



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

R.09-06-019

**COMMENTS OF PACIFIC BELL TELEPHONE COMPANY  
D/B/A AT&T CALIFORNIA (U 1001 C); AT&T ADVANCED SOLUTIONS, INC.  
(U 6346 C); AT&T COMMUNICATIONS OF CALIFORNIA, INC. (U 5002 C);  
TCG SAN FRANCISCO (U 5454 C); TCG LOS ANGELES, INC. (U 5462 C);  
TCG SAN DIEGO (U 5389 C); AND AT&T MOBILITY LLC  
(NEW CINGULAR WIRELESS PCS, LLC (U 3060 C); CAGAL  
CELLULAR COMMUNICATIONS (U 3021 C); SANTA BARBARA  
CELLULAR SYSTEMS LTD. (U 3015 C); AND VISALIA CELLULAR  
TELEPHONE COMPANY (U 3014 C) ON PROPOSED REVISIONS  
TO THE DEFINITION OF “BASIC TELEPHONE SERVICE”**

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In response to the Assigned Commissioner’s Amended Scoping Memo and Solicitation of Comments Regarding Revisions to the “Basic Telephone Service Requirements, issued May 10, 2010 (“Ruling”), AT&T<sup>1</sup> hereby submits its comments on revisions to the definition and requirements of “Basic Telephone Service” as proposed in the Ruling.

AT&T agrees with the Ruling that it is important to craft the “Basic Telephone Service” requirements to “promote competitive and technological neutrality, consistent with the Commission’s Universal Service policies.”<sup>2</sup> In so doing, the Commission should be very careful not to include requirements that effectively preclude some technologies. Many elements in the Ruling’s “Straw Proposal”<sup>3</sup> go a long way to opening participation to all technologies. But some proposals, such as requiring a usage allowance, risk inadvertent exclusion. Retaining outmoded wireline-centric definitions discourage widespread deployment of new technologies and may have the unintended consequence of limiting consumers from choosing alternative technologies that may be a better fit for their particular needs. AT&T suggests it is better to minimize the requirements for basic service and evaluate separately in each public policy program whether there are any additional requirements needed for that program to further the Commission’s Universal Service goals. In this way the basic service definition can embrace multiple technologies, and the Commission will continue to have the flexibility it needs to achieve its goals within each of the particular programs.

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<sup>2</sup> Ruling, p. 2.

<sup>3</sup> *Id.* at Attachment A.

**I. Basic Telephone Service Should Not Include Any Requirement for a Minimum Allowance of Minutes at “Basic Service” Fixed Rate.<sup>4</sup>**

The Ruling proposes that the current requirement for free unlimited incoming calls be replaced with a requirement for a “reasonable allowance of minutes”<sup>5</sup> at a “basic service” fixed rate.<sup>6</sup> Today’s consumers do not have “one size fits all” communications needs and priorities – far from it. Consequently, providers have a variety of plans in the market to satisfy all levels of customer needs for allowances of minutes. For example, with net10, customers can buy a phone and get 300 minutes to use over 60 days for \$20<sup>7</sup> and can add 300 minutes for \$30 that are good for 60 days.<sup>8</sup> AT&T California offers Measured Rate service for residential customers for \$8.87 per month; all Local and Zone 3 calls are measured, and once the customer exceeds their monthly Call Allowance of \$6.75, they are charged on a per-minute basis.<sup>9</sup> Comcast has VoIP calling plans ranging from \$24.95/month for unlimited local service to \$42.95/month for unlimited local and nationwide calling.<sup>10</sup> Each customer, based on their individual needs and priorities chooses the best provider and plan for them. To succeed in the marketplace, providers work hard to create products that meet the needs of customers.

The Commission must resist the idea that it needs to tell carriers they have to offer an allowance of a certain minimum number of minutes for two reasons. First, the quantity is too subjective. Second, the usage allowance is one of the very product attributes that competitive providers use to differentiate themselves. Intruding into this area will alter the marketplace,

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<sup>4</sup> Items 4 and 9.

<sup>5</sup> Ruling, Attach. A, p. 4.

<sup>6</sup> *Id.* at 7.

<sup>7</sup> See net10 offer (accessed 05/28/10 at: <<http://www.net10-store.com/bpdirect/net10/Start.do?action=view&market=GSM5AT&AID=&VID=&VC=&SAHCID=&COM=&locale=en&siteType=TR&gotoPhonelist=true&zip=94105&ProspectID=A6AB0D104225472A99C519902124C75A>>).

<sup>8</sup> See, e.g., net10 airtime plans (accessed 05/28/10 at:

<<https://www.net10.com/direct/Purchase?payGo=true&app=NET10&lang=en>>).

<sup>9</sup> See AT&T California Schedule CAL.P.U.C. No. A.5.2.2.

<sup>10</sup> See Comcast “Local and More” offer (accessed 05/28/10 at:

<<http://www.comcast.com/Corporate/Learn/DigitalVoice/LocalWithMore.html>>); the local and nationwide plan starts out at a six-month promotional rate of \$19.99/month.

reduce competition, and limit customer choice. Whether it is for the purposes of Lifeline or participation in a reverse auction for B-Fund support, the Commission needs to maximize the range of providers participating. Dictating a minimum usage allowance will defeat that effort.

AT&T can understand that in the context of a single COLR as the winner of a reverse auction, knowing the provider's minimum usage allowance and price could be important. AT&T suggests that bidders identify the usage allowance and price to which they will commit. The Commission can look at these commitments in determining the winner. This is akin to the CASF process that scores applications based on a number of factors, not just the amount of money requested.

Regarding Lifeline, AT&T suggests that a minimum usage allowance will dissuade participation and is simply unnecessary. Lifeline customers should have the same broad range of choices of services afforded to other customers. Their needs, like all other customers, vary one from another; and, setting a minimum usage allowance for the purposes of Lifeline service limits their choices and perpetuates the outmoded wireline-centric focus of the current program.

## **II. “Free Access” to 800 or 800-Like Toll-Free Services Should Not Be a Requirement.**

Calls to 800 numbers should not be excluded from usage allowances. The requirement should merely be that 800 calls remain toll free in that usage charges are not added simply because it is an 800 call. As the Ruling recognizes, 800 numbers are really designed to be “toll free.” But excluding them from usage allowances ignores that 800 numbers have historically been used not only by businesses to allow customers to call them toll free, but also by communications providers to allow for dial around long distance services that actually compete with the basic service provider. Requiring exclusion of 800 calls from the allowance changes the

fundamental nature of 800 calls being “toll free” and potentially skews the marketplace by creating inappropriate incentives for dial around service.

Additionally, since wireless providers and VoIP providers often do count calls to 800 numbers against a customer’s allowance, this requirement would require costly systems changes for many providers, thus discouraging them from participating in Lifeline program and in any reverse auction.

**III. Basic Telephone Service Should Not Include Any Requirement for Billing Adjustments for Charges Incurred Inadvertently, Mistakenly, or without Authorization as the Matter Is Currently Being Addressed in R.00-02-004.**

In R.00-02-004, the Commission is currently considering changing the rules regarding how carriers are to handle claims of unauthorized charges.<sup>11</sup> In G.O. 168, Part 4, the Commission has already set forth cramming regulations.<sup>12</sup> There is no justification for these rules to be different based on whether the service is basic service or not. The rules on billing adjustments should be uniformly applied; there is no need for a separate basic service rule. Including a unique requirement for billing adjustments for inadvertent, mistaken or unauthorized charges in the definition of basic service would discourage participation by providers of new technologies and would, therefore, limit consumer choices for basic service.

**IV. Service Quality Standards Should Not Apply to Carriers Providing Basic Service and Seeking B-Fund Support or Participating in the Lifeline Program.**

AT&T suggests that for purposes of the pilot, the Commission not impose any service quality requirements on the auction winner. Alternative technology providers will be dissuaded from participating if a host of service quality requirements that do not apply to them today are required of them as a condition of B-Fund support. Alternatively, the Commission could ask

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<sup>11</sup> See R.00-02-004, *Assigned Commissioner’s Ruling Requesting Comment on Proposed California Telephone Corporation Billing Rules* (Feb. 12, 2010), available at <<http://docs.cpuc.ca.gov/efile/RULINGS/113656.pdf>>.

<sup>12</sup> See *id.* at Appdx. A (“Revised General Order 168, Part 4 -- California Telephone Corporation Billing Rules”).

bidders to identify any service quality commitments in their bids, and the service quality commitments could be weighed along with a number of factors to determine the winning bid. Due to the lack of state regulation of alternative technologies, providers of alternative technologies often have multi-state, if not national operations and systems, allowing for greater efficiencies which ultimately results in lower costs, helping to reduce prices consumers ultimately pay for services. State-specific service requirements would be very difficult and expensive for these providers and would have the effect of driving up the costs for all consumers. Consequently, aside from maximizing provider participation in Lifeline and any reverse auctions, if the Commission also wants to maximize the beneficial effects that would flow from such providers participating in both the B-Fund and the CA Lifeline fund, the Commission should not adopt service quality requirements either as a part of basic service or as a condition of eligibility for Lifeline or B-Fund support.

As for Lifeline, there is no basis for unique service quality requirements for carriers participating in the Lifeline program. Should customers of Lifeline not be happy with the service a provider delivers, they can exercise their right to move to another provider.<sup>13</sup> We also note there is no basis for a provider participating in Lifeline to “to certify and demonstrate it is capable of serving all residential customers within the region where the COLR obligation exists . . . .”<sup>14</sup> This requirement makes sense in the context of a COLR, but not for Lifeline.

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<sup>13</sup> See *Re Service Quality Standards for All Telecommunications Carriers*, Decision No. 09-07-019, *Decision Adopting General Order 133-C and Addressing Other Telecommunications Service Quality Reporting Requirements*, 275 P.U.R.4<sup>th</sup> 70 (July 9, 2009), *mimeo*, p. 2 (“Consistent with the general agreement of the parties that competitive environments act to apply a natural pressure for carriers to ensure adequate service quality, it is reasonable to simplify the existing reporting requirements.”).

<sup>14</sup> Ruling, p. 13.

**V. The Minimum Fitness Standards Should Be the Same Used for CASF.**

The Commission considered how to ensure CASF grant recipients were qualified to complete the broadband project and provide service for the required period of time.<sup>15</sup> The Commission required all applicants to provide a balance sheet and income statement.<sup>16</sup> The Commission also concluded that a performance bond could be required.<sup>17</sup> AT&T recommends that same requirements apply to establish minimum fitness standards for bidders of B-Fund support.

**VI. Conclusion**

AT&T agrees with the Ruling that it is important to craft the “Basic Telephone Service” requirements to “promote competitive and technological neutrality, consistent with the Commission’s Universal Service policies,” and supports doing so by minimizing the requirements for basic service, and then evaluating separately whether there are any additional requirements needed in any particular public policy program. In this way, the basic service definition can embrace multiple technologies, and the Commission will continue to have the flexibility it needs to achieve its goals within each of the particular programs.

Dated: May 28, 2010

Respectfully submitted,

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<sup>15</sup> *Re Approval of the California Advanced Services Fund (CASF) Application Requirements and Scoring Criteria for Awarding CASF Funds*, Resolution T-17143, p. 18 (June 12, 2008).

<sup>16</sup> *Id.*

<sup>17</sup> *Id.* at 12.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the **COMMENTS OF PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T CALIFORNIA (U 1001 C); AT&T ADVANCED SOLUTIONS, INC. (U 6346 C); AT&T COMMUNICATIONS OF CALIFORNIA, INC. (U 5002 C); TCG SAN FRANCISCO (U 5454 C); TCG LOS ANGELES, INC. (U 5462 C); TCG SAN DIEGO (U 5389 C); AND AT&T MOBILITY LLC (NEW CINGULAR WIRELESS PCS, LLC (U 3060 C); CAGAL CELLULAR COMMUNICATIONS (U 3021 C); SANTA BARBARA CELLULAR SYSTEMS LTD. (U 3015 C); AND VISALIA CELLULAR TELEPHONE COMPANY (U 3014 C)) ON PROPOSED REVISIONS TO THE DEFINITION OF “BASIC TELEPHONE SERVICE”** in **R.09-06-019** by electronic mail, U.S. mail, and/or by hand-delivery to the persons on the official Service List.

Executed this 28th day of May, 2010 at San Francisco, California.

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