



## MEMORANDUM

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TO: Oregon Public Utility Commission  
FROM: Lance Powlison, ROW Program Manager  
DATE: February 22, 2016  
SUBJECT: UM 1760 ~ Comments to Comcast application pursuant to SB 611

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Dear Members of the Committee,

Thank you for requesting input from Oregon City regarding Comcast's application to be a Qualified Project. Oregon City would like to assist you, however, several things prevent us from providing all of information you requested. The first is the short timeline for reviewing and responding to your questions, which is less than one week.

Secondly, your question of "whether residential income levels may have any impact on access to services." We believe that question cannot be answered by the jurisdiction providing access to the Rights of Way, but rather should be answered by the internet provider itself, preferably under oath.

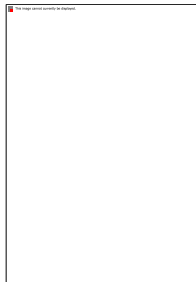
Regarding speed of service, Comcast's materials provide no minimum speeds? SB 611 provides the capacity should be at "a capacity of at least one gigabit per second symmetrical service, to a majority of the residential customers of the company's broadband services." Comcast service does not provide that minimum requirement. (that I am aware of)

In closing, the effective date of SB 611 was October 5, 2015. In order for a project to be “qualified” it requires capital investment in newly constructed or installed infrastructure that enables the company to offer communication services. I do not know of any examples where this has been done since the SB 611 became effective.

Based on current lack of internet speed and lack of NEW investments made in facilities, it does not appear Comcast meets the criteria needed to be qualified.

Thank you for the opportunity to provide feedback,

Lance



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