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March 5, 2024

California Public Utilities Commission Public Advisor's Office  
505 Van Ness Avenue  
San Francisco, CA. 94102

Subject: Application 22-03-002 and Application 22-03-003

To Whom it May Concern:

Please consider this letter a protest to the above applications, and a request from the County of Plumas that you deny both of these applications by AT&T California.

No doubt you have heard many concerns from rural California, and the AT&T service area of Plumas County is some of the most rural in the state. Over the past few decades, AT&T's business model has been extremely detrimental to the safety of all in Plumas County, whether it be to residents or visitors to the county.

AT&T deployed U-verse platform telephone service by offering it as a reduced rate option for copper-based lines. In doing so, they neglected to explain its inability to work during times of power outages, something that happens frequently due to our weather and geographic demographics. Many customers changed, and they had to fight hard to get their copper service restored once they experienced telephone service loss during power outages.

Due to our geographic and rural demographic setting, cellular service is quite limited even within our townsites, and when available, it too is supported mostly by extenders within residential U-verse systems. And it too is fraught with reliability issues due to weather and other emergency situations.

Plumas County elevations range from 2,024 to 6,640 feet, with heavy snow and winter conditions a common occurrence here. That winter weather brings with it power outages that kill non-copper-based phone systems. In the peak of our summer fire season, public safety power shutoffs (PSPS) occur when our local communities are at their biggest risk of wildfire, and then too, non-copper-based phone systems fail. As well, a number of Plumas County fire agency dispatch services rely on copper-based phones in order to have consistent communication dispatch abilities.

In addition, AT&T has made public telephones an endangered species and we can only identify two in Plumas County. In the past they were a presence in every Plumas County community. Anyone traveling needs to try and find a U-verse based hot spot or try and find an open business during an emergency. During times of power outages, they are without any option of communication.

In its applications, AT&T notes there are nine wire centers with only one *'alternative'* to AT&T services (and three of those wire centers are in neighboring Sierra County). They also note these nine wire centers *only* support 110 lifeline customers, and .02% of their customers are system wide. Their statement infers that the customers in

these nine wire centers are not worth worrying about due to their limited numbers. We find those statements demeaning.

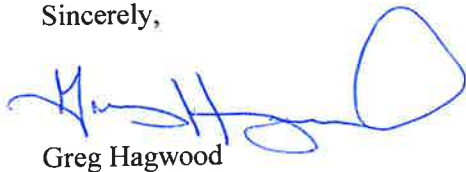
The one '*alternative*' they offer is a company located in the state of Wyoming and for which this board has no institutional history. Should a company like AT&T as a regulated utility wish to do business in California, they should not be allowed to operate in areas with a larger profit margin while trying to escape their mandated operations in less lucrative areas.

While Plumas County is home to nearly 19,000 residents, its landmass is comprised of 75% national forest system lands with visitors year around that far exceed our permanent population.

In 1936, the Rural Electrification Act was passed by congress in order to close the gap and bring reliable electrical power to farms and other rural areas. When adopted, 3% of farms had commercial electrical power, and by 1956 some 90% of those farms were so served.

Sadly, the gap between urban and rural areas on the subject of both cellular and broadband service remains huge. Instead of allowing AT&T to make the situation worse in their rural California service area, please deny these applications and instead encourage, or better yet, mandate them to enhance the services in these areas to what they once were and to what urban areas have today.

Sincerely,



Greg Hagwood

Plumas County Chair on behalf of the Board of Supervisors