



*Rio Dell City Hall
675 Wildwood Avenue
Rio Dell, CA 95562
(707) 764-3532
cityofriodell.ca.gov*

February 20, 2024

TO: Rio Dell City Council

FROM: Kyle Knopp, City Manager

SUBJECT: Approve Letter of Opposition to AT&T "Land Line" Service Discontinuation Application with the California Public Utilities Commission

IT IS RECOMMENDED THAT THE CITY COUNCIL:

Approve the letter or provide direction to staff.

BACKGROUND AND DISCUSSION

Attached to your agenda is a CPUC Fact Sheet on the matter.

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Feb. 20, 2024

Members, California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: AT&T COLR application - Oppose

Dear Members of the Public Utilities Commission,

On behalf of the City of Rio Dell and as a concerned resident of this City and Humboldt County, I write to strongly request your opposition to AT&T California's application to terminate its Carrier of Last Resort (COLR) obligation. The potential implications for our community are deeply concerning, and I urge you to consider the specific challenges faced by residents and businesses in Rio Dell.

AT&T's application seeks relief from its COLR obligations in over 99% of its service territory, where AT&T believes alternative voice providers exist, without requesting a replacement COLR. This proposal, if approved, could allow AT&T to cancel service to its Plain Old Telephone Service (POTS) customers as early as 6 months, leaving rural customers in Humboldt County and Rio Dell particularly vulnerable.

Rio Dell, with its diverse and sprawling landscapes, relies heavily on landline services, especially in remote and rural areas where alternatives may be limited. During emergencies, such as natural disasters or power outages, access to reliable 911 and 211 services is paramount, and POTS remains the most dependable communication tool in our safety net arsenal. The unavailability of cell service after the December 2022 earthquake underscored the importance of maintaining reliable landline services, as many residents were left without means of communication during a time of crisis.

Additionally, alternative technologies proposed by AT&T do not offer commensurate regulatory treatment or consumer protections, further jeopardizing the safety and accessibility of communication services in our community.

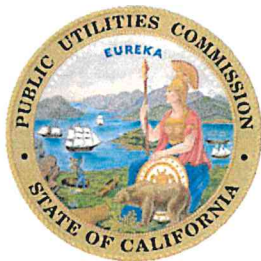
Furthermore, AT&T's application fails to address the unique needs of our elderly, vulnerable, and disadvantaged populations, who may struggle to find suitable alternative services in the event of service termination. The potential withdrawal of wireline infrastructure without adequate replacement options could leave entire neighborhoods in Rio Dell without telecommunications options, compromising public safety and economic development.

It is imperative that the CPUC prioritize the interests of residents and businesses in Rio Dell by rejecting AT&T's application and preserving the existing COLR obligation. Rio Dell is committed to providing reliable, secure, and open networks to all citizens, and AT&T's proposal undermines these efforts.

In the face of these challenges, the Rio Dell City Council respectfully urges the CPUC help protect the residents of Rio Dell. Rejecting AT&T's application would ensure the continued provision of reliable, accessible, and affordable telephone services for those who depend on the existing COLR obligation.

Sincerely,

Debra Garnes
Mayor
City of Rio Dell



CPUC Fact Sheet

PUBLIC PARTICIPATION HEARING

AT&T's Applications for Targeted Relief from its Carrier of Last Resort Obligation and Relinquish its Eligible Telecommunications Carrier Designation (A.23-03-003 and A.23-03-002)

AT&T's application regarding Carrier of Last Resort Obligations (A.23-03-003)

In this application, AT&T requests to be relieved of its Carrier of Last Resort (COLR) obligations in certain areas of California. If approved, it would no longer be required to offer landline telephone service where it is currently required to offer Basic Service in those areas. Basic Service includes nine service elements such as Lifeline rates for eligible customers, free access to 9-1-1, Telephone Relay Service, and directory and operator services. More information on Basic Service is available at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/broadband-mapping-program/broadband-public-feedback/basic-service-definition>.

What is a Carrier of Last Resort (COLR)? A COLR is a telecommunications service provider that stands ready to provide basic telephone service, commonly landline telephone service, to any customer requesting such service within a specified area. At least one telephone company in a specified area is legally required to provide access to telephone service to anyone in its service territory who requests it. This is known as the Carrier of Last Resort (COLR) obligation which ensures that everyone in California has access to safe, reliable, and affordable telephone service. AT&T is the designated COLR in many parts of the state and is the largest COLR in California. Where AT&T is the default landline telephone service provider means that the company must provide traditional landline telephone service to any potential customer in that service territory. AT&T is proposing to withdraw as the COLR in your area without a new carrier being designated as a COLR.

What areas are impacted by AT&T's request to withdraw as a COLR? [Here](#) is the list of census designated places where AT&T is requesting to withdraw as the designated COLR and [here](#) is an online version of the map with address lookup.

What might happen if AT&T withdraws as a COLR? An area without a COLR could mean that there would be no landline telephone company serving that area and that there could possibly be no landline telephone access for customers in that area. If AT&T's proposal were accepted as set forth in its application, then no COLR would be required to provide basic service in your area. This does not necessarily mean that no carriers would, in fact, provide service in your area—only that they would not be required to do so. Other outcomes are possible, such as another carrier besides AT&T volunteering to become the COLR in your area, or the CPUC denying AT&T's proposal.

AT&T's application regarding Eligible Telecommunication Carrier Designation (A.23-03-002)

On March 3, 2023, AT&T requested to give up its designation as an Eligible Telecommunications Carrier (ETC).

What is an ETC? An ETC is a telephone company operating in a specific geographic area, that receives financial assistance from the federal government-established Universal Service Fund to provide high quality, and affordable telephone service to customers at all income levels in specific geographic areas. One example of a program funded by the Universal Service Fund is federal Lifeline. While funding for this program is provided by the federal government, each state determines a telephone company's eligibility for ETC designation. In California, a company's eligibility for these federal funds is determined by the CPUC.

Does an ETC provide California LifeLine? In California, the CPUC also approves and denies applications for state funding for programs to provide universal support, including California LifeLine (California's program is called LifeLine with a capital "L" for "Line"). The California LifeLine program is separate from the federal Lifeline program. An ETC may be a provider of California LifeLine as well as federal Lifeline, but eligibility to provide California LifeLine is not limited to only ETC providers.

What is AT&T's request in this application? AT&T is applying to give up its ETC designation, which would allow it to no longer offer federal Lifeline, as well as other federal programs designed to subsidize telecommunications support for low-income individuals and individuals located in remote areas. AT&T's participation in the California LifeLine program is a separate matter from this application to give up its ETC designation. AT&T asserts that it is not necessary to keep its ETC designation because it no longer receives any federal high-cost support from the federal government to provide universal service. By relinquishing its ETC designation, AT&T will no longer be eligible to receive federal support to provide Lifeline, which could potentially affect all current AT&T Lifeline customers.

What areas are impacted by AT&T's request to give up its ETC designation? All areas of AT&T's service territory where it currently holds ETC designation, which is the same as its Carrier of Last Resort (COLR) service territory, could be impacted if the CPUC approves AT&T's application. Here is a map of the different COLR service territories in California, including AT&T's: https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/high-cost-support-and-surcharges/chcf-a-1/ilec-territories-2023_230412.pdf

What are the potential impacts on customers' bills? For a household receiving federal Lifeline from AT&T, the bill could increase by \$5.25 per month for voice-only service, or \$9.25 per month for bundled or internet service. In addition to these amounts, a household on Tribal lands receiving federal Lifeline from AT&T could experience an additional \$25 per month bill increase.

What is required of AT&T for the CPUC to approve AT&T's request? AT&T must demonstrate that another ETC provider can provide universal support in the areas where AT&T wishes to surrender its ETC designation.

For more information on Eligible Telecommunications Carrier designation, please visit <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/service-quality-and-etc/eligible-telecommunications-carrier>

Public Participation Hearings

The public participation hearings (PPHs) provide an opportunity for the public to communicate directly with the CPUC regarding AT&T applications to remove its obligations under California to provide voice services.

WHEN	FORMAT	LOCATION
February 6, 2024, 2 p.m. and 6 p.m.	In-person only	Clovis City Council Chambers 1033 5th Street, Clovis, CA 93612
February 22, 2024, 2 p.m. and 6 p.m.	In-person only	Mendocino County Board of Supervisors 501 Low Gap Road, Room 1070, Ukiah, CA 95482
March 14, 2024, 2 p.m. and 6 p.m.	In-person only	Indio City Hall Council Chambers 100 Civic Center Mall, Indio, CA 92201
March 19, 2024, 2 p.m. and 6 p.m.	Virtual only	1-800-857-1917 Passcode: 6032788# www.adminmonitor.com/ca/cpuc

Consistent with the PPHs' purpose of hearing from members of the public, representatives of parties already involved in this proceeding are not permitted to comment at the PPH. More information at www.cpuc.ca.gov/pph

Other Ways to Participate

Subscribe to receive documents in A.23-03-003 and A.23-03-002 at: subscribecpuc.cpuc.ca.gov/fpss/Default.aspx

Submit comments electronically to the CPUC using the "Add Public Comment" button on the "Public Comment" tab of the Docket Card for A.23-03-003 at apps.cpuc.ca.gov/c/A2303003 and A.23-03-002 at apps.cpuc.ca.gov/c/A2303002. You can also review other public comments related to this rulemaking. The public may submit multiple public comments throughout the proceeding.

Contact the CPUC's Public Advisor at:

- Phone: 1-866-849-8390 (toll-free) or 1-415-703-2074
- TTY: 1-866-836-7258 (toll-free) or 1-415-703-5282
- Mail: CPUC Public Advisor's Office, 505 Van Ness Avenue, San Francisco, CA 94102
- Email: public.advisor@cpuc.ca.gov

Please reference AT&T's Applications 23-03-003 and 23-03-002 in any communication with the CPUC.