



PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA
505 VAN NESS AVENUE | SAN FRANCISCO, CALIFORNIA 94102

July 18, 2025

Acting Administrator Adam Cassady
Principal Deputy Assistant Secretary and Deputy Administrator
National Telecommunications and Information Administration (NTIA)
1401 Constitution Avenue, N.W.
Washington, DC 20230

RE: Request for Waiver of 90-Day Deadline Under BEAD Restructuring Policy Notice

Dear Mr. Cassady,

The State of California via the California Public Utilities Commission (CPUC) respectfully submits this request for a waiver of the 90-day deadline set forth in the National Telecommunications and Information Administration's (NTIA) Broadband Equity, Access, and Deployment (BEAD) Program Restructuring Policy Notice. Specifically, we are requesting a 28-day extension to October 2, 2025.

Following approval of California's Initial Proposal Volume Two by NTIA on October 3, 2024, our state's deadline to submit the Final Proposal to NTIA, based on the timeline outlined in the Notice of Funding Opportunity (NOFO), was October 2, 2025. The Policy Notice established a new 90-day deadline to submit the Final Proposal, which eliminated 28 days that are crucial for California to comply with State statutory requirements. To successfully deliver broadband in California through the required Benefit of the Bargain round, the CPUC requests a waiver from NTIA to submit our Final Proposal by our initial deadline of October 2, 2025.

California is fully committed to effectively and efficiently delivering reliable broadband to all residents. However, California's legal requirements necessitate a modest extension of the new 90-day deadline.

After NTIA's release of the Policy Notice, California immediately worked to restructure its process. Specifically:

- From June 18, 2025 to June 25, 2025, we invited Unlicensed Fixed Wireless (ULFW) providers to submit their notice of intent consistent with the Restructuring Policy Notice.
- From June 26, 2025 to July 3, 2025, ULFW providers had an opportunity to provide evidence of their claims of service and an attestation.
- On July 11, 2025, California reopened the prequalification window to all interested applicants.

- California will open the Benefit of the Bargain project application window on July 19, 2025, and it will run to August 2, 2025.

Concurrently, we commenced the process to modify the formal decision of the CPUC that implemented previous NTIA rules and approvals. This process is governed by California law, such as Public Utilities Code §§ 311, 1701, and 1708, as well as implementing regulations. These legal mandates set procedures and timelines regarding how the CPUC must gather and consider evidence to support its decisions and provide due process to parties. The requested 28 days represent the minimum number of days necessary to conform the Commission's previous decision to the Policy Notice, complete the required implementation steps, and submit a Final Proposal compliant with state law.¹

California is one of the largest and most geographically diverse states in the nation, with over 370,000 eligible locations across more than 7,500 project area units. The state is served by more than 200 internet service providers, ranging from national carriers to small regional operators. Given the size and complexity of California's program, NTIA's expedited consideration of this request is necessary for the State to plan for successful implementation. Accordingly, we respectfully request confirmation of acceptance and approval of this letter by July 25, 2025.

Thank you for your continued partnership. We remain fully committed to the deployment of vital broadband infrastructure.

Sincerely,



Maria I. Ellis
Director of Broadband Initiatives
Authorized Organizational Representative
California Public Utilities Commission

¹ Given the extensive work required by the Policy Restructuring Notice and remaining uncertainties in the program, California may need more than 28 additional days to comply with the Policy Restructuring Notice and California law and regulations. If additional time proves necessary, California will inform the NTIA as early as possible and request a further extension via waiver.