

**From:** Melissa Slawson  
**To:** [CA Broadband Council](#)  
**Subject:** Comments of GeoLinks on the Preliminary Draft of the California Broadband for All Action Plan  
**Date:** Tuesday, November 17, 2020 4:52:36 PM  
**Attachments:** Comments of GeoLinks on the State Broadband Action Plan 11.17.20.pdf

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Dear California Broadband Council,

California Internet, L.P. dba GeoLinks hereby submits these comments on the Preliminary Draft of the California Broadband for All Action Plan. Please do not hesitate to reach out if you have any questions.

Thank you.

Regards,

**Melissa Slawson**

*General Counsel and Vice President of Government Affairs and Education*

**GeoLinks**

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November 17, 2020

Stephanie Tom  
Deputy Director, Broadband and Digital Literacy  
California Department of Technology  
CABroadbandCouncil@state.ca.gov

VIA EMAIL

Re: Comments of California Internet, L.P. dba GeoLinks on the California Broadband for All Action Plan

Dear Ms. Tom,

California Internet L.P. dba GeoLinks (“GeoLinks” or the “Company”) hereby submits these brief comments on the Preliminary Draft of the California Broadband for All Action Plan, updated per the October 23, 2020 Broadband Council Meeting (“Draft Plan”). GeoLinks is one of the fastest growing Internet and phone providers in America and the #1 fastest growing fixed wireless service provider in California.<sup>1</sup> GeoLinks applauds the California Broadband Council’s efforts to implement the Governor’s Executive Order N-73-20 and promote broadband deployment in California and appreciates the opportunity to submit these comments. Generally, GeoLinks believes that the Council’s Draft Plan draws reasonable conclusions regarding the status of broadband availability in California and steps that need to be taken to improve both deployment and adoption. However, GeoLinks offers these comments on a few matters that the Company believes warrant further review in order to ensure the Council can reach its stated goals.

### **Addressing Insufficient Service Standards by Raising Broadband Minimums to 25/3 Mbps**

In the Draft Plan, the Council addresses how California’s current speed standards are insufficient for how households and businesses use the internet in daily life. While GeoLinks understands from the notes in the Draft Plan that the Council is waiting for additional information on actual data usage and feedback from schools and health systems in order to develop a recommendation, the Company urges the Council to adopt as its recommendation the current federal standard of 25/3 Mbps. 6/1 Mbps connections are not sufficient to support how people use the internet today. Specifically, this standard does not accommodate the increased need for teleworking and remote schooling that may become the new normal for many Californians. However, a 25/3 Mbps standard would ensure connections that support applications needed for these activities such as video conferencing applications. In addition, because the 25/3 Mbps standard is the same standard used by the FCC, using this standard will make mapping and service level

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<sup>1</sup> Inc. Magazine’s 38th Annual List of America’s Fastest-Growing Private Companies—the Inc. 5000 (<https://www.inc.com/inc5000/2020>)

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comparisons easier to track and will make grant funding easier to distribute/ harmonize with federal programs. For these reasons, GeoLinks urges the Council to recommend a 25/3 Mbps service minimum throughout California.

### **Reconsidering Broadband Standards by Promoting Hybrid Networks**

In the Draft Plan, the Council considers, among other things, methods for improving Broadband access in both rural and urban areas, broadband reliability, California's current investment approach and funding, and California's current statewide broadband approach. While GeoLinks applauds the Council's deep dive into the issues that affect broadband deployment and adoption in California, GeoLinks notes that the Council's Draft Plan appears to suggest that the path forward is a very limited, fiber-centric approach to broadband deployment. GeoLinks asserts that the best path forward is not fiber-only, but instead that the Council should consider a hybrid network strategy.

In the Draft Plan the Council refers to fiber as "future-proof deployment" while seemingly lumping all other technology options into the category of "shorter-term alternatives."<sup>2</sup> While GeoLinks believes the Council plans to make adjustments to the Draft Plan to address the role of technologies other than fiber, we emphasize that "future-proof" does not need to mean "fiber-only." In order to reach the Draft Plan's stated goal of ensuring that all Californians have access to high-speed internet GeoLinks asserts that the Council must consider a variety of technological options. Failure to do so will lead to deployment lag and unnecessary spending of limited state funds, neither of which serves the public interest.

GeoLinks acknowledges that fiber network elements are necessary to ensure ubiquitous broadband deployment. At some point in the network, all technologies need to interconnect to a fiber headend. However, GeoLinks cautions against assuming that the need for some fiber translates to a need for all fiber. The fiber-centric approach set forth in the Draft Plan ignores the important role that non-fiber providers play. As an initial matter, service providers utilizing non-fiber technologies, such as fixed wireless service providers, are currently offering broadband services that compete head to head with fiber providers. GeoLinks is currently offering Gigabit and Gigabit+ connections to customers throughout California with plans to expand its network to reach many rural areas of the state. In addition, the Company is actively working with equipment manufacturers to develop new technology that will deliver higher throughputs on a large-scale basis. Further, non-fiber technologies are offering reliable network capacity for critical services. During the November 4, 2020 Council Action Plan Working Session, there was discussion around how microwave connections are being used to provide redundancy and additional capacity to 911 systems in California. Clearly non-fiber technologies play an important role when it comes to deployment and reliability.

Second, non-fiber services are not necessarily "short-term" as the Draft Plan appears to state. GeoLinks specifically engineers its fixed wireless connections to be permanent connections.

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<sup>2</sup> See Broadband Action Plan Outline Updated per October 23, 2020 Broadband Council Meeting at pg. 8.

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Through diligent engineering practices GeoLinks is able to ensure that its network builds are scalable, reliable, redundant, and, indeed, future proof. Moreover, the Federal Communications Commission (“FCC”) has recognized the important role that non-fiber technologies play in broadband deployment by allowing non-fiber service providers, including fixed wireless providers, to participate in the recent Connect America Fund Phase II Auction and the Rural Digital Opportunity Fund Auction, which is currently underway. In both instances, the FCC is willing to commit 10 years of support to qualified Auction winners for broadband deployment regardless of the technology used. Clearly, the FCC does not view these non-fiber options as “short-term” and neither should the Council.

Third, an all-fiber approach ignores the cost-saving realities of hybrid network deployment. Finite broadband deployment resources stretch further when hybrid network approaches are utilized. This means that more areas can be connected with the same number of dollars. By way of example, GeoLinks recently took on a project to connect a school in rural California where a fiber solution to the school (from existing fiber infrastructure 19 miles away) was quoted at more than \$24 million. However, using fixed wireless technology, GeoLinks was able to provide the school with a high-quality, scalable connection for approximately \$340,000 – less than 2% the cost of an all-fiber connection.

Lastly, an all fiber approach does not take into account the need for rapid broadband deployment. As we’ve learned from our experience with the COVID pandemic, Californians need access to high speed internet service now. It is no mystery that fiber is incredibly time consuming to deploy. Between permitting, trenching, laying miles upon miles of fiber, etc., fiber projects can take years to complete. This is especially true in rural and far reaching areas. Relying on a fiber-only network approach to solve California’s connectivity issues will result in long delays in deployment, leaving areas that currently lack fiber access waiting years for connectivity. However, other technologies can often be deployed more rapidly than fiber. Alternative technologies can offer comparable connectivity that can be deployed in a fraction of the time. Especially for rural areas, this rapid deployment could be a game changer for consumers.

For these reasons, GeoLinks urges the Council not to limit itself to recommending a fiber-only approach to solving the current broadband deployment and adoption issues facing California and to instead consider taking a technology neutral, hybrid network approach.

[Signature Page Follows]

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November 17, 2020

GeoLinks appreciates the opportunity to submit these comments to the Council. We are standing by to answer any questions or provide any additional information that the Council may find helpful, and otherwise actively and meaningfully participate in the work undertaken by the Council or pursuant to the Governor's Executive Order.

Sincerely,



Melissa Slawson  
General Counsel, V.P. of Government Affairs and  
Education  
California Internet, L.P. dba GeoLinks

Cc:

Honorable Gavin Newsom	Governor
Ben Hueso	Senator
Marybel Batjer	CA PUC President
Mark Ghilarducci	Director, CalOES
Tony Thurmond	Superintendent of Public Instruction
Daniel Kim	Director, Dept. of General Services
David Kim	Secretary of Transportation
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