



Ms. Clover Sellden
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RE: Comments on Draft White Paper “High Impact Areas for Broadband Availability”

When considering “high impact” areas, the CPUC must thoughtfully consider potential social impacts like public safety, as well as challenges to broadband adoption – including low income areas, remote rural areas, regions lacking adequate middle mile infrastructure, challenging terrain, and low household density, among other factors.

“Best bang for the buck” must be measured in relation to the program goals, to maximize the public good, not merely to deliver the highest number of households connected. Rather than excluding them as uneconomic, we believe that CPUC must prioritize areas with low density and challenging terrain, including low income households, historically disenfranchised, Tribal, and other communities with demographic indicators that reflect challenges to broadband adoption.

Rather than “think like an ISP,” we hope that CPUC can “think like a community anchor” seeking to serve every local resident by leveraging community investments. Further, we recommend that CASF prioritize local ownership and projects that benefit community anchor institutions that currently lack high capacity broadband. One way to maximize impact of CASF would be to fund those underserved community anchors to develop local network infrastructure to help meet local needs.

Future adoption should be considered along with deployment - people need access to affordable, open, secure internet connections that respect consumer privacy. Ultimately, CASF can create higher impact by supporting open networks that provide affordable services and by working to enhance competition, diversity and localism in the marketplace of ideas.

Your thoughtful consideration is greatly appreciated. Please feel free to contact me directly if you have questions – my cell: 707-616-2381, e: sean@accesshumboldt.net.

Sincerely,

Sean Taketa McLaughlin
Executive Director