



September 4, 2014

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CALIFORNIA EMERGING TECHNOLOGY FUND
www.cetfund.org

The Hearst Building
5 Third Street, Suite 320
San Francisco, CA 94103
415-744-CETF (2383)

1000 N. Alameda Street, Suite 240
Los Angeles, CA 900121
213-443-9952

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

RE: Reply Comments for Proposed Rules: WC Docket No. 10-90, WT Docket No. 10-208, WC Docket No. 14-58, WC Docket No. 07-135, CC Docket No. 01-92

The California Emerging Technology Fund (CETF) supports the Federal Communications Commission (FCC) in establishing the Connect America Fund (CAF) to preserve and advance voice and robust broadband services, both fixed and mobile, in high-cost rural areas of the nation that the marketplace would not otherwise service. We are in general agreement with the comments submitted by the American Farm Bureau Federation (Farm Bureau) and Deere & Company and provide the following additional input to the CAF FNPRM:

- California is very large geographically with the most diverse and difficult terrain of any state.
- California had an unserved territory the size of Kentucky when CETF began in 2007 and before the California Public Utilities Commission (CPUC) established the California Advanced Services Fund (CASF).
- California is the top agriculture production state in the nation and needs broadband deployment in rural farm areas to improve productivity, resource efficiency, and access to markets to feed the nation and world.
- California has stepped up and is doing its part with broadband planning, policy, and funding, but national leadership is pivotal to meet critical rural infrastructure deployment needs to achieve the vision and goals in the National Broadband Plan.
- Pursuant to new authority from the California Legislature, the CPUC expanded and amended the eligibility rules for the CASF program to allow non-telephone corporations to apply for CASF funds. The new rules allow the CPUC more flexibility in supporting infrastructure deployment in rural and remote unserved and underserved areas by promulgating safeguards and the mechanisms to enforce the terms and conditions of the grant awards and to impose penalties as necessary. This approach will ensure greater certainty in performance on projects.

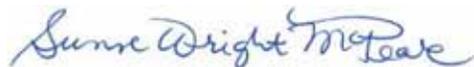
A review of the CASF program found that there is a need for more last-mile projects in unserved and underserved areas of the state, which are often located in high cost rural areas where the deployment of broadband is cost-prohibitive because of low population density and rough terrain. It was also found that there are non-regulated providers using new technologies that may be uniquely suited to provide cost-effective broadband service in high cost rural areas of the state.

- The CPUC released Draft Resolution T-17452 on August 11, 2014, that authorizes up to 10% matching funds from CASF for FCC Rural Broadband Experiments in California. This demonstrates a sincere commitment by the CPUC to partner with the FCC to close the Digital Divide. The CPUC will vote on the resolution on September 11, 2014. The resolution pre-authorizes CASF monies for any California projects that the FCC selects and provides for such projects to be subject to the FCC Rural Broadband Experiments rules. CETF urges the FCC to commit at least 10% (at least \$10 million) of the available funding for Rural Broadband Experiments to be invested in California (which is 14% of the U.S. population in addition to being a major agricultural producer).

As previously stated, California needs national leadership to meet critical rural infrastructure deployment needs. CETF supports the establishment of the CAF to preserve and advance voice and robust broadband services in high-cost rural areas of the nation that the marketplace would not otherwise service and urges the FCC to continue to improve and expand CAF to address rural infrastructure deployment needs. CETF has been and will continue to be a strong partner with the federal government and the FCC in promoting universal voice service and broadband access.

We thank the Federal Communications Commission for this opportunity to comment on this matter.

Sincerely,



President and CEO
California Emerging Technology Fund