



**Frontier CASF Broadband Infrastructure Grant Application
Item 1 – Project Summary**

Company/Applicant Name:	Frontier of California Inc. (“Frontier”)
CPCN/U-Number:	U-1002-C
Contact Person:	Diane Williams-Stinson Vice President – Grant Administration 401 Merritt 7 Norwalk, CT 06851 (260) 438-7003 Diane.Williams-Stinson@ftr.com
Project Title:	Imperial County
Named Project Location:	Portions of the community of Thermal in Imperial County
Project Type:	Last Mile
Amount of CASF Grant Funding Requested	\$6,124,398.30
Project Cost	\$6,804,887.00
Map of the proposed project Area:	Please see Attachment 1.01
Number of serviceable locations	900
Number of serviceable locations with no internet connectivity	813
Number of other CASF-eligible serviceable locations	87
Maximum mbps download and uploaded speed currently offered in the serviceable area	≤25/3 Mbps – Unserved (“Priority Eligible”) Locations ≤100/20 Mbps – Underserved (“Eligible”)
Medium Household Income of the project area	\$28,962
Number of businesses	0
Number of Anchor Institutions	0
Number of Public Safety Locations	0



Description of the Major Infrastructure to be Deployed

The project will place 78.04 miles of planned fiber and will utilize 2 central offices to connect 900 Priority Eligible and Eligible locations with premier Fiber-To-The-Premises (“FTTP”) symmetrical services. It is estimated that this project will be approximately 35% aerial and 65% underground installation. This project involves 100% last mile fiber deployment.

Frontier will deploy best-in-class xPON - Gigabit Passive Optical Network (“GPON”) (ITU-T G.984) and XGS-PON (ITU-T G.9807.1). Frontier currently uses xPON architecture throughout its network and has already made FTTP available to more than 5.2 million consumers across its 25-state footprint, including to homes and businesses in California.

The deployed network technology is 10 Gbps-capable, and currently supports symmetrical 5 Gbps residential broadband speeds. In addition, as reflected by the publicly available results of the FCC’s Measuring Broadband America Program, xPON readily meets speed and latency requirements (i.e., <100 ms latency).¹ In fact, Ookla, recently recognized Frontier’s fiber network for its low latency and for having the fastest internet upload speeds in America.² In California, the company ranked #1 for Top-Rated Internet, Fastest Internet Upload Speeds, and Lowest Internet Latency.³ Accordingly, the network to be deployed readily supports high bandwidth applications in use today like video conferencing, telehealth services, and gaming, as well as emerging augmented/virtual reality applications that are increasingly a part of daily living and a premium broadband service experience.

In short, Frontier is deploying FTTP—the most scalable, best-in-class broadband infrastructure—which is designed to accommodate ever-increasing bandwidth requirements and quality demands, and lower response/latency demands for ever-increasing usage of highly interactive applications.

Estimated Construction Timeline

The timeline for Construction through Project Closeout is estimated to be approximately 18 months after final permit approval if the project is categorically exempt from CEQA or approximately 24 months after CEQA resolution approval.

¹ See generally FCC, *Measuring Broadband America* (last accessed Jan. 30, 2021).
<https://www.fcc.gov/general/measuring-broadband-america>

² According to Ookla Speedtest results for Q1 2023.

³ See [Frontier Communications Parent, Inc. - Frontier Crushes the Competition with the Fastest Internet Upload Speeds in America](#)



Description of proposed Broadband Project

Frontier proposes to deploy a last mile “future-proof” FTTP network that will make 5 Gbps symmetrical service available to 813 Priority Eligible and 87 Eligible homes primarily in portions of the community of Thermal in Imperial County.

The project requires a capital investment of \$6,804,887 for the eligible locations. Frontier commits to cover 10% of the project costs and is requesting grant support for the remaining 90%. Frontier’s funding request is limited to the identified grant-eligible project locations.

Frontier’s proposed FTTP network will deliver a broad range of economic and quality of life benefits to the targeted locations by providing access to advanced, high-speed broadband services that improve economic opportunities, and support critical e-learning and healthcare applications. In addition, a defining and differentiating feature of the network is that it readily supports higher speed tiers as capacity needs grow. Frontier has already demonstrated this capability as the first provider nationwide to make 5 Gbps symmetrical service available to residential consumers.

Based on its current expansion capability of up to 10 Gbps (without the addition of system electronics), the Project proposes to deploy infrastructure robust enough to not only meet current need but also capacity needs well into the future. The proposed xPON fiber network is also capable of readily scaling to support 25 Gbps and 50 Gbps symmetrical speeds as capacity needs grow. Frontier has already started testing these speeds in preparation for deploying them as market demand and customer premises equipment becomes available in future years. Furthermore, future increases in capacity and performance can be achieved without major construction or cost through the addition of new and/or upgraded electronics—there is no need to replace or augment the transmission distribution facilities as is the case with other technologies. As a result, the planning and timing of future upgrades is driven by the comparatively short timelines for engineering, procurement, and installation of new electronics in the network and at the customer premises rather than major external construction factors. Because they are economically scalable for even faster speeds, fiber networks are frequently described as “future-proof.”

Construction Detail to Enable Preliminary Indication of the need for a California Environmental Quality Act (CEQA) review



Frontier proposes to install 78.04 miles of new fiber-optic cable, which would extend high-speed internet service to unserved and underserved residents in Imperial County. Fiber installations would take place near the communities of Salton City, Salton Sea Beach, and Desert Shores. In general, proposed fiber routes are located along local roadways; however, some segments are on or adjacent to State Highway 86.

Fiber would be installed using a combination of existing infrastructure, where available, supplemented by new underground conduit and/or aerial installations. New infrastructure would be installed within existing right-of-way and utility easements in developed areas where previous ground-disturbance activities have occurred.

Underground conduit would generally be installed at a depth of 18 to 48 inches by either boring, trenching, or plowing, depending on the location and local, state, and federal requirements. In some cases, to avoid existing infrastructure, new underground conduits may be required to be installed significantly deeper.

Frontier anticipates that the proposed project will either be categorically exempt from CEQA review, pursuant to CEQA guidelines 14 C.C.R. § 15301 regarding exemption for existing facilities and 14 C.C.R. § 15303 regarding minor modifications to existing structures; or will require development of a Mitigated Negative Declaration (MND). Final design and a more detailed review of resources present will inform the level of CEQA review required for the project.

Identification of the leveraging of existing available facilities

Frontier will leverage all existing infrastructure within the Right of Way, including existing poles, underground systems, and where Frontier currently has direct buried conduit and facilities. For project sections where boring and trenching is required, Frontier will restore those areas back to their original (or better) condition once construction is completed.

Statement of whether the applicant is disputing the Broadband Map depiction of served status.

Frontier does not dispute the Broadband Map depiction of served status.

A statement of whether the applicant is seeking Ministerial Review and, if so, information that the application meets all requirements for Ministerial Review.



Frontier is seeking Ministerial Review for this project. The project meets all requirements for Ministerial Review as follows:

1. Applicant and the project meet the program eligibility requirements. Frontier has a Certificate of Public Convenience and Necessity (CPCN) that qualifies it as a telephone corporation. The project is eligible because it will offer speeds of up to symmetrical 5 Gbps in an unserved area.
2. Applicant offers a low-income broadband plan. Frontier offers qualified low-income households affordable internet service through participation in the Federal Affordable Connectivity Program (ACP). ACP is a non-transferable (from one person to another) government assistance program that provides a discount on the cost of broadband internet access service. Once a household's ACP eligibility has been established, they may sign up for one of Frontier's low-income product offerings. Frontier service plans currently available to ACP qualified customers include the following fully symmetrical offers:

Fiber 100:	\$0.00 per month (\$29.99 with a \$29.99 ACP credit)
Fiber 500:	\$19.99 per month (\$49.99 with a \$30.00 ACP credit)
Fiber 1 Gig:	\$39.99 per month (\$69.99 with a \$30.00 ACP credit)
Fiber 2 Gig:	\$ 69.99 per month (\$99.99 with a \$30.00 ACP credit)
Fiber 5 Gig:	\$124.99 per month (\$154.99 with a \$30.00 ACP credit)

In addition, Frontier offers the following low-income programs to its California customers. These programs provide symmetrical minimum speeds of 50 Mbps, where available.

- Frontier Affordable Broadband™ requires customers to be enrolled in Lifeline telephone service; rates for Broadband are \$13.99 per month.⁴
 - Frontier Fundamental™ is a stand-alone low-income broadband program that does not require a customer to purchase telephone service. The current rate is \$19.99 month (includes \$14.99 internet service plus \$5 monthly router charge.⁵
3. The application is not challenged, or if challenged, the challenge is not upheld, or Staff has determined that the project area is unserved. To be determined.
 4. The total grant amount does not exceed \$25,000,000. Frontier seeks a grant amount which does not exceed \$25,000,000.

⁴ See [Frontier Affordable Broadband Internet - Low Cost | Frontier](#)

⁵ See [Frontier Fundamental Internet Service - Budget-Friendly | Frontier](#)



5. The project is CEQA-exempt or approval letter must state that authorization to construct and release funds will be provided in a forthcoming resolution. Frontier expects this project to be CEQA exempt. Please see above for additional information.
6. There must be no competing applications for the same project area in the same application period. To be determined.
7. Costs per serviceable location are less than \$24,700 for wireline projects. Per location costs for this project are less than \$24,700.

An explanation of why any middle mile facilities in the proposed project are necessary for accessing the proposed last-mile infrastructure.

Not applicable. Frontier is not seeking grant funding for any middle-mile facilities in this application.

A statement accepting the open access requirements for any middle mile facilities in the proposed project.

Not applicable. Frontier is not seeking grant funding for any middle-mile facilities in this application.