

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Rulemaking on the Commission's Own Motion into
Reliability Standards for Telecommunications Emergency
Backup Power Systems and Emergency Notification
Systems Pursuant to Assembly Bill 2393.

R.07-04-015
(Filed April 12, 2007)

**REPLY COMMENTS OF PACIFIC BELL TELEPHONE COMPANY
D/B/A AT&T CALIFORNIA (U-1001-C)
ON THE
ALTERNATE PROPOSED DECISION OF PRESIDENT PEEVEY,
MAILED DECEMBER 22, 2009**

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Pacific Bell Telephone Company d/b/a AT&T California (U-1001-C) (“AT&T California”), pursuant to Commission Rule of Practice and Procedure 14.3, provides the following reply comments regarding the **Alternate Proposed Decision of President Peevey**, mailed December 22, 2009 (hereinafter “Alternate”).

I. INTRODUCTION

Contrary to the claims of the Division of Ratepayer Advocates (“DRA”) and The Utility Reform Network (“TURN”), the Alternate is correct to honor the precedent established by the Commission in D.06-06-010.¹ D.06-06-010 represents the culmination of an extensive inquiry into the regulation of Voice over Internet Protocol (“VoIP”) service, after thorough briefing by numerous interested parties, and it should not be brushed aside without full consideration of the weighty issues raised by state VoIP regulation. The range of issues raised by state VoIP regulation has not even been identified, let alone addressed, in the instant proceeding. Moreover, the regulatory outcome advocated by DRA and TURN – where “fixed” VoIP providers are subject to Commission regulation but “nomadic” providers are not – would hand nomadic VoIP providers yet another unfair regulatory advantage; and potentially drive even more customers from traditional and fixed VoIP providers to nomadic providers that do not supply any backup power and are not subject to any customer disclosure rules imposed by the Commission.

II. DISCUSSION

A. The Alternate Properly Declines To Address The Scope (If Any) Of The Commission’s Authority Over VoIP

Both DRA and TURN criticize the Alternate Decision for adhering to the Commission’s prior determination in D.06-06-010 that it need not take any position at this point on the scope (if any) of its regulatory authority over VoIP. As they see it, the FCC’s *Vonage Order*² preempted state regulation only of nomadic VoIP, leaving the Commission free to assert regulatory authority over facilities-based, non-nomadic VoIP.³ This claim, however, ignores the FCC’s express statement that the preemption analysis it applied in the *Vonage Order* would result in

¹ Decision 06-06-010, *Order Instituting Investigation On The Commission’s Own Motion To Determine The Extent To Which The Public Utility Telephone Service Known As Voice Over Internet Protocol Should Be Exempted From Regulatory Requirements*, Investigation 04-02-007 (June 15, 2006).

² Memorandum Opinion and Order, *In the Matter of Vonage Holdings Corporation Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission*, 19 FCC Rcd. 22404 (2004) (“*Vonage Order*”), *petitions for review denied*, *Minnesota Pub. Utils. Comm’n v. FCC*, 483 F.3d 570 (8th Cir. 2007).

³ See DRA Opening Comments at 6 (Jan. 11, 2010); TURN Opening Comments at 6-7 (Jan. 11, 2010).

preemption of state efforts to regulate *any* VoIP providers sharing the same “basic characteristics” as Vonage’s Digital Voice service, *including VoIP offerings of facilities-based providers*.⁴ Furthermore, the FCC specified the “basic characteristics” warranting preemption, making clear that none of them turn on whether the service at issue is nomadic.⁵

TURN is also wrong to contend that the FCC’s decision to require interconnected VoIP providers – *i.e.*, VoIP providers that deliver traffic to and receive traffic from the PSTN – to contribute to universal service and to adhere to certain E911 rules somehow supports Commission jurisdiction here.⁶ Contrary to TURN’s apparent understanding, those determinations apply to *all* interconnected VoIP providers, nomadic and non-nomadic alike. More importantly, the FCC imposed those regulations pursuant to its undisputed (and exclusive) authority over VoIP, thus establishing only that the FCC (and not this Commission) is the appropriate agency to determine the regulatory framework that applies to VoIP.

That is the lesson, moreover, of the Eighth Circuit’s decision in *Vonage v. Nebraska PSC*,⁷ which TURN wrongly characterizes as supporting the exercise of state jurisdiction over interconnected VoIP.⁸ In that case, the Eighth Circuit *rejected* a state effort to impose state universal service fees on Vonage’s nomadic VoIP service, reasoning that the FCC’s *Vonage Order* means what it says (and, as noted, that order says that state regulation of non-nomadic VoIP would be preempted to the same extent as state regulation of nomadic VoIP). TURN’s reliance on the FCC’s amicus brief in that case is doubly flawed. First, the brief speaks only to whether the application of state universal service assessments would impede federal policy; it draws no distinction between nomadic and non-nomadic VoIP. Second, as TURN is forced to acknowledge,⁹ the Eighth Circuit ignored the FCC’s brief entirely and indeed reached the opposite conclusion to what the FCC had proposed.

TURN also contends that the Commission has authority to regulate *all* VoIP providers, pursuant to the *Vonage Order*’s preservation of state authority to impose “rules of general applicability, including those related to commercial dealings, advertising, and marketing.”¹⁰ But rules specific to telecommunications services, such as the disclosure requirements under

⁴ See *Vonage Order* ¶ 32; *id.* ¶ 25 n.93.

⁵ *Id.* ¶ 32.

⁶ TURN Opening Comments at 7.

⁷ 564 F.3d 900 (8th Cir. 2009).

⁸ TURN Opening Comments at 7.

⁹ TURN Opening Comments at 7 n.15.

¹⁰ TURN Opening Comments at 6 (citing *Vonage Order* ¶ 1 & n.47).

consideration here, are not “rules of general applicability.” TURN therefore cannot use this basis to defend Commission imposition of these telecommunications rules on VoIP services.¹¹

Finally, and in all events, as AT&T has explained throughout, the Commission should not and need not address these difficult jurisdictional questions in this proceeding.¹² The Commission should not address VoIP jurisdiction here because it has neither sought, nor received, comment from interested parties on the many significant issues raised by state regulation of VoIP services.¹³ The Commission need not address VoIP jurisdiction because it can achieve its goals through the issuance of guidelines, which AT&T would commit to follow.

B. DRA’s Suspicion Of Voluntary Commitments Is Misplaced.

DRA makes various inaccurate allegations about past voluntary commitments, erroneously concluding that voluntary commitments are “utterly useless” and always result in “broken promises.”¹⁴ For example, DRA claims that SBC voluntarily committed to “create 1,000 new jobs” within two years of the Telesis merger decision, D.97-03-067.¹⁵ However, D.97-03-067 notes that “this particular promise has been unduly subjected to considerable interpretation.”¹⁶ The Decision then carefully states the actual commitment made: 1,000 jobs “over what would otherwise have been the case under previous plans if this merger had not

¹¹ TURN’s reliance on *Comcast IP Phone of Missouri v. Missouri PSC*, 2007 U.S. Dist. LEXIS 3628 (W.D. Mo. 2007), is likewise misplaced. There, the court merely rejected as unripe a cable VoIP provider’s attempt to prevent, on primary jurisdiction grounds, a state commission from *initiating* a proceeding to determine *whether* the state could require the provider to obtain a certificate. Furthermore, the court in *Comcast IP* specifically noted that, if VoIP were classified as an “information service,” the state commission would have no jurisdiction pursuant to the FCC’s long-standing determination that state regulation of “information services” is preempted. *See id.* As AT&T explained in its November 16, 2009, Reply Comments on the Proposed Decision of Commissioner Simon (at 4-5), interconnected VoIP (nomadic and non-nomadic alike) is an “information service” on the basis of its net protocol conversion and state regulation is therefore preempted on that basis as well. The dispute in Missouri in *Comcast IP* over the scope of the state’s jurisdiction was subsequently mooted by state legislation.

¹² Disability Rights Advocates (“DisabRA”) agrees that the Commission should not address broader VoIP jurisdiction issues. *See* DisabRA Opening Comments at 1 (Jan. 11, 2010) (“DisabRA believes that the optimal solution would be for the Commission to assert jurisdiction on limited public safety grounds, *without engaging in the broader jurisdictional issues. These issues could be avoided* through modifications to either the PD or the pending AD recognizing that the guidelines under review are public safety requirements occupying a separate category of state action which was authorized by the legislature in AB2393, and *do not implicate other jurisdictional questions.*”) (emphasis added).

¹³ *See* Order Instituting Investigation, *Order Instituting Investigation On The Commission’s Own Motion To Determine The Extent To Which The Public Utility Telephone Service Known As Voice Over Internet Protocol Should Be Exempted From Regulatory Requirements*, I.04-02-007, *slip op.* at 12-13 (Feb. 19, 2004).

¹⁴ DRA Opening Comments at 6.

¹⁵ *Id.*

¹⁶ Decision 97-03-067, *In The Matter Of The Joint Application Of Pacific Telesis Group (Telesis) and SBC Communications, Inc. (SBC) for SBC to Control Pacific Bell (U 1001 C), Which Will Occur Indirectly As A Result Of Telesis Merger With A Wholly Owned Subsidiary Of SBC, SBC Communications (NV) Inc.*, Application 96-04-038, *slip op.* at 82 (Mar. 31, 1997).

occurred.”¹⁷ SBC met this commitment, and DRA makes absolutely no showing to the contrary. DRA does not even attempt to determine whether SBC created 1,000 new jobs *over what would have been*. If anything, the data presented by DRA confirm a significant *increase* in jobs in the two years following the merger – a trend consistent with the conclusion that SBC met its commitment.

DRA also points to an October 29, 2009 letter by State Senator Alex Padilla and Assemblymember Filipe Fuentes to President Peevey, noting concerns about job losses.¹⁸ AT&T has addressed those concerns. (*See* Attachment A, hereto.) While some jobs have been lost in these difficult economic times, AT&T California is continuing to invest in California and to add new jobs in growing parts of its business. In each of the past three years, AT&T California has invested approximately \$2.6 *billion* in our California network. AT&T continues to be one of California’s largest corporate employers and the largest employer of union-represented workers. We also continue to add jobs to support growing parts of the business, such as our U-verse video and voice services. Over the past two-and-a-half years, AT&T has added more than 1,700 new jobs in California to support such services.¹⁹

Importantly, AT&T’s U-verse Voice™ product competes directly with nomadic VoIP providers. DRA’s position that the Commission should regulate fixed VoIP providers, even if it cannot regulate nomadic VoIP providers, would give nomadic VoIP providers yet another regulatory and cost advantage. Free from a patchwork of state regulation, nomadic VoIP providers will continue to enjoy a lower cost structure, which they will use to attempt to lure more customers from landline and fixed VoIP providers. Thus, disparate regulatory treatment is likely to drive more customers to nomadic providers, even though nomadic providers do not supply backup power and would not be subject to any Commission customer disclosure requirements. As compared to AT&T, nomadic VoIP providers make no significant investment in California infrastructure or jobs. If DRA is truly concerned about California jobs, it should not advocate an approach that increases the already considerable regulatory advantage enjoyed by nomadic VoIP providers.

¹⁷ *Id.*

¹⁸ DRA Opening Comments at 9.

¹⁹ *See* Attachment A hereto.

Attachment A



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November 19, 2009

President Michael R. Peevey
California Public Utilities Commission
505 Van Ness Avenue, 5th Floor
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Dear President Peevey:

In response to the letter dated October 29, from Senator Padilla and Assemblyman Fuentes, I wanted to provide you with some information and also assure you that AT&T California remains committed to meeting our customer service obligations, as well as those related to public safety.

Despite a very difficult economic climate, AT&T has maintained a robust workforce to meet our customers' needs and expectations, as well as the service quality standards established by the CPUC. Even with a nationwide recession, and significant layoffs in many sectors of the economy (some one million jobs have been lost in California over the past year alone), AT&T is continuing to invest in California and to add new jobs in growing parts of the business. In fact, in each of the past three years we have invested approximately \$2.6 billion in our California network.

Whether expanding or consolidating positions, we manage our operations from both a state and national perspective, and strive to match our workforce to our workload. This enables us to improve our operating efficiencies and to enhance customer service. It also can result in the consolidation of positions to central locations within the state, or to other locations outside of California.

As you know, the telecommunications marketplace in which AT&T competes is changing dramatically, resulting in the need to adjust the number of employees supporting individual lines of our business. Between 2006 and October 2009, AT&T's workforce in California has declined by approximately 11.5% to 43,200 employees. This is largely due to a nearly 22% decline in our access lines in the state over the past three years, and a significant drop in the use of operator services and 411. As a result, the number of operators and technicians needed to support our smaller customer base has correspondingly declined. Despite these reductions, however, we continue to be one of California's largest corporate employers and the largest employer of union-represented workers.

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We also continue to add jobs to support growing parts of the business, such as our U-verse video deployment under DIVCA. In fact, over the past two-and-a-half years, we have added more than 1,700 new jobs in California dedicated to our U-verse video product, as well as close to 700 other new jobs that provide support for U-verse. These include significant increases in our field technicians and engineering staffs.

AT&T California is also committed to meeting its responsibilities with respect to 911 services. Our responsibility for managing 911-related trouble reports resides in the California Major Account Center ("CMAC") located in Sacramento. While process improvements and system mechanization have led to a 10% decrease in staffing levels in this particular unit since August 2008, these changes have also provided integration across AT&T's 22-state footprint resulting in expanded and enhanced 911 network surveillance and monitoring capabilities.

In closing, AT&T California will manage any future force reductions in the same fashion it has in the past and ensure we continue to meet our customers' needs, CPUC standards, and all 911 responsibilities.

Feel free to call if you have further questions or concerns.

Sincerely



Rhonda J. Johnson
Vice President – Regulatory Affairs

cc: Commissioner John Bohn
Commissioner Rachelle Chong
Commissioner Dian Grueneich
Commissioner Timothy Alan Simon
Lester Wong

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **REPLY COMMENTS OF PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T CALIFORNIA (U-1001-C) ON THE ALTERNATE PROPOSED DECISION OF PRESIDENT PEEVEY, MAILED DECEMBER 22, 2009**, on all known parties to **R.07-04-015** by electronic mail, U.S. Mail, and/or hand-delivery.

Executed on this 19th day of January 2010, at San Francisco, California.

AT&T SERVICES, INC.
525 Market Street, 20th Floor
San Francisco, CA 9410

/s/
Agnes Ng

CALIFORNIA PUBLIC UTILITIES COMMISSION

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