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Aug 30th 2018

Via ECFS  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: In the Matter of Petition of USTelecom for Forbearance Pursuant to  
47 U.S.C. Section 160(c); WC Docket No. 18-141; Category 1**

Dear FCC,

I run Underground Service Alert of Northern California and Nevada, commonly known as USA North 811, which is the organization to "call 811 before you dig" to get underground utility lines located and marked with paint prior to excavation in Northern California and Nevada. Our call center is a nonprofit corporation that is funded by 1,508 utility companies in Northern California and Nevada. We are an efficient and cost-effective partnership between private-sector companies like AT&T and Pacific Gas and Electric and public-sector entities like cities, counties, and water districts. Our call center acts as "dispatch" for all of these companies so the excavator only has one place to call when requesting underground facilities to be located and marked instead of having to contact each facility owner individually.

The "call before you dig" service, which is free to the excavator and funded by the utility owners, plays a key role in protecting our underground utility infrastructure from excavation damage. This includes communications cables that are the backbone of the Internet. We have deployed many of our call center agents to work from home so our office isn't a single point of failure, as it's critical for us to be open and operational 24/7/365. We like to diversify the internet service providers used by our home agents to avoid "area outages" that occasionally affect all internet providers. For that reason I support competition in the marketplace to allow small fiber companies to compete with the giants. I want multiple internet provider options. We currently have a few home agents that use Sonic, a small carrier based in Santa Rosa, California, and have been very pleased with their reliability, pricing, and service so far. We also use AT&T, Comcast and Verizon, but are typically limited to one or two internet providers in each area. We would like to have multiple choices so we can diversify and not put all of our eggs in one basket, so to speak.

When considering whether or not to allow small fiber companies to lease last-mile copper from the former Bell carriers at cost, please consider provider diversity for disaster recovery and business continuity purposes, in addition to price competition, as benefits for users.

Respectfully,

James Wingate

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