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Board of Supervisors

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Joelle Gallagher
Chair

March 12, 2024

The Honorable John Reynolds, Commissioner
California Public Utilities Commission
505 Van Ness Avenue,
San Francisco, CA 94102

Re: AT&T California's Request for Relief of Carrier of Last Resort Obligation (Application 2-03-00)

Dear Commissioner Reynolds:

We are writing to express our strong opposition to the Application submitted by Pacific Bell Telephone Company d/b/a AT&T California (AT&T) for Targeted Relief from its Carrier of Last Resort Obligation and Certain Associated Tariff Obligations (Application). Denial of this Application is imperative due to its premature nature considering the current geographic limitations to broadband coverage. Furthermore, AT&T has failed to present any viable alternative to fulfill its Plain Old Telephone Service (POTS) obligations, which would disproportionately affect the rural, elderly, and low-income residents of Napa County.

The removal of POTS service, particularly in areas lacking broadband coverage, poses a severe threat to the safety and well-being of our residents, especially during disasters when communication is crucial. If approved, AT&T could cease POTS service to its customers in as little as six months. During the 2017 fires, major wireless carriers faced challenges in repairing or temporarily providing connectivity due to power outages, road closures, and mandatory evacuation orders. Dozens of towers were damaged or destroyed, including one on Atlas Peak in Napa County, resulting in a significant outage and leaving residents without vital cellular service. Given Napa County's vulnerability to fires, floods, and other natural disasters, ensuring a reliable communication infrastructure is paramount.

AT&T's assertion – that 99.9 percent of the territory from which it seeks to withdraw has alternative voice providers – is misleading and inaccurate. Moreover AT&T's failure to request a replacement COLR is concerning. The California Public Utilities Commission's (CPUC) broadband map clearly indicates significant gaps in broadband coverage throughout Napa County, undermining AT&T's claim.

POTS continues to be a critical lifeline for many of Napa County's rural, elderly, and low-income residents: it is a uniquely affordable, reliable, and regulated product for this population. Moreover, AT&T has not adequately addressed the affordability and reliability of alternative services, especially in high-risk fire areas. The experiences shared by our residents underscore the inadequacy of cellular phone coverage in rural and mountainous regions during emergencies, further emphasizing the indispensability of POTS. Granting AT&T's Application would leave vulnerable populations without access to essential services like 9-1-1 and 2-1-1, putting lives at risk.

(more)

We urge the CPUC to reject AT&T's Application for relief, as its approval could jeopardize the safety and well-being of our community. Additionally, we call on AT&T to recognize the significant repercussions of its proposed actions, especially considering our shared experiences during the devastating fires of 2017 and 2020.

Safeguarding access to reliable communication services, particularly for those most vulnerable rural residents, is essential for the resilience and safety of our community. We urge the CPUC to prioritize the interests and safety of Napa County residents and reject AT&T's application.

Thank you for your attention to this matter.

Sincerely,



Joelle Gallagher
District 1



Ryan Gregory
District 2



Anne Cottrell
District 3



Alfredo Pedroza
District 4



Belia Ramos
District 5

Cc: Rep. Mike Thompson
Senator Bill Dodd
Assemblymember Cecilia Aguiar-Curry
California State Association of Counties (CSAC)
Rural County Representatives of California
Mayor Leon Garcia, City of American Canyon
Mayor Scott Sedgley, City of Napa
Mayor Margie Mohler, Town of Yountville
Mayor Paul Dohring, City of St. Helena
Mayor Donald Williams, City of Calistoga
Napa County Farm Bureau
Napa Valley Vintners
Napa Valley Grapegrowers
Winegrowers of Napa County
Napa Communities Firewise Foundation
Napa Valley Community Organizations Active in Disaster (COAD)
Up Valley Family Centers
Ryan Alsop, CEO, Napa County