



COUNTY OF MENDOCINO

Board of Supervisors

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February 2, 2024

California Public Utilities Commission (CPUC)
505 Van Ness Avenue
San Francisco, CA 94102

RE: AT&T Application, Relief of Carrier of Last Resort (COLR) Obligation-Oppose

Dear CPUC Commission,

On behalf of the Mendocino County Board of Supervisors, I am writing to request that the CPUC reject AT&T's application for targeted relief from its Carrier of Last Resort (COLR) legal obligations.

As a "Carrier of Last Resort" (COLR), AT&T must provide "Plain Old Telephone Service" or (POTS) landline phone service upon request to all residential and business customers within its service territory. POTS has a uniform set of minimum service standards and regulations that do not extend to new technologies that provide similar services, such as VoIP. According to the CPUC's Universal Service rules, carriers (such as AT&T) may opt out of their COLR when another COLR provides service and assumes COLR service responsibilities. AT&T's application, on the other hand, requests COLR relief for over 99% of their service territory where AT&T determines an alternative voice provider exists (VoIP, wireless, etc.) and does not request a replacement COLR. AT&T's application also requests expedited approval for future COLR relief through a CPUC Tier 1 Advice Letter process, which does not require CPUC approval. If the CPUC approves, AT&T could cancel service to its POTS customers as early as six months. Over 580,000 AT&T customers would be affected, including residents of Mendocino County, many of whom are senior citizens, live in low-income households, or reside in rural areas where other connectivity is not available to them.

Rural customers have fewer market options to choose from for quality, affordable telecommunications services. Wireless or VoIP is either an unreliable or unavailable option in many locations. POTS remains the only reliable and affordable service option for many in Mendocino County. During an emergency, such as a natural disaster or electrical power outage, customers and first responders need reliable access to 9-1-1 and 2-1-1 services, including the ability to receive alerts and notifications. POTS continues to be one of the most reliable communications tools in the safety net arsenal. COLR relief should only be

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granted when widespread POTS alternatives with uniform, technologically neutral minimum service quality standards are secured.

Mendocino County supports access to essential services for our communities. Much of the rural community is still underrepresented and underserved, lacking universal access to reliable, secure, and open networks.

For these reasons, we respectfully ask CPUC to reject AT&T's application.

Sincerely,



Maureen Mulheren, Chair
Mendocino County Board of Supervisors

CC: The Honorable Jim Wood, California State Assembly, 2nd District
The Honorable Mike McGuire, California State Senate, 2nd District