



December 16, 2019

Via E-mail:

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Cynthia Walker  
Director, Communications Division  
California Public Utilities Commission  
505 Van Ness Ave. 3d Floor  
San Francisco, CA 94102

Re: Draft Resolution T-17666

Dear Ms. Walker and Mr. Clark:

Pursuant to Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), and consistent with the instructions in the November 1, 2019 Notice of Availability (“Notice”), the Schools, Health & Libraries Broadband (SHLB) Coalition hereby expresses its opposition to the proposed Resolution T-17666. We submit that shortening the time period to report on reimbursements from the California Teleconnect Fund, as proposed by this Resolution, could harm the ability of schools, libraries, health care providers and anchor institutions to receive proper reimbursement from the Fund.

The SHLB Coalition is a national public interest organization headquartered in Washington DC, with over 175 members from across the U.S, including several in California. Our mission is to promote open, affordable, high-quality broadband for anchor institutions and their communities. We participate actively before the Federal Communications Commission (FCC) on issues involving the E-rate program and the Rural Healthcare (RHC) Program. More information about our work is available at [www.shlb.org](http://www.shlb.org).

It was recently brought to our attention that the proposed resolution would shorten the deadlines for reimbursement and could harm the ability of schools, libraries and health organizations to afford the high-quality broadband services that they need to serve their students, library patrons and health care patients. We have reviewed several of the comments filed in this proceeding and believe that they raise significant questions and concerns about the timeline of this proposed resolution compared to the funding decisions for the E-rate and RHC programs. While some E-rate applicants receive FCC and USAC approval in a couple of months, many other E-rate applicants wait more than six months for a decision (and sometimes years for special construction applications). Similarly, applicants in the RHC program have encountered significant delays in the past few years as the demand for funding has exceeded the program’s

funding cap. For instance, even though the RHC application filing window closed on June 30<sup>th</sup> of 2018, most applicants did not receive funding notices until the spring of the following year. The proposed 60-day time deadline does not sync up with these federal programs and processes. SHLB shares the concerns that inadvertent harm could be caused to schools, libraries and healthcare providers should this proposal be adopted.

While we appreciate the Commission's desire to synchronize the program with the Lifeline program, the E-rate and RHC programs are very different and are much more complicated; E-rate and RHC applications often involve millions of dollars at a time, compared to the applications by individual low-income people seeking \$9.25 per month from the federal Lifeline program.

We understand that the Commission staff would like to obtain data to forecast program demand. An alternative approach is for the Commission to ask broadband providers to file the data that is necessary for the staff to do the forecasts within 60 days but allow them up to a year to file the actual requests for reimbursements. This would achieve the Commission's data collection goal, sync better with the federal processes, and not discourage broadband providers from serving anchor institutions.

Sincerely,



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