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February 29, 2024

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

Re: AT&T application regarding Carrier of Last Resort Obligations (A.23-03-003)

Dear President Reynolds and Commissioners,

I write to express my grave concerns regarding AT&T's application to relinquish its Carrier of Last Resort (COLR) obligations, particularly in regions designated as CalFIRE Tier 2 and 3 High Fire-Threat zones. My district encompasses many rural San Mateo County Coastside communities, including Pacifica, Half Moon Bay, La Honda, Pescadero, Loma Mar, El Granada, Montara, Moss Beach, and San Gregorio. I also represent portions of San Mateo and Santa Clara Counties on the Bay side of the mountains that are also Tier 2 and 3 High Fire-Threat Zones.

The COLR obligation is designed to ensure that everyone in California has access to safe, reliable, and affordable telephone service. This application, if approved, potentially endangers the safety, health, and well-being of many of my constituents by potentially limiting access to their most reliable communication lifeline—landline services.

During frequent power outages landlines remain the sole means of communication for emergency services, medical consultations, and disaster management efforts. The San Mateo County Coast is currently fighting its exclusion from Phase 1 of the California Middle-Mile Broadband Initiative (MMBI), underscoring the vulnerability of coastsiders' access to emergency communications during extreme weather events. The unreliable infrastructure on the coast puts many underserved communities at risk of losing life-saving communications during these emergencies.

Furthermore, the CPUC's scheduling of public hearings on this matter in locations far removed from so many impacted customers disenfranchises my constituents, depriving them of the opportunity to voice their concerns in person. Both the CPUC and AT&T must demonstrate that another provider can provide universal support in the areas where AT&T wishes to surrender its COLR designation if the CPUC plans to approve the application. I also urge the CPUC to consider potential increased costs to customers already experiencing rising utility bills.

The CPUC's decision on this matter will have far-reaching implications for the safety and security of Californians living in high-risk areas. I urge the Commission to consider the critical importance of maintaining a robust and reliable communication infrastructure, especially in light of our recent experiences with natural disasters.

The sudden and unexpected announcement of AT&T's application has created severe anxiety and fear among many of my constituents. I have included a small sampling of the constituent feedback I have received on this matter to provide you a firsthand understanding of my constituents' concerns:

*"ATT is planning to cut Landline service and maintenance in my area on the northern San Mateo County Coast, just south of Pacifica and 8 miles north of Half Moon Bay. If it gets away with this plan we will not be able to call 911 as cell phone/wifi is unreliable in a lot of cases and definitely not available in storm times (to wit the most recent atmospheric river of 2/4 & 5 2024.)"*

*"Landlines are needed for emergencies. Look no further than the Maui fires and reports that residents could not be reached to warn about the fires because the cell towers burned down. We've always been told that an earthquake can topple cell towers as well. 911 calls are more accurate with a landline for location. Those points are in addition to the spotty cell coverage, not only in rural areas but here on the Peninsula. Power outages affect coverage as well for reasons I don't understand and long outages leave you without use of a cell phone unless you have those expensive battery chargers. Finally, there's affordability factors. Landlines are not as expensive and there are requirements for low income. Cell phones lose battery strength after 2 years. Many cannot afford to keep changing phones or buying the battery charges to use in power outages."*

*"AT&T has announced they want to eliminate traditional landline phone service in California. That is a big mistake. Landlines often provide the only available communication in a wide variety of security and safety situations, from elevators to interior spaces of all sorts where cell service simply doesn't work. Many disabled and other persons have crucial equipment that depends on landlines. Often they are not tech-savvy and do not have friends or relatives to help them through forced technology changes. And many areas have no cable, no fiber, and no wireless service. AT&T doesn't want to upgrade services, they just want to abandon customers most in need. Can the state do anything about this? I thought there was a state rule (law?) preventing AT&T from abandoning traditional landline phone service. Thanks."*

*"I have a traditional copper landline phone because it is the only phone that works in an emergency. IP based phones don't. Cell phones don't. But traditional copper landline phones do because they get their power from the phone company central office. It is important that AT&T not be allowed to shut down landline phone service. It is very important for seniors like me, companies that depend on landline services for alarms, etc."*

The potential removal of this obligation in high-risk fire areas not only poses a severe risk to public safety but also disregards the essential needs of our most vulnerable populations, including those with medical conditions reliant on electricity. I believe no resident of California should be left behind when it comes to safety and connectivity, which landlines still provide for so many in my district and in our state. I hope these points are taken into consideration as the CPUC considers the AT&T application.

Sincerely,



Marc Berman  
Assemblymember, 23<sup>rd</sup> District