



AGENCY: City Council
MEETING DATE: Mar. 11, 2024
DEPARTMENT: Information Technology
PRESENTED BY: D. Smith
EMAIL ADDRESS: dsmith@fortbragg.com

AGENDA ITEM SUMMARY

TITLE:

Approve City Council Letters in Opposition to AT&T CPUC Applications A.23-03-002 and A.23-03-003

BACKGROUND:

AT&T has applied to the California Public Utilities Commission (CPUC) to be relieved of its Carrier of Last Resort (COLR) obligations in most of California (including what appears to be all of Mendocino County), and also to be allowed to give up its designation as an Eligible Telecommunications Carrier (ETC).

If these applications are allowed, then it is almost 100% certain that there would be *no landline telephone service available here* (and no related telecommunications financial assistance for qualifying residents).

To read more about the applications, see this link to the CPUC's related web page:

<https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/att-colr-etc-proceedings>

ALTERNATIVES TO LANDLINE SERVICES:

Telecommunication alternatives to copper landlines being suggested for use in most rural areas are limited to cellular (land and soon-to-be space-based "towers") and Voice-over-Satellite-Internet ("satellite" for the rest of this document).

Fiber-to-the-Premise is merely a far-off dream for most rural areas outside city limits.

BOTH CELLULAR AND SATELLITE ARE A 'NO-GO' ALTERNATIVE FOR MANY OF OUR LOCAL AREAS:

1. At many locations, neither are available or suitable (due to terrain and trees).
2. Both are almost always more expensive than landline service, especially when considering that discounts are available for landline service based on eligible income levels (e.g., \$45,900 annually for a family of 4).
3. Both are NON-RELIABLE as alternates during many emergency situations, due to both power availability and call routing issues.

POWER IS THE OTHER IMPORTANT ISSUE IMPACTING CELLULAR AND SATELLITE AS ALTERNATIVES:

Landlines provided by AT&T are powered from their Central Offices (such as the one in Fort Bragg), and those facilities are backed up by batteries and large generators with significant fuel stores. This is why, even when power is out across our entire coastal area, the landline phones still work – they are powered by the AT&T Central Office equipment.

AGENDA ITEM NO. _____

During emergencies that affect electrical power availability, both cellular and satellite services will work for only a limited time, or more probably not at all (with few exceptions).

- Cellular Service:
 - o Cellular towers have brief backup power at the tower locations. There may be battery only backup, or battery and generator backup that depends on frequent re-fueling (which may or may not be available during an emergency).
 - o During a power outage, personal cellular phones will not be rechargeable at home except by those who have backup power available.
 - o Even for situations where community members can come to a central location provided by emergency workers to change their phones, this option does not help those with conditions or situations precluding them from reaching the special location(s).

- Satellite Service:
 - o The on-premise equipment needed for satellite phone / internet must be powered by that location. This will not be an option except for those who have backup power available. The higher cost of satellite services also makes it out of reach for many current landline customers.

LANDLINE AVAILABILITY IS IMPORTANT FOR SAVING AND SUPPORTING LIVES:

Children as young as 4 years of age have saved the lives of adults by knowing how to pick up a landline phone and call for help. Should a family live in an area with no cell coverage, a landline is crucial.

There are long, well-established assistive devices for persons living with less-than-full sight, mobility, etc. capabilities to use landline phones – these resources either do not exist, or are not well-integrated or easy to use for cell phones or satellite communications.

AN IMPORTANT LESSON FROM OUR RECENT HISTORY:

During the incident May 10 – 11, 2022, when all fiber uplinks were accidentally cut through by workers, we still had communication *within* the City and surrounding nearby areas of Mendocino **using landlines**, because our landlines are switched (routed) locally at AT&T's Fort Bragg "Central Office". (Please see Fig. 1 – Current Local Call Routing.)

Cell phones did not work because those calls are routed to cellular towers and then through fiber and to the Bay Area for routing. Those fiber 'uplinks' were cut. (Please see Fig. 2 – Without Local Call Routing.)

Agents of AT&T have informed us that, even within the city limits of Fort Bragg, telephone service over AT&T fiber lines would be routed through equipment in the Bay Area. This means that if we were to put in place AT&T fiber today and route our telephone calls over it, calls being placed from and to locations within the Fort Bragg city limits would have to 'flow' to the Bay Area and back. If those fiber lines were destroyed (either through

disasters such as an earthquake or through accidents such as already happened in May, 2022), we could not make local calls even within the city itself.

THE BOTTOM LINE:

If AT&T's applications are approved, many people living in rural areas throughout California will be *required* to live in communication conditions not from the *last* century...but from the one before.

Lives may be lost which could have been saved simply with the ability to call an ambulance, fire or police for help using a *landline* phone where the call is *locally routed* to nearby emergency responders.

RECOMMENDATIONS:

We recommend that the City Council request that the CPUC deny AT&T's applications 23-03-002 and 23-03-003 everywhere, but especially in the rural areas of California, as there are presently no affordable alternatives to all of the communication essentials necessary in emergencies and for the needs of everyday life.

If despite opposition the CPUC intends to approve AT&T's applications, we recommend that, *as a condition of approval*, the CPUC require (1) that Fiber-to-the-Premise be implemented *first* for all customer premises in any area where landlines will no longer be supported, and (2) that there be an absolute requirement that local calls can continue to be switched / routed *locally* (rather than being routed "over the hill" and back again). (Please see Fig. 3 – Solution for Call Routing.)

RECOMMENDED ACTION:

Approve City Council Letters to California Public Utilities Commission, State Senator Mike McGuire, and State Representative Jim Wood in opposition to AT&T Applications A.23-03-002 and A.23-03-003.

ATTACHMENTS:

- 1 – This Document
- 2 – Fig. 1 - Current Local Call Routing
- 3 – Fig. 2 - Without Local Call Routing
- 4 – Fig. 3 - Solution for Call Routing
- 5 – Letter to CPUC
- 6 – Letter to Senator Mike McGuire
- 7 – Letter to Representative Jim Wood