



CITY OF GRASS VALLEY
ADMINISTRATION
125 East Main Street
Grass Valley, CA 95945
(530)274-4310

Council Members
Jan Arbuckle, Mayor
Hilary Hodge, Vice Mayor
Bob Branstrom
Haven Caravelli
Tom Ivy

March 12, 2024

Attn: Honorable President Alice Bushings Reynolds
California Public Utilities Commission
505 Van Ness Avenue San Francisco, CA 94102

RE: Letter of Comment and Opposition to Pacific Bell Telephone Company d/b/a AT&T California amended application for targeted relief from its Carrier of Last Resort obligation and certain associated tariff obligations.

Dear President Reynolds and Honorable Commissioners,

The City of Grass Valley, representing our residents, is passionately opposing Pacific Bell Telephone Company, also known as AT&T's applications seeking the relinquishment of their Carrier of Last Resort (COLR) and Eligible Telecommunications Carrier (ETC) designations. We urge the California Public Utilities Commission (CPUC) to reject these requests.

As the current COLR for Grass Valley and Nevada County, AT&T is obligated to provide "Plain Old Telephone Services" (POTS) to all residents and businesses. These services, with minimum requirements, are not extended to newer technologies like cell or Voice Over Internet Protocol (VoIP). AT&T's application lists several communities and surrounding areas, including Alta Sierra, Floriston, Grass Valley, Kingvale, Lake Wildwood, Lake of the Pines, Nevada City, North San Juan, Penn Valley, Rough and Ready, Soda Springs, and the Town of Truckee, as areas at risk of losing service. This could leave thousands without any alternative to POTS telecommunication, particularly in rural and vulnerable areas where POTS remains the sole reliable option for emergency communication.

AT&T's claim that only 7% of households in California use outdated copper-based technology is misleading. Rural regions like Grass Valley and Nevada County heavily rely on POTS due to topographical challenges and insufficient profitability for ISPs to invest in broadband infrastructure, resulting in limited or no broadband service for VoIP or wireless technologies.

Moreover, our region, prone to catastrophic wildfires, necessitates reliable communication during emergencies. VoIP phones, dependent on internet connection, become ineffective during power outages or Public Safety Power Shutoffs (PSPS), endangering community lives and impeding first responders. If CPUC approves AT&T's withdrawal as COLR and ETC, telecommunication networks could cease within six months, severely impacting our community's ability to respond during crises.

We assert that COLR and ETC relief must not be granted without establishing widespread alternatives with uniform technology-neutral minimum service quality standards. Therefore, we urge CPUC to deny AT&T's applications seeking the release of COLR and ETC designations.

Thank you for your consideration.

Sincerely,

Jan Arbuckle
Mayor
City of Grass Valley