicant must reimburse some or all of the CASF funds it has received.

Material changes in the entries for the application, such as discontinuing operation or bankruptcy, or change of name (DBA), change of address, telephone fax number or email address should be reported by letter to the Commission's Director of Communications Division.

C. Project Audit and Reporting Requirements

See Appendix A.

IV. Payments to CASF Recipients

The Commission may reimburse NVCSS expense in accordance with, and within the time specified in California Government Code § 927 et seq. Details are in Appendix B.

COMMENTS ON DRAFT RESOLUTION

In compliance with Public Utilities Code, § 311(g), Staff emailed a notice letter on January 3, 2020, informing all parties on the CASF Distribution List of the availability of the draft of this resolution for public comments at the Commission's website at <http://www.cpuc.ca.gov/PUC/documents/>. This letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available on this same website.

Charter submitted comments by the due date of January 26, 2020.¹⁷ No reply comments were received.

¹⁷ Charter submitted comments on January 27, 2020. This complies with the Commission's Rules of Practice and Procedure Rule 1.15, when a due date (January 26th) falls on a day the Commission is closed,

Charter's Comments

Charter opposed the draft resolution, claiming that Staff erred in determining that the property is an unserved housing development, as defined in the statute and in the BPHA guidelines.¹⁸ Charter stated that the plain language of the statute and the BPHA guidelines contemplates an existing housing unit for a development to be eligible for funding.¹⁹ Charter stated that Staff's determination that an unbuilt housing development is "unserved" is both contrary to law, bad public policy, and denies Charter due process.²⁰ Charter further stated that the application does not meet the requirements adopted in D.18-06-032 because the applicant cannot verify it has not denied an Internet Service Provider (ISP) access to the property or attest to the condition of the property, and that the applicant failed to identify a bandwidth source at the MPOE.²¹ Additionally, Charter opposes the draft Resolution because it asserts Staff's reliance on the ownership and management differences between the existing Woodland Complex and the Woodlands II Apartments Development is flawed and not relevant.²²

Staff's Response to Charter's Comments:

Charter opposes Staff's recommendation to approve funding for the Woodlands II project on the grounds that the project does not comply with the statutory requirement which requires the housing development to be unserved. An "unserved housing unit" is defined as:

... a housing unit where at least one housing unit within the housing development is not offered broadband internet service. A housing unit is not offered broadband internet service if the unit does not have access to a commercially available broadband

the due date of these comments is automatically extended to the first day the Commission is open (January 27, 2020). Staff realized that NVCSS was inadvertently left off the distribution list. NVCSS was not provided timely notice of the draft resolution, and therefore, did not submit comments by the January 27th due date. Staff informed NVCSS of the omission and NVCSS elected (in an email from Stephanus Malaihollo, January 29, 2020) to forgo seeking an extension of time to submit comments, and thus effectively waived its right to comment on the draft resolution. .

¹⁸ Charter's Comments to Draft Resolution T-17864, p. 3.

¹⁹ Id. at p. 3. Charter further states that a housing unit must exist for Staff to be able to determine whether commercially available broadband service is offered at the unit.

²⁰ Id. at pp. 5-7.

²¹ Id.

²² Id. at pp. 4-5.

internet service, such as Digital Subscriber Line (DSL), a cable modem, or another protocol, available at the unit.²³

Staff disagrees with Charter's contention. Specifically, in its application, NVCSS stated that the Woodlands II project is a planned low-income housing development (new construction) and not wired for broadband internet. Since then, the housing development has been under construction and to date, the framing of the development is complete.²⁴ As such, the building is under construction and not wired for broadband internet and therefore no housing units in the project are being offered broadband internet service. Consequently, under Pub. Util. Code section 281, the project is an unserved housing development.

Charter asks the Commission to reject the application because housing units within the planned development are not built or are under construction. Staff disagrees with this and Charter's contention that funding the Woodlands II project would violate both the plain language of the statute and the BPHA guidelines (D.18-06-032) which contemplate an existing "housing unit" for a development to be eligible for funding.²⁵ Charter, focuses on the statute and the guidelines which, however, do not state how projects in housing developments that are planned or under construction should be treated. In fact, no language in the statute or BPHA guidelines would support Charter's position that the Legislature intended for Pub. Util. Code section 281(i)(3)(B)(i) to mean housing units must be constructed to be eligible for BPHA funding. The term "housing unit" is not defined in statute nor in D.18-06-032. Instead, Pub. Util. Code section 281 requires housing developments to be unserved and is specific to a housing unit not being offered broadband internet service, implying that whether the unit is constructed is irrelevant to that determination.²⁶

By contrast, accepting Charter's interpretation that the statute and guidelines require a physically existing "housing unit" for a development to be eligible for BPHA funding, would contradict the statutory intent and overall goal of the program. Indeed, the

²³ Pub. Util. Code, § 281(i)(3)(B)(i) and D.18-06-032, Appendix 2, p. 3.

²⁴ Resolution T-17864, pp. 3-4; see also fn 1.

²⁵ Charter's Comments, p. 3.

²⁶ Pub. Util. Code, section 281(i) states, a "Publicly support community" or PSC, is defined as a publicly subsidized multifamily housing development. Pub. Util. Code section 281(i)(3)(A) further states, funding is provided to PSCs to finance projects to connect a broadband network to that PSC. Whether or not Section 281 requires the PSC to be constructed, is under construction or is constructed is not contemplated and has never be a determining factor for BPHA funding. The statute and program guidelines do not state how an unconstructed project should be treated. The Commission has the discretion to determine whether an applicant is eligible for funding even though the development is under construction and housing units have not been built or wired for service

purpose of the BPHA is to close the digital gap in public housing communities and to address a critical need to connect residents of publicly subsidized properties to high-speed internet. The BPHA grew out of the need to fund publicly-subsidized housing units in California that lacked broadband connections and reliable connectivity.²⁷ The funds in the BPHA help further this goal by approving projects which are beneficial to low-income residents who would otherwise be without broadband. As such, it would be contrary to this purpose to exclude a project on the basis that housing units within the planned development are not built or are under construction, as well preclude approval of projects that will help further these efforts.

Further, Staff notes that the Commission has approved BPHA grants for the installation of broadband networks in new housing developments (either in planned or under construction), showing that whether a housing unit is fully constructed is not germane to whether the housing development is unserved.²⁸ Similarly, waiting for a building to be fully constructed before awarding a BPHA grant defeats the purpose of the grant. The majority of the grant funding is used for the costs to install wiring to the units, and that internal wiring occurs before the building is fully constructed. Additionally, accepting Charter's interpretation would result in few, if any, projects being approved for BPHA funding.

Charter further states that it has demonstrated that it "can serve" the development because it already provides service to the contiguous property and that the network already passes the Woodlands Apartments II Development.²⁹ However, Staff notes that whether a network is available on a contiguous property is irrelevant to the definition of unserved housing development as defined. Similarly, whether Charter "can or will serve" does not mean that it does, in fact, serve the development.

Staff noted that the Woodlands Apartments II Development is a separate development from the Woodlands I complex on the contiguous property and the fact that there is a separate ownership structure is germane to this argument. Staff agrees that, from the

²⁷ Senate Bill 745(Hueso), Stats. 2016, ch. 710 amending Pub. Util. Code, sections 281 and 914.7.

²⁸ The following projects for an installation of an broadband network in new housing developments (either in planned or under construction) were approved by expedited review: MidPen Housing Corporation Donner Lofts and Foster Square approved on 10/30/2015, MidPen Housing Corporation Laguna Commons approved on 4/6/2016, MidPen Housing Celestina Gardens and St. Stephens Senior Housing approved on 11/8/2016, First Community Housing Second Street Studios approved on 3/2/2017, PEP Housing Sun House Senior approved on 3/7/2017, and Mercy Housing California 180 Beamer and 623 Vernon approved on 9/7/2017

²⁹ Charter's Comments, pp. 3-6.

point of view of program rules, the issue of ownership is only relevant in to the question view of eligibility.³⁰

NVCSS provided Staff documentation showing that a contract exists with a Charter subsidiary specifically for the Woodlands Apartments II Development. NVCSS informed Staff that the contract proposes to provide for the installation and maintenance of equipment from the Charter subsidiary (the Operator) at the Woodlands II location.³¹ The applicant has stated that it will do the trenching to connect the Operator's equipment at the MPOE to the Operator's Point of Presence as well as to install all internal wiring from the MPOE to the residential units.^{32, 33} By contrast, Charter has not provided Staff any supporting documentation indicating that Charter's contract for the Woodlands I complex extends to any new or future development on the contiguous property. Absent evidence of such an agreement, Charter's assertion that its serving of Woodlands Phase I should be taken to mean Charter serves all future buildings or contiguous properties (Woodlands Phase II) is not supported.

Additionally, a property owner has the right to choose the entity it wants to install facilities for the broadband network on its property while the building is under construction. NVCSS is not required to use Charter's services just because Charter is serving the building on the adjacent property. Here, NVCSS has chosen to install the facilities itself.

Charter's other arguments similarly are not relevant to the issue of whether the Woodlands II location is an unserved housing development, as defined in statute and in D.18-06-032. Specifically, Charter argues that the applicant cannot verify it has not denied an ISP access to the property or attest to the condition of the property and the applicant failed to identify a bandwidth source at the MPOE.³⁴ Staff disagrees with this argument. Per D.18-06-032, the applicant must attest that (1) it expects its property to be in residential use for at least the next 10 years and (2) the buildings included in the application meets the standards for acceptable basic living conditions as determined

³⁰ Other projects have been funded through the BPHA that were installations on contiguous properties with different limited partnerships listed as owners. For example, CD awarded grants by expedited review for the installation of inside networks in the Sunnyview I and II apartment developments in Delano, CA. These developments are physically contiguous to each other and are owned by different limited liability corporations whose managing general partner is the Central Valley Coalition for Affordable Housing.

³¹ Malaihollo , Stephanus "Woodlands II Project". Email to Staff dated January 22, 2020.

³² Malaihollo , Stephanus "Woodlands II Project". Email to Staff dated December 17, 2019.

³³ In this situation, the "Point of Presence" is the access point for the Operator's existing network

³⁴ Charter's Comments, pp. 5-6. Charter further claims since the rules contemplate an existing structure, the application is premature and should be denied. (Id. at 7).

under HUD for similar guidelines.³⁵ The applicant attested to both statements in its application, and, thus, complied with these requirements. The applicant identified Charter as an ISP for the internet bandwidth source and provided evidence of a contract to support that contention. Charter, however, noted an error in the report posted by Staff after project submission on the Public Housing Account website which details the specifics of the Woodlands II project. The wording in the report states that the ISP was denied access. This statement is not correct, as the applicant did attest that it has not denied any ISP access to the property. The report was in error, and has been corrected and reposted on the Public Housing Account website.³⁶

Lastly, Charter argues that it cannot determine whether commercially available broadband service is offered at the unit if the unit does not exist and therefore it is denied due process to meaningfully challenge the application.³⁷ Staff disagrees with Charter's contention. Due process requires notice and opportunity to be heard. Charter received notice of the draft Resolution and had the opportunity to challenge the application, which it did. The fact that Staff rejected the challenge does not mean Charter was denied due process.

FINDINGS

1. NVCSS submitted an application for BPHA funding for its Woodlands II project on June 27, 2019. NVCSS amended its application and resubmitted the Woodlands II project with a corrected address on August 23, 2019.
2. NVCSS's application proposes the construction of the broadband network with both wired and wireless components in order to connect the planned (not yet built) Woodlands Apartments II Development to broadband internet.
3. On July 12, 2019, Staff posted a project summary of the Woodlands II project. The summary was posted on the Commission's Broadband Public Housing Account (BPHA) webpage. On September 3, 2019, Staff posted a project summary of the Woodlands II project with a revised project address.
4. Charter submitted a challenge for both the initial application and the revised application on the basis that it serves the project location. Given that the Woodlands Apartments II Development is not fully constructed, that the

³⁵ D.18-06-032, p. Appendix 2, pp. 6, 8.

³⁶ <https://www.cpuc.ca.gov/General.aspx?id=908>

³⁷ Charter's Comments, pp. 6-7.

development is not an extension of any previous apartment development and that Charter has not demonstrated that it is offering broadband internet service at the project location, Staff denies Charter's challenge.

5. Based on its review, Staff determined that the project qualifies for funding under D.18-06-032 and recommends Commission approval of CASF funding for NVCSS's Woodlands II project.
6. A notice was emailed on January 3, 2020, informing all applicants filing for CASF funding and parties on the CASF distribution list of the availability of the draft of this Resolution on the Commission's website at <http://www.cpuc.ca.gov/PUC/documents/>. Charter submitted comments. No reply comments were received.

THEREFORE, IT IS ORDERED that:

1. The Commission shall award a grant of \$35,949 to Northern Valley Catholic Social Service (NVCSS) for the Woodlands II project as described herein.
2. The program fund payment of \$35,949 shall be paid out of the CASF Public Housing Account in accordance with the guidelines adopted in D.18-06-032, and with the process defined in Appendix B of this Resolution, "Payments to CASF Recipients".
3. NVCSS shall comply with all guidelines, requirements and, conditions associated with a CASF award, as specified in D.18-06-032, and this Resolution.
4. If NVCSS fails to complete the project in accordance with the CASF guidelines and requirements outlined in D.18-06-032, and the terms in this Resolution, NVCSS must reimburse some or all of the CASF funds that it has received.
5. NVCSS must complete and execute the consent form (to be sent to NVCSS after this Resolution is adopted) agreeing to the conditions set forth in this Resolution and return it to the CASF Staff within 30 calendar days from the date of the adoption of this Resolution. Failure to submit the consent form within 30 calendar days from the date of this Resolution's adoption, the Commission will deem the grant or award to be null and void.

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on February 27, 2020. The following Commissioners approved it:

/s/ ALICE STEBBINS

Alice Stebbins
Executive Director

MARYBEL BATJER
President
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
Commissioners

APPENDIX A

Audit and Reporting Requirements

Project Audit

The Commission has the right to conduct and enforce any necessary audit, verification, quality check, and discovery during and after the project implementation to ensure that CASF funds are spent in accordance with Commission approval.

NVCSS invoices will be subject to a financial audit by the Commission at any time within three years of completion of the project.

Project Reporting Requirements

NVCSS must submit a project status report six months after the project award date if the project has not been completed, irrespective of whether NVCSS requests reimbursement or payment. The project status report shall include the deployment schedule with major milestones, and it shall indicate the planned and actual completion date of each project task/milestone as well as any problems or issues encountered during implementation and the actions taken to resolve these issues/problems during project implementation and construction. NVCSS must certify that each project status report is true and correct under penalty of perjury.

NVCSS must submit a project completion report describing the total project cost, including engineering, planning, design, material costs, and an assessment of the average speed the internet service is delivering to a resident as per the grant requirements during the peak hours of 7 p.m. to 11 p.m. NVCSS must include the screenshots of CalSPEED speed test results in its completion report.

NVCSS must certify that each project status and completion report is true and correct under penalty of perjury.

NVCSS is required to operate and maintain the broadband network for five years after it has been successfully installed. After installation, for a five year period, NVCSS must submit timely reports for every project awarded on a biennial basis showing the following three Key Performance Indicators: the average monthly percentage of uptime, the average monthly number of individual devices that access the system and average amount of data transferred over the network.³⁸

³⁸ D.18-06-032, Appendix 2, pp. 17-18.

APPENDIX B

Payments to CASF Recipients

Payment to NVCSS will be made upon project completion and the submission of a project completion report. NVCSS may request payment for expenditures incurred during the first six months if NVCSS submits a six-month progress report and certifies that the progress report is true and correct under penalty of perjury.

Payment will be based upon receipt and approval of invoices/other supporting documents showing the expenditures incurred for the project in accordance with the CASF funding submitted by NVCSS in their application.

Payment to NVCSS will be made in accordance with, and within the time specified in California Government Code § 927 et seq. The Commission generally processes payments within 20-25 business days, including Communications Division and Administrative Services review. The State Controller's Office (SCO) requires an additional 14-21 business days to issue payment from the day that requests are received by SCO from the Administrative Services.³⁹

³⁹ D.18-06-032, Appendix 2, page 19 for full listing of payment requirements.