



Decision _____

FILED

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

10-27-16
04:24 PM

Order Instituting Rulemaking To Evaluate Telecommunications Corporations Service Quality Performance and Consider Modification to Service Quality Rules.	Rulemaking 11-12-001 (Filed December 1, 2011)
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**INTERVENOR COMPENSATION CLAIM OF THE GREENLINING INSTITUTE
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE
GREENLINING INSTITUTE**

NOTE: After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD, supporting EXCEL Timesheets, and any other supporting documents to the Intervenor Compensation Program Coordinator at Icompcoordinator@cpuc.ca.gov.

Intervenor: The Greenlining Institute	For contribution to Decision D.16-08-021
Claimed: \$59,073.25	Awarded: \$
Assigned Commissioner: Picker	Assigned ALJ: Ayoade
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:	/s/ Paul Goodman
Date: 10/27/16	Printed Name: Paul Goodman

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

A. Brief description of Decision:	<p>D.13-02-023 affirms provisions of the scoping memo requiring a network evaluation study and adopting a funding mechanism for such study.</p> <p>D.15-08-041 affirms Commission direction to conduct the network evaluation study originally ordered in Decision 13-02-023.</p> <p>D.16-08-021 adopts General Order 133-D, the result of significant revisions to G.O. 133-C including automatic penalties and increased reporting requirements.</p>
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	3/26/2012	
2. Other specified date for NOI:		
3. Date NOI filed:	4/13/2012 (Original) 10/9/2012 (Amended)	
4. Was the NOI timely filed?		
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.10-02-005	
6. Date of ALJ ruling:	3/29/2010	
7. Based on another CPUC determination (specify):		
8. Has the Intervenor demonstrated customer or customer-related status?		
Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number4:	R.09-08-009	
10. Date of ALJ ruling:	1/10/2011	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.16-08-021	
14. Date of issuance of Final Order or Decision:	8/29/2016	
15. File date of compensation request:	10/27/2016	
16. Was the request for compensation timely?		

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

#	Intervenor’s Comment(s)	CPUC Discussion

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

A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059). (For each contribution, support with specific reference to the record.)

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
<p>A. Jurisdiction</p> <p>Greenlining noted that a growing number of Californians depend on alternative technologies for telephone services (Opening Comments on OIR at p. 2), and that the Commission has jurisdiction over wireless and VoIP providers. (Opening Comments on OIR at p. 4).</p>	<p>Note: please see Comment A.</p> <p>The Commission held that it has authority to impose service quality standards on wireless carriers. D.16-08-021 at p. 31.</p> <p>The Commission held that it has the jurisdiction, at minimum, to require VoIP carriers to submit to service quality standards and reporting requirements. D.16-08-021 at p. 25</p>	
<p>B. Existing SQ Requirements</p> <p>Greenlining argued that competition has been insufficient to ensure that carriers met the current service quality requirements (Reply Comments on OIR at p. 8; Response to Verizon Motion for Evidentiary Hearing at p. 2; Reply Comments on Amended Scoping Memo at pp. 6-7).</p>	<p>The Final Decision agreed that “the continuing failure of AT&T and Verizon to meet CCPUC adopted minimum service quality standards demonstrates that competition has not been sufficient to ensure quality service.” D.16-08-021 at p. 23.</p>	
<p>Greenlining argued that carriers had failed to meet existing standards (Response to Verizon Motion for Evidentiary Hearing at p. 2; Reply Comments on Amended Scoping Memo at pp. 10-11).</p>	<p>The Commission agreed that AT&T and Verizon had failed to meet the then-current service quality standards. D.16-08-021 at p. 23.</p>	
<p>C. Improvements on service requirements</p>		

<p>Greenlining argued that the Commission should implement rules that improve outage reporting, specifically interval measures on Sundays, holidays, states of emergency, and catastrophic events (Opening Comments on Staff Report at pp. 4-5; Reply Comments on Amended Scoping Memo at pp. 7-10).</p>	<p>D. 16-08-021 revised the G.O. 133 by adding language that specifies when a catastrophic event begins and ends, and requiring carriers to provide specific data about the catastrophic event and related outages.</p> <p>February 2, 2015 ALJ Ruling and Staff Proposal, p. 7</p> <p>Final Decision, pp. 8-10</p>	
<p>Greenlining argued that the Commission should impose service quality standards on wireless and VoIP carriers (Opening Comments on OIR at pp. 12; Comments On The Responses To The Administrative Law Judge’s Ruling Requiring Telecommunications Corporations To Provide Data at pp. 1-5; Opening Comments on Staff Report at pp. 5-6).</p>	<p>D.16-08-021 maintains the reporting requirements for wireless carriers originally set forth in GO 133-C to provide federal outage reports to the Commission and to provide coverage maps on their website in specific formats and level of detail (G.O. 133-D, Rules 4 & 5) D.16-08-021, p. 24-26, 31, Finding of Fact 12, Conclusions of Law 10 &11, Ordering Paragraph 1.</p> <p>The Commission held that it has the jurisdiction, at minimum, to require VoIP carriers to submit to service quality standards and reporting requirements. D.16-08-021 at p. 25</p>	
<p>D. Network infrastructure study</p> <p>Greenlining argued that a network infrastructure study is necessary to determine the condition of carriers’ infrastructure and facilities and ensure that the facilities are sufficient to meet the needs of customers and public safety (Opening Comments on Proposed Decision of Commissioner Ferron at p. 1; Reply Comments on Amended Scoping Memo at p. 12).</p>	<p>The Full Commission reconfirmed the need for a study in Interim Decision D.13-02-023. ,D.13-02-023 at pp. 3-5.</p> <p>The Commission reconfirmed the Decision ordering the study in D.15-08-041. D.15-08-041, Findings of Fact 2, 5, Conclusion of Law 3; Ordering Paragraph 1, 2</p> <p>The Final Decision acknowledges the requirement in D.15-08-041 and states that the network study is an independent requirement. D.16-08-021 at p. 30.</p>	

<p>E. Penalties Greenlining argued that the then-current service quality standards required additional enforcement mechanisms, including fines and service guarantees. (Opening Comments on OIR at pp. 15-16; Response to Verizon Motion for Evidentiary Hearing at p. 3; Opening Comments on Staff Report at pp. 1-3; Reply Comments on Amended Scoping Memo at pp. 11-12). See Note B.</p>	<p>D.16-08-021 adopted a penalty mechanism to fine companies that do not meet the G.O. standards for more than two consecutive months. The Commission agreed with Greenlining and Commission staff and found that carrier corrective action was not sufficient incentive for some carriers to meet minimum standards and improve compliance.</p> <p>Final Decision on pp. 17-18, 22-23, Conclusions of Law 2, 3</p>	

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
<p>a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹</p>	Yes	
<p>b. Were there other parties to the proceeding with positions similar to yours?</p>	Yes	
<p>c. If so, provide name of other parties: The Utility Reform Network, Center for Accessible Technology, Consumer Federation, National Consumer Law Center, Communications Workers of America, CALTEL</p>		
<p>d. Intervenor's claim of non-duplication:</p> <p>Greenlining's work in this proceeding was different from that of ORA or the other consumer advocates, in that it focused on service quality impacts on communities of color and low income communities. This perspective influenced many of the positions Greenlining took in the proceeding.</p> <p>Throughout the proceeding, Greenlining remained in regular contact with advocates from TURN, Center for Accessible Technology, Consumer Federation, National Consumer Law Center, Communications Workers of America, CALTEL, and other highly active parties to ensure that Greenlining's work was not duplicative. Where parties agreed, they coordinated rather than merely echoing each other. In fact, 3.9% of Greenlining's reported hours are related to emails or phone calls</p>		

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

<p>regarding coordination of efforts. When possible, Greenlining coordinated on joint filings and ex parte meetings to avoid duplicative efforts.</p> <p>As part of its advocacy in this proceeding, Greenlining spent some of its time gathering feedback from members of the Greenlining Coalition, a diverse group of community-based organizations that have banded together around a common vision of social justice. This allowed Greenlining to present perspectives of a number of different groups whose voices would have otherwise gone unheard. It also ensured that Greenlining brought a different perspective than that brought by other intervenors.</p> <p>While litigating this case for almost five years, Greenlining invested substantial time and effort to work with other intervenors and parties to avoid or minimize duplication of its work. For example, during drafting of joint comments, Greenlining often took the lead on creating initial drafts for Joint Consumers. Greenlining focused on specific areas of expertise, particularly issues regarding jurisdiction, competition, the methodology of the network study, and changes to the proposed penalty provisions. There are numerous examples that Greenlining would be glad to provide should the Commission find it necessary here. Greenlining urges the Commission to find that any duplication of effort was minimal and was necessary to ensure effective and efficient representation of a wide variety of consumer interests.</p> <p>Greenlining is claiming compensation only for the work its own attorneys and advocates performed.</p>	
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C. Additional Comments on Part II (use line reference # or letter as appropriate):

#	Intervenor's Comment	CPUC Discussion
A	<p>The Final Decision in this proceeding is somewhat unusual in that it incorporates the recommendations in the February 2, 2015 Staff Proposal without fully explaining those recommendations. Accordingly, Greenlining has included citations to pertinent sections of the Staff Proposal.</p>	
B.	<p>It is well established that a party may make a substantial contribution to a Commission decision even if its positions are not adopted, as long as the party makes contributions that benefitted and enhanced the Commission's consideration of the issues at hand.</p>	

<p>While the final decision did not always adopt the specific positions Greenlining advocated for, Greenlining’s input in conjunction with other parties around issues such as jurisdiction, the need for improved service quality rules, and penalties substantially informed the Commission’s analysis of all issues considered in this proceeding, and served the interests of a significant group of customers who were not the primary focus of most parties to the proceeding. Accordingly, those efforts constituted a substantial contribution.</p>	
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PART III: REASONABLENESS OF REQUESTED COMPENSATION (to be completed by Intervenor except where indicated)

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

<p>a. Intervenor’s claim of cost reasonableness:</p> <p>Greenlining’s substantial contribution in this docket resulted in significant benefits for ratepayers. There is no question that customers benefit from having access to safe, reliable and robust communications services with minimal interruptions to service. Through Greenlining’s advocacy in this docket in collaboration with other intervenors, all phone service carriers in California must provide some assurance to their customers, and to the Commission, that they are offering robust, reliable, and quality communications services.</p> <p>It may be difficult to quantify exactly what financial losses consumers might suffer as a result of outages, service interruptions, and other problems with service quality. However, as a result of Greenlining’s advocacy in this proceeding, there will be far fewer service quality problems. It is safe to assume that the “savings” experienced by customers as a result of the robust service quality rules greatly exceeds Greenlining’s claim.</p>	<p>CPUC Discussion</p>
<p>b. Reasonableness of hours claimed:</p> <p>Greenlining’s hours were reasonable given the immense volume of information, much of it highly technical or legally complex, considered in this five-year proceeding. Additionally, many carriers in this proceeding aggressively opposed the Commission’s establishing any service quality standards, not only objecting to new rules, but arguing for the elimination</p>	

<p>of the then-existing standards. In light of those carriers’ efforts to eliminate service quality requirements altogether, and the work required to adequately respond to them, Greenlining’s hours were more than reasonable.</p> <p>Greenlining sought to maintain a streamlined process of work assignments internally, with minimal supervisory involvement, which allowed the key expertise to reside in the active advocate, Mr. Goodman.</p> <p>Greenlining has recorded some hours in the “coordination” category (Category G). As discussed above, Greenlining spent substantial time coordinating with TURN, Center for Accessible Technology, Consumer Federation, National Consumer Law Center, Communications Workers of America, CALTEL.</p>	
<p>c. Allocation of hours by issue:</p> <p>A. Jurisdiction—8.21% B. Existing SQ Requirements—12.99% C. Improvements on service requirements—30.88% D. Network infrastructure study—23.45% E. Penalties—11.25% F. General—9.34% G. Coordination—3.88%</p>	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hour s	Rate \$	Total \$
Paul Goodman	2012	39.3	\$305	D.15-05-050	\$11,986.50			
Paul Goodman	2013	24.4	\$310	D.15-05-050	\$7,564.00			
Paul Goodman	2014	35.3	\$320	D.15-05-050	\$11,296.00			
Paul Goodman	2015	45.2	\$320	D.16-09-032	\$14,464.00			
Paul Goodman	2016	30.5	\$325	D.16-09-032	\$9,912.00			
Stephanie Chen	2013	1	\$225	See Comment A.	\$225.00			

Stephanie Chen	2014	0.4	\$230	A.11-05-017	\$92.00			
Stephanie Chen	2015	1.5	\$310	D.16-09-032	\$465.00			
Subtotal: \$ 56,304.50						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
[Person 1]								
[Person 2]								
Subtotal: \$						Subtotal: \$		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Paul Goodman	2016	14.3	\$187.5	D.16-09-032	\$2,681.25			
Stephanie Chen	2012	0.8	\$110	D.13-10-033	\$88.00			
Subtotal: \$2,769.25						Subtotal: \$		
COSTS								
#	Item	Detail			Amount	Amount		
TOTAL REQUEST: \$59,073.75						TOTAL AWARD: \$		
<p>**We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at 1/2 of preparer's normal hourly rate</p>								
ATTORNEY INFORMATION								

Attorney	Date Admitted to CA BAR ²	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Paul Goodman	04/24/2002	219086	No
Stephanie Chen	08/23/2010	270917	No

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

Attachment or Comment #	Description/Comment
A	Ms. Chen does not have an approved compensation rate for work done in 2013. Ms. Chen's approved rate for work done in 2012 was \$220, and in 2013 Resolution ALJ-287 approved a 2% COLA adjustment for work done in 2013. The \$225 rate claimed here reflects Ms. Chen's approved 2012 rate plus a 2% COLA adjustment for 2013.

D. CPUC Disallowances and Adjustments (CPUC completes):

Item	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 Discussion

² This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	
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If not:

Party	Comment	CPUC Discussion

FINDINGS OF FACT

1. Intervenor [has/has not] made a substantial contribution to D._____.
2. The requested hourly rates for Intervenor’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 compensation is \$_____.

CONCLUSION OF LAW

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

ORDER

1. Intervenor is awarded \$_____.
2. Within 30 days of the effective date of this decision, _____ shall pay Intervenor the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay Intervenor 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 compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal

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Reserve Statistical Release H.15, beginning [date], the 75th day after the filing of Intervenor'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.

Attachment 1:
Time Sheets for Attorneys, Advocates and Experts

Proceeding: R.11-12-001, Service Quality
Hours of Paul Goodman in 2012

Issue Areas

- A. Jurisdiction**
- B. Existing SQ Requirements**
- C. Improvements on service requirements**
- D. Network infrastructure study**
- E. Penalties**
- F. General**
- G. Coordination**

A
B
C
D
E
F
G

Date	Description	A	B	C	D	E	F	G	TOTAL
1/12/2012	Review OIR; draft outline for comments			0.7					0.7
1/12/2012	Research re: statutory authority			0.3					0.3
1/17/2012	Draft Comments on OIR; research re same			4.8					4.8
1/17/2012	Draft comments on OIR (Competition, Technological Neutrality)			1.5					1.5
1/17/2012	Draft comments on OIR (Customer reliance on wireless/VoIP, Technological Neutrality)			0.6		1			1.6
1/24/2012	Review NCLC Motion for Party Service						0.2		0.2
1/25/2012	Phone Call with Enrique Gallardo, Bill Nusbaum, Trevor Roycroft re: Service Quality							0.5	0.5
1/25/2012	Draft comments on OIR (Recommendations)				0.3				0.3
1/26/2012	Draft comments on OIR (Failure to meet standards, insufficiency of requirements, lack of sufficient information for consumers to make meaningful choices) including edits and revisions			1.8	1.8	2.4			6

2/2/2012	Review ruling memorializing extension to comment deadlines and scheduling pre-hearing conference.							0.1	0.1
2/22/2012	Review other party comments; draft list of arguments			2.1	2.2				4.3
2/22/2012	Draft outline for reply comments			0.5					0.5
2/22/2012	Draft reply comments--AT&T and Verizon disincentives to provide service quality			0.6					0.6
2/27/2012	Draft reply comments--conflation of service quality and customer satisfaction, wireline standards			0.2					0.2
2/27/2012	Legal research re statutory interpretation			0.5					0.5
2/28/2012	Draft reply comments--health and safety			0.8					0.8
2/28/2012	Draft reply comments--differentiated markets and consumer welfare			1					1
2/28/2012	Draft reply comments--flaws in AT&T and Verizon arguments; competition insufficient to promote service quality.			2.5					2.5
3/1/2012	Review edits and revise reply comments			0.6					0.6
3/15/2012	Review Verizon motion for evidentiary hearing		0.3						0.3
3/18/2012	Review email from Bill Nusbaum re: Verizon motion							0.1	0.1
3/19/2012	Review emails from Bill Nusbaum, Darlene Wong re: Verizon motion							0.2	0.2
3/21/2012	Research re: competition and service quality standards		1.4						1.4
3/21/2012	Email to Bill Nusbaum re: hearing issues			0.4				0.1	0.5
3/21/2012	Review CALTEL response to Verizon motion for evidentiary hearing		0.3						0.3
3/25/2012	Prep for PHC						1.6		1.6
3/26/2012	PHC						2.5		2.5
3/31/2012	Review responses to request for focused evidentiary hearing (DRA, TURN, AT&T)						0.8		0.8
5/18/2012	Review Ruling Requiring Telecommunications Corporations to Provide Data.		0.3						0.3
5/25/2012	Review ALJ's email ruling re: extension of deadlines						0.2		0.2

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6/14/2012	Review responses to ruling requiring telecommunications corporations to provide data		2.2						2.2
7/16/2012	Review email re: request to destroy document						0.1		0.1
9/25/2012	Review Assigned Commissioner's Scoping Memo and Ruling				1.8				1.8
	Total hours for Paul Goodman, Senior Legal Counsel in 2012	0	4.5	18.9	6.1	3.4	5.4	1	39.3

**Proceeding: R.11-12-001, Service Quality
Hours of Paul Goodman in 2013**

Issue Areas

A. Jurisdiction

B. Existing SQ Requirements

C. Improvements on service requirements

D. Network infrastructure study

E. Penalties

F. General

G. Coordination

A
B
C
D
E
F
G

Date	Description	A	B	C	D	E	F	G	TOTAL
1/4/2013	Review VZ Motion to allow comments on ruling re: network study				0.6				0.6
1/18/2013	Review Administrative Law Judge's Ruling on the January 31, 2013 workshop.				0.9				0.9
1/29/2013	Prep for Workshop		0.5	0.5	2				3
1/31/2013	Workshop		1.3	1.7	1.8				4.8
2/8/2013	Review ALJ ruling re: extension of deadlines for comments on workshop						0.1		0.1
2/6/2013	Emails w/Regina Costa re: workshop issues							0.2	0.2
2/6/2013	Meeting w/Paul Goodman, Stephanie Chen, Enrique Gallardo re: Workshop issues				0.5				0.5
2/7/2013	Phone call w/Regina Costa (TURN) re: workshop issues				0.5				0.5
2/13/2013	Meeting w/ Paul Goodman, Stephanie Chen re: Service Quality Proceeding			0.2	0.3				0.5
2/19/2013	Draft Opening Comments on Ferron PD			0.8					0.8
2/20/2013	Review comments on Decision Affirming Provisions of the Scoping Memo and Ruling		1.7						1.7
2/26/2013	Draft opening comments on workshop (infrastructure, record-keeping)			0.5	0.6				1.1

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2/26/2013	Review reply comments on Decision Affirming Provisions of the Scoping Memo and Ruling (0.9						0.9
2/27/2013	Draft opening comments on workshop (study integrity, investment decision-making)				2.4				2.4
2/28/2013	Review Decision D1302023 - Affirms Provisions of the Scoping Memo and Ruling dated September 24, 2012.			0.5					0.5
3/1/2013	review opening comments on workshop		2.9						2.9
3/7/2013	review reply comments on workshop		1.6						1.6
8/19/2013	Review motion for reassignment						0.1		0.1
8/15/2013	Review draft letter re CalNENA document		0.4						0.4
8/16/2013	Phone Call with TURN, NCLC, CforAT re: CalNENA document							0.5	0.5
9/4/2013	Phone call with TURN, NCLC, CforAT re: motion to supplement the record							0.4	0.4
	Total hours for Paul Goodman, Senior Legal Counsel in 2013	0	9.3	4.2	9.6	0	0.2	1.1	24.4

**Proceeding: R.11-12-001, Service Quality
Hours of Paul Goodman in 2014**

Issue Areas

A. Jurisdiction

B. Existing SQ Requirements

C. Improvements on service requirements

D. Network infrastructure study

E. Penalties

F. General

G. Coordination

A
B
C
D
E
F
G

Date	Description	A	B	C	D	E	F	G	TOTAL
3/18/2014	Review TURN emergency motion						0.5		0.5
3/26/2014	Review email from Jesus Roman re: extension of deadline						0.1		0.1
3/28/2014	Meeting with Paul Goodman, Stephanie Chen, Carmelita Miller re: TURN emergency motion						0.4		0.4
4/14/2014	Draft response to TURN emergency Motion		0.9						0.9
4/15/2014	Review TURN supplement to emergency motion/motion to file under seal				1.6				1.6
4/15/2014	Draft response to TURN emergency motion		0.4						0.4
4/16/2014	review responses to TURN emergency motion			1.6					1.6
4/17/2014	Review CALTEL Amended Response			0.2					0.2
9/24/2014	Review Assigned Commissioner's Amended Scoping Memo and Ruling.		0.3						0.3
10/6/2014	Review ALJ's Ruling denying request by Verizon California Inc. for confidential treatment of unadjusted outage information.						0.2		0.2
10/8/2014	Emails with Regina Costa re: joint comments on Amended Scoping Memo and Ruling							0.2	0.2
10/8/2014	phone call with Melissa Kasnitz				0.3		0.3		0.6

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10/21/2014	Emails with Melissa Kasnitz and Leslie Mehta re comments on Amended Scoping Memo and Ruling							0.2	0.2
10/23/2014	Emails with Regina Costa re: jurisdictional arguments/section 710	0.4						0.1	0.5
10/23/2014	Draft Comments on 2014 Staff report		0.5	1.2	0.9	2.6			5.2
10/24/2014	phone call with Melissa Kasnitz				0.7		0.7		1.4
10/25/2014	Review Opening Comments on Staff Report	0.4	0.5	1.2	0.7	1.2	0.9		4.9
10/29/2014	Review memo from Melissa Kasnitz re: Verizon comments		0.3	0.1					0.4
11/6/2014	Emails with Regina Costa, Leslie Mehta, Melissa Kasnitz re: reply comments							0.3	0.3
11/8/2014	Review draft Roycroft declaration		2.1						2.1
11/11/2014	Review update draft Roycroft Declaration			0.3					0.3
11/11/2014	Draft reply comments on Amended Scoping Memo (Jurisdiction, technological neutrality, catastrophic events/NORS threshold, network study).	1.2		3.1	0.5				4.8
11/12/2014	Draft reply comments on Amended Scoping Memo (Jurisdiction, VoIP standards, current standards, catastrophic events)		0.9	1.2					2.1
11/13/2014	Draft reply comments on staff report		1.2			0.2			1.4
11/14/2014	review reply comments on staff report	0.6	0.7	2.3	0.5	0.6			4.7
	Total hours for Paul Goodman, Senior Legal Counsel in 2014	2.6	7.8	11.2	5.2	4.6	3.1	0.8	35.3

**Proceeding: R.11-12-001, Service Quality
Hours of Paul Goodman in 2015**

Issue Areas

A. Jurisdiction

B. Existing SQ Requirements

C. Improvements on service requirements

D. Network infrastructure study

E. Penalties

F. General

G. Coordination

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Date	Description	A	B	C	D	E	F	G	TOTAL
2/2/2015	Review Assigned Administrative Law Judge's Ruling Setting Dates for Comments and Reply Comments on Staff Proposal.						1.5		1.5
2/26/2015	Emails with Hien Vo Winter re: comments on Staff Proposal							0.1	0.1
3/4/2015	Call with Hien Vo Winter, Regina Costa re: proposed service quality rules						1		1
3/25/2015	Draft outline on 2015 Staff Proposal					0.4			0.4
3/26/2015	Emails with Regina Costa re: joint comments on Staff Proposal						0.2		0.2
3/29/2015	Draft Opening Comments on Staff Proposal (reporting, penalties)			0.4	0.3	0.4			1.1
3/30/2015	Draft Opening Comments on Staff Proposal (reporting, revisions)			0.2			0.3		0.5
4/1/2015	Review Comments on Staff Proposal	0.5	0.8	1.4	0.7	0.8			4.2
4/6/2015	Emails with Regina Costa, Christine Mailloux, Melissa Kasnitz on Reply Comments						0.3		0.3
4/10/2015	Phone call with Regina Costa, Melissa Kasnitz on Reply Comments							0.5	0.5

4/13/2015	Draft Reply Comments on Staff Proposal (industry-wide rules)			1.1					1.1
4/14/2015	Review draft of Roycroft statement		0.7						0.7
4/14/2015	Review reply comments						0.2		0.2
4/16/2015	Draft Reply Comments on Staff Proposal (Fines, Jurisdiction, Reporting)	1.1		0.5		0.3			1.9
4/17/2015	Review Proposed Decision Deferring Network Study Requirement Adopted in Decision 13-02-023.				0.6				0.6
4/23/2015	Review strategy memo from Regina Costa							0.4	0.4
4/29/2015	Review ORA motion to file under seal/ORa reply comments						0.3		0.3
4/30/2015	Draft ex parte letter re: network study				2.3				2.3
5/4/2015	Email to Melissa Kasnitz re: comments on PD							0.1	0.1
5/4/2015	Meet w/ORa, CWA, Consumer groups re: strategy for ex parte meetings				0.2				0.2
5/4/2015	Ex Parte Meeting with Niki Bawa (Comm. Peterman)				0.5				0.5
5/4/2015	Ex Parte Meeting with Hammond, Podolinsky (Pres. Picker)				0.5				0.5
5/4/2015	Ex Parte Meeting with Jessica Hecht (Comm. Florio)				0.5				0.5
5/5/2015	Ex Parte meeting with L. Wong (Comm. Randolph)				0.7				0.7
5/5/2015	Draft Comments on PD (penalty mechanism)					1.5			1.5
5/6/2015	Call with ORa, TURN, CforAT, CWA, Consumer Fed re: ex parte debrief/ex parte letter							0.5	0.5
5/8/2015	Review Opening Comments on PD				1.2				1.2
5/13/2015	Review Reply Comments on PD				0.5				0.5
5/28/2015	Ex Parte Meeting with Bill Johnston				0.5				0.5
6/3/2015	Meeting with Stephanie Chen re: Service Quality Proceeding				0.5				0.5
7/3/2015	Review Alternate Proposed Decision of Commissioners Florio and Sandoval affirming Commission direction to conduct the network evaluation study originally ordered in Decision 13-02-023.				0.4				0.4
7/10/2015	Call with ORa, TURN, CforAT re: APD requiring network study				1				1

7/21/2015	Call with ORA, TURN, CforAT re: APD requiring network study				0.5				0.5
7/23/2015	Review Opening Comments on APD				1				1
7/24/2015	Call with ORA, TURN, CforAT re: reply comments							0.5	0.5
7/26/2015	Draft Reply Comments on APD (network study)				1.6				1.6
7/29/2015	Review Reply Comments on APD				0.7				0.7
8/4/2015	Ex Parte with Commissioner Peterman				0.5				0.5
11/12/2015	Review PD								0
11/19/2015	Emails with ORA, CforAT, TURN re: safe harbor provisions							0.3	0.3
11/30/2015	Phone call with Regina Costa, Melissa Kasnitz re: comments on PD							0.5	0.5
12/1/2015	Draft comments on PD (fines, safe harbor, standards for wireless)			0.5	1.9				2.4
12/1/2015	Call with ORA, TURN, CforAT re: comments on PD							0.5	0.5
12/2/2015	Draft comments on PD (standards for wireless, revisions)			0.3				0.3	0.6
75214	Review Opening Comments on PD	1.6		2.1		2.2			5.9
12/4/2015	Emails with TURN, ORA, CforAT re: Reply Comments							0.3	0.3
	Review Reply Comments on PD	0.9		1		0.7			2.6
12/11/2015	Ex Parte with John Reynolds (Comm. Peterman)							0.5	0.5
12/15/2015	Ex Parte with Bill Johnston (Comm. Sandoval)							0.5	0.5
12/29/2015	Review ALJ Ruling re: comment dates			0.4					0.4
	Total hours for Paul Goodman, Senior Legal Counsel in 2015	4.1	1.5	7.9	16.6	6.3	5.1	3.7	45.2

**Proceeding: R.11-12-001, Service Quality
Hours of Paul Goodman in 2016**

Issue Areas

A. Jurisdiction

B. Existing SQ Requirements

C. Improvements on service requirements

D. Network infrastructure study

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Date	Description	A	B	C	D	E	F	G	TOTAL
1/23/2016	Review Opening Comments on PD			1.3					1.3
1/29/2016	Review Leg. Counsel's opinion re: jurisdiction	2.1							2.1
2/3/2016	Call with ORA, TURN, CforAT re: NORS reports			0.8					0.8
2/9/2016	Draft reply Comments on PD (Jurisdiction)	1.4							1.4
3/22/2016	Review Proposed Decision Adopting General Order 133-D	0.5		0.5		0.5			1.5
4/5/2016	Draft Opening Comments on PD (Outline)						0.5		0.5
4/8/2016	Draft Opening Comments on PD (Definitions, Standards for wireless and VoIP, Network Study)			2	0.3				2.3
4/11/2016	Draft Opening Comments (Revisions)			0.2					0.2
4/13/2016	Review Opening Comments on PD	1.2		1.1	0.2	1.3			3.8
4/20/2016	Review Reply Comments on PD	0.6		0.6	0.2	0.2			1.6
6/22/2016	Review Alternate Proposed Decision of Commissioner Sandoval adopting General Order 133-D.	0.4		1		0.2			1.6
6/28/2016	Draft Opening Comments on APD (outline, catastrophic events)			0.9					0.9
7/7/2016	Draft Opening Comments on APD (penalties)					1.4			1.4

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7/13/2016	Review Opening Comments on APD	0.6		1.9		0.9			3.4
7/17/2016	Draft Reply Comments on APD (Penalties and Misc.)			0.9	1.2				2.1
7/19/2016	Review Reply Comments on APD	0.4		0.8		0.4			1.6
8/18/2016	Review Decision (D.16-08-021)						0.4		0.4
8/30/2016	Review CALTEL Petition for Modification					0.5			0.5
9/16/2016	Review draft Application for Rehearing			0.8					0.8
9/19/2016	Draft Application for Rehearing (wireless JXN)	0.7							0.7
9/23/2016	Call with Melissa Kasnitz							0.3	0.3
9/29/2016	Review CALTEL and Cox Apps for rehearing			0.3		0.3			0.6
10/13/2016	Review Responses to Apps for Rehearing			0.7					0.7
	Total hours for Paul Goodman, Senior Legal Counsel in 2016	7.9	0	12.5	1.9	5.7	0.9	0.3	30.5

**Proceeding: R.11-12-001, Service Quality
Hours of Paul Goodman in 2016
Intervenor Compensation Claim Preparation**

Date	Description	Total
10/17/2016	Claim Preparation	2.4
10/23/2016	Claim Preparation	3.7
10/25/2016	Claim Preparation	1.8
10/26/2016	Claim Preparation	3.3
10/27/2016	Claim Preparation	3.1
	Total Hours for P. Goodman, Sr. Legal Counsel in 2016	14.3

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**Proceeding: R.11-12-001, Service Quality
Hours of Stephanie Chen in 2016
NOI Preparation**

Date	Description	Total
4/13/2012	Draft NOI	0.4
10/9/2012	Draft Amended NOI	0.4
	Total hours for Stephanie Chen, Energy & Telecommunications Policy Director in 2013	0.8

**Proceeding: R.11-12-001, Service Quality
Hours of Stephanie Chen in 2013**

Issue Areas

A. Jurisdiction

B. Existing SQ Requirements

C. Improvements on service requirements

D. Network infrastructure study

E. Penalties

F. General

G. Coordination

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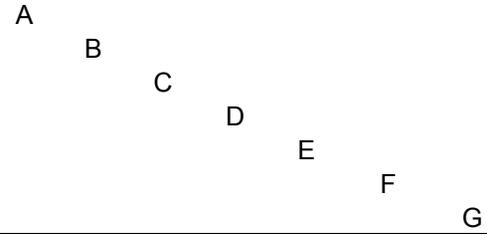
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Date	Description	A	B	C	D	E	F	G	TOTAL
2/6/2013	Meeting w/Paul Goodman, Stephanie Chen, Enrique Gallardo re: Workshop issues				0.5				0.5
2/13/2013	Meeting w/ Paul Goodman, Stephanie Chen re: Service Quality Proceeding			0.2	0.3				0.5
	Total hours for Stephanie Chen, Energy & Telecommunications Policy Director in 2013	0	0	0.2	0.8	0	0	0	1

**Proceeding: R.11-12-001, Service Quality
Hours of Stephanie Chen in 2014**

Issue Areas

- A. Jurisdiction**
- B. Existing SQ Requirements**
- C. Improvements on service requirements**
- D. Network infrastructure study**
- E. Penalties**
- F. General**
- G. Coordination**



Date	Description	A	B	C	D	E	F	G	TOTAL
3/28/2014	Meeting with Paul Goodman, Stephanie Chen, Carmelita Miller re: TURN emergency motion						0.4		0.4
	Total hours for Stephanie Chen, Energy & Telecommunications Policy Director in 2014	0	0	0	0	0	0.4	0	0.4

**Proceeding: R.11-12-001, Service Quality
Hours of Stephanie Chen in 2015**

Issue Areas

A. Jurisdiction

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Date	Description	A	B	C	D	E	F	G	TOTAL
5/29/2015	Ex Parte with Commissioner Sandoval				1				1
6/3/2015	Meeting with Stephanie Chen re: Service Quality Proceeding				0.5				0.5
	Total hours for Stephanie Chen, Energy & Telecommunications Policy Director in 2015	0	0	0	1.5	0	0	0	1.5