

DATE: MARCH 1, 2016

TO: THE HONORABLE SUSAN ACKERMAN, CHAIR, OREGON PUBLIC UTILITY
COMMISSION
THE HONORABLE JOHN SAVAGE, COMMISSIONER, OPUC
THE HONORABLE STEPHEN BLOOM, COMMISSIONER, OPUC

FROM: GIL RIDDELL, POLICY DIRECTOR, ASSOCIATION OF OREGON COUNTIES

SUBJECT: MARCH 1, 2016, SPECIAL PUBLIC MEETING; COMCAST UM 1760; FRONTIER UM
1761; GOOGLE FIBER UM 1762.

The Association of Oregon Counties represents all 36 Oregon County governments. County governments share service and revenue responsibilities with the State of Oregon. One of our goals is to work for adoption and implementation of sound public policy that assures citizens have access to effective and appropriate public services.

AOC has major concerns with the pending actions by the Public Utility Commission on three applications: UM 1760/Comcast; UM 1761/Frontier; and UM 1762/Google.

Redactions of portions of all three applications prevent a thorough review and response. These applications are made under newly adopted requirements granting substantial gigabit property tax exemptions. Since AOC was a first-hand participant in the deliberations on, and adoption of, these requirements, counties prefer to use our own judgment to interpret whether the law has been satisfied by the facts presented in the applications.

The staff reports also are extensively redacted, which interferes with our independent judgment of whether these projects are “qualified.” The PUC has a talented staff, but without knowing the time and testing made available to them we cannot know the extent to which mistakes can be made.

Both new and existing businesses may qualify for the new gigabit property tax exemption. Existing companies must provide gigabit service to a majority of its existing customers, as one of the requirements that must be met.

AOC sees no specific information that details the dates, costs, or nature of newly constructed or installed infrastructure for Comcast, an existing business which appears to be seeking a determination of an operational project. Reports in the Oregonian newspaper raise doubts that Comcast has fully operational infrastructure to the required residents and whether services are “offered” as the law intended when available rates appear so costly as to make the service inaccessible.

AOC respectfully requests that the PUC and its staff present materials that permit a thorough independent public review of these three applications.