PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 27, 2016

Mr. Frank Bell, Community Manager
The Sea Ranch Association
975 Annapolis Road, PO Box 16
The Sea Ranch, CA 95497

Subject: California Advanced Services Fund (CASF) – Proposed Sea Ranch Fiber Broadband Project

Dear Mr. Bell:

Thank you for your February 25, 2015 grant application for CASF infrastructure funding for fiber-to-the-home in The Sea Ranch (TSR) community located in Sonoma County, California. As you are aware, subsequent to your application CalNeva informed Communications Division (CD) staff of its pre-existing cable infrastructure and broadband offering in the TSR area. CD staff requested CalNeva conduct its own tests using CalSPEED to validate CalNeva's service area. The test results demonstrated that CalNeva's infrastructure can offer service of at least 6 Megabits per second (mbps) download and 1.5 mbps upload. CD staff communicated this information to you. In response to your assertion that the project area is not adequately served, staff provided instructions for TSR to conduct its own tests, the results of which staff could use to assess its eligibility finding. We received your test results on October 28, 2015. CD staff conducted its evaluation which included:

(1) Validating CalNeva's service via CalSPEED test results in nineteen representative locations throughout the TSR project area;
(2) Providing TSR with instructions including testing at sites where CalNeva customers subscribe to plans of at least 6/1.5 mbps; and
(3) Evaluating TSR's data in conjunction with the instructions and CalNeva's results.

CD staff found that TSR conducted CalSPEED tests at ten unique sites (multiple tests per site) that correspond to the CalNeva subscriber locations where customers subscribe to at least 6/1.5 mbps service.[1] TSR's CalSPEED tests demonstrate that CalNeva can deliver served speeds. At two site locations,[2] test results are consistently below the CASF download threshold of 6 mbps. Given that the download results were close to the threshold, CD believes that this could be due to inside wiring, modem, or outside plant/network issues. These issues, however, should be resolved directly with the provider, rather than constituting CASF grant program funds to build new infrastructure in the TSR area.

---

[1] Other TSR test sites subscribing to less than 6/1.5 mbps do not comport with testing instructions of September 4, 2015, and are excluded.

[2] The locations are Site #6, ████████ ██ where downloads ranged from 5.17-5.86 mbps, and Site #9, ████████ where downloads ranged from 4.94-5.46 mbps.

With regard to the service quality metrics for the TSR tests, both latency[3] and MOS[4] results were almost all within the acceptable range. CD understands that TSR's decision to construct and operate its own last mile fiber Internet service is based on TSR's position that CalNeva's service quality and speeds are unreliable. However, CD staff relies on the CalSPEED service quality results which showed that CalNeva can deliver served speeds in the proposed project area.

Based on our evaluation, CD staff finds that CalNeva serves the proposed project area, and therefore TSR is ineligible for CASF funding. The CASF program does not allow grants to fund over-build projects where broadband infrastructure capabilities at served speeds already exist. Please contact Michele King at (415)703-4332 or Selena Huang at (415) 703-5247 if you have any questions or would like to share additional information.

Sincerely,

Robert Wullenjohn
Program Manager, Broadband Policy Analysis Branch
Communications Division

Cc: Lynn Bailey, TSRA Clerk & Recorder/Grant Committee Lead
        Ryan Dulin, Director of CD
        Selena Huang, CASF Supervisor
        Michele King, CASF Analyst

---

[3] Latency (Delay): a measure of how long it takes data packets to travel across the network; under 100 milliseconds is considered acceptable.
[4] Mean Opinion Score (MOS): a calculation of over-the-top streaming voice quality ranging from 1-5, where a score of 4 or greater is considered acceptable. MOS is an indicator of service quality, stability and reliability.