



FILED
7-11-16
04:59 PM

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

1

Order Instituting Investigation on the Commission’s Own Motion Into the Planned Purchase and Acquisition by AT&T Inc. of T-Mobile USA, Inc., and its Effect on California Ratepayers and the California Economy	Investigation 11-06-009 (Filed June 9, 2011)
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INTERVENOR COMPENSATION CLAIM OF THE CENTER FOR ACCESSIBLE TECHNOLOGY AND DECISION ON INTERVENOR COMPENSATION CLAIM OF CENTER FOR ACCESSIBLE TECHNOLOGY

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Claimant: Center for Accessible Technology	For contribution to D. 12-08-025
Claimed (\$): \$23,014.17	Awarded (\$):
Assigned Commissioner: Sandoval	Assigned ALJ: Jessica T. Hecht
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
Signature:	
Date: 10/12/12	Printed Name: Melissa W. Kasnitz

PART I: PROCEDURAL ISSUES (to be completed by Claimant except where indicated)

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A. Brief Description of Decision:	Decision dismissed proceeding as moot, while finding that it is reasonable for otherwise-eligible parties to request intervenor compensation.
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B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

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	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	N/A	

2. Other Specified Date for NOI:	September 6, 2011 (specified in Ordering Paragraph 18 of the OII)	
3. Date NOI Filed:	September 7, 2011, immediately following receipt of an email ruling that CforAT's then- pending Motion for Party Status was granted. See comment below. The final decision indicates that CforAT's NOI was timely filed. (Decision at p. 11).	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	No formal ruling has been issued on CforAT's NOI in this proceeding. CforAT has established its customer status in other proceedings; <i>see e.g.</i> ALJ Ruling in A.10-03-014.	
6. Date of ALJ ruling:	ALJ Ruling in A.10- 03-014, issued on October 31, 2011	
7. Based on another CPUC determination (specify):		
8. Has the Claimant demonstrated customer or customer-related status?		
Showing of "significant financial hardship" (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	In this proceeding, the Final Decision notes that CforAT has a rebuttable presumption of significant financial hardship. Decision at	

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	pp. 11-12. A showing of significant financial hardship was found in A.10-03-014.	
10. Date of ALJ ruling:	See ALJ Ruling in A.10-03-014, issued on October 31, 2011.	
11. Based on another CPUC determination (specify):		
12. Has the Claimant demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.12-08-025	
14. Date of Issuance of Final Order or Decision:	8/29/12	
15. File date of compensation request:	10/12/12	
16. Was the request for compensation timely?		

C. Additional Comments on Part I (use line reference # as appropriate):

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#	Claimant	CPUC	Comment
4.3	CforAT		CforAT's Motion for Party Status, filed on August 22, 2012, was granted in an email ruling on September 7, 2012. While no formal ruling ever followed, CforAT has been addressed as a party throughout all subsequent proceedings, and is acknowledged to be eligible to seek intervenor compensation at pages 11-12 of the final decision.

PART II: SUBSTANTIAL CONTRIBUTION (to be completed by Claimant except where indicated)

A. In the fields below, describe in a concise manner Claimant's contribution to the final decision (see § 1802(i), § 1803(a) & D.98-04-059). (For each contribution, support with specific reference to the record.)

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Contribution	Specific References to Claimant's Presentations and to Decision	Showing Accepted by CPUC
1. As noted in the final decision, the proponents of the merger that was the subject of this investigation moved to dismiss the proceeding following their decision to terminate their merger efforts.	Final Decision at pp. 9-11.	

<p>This followed several months of concentrated effort to move the merger forward, including work by intervening parties to assist the Commission in its effort to evaluate the proposed transaction.</p> <p>As part of the Commission’s review, it requested substantial information about the proposed transaction, and parties to the proceeding expended substantial effort to respond to these inquiries.</p> <p>Eventually, when the parties to the proposed merger decided to discontinue the transaction, based on circumstances outside the record of this proceeding, the efforts of the parties and the Commission became moot, and the proceeding was terminated without a determination on the merits regarding the proposed merger.</p>		
<p>2. While dismissing the proceeding as moot, the Commission properly noted that “parties spent considerable time developing a record related to respondents’ products, services, pricing, outreach, facilities and other issues.” This includes responding to issues that were directly raised by the Commission in the Administrative Law Judge’s Ruling Requesting Additional Information and Addressing Various Procedural Issues, issued on August 11, 2011 (August 11 ALJ Ruling).</p>	<p>Final Decision at p. 10, <i>see also</i> August 11 ALJ Ruling at pp. 6-10, setting forth 11 questions for parties to address.</p>	
<p>3. Among the questions specifically raised by the Commission in the August 11 ALJ Ruling was the issue of potential mitigation measures that might ameliorate concerns about whether the proposed merger would serve the public interest. This issue of mitigation measures (specifically measures that might mitigate the impact of the potential merger on the disability community) was the focus of CforAT’s participation in the proceeding.</p>	<p>August 11 ALJ Ruling at pp. 9-10 (Question 11, including subparts a-j); <i>see also</i> CforAT’s NOI, filed on September 7, 2011 indicating that CforAT intended to address the issue of mitigation, and CforAT’s substantive comments and supporting expert declaration, filed on August 22, 2011, addressing the need for mitigation regarding issues affecting the disability community.</p>	
<p>4. Because CforAT’s substantive contributions were directly responsive to questions raised in the August 11 ALJ</p>	<p>Compare Question 11 of August 11 ALJ Ruling, including subparts a-j, with issues addressed in CforAT’s substantive</p>	

Ruling and assisted in building the record in this proceeding, CforAT's participation was reasonable and should be compensated.	comments and supporting expert declaration, filed on August 22, 2011.	
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

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	Claimant	CPUC Verified
a. Was the Division of Ratepayer Advocates (DRA) a party to the proceeding?	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
<p>c. If so, provide name of other parties: Parties who were opposed to the merger or who sought conditions and/or mitigation measures as part of any determination that the merger should be allowed to go forward included: The Utility Reform Network; the Greenlining Institute; the Latino Business Chamber of Greater Los Angeles, the National Asian American Coalition and the Black Economic Council (jointly); the Utility Consumers' Action Network, and Phillip Moskal.</p> <p>Additional parties to the proceeding included the proponents of the proposed merger, AT&T and T-Mobile, as well as other carriers and associations representing the interests of carriers, and the Communication Workers of America, District 9.</p>		
<p>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party: The Center for Accessible Technology was the only party to address concerns about the way in which the proposed merger might impact the uniquely vulnerable community of people with disabilities, and to address potential mitigation measures to address these concerns if the merger were to be allowed to proceed. CforAT did not seek to address issues where other parties had greater expertise.</p>		

C. Additional Comments on Part II (use line reference # or letter as appropriate):

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#	Claimant	CPUC	Comment

PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Claimant except where indicated)

A. General Claim of Reasonableness (§§ 1801 & 1806):

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a. Concise explanation as to how the cost of Claimant's participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)	CPUC Verified
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<p>The only substantive issue addressed by CforAT was mitigation (specifically, “mitigation to address potential harms to customers with disabilities that might flow from the proposed merger. In particular, CforAT is addressing issues concerning effective communication with disabled customers, service quality and reliability, accessibility of telecommunications equipment such as wireless handsets, and affordability” CforAT NOI at p. 3). This was directly responsive to Question 11, regarding potential mitigation measures, in the August 11 ALJ Ruling. While there was no substantive decision on the merits of the proposed merger, the modest costs incurred by CforAT to develop a record of appropriate mitigation measures to ensure that a vulnerable population which would have faced unique impacts had the merger moved forward, benefited the Commission as it prepared to consider the impact of the proposed merger on the citizens of California.</p>	
<p>b. Reasonableness of Hours Claimed.</p> <p>The total amount of time claimed by CforAT is modest, and represents CforAT’s focused effort on an issue where it was uniquely placed to provide information specifically requested by the Commission regarding potential mitigation for a vulnerable community. In addition to this specific contribution, CforAT monitored the complex proceeding to evaluate where it could make additional contributions, while keeping time spent on this effort constrained.</p> <p>CforAT’s final request is well below the estimates set forth in its NOI, which anticipated that the organization would expend 60 hours of attorney time and 30 hours of expert time on this proceeding. Because no final decision on the merits was reached, CforAT spent only very modest amounts of time reviewing the proposed decision and comments, and did not make any substantive filings during that portion of the proceeding.</p>	
<p>c. Allocation of Hours by Issue</p> <p>As noted above, the only substantive issue addressed by CforAT was mitigation. All time for spent by CforAT’s internal experts was spent on mitigation. For counsel, time was divided between mitigation and general participation (GP). Because of the need to review frequent filings, the portion of counsel’s time spent on general participation was relatively high; this was needed in order to follow the proceeding as it moved forward. CforAT’s counsel did not seek to conduct a detailed review of filings that did not directly impact issues of concern to the organization’s constituency, and thus spent relatively modest amounts of time reviewing documents considering the volume of material that was part of the record in this proceeding.</p> <p>A small number of counsel’s time entries cannot easily be separated into</p>	

Postage	Mailed hard copies of substantive filings.	\$11.92	
Subtotal:		\$11.92	Subtotal:
TOTAL REQUEST \$:		\$23,014.17	TOTAL AWARD \$:

When entering items, type over bracketed text; add additional rows as necessary.

*If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.

**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer's normal hourly rate.

C. Attachments Documenting Specific Claim and Comments on Part III (Claimant completes; attachments not attached to final Decision):

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Attachment or Comment #	Description/Comment
1	Certificate of Service
2	Detailed Time Records: 2011 Merits
3	Detailed Time Records: 2012 Merits
4	Detailed Time Records: 2011 Comp Time
5	Detailed Time Records: 2012 Comp Time
6 (Comment)	<p>Requested 2011 Rate for Melissa W. Kasnitz</p> <p>In D.12-03-051, the Commission set a rate of \$420 per hour for Melissa Kasnitz for her work at her prior organization, Disability Rights Advocates. Ms. Kasnitz has previously requested that the same rate be awarded for work at CforAT, in compensation requests pending in A.10-03-014, A.08-12-021, and in R.10-02-005. No action has yet been taken on any of these requests.</p>
7(Comment)	<p>Requested 2012 Rate for Melissa W. Kasnitz</p> <p>In compensation requests pending in A.08-12-021 and R.10-02-005, Ms. Kasnitz sought an increase in her rate for 2012 from \$420 per hour to \$435 per hour (Ms. Kasnitz did not ask for any time to be compensated at 2012 rates in CforAT's pending request in A.10-03-014). These requests were submitted before any action was taken on Resolution ALJ-281, issued on September 18, 2012, which adopted intervenor rates for 2012.</p> <p>Resolution ALJ-281 approved a 2.2% cost of living adjustment (COLA) for intervenor rates in 2012. Applying this increase to Ms. Kasnitz's 2011 rate of \$420 per hour would set a 2012 rate of \$430 per hour (2.2% of \$420 is \$9.24, which is then rounded to a \$10/hr increase), which is well within the rate range specified for attorneys with 13+ years of experience.</p> <p>Ms. Kasnitz, who graduated law school in 1992 and thus has 20 years of experience, including substantial experience practicing before the Commission, has used both available step increases for the 13+ year range. In her prior pending compensation requests that include time for 201, however, Ms. Kasnitz has explained why a rate increase of \$15 per year is appropriate, separate from any determination by the Commission regarding the availability of a COLA.</p> <p>Specifically, in the pending compensation requests in A.08-12-021 and R.10-02-005, CforAT argued that:</p> <p style="padding-left: 40px;">This increase in Ms. Kasnitz's rate for 2012 is justified. Ms. Kasnitz graduated law</p>

	<p>school in 1992; in 2012 she is an experienced practitioner with substantial expertise representing people with disabilities and with a history of effective representation at the Commission. Nevertheless, her rate has been unchanged since 2008, and since she first entered the most experienced rate range of commission intervenors in 2005, at 13 years of experience, she has received only minimal step increases. Thus, while Ms. Kasnitz has substantially more than the minimum level of experience in the 13+ year range, her rate does not reflect this experience. Of course, more junior practitioners have ongoing opportunities to seek increases as they rise in experience levels, and they have multiple opportunities to seek step increases in each experience range. All that this request seeks is a similar opportunity for the most experienced practitioners to obtain a modest rate increase.</p> <p>Ms. Kasnitz is aware that no cost of living increases have been authorized since 2008 (though no resolution has issued specifically for 2012). The increase sought here is different. If an experienced practitioner with 20 years of legal experience but no established rate before the Commission sought intervenor compensation for the first time, Resolution ALJ 267 indicates that the attorney would be eligible for a rate between \$300 and \$535 per hour. A rate of \$435, just above the midpoint of the rate range, would easily be found reasonable for such a practitioner.</p> <p>While there is no directly comparable practitioner to use as a model, CforAT points to Tom Long of TURN. According to the Commission’s rate chart, available at http://www.cpuc.ca.gov/NR/rdonlyres/991AE44F-B4CD-4133-A2C0-17BF4C0F849C/0/Intervenors_Hourly_Rates.pdf, Mr. Long’s rate was set at \$300 in 2000 (established in D.01-08-011) as an attorney for TURN. Subsequent to that, Mr. Long left TURN and has not had a rate set as an intervenor since that time. In 2011, however, Mr. Long returned to TURN. In an NOI submitted in A.11-06-007 on June 6, 2011, Mr. Long indicated that he would be requesting a rate of \$510.*</p> <p>Ms. Kasnitz had a rate of \$300 in 2004, four years later than the same rate for Mr. Long. Based on her experience since that time, a rate of \$435 is reasonable, and CforAT respectfully requests that such rate be set for 2012.</p> <p>CforAT continues to believe that these same factors remain in place notwithstanding the new resolution providing for a COLA, and that Ms. Kasnitz is eligible to seek this additional increase consistent with the provision of Resolution ALJ-281 which allows practitioners to request increases greater than those generally adopted. ALJ-281 at pp. 5-6. Thus, Ms. Kasnitz seeks approval of a rate of \$445 per hour, which includes a \$10 increase based on the approved COLA and an additional \$15 increase based on the previously submitted analysis.</p> <p>* In fact, TURN has requested a 2011 rate for Mr. Long of \$520 per hour. See TURN’s pending Intervenor Compensation Request in A.09-10-013, filed on February 17, 2012.</p>
8(Comment)	<p>Requested 2011 rate for Dmitri Belser:</p> <p>CforAT previously requested a 2011 rate of \$225 per hour for Dmitri Belser in its compensation request in A.10-03-014, submitted on May 3, 2012; no action has yet been taken on that pending request.</p> <p>As described in the earlier compensation request, Mr. Belser is the Executive Director of the Center for Accessible Technology, and he has frequently served as an expert witness in CPUC proceedings addressing effective communication with people with disabilities, previously engaged by Disability Rights Advocates, and now as CforAT’s in-house expert.</p>

	<p>Mr. Belser’s last approved rate before the CPUC was \$125 per hour for work performed in 2008, which was the rate he was then billing clients of CforAT. <i>See</i> D.09-10-025. This rate was unchanged since 2006. <i>See</i> D.08-01-033; <i>see also</i> D.11-07-024, D.09-03-018. In 2011, based on an understanding that his prior rate was well below the market rate charged by other access experts working in similar areas, Mr. Belser raised his rate to \$225 per hour.</p> <p>As noted in Mr. Belser’s testimony in this and other proceedings, Mr. Belser has over 30 years of experience working in the disability community, with a great deal of focus on issues of effective communication. He has led CforAT for 12 years, and has been the president of the Ed Roberts Campus, designed as a hub for a variety of organizations serving the disability community in Berkeley and a center for disability rights. His expertise has never been challenged in this, or any other proceeding.</p> <p>In 2011, the CPUC’s approved rate range for experts with any amount over 13 years of experience was \$155 - \$390 (<i>see</i> Resolution ALJ-267 at p. 5); the rate of \$225 per hour sought for Mr. Belser is well within that range. The proposed new rate is also now consistent with the rates that other access experts charge for comparable work. For example, Gregg Vanderheiden is an expert on accessible technology, particularly involving self-service kiosks, and he is the head of the Trace Research Center at the University of Wisconsin at Madison. His regular hourly rate that he charges to consult on access issues is \$300 per hour. Another technology access organization, the Paciello Group, provides professional consulting, technology solutions, and monitoring services to help government agencies, technology vendors, e-commerce corporations, and educational institutions provide technology access. The hourly rate for services from the Paciello Group is \$262 per hour.</p> <p>Experts addressing internet accessibility often charge lower rates for evaluation and remediation work, but charge up to \$350 per hour for senior staff. In its work for private clients addressing web access, CforAT charges a blended rate of \$185 per hour regardless of who is performing the work. This is consistent with a rate of \$225 for Mr. Belser, as the most senior person on the team, together with lower rates for the more junior staff.</p>
<p>9(Comment)</p>	<p>Requested 2011 rate for Jon Mires:</p> <p>Jon Mires serves as CforAT’s Web Access Specialist. In this proceeding, he spent a very limited amount of time briefly reviewing the accessibility of the websites of the carriers that were proposing to merge and reporting on his findings. This is the work he performs on a daily basis at CforAT.</p> <p>Since 2007, Mr. Mires has worked for CforAT providing web accessibility evaluations, trainings for groups and individuals, and consulting to web developers trying to implement web accessibility guidelines. He has a Bachelor's degree (2001) from Stanford University and a Master's degree (2006) from George Mason University. As a regular part of his work, he evaluates website accessibility and reports on accessibility barriers, including general overviews and detailed evaluations depending on the scope of a project at issue.</p> <p>When CforAT is engaged as a consultant to address web access, Mr. Mires’ time is regularly billed at \$185 per hour, the rate requested here for the same work. As noted above in the discussion of Dmitri Belser’s rate, this rate is incorporated into a blended rate for all of CforAT’s staff. An hourly rate of \$185 is both the blended overall rate for CforAT and the individual rate for Jon Mires because Jon Mires does the substantial majority of all web access work, supplemented by Dmitri Belser who would charge at a higher separate rate, and by additional junior and support staff, who would charge at a lower separate rate. Examples of</p>

	<p>clients of CforAT who pay this rate include Anthem Healthcare, Groove 11 and Primitive Logic.</p> <p>The proposed rate of \$185 per hour, the actual rate paid by clients of CforAT, is also within the rate range set out for experts with 6years of experience in Resolution ALJ-267, which controls expert rates for 2011.</p>
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D. CPUC Disallowances, Adjustments, and Comments (CPUC completes):

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#	Reason

PART IV: OPPOSITIONS AND COMMENTS
 Within 30 days after service of this Claim, Commission Staff
 or any other party may file a response to the Claim (see § 1804(c))

(CPUC completes the remainder of this form)

A. Opposition: Did any party oppose the Claim?	
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If so:

Party	Reason for Opposition	CPUC Disposition

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(2)(6))?	
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If not:

Party	Comment	CPUC Disposition

FINDINGS OF FACT

1. Claimant [has/has not] made a substantial contribution to Decision (D.) _____.
2. The requested hourly rates for Claimant’s representatives [,as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [,as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable contribution is \$ _____.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Public Utilities Code §§ 1801-1812.

ORDER

1. Claimant is awarded \$ _____.

2. Within 30 days of the effective date of this decision, _____ shall pay Claimant the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Claimant their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated.”] Payment of the award shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning _____, 200__, the 75th day after the filing of Claimant’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

Melissa Kasnitz, 2011 Merits Time
AT&T/T-Mobile Merger
A.11-06-009

Date	Activity	Time	Rate	Value	Issue
08/16/11	Review OII, party filings, and ruling setting schedule/requesting information; notes re: same and issues relevant to the disability community, esp. mitigation	2.5	\$420.00	\$1,050.00	Mix
08/16/11	Email exchange w/ B. Nusbaum (TURN) re: requested schedule extension	0.1	\$420.00	\$42.00	GP
08/16/11	t/c B. Nusbaum (TURN) re: status of proceeding, potential role for CforAT, particularly regarding mitigation issues	0.4	\$420.00	\$168.00	Mix
08/16/11	Draft Motion for Party Status	1.2	\$420.00	\$504.00	GP
08/16/11	Email exchange w/ D. Belser re: impact of proposed merger on people with disabilities and potential for pursuing mitigation	0.5	\$420.00	\$210.00	Mitigation
08/17/11	Review past merger decisions (ATT/SBC and Vz/MCI) re: mitigation; notes re: mitigation issues to propose; review workshop transcripts re: same	1.5	\$420.00	\$630.00	Mitigation
08/18/11	Review TURN Motion for extension & filings in support	0.2	\$420.00	\$84.00	Mitigation
08/19/11	Review and edit initial draft of testimony from D. Belser; extensive email exchange w/ D. Belser re: same	3.7	\$420.00	\$1,554.00	Mitigation
08/19/11	Review TURN and Greenlining filings (opening briefs) re: issues relevant to the disability community and shared concerns; notes re: same	1.0	\$420.00	\$420.00	Mix
08/20/11	Draft Comments and revise draft testimony; email exchange w/ D. Belser re: same	4.2	\$420.00	\$1,764.00	Mitigation
08/20/11	Review past decisions funding CETF re: recommendations for mitigation funding	0.6	\$420.00	\$252.00	Mitigation

Total:	
Hours	37.9
Value	\$ 15,918.00

08/21/11	Revise comments and supporting testimony; update same per email exchange and information provided by D. Belser.	5.2	\$420.00	\$2,184.00	Mitigation
08/22/11	Finalize Belser Testimony	2.5	\$420.00	\$1,050.00	Mitigation
08/22/11	Finalize Comments	2.5	\$420.00	\$1,050.00	Mitigation
08/22/11	Finalize Motion for Party Status	0.3	\$420.00	\$126.00	GP
08/22/12	Review TURN and Greenlining comments	1.0	\$420.00	\$420.00	GP
08/23/12	Review party comments; notes re: same	2.5	\$420.00	\$1,050.00	GP
08/31/12	Review media reports re: DOJ lawsuit to block merger & Commission ruling suspending schedule	0.2	\$420.00	\$84.00	GP
09/01/11	Review information re: federal lawsuit & impact on pending proceeding	0.2	\$420.00	\$84.00	GP
09/01/11	Review Ex Parte Notices	0.2	\$420.00	\$84.00	GP
09/02/11	Review ALJ email re: revisions to schedule; update calendar	0.2	\$420.00	\$84.00	GP
09/06/11	Review TURN Ex Parte Notice	0.1	\$420.00	\$42.00	GP
09/08/11	Review TURN request for notice of DOJ complaint	0.1	\$420.00	\$42.00	GP
09/08/11	Review TURN letter re: economic model	0.1	\$420.00	\$42.00	GP
09/12/11	Conf. w/ E. Gallardo (Greenlining) re: status of proceeding following DOJ complaint, ex parte meetings and next steps	0.3	\$420.00	\$126.00	Mix
09/14/11	Review T-Mobile's compliance filings	0.1	\$420.00	\$42.00	GP
09/14/11	Review ATT Ex Parte Notice (answer to DOJ Complaint)	0.2	\$420.00	\$84.00	GP
09/15/11	Review para. 1 compliance filing by AT&T	0.1	\$420.00	\$42.00	GP
09/15/11	Review decision amending OII re: scheduling authority	0.1	\$420.00	\$42.00	GP
09/16/11	Review compliance filings	0.3	\$420.00	\$126.00	GP
09/19/11	Review ALJ ruling	0.2	\$420.00	\$84.00	GP
09/22/11	Review ALJ ruling re: procedural issues	0.2	\$420.00	\$84.00	GP
09/27/11	Email exchange w/ B. Nusbaum (TURN) re: status of merger	0.2	\$420.00	\$84.00	GP
09/28/11	Brief review of recent compliance filings	0.3	\$420.00	\$126.00	GP

09/28/11	Review ATT Ex parte notice (filed 9/27) and attachments	0.3	\$420.00	\$126.00	GP
10/06/11	Review CalTel ex parte notice re: mitigation & backhaul	0.2	\$420.00	\$84.00	GP
10/10/11	Review Compliance filings	0.2	\$420.00	\$84.00	GP
10/20/11	Brief review of recent compliance filings	0.3	\$420.00	\$126.00	GP
10/25/11	Review CalTel ex parte notice, 10/21 Sprint ex parte notice	0.2	\$420.00	\$84.00	GP
10/31/11	Brief review of recent compliance filings	0.3	\$420.00	\$126.00	GP
11/01/11	Review Ex Parte Notice from Greenlining	0.2	\$420.00	\$84.00	GP
11/15/11	Review ATT letter to Commissioner Sandoval	0.1	\$420.00	\$42.00	GP
11/16/11	Review ALJ ruling establishing deadlines	0.2	\$420.00	\$84.00	GP
11/18/11	Review recent ex parte notices	0.3	\$420.00	\$126.00	GP
11/26/11	Review media accounts re: withdrawal/end of merger; investigate same	0.5	\$420.00	\$210.00	GP
11/29/11	Review recent ex parte notices and compliance filings	0.3	\$420.00	\$126.00	GP
12/01/11	Review FCC Report & position re: other disability organizations	0.3	\$420.00	\$126.00	GP
12/12/11	Review comments re: economic analysis	0.3	\$420.00	\$126.00	GP
12/12/11	Review motion to stay proceeding	0.2	\$420.00	\$84.00	GP
12/13/11	Review DRA motion to hold proceeding in abeyance	0.2	\$420.00	\$84.00	GP
12/14/11	Review ATT response to DRA motion	0.2	\$420.00	\$84.00	GP
12/15/11	Review email suspending deadlines & ruling on NOI	0.1	\$420.00	\$42.00	GP
12/16/11	Email exchange w/ B. Nusbaum (TURN) re: closing vs. suspending proceeding	0.2	\$420.00	\$84.00	GP
12/20/11	Review reports re: termination of merger proposal	0.2	\$420.00	\$84.00	GP
12/22/11	Review motion to dismiss proceeding	0.1	\$420.00	\$42.00	GP

Dmitri Belser, Executive Director

AT&T/T-Mobile Merger, A.11-06-009

DATE	ACTIVITY	TIME	RATE	VALUE
8/16/11	Email exchange w/ M. Kasnitz re: proposed merger, potential impact on people with disabilities, and potential need for targeted mitigation	.3	\$225	\$67.50
8/16/11	Research information on prior mergers, impact on disability community & mitigation	1.0	\$225	\$225.00
8/16/11	Review draft motion for party status; draft section on mitigation	.6	\$225	\$135.00
8/19/11	Prepare draft declaration; review materials re: same	4.5	\$225	\$1012.50
8/19/11	Extensive email exchange w/ M. Kasnitz re: clarifications on draft testimony and revisions re: same	1.7	\$225	\$382.50
8/20/11	Draft/revise section of comments on mitigation & supporting declaration, additional research re: same; email exchange w/ M. Kasnitz re: same	2.8	\$225	\$630.00
8/21/11	Review FCC Materials re: declaration & comments	1.5	\$225	\$337.50
8/21/11	Review revised draft comments and testimony; edit same; email exchange w/ M. Kasnitz re: same	1.0	\$225	\$225.00
8/21/11	Research issue re: low-vision population and identification as disabled; email to M. Kasnitz re: same	.5	\$225	\$112.50
8/22/11	Final review of Declaration and comments	1.0	\$225	\$225.00
TOTALS:		14.9		\$3,352.50

Jon Mires, Web Access Specialist
AT&T/T-Mobile Merger, A.11-06-009

DATE	ACTIVITY	TIME	RATE	VALUE
8/19/11	Brief evaluation of ATT.com for accessibility	1.0	\$185	\$185.00
8/19/11	Brief evaluation of T-Mobile website for accessibility	1.0	\$185	\$185.00
8/19/11	Report to D. Belser re: findings of brief website review	0.5	\$185	\$92.50
TOTALS		2.5		\$462.50

Melissa Kasnitz, 2012 Merits Time
AT&T/T-Mobile Merger
A.11-06-009

Date	Activity	Time	Rate	Value	Issue
05/07/12	Review proposed decision; notes re: same	0.6	\$445.00	\$267.00	GP
05/08/12	Review record to evaluate PD and need for comments on same	0.5	\$445.00	\$222.50	GP
05/09/12	Email to TURN re: strategy for potential comments on PD	0.1	\$445.00	\$44.50	GP
05/29/12	Review Party comments on PD	0.3	\$445.00	\$133.50	GP
06/04/12	Review Party reply comments	0.5	\$445.00	\$222.50	GP
06/11/12	Review Agenda Decision	0.2	\$445.00	\$89.00	GP
07/23/12	Review Revision 1	0.2	\$445.00	\$89.00	GP
08/02/12	Review Revision 2	0.2	\$445.00	\$89.00	GP
08/29/12	Review Final Decision	0.2	\$445.00	\$89.00	GP

Total:	
Hours	2.8
Value	\$1,246.00

Melissa W. Kasnitz, 2011 Comp Time
AT&T/T-Mobile Merger
A.11-06-009

Date	Activity	Time	Rate	Value	Issue
09/06/11	Email exchange w/ B. Nusbaum (TURN) re: NOI	0.1	\$210.00	\$21.00	Fees
09/07/11	t/c - ALJ Hecht re: NOI deadline	0.2	\$210.00	\$42.00	Fees
09/07/11	Draft NOI	1.1	\$210.00	\$231.00	Fees
09/07/11	Finalize NOI	0.5	\$210.00	\$105.00	Fees

Total:	
Hours	1.9
Value	\$ 399.00

Melissa W. Kasnitz, 2012 Comp Time
AT&T/T-Mobile Merger
A.11-06-009

Date	Activity	Time	Rate	Value	Issue
09/10/12	Review time records for completeness and accuracy	1.2	\$222.50	\$267.00	Fees
09/12/12	Draft Compensation Request: eligibility and substantial contribution	1.2	\$222.50	\$267.00	Fees
09/14/12	Draft Compensation Request: Reasonableness	1.5	\$222.50	\$333.75	Fees
09/17/12	Review expert rates & justification for same	0.5	\$222.50	\$111.25	Fees
09/21/12	Draft Compensation Request: Justification for 2012 Rates following adoption of rate resolution	0.6	\$222.50	\$133.50	Fees
09/28/12	Finalize compensation request on merits issues	0.7	\$222.50	\$155.75	Fees
10/11/12	Review records of time spent on compensation issues & analysis of same	0.4	\$222.50	\$89.00	Fees
10/12/12	Finalize Compensation Request and attachments to same	1.2	\$222.50	\$267.00	Fees

Total:	
Hours	7.3
Value	\$1,624.25