

CITY OF SEBASTOPOL CITY COUNCIL

AGENDA ITEM REPORT FOR MEETING OF: April 2, 2024

To: Honorable Mayor and City Councilmembers
From: Councilmember Maurer/Mayor Rich
Subject: Resolution Stating City's Opposition to AT&T Applications: Relief of "Carrier of Last Report" and Eligible Telecommunications Carrier Designation.

RECOMMENDATIONS: That the City Council consider the request from Councilmember Maurer for Approval of Resolution stating the City's Opposition to AT&T Applications: Relief of "Carrier of Last Report" and Eligible Telecommunications Carrier Designation.

EXECUTIVE SUMMARY:

AT&T has requested to be relieved of its Carrier of Last Resort (COLR) obligations in certain areas of California. If approved, AT&T California (landline service, separate from cellular) 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.

BACKGROUND AND DISCUSSION:

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.

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 an area, or the CPUC denying AT&T's proposal.

In addition, on March 3, 2023, AT&T requested to give up its designation as an Eligible Telecommunications Carrier (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.

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.

Per information received from Councilmember Maurer, the Santa Cruz Board of Supervisors (SC BOS) adopted a resolution asking the CPUC to deny AT&T's applications to discontinue landline service. This proposed resolution for Sebastopol is adapted in part from the SC BOS resolution. It differs in that it references local emergency situations. The City of Berkeley also opposes AT&T landline withdrawal as well as the Town of Fairfax opposing the same.

Sebastopol is partially served with fiber optics, and also served by copper cable. See attached map, which was taken from: <https://www.broadbandsearch.net/service/california/sebastopol>. Councilmember Maurer has confirmed with Sonic that most of the outer areas of Sebastopol are still served by copper. She has also stated that if AT&T discontinues maintenance of the copper lines, residents and businesses are at risk of losing not only landlines, but also internet service.

Councilmember Maurer has provided additional information to this report as well as a DRAFT Resolution for consideration.

COMMUNITY OUTREACH:

This item has been noticed in accordance with the Ralph M. Brown Act and was available for public viewing and review at least 72 hours prior to scheduled meeting date. The City has also used social to promote and advertise the City Council Meeting Agenda Items.

FISCAL IMPACT:

There is no fiscal impact with the action requested tonight.

OPTIONS:

1. That the City Council consider and approve the Resolution; or
2. That the City Council consider and approve Resolution with amendments; or
3. That the City Council deny the request for a Resolution

ATTACHMENTS:

- a. DRAFT Resolution with annotations
 1. CPUC Fact Sheet
 2. Application of Pacific Bell Telephone Company, d/b/a AT&T California (U 1001 C) for Targeted Relief from Its Carrier of Last Resort Obligation and Certain Associated Tariff Obligations
 3. Summary of Party Positions
 4. Tubbs Fire Article
 5. Camp Fire Article
- b. Map
- c. County of Santa Cruz Board of Supervisors Resolution
- d. County of Mendocino Board of Supervisors Letter of Opposition
- e. Berkeley City Council Letter of Opposition and News Article

RESOLUTION No XXXX-2024

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SEBASTOPOL
REQUESTING THE CALIFORNIA PUBLIC UTILITIES COMMISSION
DENY AT&T'S APPLICATIONS TO BE RELIEVED OF ITS CARRIER OF LAST
RESORT AND ELIGIBLE TELECOMMUNICATION CARRIER DESIGNATIONS

WHEREAS, AT&T has submitted applications, A.23-03-002 and A.23-03-003, through the California Public Utilities Commission (CPUC) to be relieved of its Carrier of Last Resort (COLR) and Eligible Telecommunication Carrier (ETC) designations in certain areas of California including Sebastopol and surrounding areas without identifying an alternative carrier to assume responsibility for maintaining the landline communication services¹, ² and

WHEREAS, a COLR obligation ensures that everyone in California has access to safe, reliable, and affordable telephone service; and

WHEREAS, 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; and

WHEREAS if approved, AT&T would have no obligation to ensure reliable access to 9-1-1 or LifeLine program discounts; and

WHEREAS landline phones can be more reliable than Voice Over Internet Protocol (VOIP) and wireless cell phones for emergencies, especially during a power outage³; and

WHEREAS during the 2017 Tubbs Fire in Santa Rosa over 70 cell towers were knocked out of operation⁴ and wireless emergency notifications during the 2018 Camp Fire failed⁵; and

WHEREAS, residents and businesses in Sebastopol, including the City of Sebastopol depend on landline phones.

¹ https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/pao/pphs/2024/a2303002-a2303003-pph-fact-sheet_final.pdf

² <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M521/K479/521479757.PDF>

³ <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/documents/pao/party-positions/2024/a2303003-summary-of-party-positions-for-pacific-bell-telephone-company--and-intervenors.pdf>

⁴ <https://norcalpublicmedia.org/2021071464641/news-feed/despite-improvements-since-tubbs-fire-emergency-notifications-remain-imperfect>

⁵ <https://insider.govtech.com/california/news/camp-fire-aftermath-technology-the-thing-i-trust-most-failed.html>

NOW, THEREFORE, BE IT RESOLVED, that the City of Sebastopol requests the CPUC deny AT&T applications, A.23-03-002 and A.23-03-003; and

BE IT FURTHER RESOLVED that the City Clerk mail a physical copy and submit an electronic copy of this Resolution to the CPUC; and

BE IT FURTHER RESOLVED that the City Clerk mail a physical copy and submit an electronic copy of this Resolution to Sonoma County Supervisor Lynda Hopkins.

PASSED AND ADOPTED, by the CITY COUNCIL of THE CITY OF SEBASTOPOL COUNTY OF SONOMA of STATE OF CALIFORNIA on this 2nd day of April 2024.

I, the undersigned, hereby certify that the foregoing Resolution was duly adopted by the City of Sebastopol City Council by the following vote:

VOTE:

Ayes:

Noes:

Absent:

Abstain:

APPROVED: _____
Mayor Diana Gardner Rich

ATTEST: _____
Mary Gourley, MMC, Assistant City Manager / City Clerk

Approved as to Form: _____
Larry McLaughlin, City Attorney



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: subscribe.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.



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED

12/13/23

04:59 PM

A2303003

Application of Pacific Bell Telephone Company
d/b/a AT&T California (U 1001 C) for Targeted
Relief from Its Carrier of Last Resort Obligation
and Certain Associated Tariff Obligations.

A.23-03-003
(Filed March 3, 2023)

**LIST OF CITIES, TOWNSHIPS, VILLAGES, AND OTHER
CENSUS DESIGNATED PLACES FROM WHICH AT&T CALIFORNIA
SEEKS TO WITHDRAW AS THE DESIGNATED COLR**

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Attorneys for AT&T California

December 13, 2023

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Bell Telephone Company
d/b/a AT&T California (U 1001 C) for Targeted
Relief from Its Carrier of Last Resort Obligation
and Certain Associated Tariff Obligations.

A.23-03-003
(Filed March 3, 2023)

**LIST OF CITIES, TOWNSHIPS, VILLAGES, AND OTHER
CENSUS DESIGNATED PLACES FROM WHICH AT&T CALIFORNIA
SEEKS TO WITHDRAW AS THE DESIGNATED COLR**

In compliance with Section 9 and Ruling 6 of the Administrative Law Judge’s Ruling Noticing Public Participation Hearings and Additional Instructions for Applicant dated December 4, 2023, Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) (“AT&T California”) hereby files and serves the attached list of the cities, townships, villages, and other census designated places (each a “Locality”), including surrounding areas,¹ from which it seeks to withdraw as the designated COLR. This list is organized alphabetically by county and then by Locality within each county.

[Signature page follows]

¹ AT&T California included “and surrounding areas” if it also is seeking to withdraw as the designated COLR in any area within five miles of the Locality’s boundaries.

Dated: December 13, 2023

Respectfully submitted,

/s/ Nelsonya Causby

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Attorneys for AT&T California

Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Alameda

Alameda city and surrounding areas
Albany city and surrounding areas
Ashland CDP and surrounding areas
Berkeley city and surrounding areas
Castro Valley CDP and surrounding areas
Cherryland CDP and surrounding areas
Dublin city and surrounding areas
Emeryville city and surrounding areas
Fairview CDP and surrounding areas
Fremont city and surrounding areas
Hayward city and surrounding areas
Livermore city and surrounding areas
Newark city and surrounding areas
Oakland city and surrounding areas
Piedmont city and surrounding areas
Pleasanton city and surrounding areas
San Leandro city and surrounding areas
San Lorenzo CDP and surrounding areas
Sunol CDP and surrounding areas
Union City city and surrounding areas

Alpine

Bear Valley CDP and surrounding areas

Amador

Amador City city and surrounding areas
Buena Vista CDP and surrounding areas
Camanche North Shore CDP and surrounding areas
Camanche Village CDP and surrounding areas
Drytown CDP and surrounding areas
Fiddletown CDP and surrounding areas
Ione city and surrounding areas
Jackson city and surrounding areas
Martell CDP and surrounding areas
Pine Grove CDP and surrounding areas
Plymouth city and surrounding areas
River Pines CDP and surrounding areas
Sutter Creek city and surrounding areas

Butte

Bangor CDP and surrounding areas
Berry Creek CDP and surrounding areas
Biggs city and surrounding areas
Butte Creek Canyon CDP and surrounding areas
Butte Valley CDP and surrounding areas
Cherokee CDP and surrounding areas
Chico city and surrounding areas

Butte

Clipper Mills CDP and surrounding areas
Cohasset CDP and surrounding areas
Concow CDP and surrounding areas
Durham CDP and surrounding areas
Forbestown CDP and surrounding areas
Forest Ranch CDP and surrounding areas
Gridley city and surrounding areas
Honcut CDP and surrounding areas
Kelly Ridge CDP and surrounding areas
Magalia CDP and surrounding areas
Nord CDP and surrounding areas
Oroville East CDP and surrounding areas
Oroville city and surrounding areas
Palermo CDP and surrounding areas
Paradise town and surrounding areas
Rackerby CDP and surrounding areas
Richvale CDP and surrounding areas
Robinson Mill CDP and surrounding areas
South Oroville CDP and surrounding areas
Stirling City CDP and surrounding areas
Thermalito CDP and surrounding areas
Yankee Hill CDP and surrounding areas

Calaveras

Angels city and surrounding areas
Arnold CDP and surrounding areas
Avery CDP and surrounding areas
Dorrington CDP and surrounding areas
Forest Meadows CDP and surrounding areas
Mokelumne Hill CDP and surrounding areas
Mountain Ranch CDP and surrounding areas
Murphys CDP and surrounding areas
Rail Road Flat CDP and surrounding areas
Rancho Calaveras CDP and surrounding areas
San Andreas CDP and surrounding areas
Vallecito CDP and surrounding areas
Valley Springs CDP and surrounding areas
Wallace CDP and surrounding areas

Colusa

Lodoga CDP and surrounding areas
Stonyford CDP and surrounding areas

Contra Costa

Acalanes Ridge CDP and surrounding areas
Alamo CDP and surrounding areas
Alhambra Valley CDP and surrounding areas
Antioch city and surrounding areas

Note: Locality names are based on U.S. Census Bureau's nomenclature. CDP stands for "Census Defined Place."

Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Contra Costa

Bay Point CDP and surrounding areas
Bayview CDP and surrounding areas
Bethel Island CDP and surrounding areas
Blackhawk CDP and surrounding areas
Brentwood city and surrounding areas
Byron CDP and surrounding areas
Camino Tassajara CDP and surrounding areas
Castle Hill CDP and surrounding areas
Clayton city and surrounding areas
Clyde CDP and surrounding areas
Concord city and surrounding areas
Contra Costa Centre CDP and surrounding areas
Crockett CDP and surrounding areas
Danville town and surrounding areas
Diablo CDP and surrounding areas
Discovery Bay CDP and surrounding areas
East Richmond Heights CDP and surrounding areas
El Cerrito city and surrounding areas
El Sobrante CDP and surrounding areas
Hercules city and surrounding areas
Kensington CDP and surrounding areas
Knightsen CDP and surrounding areas
Lafayette city and surrounding areas
Martinez city and surrounding areas
Montalvin Manor CDP and surrounding areas
Moraga town and surrounding areas
Mountain View CDP and surrounding areas
Norris Canyon CDP and surrounding areas
North Gate CDP and surrounding areas
North Richmond CDP and surrounding areas
Oakley city and surrounding areas
Orinda city and surrounding areas
Pacheco CDP and surrounding areas
Pinole city and surrounding areas
Pittsburg city and surrounding areas
Pleasant Hill city and surrounding areas
Port Costa CDP and surrounding areas
Reliez Valley CDP and surrounding areas
Richmond city and surrounding areas
Rodeo CDP and surrounding areas
Rollingwood CDP and surrounding areas
San Miguel CDP and surrounding areas
San Pablo city and surrounding areas
San Ramon city and surrounding areas
Saranap CDP and surrounding areas
Shell Ridge CDP and surrounding areas
Tara Hills CDP and surrounding areas

Contra Costa

Vine Hill CDP and surrounding areas
Walnut Creek city and surrounding areas

El Dorado

Auburn Lake Trails CDP and surrounding areas
Cameron Park CDP and surrounding areas
Camino CDP and surrounding areas
Cold Springs CDP and surrounding areas
Coloma CDP and surrounding areas
Diamond Springs CDP and surrounding areas
El Dorado Hills CDP and surrounding areas
Georgetown CDP and surrounding areas
Grizzly Flats CDP and surrounding areas
Meyers CDP and surrounding areas
Placerville city and surrounding areas
Pollock Pines CDP and surrounding areas
Shingle Springs CDP and surrounding areas
South Lake Tahoe city and surrounding areas
Tahoma CDP and surrounding areas

Fresno

Calwa CDP and surrounding areas
Caruthers CDP and surrounding areas
Clovis city and surrounding areas
Coalinga city and surrounding areas
Del Rey CDP and surrounding areas
Easton CDP and surrounding areas
Firebaugh city and surrounding areas
Fort Washington CDP and surrounding areas
Fresno city and surrounding areas
Huron city and surrounding areas
Kingsburg city and surrounding areas
Lanare CDP and surrounding areas
Laton CDP and surrounding areas
Malaga CDP and surrounding areas
Mayfair CDP and surrounding areas
Mendota city and surrounding areas
Millerton CDP and surrounding areas
Old Fig Garden CDP and surrounding areas
Orange Cove city and surrounding areas
Parlier city and surrounding areas
Raisin City CDP and surrounding areas
Riverdale CDP and surrounding areas
Sanger city and surrounding areas
Selma city and surrounding areas
Squaw Valley CDP and surrounding areas
Sunnyside CDP and surrounding areas
Tarpey Village CDP and surrounding areas

Note: Locality names are based on U.S. Census Bureau's nomenclature. CDP stands for "Census Defined Place."

Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Fresno

West Park CDP and surrounding areas
Westside CDP and surrounding areas

Glenn

Artois CDP and surrounding areas
Elk Creek CDP and surrounding areas
Hamilton City CDP and surrounding areas
Orland city and surrounding areas
Willows city and surrounding areas

Humboldt

Arcata city and surrounding areas
Bayview CDP and surrounding areas
Big Lagoon CDP and surrounding areas
Blue Lake city and surrounding areas
Cuttan CDP and surrounding areas
Eureka city and surrounding areas
Fairhaven CDP and surrounding areas
Fieldbrook CDP and surrounding areas
Fields Landing CDP and surrounding areas
Fortuna city and surrounding areas
Humboldt Hill CDP and surrounding areas
Hydesville CDP and surrounding areas
Indianola CDP and surrounding areas
Loleta CDP and surrounding areas
Manila CDP and surrounding areas
McKinleyville CDP and surrounding areas
Miranda CDP and surrounding areas
Myers Flat CDP and surrounding areas
Myrtletown CDP and surrounding areas
Phillipsville CDP and surrounding areas
Pine Hills CDP and surrounding areas
Redcrest CDP and surrounding areas
Rio Dell city and surrounding areas
Samoa CDP and surrounding areas
Scotia CDP and surrounding areas
Trinidad city and surrounding areas
Weott CDP and surrounding areas
Westhaven-Moonstone CDP and surrounding areas

Imperial

Bombay Beach CDP and surrounding areas
Brawley city and surrounding areas
Calexico city and surrounding areas
Calipatria city and surrounding areas
El Centro Naval Air Facility CDP and surrounding areas

Imperial

El Centro city and surrounding areas
Heber CDP and surrounding areas
Holtville city and surrounding areas
Imperial city and surrounding areas
Niland CDP and surrounding areas
Ocotillo CDP and surrounding areas
Seeley CDP and surrounding areas
Westmorland city and surrounding areas

Inyo

Shoshone CDP and surrounding areas
Tecopa CDP and surrounding areas

Kern

Arvin city and surrounding areas
Bakersfield Country Club CDP and surrounding areas
Bakersfield city and surrounding areas
Bear Valley Springs CDP and surrounding areas
Benton Park CDP and surrounding areas
California City city and surrounding areas
Casa Loma CDP and surrounding areas
Cherokee Strip CDP and surrounding areas
Choctaw Valley CDP and surrounding areas
Cottonwood CDP and surrounding areas
Delano city and surrounding areas
Di Giorgio CDP and surrounding areas
East Bakersfield CDP and surrounding areas
East Niles CDP and surrounding areas
Edison CDP and surrounding areas
Edmundson Acres CDP and surrounding areas
Edwards AFB CDP and surrounding areas
El Adobe CDP and surrounding areas
Fairfax CDP and surrounding areas
Frazier Park CDP and surrounding areas
Fuller Acres CDP and surrounding areas
Golden Hills CDP and surrounding areas
Goodmanville CDP and surrounding areas
Greenacres CDP and surrounding areas
Greenfield CDP and surrounding areas
Hillcrest CDP and surrounding areas
Keene CDP and surrounding areas
La Cresta CDP and surrounding areas
Lake of the Woods CDP and surrounding areas
Lakeside CDP and surrounding areas
Lamont CDP and surrounding areas
Lebec CDP and surrounding areas
Mettler CDP and surrounding areas

Note: Locality names are based on U.S. Census Bureau's nomenclature. CDP stands for "Census Defined Place."

Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Kern

Mexican Colony CDP and surrounding areas
Mojave CDP and surrounding areas
Mountain Meadows CDP and surrounding areas
Oildale CDP and surrounding areas
Old River CDP and surrounding areas
Old Stine CDP and surrounding areas
Olde Stockdale CDP and surrounding areas
Pine Mountain Club CDP and surrounding areas
Potomac Park CDP and surrounding areas
Pumpkin Center CDP and surrounding areas
Rexland Acres CDP and surrounding areas
Rivergrove CDP and surrounding areas
Rosamond CDP and surrounding areas
Rosedale CDP and surrounding areas
Shafter city and surrounding areas
Smith Corner CDP and surrounding areas
Stallion Springs CDP and surrounding areas
Stebbins CDP and surrounding areas
Tarina CDP and surrounding areas
Tehachapi city and surrounding areas
Wasco city and surrounding areas
Weedpatch CDP and surrounding areas

Kings

Armona CDP and surrounding areas
Avenal city and surrounding areas
Grangeville CDP and surrounding areas
Hanford city and surrounding areas
Hardwick CDP and surrounding areas
Home Garden CDP and surrounding areas
Kettleman City CDP and surrounding areas
Lemoore Station CDP and surrounding areas
Lemoore city and surrounding areas
Stratford CDP and surrounding areas

Lake

Clearlake Oaks CDP and surrounding areas
Clearlake Riviera CDP and surrounding areas
Clearlake city and surrounding areas
Cobb CDP and surrounding areas
Hidden Valley Lake CDP and surrounding areas
Kelseyville CDP and surrounding areas
Lakeport city and surrounding areas
Lower Lake CDP and surrounding areas
Lucerne CDP and surrounding areas
Middletown CDP and surrounding areas
Nice CDP and surrounding areas
North Lakeport CDP and surrounding areas

Lake

Soda Bay CDP and surrounding areas
Spring Valley CDP and surrounding areas
Upper Lake CDP and surrounding areas

Los Angeles

Acton CDP and surrounding areas
Agoura Hills city and surrounding areas
Agua Dulce CDP and surrounding areas
Alhambra city and surrounding areas
Alondra Park CDP and surrounding areas
Altadena CDP and surrounding areas
Arcadia city and surrounding areas
Avalon city and surrounding areas
Baldwin Park city and surrounding areas
Bell Gardens city and surrounding areas
Bell city and surrounding areas
Bellflower city and surrounding areas
Beverly Hills city and surrounding areas
Burbank city and surrounding areas
Calabasas city and surrounding areas
Carson city and surrounding areas
Castaic CDP and surrounding areas
Cerritos city and surrounding areas
Commerce city and surrounding areas
Compton city and surrounding areas
Cudahy city and surrounding areas
Culver City city and surrounding areas
Del Aire CDP and surrounding areas
Desert View Highlands CDP and surrounding areas
Downey city and surrounding areas
East Los Angeles CDP and surrounding areas
East Pasadena CDP and surrounding areas
East Rancho Dominguez CDP and surrounding areas
East San Gabriel CDP and surrounding areas
El Monte city and surrounding areas
El Segundo city and surrounding areas
Elizabeth Lake CDP and surrounding areas
Florence-Graham CDP and surrounding areas
Gardena city and surrounding areas
Glendale city and surrounding areas
Green Valley CDP and surrounding areas
Hasley Canyon CDP and surrounding areas
Hawaiian Gardens city and surrounding areas
Hawthorne city and surrounding areas
Hidden Hills city and surrounding areas
Huntington Park city and surrounding areas

Note: Locality names are based on U.S. Census Bureau's nomenclature. CDP stands for "Census Defined Place."

Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Los Angeles

Industry city and surrounding areas
Inglewood city and surrounding areas
Irwindale city and surrounding areas
La Cañada Flintridge city and surrounding areas
La Crescenta-Montrose CDP and surrounding areas
La Mirada city and surrounding areas
Ladera Heights CDP and surrounding areas
Lake Los Angeles CDP and surrounding areas
Lakewood city and surrounding areas
Lancaster city and surrounding areas
Lawndale city and surrounding areas
Lennox CDP and surrounding areas
Leona Valley CDP and surrounding areas
Littlerock CDP and surrounding areas
Lomita city and surrounding areas
Long Beach city and surrounding areas
Los Angeles city and surrounding areas
Lynwood city and surrounding areas
Manhattan Beach city and surrounding areas
Mayflower Village CDP and surrounding areas
Maywood city and surrounding areas
Monrovia city and surrounding areas
Montebello city and surrounding areas
Monterey Park city and surrounding areas
North El Monte CDP and surrounding areas
Palmdale city and surrounding areas
Paramount city and surrounding areas
Pasadena city and surrounding areas
Pico Rivera city and surrounding areas
Rancho Palos Verdes city and surrounding areas
Redondo Beach city and surrounding areas
Rolling Hills Estates city and surrounding areas
Rolling Hills city and surrounding areas
Rosemead city and surrounding areas
Rowland Heights CDP and surrounding areas
San Gabriel city and surrounding areas
San Marino city and surrounding areas
San Pasqual CDP and surrounding areas
Santa Clarita city and surrounding areas
Santa Fe Springs city and surrounding areas
South El Monte city and surrounding areas
South Gate city and surrounding areas
South Monrovia Island CDP and surrounding areas
South Pasadena city and surrounding areas
South San Gabriel CDP and surrounding areas
Stevenson Ranch CDP and surrounding areas

Los Angeles

Sun Village CDP and surrounding areas
Temple City city and surrounding areas
Topanga CDP and surrounding areas
Torrance city and surrounding areas
Val Verde CDP and surrounding areas
Vernon city and surrounding areas
View Park-Windsor Hills CDP and surrounding areas
Walnut Park CDP and surrounding areas
West Athens CDP and surrounding areas
West Carson CDP and surrounding areas
West Hollywood city and surrounding areas
West Rancho Dominguez CDP and surrounding areas
Westlake Village city and surrounding areas
Westmont CDP and surrounding areas
Willowbrook CDP and surrounding areas

Madera

Bonadelle Ranchos CDP and surrounding areas
Chowchilla city and surrounding areas
Fairmead CDP and surrounding areas
La Vina CDP and surrounding areas
Madera Acres CDP and surrounding areas
Madera Ranchos CDP and surrounding areas
Madera city and surrounding areas
Parksdale CDP and surrounding areas
Parkwood CDP and surrounding areas
Rolling Hills CDP and surrounding areas

Marin

Alto CDP and surrounding areas
Belvedere city and surrounding areas
Black Point-Green Point CDP and surrounding areas
Bollinas CDP and surrounding areas
Corte Madera town and surrounding areas
Dillon Beach CDP and surrounding areas
Fairfax town and surrounding areas
Inverness CDP and surrounding areas
Kentfield CDP and surrounding areas
Lagunitas-Forest Knolls CDP and surrounding areas
Larkspur city and surrounding areas
Lucas Valley-Marinwood CDP and surrounding areas
Marin City CDP and surrounding areas
Mill Valley city and surrounding areas

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Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Marin

Muir Beach CDP and surrounding areas
Nicasio CDP and surrounding areas
Novato city and surrounding areas
Point Reyes Station CDP and surrounding areas
Ross town and surrounding areas
San Anselmo town and surrounding areas
San Geronimo CDP and surrounding areas
San Rafael city and surrounding areas
Santa Venetia CDP and surrounding areas
Sausalito city and surrounding areas
Sleepy Hollow CDP and surrounding areas
Stinson Beach CDP and surrounding areas
Strawberry CDP and surrounding areas
Tamalpais-Homestead Valley CDP and surrounding areas
Tiburon town and surrounding areas
Tomaes CDP and surrounding areas
Woodacre CDP and surrounding areas

Mariposa

Buck Meadows CDP and surrounding areas
Coulterville CDP and surrounding areas
El Portal CDP and surrounding areas
Foresta CDP and surrounding areas
Greeley Hill CDP and surrounding areas
Lake Don Pedro CDP and surrounding areas
Wawona CDP and surrounding areas
Yosemite Valley CDP and surrounding areas

Mendocino

Albion CDP and surrounding areas
Anchor Bay CDP and surrounding areas
Boonville CDP and surrounding areas
Brooktrails CDP and surrounding areas
Calpella CDP and surrounding areas
Caspar CDP and surrounding areas
Cleone CDP and surrounding areas
Comptche CDP and surrounding areas
Fort Bragg city and surrounding areas
Hopland CDP and surrounding areas
Little River CDP and surrounding areas
Manchester CDP and surrounding areas
Mendocino CDP and surrounding areas
Philo CDP and surrounding areas
Point Arena city and surrounding areas
Potter Valley CDP and surrounding areas
Redwood Valley CDP and surrounding areas
Talmage CDP and surrounding areas

Mendocino

Ukiah city and surrounding areas
Willits city and surrounding areas

Merced

Atwater city and surrounding areas
Ballico CDP and surrounding areas
Bear Creek CDP and surrounding areas
Delhi CDP and surrounding areas
El Nido CDP and surrounding areas
Franklin CDP and surrounding areas
Gustine city and surrounding areas
Hilmar-Irwin CDP and surrounding areas
Le Grand CDP and surrounding areas
Livingston city and surrounding areas
Los Banos city and surrounding areas
McSwain CDP and surrounding areas
Merced city and surrounding areas
Planada CDP and surrounding areas
Santa Nella CDP and surrounding areas
Stevinson CDP and surrounding areas
Tuttle CDP and surrounding areas
University of California-Merced CDP and surrounding areas
Volta CDP and surrounding areas
Winton CDP and surrounding areas

Monterey

Aromas CDP and surrounding areas
Boronda CDP and surrounding areas
Bradley CDP and surrounding areas
Carmel Valley Village CDP and surrounding areas
Carmel-by-the-Sea city and surrounding areas
Castroville CDP and surrounding areas
Chualar CDP and surrounding areas
Del Monte Forest CDP and surrounding areas
Del Rey Oaks city and surrounding areas
Elkhorn CDP and surrounding areas
Fort Hunter Liggett CDP and surrounding areas
Gonzales city and surrounding areas
Greenfield city and surrounding areas
King City city and surrounding areas
Las Lomas CDP and surrounding areas
Lockwood CDP and surrounding areas
Marina city and surrounding areas
Monterey city and surrounding areas
Moss Landing CDP and surrounding areas
Pacific Grove city and surrounding areas

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Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Monterey

Pajaro CDP and surrounding areas
Pine Canyon CDP and surrounding areas
Prunedale CDP and surrounding areas
Salinas city and surrounding areas
San Ardo CDP and surrounding areas
San Lucas CDP and surrounding areas
Sand City city and surrounding areas
Seaside city and surrounding areas
Soledad city and surrounding areas
Spreckels CDP and surrounding areas

Napa

American Canyon city and surrounding areas
Angwin CDP and surrounding areas
Calistoga city and surrounding areas
Deer Park CDP and surrounding areas
Moskowite Corner CDP and surrounding areas
Napa city and surrounding areas
Oakville CDP and surrounding areas
Rutherford CDP and surrounding areas
Silverado Resort CDP and surrounding areas
St. Helena city and surrounding areas
Yountville city and surrounding areas

Nevada

Alta Sierra CDP and surrounding areas
Floriston CDP and surrounding areas
Grass Valley city and surrounding areas
Kingvale CDP and surrounding areas
Lake Wildwood CDP and surrounding areas
Lake of the Pines CDP and surrounding areas
Nevada City city and surrounding areas
North San Juan CDP and surrounding areas
Penn Valley CDP and surrounding areas
Rough and Ready CDP and surrounding areas
Soda Springs CDP and surrounding areas
Truckee town and surrounding areas

Orange

Aliso Viejo city and surrounding areas
Anaheim city and surrounding areas
Brea city and surrounding areas
Buena Park city and surrounding areas
Costa Mesa city and surrounding areas
Coto de Caza CDP and surrounding areas
Cypress city and surrounding areas
Dana Point city and surrounding areas
Fountain Valley city and surrounding areas

Orange

Fullerton city and surrounding areas
Garden Grove city and surrounding areas
Huntington Beach city and surrounding areas
Irvine city and surrounding areas
La Habra city and surrounding areas
La Mirada city and surrounding areas
La Palma city and surrounding areas
Ladera Ranch CDP and surrounding areas
Laguna Beach city and surrounding areas
Laguna Hills city and surrounding areas
Laguna Niguel city and surrounding areas
Laguna Woods city and surrounding areas
Lake Forest city and surrounding areas
Las Flores CDP and surrounding areas
Los Alamitos city and surrounding areas
Mission Viejo city and surrounding areas
Modjeska CDP and surrounding areas
Newport Beach city and surrounding areas
North Tustin CDP and surrounding areas
Orange city and surrounding areas
Placentia city and surrounding areas
Rancho Mission Viejo CDP and surrounding areas
Rancho Santa Margarita city and surrounding areas
San Clemente city and surrounding areas
San Juan Capistrano city and surrounding areas
Santa Ana city and surrounding areas
Silverado CDP and surrounding areas
Stanton city and surrounding areas
Trabuco Canyon CDP and surrounding areas
Tustin city and surrounding areas
Villa Park city and surrounding areas
Westminster city and surrounding areas
Williams Canyon CDP and surrounding areas
Yorba Linda city and surrounding areas

Placer

Alta CDP and surrounding areas
Auburn city and surrounding areas
Carnelian Bay CDP and surrounding areas
Cedar Flat CDP and surrounding areas
Dollar Point CDP and surrounding areas
Dutch Flat CDP and surrounding areas
Foresthill CDP and surrounding areas
Granite Bay CDP and surrounding areas
Kings Beach CDP and surrounding areas
Kingvale CDP and surrounding areas

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Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Placer

Lincoln city and surrounding areas
Loomis town and surrounding areas
Meadow Vista CDP and surrounding areas
Newcastle CDP and surrounding areas
North Auburn CDP and surrounding areas
Penryn CDP and surrounding areas
Rocklin city and surrounding areas
Roseville city and surrounding areas
Sheridan CDP and surrounding areas
Sunnyside-Tahoe City CDP and surrounding areas
Tahoe Vista CDP and surrounding areas
Tahoma CDP and surrounding areas

Plumas

Beckwourth CDP and surrounding areas
Belden CDP and surrounding areas
Blairsden CDP and surrounding areas
C-Road CDP and surrounding areas
Caribou CDP and surrounding areas
Chilcoot-Vinton CDP and surrounding areas
Clio CDP and surrounding areas
Cromberg CDP and surrounding areas
Delleker CDP and surrounding areas
East Quincy CDP and surrounding areas
Gold Mountain CDP and surrounding areas
Graeagle CDP and surrounding areas
Greenhorn CDP and surrounding areas
Indian Falls CDP and surrounding areas
Iron Horse CDP and surrounding areas
Johnsville CDP and surrounding areas
La Porte CDP and surrounding areas
Lake Davis CDP and surrounding areas
Little Grass Valley CDP and surrounding areas
Mabie CDP and surrounding areas
Meadow Valley CDP and surrounding areas
Mohawk Vista CDP and surrounding areas
Plumas Eureka CDP and surrounding areas
Portola city and surrounding areas
Quincy CDP and surrounding areas
Twain CDP and surrounding areas
Valley Ranch CDP and surrounding areas
Whitehawk CDP and surrounding areas

Riverside

Aguanga CDP and surrounding areas
Colton city and surrounding areas
Corona city and surrounding areas

Riverside

Coronita CDP and surrounding areas
Eastvale city and surrounding areas
El Cerrito CDP and surrounding areas
El Sobrante CDP and surrounding areas
Grand Terrace city and surrounding areas
Highgrove CDP and surrounding areas
Home Gardens CDP and surrounding areas
Jurupa Valley city and surrounding areas
Lake Mathews CDP and surrounding areas
Mead Valley CDP and surrounding areas
Moreno Valley city and surrounding areas
Norco city and surrounding areas
Riverside city and surrounding areas
Temecula city and surrounding areas
Temescal Valley CDP and surrounding areas
Woodcrest CDP and surrounding areas

Sacramento

Antelope CDP and surrounding areas
Arden-Arcade CDP and surrounding areas
Carmichael CDP and surrounding areas
Citrus Heights city and surrounding areas
Clay CDP and surrounding areas
Elk Grove city and surrounding areas
Elverta CDP and surrounding areas
Fair Oaks CDP and surrounding areas
Florin CDP and surrounding areas
Folsom city and surrounding areas
Foothill Farms CDP and surrounding areas
Freeport CDP and surrounding areas
Fruitridge Pocket CDP and surrounding areas
Galt city and surrounding areas
Gold River CDP and surrounding areas
Herald CDP and surrounding areas
La Riviera CDP and surrounding areas
Lemon Hill CDP and surrounding areas
Mather CDP and surrounding areas
McClellan Park CDP and surrounding areas
North Highlands CDP and surrounding areas
Orangevale CDP and surrounding areas
Parkway CDP and surrounding areas
Rancho Cordova city and surrounding areas
Rancho Murieta CDP and surrounding areas
Rio Linda CDP and surrounding areas
Rosemont CDP and surrounding areas
Sacramento city and surrounding areas
Vineyard CDP and surrounding areas
Wilton CDP and surrounding areas

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Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

San Benito

Aromas CDP and surrounding areas
Hollister city and surrounding areas
Ridgemark CDP and surrounding areas
San Juan Bautista city and surrounding areas
Tres Pinos CDP and surrounding areas

San Bernardino

Baker CDP and surrounding areas
Bloomington CDP and surrounding areas
Chino Hills city and surrounding areas
Chino city and surrounding areas
Colton city and surrounding areas
Fontana city and surrounding areas
Grand Terrace city and surrounding areas
Highland city and surrounding areas
Loma Linda city and surrounding areas
Ontario city and surrounding areas
Piñon Hills CDP and surrounding areas
Rancho Cucamonga city and surrounding areas
Redlands city and surrounding areas
Rialto city and surrounding areas
San Bernardino city and surrounding areas

San Diego

Alpine CDP and surrounding areas
Bonita CDP and surrounding areas
Bonsall CDP and surrounding areas
Borrego Springs CDP and surrounding areas
Bostonia CDP and surrounding areas
Boulevard CDP and surrounding areas
Camp Pendleton Mainside CDP and surrounding areas
Camp Pendleton South CDP and surrounding areas
Campo CDP and surrounding areas
Carlsbad city and surrounding areas
Casa de Oro-Mount Helix CDP and surrounding areas
Chula Vista city and surrounding areas
Coronado city and surrounding areas
Crest CDP and surrounding areas
Del Dios CDP and surrounding areas
Del Mar city and surrounding areas
Descanso CDP and surrounding areas
El Cajon city and surrounding areas
Elfin Forest CDP and surrounding areas
Encinitas city and surrounding areas
Escondido city and surrounding areas

San Diego

Eucalyptus Hills CDP and surrounding areas
Fairbanks Ranch CDP and surrounding areas
Fallbrook CDP and surrounding areas
Granite Hills CDP and surrounding areas
Harbison Canyon CDP and surrounding areas
Harmony Grove CDP and surrounding areas
Hidden Meadows CDP and surrounding areas
Imperial Beach city and surrounding areas
Jacumba CDP and surrounding areas
Jamul CDP and surrounding areas
Julian CDP and surrounding areas
La Mesa city and surrounding areas
La Presa CDP and surrounding areas
Lake San Marcos CDP and surrounding areas
Lakeside CDP and surrounding areas
Lemon Grove city and surrounding areas
Mount Laguna CDP and surrounding areas
National City city and surrounding areas
Oceanside city and surrounding areas
Pala CDP and surrounding areas
Pine Valley CDP and surrounding areas
Potrero CDP and surrounding areas
Poway city and surrounding areas
Rainbow CDP and surrounding areas
Ramona CDP and surrounding areas
Rancho San Diego CDP and surrounding areas
Rancho Santa Fe CDP and surrounding areas
San Diego Country Estates CDP and surrounding areas
San Diego city and surrounding areas
San Marcos city and surrounding areas
Santee city and surrounding areas
Solana Beach city and surrounding areas
Spring Valley CDP and surrounding areas
Valley Center CDP and surrounding areas
Vista city and surrounding areas
Winter Gardens CDP and surrounding areas

San Francisco

San Francisco city and surrounding areas

San Joaquin

Acampo CDP and surrounding areas
August CDP and surrounding areas
Collierville CDP and surrounding areas
Country Club CDP and surrounding areas
Dogtown CDP and surrounding areas
Escalon city and surrounding areas

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Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

San Joaquin

French Camp CDP and surrounding areas
Garden Acres CDP and surrounding areas
Kennedy CDP and surrounding areas
Lathrop city and surrounding areas
Lincoln Village CDP and surrounding areas
Linden CDP and surrounding areas
Lockeford CDP and surrounding areas
Lodi city and surrounding areas
Manteca city and surrounding areas
Morada CDP and surrounding areas
Mountain House CDP and surrounding areas
Peters CDP and surrounding areas
Ripon city and surrounding areas
Stockton city and surrounding areas
Taft Mosswood CDP and surrounding areas
Terminus CDP and surrounding areas
Thornton CDP and surrounding areas
Tracy city and surrounding areas
Victor CDP and surrounding areas
Waterloo CDP and surrounding areas
Woodbridge CDP and surrounding areas

San Luis Obispo

Arroyo Grande city and surrounding areas
Atascadero city and surrounding areas
Avila Beach CDP and surrounding areas
Blacklake CDP and surrounding areas
California Polytechnic State University CDP and surrounding areas
Callender CDP and surrounding areas
Cambria CDP and surrounding areas
Cayucos CDP and surrounding areas
Creston CDP and surrounding areas
Edna CDP and surrounding areas
El Paso de Robles (Paso Robles) city and surrounding areas
Garden Farms CDP and surrounding areas
Grover Beach city and surrounding areas
Lake Nacimiento CDP and surrounding areas
Los Berros CDP and surrounding areas
Los Osos CDP and surrounding areas
Los Ranchos CDP and surrounding areas
Morro Bay city and surrounding areas
Nipomo CDP and surrounding areas
Oak Shores CDP and surrounding areas
Oceano CDP and surrounding areas
Pismo Beach city and surrounding areas
San Luis Obispo city and surrounding areas

San Luis Obispo

San Simeon CDP and surrounding areas
Santa Margarita CDP and surrounding areas
Shandon CDP and surrounding areas
Templeton CDP and surrounding areas
Whitley Gardens CDP and surrounding areas
Woodlands CDP and surrounding areas

San Mateo

Atherton town and surrounding areas
Baywood Park CDP and surrounding areas
Belmont city and surrounding areas
Brisbane city and surrounding areas
Broadmoor CDP and surrounding areas
Burlingame city and surrounding areas
Colma town and surrounding areas
Daly City city and surrounding areas
East Palo Alto city and surrounding areas
El Granada CDP and surrounding areas
Emerald Lake Hills CDP and surrounding areas
Foster City city and surrounding areas
Half Moon Bay city and surrounding areas
Highlands CDP and surrounding areas
Hillsborough town and surrounding areas
La Honda CDP and surrounding areas
Ladera CDP and surrounding areas
Loma Mar CDP and surrounding areas
Menlo Park city and surrounding areas
Millbrae city and surrounding areas
Montara CDP and surrounding areas
Moss Beach CDP and surrounding areas
North Fair Oaks CDP and surrounding areas
Pacifica city and surrounding areas
Pescadero CDP and surrounding areas
Portola Valley town and surrounding areas
Redwood City city and surrounding areas
San Bruno city and surrounding areas
San Carlos city and surrounding areas
San Mateo city and surrounding areas
South San Francisco city and surrounding areas
West Menlo Park CDP and surrounding areas
Woodside town and surrounding areas

Santa Clara

Alum Rock CDP and surrounding areas
Burbank CDP and surrounding areas
Cambrian Park CDP and surrounding areas
Campbell city and surrounding areas
Cupertino city and surrounding areas

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Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Santa Clara

East Foothills CDP and surrounding areas
Fruitdale CDP and surrounding areas
Los Altos Hills town and surrounding areas
Los Altos city and surrounding areas
Los Gatos town and surrounding areas
Loyola CDP and surrounding areas
Milpitas city and surrounding areas
Morgan Hill city and surrounding areas
Mountain View city and surrounding areas
Palo Alto city and surrounding areas
San Jose city and surrounding areas
San Martin CDP and surrounding areas
Santa Clara city and surrounding areas
Saratoga city and surrounding areas
Stanford CDP and surrounding areas
Sunnyvale city and surrounding areas

Santa Cruz

Amesti CDP and surrounding areas
Aptos CDP and surrounding areas
Aptos Hills-Larkin Valley CDP and surrounding areas
Ben Lomond CDP and surrounding areas
Bonny Doon CDP and surrounding areas
Boulder Creek CDP and surrounding areas
Brookdale CDP and surrounding areas
Capitola city and surrounding areas
Corralitos CDP and surrounding areas
Davenport CDP and surrounding areas
Day Valley CDP and surrounding areas
Felton CDP and surrounding areas
Freedom CDP and surrounding areas
Interlaken CDP and surrounding areas
La Selva Beach CDP and surrounding areas
Live Oak CDP and surrounding areas
Lompico CDP and surrounding areas
Mount Hermon CDP and surrounding areas
Pajaro Dunes CDP and surrounding areas
Paradise Park CDP and surrounding areas
Pasatiempo CDP and surrounding areas
Pleasure Point CDP and surrounding areas
Rio del Mar CDP and surrounding areas
Santa Cruz city and surrounding areas
Scotts Valley city and surrounding areas
Seacliff CDP and surrounding areas
Soquel CDP and surrounding areas
Twin Lakes CDP and surrounding areas
Watsonville city and surrounding areas

Santa Cruz

Zayante CDP and surrounding areas

Shasta

Anderson city and surrounding areas
Bella Vista CDP and surrounding areas
Castella CDP and surrounding areas
Centerville CDP and surrounding areas
Cottonwood CDP and surrounding areas
French Gulch CDP and surrounding areas
Happy Valley CDP and surrounding areas
Jones Valley CDP and surrounding areas
Keswick CDP and surrounding areas
Lakehead CDP and surrounding areas
Mountain Gate CDP and surrounding areas
Palo Cedro CDP and surrounding areas
Redding city and surrounding areas
Shasta CDP and surrounding areas
Shasta Lake city and surrounding areas

Sierra

Calpine CDP and surrounding areas
Loyalton city and surrounding areas
Pike CDP and surrounding areas
Sattley CDP and surrounding areas
Sierra Brooks CDP and surrounding areas
Sierraville CDP and surrounding areas

Siskiyou

Carrick CDP and surrounding areas
Dunsmuir city and surrounding areas
Edgewood CDP and surrounding areas
Gazelle CDP and surrounding areas
Grenada CDP and surrounding areas
Hornbrook CDP and surrounding areas
Lake Shastina CDP and surrounding areas
Montague city and surrounding areas
Mount Shasta city and surrounding areas
Weed city and surrounding areas
Yreka city and surrounding areas

Solano

Allendale CDP and surrounding areas
Benicia city and surrounding areas
Dixon city and surrounding areas
Elmira CDP and surrounding areas
Fairfield city and surrounding areas
Green Valley CDP and surrounding areas
Hartley CDP and surrounding areas

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Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Solano

Suisun City city and surrounding areas
Vacaville city and surrounding areas
Vallejo city and surrounding areas

Sonoma

Bloomfield CDP and surrounding areas
Bodega Bay CDP and surrounding areas
Bodega CDP and surrounding areas
Boyes Hot Springs CDP and surrounding areas
Carmet CDP and surrounding areas
Cloverdale city and surrounding areas
Cotati city and surrounding areas
El Verano CDP and surrounding areas
Eldridge CDP and surrounding areas
Fetters Hot Springs-Agua Caliente CDP and surrounding areas
Forestville CDP and surrounding areas
Fulton CDP and surrounding areas
Geyserville CDP and surrounding areas
Glen Ellen CDP and surrounding areas
Graton CDP and surrounding areas
Guerneville CDP and surrounding areas
Healdsburg city and surrounding areas
Jenner CDP and surrounding areas
Larkfield-Wikiup CDP and surrounding areas
Monte Rio CDP and surrounding areas
Occidental CDP and surrounding areas
Penngrove CDP and surrounding areas
Petaluma Center CDP and surrounding areas
Petaluma city and surrounding areas
Rohnert Park city and surrounding areas
Salmon Creek CDP and surrounding areas
Santa Rosa city and surrounding areas
Sea Ranch CDP and surrounding areas
Sebastopol city and surrounding areas
Sereno del Mar CDP and surrounding areas
Sonoma State University CDP and surrounding areas
Sonoma city and surrounding areas
Temelec CDP and surrounding areas
Valley Ford CDP and surrounding areas
Windsor town and surrounding areas

Stanislaus

Airport CDP and surrounding areas
Bret Harte CDP and surrounding areas
Bystrom CDP and surrounding areas
Ceres city and surrounding areas

Stanislaus

Cowan CDP and surrounding areas
Crows Landing CDP and surrounding areas
Del Rio CDP and surrounding areas
Denair CDP and surrounding areas
East Oakdale CDP and surrounding areas
Empire CDP and surrounding areas
Hickman CDP and surrounding areas
Hughson city and surrounding areas
Keyes CDP and surrounding areas
Knights Ferry CDP and surrounding areas
La Grange CDP and surrounding areas
Modesto city and surrounding areas
Monterey Park Tract CDP and surrounding areas
Newman city and surrounding areas
Oakdale city and surrounding areas
Orange Blossom CDP and surrounding areas
Parklawn CDP and surrounding areas
Riverbank city and surrounding areas
Riverdale Park CDP and surrounding areas
Rouse CDP and surrounding areas
Salida CDP and surrounding areas
Turlock city and surrounding areas
Valley Home CDP and surrounding areas
Waterford city and surrounding areas
West Modesto CDP and surrounding areas

Sutter

East Nicolaus CDP and surrounding areas
Live Oak city and surrounding areas
Meridian CDP and surrounding areas
Nicolaus CDP and surrounding areas
Rio Oso CDP and surrounding areas
Sutter CDP and surrounding areas
Trowbridge CDP and surrounding areas
Yuba City city and surrounding areas

Tehama

Bend CDP and surrounding areas
Corning city and surrounding areas
Flournoy CDP and surrounding areas
Gerber CDP and surrounding areas
Lake California CDP and surrounding areas
Las Flores CDP and surrounding areas
Los Molinos CDP and surrounding areas
Paskenta CDP and surrounding areas
Proberta CDP and surrounding areas
Rancho Tehama Reserve CDP and surrounding areas

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Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Tehama

Red Bluff city and surrounding areas
Richfield CDP and surrounding areas
Tehama city and surrounding areas
Vina CDP and surrounding areas

Trinity

Lewiston CDP and surrounding areas

Tulare

Allensworth CDP and surrounding areas
Camp Nelson CDP and surrounding areas
Cutler CDP and surrounding areas
Delft Colony CDP and surrounding areas
Dinuba city and surrounding areas
Earlimart CDP and surrounding areas
East Orosi CDP and surrounding areas
East Porterville CDP and surrounding areas
East Tulare Villa CDP and surrounding areas
El Monte Mobile Village CDP and surrounding areas
Farmersville city and surrounding areas
Goshen CDP and surrounding areas
Hypericum CDP and surrounding areas
Ivanhoe CDP and surrounding areas
Jovista CDP and surrounding areas
Linnell Camp CDP and surrounding areas
London CDP and surrounding areas
Matheny CDP and surrounding areas
Monson CDP and surrounding areas
Orosi CDP and surrounding areas
Patterson Tract CDP and surrounding areas
Pierpoint CDP and surrounding areas
Pixley CDP and surrounding areas
Poplar-Cotton Center CDP and surrounding areas
Porterville city and surrounding areas
Richgrove CDP and surrounding areas
Rodriguez Camp CDP and surrounding areas
Sequoia Crest CDP and surrounding areas
Seville CDP and surrounding areas
Springville CDP and surrounding areas
Strathmore CDP and surrounding areas
Sultana CDP and surrounding areas
Terra Bella CDP and surrounding areas
Teviston CDP and surrounding areas
Three Rivers CDP and surrounding areas
Tipton CDP and surrounding areas
Traver CDP and surrounding areas

Tulare

Tulare city and surrounding areas
Visalia city and surrounding areas
Waukena CDP and surrounding areas
West Goshen CDP and surrounding areas
Woodlake city and surrounding areas
Woodville CDP and surrounding areas
Woodville Farm Labor Camp CDP and surrounding areas
Yettam CDP and surrounding areas

Tuolumne

Cedar Ridge CDP and surrounding areas
Chinese Camp CDP and surrounding areas
Cold Springs CDP and surrounding areas
Columbia CDP and surrounding areas
East Sonora CDP and surrounding areas
Groveland CDP and surrounding areas
Jamestown CDP and surrounding areas
Long Barn CDP and surrounding areas
Mi-Wuk Village CDP and surrounding areas
Mono Vista CDP and surrounding areas
Phoenix Lake CDP and surrounding areas
Pine Mountain Lake CDP and surrounding areas
Sierra Village CDP and surrounding areas
Sonora city and surrounding areas
Soulsbyville CDP and surrounding areas
Strawberry CDP and surrounding areas
Tuttletown CDP and surrounding areas
Twain Harte CDP and surrounding areas

Ventura

Bell Canyon CDP and surrounding areas
El Rio CDP and surrounding areas
Fillmore city and surrounding areas
Meiners Oaks CDP and surrounding areas
Mira Monte CDP and surrounding areas
Moorpark city and surrounding areas
Oak Park CDP and surrounding areas
Oak View CDP and surrounding areas
Ojai city and surrounding areas
Oxnard city and surrounding areas
Piru CDP and surrounding areas
San Buenaventura (Ventura) city and surrounding areas
Santa Rosa Valley CDP and surrounding areas
Santa Susana CDP and surrounding areas
Saticoy CDP and surrounding areas
Simi Valley city and surrounding areas

Note: Locality names are based on U.S. Census Bureau's nomenclature. CDP stands for "Census Defined Place."

Localities Where AT&T California Is Seeking Relief from Its COLR Obligation

Ventura

Thousand Oaks city and surrounding areas

Yolo

Davis city and surrounding areas
Dunnigan CDP and surrounding areas
El Macero CDP and surrounding areas
Esparto CDP and surrounding areas
Madison CDP and surrounding areas
Monument Hills CDP and surrounding areas
University of California-Davis CDP and surrounding areas
West Sacramento city and surrounding areas
Winters city and surrounding areas
Woodland city and surrounding areas
Yolo CDP and surrounding areas

Yuba

Beale AFB CDP and surrounding areas
Camptonville CDP and surrounding areas
Challenge-Brownsville CDP and surrounding areas
Dobbins CDP and surrounding areas
Linda CDP and surrounding areas
Loma Rica CDP and surrounding areas
Marysville city and surrounding areas
Olivehurst CDP and surrounding areas
Plumas Lake CDP and surrounding areas
Smartsville CDP and surrounding areas
Wheatland city and surrounding areas

Note: Locality names are based on U.S. Census Bureau's nomenclature. CDP stands for "Census Defined Place."

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Bell Telephone Company
d/b/a AT&T California (U 1001 C) for Targeted
Relief from Its Carrier of Last Resort Obligation
and Certain Associated Tariff Obligations.

A.23-03-003
(Filed March 3, 2023)

**SUMMARY OF PARTY POSITIONS FOR PACIFIC BELL TELEPHONE
COMPANY D/B/A AT&T CALIFORNIA (U 1001 C) AND INTERVENORS**

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January 16, 2024

In compliance with Section 4 and Ruling 2 of the Administrative Law Judge's Ruling Noticing Public Participation Hearings and Additional Instructions for Applicant dated December 4, 2023 ("Ruling"), Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) ("AT&T California") hereby files and serves the attached summary of the party positions in this proceeding. As required by the Ruling, AT&T California organized meet and confer meetings to discuss a one-page (double-sided) summary of the parties' respective positions on the issues that are in the scope of this proceeding and provided notice to all parties of the meetings. Specifically, on January 9, 2024, AT&T California held an initial meet and confer, attended by California Public Advocates Office ("Cal Advocates"), Center for Accessible Technology ("CforAT"), and Tahoe Energy Ratepayers Group ("Tahoe ERG"). Subsequently, AT&T California held a second meet and confer on January 11, 2024, attended by Cal Advocates, The Utility Reform Network, CforAT, and Tahoe ERG (collectively with Rural County Representatives of California, "Intervenors").

As directed in the Ruling, the attachment hereto includes the summaries from AT&T California and Intervenors.

[Signature page follows]

Dated: January 16, 2024

Respectfully submitted,

/s/ Nelsonya Causby

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SUMMARY OF PARTY POSITIONS

A.23-03-003

AT&T California's COLR Application Summary

Beginning in the 1990s, there has been a transition from AT&T California's local telephone monopoly to today's voice service offerings provided by a variety of providers, wired and wireless. In 1996, to ensure that everyone could receive phone service during the transition, the Commission assigned AT&T California to be the carrier of last resort ("COLR") and required it to extend its copper network to any location in its service territory. Now, twenty-seven years later, after about 90 percent of AT&T California's former customers have left its plain old telephone service ("POTS") for voice services over mobile wireless or broadband connections, AT&T California has filed an application with the California Public Utilities Commission to end its COLR obligation and the associated state regulatory requirements in areas that are served by another voice provider.

The outdated COLR obligation effectively forces AT&T California to maintain its old copper-wire network to provide POTS throughout its service territory—in addition to the modern fiber and wireless broadband networks AT&T is working to extend across California.

The enormous benefits of transitioning from copper to broadband are beyond dispute. High-speed broadband enables online learning, remote work, economic advancement, civic engagement, Next Generation 911 capabilities, and access to government and other services. Fiber networks also are more resilient and use less energy than copper networks, benefiting public safety and the environment. In short, the faster this transition occurs, the better it will be for California.

Almost all (99.95 percent) consumers in AT&T California's service territory live in areas with at least one comparably or lower-priced broadband (for example, cable company) or mobile wireless voice alternatives to POTS (and 99.9 percent live in areas with at least two alternatives available). These customers with other options do not need AT&T California to be the COLR—especially since mobile wireless and broadband voice support 911 dialing, access for people with disabilities, and other critical functions as well as or better than POTS.

AT&T California will continue providing POTS services to customers for at least six months after approval of the Application. AT&T California will provide notice before any changes to customers' POTS services. For the few customers who currently lack an alternative, AT&T California will continue offering voice service on the same terms after approval of its application until an alternative arrives. Approval of the application thus would harm no one while bringing major benefits to California communities.

**A.23-03-003: JOINT CONSUMER ADVOCATES'*
PUBLIC PARTICIPATION HEARING HANDOUT**

WHAT IS THIS PROCEEDING ABOUT?

- At least one telephone company in your area is legally required to provide access to phone 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 reliable phone service. AT&T is the designated COLR in your area.
- AT&T is asking the CPUC to allow it to decide whether you can get AT&T telephone service, even if there is no other telephone provider in your area who is obligated to provide service.
- AT&T is asking the CPUC to change the rules and remove the safety net that guarantees access to affordable, quality phone service.

HOW COULD THIS AFFECT ME AND MY COMMUNITY?

If the CPUC grants AT&T's request:

- No telephone provider would be obligated to provide you service in AT&T's service area.
- AT&T could decide to not provide service to you as soon as six months after the application is granted.
- You could be required pay more for telephone service, receive lower quality service, buy phone service as part of an expensive "bundle," or depend on cell service (which is not reliable or available in some areas).
- If you live in a Mountain Community you may not be able to maintain a landline as emergency backup for when there are outages due to cell phone network being damaged or destroyed by winter storms, wildfires, or other severe weather events.
- If you are a LifeLine customer or Deaf and Disabled Telecommunications (DDTP) customer, you may not be able to obtain those services. As a COLR, AT&T is legally required to provide low-cost telephone service to low-income households through the LifeLine program.
- If you have special medical equipment or other technology (such as a fire alarm or security system), it may no longer function.

WHAT CAN I DO ABOUT IT?

Join a Public Participation Hearing and share with CPUC leadership how you and your community rely on and benefit from your telephone service, especially if you subscribe to LifeLine or DDTP services.

* The Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), the Center for Accessible Technology (CforAT), the Rural County Representatives of California (RCRC), and the Tahoe Energy Ratepayers Group (Tahoe ERG)

Despite improvements since Tubbs Fire emergency notifications remain imperfect

Written by Marc Albert

Published: 13 July 2021



Gary Liess surveys the remnants of his home since 1990.
photo credit: (Credit: Marc Albert/KRCB)

One of the most glaring lessons from the Tubbs Fire was the failure to warn those in its path. Concerned that blanket alerts would cause massive traffic jams, officials hesitated. The results were tragic. Much work has been done in the close to four years since, but issues remain.

Living three and a half miles up a dead end road between Sugar Loaf Ridge and St Helena Rd, Gary Liess figured he might be on his own in a major wildfire. Following 2017's Tubbs Fire, he became more vigilant; removing brush, creating defensible space.

One evening last year, as the Glass Fire burned out of control over the ridge to the east, a neighbor, who'd been assessing the distant flames from his motorcycle, drove up with an ominous

warning.

"He said you've got maybe four hours before it gets here," Liess said.

An hour later, he saw spot fires exploding downhill to the west, far ahead of the main fire. He raced home, rounded up their cats and some electronics. His wife Carolyn insisted they leave immediately.

"She had seen the documentary on that, I think it was the Paradise, how people y'know dicked around for an extra five, ten, fifteen minutes and didn't make it out," he said.

Recalling it months later, he remembers no warnings from the tv, radio, calls or texts, though at some point, his phone was in another room. He credits his neighbor for being able to escape less than 90 minutes before his home of three decades was obliterated.

Three years after the emergency warning system failed so dramatically during the Tubbs Fire, Liess's experience shows issues remain.

It's up to Sam Wallis, with the county's Department of Emergency Management to fix those issues. Since the Tubbs fire, the county doesn't count on a single person to issue alerts. More people are trained, and they aren't dependent only on the sheriff's dispatch center. A system of wildfire cameras can alert officials faster. Still, other problems remain, and fixing them is no easy task.

"Technology is a two edged sword," Wallis said. "There are many things that we have right now that are so much superior to what we had even five or ten years ago, we just have some amazing capabilities, but from an emergency management point of view, things have in many ways been getting worse."

Old Civil Defense sirens aren't widely missed, as they couldn't convey much other than something was happening. Landline phones, which operated on their own, low voltage electricity have been mostly phased out.

"We now have this really remarkable cell phone technology, we have voice over internet, all these just wonderful technological things that make our communications so much easier, but they're fragile. Remarkably fragile. One of the things that came out of the Nuns/Tubbs Fire is that we had over 70 cell phone towers knocked out of operation at the very moment when we most needed to be able to communicate with people," Wallis said.

Lengthy power shutoffs during high fire danger could leave many cell phones, and the towers connecting them discharged. But even when everything is working, there are gaps.

With permission from the FCC and FEMA, a test of one of the alert systems---called WEA...was held last winter in Oakmont.

"We found that only about 60 percent of the participants actually received the WEA. And this was when they knew it was coming and we set everything up, Wallis said.

WEA allows short texts to go out to every phone in a given area. It's different from SoCo Alert, which can send longer, more precise information, but only to those who have signed up. It's also slower. But Wallis says even WEA, which unlike SoCo alert local officials don't have full control over, is imperfect.

"In theory, everyone within range of that cell phone tower will receive that message. In practice however, what we found is that for a variety of reasons, some cell phones will not receive that message," Wallis said.

Dead zones, discharged batteries, and people disregarding messages from an unfamiliar source. That's all doubly true with SoCo Alert which sends alerts as ordinary texts.

"Something as simple as somebody put their do-not-disturb on their cell phone, or they have an older cell phone that doesn't have a software update, the system won't work or it could be that they happen to be in a cell shadow when it happens, Wallis said.

That's not to mention tourists or those reluctant to opt-in.

Despite active publicity campaigns, Wallis said fewer than 30 percent of county residents have signed up. But he says, about three times that are on the list anyway, as officials added in numbers gathered in utility databases and other sources. When alerts do go out, they don't always go through. Do-not-disturb settings are one reason, but incessant spam, spoof and telemarketing calls and texts are an even bigger impediment.

That's part of the reason high-low sirens have been added to many law enforcement vehicles. It's also why Santa Rosa is giving out weather radios...redundancy. But they also won't work if the power is off and batteries dead.

"If there was a magic button, that I could press and make 100% of the people get the message, definitely, I will hit that button, but that button, as of yet, does not exist," Wallis said.

Nevertheless, Wallis said the county is more prepared than ever. "I'm feeling much more confident going into this fire season than I did previous fire seasons. We have tools, we have a process, we have information sources that we didn't have in previous fire seasons. The alert and warning will go out. I may not get to 100 percent, but I'm sure going to get as close as I can to it."

Months after losing his home, Gary Liess is philosophical about all the loss.

"I'm not looking at it, oh, I lost my house, I'm looking at it I am grateful to have lived a great portion of my life in this tremendous environment. This is awesome. For me. So, yeah, OK, it's over, I get it. On to the next thing, y'know, so, I get to have another adventure," Liess said.

00:00

00:00

He and his wife are thinking of relocating to Hawaii.



NEWS

Camp Fire Aftermath: 'Technology, the Thing I Trust Most, Failed'

Technology intended to warn Butte County residents about the rampaging Camp Fire failed in several ways, an analysis shows, revealing the fragility of electronic notification systems.

December 16, 2018 • Tribune News Service

Residents of Paradise bitterly complained in the wake of the Camp Fire that Butte County's early warning system failed them, and now a detailed Bay Area News Group analysis shows just how thorough that failure was: Thousands of critical cellphone messages were missed, delayed or lost — a disturbing reminder of the fragility of electronic notifications systems.

"The system failed. Technology, the thing I trust most, failed," said Lisa Parr, an accountant who had signed up to get the county's emergency alerts but never received one. "The system that was supposed to help save us — it didn't."

This news organization's review found problems at every level — many residents didn't sign up for the system, officials didn't trigger warnings for every neighborhood, and overloaded or damaged cellular networks often failed to deliver warnings to the intended recipients.

A Butte County spokeswoman said Sheriff Kory Honea will conduct an analysis and issue a report when time allows.

"I wish we had opportunity to get more alerts out, more warning out," Honea said during a community meeting on the third day of the fire. "We try to use as many systems as we can. ... But in the heat of this, it was moving so fast, it was difficult to get that information out."

To better understand how the failures occurred, this news organization requested evacuation alert records from the Paradise and Chico police departments and from Butte County, as well as cell tower information from the California Public Utilities Commission.

A review of alerts issued by the county and Paradise police in the hours after the fire started on Nov. 8 shows that, inexplicably, no evacuation orders were issued by the county to one 6-square-mile swath of the city. Another 4-mile stretch of town received merely a warning; the actual order to flee came more than seven hours later, long after homes were reduced to ashes.

Prior to the Camp Fire, only an estimated one-quarter of the region's residents had signed up to get emergency messages — but even when they signed up, many calls didn't reach them.

Success varied from geographical zone to zone, generally deteriorating as the fire spread and the infrastructure was damaged or overwhelmed. Even in the best-performing zones, 25 percent of alerts did not make a connection to the resident's phone. In the worst zone, the call failure rate was 94 percent.

Seventeen cell towers burned that first day, according to records obtained from the CPUC. During the first two weeks of the fire, a total of 66 cellphone towers were damaged or out of service, causing phones to go silent or calls to be dropped as surviving towers became overloaded by traffic.

"We really need to get better at this," said disaster expert Kelly McKinney, author of the book *Moment of Truth: The Nature of Catastrophes and How to Prepare for Them*. McKinney urges the creation of a state system to provide a notification template and backup help for local responders.

"The public needs to understand what to expect — what will happen, when it will happen and who is accountable for making it happen," said McKinney, former deputy commissioner at New York City's Office of Emergency Management. "If you don't have those three things, it is wishful thinking. And wishful thinking always fails you in a disaster."

Paradise and its surrounding communities — where 86 people perished in the fire — is not the only place where planning has not been up to the task. In other California disasters, alerts and evacuations have fallen short, including the 2017 flooding of downtown San Jose and Tubbs Fire of Sonoma County, which killed 22. In last January's mudslides in Montecito, a message was issued while hillsides already were collapsing, killing more than 20 people.

In the San Francisco Bay Area, the public warning systems are a patchwork of technologies, personnel, media, vendors and policies, and there are both duplications and gaps in their coverage, according to a 2017 report by the Bay Area Urban Areas Security Initiative, a federally funded project to improve the region's capacity to respond to catastrophic events. As a result, the messages people receive in one city are often different than those in another.

"California's alert system is, in reality, 58 county alert systems duct-taped together, with 58 different processes and capabilities," said McKinney.

"If we're going to remove the duct tape and bolt and wire it together, so it's all one machine, the state has to do it."

New state laws aim to improve notification in the future. One mandates statewide guidelines and training programs for local governments. Another authorizes counties to automatically enroll residents into emergency notification systems, gaining access to phone numbers through utility bills and other services.

In Paradise, only residents who had registered for CodeRED, the county's alert system, had any chance of knowing what was happening during the Camp Fire. County logs from Nov. 8 through Nov. 10 show that messages reached 16,683 phones but failed to reach 11,057 despite repeated attempts. Paradise Police reached a total of 4,855 phones but did not reach 3,930. Combined, authorities also sent more than 6,000 texts and 6,700 emails that first day, with additional alerts issued in the days following. An estimated 38,702 people lived in the towns of Paradise, Magalia and Concow, with others scattered in more rural parts of the county.

Butte County used a commercial system similar to those used in most Bay Area

counties, connecting to landlines, cellphones, emails and social media.

There is a second type of alert system, also available to Bay Area counties, where notifications such as Amber Alerts can be sent to cellphones regardless of whether residents have opted-in. This system, the Federal Emergency Management Agency's Wireless Emergency Alert (WEA), blankets an area with a warning.

But WEA's geographical targeting, based on a labyrinth of cell towers and a honeycomb of tower signal "sectors," is not terribly precise. Any WEA alert will likely overshoot or undershoot the desired alert area.

Both systems are vulnerable. They rely on local officials, who are inevitably overwhelmed in the early hours of a catastrophe, scrambling to save lives and get resources to the danger, according to McKinney. As the fire consumed Paradise, thousands of calls poured in to 911 — where only two dispatchers were working.

In Paradise, officials issued evacuation alerts for 10 different zones in the city in just one hour, between 7:47 a.m. and 8:43 a.m. But alerts were not sent in four other zones, equally at risk. The Butte County Sheriff's Office, which issued the alerts throughout the county, referred questions about the four zones to Paradise Police, who did not respond to a request for comment.

"It'll never be perfect when there's limited time," said Daniel Gonzales of the RAND Homeland Security and Defense Center, who led a 2016 study about warnings for the U.S. Department of Homeland Security. But with review and more pre-planning and practice, "it should be possible to do much better than what happened in Paradise ... to minimize errors that might happen during a very stressful set of conditions."

To improve matters, officials will have to solve one weakness of any electronic alert system: its dependence on electricity.

Even during a power outage, messages that are sent to a landline have a better chance of getting through. That's because power is sent to the phones through copper wires, which are more heat-resistant. Phone company offices have extensive battery systems, as well as backup generators, according to former CPUC

Commissioner Catherine Sandoval.

But cellphone coverage is less reliable. Cell towers need electricity to operate, but there is no requirement to have backup electrical power at cell towers. Also, cell service relies on fragile glass fiber-optic networks to route calls from the base stations to switching stations, then to customers. And because the systems are designed in a straight line, when one tower goes down, incoming calls reverse direction and bounce back.

Rural areas are especially vulnerable, with more limited networks, said RAND's Gonzales. And emergency officials are not told which towers are down or which carriers have lost service.

In the eastern Paradise neighborhoods first hit by fire, about 56 percent of the 4,272 emergency alert calls failed due to what CodeRED manufacturer OnSolve calls "operator intercept" or "timed out," meaning that the phone has been disconnected, the number changed or no longer in service, or — most likely — the network didn't find sufficient signal strength or bandwidth to make the call work, due to cell tower failure.

By 1:30 the next morning, evacuation orders were nearly futile for residents of the old logging town of Stirling City and other rural communities up on Paradise Ridge, north of Paradise. Records show that a stunning 98 percent of the phone calls made to that area to evacuate never reached a person.

"This has been a growing issue with emergency communications — fostered by transition to more and more people using cellphones and other systems that are reliant on fiber," said Sandoval.

"That's the problem with big fires: The infrastructure burns. As you lose both power and telephones, that creates failure. What you end up with is a situation that takes us back to the 1940s," she said, "where heroic responders drive up and down streets, taking their lives into their hands, using bullhorns."

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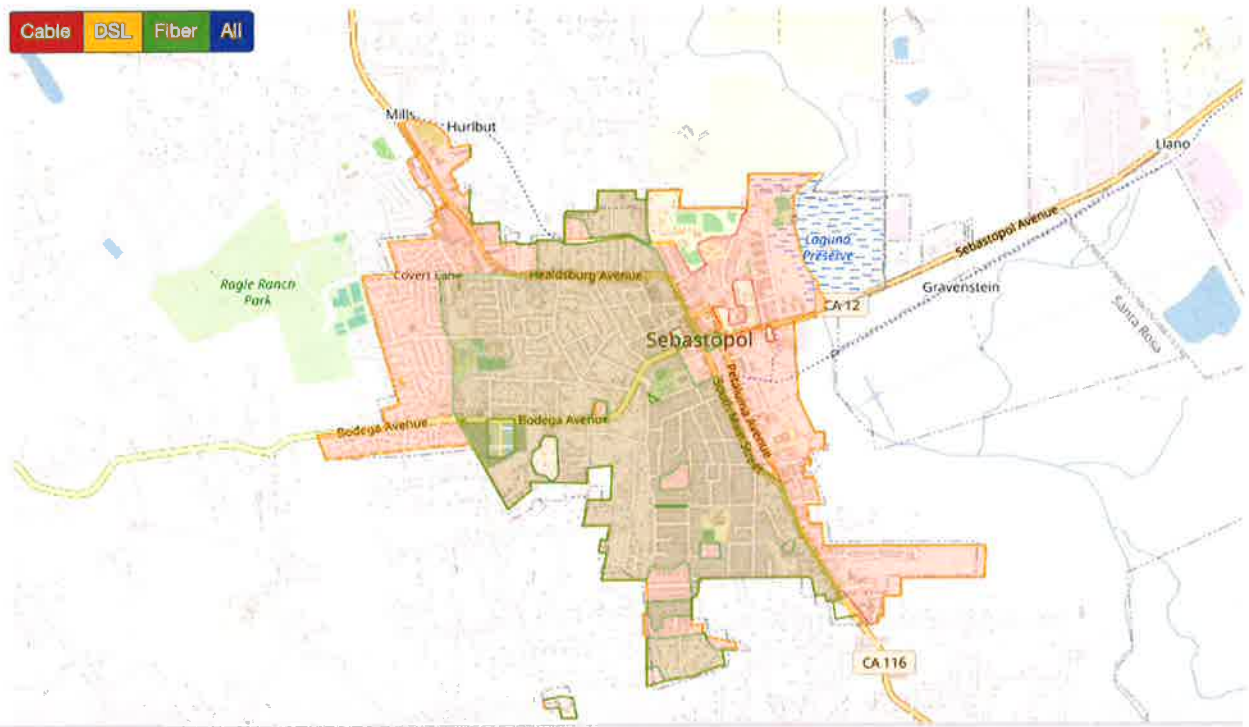
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BEFORE THE BOARD OF SUPERVISORS
OF THE COUNTY OF SANTA CRUZ, STATE OF CALIFORNIA

RESOLUTION NO. _____

On the motion of Supervisor:
Duly seconded by Supervisor:

The following resolution is adopted:

RESOLUTION REQUESTING THE CALIFORNIA PUBLIC UTILITIES
COMMISSION DENY AT&T'S APPLICATIONS TO BE RELIEVED OF ITS
CARRIER OF LAST RESORT AND ELIGIBLE TELECOMMUNICATION
CARRIER DESIGNATIONS

WHEREAS, AT&T is a telecommunications provider that provides communication services to the greater majority of households within the County of Santa Cruz and throughout California; and

WHEREAS, AT&T has submitted applications, A.23-03-002 and A.23-03-003, through the California Public Utilities Commission (CPUC) to be relieved of its Carrier of Last Resort (COLR) and Eligible Telecommunication Carrier (ETC) designations in certain areas of California including areas within the county without identifying an alternative carrier to assume responsibility for maintaining the landline communication services; and

WHEREAS, a COLR obligation ensures that everyone in California has access to safe, reliable, and affordable telephone service; and

WHEREAS, 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; and

WHEREAS, wireless communication alternatives such as cellular and cable VoIP services remain unavailable, unreliable, and fragmented throughout our rural communities; and

WHEREAS, Santa Cruz County, with approximately 167,000 residents located within the Wildland Urban Interface, has experienced seven (7) federally declared disasters since 2017, amplifying the shortcomings of cellular networks while also confirming the dependence on standard landline telecommunication services; and

COB Rev. 8-1-22

Resolution _____

WHEREAS, power outages in the Santa Cruz Mountains frequently persist for several days and sometimes more than a week; and

WHEREAS, the elimination of landlines could leave residents without vital communication services during a disaster or power outages; and

WHEREAS, reliable communication services play a critical role in the safety of our residents; and

WHEREAS, County residents depend upon reliable landline services for emergency services notifications including evacuation warnings, 9-1-1 services, Public Safety Power Shutoffs (PSPS) warnings, and communication with families and friends;

NOW, THEREFORE, BE IT RESOLVED AND ORDERED, that the Board of Supervisors of the County of Santa Cruz requests the CPUC deny AT&T applications, A.23-03-002 and A.23-03-003, requesting to be relieved of its COLR and ETC designations.

BE IT FURTHER RESOLVED AND ORDERED that the Clerk of the Board of Supervisors of the County of Santa Cruz mail a physical copy and submit an electronic copy of this Resolution to the CPUC.

BE IT FURTHER RESOLVED AND ORDERED that the Chair of the Board of Supervisors of the County of Santa Cruz write a letter in opposition to AT&T's applications.

PASSED AND ADOPTED by the Board of Supervisors of the County of Santa Cruz, State of California, this ____ day of _____, 2024, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

JUSTIN CUMMINGS
Chair of the Board of Supervisors

COB Rev. 8-1-22

Resolution _____

ATTEST: _____
JULIETTE BURKE
Clerk of the Board

Approved as to Form:

DocuSigned by:
Jason M. Heath 2/8/2024
JASON M. HEATH (02/07/2024 15739)
Office of the County Counsel

COB Rev. 8-1-22

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Certificate Pages: 4	Initials: 0
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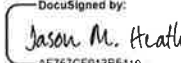
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Signature Adoption: Pre-selected Style
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Timestamp

Sent: 2/8/2024 8:58:50 AM
Viewed: 2/8/2024 9:01:04 AM
Signed: 2/8/2024 9:01:48 AM

Electronic Record and Signature Disclosure:

Accepted: 2/8/2024 9:01:04 AM
ID: 66b6401f-322d-4290-91a6-a3de62a1394b

In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	2/8/2024 8:58:50 AM
Certified Delivered	Security Checked	2/8/2024 9:01:04 AM
Signing Complete	Security Checked	2/8/2024 9:01:48 AM
Completed	Security Checked	2/8/2024 9:01:48 AM
Payment Events	Status	Timestamps
Electronic Record and Signature Disclosure		



COUNTY OF MENDOCINO

Board of Supervisors

Agenda Item Number: 2

DARCIE ANTLE
CLERK OF THE BOARD

501 Low Gap Rd. Room 1010
Ukiah, CA 95482

Email: bos@mendocinocounty.org
Website: www.mendocinocounty.org

Office: (707) 463-4221
Fax: (707) 463-5649

February 2, 2024

California Public Utilities Commission (CPUC)
505 Van Ness Avenue
San Francisco, CA 94102

RE: AT&T Application, Relief of Carrier of Last Resort (COLR) Obligation-Oppose

Dear CPUC Commission,

On behalf of the Mendocino County Board of Supervisors, I am writing to request that the CPUC reject AT&T's application for targeted relief from its Carrier of Last Resort (COLR) legal obligations.

As a "Carrier of Last Resort" (COLR), AT&T must provide "Plain Old Telephone Service" or (POTS) landline phone service upon request to all residential and business customers within its service territory. POTS has a uniform set of minimum service standards and regulations that do not extend to new technologies that provide similar services, such as VoIP. According to the CPUC's Universal Service rules, carriers (such as AT&T) may opt out of their COLR when another COLR provides service and assumes COLR service responsibilities. AT&T's application, on the other hand, requests COLR relief for over 99% of their service territory where AT&T determines an alternative voice provider exists (VoIP, wireless, etc.) and does not request a replacement COLR. AT&T's application also requests expedited approval for future COLR relief through a CPUC Tier 1 Advice Letter process, which does not require CPUC approval. If the CPUC approves, AT&T could cancel service to its POTS customers as early as six months. Over 580,000 AT&T customers would be affected, including residents of Mendocino County, many of whom are senior citizens, live in low-income households, or reside in rural areas where other connectivity is not available to them.

Rural customers have fewer market options to choose from for quality, affordable telecommunications services. Wireless or VoIP is either an unreliable or unavailable option in many locations. POTS remains the only reliable and affordable service option for many in Mendocino County. During an emergency, such as a natural disaster or electrical power outage, customers and first responders need reliable access to 9-1-1 and 2-1-1 services, including the ability to receive alerts and notifications. POTS continues to be one of the most reliable communications tools in the safety net arsenal. COLR relief should only be

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granted when widespread POTS alternatives with uniform, technologically neutral minimum service quality standards are secured.

Mendocino County supports access to essential services for our communities. Much of the rural community is still underrepresented and underserved, lacking universal access to reliable, secure, and open networks.

For these reasons, we respectfully ask CPUC to reject AT&T's application.

Sincerely,



Maureen Mulheren, Chair
Mendocino County Board of Supervisors

CC: The Honorable Jim Wood, California State Assembly, 2nd District
The Honorable Mike McGuire, California State Senate, 2nd District



TOWN OF FAIRFAX

142 BOLINAS ROAD, FAIRFAX, CALIFORNIA 94930
PHONE (415) 453-1584 / FAX (415) 453-1618

March 7, 2024

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

RE: OPPOSITION TO AT&T APPLICATIONS FOR RELIEF OF CARRIER OF LAST RESORT OBLIGATION AND ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION – PROCEEDING A.23-03-002 (COLR) and PROCEEDING A.23-03-003 (ETC RE: LIFELINE).

Dear CPUC President Busching Reynolds and CPUC Commissioners,

On behalf of the Town Council of the Town of Fairfax, I respectfully request that the California Public Utilities Commission (CPUC) reject AT&T's application for targeted relief from its Carrier of Last Resort (COLR) legal obligation, and also its application to relinquish its Eligible Telecommunications Carrier (ETC) designation.

As the Carrier of Last Resort, AT&T must provide Plain Old Telephone Service (POTS) or landline phone service upon request to all residential and business customers within its service territory. AT&T is requesting that the CPUC relieve it of this obligation and allow it instead to decide whether to provide telephone service, even if no other telephone provider in the area is obligated to provide service.

For some of our Town's residents (including the most vulnerable older adults and those with disabilities), especially those in locations with limited or no cell phone service, approval of AT&T's COLR application would result in them paying more for telephone service, receiving lower quality service, being required to purchase phone service as part of an expensive "bundle," or receiving no phone service at all.

If AT&T is allowed to stop being the COLR and transfer its landline service to broadband or VoIP, large numbers of Fairfax residents where cellular service is nonexistent or intermittent at best, will be deprived of a reliable means of communication. Fairfax cannot maintain a resilient, safe, connected, and prepared town without reliable landline service.

Further, if AT&T is allowed to relinquish its Eligible Telecommunications Carrier (ETC) designation, Fairfax's residents with low incomes could lose Lifeline Program access to telephone service (also including elders and the disabled). A reliable telephone service is essential for day-to-day life activities and is critical for medical emergencies, public safety, and natural disasters.

AT&T's application requests COLR relief in providing landline service for over 99% of its service territory where it determines an alternative voice provider exists (VoIP, wireless, etc.) and does not request a replacement COLR. Since the definition of "alternative voice provider exists" is based on demonstration that a carrier's footprint covers only 50% of the census block, residents in the remaining 50% are in danger of having no phone service. Additionally, AT&T's application describes the COLR requirement as an "underutilized landline telephone network," however, in households with limited cell phone coverage, landlines are far from underutilized. Landlines provide essential communications, especially in emergencies, to households without cell coverage and/or other connectivity options.

AT&T's application also requests expedited approval for future COLR relief through a CPUC Tier 1 Advice Letter process that does not require CPUC approval. If the CPUC approves, AT&T could cancel service for its POTS customers in as little as six months.

Over 580,000 AT&T customers would be affected – including many households in Fairfax – many of whom are senior citizens, live in low-income households, or reside in areas where other connectivity is not available to them, placing their lives in jeopardy in the event of an emergency. In the event of an emergency, often internet services are interrupted, which also disables VoIP services.

Fairfax opposes both AT&T applications, as they will reduce access to essential communications services for our communities while increasing costs for those still covered. For some of Fairfax's residents, who are underserved by cellular phone service, there is no substitute for landline telephone service. We strongly urge you to take into consideration the needs of those with no cellular service, those who could lose low-cost telephone services, and those living in areas, like Fairfax, of high risk for wildfire, seismic events, floods and other natural disasters, as you make your decision.

Thank you for your consideration. I strongly urge you to reject both AT&T applications regarding the COLR obligation and the ETC designation.

Sincerely,



Barbara Coler, Mayor
Town of Fairfax

cc: CPUC Ombudsman
Fairfax Town Council
Senator Mike McGuire
Assemblymember Damon Connolly



Susan Wengraf
Vice Mayor and Councilmember District 6

CONSENT CALENDAR
March 12, 2024

To: Honorable Mayor and Members of the City Council
From: Vice Mayor Wengraf (Author), Councilmember Hahn (Co-Sponsor)
Subject: Opposition to AT&T Applications: Relief of “Carrier of Last Resort” and Eligible Telecommunications Carrier Designation

RECOMMENDATION

Adopt a Resolution and send a letter to the CPUC expressing strong opposition to AT&T’s proposal to discontinue being the default landline phone provider, and its proposal to relinquish its eligible telecommunications carrier (ETC) designation. Urge the CPUC to reject AT&T’s application to end traditional landline service in all areas until reliable broadband cellular coverage is available.

FINANCIAL IMPLICATIONS

None

CURRENT SITUATION AND ITS EFFECTS

California residents deserve reliable telecommunication service. The California Public Utility Commission (CPUC) must ensure that traditional landline phone service remains in place until broadband can replace it as a reliable means of communication. Many geographic areas of Berkeley do not have dependable cellular service. Removal of traditional landlines before reliable alternatives are in place, contradicts Berkeley’s strategic goals of creating a resilient, safe, connected and prepared city. Landline telephone service is a lifeline for those in Berkeley who do not have reliable cell service.

AT&T submitted two applications to the California Public Utility Commission (CPUC) on March 3, 2023. One for targeted relief from its carrier of last resort obligation and certain associated tariff obligations ([A23-03-003](#)). The other, to relinquish its eligible telecommunications carrier designation ([A23-03-002](#)).

If the CPUC grants AT&T relief from being the “Carrier of Last Resort” (COLR), i.e. the only carrier legally mandated to provide service to anyone in their service territory who wants it, and therefore stops providing landline service, large numbers of residents living in Berkeley where cellular service is non-existent or unreliable will be deprived of a dependable means of communication. Reliable telephone service is essential for day-to-day life and critical for medical emergencies, public safety and natural disasters. Landlines are overwhelmingly the most reliable method of communication.

Opposition to AT&T Applications: Relief of "Carrier of Last Resort" & ETC

CONSENT CALENDAR

March 12, 2024

In the Berkeley Hills and other high fire risk areas throughout the state, where PG&E regularly conducts Public Safety Power Shutoffs (PSPS), traditional landlines, or Plain Old Telephone Service (POTS), are the only form of reliable communication – unless cell tower back-up generators last throughout the PSPS or disaster, and households with reliable cell service have invested in batteries or generators to keep their phones and modems operating.

Berkeley Fire Chief Dave Sprague stated that, *"The loss of POTS in the region before reliable alternatives are in place creates an unacceptable degradation of public safety for California's residents following a seismic event, wildfire, or other natural disaster."*

Further, if AT&T is allowed to relinquish its Eligible Telecommunications Carrier (ETC) designation, it would no longer be mandated to provide Lifeline service which ensures residents with low incomes, frequently elders and those with disabilities, can have access to telephone service.

BACKGROUND

California's telecommunications policy is founded on an ongoing commitment to universal service by assuring the continued affordability and widespread availability of high-quality telecommunications services.

The California Public Utilities Commission (CPUC) has deemed Carrier of Last Resort (COLR) obligations an important component of universal access to communications services because these obligations ensure that customers who want service, receive it.

As a COLR, AT&T has an obligation to serve all customers in its service area who request service. If the CPUC approves AT&T's application for relief of its COLR obligations, California would have no Carrier of Last Resort and residents would lose their Plain Old Telephone Service (POTS).

ENVIRONMENTAL SUSTAINABILITY AND CLIMATE IMPACTS

Elimination of Plain Old Telephone Service (POTS) could prevent safe evacuation in a natural disaster and interfere with Emergency Response. As extreme weather events increase due to climate change, access to reliable communication is critical to life and safety.

CONTACT PERSON

Vice Mayor & Councilmember Susan Wengraf, Council District 6 510-981-7160

Attachments:

- 1: Resolution
- 2: Letter to CPUC

RESOLUTION NO. ##,###-N.S.

OPPOSITION TO AT&T COLR AND ETC APPLICATIONS

WHEREAS, California's telecommunications policy is founded on an ongoing commitment to universal service by assuring the continued affordability and widespread availability of high-quality telecommunications services; and

WHEREAS, The California Public Utilities Commission (CPUC) has deemed Carrier of Last Resort (COLR) obligations an important component of universal access to communications services because these obligations ensure that customers who want service, receive it; and

WHEREAS, AT&T submitted two applications to the CPUC on March 3, 2023. One for targeted relief from its carrier of last resort obligation and certain associated tariff obligations ([A23-03-003](#)); the other, to relinquish its eligible telecommunications carrier designation ([A23-03-002](#)); and

WHEREAS, If the CPUC grants AT&T relief from being the "Carrier of Last Resort" (COLR) and therefore AT&T stops providing landline service, large numbers of residents living in Berkeley where cellular service is non-existent or unreliable will be deprived of a dependable means of communication; and

WHEREAS, If the CPUC allows AT&T to relinquish its Eligible Telecommunications Carrier (ETC) designation, AT&T would no longer be mandated to provide Lifeline service which ensures residents with low incomes, frequently elders and those with disabilities, can have access to telephone service; and

WHEREAS, Reliable telephone service is essential for day-to-day life and critical for medical emergencies, public safety and natural disasters; and

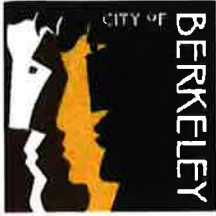
WHEREAS, Berkeley Fire Chief Dave Sprague stated that *"The loss of POTS in the region before reliable alternatives are in place creates an unacceptable degradation of public safety for California's residents following a seismic event, wildfire, or other natural disaster."*

NOW THEREFORE, BE IT RESOLVED by the Council of the City of Berkeley that it strongly opposes AT&T's applications A23-03-003 and A23-03-002.

BE IT FURTHER RESOLVED that the Berkeley City Council strongly urges the CPUC to reject AT&T's A23-03-003 and A23-03-002 applications.

Exhibits

A: Letter to the CPUC



February 12, 2024

California Public Utilities Commission
505 Van Ness Ave
San Francisco, California 94102

RE: Opposition to AT&T's Applications A23-03-003 and A23-03-002

Dear CPUC President and Commissioners,

The City of Berkeley respectfully requests that you reject AT&T's applications for targeted relief from its Carrier of Last Resort (COLR) obligation, and to relinquish its eligible telecommunications carrier (ETC) designation.

All residents deserve reliable telecommunication service. The CPUC must ensure that Plain Old Telephone Service (POTS) remains in place until broadband has achieved that standard.

If AT&T is allowed to stop being the COLR and transfer its landline service to broadband or VOIP, large numbers of Berkeley residents where cellular service is non-existent or intermittent at best, will be deprived of a reliable means of communication.

Berkeley cannot maintain a resilient, safe, connected and prepared city without reliable landline service.

Berkeley Fire Chief Dave Sprague stated that, *"The loss of POTS in the region before reliable alternatives are in place creates an unacceptable degradation of public safety for California's residents following a seismic event, wildfire, or other natural disaster."*

Further, if AT&T is allowed to relinquish its Eligible Telecommunications Carrier (ETC) designation, Berkeley's residents with low incomes could lose Lifeline Program access to telephone service, including elders and those with disabilities. As you know, reliable telephone service is essential for day-to-day life and critical for medical emergencies, public safety and natural disasters.

For some of Berkeley's residents, who are underserved by cellular phone service, there is no substitute for landline telephone service. We strongly urge you to take into consideration the needs of those with no cellular service, those who could lose low cost telephone services, and those living in areas of high risk to wildfire and other natural disasters, as you make your decision.

Respectfully,
Berkeley City Council
Cc: Kate Turner, Cal Advocates; Regina Costa, TURN

https://www.dailycal.org/news/city/city-government/berkeley-city-council-opposes-at-t-landline-withdrawal-supports-nonprofit/article_fce55228-e1c1-11ee-a512-bf2e37ad95a2.html

Berkeley City Council opposes AT&T landline withdrawal, supports nonprofit

Swasti Singhai | Staff
Mar 14, 2024



The Berkeley City Council discussed agenda item 15 regarding the city's landline coverage, previously provided by AT&T, and announced an agreement with Dorothy Day House.

Cole Mortensen | Staff

Amid continued calls from protestors both for and against a ceasefire resolution in Gaza, the Berkeley City Council discussed AT&T's landline coverage and approved a lease agreement for the Dorothy Day House at its regular Tuesday meeting.

The Council unanimously passed its consent calendar. Councilmember Susan Wengraf's agenda item 15, an opposition resolution to AT&T's application to dissolve its designation as a "Carrier of Last Resort," or COLR, was discussed at length during the meeting.

California law requires at least one telephone company to provide telephone service to anyone who requests it, per area. This is in place to ensure that everyone in California has "access to safe, reliable, and affordable telephone service," according to the California Public Utilities Commission, or CPUC, website.

Berkeley, like the majority of California, has AT&T as its designated COLR. The City Council's resolution also noted that landlines are the only types of "reliable communication" in the Berkeley Hills and other high fire-risk areas in California.

"If AT&T is allowed to relinquish its Eligible Telecommunications Carrier (ETC) designation, Berkeley's residents with low incomes could lose Lifeline Program access to telephone service, including elders and those with disabilities," the City Council said in a letter to CPUC. "For some of Berkeley's residents, who are underserved by cellular phone service, there is no substitute for landline telephone service."

Although many public commenters expressed support for agenda item 15, an AT&T spokesperson clarified that phone services aren't expected to be removed.

He added that the transition to newer technology and the removal of landline services was prompted by the fact that AT&T's current landline is on a copper-wire network which has parts that are no longer being made.

The council also authorized the execution of a lease agreement with Bay Area nonprofit Dorothy Day House, which provides shelter and services for unhoused people in the community. Dorothy's Closet, a retail thrift store created by Dorothy Day House and Rebuilding Together, is set to occupy a 1,400 square-foot unit inside the Telegraph-Channing Mall.

Dorothy's Closet is set to have a five-year lease on the space, starting retroactively in May of 2023. The city agreed to abate the equivalent of 18 months of revenue, or \$56,952, to account for the retroactive lease date.

Dorothy Day House executive director Robbi Montoya expressed her excitement for this Dorothy's Closet becoming an employment social enterprise, or ESE, as it will simultaneously provide free clothing, create jobs and job training opportunities.

Montoya noted that the retail space is going to fill a need in Berkeley, as most people have to choose how to allocate their limited money, either purchasing food or clothing.

Dorothy's Closet is set to have a soft opening in the coming months. Montoya said the storefront will add to Berkeley's commitment to taking care of all residents, regardless of housing status.

The values of mutually beneficial relationships have been a part of Dorothy Day Houses since its inception, Montoya noted. She hopes Dorothy's Closet will restore "dignity and some normalcy" to the unhoused community.

"We've been around for 33 years," Montoya said. " (The Dorothy Day House) was solely run by volunteers and so that manifested this really altruistic kind of atmosphere, it's kind of a fabric of our DNA."

Contact Swasti Singhai and Chesney Evert at newsdesk@dailycal.org.

Swasti Singhai

City Government Beat Reporter

Chesney Evert

City Government Reporter