



June 20, 2025

Honorable Tina McKinnor  
California State Assembly  
1021 O Street, Suite 5520  
Sacramento, CA 95814

**Re: AB 470 (McKinnor) v. 6/20/2025 – Oppose Unless Amended**

Dear Assemblymember McKinnor:

The Public Advocates Office is the independent consumer advocate at the California Public Utilities Commission (CPUC). We advocate for customers of communication companies in California by analyzing and recommending solutions in several areas including improving service quality, advancing the state's access and affordability broadband goals, and participating in CPUC on their behalf.

We regretfully write in opposition to the latest amended version of AB 470 which, among other provisions, would mandate the CPUC to adopt a flawed process reliant on inaccurate data maps through which a telephone corporation acting as a Carrier of Last Resort (COLR) may be relieved of their COLR obligations in ways that risk leaving many Californians without adequate access to basic telecommunication service, modern broadband infrastructure, and critical access to 911 services.

California stands at a crucial juncture in its efforts to ensure equitable access to modern telecommunications services. In June 2024, the CPUC commenced Rulemaking 24-06-12, Order Instituting Rulemaking Proceeding to Consider Changes to the Commission's Carrier of Last Resort Rules. This proceeding aims to review and possibly update COLR rules, including COLR relief procedures. This proceeding is currently underway and the CPUC should be allowed to finalize it.

Thousands of residents communicated fears of losing service given their dependency on AT&T wireline for communications despite asserted available mobile alternatives. AT&T's reliance on

FCC broadband maps, which have produced well past 2 million errors,<sup>1</sup> is misguided in showing mobile **voice** coverage. The reason is simple, broadband data coverage is different than mobile voice cellular coverage. If the Commission is forced to use inaccurate FCC data to determine which communities are “well served” as written in AB 470, the agency will be forced to put at risk an incalculable number of Californian residents.

California’s major telecommunications service providers should transition to modern broadband infrastructure while ensuring no one is left behind. AB 470 in its current form falls short on that effort.

Sincerely,



Linda Serizawa  
Director

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<sup>1</sup> See Jonas Marques et al., *Are We Up to the Challenge? An Analysis of the FCC Broadband Data Collection Fixed Internet Availability Challenges* (Apr. 8, 2024) (working paper), <https://arxiv.org/abs/2404.04189>; and Syed Tauhidun Nabi et al., *Red is Sus: Automated Identification of Low-Quality Service Availability Claims in the U.S. National Broadband Map*, in Proceedings of the 2024 ACM Internet Measurement Conference (IMC '24), (Nov. 4–6, 2024), <https://doi.org/10.1145/3646547.3688441>.