

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

05-22-13
04:59 PM

Order Instituting Rulemaking Regarding
Revisions to the California High Cost
Fund B Program.

R.09-06-019

**JOINT COMMENTS OF AT&T, COX CALIFORNIA TELECOM, LLC, TURN,
VERIZON, HAPPY VALLEY, HORNITOS AND WINTERHAVEN TELEPHONE COMPANIES
D/B/A TDS TELECOM, FRONTIER, DIVISION OF RATEPAYER ADVOCATES, AND
CALTEL ON CBG MAPPING DATA UPDATE**

Margaret L. Tobias
Tobias Law Office
460 Pennsylvania Avenue
San Francisco, CA 94107
Tel: 415.641.7833
E-Mail: marg@tobiaslo.com
Attorney for Cox Communications

David P. Discher
AT&T Services, Inc.
525 Market Street, Suite 2027
San Francisco, CA 94105
Tel.: (415) 778-1464
E-Mail: david.discher@att.com
Attorney for AT&T

Christine Mailloux
William Nusbaum
TURN-The Utility Reform Network
115 Sansome Street, Suite 900
San Francisco, CA 94104
Telephone: 415-929-8876
E-mail: bnusbaum@turn.org

Jesús G. Román
Verizon California Inc.
2535 West Hillcrest Dr.
Newbury Park, CA 91320
Tel: (805) 499-6832
E-Mail: jesus.g.roman@verizon.com
Attorney for Verizoni

Phyllis A. Whitten
9260 E. Stockton Blvd.
Elk Grove, California 95624
Telephone: 916-686-3570
E-mail: Phyllis.Whitten@ftr.com
Attorney for Fronter

Laura E. Gasser
Division of Ratepayer Advocates-CPUC
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2169
E-Mail: laura.gasser@cpuc.ca.gov
Attorney for DRA

Patrick Rosvall
Mark Schreiber
Cooper, White & Cooper LLP
201 California St, 17th Flr
San Francisco, CA 94111
Tel: 415-433-1900
E-mail: Phyllis.Whitten@ftr.com
Attorney for the Small LECS

Richard H. Levin
Attorney at Law
130 South Main St., Ste. 202
P.O. Box 240
Sebastopol, CA 95473-0240
Tel: 707.824.0440
E-Mail: rl@comrl.com
Attorney for CALTEL

May 22, 2013

Pursuant to the Administrative Law Judge’s Ruling dated April 5, 2013, and subsequent ruling of April 23, 2013 extending the time for these comments, AT&T (U 1001 C), Cox California Telecom, LLC (U 5684 C), TURN, Verizon (U 1002 C), Citizens Telecommunications Company of California Inc. (Frontier) (U 1020 C), Division of Ratepayer Advocates (“DRA”), Happy Valley Telephone Company (U 1010 C), Hornitos Telephone Company (U 1011 C) and Winterhaven Telephone Company (U 1021 C) d/b/a TDS Telecom, and CALTEL hereby describe their joint consensus on the methodologies and algorithms necessary to implement the mapping data update.

I. Consensus Approach to Mapping Data Update

As recognized in the Assigned Commissioner’s Ruling and Amended Scoping Memo of January 29, 2013, the current B-Fund support is based on the data from the 1990s. Specifically, 1990 census data were used to identify B-Fund support areas. Census data from 2010 is now available, and the Amended Scoping Memo identified the first step to be undertaken is to update the statewide CBG mapping data based on 2010 census in comparison to the 1990 census data.¹

In the workshop held on March 27, 2013, to discuss a methodology to update the mapping data, AT&T described a process that would take the 1990 households and map them into 2010 CBGs, and also proposed including their associated costs as determined by the Commission in 1996.² After the workshop, AT&T then undertook the updating of the mapping, utilizing a vendor, GeoLytics. A call occurred April 12, 2013, during which the parties discussed this mapping process, and TURN provided further written questions.

After the methodologies were employed and results generated which AT&T distributed to the other parties, interested parties participated on another call on April 24, 2013. At that

¹ See Assigned Commissioner’s Ruling and Amended Scoping Memo, Ruling Paragraph 3.

² While such cost information is included in the Attachments referenced below and attached hereto, that information is not part of the consensus proposal, but may be part of a future submission.

time, the parties went over the statewide results and detailed results for Yuba and Mono counties. AT&T, TURN, Verizon, Happy Valley, Hornitos and Winterhaven Telephone Companies d/b/a TDS Telecom, Frontier, DRA and CALTEL all agreed that this methodology resulted in a reasonable process to map the 1990 households into CBGs from the 2010 census. The results for Mono and Yuba counties are included in the Microsoft Excel spreadsheets in Attachments 1 and 2 respectively. The tab “GeoLytics Methodology” in each of those attachments provides detailed descriptions of the methodologies used by GeoLytics to achieve the re-mapping. The statewide results are provided in Attachment 3, and Attachment 4 contains a description of the various tabs in the statewide results. Attachment 5 contains questions regarding Mono County that were posited by TURN.

While all households in CBGs from 1990 were mapped to CBGs from the 2010 census, not all of the 1990 CBGs had support amounts assigned to them since many areas were not part of the original companies included in the CHC-B program in D.96-10-066. At the time the CHCF-B program only included the existing large and mid-sized New Regulatory Framework local exchange carriers. Therefore, if there are 2010 CBGs now, or become, served by companies eligible to receive support from the B-Fund (as compared to CHCF-A fund), a process for determining the level of CHCF-B support for those areas, if any, such as a proxy or other agreed upon method, will have to be addressed as one of the next procedural steps in this proceeding because no cost data exists in such a situation and it is premature to assume that the average default cost of \$17.77 is or is not a reasonable default.

II. Conclusion

The parties identified herein have reached consensus that the attached results and methodologies reasonably re-map 1990 households from their 1990 CBGs to CBGs based on the 2010 census. The parties also agree that a workshop to discuss either this consensus, if needed, or next steps would be advisable.

Dated: May 22, 2013

Respectfully submitted,

/s/

DAVID P. DISCHER

AT&T Services, Inc.
525 Market Street, Suite 2027
San Francisco, CA 94105
Tel.: (415) 778-1464
Fax: (415) 543-0418
E-Mail: david.discher@att.com

Attorney for AT&T