



BOARD OF SUPERVISORS
COUNTY OF HUMBOLDT

825 5TH STREET, ROOM 111
EUREKA, CALIFORNIA 95501 PHONE: (707) 476-2390

January 25, 2024

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

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

Dear CPUC Commission:

On behalf of the Humboldt County Board of Supervisors, I am writing to strongly request that the CPUC reject AT&T's application for relief of COLR obligations.

AT&T is a "Carrier of Last Resort" and 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 service, 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, 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 fewer 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. POTS is the most reliable communications tool in the safety net arsenal. Also, 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 take into account 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 service 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, Humboldt 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.

Sincerely,



Rex Bohn, Chair
Humboldt County Board of Supervisors

RB:kh

cc: California State Association of Counties (CSAC)
Rural County Representatives of California (RCRC)