



**COUNTY OF LAKE  
BOARD OF SUPERVISORS**

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February 27, 2024

Alice Busching Reynolds, President  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Proceeding A.23-03-003 – REJECT AT&T California’s Request for Approval to be Relieved of its Carrier of Last Resort (COLR) Obligations in Certain Areas of California**

Dear Honorable President Busching Reynolds and Commissioners:

As you are keenly aware, AT&T California is requesting your Commission’s approval to be relieved of its Carrier of Last Resort (COLR) obligations in many areas of their existing service territory. Additionally, their application seeks expedited approval for future COLR relief through a CPUC Tier 1 Advice Letter process; this would give the company greater flexibility to eliminate service responsibilities without additional CPUC approval. The Lake County Board of Supervisors asks your Commission to Reject AT&T’s application, as it would create undue hardship and risk for many Californians, specifically including Lake County residents in the following communities:

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

In rural areas where population density is low, like many of the above-detailed Lake County communities, the market frequently leaves residents with few quality, affordable telecommunications options. For numerous Lake County residents and rural Californians, Plain Old Telephone Service (POTS) is a critical lifeline, and the most reliable means to access 911 and 211 services.

AT&T's request seemingly fails to consider the considerable dangers this creates for communities in High Fire Threat areas that do not have reliably continuous alternative services.

During Service Quality Standards Testimony of September 7, 2023, Lake County's District 5 Supervisor, Jessica Pyska, made your Commission aware a wildfire had broken out near a cross-country race, which was held at a Lake County winery ranch the prior afternoon, September 6. Power went out during this event, and students from four schools, three of which were outside of Lake County, struggled to obtain emergency information due to very limited cellular connectivity.

The lack of uniform and technology neutral minimum service quality standards for telecommunications (*e.g. cellular and VoIP*) providers was a factor in this deeply disconcerting occurrence; this highlights the fact POTS is a critical backstop for lesser-regulated technologies.

Thankfully, in the case of that September 2023 event, everyone was ultimately safe. However, the property address where this occurred is among those for which AT&T is applying to be relieved of COLR obligations. Plainly, COLR relief should not be considered without meaningfully addressing the vulnerabilities it would create. Winter storms of recent years have likewise left communities with damaged landlines and without cell service for periods of time. Thousands of Lake County residents living in rural communities rely on telecommunications to manage medical and other critical needs.

California's rich and diverse outdoor recreational opportunities are among its points of considerable strength, and many such areas are in rural communities that could become less safe, should AT&T's application be approved. Communities near Lake County's Lake Pillsbury, for example, draw visitors from around the region and beyond, thanks to extraordinary water-based recreation, fishing, hiking and other opportunities. This area is highly remote, and cellular phone service can be unreliable. Even with AT&T's COLR obligations intact, disruptions to service due to infrastructure damage and other factors have threatened residents' and visitors' ability to report fire and medical emergencies.

AT&T represents service will be maintained for landline customers during a transition period to newer technologies. Yet, they are providing your Commission, and Californians, no meaningful assurance service will be continually available in the future. Natural disasters and other events frequently damage communications equipment and infrastructure, and there is no guarantee of timely repair. While emerging technologies may be promising, availability and adoption in rural communities *typically* significantly lags more population-dense areas. Your Commission's engagement and commonsense regulation is essential to ensuring no California communities are left with *zero* telecommunications options.

Finally, AT&T's request fails to adequately consider the relative difficulty vulnerable customers (*such as those of advanced age, medically vulnerable and economically disadvantaged individuals*) may have in accessing alternative services. As an Eligible Telecommunications Carrier (ETC), AT&T has long benefited from federal government-established Universal Service Funds, which expressly seek, "to provide high quality and affordable telephone service to customers at all income levels." It is fully reasonable for your Commission to reject the current application, and insist more adequate planning for vulnerable communities is undertaken first.

Taking away a tool that meaningfully promotes public safety without first replacing its functionality is clearly wrong, and antithetical to the State's interest in well serving ALL residents. Our Board asks that your Commission put vulnerable Californians first and REJECT AT&T California's Request for Approval to be Relieved of its Carrier of Last Resort (COLR) Obligations.

Sincerely,

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Bruno Sabatier, Chair  
Lake County Board of Supervisors