

March 10, 2016

Oregon Public Utility Commission
PO Box 1088
Salem, Oregon 97308-1088

RE: AR 594

Commissioners,

Thank you for the opportunity to provide input to AR 594. I'm writing on behalf of the City of Portland with a few recommendations.

Application Requirements

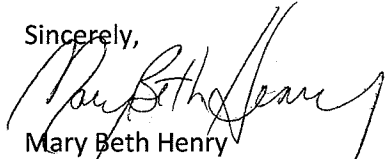
1. Local Government Notification. We believe the applicant should notify the local government at the same time that it submits an application. One of the critiques of local government during the temporary rule process was the lack of time to review and respond to applications.
2. The following information should be included in the "brief description of the project, and how it may affect the city or county":
 - Price: Portland, Multnomah County Libraries and many community-based partners have been working on a Digital Equity Action Plan since the fall of 2015. Through focus groups and extensive community engagement we know that cost is the number one barrier for broadband adoption. A recently completed study, **Digital Inclusion and Meaningful Broadband Adoption Initiatives** (<https://www.benton.org/inclusion-adoption-report>), confirms local findings that cost is the major barrier to broadband adoption. Thus the price of the service should be taken into consideration when determining a qualified project.
 - Minimum speeds should be required. SB 611 provides the capacity should be at "a capacity of at least one gigabit per second symmetrical service, to a majority of the residential customers of the company's broadband services."
 - Timeframe for construction. This is important so that local government staffing is available for requisite permitting and complaints.



- General overview of network architecture. This will allow local government officials to have a general understanding of the impact in neighborhoods.

Finally as we have said in our previous comments significant new capital investment should be an absolute prerequisite for every qualified project determination. Thank you for the opportunity to provide input. We'd be happy to answer any further questions you may have.

Sincerely,



Mary Beth Henry
Office for Community Technology