



# County of Monterey

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March 12, 2024

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

### **RE: County of Monterey Opposition to AT&T Application 23-03-002 & 23-03-003**

Dear CPUC Commission:

I am writing on behalf of the County of Monterey to strongly urge the CPUC to deny AT&T's application seeking relief from its designation as a Carrier of Last Resort (COLR) and as an Eligible Telecommunications Carrier (ETC).

AT&T is a COLR and required to provide "Plain Old Telephone Service" (POTS), also known as 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 Voice Over Internet Protocol (VoIP).

AT&T's designation as a COLR signifies its crucial role in providing essential telecommunications services, especially in areas where no other provider is available. As an ETC, AT&T is obligated to offer affordable and accessible communication services to underserved communities, ensuring universal access to telecommunications. These designations impose responsibilities on AT&T to maintain reliable communication infrastructure and provide emergency services to residents, particularly in rural and remote regions. AT&T's compliance with COLR and ETC obligations is essential for preserving equitable access to telecommunications services for all members of the community.

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.

Rural customers have fewer market options to choose from for quality and affordable telecommunications services to suit the unique needs of communities. 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. This includes the ability to receive alerts and notifications. POTS is the most reliable communications tool in the safety net resources.

Alternative technologies identified by AT&T to potentially serve customers do not have commensurate regulatory treatment or consumer protections. For example, AT&T's request does not consider whether the customers affected reside in a high fire threat district and can reliably and continuously access alternative services, such as cell phones or VoIP.



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The County of Monterey supports equity-based services for our communities. Much of the rural community is still underrepresented and underserved lacking universal access to reliable, secure, and open networks. While AT&T will be able to pre-position its resources to withdraw its wireline infrastructure, customers will not be similarly situated to find a suitable alternative service to transition their households and/or businesses. This is especially true of our elderly, vulnerable, low income and/or disadvantaged populations. Moreover, if a replacement provider decides to no longer provide service or maintenance in the future, communities may have zero telecommunications options. It is essential for customers to retain, at their option, resilient communications service such as POTS. COLR relief should not be granted without securing widespread alternatives with uniform, technologically neutral minimum service quality standards of POTS alternatives at a reasonable cost.

Finally, the County of Monterey is committed to providing services to our citizens in vulnerable communities who rely on POTS lines. AT&T hasn't even met current obligations to provide universal access to reliable, secure, and open networks.

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

Sincerely,

**DRAFT**

**Glenn Church, Chair**  
Board of Supervisors

cc: California State Association of Counties (CSAC)  
Rural County Representatives of California (RCRC)