

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 23, 2015

Corby Erwin
Plumas-Sierra Telecommunications
P.O. Box 1057
73233 State Route 70
Portola, CA 96122

RE: California Advance Services Fund (CASF) - Proposed Plumas/Sierra/Lassen CASF Application of February 2015.

Thank you for your February 27, 2015, CASF grant application to serve portions of Plumas, Sierra and Lassen counties. As you know, the proposed project area was challenged by Digital Path and Frontier Communications.

After reviewing the application, data included in the California Interactive Broadband Map, and information submitted by the challengers as part of their challenges to the proposed project, the Communications Division (CD) staff determined that significant portions of the project area, including areas with the majority of households, are ineligible for funding consideration because those areas are currently served.

Based on a review of the data submitted by the Digital Path, including more than 250 speed tests in your proposed project area, CD staff has upheld DigitalPath's claims of service in the census blocks in Appendix A. CD has also upheld Frontier's claims of service, as supported by speed tests and shown in Appendix B. As these areas contain the bulk of households in the project area, CD is putting its analysis of the application on hold.

Should Plumas-Sierra Telecommunications not agree that the areas in question are served, it must provide evidence to the contrary. On the following pages is guidance outlining how to supply evidence to refute the challengers' tests, as well as general locations of the Digital Path and Frontier testing (actual test sites are proprietary because they contain customer addresses). CD may re-open its review of PST's application if it is satisfactorily demonstrated that the challengers do not serve the contested portions of your proposed project area.

Please contact CD before close of business on December 7, 2015, to inform us whether or not you wish to rebut the challengers' claims. If you do not, we will consider the application withdrawn. Any evidence rebutting the claims must be submitted on or before close of business on December 23, 2015.

You are also welcome to resubmit the project with revised customer and budget estimates, after excising all successfully challenged areas, while the current application window remains open.

If you need any additional information or clarification, please contact me at (415) 703-1568.

Thank you for your interest in the CASF program.

Sincerely,

A handwritten signature in blue ink that reads "John Baker". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Baker, Regulatory Analyst
California Advanced Services Fund
California Public Utilities Commission

cc: Andrew Cardin, DigitalPath
Charlie Born, Frontier Communications

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Guidelines for demonstrating CASF eligibility for Plumas-Sierra Telecommunications in response to DigitalPath and Frontier tests showing service

November 23, 2015

In order to counter challengers' claims of service, Plumas-Sierra Telecommunications must provide sample addresses of homes in the challenged areas that do not have the ability to subscribe to and/or achieve service with Internet speeds of at least 6 mbps down/1.5 mbps up.

The evidence for any addresses that do not have access to served speeds may include one or more of the following:

1. Proof of "denial of service" by Frontier or DigitalPath such as e-mails, call logs, or print materials documenting the denial to residents or businesses.
2. Proof of speeds below 6/1.5 Mbps based on tests using CalSPEED. These tests must be associated with specific addresses and should be approached as follows:
 - i. Must test from homes that subscribe at served speeds, and can document their subscribed speeds (*e.g.*, copy of their latest bill showing the service/speed to which subscribed).
 - ii. Use <http://calspeed.org>. The computer needs to be hard-wired to the modem (*i.e.*, not through wi-fi).
 - iii. Addresses must be entered in the online app.

If the evidence described in sections 1 and 2 of these guidelines is provided, then PST may also voluntarily include anecdotal accounts of DigitalPath or Frontier service being unavailable at served speeds (*e.g.*, letters from residents). These letters or other anecdotal records will not substitute for the addresses, denial of service, and proof of speeds below the served threshold.

The Communications Division requests these test results by close of business on Wednesday, December 23, 2015. If more time is needed, please request an extension from the CASF Team (through John Baker and Selena Huang).

Appendix A

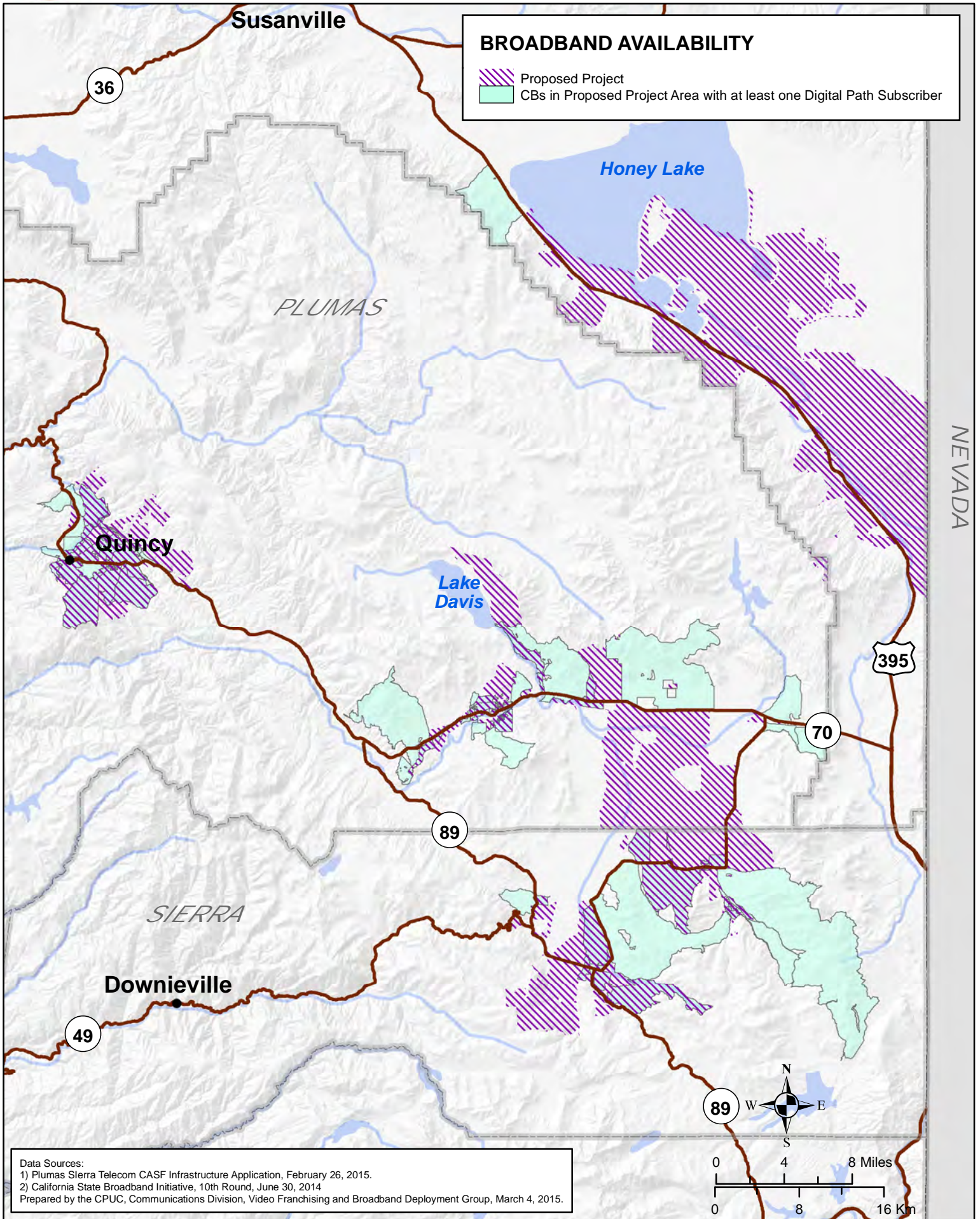
DigitalPath, as determined by affirmed statements and submitted speed tests, has demonstrated that it has service in the following census blocks. Map on following page.

060350406001302	060630001003019	060630001006007	060910100001043
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060350406003042	060630001003028	060630001006063	060910100001123
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060630001001006	060630001004006	060630001006081	060910100002035
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060630001001055	060630001004027	060630003002070	060910100005011
060630001001057	060630001005000	060630003003026	060910100005029
060630001002001	060630001005011	060630003003077	060910100005062
060630001002003	060630001005013	060630003004411	060910100005063
060630001002005	060630001005014	060630003004430	060910100005067
060630001002012	060630001005017	060630003004443	060910100005071
060630001002014	060630001005018	060630003004444	060910100005076
060630001003006	060630001005025	060630003004445	
060630001003008	060630001005028	060630003004604	



CASF - PROPOSED INFRASTRUCTURE PROJECT

Plumas Sierra Last Mile Project - February 26, 2015



Data Sources:
 1) Plumas Sierra Telecom CASF Infrastructure Application, February 26, 2015.
 2) California State Broadband Initiative, 10th Round, June 30, 2014
 Prepared by the CPUC, Communications Division, Video Franchising and Broadband Deployment Group, March 4, 2015.

Appendix B

Frontier Communications, as determined by affirmed statements and submitted speed tests, has demonstrated that it has service in the following census blocks. Map on page following this list.

060350406001157	060350406001194	060350406002245	060350406002281
060350406001158	060350406001195	060350406002246	060350406002282
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060350406001162	060350406001199	060350406002250	060350406002286
060350406001163	060350406001200	060350406002251	060350406002287
060350406001164	060350406001201	060350406002252	060350406002288
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060350406001166	060350406001208	060350406002254	060350406002290
060350406001167	060350406001209	060350406002255	060350406002291
060350406001168	060350406001213	060350406002256	060350406002292
060350406001169	060350406001261	060350406002257	060350406002293
060350406001171	060350406001262	060350406002258	060350406002294
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060350406001184	060350406002235	060350406002271	060350406002307
060350406001185	060350406002236	060350406002272	060350406002308
060350406001186	060350406002237	060350406002273	060350406002309
060350406001187	060350406002238	060350406002274	060350406002310
060350406001188	060350406002239	060350406002275	060350406002311
060350406001189	060350406002240	060350406002276	060350406002312
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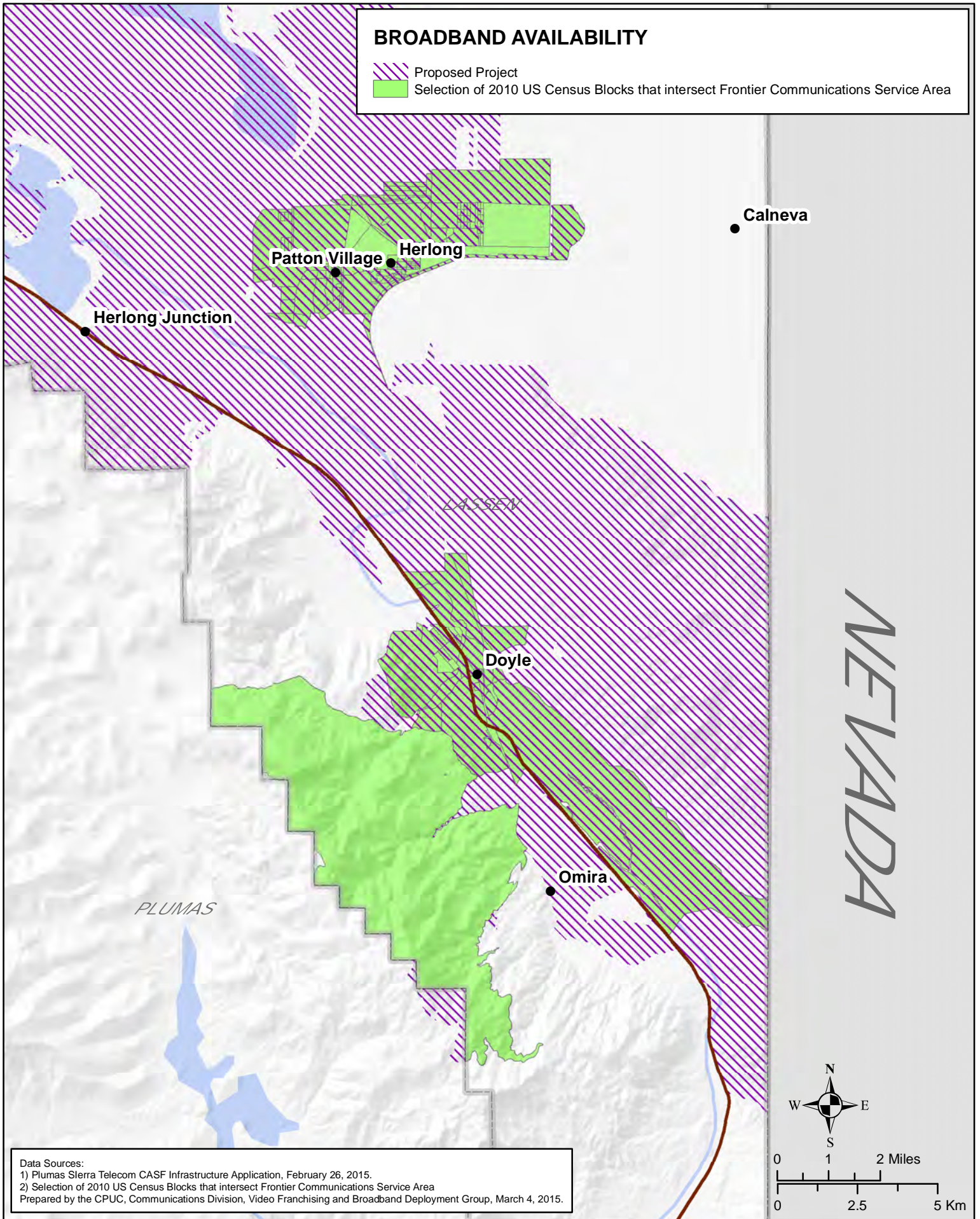
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CASF - PROPOSED INFRASTRUCTURE PROJECT Plumas Sierra Last Mile Project - February 26, 2015

BROADBAND AVAILABILITY

-  Proposed Project
-  Selection of 2010 US Census Blocks that intersect Frontier Communications Service Area



Data Sources:
 1) Plumas Sierra Telecom CASF Infrastructure Application, February 26, 2015.
 2) Selection of 2010 US Census Blocks that intersect Frontier Communications Service Area
 Prepared by the CPUC, Communications Division, Video Franchising and Broadband Deployment Group, March 4, 2015.

