

BOARD OF SUPERVISORS

SUPERVISORS

Phillip Peters District 1
Zack Scrivner District 2
Jeff Flores District 3
David Couch District 4
Leticia Perez District 5



KATHLEEN KRAUSE
Clerk of the Board of Supervisors
Kern County Administrative Center
1115 Truxtun Avenue, 5th Floor
Bakersfield, CA 93301
Telephone (661) 868-3585
TTY Relay (800) 735-2929

February 13, 2024

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

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

Dear President Reynolds,

On behalf of the Kern County Board of Supervisors, I am writing to request that the CPUC reject AT&T's application for relief of COLR obligations.

AT&T is a "Carrier of Last Resort" and required to 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 does not extend to new technologies that provide similar service, such as wireline VoIP. According to the CPUC's Universal Service rules, carriers (such as AT&T) may opt out of their COLR when another COLR is providing 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 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 approved by the CPUC, AT&T could cancel service to its POTS customers as early as six months.

The localities in Kern that would be impacted by AT&T's requested action is extensive. Our list of communities includes the following:

Arvin city and surrounding areas
Bakersfield Country Club and surrounding areas
Bakersfield city and surrounding areas
Bear Valley Springs and surrounding areas
Benton Park and surrounding areas
California City and surrounding areas
Casa Loma and surrounding areas
Cherokee Strip and surrounding areas
Choctaw Valley and surrounding areas
Cottonwood and surrounding areas
Delano city and surrounding areas
Di Giorgio and surrounding areas

East Bakersfield and surrounding areas
East Niles and surrounding areas
Edison and surrounding areas
Edmundson Acres and surrounding areas
Edwards AFB and surrounding areas
El Adobe and surrounding areas
Fairfax and surrounding areas
Frazier Park and surrounding areas
Fuller Acres and surrounding areas
Golden Hills and surrounding areas
Goodmanville and surrounding areas
Greenacres and surrounding areas
Greenfield and surrounding areas
Hillcrest and surrounding areas
Keene and surrounding areas
La Cresta and surrounding areas
Lake of the Woods and surrounding areas
Lakeside and surrounding areas
Lamont and surrounding areas
Lebec and surrounding areas
Mettler and surrounding areas
Mexican Colony and surrounding areas
Mojave and surrounding areas
Mountain Meadows and surrounding areas
Oildale and surrounding areas
Old River and surrounding areas
Old Stine and surrounding areas
Olde Stockdale and surrounding areas
Pine Mountain Club and surrounding areas
Potomac Park and surrounding areas
Pumpkin Center and surrounding areas
Rexland Acres and surrounding areas
Rivergrove and surrounding areas
Rosamond and surrounding areas
Rosedale and surrounding areas
Shafter city surrounding areas
Smith Corner and surrounding areas
Stallion Springs and surrounding areas
Stebbins and surrounding areas
Tarina and surrounding areas
Tehachapi city and surrounding areas
Wasco city and surrounding areas
Weedpatch and surrounding areas

Many of our rural customers have few market options when choosing quality, affordable telecommunications services to suit their unique needs. 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 service, including the ability to receive alerts and notifications. POTS is the most reliable communications tool in

the safety net arsenal. COLR relief should not be granted without securing widespread alternatives with uniform, technologically neutral minimum service quality standards of POTS alternatives.

Kern County supports equitable access and quality services for our rural communities. Much of rural Kern is underserved and lacks universal access to reliable, secure and open networks. For these reasons we respectfully ask the CPUC to reject AT&T's application.

Sincerely,



David Couch, Chairman
Kern County Board of Supervisors

cc: Honorable Members, CPUC
Honorable Members, Kern Legislative Delegation
California State Association of Counties
Rural County Representatives of California
Kern County Fire Department
Kern County Sheriff's Office
City of Arvin
City of Bakersfield
California City
City of Delano
City of Shafter
City of Tehachapi
City of Wasco
Shaw Yoder Antwih Schmelzer & Lange