March 12, 2024

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, CA 94102

public.advisor@cpuc.ca.gov SENT VIA EMAIL

**Subject: AT&T Carier of Last Resort Application to the California Public Utilities Commission**

To Whom it May Concern:

The Siskiyou County Board of Supervisors is writing this letter to urge the California Public Utilities Commission (CPUC) to reject AT&T’s application for relief of Carrier of Last Resort (COLR) obligations.

AT&T is a COLR and therefore required to 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 does not extend to new technologies that provide similar services, such as wireline VoIP. According to the CPUC’s Universal Service rules, carriers (such as AT&T) may opt out of their COLR when another COLR is providing service and assumes COLR service responsibilities. AT&T’s application to the CPUC, on the other hand, requests COLR relief for over 99% of their service territory where AT&T determines an alternative voice provider exists 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 approved by the CPUC, AT&T could cancel service to its POTS customers as early as six months.

Rural customers have few market options to choose quality, affordable telecommunications services to suit the unique needs of our communities. 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 service, including the ability to receive alerts and notifications. The western rural areas of the county have scattered areas of no cell coverage, and many areas without cell coverage will have no means of reachability during an emergency event. POTS is the most reliable communications tool in the safety net arsenal.

A majority of Siskiyou County is within a Tier 2 or Tier 3 High Fire Threat District, and many of these areas depend on landline and/or internet-based warning and alert platforms. To date, copper phone lines have been reliable and constant for our landline dependent residents. If copper lines were removed and not replaced, communication with these areas would be greatly hindered. Many of the

residents in these areas are an ageing population on a fixed income and are considered socially vulnerable.

Alternative technologies identified by AT&T to potentially serve customers do not have commensurate regulatory treatment or consumer protections. For example, AT&T’s request does not consider whether the customers affected reside in a high fire threat district and can reliably and continuously access alternative services, such as cell phones or VoIP.

While AT&T will be able to pre-position its resources to withdraw its wireline infrastructure, customers will not be similarly situated to find a suitable alternative service to transition their households and/or businesses. This is especially true of our elderly, vulnerable, and/or disadvantaged populations. Moreover, if a replacement provider decides to no longer provide service or maintenance in the future, communities may have zero telecommunications options. It is essential for customers to retain, at their option, resilient communications services such as POTS. COLR relief should not be granted without securing widespread alternatives with uniform, technologically neutral minimum service quality standards of POTS alternatives.

Finally, Siskiyou County is committed to providing services to our citizens in vulnerable communities who rely on POTS lines. AT&T hasn’t even met current obligations to provide universal access to reliable, secure and open networks.

For these reasons, we respectfully ask the CPUC to reject AT&T’s application. This letter was approved by the Siskiyou County Board of Supervisors on March 12, 2024, by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

Sincerely,

Michael N. Kobseff

Chair, Board of Supervisors

cc: Assemblywoman Megan Dahle

 Senator Brian Dahle

 Rural County Representative of California (RCRC)

 California State Association of Counties (CSAC)

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