

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Carrier Oversight and Programs Branch**

**RESOLUTION T- 17238
January 21, 2010**

R E S O L U T I O N

Resolution T-17238 Approval of Funding for The Sea Ranch Project of Verizon California, Inc. (U-1002-C) from the California Advanced Services Fund (CASF) Amounting to \$ 1,872,017

Summary

This Resolution adopts funding for The Sea Ranch project of Verizon California, Inc., (Verizon) amounting to \$1,872,017 from the California Advanced Services Fund (CASF). This project will bring broadband to Cazadero, Timber Cove, and The Sea Ranch communities. The amount granted represents 40% of the total project cost plus Contribution in Aid of Construction (CIAC) of this unserved and underserved area application filed in accordance with Resolution T-17143.

Background

On December 20, 2007, the Commission approved Decision (D.) 07-12-054 which established the two-year CASF program to provide matching funds of up to 40% of the total project costs for the deployment of broadband infrastructure in unserved and underserved areas in California. ¹ Resolution T-17143, approved on June 12, 2008, adopted the application requirements, scoring criteria for the award of funds, and a prescribed timeline for other filings and notifications including a projected Commission Meeting date for final approval of award(s). This same Resolution directed interested applicants seeking funding for underserved and underserved projects, to file their project proposals and funding requests beginning July 24, 2008 and August 25, 2008, respectively.

On July 9, 2009, the Commission issued D.09-07-020 establishing new schedules and plans for the filing, review, and approval of an additional round of broadband project requests.

¹ SB 1193 (Chapter 393, Stats. of 2008) established the California Advanced Services Fund as a new public purpose program.

This decision also provides the potential for the applicants to seek CASF program funding while pursuing funding for broadband deployment grants issued under the American Recovery and Reinvestment Act (ARRA).² Because the federal grants under ARRA can fund up to 80% of the project, the Commission provided applicants in D.09-07-020 the opportunity to seek an additional 10% funding coverage from the CASF, leaving only 10% for the applicant to provide.

As of December 17, 2009, \$57.61 million has been granted for 38 projects covering 11,045 square miles benefiting 115,706 potential households as follows:

- Unserved - \$12.04 million, 17 projects, 4,303 square miles, and 33,327 households
- Underserved - \$45.57 million, 21 projects, 6,742 square miles, and 82,379 households.

Notice/Challenges

The Census Block Group (CBG) list for the Sea Ranch application covering the three project area locations appeared by county on the Commission's CASF website page under "UNDERSERVED areas proposed to be served as of August 25, 2009: Census Block Groups (CBGs)." One challenge was filed with the Communications Division (CD) for two CBGs and, after verification of the challenge, CD modified the maps to remove the two confirmed challenged areas.

Discussion

This Resolution adopts a total of \$1,872,017 in CASF funding support for The Sea Ranch project. The project is described in detail in Appendix A.

Verizon originally submitted The Sea Ranch application consisting of three separate project area locations (i.e. The Sea Ranch, Timber Cove, and Cazadero areas) on August 25, 2009, for a total CASF funding request of \$2.183 million. Subsequently, based on challenges filed and CD staff findings, Verizon modified its CASF funding request to \$2.147 million. This application proposes construction of 20 miles of new fiber optic line from the Cazadero area to the Timber Cove wire center and extending up to The Sea Ranch. Connection with AT&T's Monte Rio wire center and other leased facilities will enable the backhaul of traffic to Verizon's Novato facilities. For this project totaling \$3,548,175, as modified, Verizon seeks a CASF grant for \$1,419,270, equal to 40% of the project's costs, plus Contribution in Aid of Construction (CIAC) funding of \$452,747 for a total grant of \$1,872,017. Verizon does not plan to seek federal ARRA funds for this proposed project

For qualification purposes under the CASF program, underserved areas are defined as areas where broadband is available but no facilities-based provider offers service at speeds of at

² The American recovery and Reinvestment Act (ARRA) appropriates \$7.2 billion for grants and loans to support broadband deployment on a national level. ARRA offers a unique and ground breaking opportunity for California to partner with the federal government and other state agencies in advancing the goal of bridging the digital divide.

least 3 mbps download and 1 mbps upload. CD reviewed this project's eligibility through the analysis of the required data submitted. These data include, but are not limited to: proof of Certificate of Public Convenience and Necessity (CPCN) registration; descriptions of current and proposed broadband infrastructure; Geographic Information System (GIS) formatted Shapefiles mapping the subject areas; assertion that the area is underserved; potential subscriber size and household incomes; project construction schedule; project budget; proposed pricing and commitment period for new subscribers; and, financial qualifications of the applicant. In addition, CD reviewed the Shapefiles submitted which mapped the broadband deployment proposed using United States 2000 Census data, the January, 2008, Broadband Task Force Report (BBTF) including its on-line maps, and the revised August 10, 2009, California Broadband Task Force (CBTF) map, among others. Comparisons of submitted maps to that of the BBTF and CBTF verified the existence or non-existence of broadband service as well as speeds in areas where broadband services are available.

CD verified this project and, when necessary, requested additional information and/or meetings with the applicant to clarify its project proposal. CD also contacted local businesses and spoke to residents and service providers to validate the CBTF map data.

Cazadero

For the Cazadero area of The Sea Ranch application, CD verified that portions of the Cazadero area CBG are both served and unserved. A challenge filed with CD by Black Mountain Communications for two CBGs confirmed existing service around the proposed Cazadero project area. After a review of Black Mountain Communications' existing service area and the CBTF maps, CD informed Verizon of its findings and Verizon agreed to revise its application to reflect only those parts of the CBGs that are unserved.

Timber Cove

For the Timber Cove area, the CBTF shows service at speeds of between 5-10 mbps but one prominent hotel serving that coastal community asserted that no one in the area has speed that fast. The hotel, in fact, pays for a T-1 dedicated line as does the local school in Fort Ross; everyone else in the community with internet service subscribes to satellite service. CD contacted a resident, referred by the hotel, and the resident attested that the only broadband service available for Timber Cove is from Hughes Satellite. According to this resident, although there is service, it is extremely slow, spotty, unreliable, and expensive, costing \$129 per month.

CD could not find evidence of speeds of 5-10 or 10-100 mbps, as reflected in CBTF, in Timber Cove. No challenges have been submitted to date to support the CBTF speed information. Therefore, CD is allowing Verizon to retain the CBG for the Timber Cove project area and concludes that Timber Cove is eligible for CASF funding.

Sea Ranch

For The Sea Ranch area, the CBTF indicates service on the southwest end of the community at speed between 10-100 mbps. Central Valley Cable, Inc. (CVC), the local cable service provider based in Gualala, contacted CD to provide challenge information. CVC confirmed that it offers its highest speed service as 3 mbps download and 1 mbps upload (3/1) to local residents in The Sea Ranch.

CVC then submitted supporting documentation including speed tests conducted in four different locations within its service area, a list of subscribers of the 3/1 mbps Premium package who reside in various areas of The Sea Ranch, and a list of all its customers within its footprint. In addition, CVC explained to CD its most recent network improvements in The Sea Ranch as having added bandwidth for its customers over a period of 13 months. However, residents in The Sea Ranch have come forward with letters of support for Verizon's proposal indicating that the existing broadband DSL service is slower than the advertised 3/1 mbps and not deployed throughout the service area. Specifically, they have noted that CVC has concentrated existing service for The Sea Ranch mainly on the west coastal side of State Highway 1 and that homes on the east side of State Highway 1 and some pockets of the area are not served.

In response, Verizon submitted a revised project proposal on November 10, 2009, covering The Sea Ranch community to be served out of its Sea Ranch wire center. From further analysis of information and comments filed by parties, Verizon plans to provide service in Cazadero, Timber Cove, and the Yardarm Drive cluster of The Sea Ranch. The Project Map of Appendix A reflects the proposed project as modified.

Verizon states this fiber installation would improve the area's service reliability by moving feed off of copper wire from its central office and providing access to other service providers from The Sea Ranch middle mile backhaul. Verizon proposes to offer speeds of 7 mbps download and 0.768 mbps upload in the service areas of The Sea Ranch application. Further, Verizon indicated that it would agree to a 12-month price commitment with rates of \$49.25 monthly for the 7/0.768 mbps plan (where available), \$45.25 monthly for 1.5 mbps or 3 mbps plan (where available), and \$34.25 monthly for the 768 kbps and 384 kbps up plan.

The project as modified spans 20 square miles and census information available indicates approximately 232 households combined are in the project locations. The total cost of the revised project is \$3,548,175 with the 40% CASF subsidy amounting to \$1,419,270 and CIAC amounting to \$452,747 for a total CASF fund request of \$1,872,017. A breakdown of costs is as follows:

| CASF Eligible Expenses | Project Cost |
|----------------------------------|---------------------|
| Pre-Construction and Engineering | \$2,200,000 |
| Materials/Supplies and Equipment | \$148,175 |
| Environmental Studies/Permitting | \$1,200,000 |
| Total Proposed Budget | \$3,548,175 |
| CASF 40% Funds | \$1,419,270 |
| CIAC @ 31.9% | \$452,747 |
| Total CASF Funding | \$1,872,017 |

In view of these findings, Verizon's The Sea Ranch project, as modified, is recommended for approval and award of CASF funding.

This project is subject to the California Environmental Quality Act (CEQA). The Commission cannot authorize the disbursement of funds, and Verizon cannot conduct ground disturbing activities, until completion of CEQA review. Verizon indicates that it will agree to provide, prior to the first 25% payment, identification of any other special permits required with a cross reference to the government agencies from which the permits will be required for this project. Verizon California, Inc. should comply with all guidelines, requirements, and conditions associated with the granting of CASF funds as specified in Resolution T-17143 including the submission of FCC Form 477 and compliance with the CEQA, among others

The Application Requirements and Guidelines on the awarding of CASF Funds³ provide that the execution of a Performance Bond is not required if 60% of the total project costs come from the applicant's capital budget and is not obtained from outside financing sources. In its application, Verizon indicated that 60% of the total project costs will come from its existing capital budget as submitted in the company's financial documentation. Therefore, a performance bond is not required for this project.

Payments to CASF Recipients

Submission of invoices from and payments to Verizon California, Inc. shall be made in accordance with Section IX of Appendix A of Resolution T-17143 and according to the guidelines and supporting documentation required in Resolution T-17143. Payment to Verizon shall essentially follow the process adopted for funds created under Public Utilities Code §270. The following table describes the timeline for processing CASF payments.

³ Resolution T-17143

| Event | Payment Cycle 1 (Day/Month) | Payment Cycle 2 (Day/Month) |
|---|--|---|
| Invoices due from Verizon California, Inc. to CD | 5 th of Month 1 | 20 th of Month 1 |
| Payment letters from CD to Information and Management Services Division (IMSD) ⁴ | On 19 th of Month 1 | On 4 th of Month 2 |
| Invoices submitted from IMSD to State Controller's Office (SCO) for payments | 20 th through 26 th of Month 1 | 5 th through 13 th of Month 2 |

Verizon may submit its invoices under Payment Cycle 1 or 2.

If any date in this payment schedule falls on a weekend or holiday, that date will be advanced to the next business day but the remaining dates in the payment schedule will remain unchanged. SCO requires 14 to 21 days to issue payment from the day that requests are received by SCO.

Comments on Draft Resolution

In compliance with PU Code § 311(g), a notice letter was emailed on November 13, 2009, informing a) CASF applicants filing under D. 09-07-020 and b) parties on the service list of R.06-06-028 of the availability of the draft of this Resolution for public comments at the Commission's website <http://www.cpuc.ca.gov/static/documents/index.htm>. This letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at this same website.

Opening comments, due by November 30, 2009, were filed by CVC, Verizon, and Esplanade.US, Inc. CVC, Verizon, The Sea Ranch Association, and The Division of Ratepayer Advocates filed Reply Comments, due December 7, 2009.

The Comments filed and responses to them are discussed below.

Opening Comments

I. Central Valley Cable

CVC objected to CD's description of The Sea Ranch as "underserved," asserted its history of internet service to The Sea Ranch since 2001, and discussed the technology improvements it implemented over the years, especially the 2008-09 upgrades which

⁵ The above schedule is contingent on the CASF recipient submitting clear, complete, and error-free invoices to CD. Additional time to process payments may be necessary if CD finds problems with the submitted invoices.

expanded the bandwidth capacity for the area. Besides offering 3 mbps download and 1 mbps upload, CVC stated it offers residents the choice of four other, slower, speeds. Specifically, CVC argued against CASF approval of Verizon's project in The Sea Ranch when, at 7 mbps download and 768 kbps upload, the proposed project does not meet the Commission's own CASF benchmark speed. CVC requested consideration of equal treatment of confidential information of its proprietary information, which PUC-regulated carriers are afforded, in order that CD staff may thoroughly analyze relevant speed and customer billing data to determine the area is and has been served by broadband at 3/1 mbps. CVC argued that inaccurate speed data from residents precipitated from the original Resolution released in October and sent to the Commission misleads CD staff. CVC invited on-site speed testing by CD staff to validate its service throughout The Sea Ranch.

II. Verizon

Verizon commented that the draft Resolution's 12 month price commitment required correction and submitted the correct figures for the three proposed subscription plans. Verizon requested correction of the subscribership numbers for the project, as a whole, and gave its reasoning for the methodology used to determine its number of subscribers in the project as compared to staff's number used in the draft Resolution. Lastly, Verizon claimed exemption from California Environmental Quality Act requirements based on R.06-10-006 which states certain incumbent carriers, like Verizon, have Certificates of Public Convenience and Necessity and possess no restrictions on construction of facilities.

III. Esplanade.US, Inc. (Esplanade)

Esplanade submitted comments which clarified its existing span of service provided in and around The Sea Ranch. It attested that the area is cooperatively served by 3/1 mbps internet broadband from CVC and its own company. Esplanade explained in detail the background of the physical geography of The Sea Ranch and how the two broadband providers offer cable and wireless services which cooperatively work to serve the total footprint. Therefore, Esplanade objected to CASF funding of Verizon's project in The Sea Ranch because the community is already served.

Reply Comments

I. CVC

In reply comments, CVC reiterated that it is the incumbent local cable television and internet provider offering broadband service to The Sea Ranch residents that meets the state's 3/1 CASF definition. CVC included speed test data, three samples for each of eight separate locations performed for three days along with the results of one open

download trunk test. CVC performed these tests in neighborhoods identified as underserved in draft Resolution (Revision 1).

II. Verizon

Verizon argued that The Sea Ranch area is underserved by the fact that 3/1 speed is not ubiquitous in the development, per CVC's opening comments discussing the area's topography and the cooperative relationship with Esplanade, the local wireless provider. In addition to proposing broadband service, Verizon states that it can remedy The Sea Ranch's overall system capacity and improve reliability and access for other ISPs because construction of this CASF project will tie into the general backhaul. The project's targeted 7 mbps download and 768 kbps upload may not exactly meet the 3/1 benchmark but the benchmark is not absolute.

III. The Sea Ranch Association (TSRA)

TSRA submitted comments which included background on the community and its interest in this application; assertion that the area is underserved; and, an attempt to identify truly unserved areas. The Sea Ranch is a rural planned community on the coast and TSRA estimates that about one-third (or, about 581) of the 1,760 homes are occupied full-time. The rest of the homes are weekend or vacation residences. TSRA claimed that 3/1 speeds cannot be verified and are not consistent. In support, TSRA submitted data of speed tests run at four locations over 17 days between November 3 and December 5, 2009. Lastly, TSRA attempted to isolate and identify truly unserved areas. However, it stated it needed the equivalent of company billing data which was impossible to obtain.

IV. The Division of Ratepayer Advocates (DRA)

DRA submitted comments focused on differences between the first two draft Resolutions and data for the project budget and the number of households to be served. It also stated that The Sea Ranch area required further verification of whether it was truly underserved.

Staff Responses on Comments Filed

CD staff investigated the speed test data submitted by each party and, when necessary, requested additional data or communicated with each party to clarify information. Speed tests in specific spot locations by parties, including residents' own tests, confirm that 3/1 speed is attainable in many areas of The Sea Ranch. Using the service territory map and focusing on areas where testing had not occurred previously, CD staff independently contacted 3/1 subscribers to test speeds in real-time and inquire about their broadband speed experience. These resulted in affirming that 3 mbps download and 1 mbps upload is available in portions of The Sea Ranch development. However,

staff's investigation also determined that the Yardarm-94580 cluster in the southern end of the development did not show broadband service being provided at this time. Therefore, the Yardarm-95480 cluster of The Sea Ranch area is recommended for CASF funding.

DRA's comments on the inconsistencies and differences in budget data, square mileage of project, households, pricing, and categorization of The Sea Ranch development related to past and current modifications are now remedied in this Resolution. The inconsistency of household information is a direct result of a prior reduction of square mileage in Cazadero due to an already-existing service territory which prohibits Verizon from receiving CASF funding. Further, in its opening comments, Verizon explained that a miscalculation by staff resulted in the error on household data. This final count of households is reflected in Appendix A. As for budget differences, the reduction in project size does not result in a large reduction in project cost because the major expense of backhaul to be constructed remains nearly the same. The fiber backbone from Cazadero and Timber Cove up to The Sea Ranch and the costs of required environmental studies and permits account for the largest budget expenses of this project.

With respect to Verizon's claim that it does not require CEQA approval since it is the incumbent within the applied-for area, staff reminds Verizon of the fact that CASF awards are discretionary funds from the Commission. Thus the Commission's decision to award CASF funds for a construction project is subject to CEQA. After further discussion, Verizon agreed that the project is subject to CEQA and to work closely with the appropriate lead and responsible agencies to complete environmental review of the project.

Lastly, as a resource tool during this review, CVC submitted a complete footprint of its service territory conforming to the CBTF map format. As a result, CVC's broadband territory is included in the current CBTF statewide map.

Conclusion

The Commission finds CD's recommended CASF fund award for Verizon's The Sea Ranch project covering the Yardarm-95480 area of The Sea Ranch development, Timber Cove, and Cazadero area as discussed in this Resolution and summarized in Appendix A to be reasonable and consistent with Commission orders and, therefore, adopts such award.

Findings

1. The Commission finds Communications Division's (CD) recommended California Advanced Services Fund (CASF) award for The Sea Ranch project of Verizon California, Inc., (U-1002-C) (Verizon) as discussed in this Resolution and summarized in Appendix A reasonable and consistent with Commission orders and, therefore, should be adopted.

2. The CASF was established as a two-year program that will provide matching funds of up to 40% of the total project costs for the deployment of broadband infrastructure in unserved and underserved areas in California, subject to the Commission's completion of review pursuant to the California Environmental Quality Act.
3. Resolution T-17143, approved on June 12, 2008, adopts the application requirements and scoring criteria for the award of funds, a prescribed timeline for other filings, and notifications including a projected Commission Meeting date for final approval of award(s). T-17143 directed interested applicants seeking funding for unserved and underserved projects to file their project proposals and funding requests beginning July 24, 2008.
4. On July 9, 2009, the Commission issued D.09-07-020 approving a new CASF schedule and plan for an additional round of broadband projects that would complement broadband grants awarded under the federal government's American Recovery and Reinvestment Act (ARRA). While retaining the 40% matching grant process, the Commission in this Decision authorized providers an option of seeking a 10% grant from the CASF concurrent with efforts to seek an 80% grant from the ARRA fund.
5. A list of census block groups (CBGs) appeared by county on the Commission's CASF website page under "UNDERSERVED areas proposed to be served as of August 25, 2009: Census Block Groups (CBGs)." The Communications Division (CD) proceeded with its independent review and analysis of this project area to verify that it was underserved as of the applicant's filing date.
6. Verizon filed The Sea Ranch application consisting of three project areas (i.e. The Sea Ranch, Timber Cove, and Cazadero areas) on August 25, 2009 seeking CASF funding for 40% of its project, or \$2,182,800.
7. Verizon California, Inc. plans to construct new fiber optic line extending from the Timber Cove wire center to The Sea Ranch wire center. Connection from Timber Cove south with AT&T's Monte Rio wire center and other leased facilities will enable the backhaul of traffic to Verizon's Novato facilities. Three CBGs will receive at minimum speeds starting at 7 mbps download and 0.768 mbps upload.
8. Unserved areas are defined as areas not served by any form of facilities-based broadband or where internet connectivity is available only through dial-up service or satellite.
9. Underserved areas are defined as areas where broadband are available but no facilities-based provider offers service at speeds of at least 3 mbps download and 1 mbps upload.
10. CD reviewed Verizon California, Inc.'s The Sea Ranch application eligibility through the analysis of required data submitted. These data include, but are not limited to: proof of CPCN registration; descriptions of current and proposed broadband infrastructure; geographic information system (GIS) formatted Shapefiles mapping the subject areas; assertion that the area is underserved; potential subscriber size and household incomes; project construction schedule; project budget; proposed pricing and commitment period for new subscribers; and, financial qualifications of the applicant.

11. Shapefiles, which mapped the broadband deployment, were reviewed by CD using sources including, but not limited to, the United States 2000 Census data, the January, 2008, Broadband Task Force Report, and the revised August 10, 2009, California Broadband Task Force (CBTF) map, among others. These maps helped to verify the existence or non-existence of broadband service areas and broadband speeds, where available.
12. CD verified this project and, when necessary, requested additional information and/or meetings with the applicant to clarify its project proposal. Of the three CBGs in this project, two were formally challenged. CD requested additional information to verify the applicant's project proposal against the challenges. Verizon addressed the challenges, determined to remove project areas to resolve overlaps, and modified the project mapping and correlating data including project budget.
13. On November 10, 2009, Verizon modified its project proposal to include four clusters of service in the south of The Sea Ranch community asserting that it is unserved.
14. The area to be served, as modified, spans 20 square miles and the project will deliver service to 232 households.
15. The total project cost of the Sea Ranch application, which consists of three service areas (The Sea Ranch/Yardarm-95480, Timber Cove, and Cazadero areas) is \$3,548,175 with the 40% CASF subsidy amounting to \$1,419,270 and Contribution in Aid of Construction amounting to \$452,747 for a total CASF fund request of \$1,872,017.
16. After its independent review, CD determined Verizon's The Sea Ranch project, as modified, covering three CBGs eligible to receive funding under CASF.
17. This project is subject to the California Environmental Quality Act (CEQA) requirements. The Commission cannot authorize the disbursement of funds, and Verizon cannot conduct ground disturbing activities, until the completion of CEQA review.
18. Verizon California, Inc. should comply with all guidelines, requirements, and conditions associated with the granting of CASF funds as specified in Resolution T-17143 including the submission of FCC Form 477 and compliance with the CEQA, among others.
19. The posting of a performance bond is not required because Verizon California, Inc. indicated that its match of the 60% of the total project costs will come from its existing capital budget.
20. A notice letter was emailed on November 13, 2009, informing a) all CASF applicants filing under D. 09-07-020 and b) parties on the service list of R.06-06-028 of the availability of the draft of this Resolution for public comments at the Commission's website <http://www.cpuc.ca.gov/static/documents/index.htm>. This letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at this same website.
21. Comments filed by parties are addressed in this Resolution.

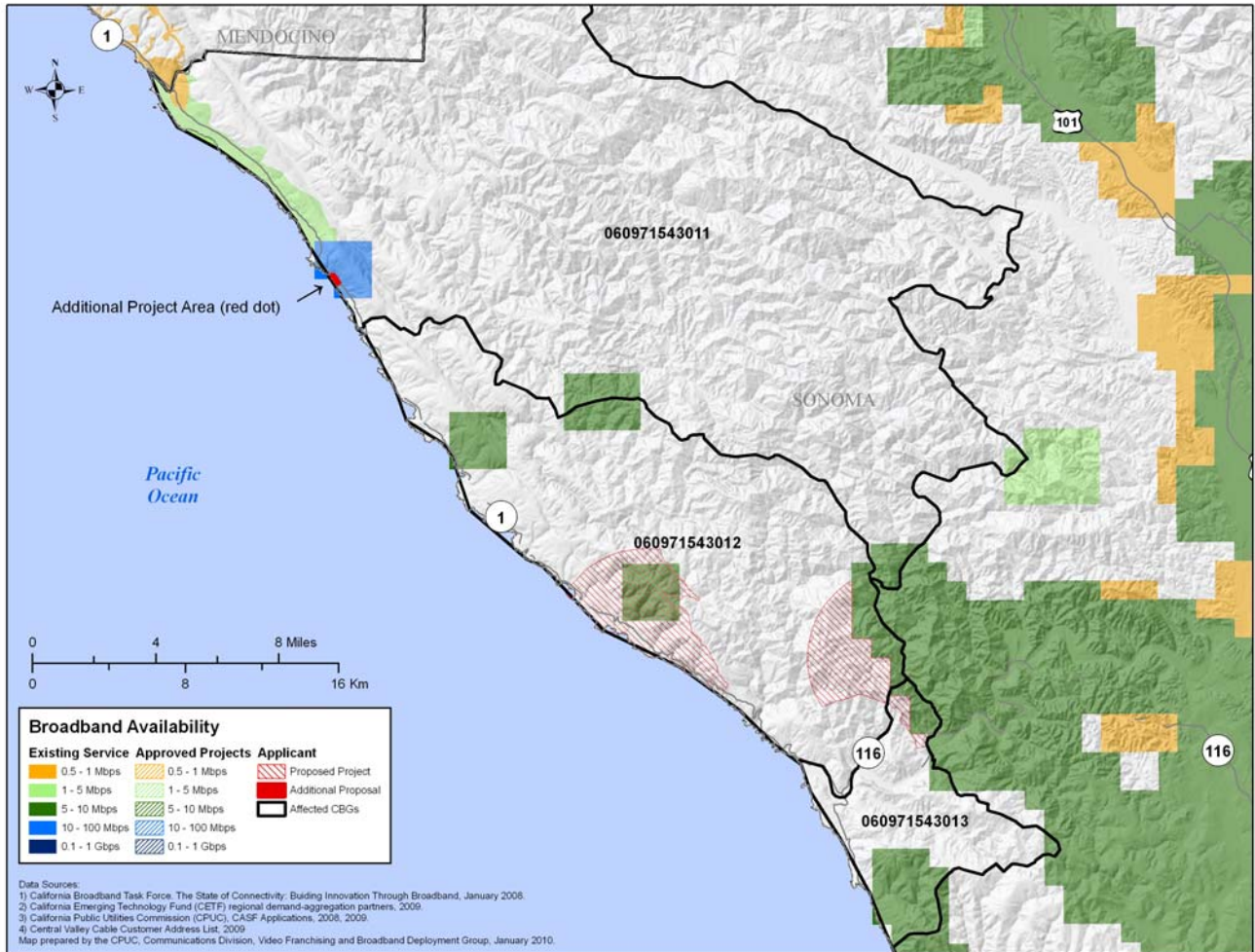
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CD/ABA

Commissioners

APPENDIX A
Resolution T- 17238
Verizon California, Inc. (U-1002-C)
The Sea Ranch Project - Key Information

| | | | |
|-----------|---|--|--|
| 1 | Project ID | Verizon California, Inc. | |
| 2 | Project Name | The Sea Ranch Project | |
| 3 | Project Plan | Construction of new fiber optic line extending from the Timber Cove wire center to The Sea Ranch wire center. Installation includes underground and aerial facilities within and adjacent to the Caltrans Highway 1 Right-of-Way. Connection with AT&T's Monte Rio wire center and other leased facilities will enable the backhaul of traffic to Verizon's Novato facilities. | |
| 4 | Project Size (in square miles) | 20 | |
| 5 | Download speed | 7.0 mbps | |
| 6 | Upload speed | 0.768 mbps | |
| 7 | Location | Sonoma County | |
| a) | Community Name | | |
| | | Timber Cove | |
| | | Cazadero | |
| | | The Sea Ranch/Yardarm-95480 | |
| b) | CBGs | | |
| | | 60971543011 | |
| | | 60971543012 | |
| | | 60971543013 | |
| c) | ZIP Codes | | |
| | | 95412 | |
| | | 95421 | |
| | | 95450 | |
| | | 95497 | |
| 8 | Estimated Potential Subscriber Size | | |
| a) | Households | 232 | |
| b) | Deployment Schedule (from Commission approval) | 10 months | |
| 9 | Proposed Project Budget | | |
| a) | Total | \$3,548,175 | |
| b) | CASF (40%) | \$1,419,270 | |
| c) | Contribution in Aid of Construction (CIAC) | \$452,747 | |
| d) | Amount of CASF Funds Requested | \$1,872,017 | |
| e) | Internally funded (60%) | \$1,676,158 | |

APPENDIX A
Resolution T- 17238
Verizon California, Inc. (U-1002-C)
The Sea Ranch Project
Shapefiles



APPENDIX A
Resolution T- 17238
Verizon California, Inc. (U-1002-C)
The Sea Ranch Project - Statewide Map



END OF APPENDIX A