

March 7, 2014

Letter ? Expression of Interest  
VIA ECFS

Federal Communications Commission  
445 12th Street, SW 20024  
Washington, DC

Re: Expression of Interest ? Rural Broadband Trials  
Connect America Fund, WC Docket No. 10-90

This letter is to express the City of Marina's interest in participating in the Rural Broadband Trials announced at the January 30th FCC Open Meeting. While we do not have a project to propose, we want to take this opportunity to document our Rural California's need for high-speed Internet service. We respectfully ask the Federal Communications Commission to consider California's need when making decisions regarding the Rural Broadband Trials and any future initiatives related to the Connect America Fund.

#### Background

California is a net contributor to the Universal Service Fund; however, California has had difficulty in the past making a case for Federal funding for broadband deployment because federal definition of rural doesn't apply to many communities and tribal governments.

There are approximately 5.1 million rural residents in California, which is 10% of all rural people in the United States. Of California's 58 counties, 44 are rural and approximately 13% of the population resides in rural areas. 80% of California's landmass is designated rural.

California has set a goal of reaching 98% broadband deployment and 80% adoption by 2017. In order to reach the 98% goal, we estimate that there are currently 225,000 unserved households in rural California.

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In order to reach that goal the California Advanced Services Fund (CASF) was created to support deployment projects in unserved and underserved areas in 2007. In 2010, CASF

was expanded from its original \$100 million to \$225 million and now includes three separate funding accounts: (1) the Infrastructure Grant Account, (2) the Consortia Grant Account, and (3) the Revolving Loan Account. Another \$90 million was added to CASF in 2013. Key provisions of CASF include:

? A maximum CASF grant award of 70 percent of project costs for unserved areas and 60 percent for underserved areas;

? A definition of an underserved area, where broadband is available, but no wireline or wireless facilities-based provider offers service at advertised speeds of at least 6 mbps download and 1.5 mbps upload. ?

This year, the California Public Utility Commission is identifying--with the help of 14 regional broadband consortia --high priority areas throughout the state in need of broadband infrastructure, in order to allow California to reach the 98% deployment goal.

The Commission's desire is to have the regional broadband consortia leaders identify the areas for consideration, give current providers the opportunity to challenge a proposed area's status or commit to serve it, and then go forward accepting proposals to serve the adopted high priority areas without service commitment from other providers. The Commission hopes to adopt a list of high priority areas by the end of summer 2014.

If the FCC considered providing matching funding for CPUC identified high priority areas, the state would likely pick up the lion's share of the funding needed and federal funding could be stretched further, while achieving its ultimate goal. We estimate that an additional \$120 million is necessary in matching funds in order to close the digital divide in California, serve 225,000 households and reach the 98% goal.

#### Proposed technology

Many of the providers that would serve the high priority areas are seeking fiber for middle-mile backhaul in order to allow remote communities to have reasonably priced service, fiber to many anchor institutions along or near the backhaul routes, and are proposing to use wireless technology for last mile to connect resident and business. Backhaul limitations contribute to incumbent providers bypassing or providing substandard service to remote rural areas.

#### Local or Tribal Government Participation

Under the current CASF rules, 68 of the 111 Tribal Governments in California qualify for funding; however under current federal funding opportunities (Tribal Mobility Fund-Phase 1) only eight Tribes representing less than 1000 people qualify. Similarly, of the 225,000 unserved households in rural California needed to reach the 98%, federal funding opportunities currently available only allow 35,000 rural Californians to qualify.

#### Geographic Territory, Existing Providers and List of Anchor Institutions

Once the high priority areas are agreed upon, the City of Marina in partnership with the California Public Utilities Commission will be able to provide greater detail using information such as: 1) Census blocks; 2) Addresses (household or premise); 3) Parcel identifiers (Assessor's Parcel Number - APN); and lists of anchor institutions.

Thank you for considering our Expression of Interest in your decisions about the amount of funding that will be allocated in the Rural Broadband Trials. We commend you in this effort to connect rural communities and are ready to help you close the digital divide. You may reach me at (831) 384-1224 or llong@ci.marina.ca.us. Thank you.

Sincerely,

Layne P. Long,

City Manager