

COUNTY OF EL DORADO

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KIM DAWSON
Clerk of the Board



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June 11, 2024

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

RE: Judge Glegola’s Proposed Decision to Dismiss AT&T California’s Application, Relief of Carrier of Last Resort Obligations – Application (A.) 23-03-003 - SUPPORT

Dear President Reynolds and Commissioners,

On behalf of the El Dorado County Board of Supervisors, I write in strong support of Administrative Law Judge Glegola’s Proposed Decision to dismiss AT&T California’s application for relief from their Carrier of Last Resort (COLR) obligations, submitted on May 10, 2024. If approved, AT&T’s application would have canceled service to over 580,000 customers relying on Plain Old Telephone Service (POTS) under their COLR obligations.

Maintaining the COLR obligations is crucial in ensuring that all residents have access to essential communication services, regardless of their geographic location or economic status. We shared the concerns of many other counties that AT&T’s proposals would have disproportionately affected critical, lifeline coverage to senior citizens, low-income households, and residents in rural and underserved areas who rely on POTS.

Like most California counties, El Dorado County faces the threat of natural disasters like fires, floods, and severe storms. During emergencies, copper landlines are the most dependable form of communication. Cellular and VoIP services are unreliable in rural areas especially during power outages caused by wildfires or extreme weather. In rural areas, POTS is sometimes the only connectivity available. We also share serious equity concerns with AT&T’s proposal. For some of the most vulnerable residents, especially those in more geographically remote and rural areas without cell phone reception, approval of AT&T’s application would result in customers either: paying more for telephone service; receiving lower quality service; being required to purchase phone service as part of an expensive “bundle”; and/or receiving no phone service at all.

The Commission’s COLR withdrawal rules require a new COLR to volunteer to replace the one withdrawing. No potential COLR applied to replace AT&T. Given these facts and the harmful

public safety and equity impacts AT&T's proposal would have on Californians, we respectfully ask the CPUC to accept the Proposed Decision to dismiss AT&T's application.

Sincerely,

Wendy Thomas, Chair
El Dorado County Board of Supervisors

Cc: Senator Mike McGuire
Assemblymember Damon Connolly

Attachment A: El Dorado County March 12, 2024 letter of Opposition to Application of AT&T California for Relief from its Carrier of Last Resort Obligation

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March 12, 2024

California Public Utilities Commission
Public Advisor's Office
505 Van Ness Avenue
San Francisco, CA 94102

Re: Opposition to Application of AT&T California for Relief from its Carrier of Last Resort Obligation (A.23-03-003)

Dear California Public Utilities Commission,

On behalf of the El Dorado County Board of Supervisors, I am writing to inform you of our opposition to the AT&T request for targeted relief from its Carrier of Last Resort (COLR) obligation and certain associated tariff obligations coming before the California Public Utilities Commission (CPUC).

AT&T is currently the COLR and required to provide landline services in El Dorado County which many residents and businesses rely on due to affordability and unreliable cellular service in rural areas. Landline services have a uniform set of minimum requirements that do not extend to new technologies such as cellular or Voice over Internet Protocol (VoIP). According to CPUC rules, carriers may only opt out of their COLR when another COLR is providing service and assumes responsibilities for an area. This ensures that California residents and businesses have access to safe, reliable, and affordable telephone service which is essential in wildfire prone areas such as El Dorado County.

AT&T has failed to identify a replacement COLR and no equivalent pathway to guarantee universal service in its place. If AT&T's application is granted, the decision would mostly serve to harm our most vulnerable populations, including low-income customers who participate in the LifeLine program which provides discounted home phone and cell phone services to qualified households and those who participate in the Deaf and Disabled Telecommunications Program which provides communications equipment and services to persons with disabilities. Also, if AT&T's application is granted, residents and businesses may not be able to maintain a landline as emergency backup for when there are outages due to cell phone networks being damaged or destroyed by winter storms, wildfires, or other severe weather events. If the CPUC approves AT&T's application, customers could be required to pay more for telephone service,

receive lower quality service, buy phone service as part of an expensive “bundle,” or depend on cellular or VoIP services (which are not reliable or available in some areas).

AT&T's request would affect 15 census defined places (CDP) including incorporated jurisdictions and unincorporated communities in El Dorado County. This includes the following areas:

1. Auburn Lake Trails CDP and surrounding areas
2. Cameron Park CDP and surrounding areas
3. Camino CDP and surrounding areas
4. Cold Springs CDP and surrounding areas
5. Coloma CDP and surrounding areas
6. Diamond Springs CDP and surrounding areas
7. El Dorado Hills CDP and surrounding areas
8. Georgetown CDP and surrounding areas
9. Grizzly Flats CDP and surrounding areas
10. Meyers CDP and surrounding areas
11. Placerville city and surrounding areas
12. Pollock Pines CDP and surrounding areas
13. Shingle Springs CDP and surrounding areas
14. South Lake Tahoe city and surrounding areas
15. Tahoma CDP and surrounding areas

Many of these areas have recently been impacted by wildfires, floods, or severe storm damage and are undergoing infrastructure repair and reconstruction or are in high fire/severe weather threat areas. During an emergency, customers and first responders need reliable access to 9-1-1, including the ability to send or receive alerts and notifications. Cellular and VoIP services are unreliable in rural areas especially during power outages caused by wildfires or extreme weather.

El Dorado County residents and businesses deserve safe, reliable, and affordable telephone service and AT&T needs to remain the COLR in order to ensure that all Californians maintain access to landline services. The El Dorado County Board of Supervisors is requesting the CPUC reject AT&T's application for relief from its COLR obligation.

Sincerely,



Wendy Thomas, Chair
El Dorado County Board of Supervisors

Cc: Rural County Representatives of California
California State Association of Counties