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February 16, 2024

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

## Re: AT&T Application Relief of Carrier of Last Resort Obligation - OPPOSE

Dear CPUC Commission,

On behalf of the Marin County Board of Supervisors, I write to join the growing chorus of concerned counties who request that the California Public Utilities Commission (CPUC) reject AT&T's application for targeted relief from its Carrier of Last Resort (COLR) legal obligations.

As the Carrier of Last Resort, AT&T must provide Plain Old Telephone Service (POTS) or landline phone service upon request to all residential and business customers within its service territory. AT&T is requesting that the CPUC relieve it of this obligation and allow it instead to decide whether to provide telephone service, even if no other telephone provider in the area is obligated to provide service.

For some of our County's most vulnerable residents, especially those in more geographically remote and rural areas without cell phone reception, approval of AT&T's application would result in them paying more for telephone service, receiving lower quality service, being required to purchase phone service as part of an expensive "bundle," or receiving no phone service at all.

AT&T's application requests COLR relief in providing landline service for over 99% of its service territory where it determines an alternative voice provider exists (VoIP, wireless, etc.) and does not request a replacement COLR. Since the definition of "alternative voice provider exists" is based on demonstration that a carrier's footprint covers only 50% of the census block, residents in the remaining 50% are in danger of having no phone service. Additionally, AT&T's application describes the COLR requirement as an "underutilized landline telephone network," however, in households with limited cell phone coverage, landlines are far from underutilized. Landlines provide essential communications, especially in emergencies, to households without cell coverage and/or other connectivity options.

AT&T's application also requests expedited approval for future COLR relief through a CPUC Tier 1 Advice Letter process that does not require CPUC approval. If the CPUC approves, AT&T could cancel service for its POTS customers in as little as six months.

Over 580,000 AT&T customers would be affected – including 28,800 households in Marin County – many of whom are senior citizens, live in low-income households, or reside in rural areas where other connectivity is not available to them, placing their lives in jeopardy in the event of an emergency. This includes:

- Approximately 630 households in west Marin who have no other option if the AT&T application is approved, and
- Approximately 23,000 residents in suburban and urban areas that currently subscribe to AT&T's plain landline service and may have to select a different carrier and/or pay more if the application is approved.

Marin County opposes this AT&T application, as it will reduce access to essential communications services for our communities while increasing costs for those still covered. Much of rural Marin County is already under- or un-served, lacking universal access to reliable, secure, and open networks. This application does not address these inequities, but rather increases them.

Sincerely,



Dennis Rodoni, President  
Marin County Board of Supervisors

Cc: Marin County Board of Supervisors  
Senator Mike McGuire  
Assemblymember Damon Connolly