

March 1, 2024

Ms. Alice Busching Reynolds, President California Public Utilities Commission 405 Van Ness Avenue San Francisco, CA 94102

RE: Opposition to AT&T's Applications for Targeted Relief from its Carrier of Last Resort Obligation and Relinquish its Eligible Telecommunications Carrier Designation (A.23-03-003 and A.23-03-002)

On February 28, 2024, the City Council for the City of Calabasas, CA voted to oppose AT&T's applications for targeted relief from its Carrier of Last Resort obligation and relinquish its Eligible Telecommunications Carrier designation. Calabasas is located in west Los Angeles County and is in the territory AT&T seeks to withdraw from and relinquish its obligation to provide landline service. The City is vehemently opposed to AT&T's applications for targeted relief from its Carrier of Last Resort obligation and relinquish its Eligible Telecommunications Carrier designation for the following reasons:

- 1. Calabasas sits in the foothills of the Santa Monica Mountains and has been designated as a Very High Fire Hazard Severity Zone by CAL Fire. Wildfires are common in our region. As recently as November 2018 every one of the nearly 24,000 residents in our city was forced to evacuate ahead of the Woolsey Fire. Many of those evacuation orders came over traditional landlines which AT&T is now proposing to drop. AT&T may be doing this in other parts of the United States and replacing traditional landlines with AT&T Mobility or a different voice service; but the City of Calabasas is different and deserves special consideration because this plan relies on cellular technology which will fail if a wildfire were to destroy cell towers.
- 2. Southern California recently observed the 30th Anniversary of the deadly Northridge Earthquake of 1994. However, this area is still overdue for a major earthquake which would likely also disrupt cellular service. Traditional landline service has been shown to be much more likely to survive such an event. Area residents and businesses look to traditional landlines as a "lifeline" to obtain information when disaster strikes.

Ms. Alice Busching Reynolds, President California Public Utilities Commission March 1, 2024 Page 2

- 3. The City of Calabasas and its neighboring cities are in mountainous terrain and cellular service is poor even in the best of times. AT&T's application reduces communication options for area residents and businesses and leaves our communities in a vulnerable position during natural disasters.
- 4. Voice Over Internet Protocol is not a reliable option as power outages and internet connectivity would also be compromised in either an earthquake or a wildfire.

The City of Calabasas respectfully requests that the California Public Utilities Commission deny the applications by AT&T for Targeted Relief from its Carrier of Last Resort Obligation and Relinquish its Eligible Telecommunications Carrier Designation.

Respectfully,

CITY OF CALABASAS

Alicia Weintraub, Mayor

AW/mr

c/ public.advisor@cpuc.ca.gov via email
Hope Christman, Local Government and Community Liaison, CPUC via email



March 1, 2024

Ms. Alice Busching Reynolds, President California Public Utilities Commission 405 Van Ness Avenue San Francisco, CA 94102

RE: Opposition to AT&T's Applications for Targeted Relief from its Carrier of Last Resort Obligation and Relinquish its Eligible Telecommunications Carrier Designation (A.23-03-003 and A.23-03-002)

On February 28, 2024, the City Council for the City of Calabasas, CA voted to oppose AT&T's applications for targeted relief from its Carrier of Last Resort obligation and relinquish its Eligible Telecommunications Carrier designation. Calabasas is located in west Los Angeles County and is in the territory AT&T seeks to withdraw from and relinquish its obligation to provide landline service. The City is vehemently opposed to AT&T's applications for targeted relief from its Carrier of Last Resort obligation and relinquish its Eligible Telecommunications Carrier designation for the following reasons:

- 1. Calabasas sits in the foothills of the Santa Monica Mountains and has been designated as a Very High Fire Hazard Severity Zone by CAL Fire. Wildfires are common in our region. As recently as November 2018 every one of the nearly 24,000 residents in our city was forced to evacuate ahead of the Woolsey Fire. Many of those evacuation orders came over traditional landlines which AT&T is now proposing to drop. AT&T may be doing this in other parts of the United States and replacing traditional landlines with AT&T Mobility or a different voice service; but the City of Calabasas is different and deserves special consideration because this plan relies on cellular technology which will fail if a wildfire were to destroy cell towers.
- 2. Southern California recently observed the 30th Anniversary of the deadly Northridge Earthquake of 1994. However, this area is still overdue for a major earthquake which would likely also disrupt cellular service. Traditional landline service has been shown to be much more likely to survive such an event. Area residents and businesses look to traditional landlines as a "lifeline" to obtain information when disaster strikes.

Ms. Alice Busching Reynolds, President California Public Utilities Commission March 1, 2024 Page 2

- 3. The City of Calabasas and its neighboring cities are in mountainous terrain and cellular service is poor even in the best of times. AT&T's application reduces communication options for area residents and businesses and leaves our communities in a vulnerable position during natural disasters.
- 4. Voice Over Internet Protocol is not a reliable option as power outages and internet connectivity would also be compromised in either an earthquake or a wildfire.

The City of Calabasas respectfully requests that the California Public Utilities Commission deny the applications by AT&T for Targeted Relief from its Carrier of Last Resort Obligation and Relinquish its Eligible Telecommunications Carrier Designation.

Respectfully,

CITY OF CALABASAS

Alicia Weintraub, Mayor

Peter Kraut, Mayor pro Tem

Ed Albrecht, Councilmember

James R. Bozajian, Councilmember

David J. Shapiro, Councilmember

c/ public.advisor@cpuc.ca.gov via email
Hope Christman, Local Government and Community Liaison, CPUC via email