



COUNTY OF MENDOCINO

Board of Supervisors

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April 24, 2025

The Honorable Tina McKinnor
Member, California State Assembly
1021 O Street, Suite 5520
Sacramento, CA 95814

RE: Assembly Bill 470 - Telephone Corporations: Carriers of Last Resort - OPPOSE
As Amended April 22, 2025

Dear Chairwoman McKinnor,

The Mendocino County Board of Supervisors is writing to respectfully oppose AB 470, as amended on April 22, 2025, which proposes significant changes to the statutory designation of "carrier of last resort" (COLR) responsibilities and gradually eliminate reliable and affordable access to basic telephone service for all Californians.

While we understand and share the goal of ensuring reliable telecommunications access for all Californians, especially in underserved and rural areas, this bill as written raises substantial concerns related to:

Reduced Consumer Protections

AB 470 appears to weaken the CPUC's authority to enforce universal service obligations, potentially allowing incumbent carriers to withdraw essential landline services without ensuring viable, affordable, and functionally equivalent alternatives are in place. This change could disproportionately impact rural, elderly, disabled, and low-income populations who continue to depend on traditional phone services for basic communication and emergency access.

Premature Deregulation

The bill's provisions risk accelerating the removal of COLR obligations before robust, universally accessible broadband and wireless infrastructure is in place, especially in rural areas. This could deepen the digital divide and leave communities behind as providers focus on more profitable urban markets.

The CPUC's primary role is to balance procedures and safeguards to protect consumers while ensuring the delivery of safe, reliable utilities and infrastructure at reasonable rates. COLR regulations are crucial and must continue to focus on consumer protection and universal access while facilitating the transition to modern networks.

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Mendocino County supports the shift toward technologies that ensure reliable, redundant, and widespread access to both internet and voice services. However, AB 470 does not provide a genuine process for rural communities to access these modern telecommunications options. In Mendocino County, many residents still rely on 'Plain Old Telephone Service' (POTS) as their only dependable and affordable service option. POTS also remains one of the most reliable communication tools in the safety net for rural counties. Any reform to the COLR framework must preserve core principles of universal access, affordability, and public safety.

For these reasons, the County of Mendocino continues to oppose AB 470.

Sincerely,



John Haschak, Chair
Mendocino County Board of Supervisors

cc: Members of the Assembly Communications and Conveyance Committee
The Honorable Mike McGuire, Member of the California State Senate
The Honorable Chris Rogers, Member of the California State Assembly
Tracy Rhine, Senior Policy Advocate, Rural County Representatives of California