

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Investigation to Address
Intrastate Rural Call Completion Issues.

I. 14-05-012

**COMMENTS BY THE COUNTY OF MENDOCINO
IN SUPPORT OF THE PROPOSED DECISION
OF COMMISSIONER SANDOVAL**

KATHARINE L. ELLIOTT (Bar # 135253)
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December 5, 2016

Pursuant to Rule 14.3 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, Mendocino County submits these comments in full support of the Nov. 15, 2016 Proposed Decision ("PD") of Commissioner Sandoval.

The PD makes appropriate decisions that respond to the evidence presented at the July 15, 2016 CPUC Public Participation Hearing, held in Ukiah, California, where serious concerns about public safety impacts in relation to phones being unreliable and loss of services due to widespread outages were very strongly expressed by 100% of the speakers. Scheduled to last from 2:30-4:30, but instead lasting well past 6:15 pm on a Friday night, 33 people were able to testify (although at least 4 people had to leave before they were called to speak). Eleven of those speakers were high-ranking Public Safety officials, including the County Sheriff, 2 Police Chiefs, the CalFIRE Mendocino Unit Chief, Head of County OES, Head of the Mendocino County Emergency Medical Services Agencies, Head of the Fort Bragg Hospital IT, and many local Fire Department staff. Senator Mike McGuire and Assembly member Jim Wood spoke, along with a representative from Congressman Huffman's office. Three CWA/lineman reported on facility issues, one of whom included many photos of facilities in need of repair. People traveled long distances and took time off work to attend because this is such a critical issue for rural residents. Several speakers expressed appreciation to Commissioner Sandoval that finally rural voices were being heard and there was recognition of an on-going problem. Many people voiced that AT&T in particular has been unresponsive to our concerns. It is important to note that representatives from AT&T and Frontier, our two major ILECs in the county, did not even attend this CPUC hearing.

Following the July PPH hearing in Ukiah, where many of the speakers testified about dial tone access problems which happen when it rains, residents have continued to have problems around the issue of dial-tone access and 9-1-1 availability - especially since the rains started in early November. We brought evidence of these continuing problems and issues referenced in the Public Participation Hearing¹ to the “All Party Meeting” on November 30th in San Francisco to distribute hard copies to Commissioners and participants, but were told by Commissioner Sandoval that this evidence should instead be submitted with our comments. This evidence is therefore included as “Attachment A” to our comments on the PD.

The evidence presented at the July hearing, and continued evidence included in these comments, justify the PD making even stronger requirements for the Commission to adopt as they show a long-term pattern of service issues that lead to loss of dial-tone and 9-1-1 access. As Mendocino County Supervisor John McCowen stated at the PPH, “...there really is a problem, and it is deserving of a solution.” As another example, Supervisor Hamburg mentioned at the All Party Meeting that to require diversity and redundancy, as opposed to only recommending it as in the PD, should not be a big deal nor a major concern for carriers, since the three major carriers have already stated to the Government Accountability Office that they already “build resilience and reliability into their IP networks as part of business operations and emergency planning.”² However, we are satisfied that in its current state the PD is an important step in the right direction;

¹ Information that was referenced at the July 15th Public Participation Hearing and further elaborated on in Attachment A include the notarized letter from Michelle Dunicliff about AT&T refusing to provide her house with voice service; John Pinches being told his landline was being discontinued and then losing all service for the next decade; and lack of service on trouble tickets during the winter (spreadsheet from Mendocino Community Network); Sheriff Allman spoke at the Hearing and also provided a letter in support of the PD.

² December 2015 GAO Internet Protocol Transition Report; see attached report summary page in Attachment A

the inclusion of a Phase 2 will allow for continued time to address issues with the input of public safety officials, so we fully support the PD as is³. In summary, the evidence supports that Public Safety official's legal responsibility to the public to fulfill their duties are being compromised by issues over which the CPUC has duties and authorities. The evidence also supports a long-term pattern of neglect of landlines upon which many residents rely, and which needs to be addressed immediately. To begin to correct the situation the Commission should adopt the PD without modification at its December 15, 2016 business voting meeting.

Respectfully submitted,

Dated: December 5th, 2016

/s/ Katharine L. Elliott
Katharine L. Elliott
County Counsel
Attorney for the County of Mendocino
501 Low Gap Road, #1030
Ukiah, CA 95482
Telephone: (707) 234-6885
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³ Mendocino County Sheriff Tom Allman, who testified at the PPH, also provided a Letter of Support for the PD and indicated his willingness to participate in such a Working Group

ATTACHMENT A

THOMAS D. ALLMAN
Sheriff-Coroner



Undersheriff Randy Johnson

Captain Gregory L. Van Patten
Field Services
Captain Tim Pearce
Corrections

County of Mendocino

Office Of The Sheriff-Coroner

November 29, 2016

RE: Support for Proposed Decision in Proceeding 14-05-012

Dear Commissioner Sandoval and PUC Commissioners:

Thank you for this opportunity to comment on the Proposed Decision (PD) in the PUC Rural Call Completion Proceeding 14-05-012. I would also like to express my sincere appreciation for Commissioner Sandoval for traveling to Mendocino County in July and staying late on a Friday night to hear the many concerns of rural residents on telecommunication issues. I ended my public testimony that day with a plea to the Commissioner to help us get diverse infrastructure, require outage notification, and to make sure that the landlines are maintained. I am pleased to see that these issues were addressed in the Proposed Decision, and I would like to express my strong support of this decision and hope that the full Commission will support it as well.

As Mendocino County Sheriff, I have a legal duty and serious responsibility to the citizens to maintain public safety, and information is absolutely essential for me to do my job. When I can't communicate with my deputies in the field, I wonder, "Has the phone system gone down or has an incident of some type occurred?" When communication with the jail is out, I ask myself "Is there a riot or should I assume the phone is down? Where should I roll my deputies and what are they walking into?" And if my deputies can't put gas in their cars because a fiber break brings all businesses in the county to a standstill, then we have a very real public safety crisis.

All of the above situations are not hypothetical, all of these situations have occurred. The communications failure escalates to a real emergency, because I am forced to make decisions without the benefit of knowing what is really going on. The 2015 outage resulted in the activation of our OES at a level 2 at a cost of tens of thousands of dollars to our county. And to compound problems, when people can't reach their loved ones, they call the Sheriff's office to get any information they can, and any working lines are quickly swamped when we really need those lines to deal with the crisis.

You state in the proposed decision: "Californians should be able to reach 911 when they make the most important call of their life" and I couldn't agree more. Unfortunately, in Mendocino County residents losing phone service is much more common than we would like, whether due to widespread outages or individual landlines problems. I provided testimony in July 2016 as to some of these events, including the outage of 2014 and 2015. As Sheriff, I have to contend daily with the lack of information about the extent of individual landlines that may be out at any one time, especially during the winter - is it 20, 200 or 500? I currently have no way of knowing. We also have no way of predicting what the future holds, and so we must all be prepared to uphold our public safety responsibilities to the fullest extent possible.

I am grateful to see the needs of rural counties finally being recognized and considered, because it has been far too long that rural voices have been ignored. I ask that you please keep in mind the importance of notification as a key element - never again do I want to be sitting at home on a Sunday evening for six hours before I or my dispatch have any idea that a major telecommunications failure has affected a large part of our county, as what happened in 2014. Those six hours could have meant the difference between life and death for one of Mendocino County citizens. I support and would welcome participation in a Phase 2 Working Group on this issue. I consider AT&T a working partner in these efforts. The important thing is to move forward together so that we can all uphold our legal responsibilities, and I see this Proposed Decision as a way to do that.

In sincere appreciation for your efforts,

A handwritten signature in cursive script that reads "Tom Allman". The signature is written in black ink and is positioned above the typed name and title.

THOMAS ALLMAN
SHERIFF-CORONER
TDA/rb

Ms. Michelle Dunncliff
594 Park Blvd
Ukiah, CA 95482
707-463-1500

November 23, 2016

Dear Commissioners,

Please accept my testimony in this proceeding as to my experience trying to get a landline for my home in Ukiah, CA.

On June 24th, 2016 I call AT&T to get a landline at my home on 594 Park Blvd in Ukiah, Ca. I was told by the AT&T representative that the only way for AT&T to provide a landline for us was if we combined our internet service with the landline. Since I occasionally work from home, and AT&T could not offer me an internet service that was powerful and quick enough for my work, this option was not acceptable to me. I informed them that I only needed the landline. Their reply was, "Sorry, AT&T cannot offer you only a landline."

On the same day I went into our local AT&T store located at 516 E. Perkins Street (Ukiah, 95482) and told them that when I called AT&T I was informed that they could not offer me a home landline. The in-store representative informed me that yes, they could offer me just a landline. He went into the back office, and when he came back again he corrected his statement and said that he was sorry, but AT&T could not offer landlines in the Ukiah area. I went home with a digital home phone, which I was told was my only option in Ukiah.

Thank you for the opportunity to share my story.

A handwritten signature in black ink that reads "Michelle Dunncliff". The signature is written in a cursive, flowing style.

Michelle Dunncliff

See attached Notarization

CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT

CIVIL CODE § 1189

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
County of Mendocino)

On 11/29/2016 before me, Krystina Tollini, Notary Public,
Date Here Insert Name and Title of the Officer

personally appeared Michelle Dunnicliff
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) ~~is/are~~ subscribed to the within instrument and acknowledged to me that ~~he/she/they~~ executed the same in ~~his/her/their~~ authorized capacity(ies), and that by ~~his/her/their~~ signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.



Signature [Handwritten Signature]
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Commissioner Letter Document Date: 11/23/2016
Number of Pages: 1 Signer(s) Other Than Named Above: N/A

Capacity(ies) Claimed by Signer(s)

Signer's Name: Michelle Dunnicliff
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

Signer's Name: _____
 Corporate Officer — Title(s): _____
 Partner — Limited General
 Individual Attorney in Fact
 Trustee Guardian or Conservator
 Other: _____
Signer Is Representing: _____

Mr. John Pinches
Island Mountain Road
PO Box 307
Laytonville, CA 95454
707-671-6215

November 23, 2016

Dear Commissioners of the California Public Utilities Commission,

I would like to provide testimony in the Rural Call Completion proceeding as to how I lost essential communications at my home in Mendocino County for over a decade.

I live on a rural mountainous property which is an operating cattle ranch, with 300 head of cattle. When I bought the property in 1979, almost 40 years ago, there was a reliable landline phone which provided for essential communication. This phone served me well until around 2000, or for around 21 years.

However, around that time (and I don't remember the exact year), I was told by the phone company that as part of a settlement for a PUC-approved rate increase, 14 rural landlines such as mine were being switched over to a wireless microwave service. Although I had no choice in the matter, this was okay with me as long as I had a working phone. This new system had a antenna on top of Iron Peak mountain, and another antenna on a pole at my house. This worked fine for several years, and if there was a problem the local phone technician (who I knew) would fix it. Unfortunately, when he retired I never could find out who replaced him, and from then on I had problems to the point that the phone became completely inoperable. I called Verizon many times but was never able to get the situation corrected. Part of the issue was that the road that went up to Iron Peak where the antenna was located fell into disrepair. But regardless of who was responsible for the road maintenance and antennae, I was still paying for a phone service that I was not receiving. In fact, because this phone was so important to me, I kept paying my bill because I didn't want them to have the excuse that I wasn't paying my bill as the reason to dis-continue my service. But finally, after almost 2 years of paying approximately \$50/month for a completely non-existent service, I gave up and cancelled the service.

Last year I was finally able to receive enough of a signal for a cell phone to work, which is what I currently use. I was over a decade (probably closer to 15 years) without a working phone, and I am just extremely thankful that during those years I did not have any major medical emergencies when I could not call for help. My story is not unique; as a county supervisor for 12 years (retired in 2014), I have heard many similar stories from residents about landlines falling into dis-repair, and people eventually giving up the struggle and canceling their service as I was forced to, or switching if there is any alternative available. This is a pattern that I have seen repeatedly.

Thank you for the opportunity to share my story for this proceeding in the hopes that it may help you understand the real truth of what rural residents experience in regards to their phone services.

I swear that the above testimony is true.

John Pinches



Date Nov 28, 2016



Ruth Valenzuela | District Director

Assemblymember Jim Wood | District 2

200 S. School Street, Ukiah | Phone 707-463-5770 | Fax 707-463-5773

From: Valenzuela, Ruth

Sent: Thursday, November 17, 2016 11:05 AM

To: 'marc.blakeman@att.com'

Cc: Jim Wood; Snow, Liz

Subject: Outage Issues in Mendocino County

Importance: High

Dear Mr. Blakeman,

Assemblymember Wood has been contacted by Mendocino Community Network (MCN) regarding an increase in phone outages in Mendocino County recently. MCN contracts with Sonic so, if I understood Rhuenette correctly, that creates some difficulty in tracing these outages or in getting to the reason for them. I spoke with Rhuenette on Tuesday and I really didn't hang up my phone feeling like I had an answer to my question, nor did Congressman Huffman's staff when they spoke with her.

I have attached a spreadsheet with the outages and the dates. What really concerns me is that we have so many people who have been out a number of days and so many missed commits. This happens over and over. We are told it is due to "the storm" but we haven't had any significant rain.

Can you please give the Assemblymember an update on the current situation and let our office know when sufficient staffing will be available to bring service back to the people affected?

Thank you,



Ruth Valenzuela | District Director

Assemblymember Jim Wood | District 2

200 S. School Street, Ukiah | Phone 707-463-5770 | Fax 707-463-5773

Current Installation Orders that are not Completed				
<u>address</u>	<u>order date</u>	<u>due date</u>	<u>phone number</u>	
45110 Little Lake, Mendocino, CA, 95460	10/21/16	11/9/16	(707) 397-4007	
18550 Shoreview Lane , Fort Bragg, CA 95437	10/25/16	11/10/16	(707) 962-3000	
31833 Airport Rd, Fort Bragg, CA, 95437	10/27/16	11/10/16	(707) 409-6784	
44270 Gordon Lane, Mendocino, CA, 95460	10/28/16	11/4/16	(707) 937-0767	
44451 Surfwood Drive, Mendocino, CA, 95460	10/28/16	11/4/16	(707) 937-1834	
44600 Woodstock Dr, Mendocino, CA, 95460	10/31/16	11/8/16	(707) 397-1670	
1450 E Oak, Fort Bragg, CA, 95437	10/31/16	11/8/16	(707) 734-9064	
10490 Hills Rd, Mendocino, CA, 95460	11/3/16	11/8/16	(707) 397-1810	
10550 Lansing, Mendocino, CA, 95460	11/4/16	11/10/16	(707) 397-1435	
32200 N Harbor Dr, Fort Bragg, CA, 95437	10/27/16	11/10/16	(707) 734-4292	
45021 Little Lake, Mendocino, CA, 95460	11/8/16	11/14/16	(707) 397-1688	
45051 Ukiah, Mendocino, CA, 95460	11/9/16	11/16/16	(707) 397-4021	
Current Repair Orders				
<u>address</u>	<u>phone number</u>	<u>ticket open</u>	<u>ticked comm</u>	<u>status</u>
45156 MAIN, MENDOCINO	7073971812	10/22/16	11/9/16	AT&T Missed Commit
19200 PINE TREE LN, FORT BRAGG	7079647033	10/27/16	11/9/16	AT&T Missed Comm Line condition request required.
32290 RIVERS END RD, FORT BRAGG	7077349030	10/31/16	11/9/16	AT&T Missed Commit
30593 JACOBSEN LN, FORT BRAGG	7079623033	11/1/16	11/9/16	AT&T Missed Commit
11251 LANSING, MENDOCINO	7079372786	11/1/16	11/9/16	AT&T Missed Commit
44691 LARKIN RD,, MENDOCINO	7079371152	11/1/16	11/9/16	AT&T Missed Commit
44570 GORDON LN,, MENDOCINO	7079371744	11/3/16	11/9/16	AT&T Missed Commit
45100 BREST RD,, MENDOCINO	7079373484	11/4/16	11/9/16	AT&T Missed Commit
10501 HILLS RD,, MENDOCINO	7073971599	11/4/16	11/9/16	AT&T Missed Commit
43420 COMPTCHE UKIAH RD,, MENDOCINO	7079375709	11/4/16	11/9/16	AT&T Missed Commit
44801 JACK PETERS CREEK RD, FORT BRAGG	7073974005	11/4/16	11/9/16	AT&T Missed Commit
44270 GORDON LN, MENDOCINO	7079370767	11/4/16	11/9/16	AT&T Missed Commit
44451 SURFWOOD DR, MENDOCINO	7079371834	11/4/16	11/9/16	AT&T Missed Commit
541 S WHIPPLE, FORT BRAGG	7079642980	11/5/16	11/10/16	AT&T Missed Commit
10700 FORD, MENDOCINO	7079372956	11/7/16	11/10/16	AT&T Missed Commit
21851 N PETALUMA AV, FORT BRAGG	7079629267	11/7/16	11/10/16	AT&T Missed Commit
32260 N HARBOR DR, FORT BRAGG	7074096829	11/8/16	11/10/16	AT&T Missed Commit
347 CYPRESS, FORT BRAGG	7079641820	10/28/16	11/11/16	AT&T Missed Commit
1450 E OAK, FORT BRAGG	7077349064	11/9/16	11/12/16	Trouble Ticket Open
455 N HARRISON, FORT BRAGG	7079644756	11/10/16	11/12/16	Trouble Ticket Open
10550 LANSING, MENDOCINO	7073971435	11/10/16	11/12/16	Trouble Ticket Open
10791 CUMMINGS, MENDOCINO	7079373915	10/25/16	11/14/16	Port Change Port Change 11/14
10490 HILLS RD, MENDOCINO	7073971810	11/15/16	11/15/16	Trouble Ticket Open
43705 LITTLE LAKE RD, MENDOCINO	7073971482	11/15/16	11/15/16	Trouble Ticket Open
9255 N HIGHWAY 1, MENDOCINO	7079370588	11/14/16	11/16/16	Trouble Ticket Open
10600 GURLEY LN, MENDOCINO	7079371466	11/14/16	11/16/16	Trouble Ticket Open
44071 LITTLE LAKE RD, MENDOCINO	7079373110	11/14/16	11/16/16	Trouble Ticket Open
32773 TUCKER LN, FORT BRAGG	7077349033	11/14/16	11/16/16	Trouble Ticket Open
32401 AIRPORT RD, FORT BRAGG	7077349025	11/14/16	11/17/16	Trouble Ticket Open

Nov. 29th, 2016

PUC Commissioners
505 Van Ness Avenue
San Francisco, CA

Dear Commissioners,

I am providing this testimony in the hopes that it might help to bring better service for landline maintenance here in Mendocino County.

I live in Redwood Valley (Mendocino County) and have had continued problems with my landline over the past few years. Starting again this year with the first rains in early November, we had static on our line for weeks, and then it went completely dead. I called every few days (from my cell, which barely works from my home) to check on the status of a service call without results. I was only able to get the line fixed on the 16th, probably because I told AT&T that there might be press attention to our issue as an example of how they are neglecting maintenance of phone lines in our county. A manager at the corporate offices in Dallas TX then called me to make sure a tech showed up and got the line working again. This manager told me that they have a lot of people with service out in our area due to "weather-related problems" and that all the problems relate to the old copper lines which they will not replace unless they literally cannot provide service on. I explained that our phone line has been on the ground for the last two/three years when a windstorm took it down and it always malfunctions in the rain (please see the attached photos). He said that there were "aware of this and that permanent solution will be when they replace the old copper lines with fiber in 5-10 years."

The tech who got the phone working again was non-committal about getting the line back up on the poles as well. The line on the ground is supposedly a temporary line but they always come up with some excuse why they can't replace it properly and put it back up on the poles. It's frustrating as we're trying to run a business from our home. The tech said the problem was with a bird nest on top of a pole that is on Inez Way between our property and West Road. Damage to the plastic coating of the line and water accumulation had caused corrosion to the connections. He says it had nothing to do with the line on our property being on the ground and elevating our line won't keep it from happening in the future.

He said he actually repaired the problem with the bird nest about two weeks ago, responding to our service ticket about static on the line. But it seems that whatever he did caused our line to stop working entirely. He says since our phone was dead and there wasn't another phone number on the ticket, he couldn't call to get the gate code so he just left us without service. When we filed a new repair ticket because we had no service at all, it took two weeks and the threat of press coverage and the supervisor in Dallas to get it fixed.

This lack of prompt attention to service tickets and getting a "run-around" all the time is very concerning. When I talked to AT&T's "Emergency Expedite" department on 11/11/2016 about

our line, I was told by the representative that in the 707 area code they had been told not to expedite any more repair tickets because the techs were already overloaded. She said our ticket would be lowest priority because it's not a business or medical emergency situation, and our line is a residential line. This is very frustrating, especially because the cell reception is so poor that my mobile phone barely works (also AT&T).

I have already filed a complaint with the CPUC, and taken their survey in this proceeding as well.

Kind Regards,

Sattie Clark

A handwritten signature in cursive script, appearing to read 'Sattie Clark', written in black ink.

Sattie Clark
1482 Inez Way
Redwood Valley, CA 95470
sattieclark@gmail.com
503-314-0456 (cell)
707-485-1165 (landline)

Photo 1: Shows phone line coiled on the ground. Photo taken by Eric Kaster at 1482 Inez Way, Redwood Valley, CA 95470 11/16/16, 11:27 am



(below left photo)

Shows markings on next pole, about 100' up hill from coiled line. Photo taken by State Clark at 1482 Inez Way, Redwood Valley, CA 95470, 11/16/16 1:37 pm



(Right photo)
Shows the same pole as in previous photo, with detail of the line being diverted down the pole to the ground. Photo taken by State Clark at 1482 Inez Way, Redwood Valley, CA 95470 11/16/16 1:37 pm



CPUC Commission
505 Van Ness
San Francisco, CA

November 29, 2016

Diane Schankin
40180 Wilderness Lodge Road
Branscomb, CA 95417
707-984-8507
dustidi@gmail.com

Dear Commissioners,

I would like to provide testimony in the Rural Call Completion proceeding as to the unreliability of my landline phone service and the need for the Commission to take immediate action to address problems that have been on-going for many years. In the last two months of October and November 2016, I estimate that my landline has only worked 50% of the time. This means that I have **no access to 9-1-1** 50% of the time as well. My husband is disabled, and there are young children who live at this location. I can only pray that a medical emergency does not happen during a time when my phone is not working.

This is not a new problem, as it has been happening for about the last ten years (I have had a landline since I moved here 20 years ago). What we have gone through with our landline is literally crazy-making.

Every time it rains, even a drizzle, my phone doesn't work. Then when it dries out, the phone is back. I usually do not call anyone because I have no phone to call with. If I use a neighbor's phone to call, I usually have to wait at least three days for the phone company to get here, and then if they do show up as scheduled (they often didn't) if the rain has stopped the phone is working again, so it's determined there is "no problem." Two years ago technicians said that they fixed a problem with lines several miles away at the local school, and that this would fix our problems, but nothing of the sort has happened. Our line continues to go out every time it rains. Recently, after receiving a guarantee for the third time that our line would be fixed but never having anyone come to our house, I resorted to leaving a note on the side of Verizon Truck that I found parked along our road. I would really like to keep our landline, but this is just getting to be too much.

Here are some other crazy things that we have had to deal with recently:

- Two weeks ago we received a call at 10:30 pm from the police saying that they received a 9-1-1 call from our number and wanted to check on us, but we had not called. We were sleeping.
- The phone rings once, and if you answer you get nothing but static.
- When raining the phone will only ring once

- The phone rings, occasionally when raining, there is only someone speaking Spanish.
- The phone will ring one time at all hours of day and night, but no one is there.
- People call us and get a busy signal, which is not correct.
- People call us and are told the number is not in service, which is not correct

This happens in many places and not just at my house. I worked at the local health center for 10 years, and a common problem at that time was that when it rained people could only call/receive calls from within the "984" calling area.

When my phone has problems, if I call from my home number to report static, I can usually make a report. They have me go through the same procedure every time (go outside and plug my phone into the box, etc and the problem is always determined to be on "their" side...) But when the phone is out completely and I have to use a different number (neighbors or a cell phone) it's much more difficult to report the problem and to actually talk to a live person.

I am ready to give up my landline, even though I have had the same number for 20 years and do not want to. The hassle and paying for a service that only works 50% of the time during the winter season is just too frustrating. It is a real shame to let these go, because in rural areas we depend on these landlines and they worked well for so long. There is no internet (except satellite) and the cell coverage is spotty and expensive.

Thank you for this opportunity to tell my story.

I swear that the above testimony is true.



Diane Schankin

November 29, 2016

----- Forwarded Message -----

Subject: Daily email for trouble tickets...
Date: Tue, 15 Nov 2016 14:15:05 -0800
From: James Persky <jim@pacific.net>
Reply-To: jim@pacific.net
To: Trish Steel <chairman@mendocinobroadband.org>, Sage Statham <manager@mcn.org>
CC: Trish Steel <trish@mendocinobroadband.org>

This is the canned response we get daily now....This is just one example...

hello,

This message is in regards to Fusion circuit STI-0088653-2.

We have contacted AT&T and have been informed that they are still behind in the work load. They are raising priority on all missed commits, but they are not granting escalations at this time unless it's a medical emergency. They are working them as fast as they can, we apologize for the inconvenience. We will update you once we receive any further information.

Please let us know if there is anything else we can do for you.

Thank you,

It never ends!

jim

----- Forwarded Message -----

Subject: Re: trouble tickets?
Date: Mon, 14 Nov 2016 10:12:15 -0800
From: James Persky <jim@pacific.net>
Reply-To: jim@pacific.net
To: Sage Statham <manager@mcn.org>, Trish Steel <chairman@mendocinobroadband.org>
CC: Trish Steel <trish@mendocinobroadband.org>

I really don't have the resources to hire a photographer or even know what to photograph. I asked support about telephone ID badges and they didn't know what that was. What we've been told is the entire 707 area code area is under "severe workload" so there are not ETAs. We have 10 open trouble tickets and 4 orders that were to be completed by November 4th that never got installed. We did have one trouble ticket fixed on 11/10. All our customers are in the Ukiah area. I had hoped to get a letter written by now but 75% of my staff is still out so I'm pretty much a one man show for now :-)

thanks,

jim

On 11/14/16 9:52 AM, Sage Statham wrote:

> We have 18 tickets that have missed commit times. All of these tickets are in Mendocino and Fort Bragg. They are not in any specific area within each location.

>

> -Sage Statham

> Manager

>

> Mendocino Community Network

> manager@mcn.org

> (707)937-1444 ext123 | (800)796-3896 ext123

>

----- Forwarded Message -----

Subject: Re: trouble tickets?

Date: Mon, 14 Nov 2016 14:04:40 -0800

From: James Persky <jim@pacific.net>

Reply-To: jim@pacific.net

To: Trish Steel <chairman@mendocinobroadband.org>, Sage Statham <manager@mcn.org>

CC: Trish Steel <trish@mendocinobroadband.org>

I stand corrected. Not "severe workload", "high workload"

I also recieved email that they will dispatch if it's a medical emergency. So I guess we need to tell our customers if they plan on having a medical emergency they need to give us a few days notice so we can send at&t out.....

jim

----- Forwarded Message -----

Subject: loosing customers

Date: Wed, 16 Nov 2016 11:17:46 -0800

From: James Persky <jim@pacific.net>

Reply-To: jim@pacific.net

To: Trish Steel <chairman@mendocinobroadband.org>, Sage Statham <manager@mcn.org>

CC: Trish Steel <trish@mendocinobroadband.org>

This is the part that really irks me. We begin to loose customers.

"Contacted Sonic again, no ETA of ATT on this activation. Customer said they do need service by next monday and they may have to look elsewhere if the service isn't up soon."



at&t

Area Dispatch Status

The color of the state indicates the highest level of facility status. Hover over the state for more info. Click the state to get the details for that state and region.

-  Generally inaccessible; severe facility damage; safety hazards (water, power, debris); dispatching only on essential services - i.e., FEMA, TSP, public safety
-  Severe facility damage; limited access to areas in the exchange; sweeps being performed; surveys continuing; limited dispatching
-  Heavy repair load; Expect delays/extended intervals
-  Normal operations



Current dispatch status as of 11/17/2016 06:50 PM CST.

From: Patricia Steel tsteel108@icloud.com
Subject: Fwd:
Date: November 17, 2016 at 5:44 PM
To:

Hi Trish;
I don't know if it is necessary, but Henrietta's address is:

Henrietta Simonsson
6801 Third Gate Road
Willits, CA 95490

Good Afternoon Trish;

I was hopeful that after I wrote to Rhuenette (the north coast representative for AT&T) on November 7th, that this problem would be addressed. Unfortunately, she has not responded even though she gave me her email address to further the discussions initiated after their Board of Supervisor's presentation, October 27, 2016. At that meeting, they stated to the BOS that they thought their network upgrades have "fixed" these problems. But they have not fixed the problem for us, and it's not getting better, and in fact it's getting worse and AT&T is not responding to our concerns.

You had requested photographs of cable problem areas, but unfortunately, the problem appears to be in the Sherwood creek crossing, not necessarily in the junction boxes (those pale green pillar-like units about 3' tall -- which appear to be in good condition). The cable crosses Sherwood Creek underground, and the junction terminations on either side, are on private property and there is no way for me to get to them to photograph or obtain marking/ID. After that, it comes up and follows 3rd Gate and Skyview roads underground to the individual properties (where an additional green junction box lies at each property). Again, there are over 30 properties that AT&T serves here (Verizon/Frontier serves the other half, in the northern section of the community). All telephone cable is buried in the 3rd Gate area as there are no telephone / electrical poles.

I can talk to the lady I mentioned since the cable appears to come up on her property and that is where she finds AT&T working on the problem, but I think it would be better that AT&T contacted her directly. Her name is Henrietta Simmonson (the ER nurse I mentioned), and her cell number is 707.354.0179. AT&T is well aware of the problems here since the entire block of customers gets taken down when the wet weather arrives and I know several call every year.

Trish, Henrietta depends upon her AT&T landline, especially in her care of a diabetic foster kid, because cell service is spotty, at best, where she lives. Many of our residents are aging and are also dependent on their landlines for 9-1-1. Is there anything you can do to help us get relief? I have pasted in a copy of the email to Rhuenette/AT&T below.

Thank you in advance;
Sincerely;
Brian Corzilius
6951 Third Gate Rd.
Willits, CA 95490
707.894.4634

*** Start email to Rhuenette ***

Date: Mon, 07 Nov 2016 11:17:15 -0800
To: ra5361@att.com
From: Brian Corzilius <bcorzilius@corzilius.org>
Subject: AT&T wet-weather outages, Sherwood area
Cc: bcorzilius@corzilius.org
Mime-Version: 1.0
Content-Type: text/plain; charset="us-ascii"; format=flowed

Good Morning Rhuenette;

We talked briefly at last Tuesday's Board of Supervisor's meeting (I had spoken regarding Dataconnect outages, potentially linked to recent AT&T upgrades).

I am writing you today because I was speaking with a neighbor here in my community (Sherwood Gates; 1st, 2nd and 3rd Gate, rough miles 5-7 of Sherwood Road, NNW of Willits), and she noted she couldn't use her (AT&T) landline again, following the rains. I mentioned AT&T's presentation and that they thought they had fixed these issues and wanted to hear from anyone if the issue was persisting. She said she has been trying to reach AT&T but has not been able to reach a service person yet. I gave her your phone number (her name is Henrietta Simonsson, and ER nurse) since she has medical needs behind keeping her landline active (cell reception is spotty where she lives).

AT&T's line comes in from 1st Gate, crosses Sherwood Creek over to Third Gate. It serves roughly 30 customers in the lower 3rd Gate/Skyview loop. This connection is persistently prone to wet-weather impact, including static to complete failure. Last year, the AT&T service person that came out said that AT&T needs to put some money in this branch but that they seemed to have decided to let it die of atrophy.

I hope that you can connect Henrietta to the appropriate personnel so that this can be resolved

I hope that you can connect Henrietta to the appropriate personnel so that this can be resolved.
I also hope that you will be able to help this area have better overall AT&T service (landline, cell, data).

Thank you for your time;
Sincerely
Brian Corzilius
6951 Third Gate Rd.
Willits, 95490
707.894.4634
*** End email copy ***

GAO Highlights

Highlights of [GAO-16-167](#), a report to congressional requesters

Why GAO Did This Study

The communications sector is essential to the nation's economy and government operations and for the delivery of public safety services, especially during emergencies. As the sector transitions from legacy networks to IP-based networks, consumer and public safety groups and others have raised concerns about how the communications networks will function during times of crisis.

GAO was asked to examine the reliability of the nation's communications network in an IP environment during times of crisis. GAO examined (1) the potential challenges affecting IP networks in times of crisis and how the challenges may affect end users, and (2) the actions FCC, DHS, and other stakeholders have taken to ensure the reliability of IP communications. GAO reviewed FCC and DHS documents as well as FCC proceedings and comments filed with FCC on the IP transition and emergency communications. GAO assessed FCC's efforts to collect data on the effect of the IP transition. GAO interviewed officials from FCC and DHS, and representatives from the three largest telecommunications carriers, industry associations, and public interest and consumer advocacy groups.

What GAO Recommends

FCC should strengthen its data collection efforts to assess the IP transition's effects. FCC did not agree or disagree with the recommendation and stated it has a strategy in place to oversee the IP transition. However, GAO continues to believe FCC should strengthen its data collection efforts.

View [GAO-16-167](#). For more information, contact Mark Goldstein at (202) 512-2834 or GoldsteinM@gao.gov.

December 2015

INTERNET PROTOCOL TRANSITION

FCC Should Strengthen Its Data Collection Efforts to Assess the Transition's Effects

What GAO Found

As the nation's telecommunications systems transition from legacy telephone networks to Internet Protocol (IP)-based networks, telecommunications carriers can face challenges during times of crisis that affect end users' ability to call 911 and receive emergency communications. These challenges include (1) preserving consumer service and (2) supporting existing emergency communications services and equipment. For example, during power outages, consumers with service provided over IP networks and without backup power can lose service. The Federal Communications Commission (FCC) is working to address this issue by adopting rules that will require carriers to provide information to consumers on backup power sources, among other things. Another challenge is that IP networks may not support existing telecommunications "priority" services, which allow key government and public-safety officials to communicate during times of crisis.

FCC, the Department of Homeland Security (DHS), and telecommunications carriers have taken various steps to ensure the reliability of IP communications, for example:

- FCC proposed criteria—such as support for 911 services, network security, and access for people with disabilities—to evaluate carriers' replacement of legacy services when carriers seek to discontinue existing service.
- DHS coordinated the development of the *Communications Sector Specific Plan* to help protect the nation's communications infrastructure.
- Carriers told GAO they build resiliency and reliability into their IP networks as part of business operations and emergency planning.

FCC is also collecting data on the IP transition, but FCC could do more to ensure it has the information it needs to make data-driven decisions about the transition. FCC has emphasized that one of its statutory responsibilities is to ensure that its core values, including public safety capabilities and consumer protection, endure as the nation transitions to modernized networks. FCC stated that fulfilling this responsibility requires learning more about how the transition affects consumers. FCC plans on collecting data on the IP transition primarily through voluntary experiments proposed and run by telecommunications carriers. However, it is unclear if FCC will be able to make data-driven decisions about the IP transition because of the limited number and scale of the proposed experiments. In particular, there are only three proposed experiments that cover a very limited number of consumers; none of the experiments covers consumer services in high-density urban areas or includes critical national-security or public-safety locations. FCC also sought comment on how to supplement its data-gathering process; however, soliciting comments may not necessarily result in a change in FCC's existing policies. GAO found FCC lacks a detailed strategy that outlines how it will address its remaining information needs. Developing a strategy for collecting information about how the IP transition affects public safety and consumers would help FCC make data-driven decisions and address areas of uncertainty as it oversees the IP transition.