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May 23, 2024

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

RE: Judge Glegola's Proposed Decision to Dismiss AT&T California's Application, Relief of Carrier of Last Resort Obligations – Application (A.) 23-03-003 – SUPPORT

Dear President Reynolds and Commissioners,

I am writing on behalf of the Kern County Board of Supervisors to express our strong support for Administrative Law Judge (ALJ) Glegola's Proposed Decision to dismiss AT&T California's (AT&T's) application for relief from their Carrier of Last Resort (COLR) obligations, submitted in Application (A.) 23-03-003 on May 10, 2024.

Maintaining the COLR obligations is crucial for ensuring access to reliable and affordable telecommunications services. Withdrawal of AT&T landlines poses several concerns that will disproportionately affect senior citizens, low-income households, and residents in rural areas.

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. AT&T's Application requests COLR relief for over 99% of their service territory and also requests expedited approval for future COLR relief through a CPUC Tier 1 Advice Letter process.¹ If approved by the CPUC, AT&T could cancel service to its POTS customers within six months, affecting over 580,000 customers.

COLR obligations play a pivotal role in safeguarding the rights and safety of consumers, particularly those in rural and underserved areas. By designating a carrier to serve as the last resort, it ensures

¹ *Id.*, at p. 38.

that all residents have access to essential communication services, regardless of their geographic location or economic status. Rural counties like Kern frequently face natural disasters such as earthquakes, fires, and flooding. In these times of emergencies, landlines become the most dependable form of communication. While wireless connection is unreliable and cell phones can run out of battery, copper landlines have stronger receptions during power outages. This is especially important in rural areas where other forms of connectivity may not be available. Approving AT&T's application for relief—beyond disrupting day-to-day lives—may negatively impact residents' ability to receive emergency alerts or call 9-1-1. Furthermore, for some of the most vulnerable residents, especially those in more geographically remote and rural areas without cell phone reception, approval of AT&T's application would result in them paying more for telephone service, receiving lower quality service, being required to purchase phone service as part of an expensive "bundle", or receiving no phone service at all.

No other COLR serves AT&T's service territory. No potential COLR applied to replace AT&T. Given that AT&T's Application, as amended, does not meet the requirements of the CPUC's COLR withdrawal rules, and the existing undisputed facts of this case make that clear, AT&T's Application should be dismissed.

AT&T has long been a major player in our state's telecommunications industry, and with that role comes a responsibility to serve the public interest. Granting relief from COLR obligations could result in a significant decline in service quality and availability for residents who are already at a disadvantage due to their location. Dismissing AT&T's application for request from relief would prioritize the interests of consumers. It is essential to uphold these obligations to ensure that all Californians, regardless of where they live, continue to have access to reliable and affordable telecommunication services.

For these reasons, the Kern County Board of Supervisors respectfully asks the CPUC to accept ALJ Glegola's Proposed Decision to dismiss AT&T's application (A.23-03-003).

Sincerely,



David Couch, Chairman
Kern County Board of Supervisors

cc: Service List in A.23-03-003
Honorable Members, CPUC Commission
Honorable Members, Kern Legislative Delegation
California State Association of Counties
Shaw Yoder Antwih Schmelzer & Lange