



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED

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Order Instituting Rulemaking on the
Commission's Own Motion to Establish
Consumer Rights and Consumer
Protection Rules Applicable to All
Telecommunications Utilities.

Rulemaking 00-02-004
Filed February 3, 2000

**APPLICATION FOR REHEARING OF DECISION 10-10-034 BY
COX CALIFORNIA TELCOM, LLC DBA COX COMMUNICATIONS
AND COX TMI WIRELESS, LLC**

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Pursuant to the Commission’s Rules of Practice and Procedure (“Commission Rules”), Rule 16.1, Cox California Telecom, LLC (U-5684-C) dba Cox Communications and Cox TMI Wireless, LLC (U-4391-C) (together “Cox”) hereby submit this application for rehearing of Decision 10-10-034 (“Decision”).

I. Introduction and Standard of Review.

The Decision adopts rules to be incorporated in General Order 168, Part 4¹ that address the responsibilities and procedures that Billing Telephone Corporations (“BTCs”) must follow and rules that require them to submit quarterly reports with respect to unauthorized charges of Service Providers² included on telephone bills prepared by BTCs. The Decision also adopts a rule that allows certain BTCs to request an exemption from filing such reports. Cox submits this Application to request that the Commission modify Rule 11.6 to apply to services for which a reporting exemption is available and to correct what appears to be an inadvertent omission in the same rule.

The reporting requirements in GO 168, Part 4 are included in Rule 11. For example, Rule 11.1 requires wireless carriers to create a report that lists, on a monthly basis, refunds made to Subscribers with California area codes for charges originated by Service Providers. This rule refers to the report as the “Report of Refunds” and states it must be submitted quarterly.

Rule 11.2 also requires wireless carriers to create a calendar month summary that lists third party services that have been suspended or terminated. This rule refers to the report as the “Report of Suspensions and Terminations” and states that it must be submitted quarterly.

Rule 11.3, on the other hand, applies only to wireline carriers and their respective Billing Agents and requires a report that includes complaints received each month for each Service Provider and Billing Agent. The rule refers to this report as the “Report of Consumer Complaints” and states it must be submitted quarterly.³

¹ All references to “Rules” will be to rules included GO 168, Part 4, as adopted in the Decision.

² “Service Providers” are defined in Rule 2.3 as entities other than BTC: “A person or entity, other than a Billing Telephone Corporation, that originates the charge or charges that are billed to the Subscriber of the Billing Telephone Corporation.”

³ Rules 11.4 and 11.5 also include reporting requirements but these rules are not relevant to this Application.

Importantly, Rule 11.6 includes a process by which certain carriers may request an exemption from filing reports. As will be discussed in greater detail below, this rule is unfair and unreasonably discriminatory in that only a subset of all carriers providing business services may obtain an exemption from the reporting requirement. Rule 11.6 in relevant part states:

The following types of Billing Telephone Corporations may by letter request that the Director of the Consumer Protection and Safety Division suspend or modify their obligation to file the *Report of Refunds and the Report of Suspensions and Terminations*:

- a. Carriers offering wireless services through prepaid or pay in advance methods.
- b. Carriers that provide service *only* to business or wholesale customers.⁴

This Application requests that the Commission modify Rule 11.6 to: (a) include a reporting requirement exemption for services (and not carriers); and (b) add a reference to the “Report of Consumer Complaints” such that wireline carriers may obtain an exemption from submitting such report.

Specifically, Cox requests that the portion of Rule 11.6 cited above be revised as follows:

~~The following types of Billing Telephone Corporations that provide the services below~~ may by letter request that the Director of the Consumer Protection and Safety Division suspend or modify their obligation to file the *Report of Refunds, and the Report of Suspensions and Terminations, and the Consumer Complaint Report*:

- a. ~~Carriers offering~~ wireless services through prepaid or pay in advance methods.
- b. ~~Carriers that provide service only to~~ services to business or wholesale customers.

The Commission should grant this Application as it satisfies the requirements of Commission Rule 16(c) which states as follows:

Applications for rehearing shall set forth specifically the grounds on which the applicant considers the order or decision of the Commission to be unlawful or erroneous, and must make specific references to the record or law. The purpose of an application for rehearing is to alert the Commission to a legal error, so that the Commission may correct it expeditiously.

⁴ Rule 11.6. Emphasis added. The remainder of Rule 11.6 states in full as follows: “The letter request must demonstrate that the specific Billing Telephone Corporation provides the types of services specified and is in compliance with these rules, and that the filing of the report(s) is not necessary to protect Subscribers. The letter should be signed and verified in accordance with Rule 2.4 of the Commission’s Rules of Practice and Procedure. Once an exemption is granted, a Billing Telephone Corporation shall file an annual certification or letter affirming that continued exemption is warranted. The annual certification or letter shall be signed and verified in accordance with Rule 2.4 of the Commission’s Rules of Practice and Procedure.

The Director of the Consumer Protection and Safety Division may grant or deny, in whole or in part, or apply such conditions as may be necessary to protect Subscribers in response to the letter request. The Director of the Consumer Protection and Safety Division may also revoke the exemption for good cause.”

In addition, Section 1757.1⁵ provides that a final Commission decision issued in a quasi-legislative proceeding will be overturned if it is not supported by the findings or if the Commission did not follow the proper process.

Cox demonstrates below that the exemption from reporting requirements in Rule 11.6 is erroneous and unlawful in that it treats wireline carriers offering the same type of services in a discriminatory manner and it does not include a reference to the wireline “Consumer Complaint Report.” Cox also demonstrates that the record fully supports the Commission granting the relief requested herein.

II. Background.

In Decision 06-03-013 (“CPI Decision”), the Commission adopted its comprehensive Consumer Protection Initiative and in doing so adopted a new regulatory role with respect to consumer protection “in the face of swift technological advances.”⁶ Specifically, the Commission rejected one-size-fits-all prescriptive rules and concluded it would dedicate resources to consumer education and enforcement of existing rules. The CPI Decision adopted twenty-three initiatives that would be implemented over time and it also left open for consideration appropriate cramming-related reporting requirements. In the CPI Decision, the Commission directed Staff to conduct a workshop and make recommendations with respect to reporting requirements for unauthorized charges included on the telephone bills as a result of the billing and collection services BTCs provide to entities not subject to the Commission’s jurisdiction.⁷

Staff conducted a workshop, and thereafter, issued a Workshop Report, dated October 13, 2006, in which it outlined several recommendations. Relevant to this Application, the Workshop Report recommended that the Commission adopt two methods through which providers could opt-out of the any reporting requirements:

1. On a monthly-basis, a service provider may opt-out of the monthly reporting requirements by submitting a letter to the Director of CPSD stating that there are no reportable complaints for the subject month. The letter should be signed and verified in accordance with Rule 2.4 of the Commission’s Rules of Practice and Procedure. The letter shall be submitted within 30 days from the month in which the service provider is seeking the exemption from the monthly reporting requirements.

⁵ All section references are to the California Public Utilities Code, unless otherwise stated.

⁶ CPI Decision, p. 1.

⁷ Id., p. 94.

2. On an annual basis, a service provider may also opt-out of the monthly reporting requirements by submitting a letter to the Director of CPSD setting forth specific reasons as to why it should be exempted from the monthly reporting requirements for the entire subject year. The letter should be signed and verified in accordance with Rule 2.4 of the Commission's Rules of Practice and Procedure. The letter shall be submitted by January 30th for the year in which the service provider is seeking the exemption from the reporting requirements.⁸

In the Spring of 2008, Cox and other parties filed comments in support of the proposed opt-out methods or otherwise eliminating the proposed reporting generally.⁹ Two years later in response to the Assigned Commissioner and Assigned Administrative Law Judge's ruling, dated February 12, 2010, parties filed comments supporting an exemption from reporting and/or requesting that the Commission adopt narrowly tailored reporting rules such that an opt-out would not be required.^{10 11} Cox, for example, expressly requested that reporting requirements *not* apply to services that carriers provide under contract.¹² Cox explained that:

⁸ See, Assigned Commissioner and Administrative Law Judge Ruling, pp. 21-22 (dated February 22, 2008).

⁹ See Comments of Cox California Telcom, LLC, dba Cox Communications, On Assigned Commissioner's Ruling Requesting Comment and Briefing on Cramming Reporting Requirements, Dated February 22, 2008, p. 14 (dated April 7, 2008). See Opening Comments of AT&T Communications of California, Inc. (U 5002 C), and New Cingular Wireless PCS, LLC (U 3060 C) (dated April 7, 2008) (arguing that reporting requirements were not necessary and AT&T's comments are based on the assumption that the ACR intends for the proposed rules to apply only to non-business customers); Opening Comments of California Association of Competitive Telecommunications Companies On Assigned Commissioner's Ruling Requesting Comment and Briefing On Cramming Requirements (requesting an exemption for business services, and in the alternative, supporting an annual opt-out); Opening Comments of Surewest and Small LECs On Assigned Commissioner's Ruling Requesting Comment and Briefing on Cramming Reporting Requirements (dated April 7, 2008) (arguing that reporting is not necessary and alternatively supporting the proposed opt-out methods with modifications); Opening Comments of Time Warner Telecom, LP (U-5358-C) (dated April 7, 2008) (requesting an exemption for facilities-based carriers providing service to business customers); Comments of Verizon California, Inc. (U 1002 C) On The Assigned Commissioner's Ruling Requesting Comment and Briefing on Cramming Reporting Requirements (dated April 7, 2008) (requesting that the Commission eliminate existing reporting and not expand reporting requirements); Reply Comments of Astound Broadband, LLC (U-6418 -C) (dated April 28, 2010) (supporting the opening comments of Surewest and the Small LECs).

¹⁰ See Comments of California Association of Competitive Telecommunications Companies On Assigned Commissioner's Ruling Requesting Comments on Proposed California Telephone Corporation Billing Rules (pp. 2-4 (dated March 22, 2010); Opening Comments of tw telecom of california lp (U-5358-C), pp. 1-3 (dated March 22, 2010) (hereafter "tw telecom OC March 2010"); Opening Comments of CBeyond Communications, LLC (U-6446-C) On Assigned Commissioner's Ruling Requesting Comments on Proposed California Telephone Corporation Billing Rules, pp. 1-4 (dated March 22, 2010) (dated "CBeyond OC March 2010").

¹¹ Numerous parties also filed comments that demonstrating that proposed reporting requirements were not necessary and/or should be re-considered after workshops or a more complete record was developed.

¹² Comments of Cox California Telcom, LLC dba Cox Communications, Cox TMI Wireless, LLC and Astound Broadband, LLC On Assigned Commissioner's Ruling Requesting Comments on Proposed California

Again, because BTCs have no incentive to issue incorrect bills and because there is no evidence suggesting that customer obtaining services under contract experience cramming.¹³

Finally, when the Commission issued the initial Proposed Decision earlier this year that included cramming-related and reporting rules for inclusion in GO 168 Part 4 issued, it included an exemption similar to one adopted in the Decision. In response to the PD, however, multiple parties filed comments requesting that the proposed exemption be broadened. For example, Cox filed comments, referring to its and other parties' comments submitted previously, recommending that the exemption apply not only to reporting requirements but to all of the proposed rules. Cox's expressly requested an exemption from *all* reporting for services for which the record reflected little to no risk of cramming:

These rules apply to ~~all~~ Billing Telephone Corporations, except when they provide prepaid wireless service, business services, service to wholesale customers and services to customers under written contract, Billing Agents, and Service Providers doing business in California and specify the responsibilities and procedures for addressing subscribers' allegations of unauthorized charges on telephone bills.¹⁴

Ignoring the comments, the Decision erroneously adopted rules which apply exemptions to certain carriers, rather than on service types, and failed to extend the exemption to all types of reporting.

Reviewing the record as a whole, the Commission reasonably should have found that a carrier may seek an exemption from reporting for the types of services referenced in the Rule 11.6, regardless of whether the carrier also offers services that are not included in such rule. Thus, as described further below, the Decision is erroneous and this Application is proper and should be granted.

III. The Commission Should Revise Rule 11.6 Such That Any Carrier Offering Services Referenced In Such Rule May Request An Exemption Even If Such Carriers Offers Other Types Of Services Not Referenced In Such Rule.

The Rules adopted in the Decision require carriers to submit certain reports and Rule 11.6 allows carriers to request and exemption from such reporting. Specifically, Rule 11.6 allows the following to request that the Director of CPSD suspend or modify their reporting obligations:

Telephone Corporation Billing Rules, dated February 12, 2008, pp. 5-7 (dated March 22, 2010) (hereafter "Cox OC March 2010").

¹³ Id., p. 7.

¹⁴ Cox California Telcom, LLC dba Cox Communications and Cox TMI Wireless, LLC On Proposed Decision of Commissioner Bohn, pp. 14-15 (dated October 4, 2010).

- a. Carriers offering wireless services through prepaid or pay in advance methods.
- b. Carriers that provide service only to business or wholesale customers.

The text in subpart (b) is legally erroneous in that it applies to those carriers who serve *only* business and wholesale customers.¹⁵ The inclusion of the word “only” appears to mean that if a carrier provides services to business customers *and* residential customers, such carrier may not seek an exemption from filing reports for services provided to business customers. To correct this error, provide clear guidance to carriers and to avoid potential confusion and disputes in the future, Cox respectfully requests that the Commission modify the Decision by modifying Rule 11.6 as follows:

~~The following types of Billing Telephone Corporations that provides the services below~~ may by letter request that the Director of the Consumer Protection and Safety Division suspend or modify their obligation to file the *Report of Refunds, and the Report of Suspensions and Terminations, and the Consumer Complaint Report*:

- a. ~~Carriers offering~~ wireless services through prepaid or pay in advance methods.
- b. ~~Carriers that provide service only to~~ services to business or wholesale customers.¹⁶

As adopted, Rule 11.6 is unfair, discriminatory and not consistent with the State’s policies for telecommunications in that it provides an exemption for some – but not all - carriers that provide services to business customers. Specifically, carriers providing *only* business services could request an exemption from reporting and be relieved of the cost and burden of compliance; but a carrier like Cox that provides *both* business and residential services, may not request the reporting exemption with respect to its business customers. The Rule is not lawful because it unreasonably discriminates against some carriers and the Decision does not include any basis for the disparate treatment. Further, it is unreasonably discriminatory because it disadvantages Cox by requiring it to expend resources to develop, implement and maintain a process to comply with a rule but it does not require Cox’s business services competitors to do the same. Again, the Decision provides no explanation as to why Cox should be treated differently than other carriers that provide services to business customers.

¹⁵ Decision, GO 168 Part IV, Rule 11.6. Emphasis added.

¹⁶ Alternatively, the Commission could delete the word “only” in Rule 11.6(b) but Cox submits the proposal above best addresses the issue.

Moreover, the record in the proceeding does not support the Rule as numerous parties commented that the exemption should apply to services, and not carriers.¹⁷ Neither the Decision nor the record as a whole support Rule 11.6 being limited to carriers that provide “only” business services or wholesale customers. In fact, the record in this proceeding clearly supports the Commission adopting the revised rule described herein. As discussed above in Article II, throughout this proceeding Cox and other parties requested that the Commission adopt clear rules concerning the exemption from reporting rules and that such exemption apply to services for which there is little to no risk of cramming.¹⁸

Finally, Rule 11.6 contravenes the pro-competitive policies that the Legislature adopted in Section 709, which provide in part as follows:

(f) To promote lower prices, broader consumer choice, and avoidance of anticompetitive conduct.

(g) To remove the barriers to open and competitive markets and promote fair product and price competition in a way that encourages greater efficiency, lower prices, and more consumer choice.

Rule 11.6 violates these policies because it increases the costs that some carriers offering business service must incur while relieving other carriers offering the same service of such costs. Accordingly, the rule does not promote lower price or consumer choice and it creates, instead of removes, a barrier to open and competitive markets.

For clarity, under the proposed revision to Rule 11.6 above, carriers that provide services to both residential and business customers would not be able to request an exemption from reporting for services

¹⁷ Cox acknowledges that the Decision reflects that tw telecom requested that the exemption apply only to carriers providing to business and wholesale telecommunications services. Decision, p. 17. However, tw telecom’s comments filed throughout this proceeding do not include or emphasize that limitation. For example, in March 2010, tw telecom filed comments that state that the “proposed rules should not apply *business and wholesale customers* just as in-language rules were not applied to business customers.” tw telecom March 2010 OC, p. 2. (Emphasis added). The consumer groups opposed exemptions that carriers proposed for business and wholesale services, but the Commission correctly rejected those comments. As such, to the best of Cox’s knowledge, no party expressly argued in favor of a rule that discriminates among carriers offering business services.

¹⁸ See also Comments of California Association of Competitive Telecommunications Companies On Proposed Decision Adopting California Telephone Corporation Billing Rules, pp. 2-3 (dated October 4, 2010); Comments of Cricket Communications, Inc. (U-3076-C) And MetroPCS of California, LLC (U-3079-C) On The Proposed Decision, pp. 4-7 (dated October 4, 2010); Opening Comments of Small LECs On The Proposed Decision Adopting California Telephone Corporation Billing Rules (dated October 4, 2010); Opening Comments of tw telecom of California, lp Concerning Proposed Decision of Commissioner Bohn (dated October 4, 2010).

provided to residential customers. The requested revision ensures that the exemption is available to carriers that provide services for which the Commission has concluded there is little to no risk of cramming. Accordingly, Cox respectfully requests that the Commission modify Rule 11.6 so that any carrier providing services that are not subject to cramming may seek the applicable reporting exemption, even though any such carrier may also provide services not subject to the exemption.

IV. The Commission Should Add To Rule 11.6 A Reference To The “Report of Consumer Complaints.”

As adopted, Rule 11.6 clearly grants both wireline carriers and wireless carriers the option of seeking an exemption from reporting in that it refers to “Carriers offering wireless services” and “Carriers that provide service only to business and wholesale customers.”¹⁹ However, the rule references only the reports that wireless carriers must file. It appears that the reference to the “Report of Consumer Complaints” that wireline carriers must file was inadvertently omitted which necessarily makes the exemption meaningless for such carriers.

The Commission can easily remedy this inadvertent error by adding a reference to the “Report of Consumer Complaints” at the end of the first sentence in Rule 11.6 as follows:

The following types of Billing Telephone Corporations may by letter request that the Director of the Consumer Protection and Safety Division suspend or modify their obligation to file the Report of Refunds, ~~and~~ the Report of Suspensions and Terminations and the Report of Consumer Complaints.

V. Conclusion.

For all the reasons described above, Cox respectfully requests that the Commission grant this Application and modify Rule 11.6 as proposed herein.

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¹⁹ Rule 11.6.

Dated: December 2, 2010

Respectfully submitted,

/s

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CERTIFICATE OF SERVICE

I, Margaret L Tobias, the undersigned, hereby declare that, on December 2, 2010, caused a copy of the foregoing:

**APPLICATION FOR REHEARING OF DECISION 10-10-034 BY
COX CALIFORNIA TELCOM, LLC DBA COX COMMUNICATIONS
AND COX TMI WIRELESS, LLC**

in the above-captioned proceeding, to be served as follows:

- [X] Via US Mail to each Commissioner
- [X] Via email service to Commissioners' advisors
- [X] Via email service and US Mail to the Administrative Law Judge
- [X] Via email service to all parties included in the attached service

Dated: December 2, 2010, at San Francisco, California.

/s

Margaret L. Tobias

Proceeding: R0002004 - CPUC - OIR TO ESTABL

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