

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298**FILED**04-03-07  
02:40 PM

April 3, 2007

Agenda ID #6554  
Quasi-Legislative

## TO PARTIES OF RECORD IN RULEMAKING 04-12-001

This is the proposed decision of Administrative Law Judge (ALJ) Jones. It will not appear on the Commission's agenda for at least 30 days after the date it is mailed. The Commission may act then, or it may postpone action until later.

When the Commission acts on the proposed decision, it may adopt all or part of it as written, amend or modify it, or set it aside and prepare its own decision. Only when the Commission acts does the decision become binding on the parties.

Parties to the proceeding may file comments on the proposed decision as provided in Article 14 of the Commission's Rules of Practice and Procedure (Rules), accessible on the Commission's website at [www.cpuc.ca.gov](http://www.cpuc.ca.gov). Pursuant to Rule 14.3, opening comments shall not exceed 15 pages.

Comments must be filed either electronically pursuant to Resolution ALJ-188 or with the Commission's Docket Office. Comments should be served on parties to this proceeding in accordance with Rules 1.9 and 1.10. Electronic and hard copies of comments should be sent to ALJ Jones at [kaj@cpuc.ca.gov](mailto:kaj@cpuc.ca.gov) and the assigned Commissioner. The current service list for this proceeding is available on the Commission's website at [www.cpuc.ca.gov](http://www.cpuc.ca.gov).

/s/ JANET A. ECONOME for  
Angela K. Minkin, Chief  
Administrative Law Judge

ANG:hl2

Attachment

Decision **PROPOSED DECISION OF ALJ JONES** (Mailed 4/3/2007)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking Into  
Implementation of Federal  
Communications Commission Report and  
Order 04-87, as it Affects the Universal  
Lifeline Telephone Service Program.

Rulemaking 04-12-001  
(Filed December 2, 2004)

**DECISION ADOPTING STRATEGIES TO IMPROVE THE CALIFORNIA  
LIFELINE CERTIFICATION AND VERIFICATION PROCESSES,  
AND REINSTATING PORTIONS OF GENERAL ORDER 153****I. Summary**

This decision adopts modifications to General Order (GO) 153 to improve the California LifeLine certification and verification processes. It also reinstates portions of GO 153 relating to the annual LifeLine verification process that were suspended by Assigned Commissioner Ruling (ACR) on November 1, 2006. The Commission subsequently ratified that ACR in Decision (D). 06-11-017. Finally, we approve strategies (beyond GO 153) to improve the LifeLine process, including commencement of a Phase II of this docket to address longer-term solutions and delegate authorization to the assigned Commissioner to take the steps necessary, working with staff, to ensure full implementation of the directives in this decision.

## II. Background

Pursuant to California Public Utilities Code Article 8,<sup>1</sup> LifeLine provides discounted residential wireline telephone service to eligible low-income Californians.<sup>2</sup> As many of 6.7 million or even 10.1 million Californians may qualify for LifeLine. Currently, carriers provide the discounted service to nearly 3.5 million Californians at a cost of \$304.5 million annually in federal funds, and \$251.35 million annually in state LifeLine funds.

In Decision (D.) 05-04-026, the Commission took the initial steps necessary to ensure that the state would continue to receive the annual federal Lifeline/Link-Up funds to protect the financial viability of the Universal Lifeline Telephone Service (ULTS) or California LifeLine program. Specifically, that decision adopted a program of initial income certification and annual verification, as required by the Federal Communications Commission's (FCC) Lifeline Order.<sup>3</sup>

The certification process is for new LifeLine customers; it requires potential new customers to provide proof of program eligibility by providing income documentation or by self-certifying participation in one of several approved assistance programs. The verification process occurs annually for

---

<sup>1</sup> Article 8 of the Public Utilities Code, also known as the Moore Universal Telephone Service Act, requires the Commission to implement lifeline telephone service to meet minimum residential communications needs. Minimum residential communications needs include, but are not limited to, the ability to originate and receive calls and the ability to access electronic information services.

<sup>2</sup> The Commission reviews and adopts annual income limits for the LifeLine Program.

<sup>3</sup> *Lifeline and Link-Up Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 03-109, FCC 04-87 (rel. April 29, 2004).

existing LifeLine customers; this process requires current LifeLine customers to self-certify annually as to their continued eligibility on either an income basis or via participation in a recognized assistance program. The verification process requires customers to complete and return LifeLine forms to the certifying agent, self-certifying their eligibility.

In D.05-12-013 and in Resolution T-16996, the Commission adopted revisions to GO 153 necessary to implement changes to the LifeLine program. The Telecommunications Division<sup>4</sup> issued a Request for Proposal (RFP) and entered into a contract with Solix, Inc. (Solix) to serve as third-party certifying agent (CertA) for the certification and verification process. The Commission implemented the new certification/verification process on July 1, 2006.

The annual verification process calls for verifying the continued eligibility of the approximately 3.5 million customers currently enrolled in the LifeLine program. Shortly after implementing the new program, Commission staff found that the customer response to the LifeLine verification notice was extremely low: in August 2006, 29% returned the verification notice; by the end of September, the percentage was only 49%. According to the telephone carriers that previously administered the LifeLine process prior to the federal changes, they experienced response rates of over 70%.<sup>5</sup>

Under the Commission's new process, those customers who did not respond to the verification notice were sent a letter informing them that they

---

<sup>4</sup> The Telecommunications Division is now known as the Communications Division.

<sup>5</sup> The carrier response rates are not strictly comparable to current response rates since the program was administered differently at that time and only required that customers self-certify their income eligibility.

were being removed from the LifeLine program and would be required to pay regular telephone rates. Those who received the denial letters could appeal the denial to the Consumer Affairs Branch (CAB) at the Commission. Since adoption of the new LifeLine verification system, customer phone calls and complaints to CAB and the carriers have increased significantly. By October 2006, CAB was receiving 300-500 letters per day from customers appealing their elimination from the LifeLine program.

On November 1, 2006 Commissioner Dian M. Grueneich issued an Assigned Commissioner's Ruling (ACR or November ACR), temporarily suspending portions of GO 153 relating to the annual LifeLine verification process. The suspension, which was instituted for a period not to exceed six months, has provided Commission staff an opportunity to identify the reasons for the low response rate and take steps to solve the problems.

The November ACR also ordered Commission staff to hold a workshop including telephone carriers, Solix, and other interested parties to discuss solutions to the verification form response rate problem. The Commission ratified the November ACR in D.06-11-017 on November 9, 2006.

In compliance with D.06-11-017, staff convened workshops on November 13-14, 2006. Problems associated with the verification process were identified and two working groups, the Implementation Working Group and the Marketing Working Group, were established. The Implementation Working Group meets on a weekly basis to discuss and find solutions to the low response rate for the verification process, while the Marketing Working Group meets regularly to develop marketing strategies and improve customer recognition of California LifeLine changes.

The above discussion has focused on the LifeLine verification process. Towards the end of 2006 it became clear that there was a growing problem with the certification process. Currently, the percentage of certification forms returned is about 46%, compared to 49% for verification forms.<sup>6</sup>

One contributing factor to the low certification response rate appears to have been problems with the carrier-customer interaction when new LifeLine customers are signed up. Between January 29, 2007 and the end of February 2007, CAB staff conducted approximately 50 calls to Verizon California Inc. (Verizon) and Pacific Bell Telephone Company d/b/a AT&T California (AT&T) call centers to determine whether customers receive correct and complete information regarding the California LifeLine program. In nearly half of the calls, the AT&T and Verizon representatives provided incomplete or inaccurate information on the program. GO 153 requires carriers to provide information on the LifeLine program to customers. The Consumer Protection Services Division has initiated an investigation into the practices of the AT&T and Verizon call centers to determine whether both carriers are complying with GO 153.

Further, customers who applied for the LifeLine discount but were rejected were being charged a conversion/regrade charge when they are placed back into a non-LifeLine residential service rate. This does not comply with GO 153 § 5.4.4. On February 28, 2007, Commissioner Grueneich issued a second ACR directing AT&T and Verizon to comply immediately with GO 153 and

---

<sup>6</sup> *Report on Strategies to Improve the California LifeLine Certification and Verification Process*, California Public Utilities Commission, April 2, 2007, p. 45 (Appendix A to this decision). The data include actual results July 1, 2006 through February 2007.

D.06-11-017 and set follow-up actions. The February ACR requires carriers to hold customers harmless from the imposition of all charges that would otherwise not accrue pursuant to the certification process of GO Section 5.4.4, and directs carriers to charge customers only those charges specified in the GO, which are as follows: previously waived or discounted charges, service initiation charges, end user common line charges, taxes, and surcharges associated with LifeLine discounts.

On March 2, 2007, AT&T filed a motion for clarification of certain aspects of the February ACR. On March 26, 2007, AT&T made a further filing, saying that in its March 2, 2007 motion, AT&T had argued based on the language of GO 153 § 5.4.4 and its tariffs, that the LifeLine certification process authorized a conversion charge for those customers who fail the certification process. Based on conversations with Commission staff and further review, AT&T concluded that the arguments advanced in those pages of the motion were in error, and AT&T withdrew them.

On March 28, 2007, Commission Grueneich issued a third ACR (March ACR), clarifying that D.06-07-017 suspended only the verification process, not the certification process. The March ACR also clarifies paragraphs seven and eight of the February ACR and directs AT&T to comply immediately with paragraphs seven and eight of the February ACR, as clarified. Although AT&T withdrew its argument that the LifeLine certification process authorized a conversion charge for those customers who fail the certification process, the March ACR clarified that GO 153 Section 5.4.4 does not allow for such a

conversion charge. The March ACR notes that D.05-12-013<sup>7</sup> expressly prohibits such charges for new LifeLine customers who fail to qualify for the program.

### **III. Action Plan to Improve the LifeLine Certification and Verification Processes**

As a result of the November ACR, staff has been working diligently with the carriers, Solix, and other interested parties to identify the reasons for the low response rates for certification and verification and to develop strategies to improve the processes. Assigned Commissioner Grueneich with the assistance of Executive Director Steve Larson and staff, held an all-party meeting on March 8, 2007 to hear directly from staff, carriers, Solix, and other interested parties on continuing problems and steps being undertaken to address those problems.

On April 2, 2007, Commission staff completed work on a comprehensive study of the issues, "Report on Strategies to Improve the California LifeLine Certification and Verification Processes" (Staff Report). Many of the recommendations in the Staff Report result from the working groups established pursuant to D.06-11-017.

The Staff Report is attached as Appendix A to this decision. The Staff Report stands on its own, and it is not necessary for us to restate all of the information contained there in this decision. By and large, staff's review since November 1, 2006 has determined that both new customers applying for the LifeLine program and existing customers verifying their continued eligibility are being disqualified for reasons other than not meeting income or social service

---

<sup>7</sup> D.05-12-013 approved modifications to General Order 153.

program requirements. Based on work with LifeLine customers, consumer groups, Solix, and carriers, staff has identified a variety of problems contributing to the low lifeline response rates and affecting customer enrollment in the program. They include:

- Late receipt or non-receipt of LifeLine forms and documents sent by Solix to customers;
- Database interface issues between carriers and Solix;
- Issues with the information both Solix and carriers provide to customers about the LifeLine process;
- Insufficient outreach to customers on the new federal requirements; and
- Lack of customer recognition of new program administration by a third party (Solix).

As the Staff Report explains, there is no single, simple solution to resolve the problems with the LifeLine program. Rather, a plethora of strategies, short- and longer-term must be pursued. Some of those strategies involve formal Commission action, such as we take today and will pursue in Phase II of this docket, and some involve continued focus by our staff and other interested parties, as described below and in the attached Staff Report.

#### **A. Short-term Strategies**

Various short-term strategies are necessary to address program suspension issues. Some of these elements are already in progress, while others require Commission approval. Those strategies include five major elements:

- Amendments to GO 153 and decision clarification;
- An amendment to the contract with Solix that outlines and funds changes in the administrative and marketing activities that Solix will conduct;
- Increased short-term outreach efforts;

- Short-term Solix-carrier interface improvements; and
- Customer-carrier interface solutions.

### **1. General Order and Decision Clarification**

Staff recommends amending GO 153 to improve the LifeLine response rate from customers as well as the processing of their program eligibility. Staff states that the GO should be amended to allow for more time to return and process the LifeLine forms, provide more reminders to customers from the certifying agent and carriers, and broaden the types of documentation permissible under the LifeLine program. Staff also proposes that the Commission allow it to make further amendments to the GO via the resolution process as long-term solutions to the mailing and other issues are identified and changes to the GO are warranted.

#### **a) Mailing and Response Delays**

Both carriers and CAB staff have reported LifeLine customer complaints of delays in receiving or of non-receipt of LifeLine certification and verification forms and other correspondence from Solix. Recent information indicates that the mail reaches LifeLine customers in 8 to 14 days. Since standard mail delivery is not guaranteed, the Commission has no guarantee that LifeLine forms and documents are delivered to addressees nor that undelivered mail is returned to Solix.

In addition, Solix has reported untimely receipt of a significant number of certification and verification forms. Currently, GO 153 mandates that customers return completed certification and verification forms to CertA within 30 days from the date that they were mailed to customers. If a form is received after the end of the 30-day period, the customer is disqualified from the LifeLine program for "non-response." Between July 1, 2006 and December 17, 2006, Solix received

a total of 22,783 certification forms and 58,412 verification forms after 34 days. Of those late responses, 82% of the certification forms and 77% of the verification forms were received within 60 days.

Mailing delays may also impact the ability of LifeLine applicants to correct deficiencies on their form to avoid disqualification. Currently, GO 153 provides 15 days for customers to correct problems with their certification and verification forms, as identified by the CertA. If customers do not return the correction to the CertA in that time period, they are disqualified from the LifeLine program. Clearly, if the requests for correction are not getting to customers on a timely basis, (given a mail delivery timeframe of up to 14 days) then LifeLine customers do not have sufficient time to make corrections and return them to Solix within the currently required 15 days.

Given the above issues, staff proposes to amend Appendix E of GO 153 for the return and processing of LifeLine forms as follows:<sup>8</sup>

*Certification Form Return and Review*

- Delay customer reminder from CertA to return forms by seven days to offset mailing delays;
- Increase the timeframe for new customers to return certification forms from 30 to 44 days;
- Add an eight-day grace period for the late receipt of certification forms.

*Verification Form Return and Review*

- Mail verification forms to existing customers 104 days prior to their anniversary dates instead of 60 days prior;

---

<sup>8</sup> Staff's proposed changes to Appendix E, "Timeline for Processing Customer's ULTS Qualification" appear as Attachment 1 to the Staff Report.

- If verification form is not received within 44 days, send second form to customer and allow another 21 days to return it.

*Lifeline Form Corrections*

- Expand the timeframe for customers to correct problems with their certification and verification forms from 15 to 22 days.

We see these changes as a key element to improving the response rate for both certification and verification. In light of the problems with standard mailing, it is critical that customers have additional time to respond. We will adopt staff's proposed revisions to Appendix E of GO 153.

Staff also asks for authority to make additional changes to the GO, as warranted by further study. We concur with staff's request. We hereby authorize staff to use the resolution process to present further changes to GO 153 for our consideration.

Staff acknowledges that while the changes to the GO do not address the problem that standard mail is not guaranteed to be delivered to customers, the changes do help remedy the problem of LifeLine customers being penalized with unwarranted disqualification due to untimely mail delivery.

**b) Remind and Notify Customers**

Staff has directed Solix to provide additional reminders and notifications to Lifeline customers to encourage them to complete and return the required forms. These additional reminders and notifications are included in the pending contract amendment described above. Correspondingly, staff recommends minor amendments to GO 153 to permanently include those additional reminders and notifications in the LifeLine qualification process. These changes to GO 153, which appear in Attachment 1 to the Staff Report, will require Solix, the certifying agent, to:

- Alert customers at the point when LifeLine certification and verification forms are mailed to them; and
- Provide additional reminders to LifeLine customers to complete and return certification and verification forms if the forms have not been received by the CertA within 21 days of mailing.

We support the use of additional methods to contact customers to encourage return of the forms. We adopt the proposed changes to GO 153 which are described above.

### **c) Clarify Allowable Income Documentation**

Staff has become aware of a problem relating to an undefined term in GO 153. Specifically, the GO sets forth a list of specific types of income documentation an applicant can submit to be determined eligible for the LifeLine program. The last item on the list is identified simply as “other official documents.”

Staff recommends that the Commission adopt a broad definition including categories of documents that will allow staff some discretion to review documents presented, and to develop some guidelines for what specific documents should be accepted. Specifically, staff recommends that the Commission deem documents from a state or federal agency or from a state or federal judicial or administrative court as “other official documents” for purposes of meeting the income verification requirements set forth in GO 153.

We concur with staff’s request that the language be clarified. However, since the document presented is to verify that the customer’s income meets the requirements for inclusion in the program, we specify that the documentation in question from a government agency or court should be one the purpose of which is to verify or establish income. With that caveat, staff is authorized to interpret

what specific documents can be included under the catchall phrase: “other official documents.”

## **2. Contract Amendment Initiatives**

The November 13-14, 2006 workshop and related working group meetings resulted in the identification of a number of issues contributing to the low LifeLine response rates as well as potential solutions to those issues. Because the recommended solutions are procedural changes that were not envisioned and were not included in the existing contract, a contract amendment is required both to incorporate those process changes in Solix’s administrative activities as well as to provide \$10.496 million in additional funding. The contract amendment is subject to the Department of General Services’ (DGS) guidelines on Non-Competitive Bids (NCB). An NCB request has been sent to the DGS, and as of March 21, 2007, the NCB was approved by DGS. This means that the Commission has received approval to amend the contract. The next step is for the Commission to send the contract amendment to the Office of Legal Services of DGS for approval.

The procedural changes contained in the contract amendment include improvements in the existing communication process with customers and other improvements such as:

- Changing the appearance of the envelopes;
- Using an outbound dialer to inform the customer that a certification or verification form has been sent to them and reminding the customer to return the certification/verification form;
- Implementing revisions to the form letters and certification and verification forms;
- Instituting changes in the verification process to allow a “soft” denial on the 45th day instead of an outright denial and using

the balance of the 60-day period prior to the customer's LifeLine anniversary date to get the customer to respond to the request for verification;

- Periodically updating and maintaining Solix's Interactive Voice Recognition (IVR) system; and
- Creating a "True Up" file for carriers to improve data reconciliation between carriers and Solix.<sup>9</sup>

The proposed changes appear to be a thoughtful approach to helping to solve the low response rate problem. Use of colored envelopes with special marking should help to alert recipients that this is not another piece of junk mail. We also support the use of the outbound dialer. The two calls made to customers will serve as a reminder to look for the specially-marked envelope in the mail and timely return the document.

Many of the recipients complained that they received their certification/verification notices too late to respond. We agree with staff's recommendation to extend the application processing time. Under the existing verification procedure, customers are sent verification forms 60 days before their anniversary date to recertify their continued participation in LifeLine. Failure to submit the forms on the 31<sup>st</sup> day is a cause for disqualification. Since there is insufficient time for the customers to respond, the timeline for the verification process will be revised by issuing a "soft" denial on the 45<sup>th</sup> day instead of the outright denial in the current process and using the balance of the 60-day period prior to the customer's anniversary date to get the participant to respond to the request for verification. Since the same issue is true for certification forms, the application processing time will also be extended, similar to that for verification.

---

<sup>9</sup> For a detailed description of these elements, see Staff Report, pp 23-25.

While extending the response time should help to increase the response rate, we are concerned with the use of standard mail, as opposed to first class mail, for these time-sensitive mailings. With standard mail, there is no guaranteed delivery, nor return to sender. This is not satisfactory in a program based on time-sensitive mailings. While we recognize there is no specific provision in the current contract requiring the use of first class mail, we order the Communications Division to explore mechanisms for faster guaranteed LifeLine mail delivery and incorporate those findings in any future amendment to the current contract, or future RFP.

These contract modifications should help to increase the response rates and we endorse them.

### **3. Short-Term Outreach Efforts**

The Staff Report points to customers' lack of awareness of the new LifeLine processes as a potential contributing factor to the low response rate. Staff identified that more "touches" or outreach efforts were needed to inform and educate customers of the program changes. Following is a list of short-term outreach measures already implemented or underway:

- **Educating Consumers and Involving Key Agencies**

On February 6, 2007, in recognition of Consumer Protection Week, the Commission issued a press release announcing the launch of a new initiative to educate consumers about the California LifeLine program. In addition, Commission staff, under the direction of Commissioner Grueneich, designed a brochure addressing the current issues with LifeLine phone service enrollment and verification. The brochure was sent to over 500 Community Based Organizations (CBOs) and government agencies, along with an invitation to contact the Commission to sign up for training on LifeLine issues.

- **Expanding Carrier Communications**

Commission staff, working with the Marketing Working Group, identified the need for additional outreach to customers informing them of the new LifeLine verification process. The Marketing Working Group, which is composed of carriers, consumer interest groups, Solix and staff, has been meeting on a regular basis to develop messages that will better inform LifeLine customers.

The Marketing Working Group is also developing correspondence (either a postcard or a letter) that will be sent by all carriers to their existing LifeLine customers informing them of the new LifeLine verification process. The correspondence, using both the carrier's name and the LifeLine name, will highlight the partnership between the carrier and the LifeLine program. The correspondence will be sent out to coincide with the re-launch of the verification program.

The Marketing Working Group is also working with carriers to ensure that the carriers send reminder material to new LifeLine customers informing them of the arrival of application forms and the need to return the completed forms in a timely manner. Since some carriers already send out confirmation letters to customers with similar information, the final details on this measure are still being developed.

Staff asks that the Commission formalize the requirement that carriers send reminders to new LifeLine customers in GO 153. Attachment 6 to the Staff Report contains a new GO Section 4.1.3 to implement this requirement.

It makes sense to us to include the reminder materials as part of the process to educate customers. We will require carriers to send the reminder

materials to new LifeLine customers. We modify GO 153 as shown in Attachment 6 of the Staff Report.

- **Improving LifeLine Outreach Materials**

The Marketing Working Group has developed language and format changes to the verification and certification instructions and application forms to more clearly and simply instruct customers. As soon as the contract amendment is approved, Solix will make the changes in the instructions and forms and place them into circulation. Unfortunately, the application form itself is a scanned document and cannot easily be modified without incurring millions of dollars in additional expense to reprogram the scanning equipment. Thus, no major modifications to the forms will be made at this time, but less extensive changes are being developed by staff in the short term. Staff recognizes that it is desirable to make some modification to the scanned portion of the application forms and recommends implementing changes as part of the next contract cycle (July 2008).

As mentioned earlier, lack of consumer familiarity with the LifeLine logo along with plain white envelopes containing the forms was identified as a possible contributing factor to the low response rate. Solix and Commission staff conducted an envelope trial mailing test in which six different envelopes were sent to LifeLine customers from late December 2006 through January 2007. Based on the results of the trial, Solix will send all future mailings in a pink envelope with no logo and the red message. The pending Solix contract amendment contains additional funding for this mailing option.

#### **4. Short-Term Solix-Carrier Interface Improvements**

In order to resolve issues with regard to the interface between Solix and carriers, Commission staff has been serving as mediators between Solix and

carriers, especially on database issues. Through this process, short-term fixes have been implemented. Staff will monitor their effectiveness going forward.

Since July 2006, staff has been working with Solix to improve the certification and verification process. Staff directed that these improvements be instituted based on feedback received from carriers, CAB staff and customers.

These changes include:

- Easing the application requirements on signatures and printing of applicant's name on the form;
- Making the IVR accessible to LifeLine customers using rotary phones;
- Modifying the IVR by rearranging prompts and introducing new prompts to make it easier for customers to obtain information and order new forms;
- Expanding the name field in Solix database to accommodate multiple name entries; and
- Correcting database errors that incorrectly disqualified LifeLine customers attempting to transfer to a new carrier.

In addition, since the start of the implementation of the new LifeLine process, Solix has encountered problems in its system that have impacted, among other things, its review of customer eligibility for the LifeLine program.<sup>10</sup> Staff has worked closely with Solix to solve those issues.

Solix must identify and rectify problems – especially any that impact LifeLine customers – as quickly as possible. Solix shall report any such system “glitches” to the Communications Division within 48 hours of when they are

---

<sup>10</sup> See Staff Report, pp 27-29 and Attachment 2 of the report for a complete description of the system problems.

discovered. We delegate to the assigned Commissioner the authority to work with staff and Solix in order to ensure speedy implementation of measures needed to correct problems in this area.

### **5. Customer-Carrier Interface Solutions**

CAB is the Commission's internal workgroup responsible for intake of informal complaints. With implementation of the new certification and verification processes, CAB was designated as the arbiter of any appeal that a customer has regarding Solix's determination that a customer is not qualified for the LifeLine program. The current process allows the CAB representative to uphold or overturn any decision by Solix regarding the customer's eligibility, after review of the case materials. Furthermore, CAB representatives are authorized to update the customer's status in the Solix database, which reflects the outcome of the customer's appeal. This information, in turn, is updated to the customer's carrier.

Most calls that CAB has received center around problems with both the verification and certification process where customers have not been able to complete the eligibility process within the specified deadlines. In many cases, this failure to act within deadlines has resulted in significant backbilling to the customer due to the difference between LifeLine service rates, basic service rates and other previous discounts in moving the customer from LifeLine service to basic service. Customers continue to contact CAB to dispute the backbilled charges and/or Solix's determination of ineligibility.

Because of the significant increase in CAB's workload related to LifeLine, CAB has established regular meetings with AT&T and Verizon to address customer-related issues. From July 2006 through the end of January 2007, CAB received 12,400 LifeLine appeals, with over 4,000 of those appeals still open.

This increase in the LifeLine case load has lead to increases in call volumes, call durations, and written appeals, and these have all reduced CAB's ability to respond to phone calls and resolve written complaints, both for LifeLine and for all other matters handled by CAB.

To address this need, CAB is in the process of setting up a special team to deal with LifeLine appeals and informal complaints. Also, the Commission's IVR has been reconfigured to direct customers away from "regular" complaint/inquiry channels into a specific LifeLine queue that will have automated responses to Frequently Asked Questions, and the ability to access a team representative. CAB also participates in the two Working Groups addressing LifeLine issues.

## **6. Reinstatement of Portions of GO 153**

In the preceding sections, we reviewed staff's short-term strategies for improving the response rates in the certification and verification processes. Where necessary, we have taken action to approve staff proposals. The staff's short-term strategies will improve both the certification and verification processes and help to increase the response rates. Therefore, we conclude that we should lift the suspension of those portions of GO 153 suspended in the November 1, 2006 ACR, as modified by D.06-11-017. We lift the suspension with the effective date of this order and order the resumption of the verification process.

### **B. Long-Term Strategies**

Staff recognizes that not all changes to the LifeLine program can be implemented in the short term and has identified several longer-term strategies to improve LifeLine program efficiency and effectiveness. These approaches (summarized in the attached Staff Report) include strategies to address issues

related to: mailings, outreach, non-response data, eligibility approvals, the data interface between Solix and carriers, synergies with other low income programs, and dealing with complaints and appeals. In addition, staff points out that California can learn a great deal from other states' experiences. Those long-term approaches build upon the short-term strategies described above.

We do not intend to micro-manage the LifeLine program, so we will not address most of the long-term strategies described in the report. We want to give staff the latitude, in conjunction with the Working Groups, to develop creative and successful solutions. We affirm that staff has the authority to continue to identify and implement longer-term strategies. To the extent that any of those elements require Commission authorization, staff should bring those issues to us for resolution. We will keep this proceeding open and authorize the assigned Commissioner to issue the directives needed to staff and carriers to ensure further pursuit of longer-term strategies.

Some long-term strategies may require a more formal review than that of the resolution process. We hereby direct the assigned Commissioner to commence a second phase of the current LifeLine docket to ensure that these strategies are expeditiously explored. In particular, we wish to review certification requirements to explore whether modification to these requirements could resolve issues experienced since implementation of the new procedures last year.

We want to be kept abreast of the progress of the revised system so we will require the Executive Director to report once a month at our scheduled Commission meetings on the status of the LifeLine program. Those reports should include a report on any problems encountered, and the steps taken to implement program improvements. Those reports should continue until the

assigned Commissioner determines that the program has stabilized and the reports are no longer necessary.

As part of the continued analysis of the program changes, we should ensure that Solix is correctly and completely implementing the changes as required by its contract and any subsequent amendments. We will require an audit of the Solix contract to ensure complete contract compliance. Staff should commence the audit within 30 days of the effective date of this order.

The synergies of having working groups comprised of staff, carriers, Solix and consumer groups were an invaluable tool in developing the creative proposals found in the Staff Report. Therefore, we will require that the Implementation Working Group and the Marketing Working Group continue to meet on a regular basis to discuss issues relating to the low response rates for the certification and verification processes. Consumer groups should be represented on both working groups so that staff has the benefit of their viewpoints and expertise.

#### **IV. The February 28, 2007 and March 28, 2007 ACRs**

Commissioner Grueneich's March 28, 2007 ACR provides clarification of the February 28, 2007 ACR. Today we ratify both the February 28, 2007 and March 28, 2007 ACRs.

#### **V. Comments on Proposed Decision**

The proposed decision of the ALJ in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and Rule 14.2(a) of the Commission's Rules of Practice and Procedure. Comments were filed on \_\_\_\_\_, and reply comments were filed on \_\_\_\_\_ by \_\_\_\_\_.

**Assignment of Proceeding**

Dian M. Grueneich is the assigned Commissioner and Karen A. Jones is the assigned ALJ in this proceeding.

**Findings of Fact**

1. Many LifeLine recipients complained that they received their certification or verification notices too late to respond.
2. With standard mail, there is no guaranteed delivery, nor return to sender.
3. Standard mail, standing alone, is not satisfactory in a program based on time-sensitive, short-deadline mailings.
4. The proposed modifications to Appendix E of GO 153 are a key element in improving the response rates for both certification and verification.
5. The low response rate is multi-faceted, so the resolution will be multi-faceted as well.
6. Staff needs to be informed of system problems – especially any that impact LifeLine customers – within 48 hours of when they are discovered.
7. Staff has identified problems that will require solutions beyond those that can be implemented in the short term.

**Conclusions of Law**

1. In light of the problems with standard mail, it is critical that customers have additional time to respond.
2. In order to respond quickly to problems, staff should make use of the resolution process to present further changes to the GO for Commission approval.
3. Since there is insufficient time for the customer to respond, the timeline for verification should be revised by issuing a “soft” denial on the 45<sup>th</sup> day, instead of the outright denial in the current process.

4. The additional reminders and notifications included in the contract amendment should encourage LifeLine customers to complete and return the required forms.
5. Staff should have the authority to interpret what specific documents can be included under the catchall phrase: "Other official document," with the caveat that the document in question should be one the purpose of which is to verify or establish income.
6. Carriers should send the reminder materials to new LifeLine customers.
7. Solix should identify and rectify problems impacting LifeLine customers as quickly as possible.
8. The contract modification described in the Staff Report should help to increase the response rates.
9. The steps outlined by staff under their short-term strategies will help to increase response rates.
10. The suspension of those portions of GO 153 suspended in the November 1, 2006 ACR, as modified by D.06-11-017, should be lifted.
11. Some long-term strategies may require a more formal review than that of the resolution process.
12. Commission staff should ensure that Solix is in compliance with its contract and any subsequent amendments.

## **O R D E R**

Therefore, **IT IS ORDERED** that:

1. The proposed changes to Appendix E of General Order 153 that appear in Attachment 1 of "Report on Strategies to Improve the California LifeLine Certification and Verification Processes" shall be adopted.

2. Staff is authorized to use the resolution process to present further changes to General Order 153 for the Commission's consideration.

3. General Order 153 shall be modified to include the proposed additional reminders and notifications to customers.

4. Staff is authorized to interpret what specific documents can be included under the catchall phrase: "other official documents." However, the documentation in question shall be one from a government agency or court the purpose of which is to verify or establish income.

5. The Communications Division shall explore mechanisms for faster guaranteed LifeLine mail delivery.

6. All telecommunications carriers subject to the provisions of General Order 153 shall send correspondence to existing LifeLine customers informing them of the new LifeLine verification process. The correspondence will be sent to coincide with the re-launch of the verification process. Carriers shall also send reminder materials to new LifeLine customers.

7. General Order 153 shall be modified to add Section 4.1.3, as it appears in Attachment 6 of the Staff Report. Section 4.1.3 requires carriers to send reminder notices to new LifeLine customers.

8. The assigned Commissioner shall work with the Communications Division and Solix to ensure timely implementation of measures to correct future problems with the LifeLine processes.

9. We lift the suspension of the following sections of General Order 153 which were suspended in the November 1, 2006 assigned Commissioner Ruling, as modified by Decision 06-11-017: Section 4.5, including Appendix C; 5.5; those portions of 6.3 and 6.4 as they relate to the annual verification process; 8.1.3 as it relates to customers who have not responded to the annual verification notice or

returned it late; Appendix C; and the portion of Appendix E titled "Existing ULTS Customers (Verification)." Those sections of General Order 153 shall be reinstated immediately, as of the date of this order.

10. The assigned Commissioner shall commence a second phase of this proceeding to review long-term strategies requiring formal review.

11. The Executive Director shall report at the Commission's first regularly scheduled meeting of each month on the status of the LifeLine program. Those reports, which should include information on any problems encountered, and the status of steps taken to implement program improvements, shall continue until the assigned Commissioner determines that they are no longer necessary.

12. Commission staff shall perform an audit of the Solix contract to ensure compliance with contract requirements. The audit shall commence within 30 days of the effective date of this order.

13. Commission Staff shall continue to hold regular meetings of the Implementation Working Group and the Marketing Working Group to discuss issues relating to the low response rates for the LifeLine certification and verification processes. Consumer groups shall be represented on both working groups.

14. The rulings made in the February 28, 2007 and March 28, 2007 assigned Commissioner's Rulings are confirmed, and adopted as orders of the Commission.

This order is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

**INFORMATION REGARDING SERVICE**

I have provided notification of filing to the electronic mail addresses on the attached service list.

Upon confirmation of this document's acceptance for filing, I will cause a Notice of Availability to be served upon the service list to this proceeding by U.S. mail. The service list I will use to serve the Notice of Availability is current as of today's date.

Dated April 3, 2007, at San Francisco, California.

/s/ ELIZABETH LEWIS  
Elizabeth Lewis

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Update on 20-MAR-2007 by: SMJ  
R0412001 INITIAL LIST

\*\*\*\*\* APPEARANCES \*\*\*\*\*

Josephine Wong  
APEX TELECOM INC.  
PO BOX 1917  
OAKLAND CA 94604

C. Hong Wong  
APEX TELECOM, INC.  
113 10TH STREET  
OAKLAND CA 94607  
(510) 521-2771  
hongwong@apexglobalnet.com

Anna Kapetanakos  
Attorney At Law  
AT&T CALIFORNIA  
525 MARKET STREET, ROOM 2024  
SAN FRANCISCO CA 94105  
(415) 778-1480  
anna.kapetanakos@att.com

Greta Banks  
DORETTA DEA  
AT&T COMMUNICATIONS OF CALIFORNIA  
525 MARKET STREET, 18TH FLOOR, 4  
SAN FRANCISCO CA 94105  
(415) 778-1271  
greta.banks@att.com

Brian Plackis Cheng  
BLUE CASA COMMUNICATIONS  
911 OLIVE STREET  
SANTA BARBARA CA 93101  
finance@bluecasa.com

Linda Burton  
DEBBIE BEHIE  
PO BOX 219  
OAKHURST CA 93644  
(559) 642-0229  
lindab@stcg.net

Joleen Hogan  
LORRIE BERNSTEIN  
CAL-ORE TELEPHONE COMPANY  
PO BOX 847  
DORRIS CA 96023  
joleen@cot.net

Yvonne Smythe  
CALAVERAS TELEPHONE COMPANY  
PO BOX 37  
COPPEROPOLIS CA 95228  
(209) 785-2211

Kimberly Kretchmer  
CITIZENS TELECOM COS OF CA/GS/TU  
180 S. CLINTON AVENUE  
ROCHESTER NY 14646-0400  
Kimberly.Kretchmer@frontiercorp.com

Margarita Gutierrez  
Deputy City Attorney  
CITY AND COUNTY OF SAN FRANCISCO  
1 DR. CARLTON B. GOODLETT PLACE, RM. 375  
SAN FRANCISCO CA 94102  
(415) 554-4632  
margarita.gutierrez@sfgov.org

John A. Gutierrez  
COMCAST  
12647 ALCOSTA BOULEVARD, SUITE 200  
SAN RAMON CA 94544  
(925) 973-7214  
john\_gutierrez@cable.comcast.com  
For: COMCAST PHONE OF CALIFORNIA LLC

Mark P. Schreiber  
E. GARTH BLACK, SEAN P. BEATTY,  
Attorney At Law  
COOPER, WHITE & COOPER, LLP  
201 CALIFORNIA STREET, 17TH FLOOR  
SAN FRANCISCO CA 94111  
(415) 433-1900  
mschreiber@cwclaw.com  
For: SureWest Telephone and SureWest Tele Video

Patrick M. Rosvall  
E. GARTH BLACK, JEFFREY F. BECK  
Attorney At Law  
COOPER, WHITE & COOPER, LLP  
201 CALIFORNIA STREET, 17TH FLOOR  
SAN FRANCISCO CA 94111  
(415) 433-1900  
smalllecs@cwclaw.com  
For: The Small LEC's

Latanya Linzie  
COX CALIFORNIA TELCOM, L.L.C.  
2200 POWELL STREET, SUITE 1035  
EMERYVILLE CA 94608  
(510) 923-6220  
LaTanya.Linzie@cox.com

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Update on 20-MAR-2007 by: SMJ  
R0412001 INITIAL LIST

Douglas Garrett  
Vice President, Western Region Regulator  
COX CALIFORNIA TELCOM, LLC, DBA COX COMM  
2200 POWELL STREET, SUITE 1035  
EMERYVILLE CA 94608-2618  
(510) 923-6222  
douglas.garrett@cox.com  
For: Cox California Telcom, LLC

Melissa W. Kasnitz  
MAZEN BASRAWI  
DISABILITY RIGHTS ADVOCATES  
2001 CENTER STREET, THIRD FLOOR  
BERKELEY CA 94704-1204  
(510) 665-8644  
pucservice@dralegal.org  
For: DISABILITY RIGHTS ADVOCATES

Eric Wolfe  
Regulatory  
DUCOR TELEPHONE COMPANY  
PO BOX 42230  
BAKERSFIELD CA 93384-2230  
For: DUCOR TELEPHONE COMPANY

W. Lee Biddle  
Attorney At Law  
FERRIS & BRITTON, P.C.  
401 WEST A STREET, SUITE 1600  
SAN DIEGO CA 92101  
(619) 233-3131  
lbiddle@ferrisbritton.com

Edward J Schneider, Jr  
FORESTHILL TELEPHONE CO., INC.  
4655 QUAIL LAKES DR.  
STOCKTON CA 95207  
ejs@ejschneider.com

Linda Cooper  
GLOBAL VALLEY NETWORKS, INC.  
515 KEYSTONE BLVD.  
PATTERSON CA 95363-8861  
(209) 394-4000  
carlar@gvni.net

John L. Clark  
Attorney At Law  
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP

Gail Long  
Telephone Company  
HAPPY VALLEY/HORNITOS/WINTERHAVEN  
PO BOX 1566  
OREGON OR 97045  
gail.long@tdstelecom.com

Erin Dawley  
HORNITOS TELEPHONE COMPANY  
PO BOX 5158  
MADISON WI 53705-0158

Dave Clark  
GLENDA KOUNTZ  
KERMAN TELEPHONE COMPANY  
811 S MADERA AVE.  
KERMAN CA 93630  
dclark@kermantelephone.com

Enrique Gallardo  
LATINO ISSUES FORUM  
160 PINE STREET, SUITE 700  
SAN FRANCISCO CA 94111  
(415) 547-7550  
enriqueg@lif.org

Louie De Carlo  
Compliance Manager  
MCI METRO ACCESS TRANSMISSION SERVICES  
201 SPEAR STREET, 9TH FLOOR  
SAN FRANCISCO CA 94105  
louie.decarlo@mci.com

David Moriarty  
MEDIA ONE/AT&T BROADBAND  
550 CONTINENTAL BLVD.  
EL SEGUNDO CA 90245

Lorrie Bernstein  
MOSS ADAMS LLP  
3121 WEST MARCH LANE, STE. 100  
STOCKTON CA 95219-2303  
lorrie.bernstein@mossadams.com  
For: PINNACLES TELEPHONE COMPANY

Olivia B. Wein  
Attorney At Law  
NATIONAL CONSUMER LAW CENTER  
1001 CONNECTICUT AVE., NW., STE. 510

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Update on 20-MAR-2007 by: SMJ  
R0412001 INITIAL LIST

505 SANSOME STREET, SUITE 900  
SAN FRANCISCO CA 94111  
(415) 765-8443  
jclark@gmssr.com  
For: BLUE CASA COMMUNICATIONS

WASHINGTON DC 20036  
(202) 452-6252  
owein@nclcdc.org  
For: NATIONAL CONSUMER LAW CENTER

Lynne Martin  
PAC-WEST TELECOMM, INC.  
1776 MARCH LANE, SUITE 250  
STOCKTON CA 95207  
lmartin@pacwest.com

Glenn Stover  
CAMILLE ESTES  
Attorney At Law  
STOVER LAW  
221 MAIN STREET, SUITE 800  
SAN FRANCISCO CA 94105-1906  
(415) 495-7000  
glenn@stoverlaw.net  
For: Adir Internation Export Ltd. dba La Curacao

Peter M. Hayes  
General Manager  
PACIFIC BELL TELEPHONE COMPANY  
140 NEW MONTGOMERY ST., RM 922  
SAN FRANCISCO CA 94105  
(415) 542-7824  
peter.hayes@sbc.com

Gladys K. Strong  
Specialist-Regulatory  
600 HIDDEN RIDGE - HQE02E88  
IRVING TX 75038  
(972) 718-0626  
gladys.strong@verizon.com  
For: VERIZON CALIFORNIA INC.

Lorrie Bernstein  
PINNACLES TELEPHONE COMPANY  
340 LIVE OAK ROAD  
PAICINES CA 95043-9998

Linda Lupton  
Regulatory Manager  
SUREWEST TELEPHONE  
PO BOX 969  
ROSEVILLE CA 95678  
(916) 786-1677  
l.lupton@surewest.com

Karl Andrew  
Regulatory Affairs  
SAGE TELECOM, INC.  
805 CENTRAL EXPRESSWAY SO, STE 100  
ALLEN TX 75013-2789

Sean Wilson  
TALK.COM  
12020 SUNRISE VALLEY, STE.250  
RESTON VA 20191

Robert B. Ryan  
SBC  
140 NEW MONTGOMERY, ROOM 1909  
SAN FRANCISCO CA 94105

Sharon Thomas  
TECHNOLOGIES MANAGEMENT, INC.  
210 N. PARK AVE.  
WINTER PARK FL 32789  
(407) 740-8575  
sthomas@tminc.com  
For: Talk America Inc.

Joy C. Yamagata  
Regulatory Case Manager  
SEMPRA UTILITIES  
8330 CENTURY PARK COURT CP 32 D  
SAN DIEGO CA 92123  
(858) 654-1755  
JYamagata@semprautilities.com

Peter Glass  
STEVE BEATTY  
SEREN INNOVATIONS, INC.  
15 SOUTH 5TH STREET, STE 500  
MINNEAPOLIS MN 55402  
Peter.M.Glass@xcelenergy.com

Jeff Compton  
Vice Resident Carrier Relations  
TELSCAPE COMMUNICATIONS INC.  
606 EAST HUNTINGTON DRIVE  
MONROVIA CA 91016

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Update on 20-MAR-2007 by: SMJ  
R0412001 INITIAL LIST

Jeff Schnur  
SOLIX INC.  
PO BOX 902  
100 S. JEFFERSON ROAD  
WHIPPANY NJ 07981  
(973) 884-8383  
jschnur@solixinc.com

(626) 415-1016  
jcompton@telscape.net

Thalia N.C. Gonzalez  
Legal Counsel  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVE., 2ND FLOOR  
BERKELEY CA 94704  
(510) 926-4026  
thaliag@greenlining.org  
For: THE GREENLINING INSTITUTE

Dan Douglas  
MINDY DUALL  
THE PONDEROSA TELEPHONE CO.  
PO BOX 21  
O'NEALS CA 93645  
dand@ponderosatel.com

Mary Pharo  
VAR TEC TELECOM, INC.  
1600 VICEROY DRIVE  
DALLAS TX 75235

James Lowers  
DENISE REYNOLDS  
THE SISKIYOU TELEPHONE COMPANY  
PO BOX 157  
ETNA CA 96027  
jtlowers@sisqtel.net

Jacque Lopez  
Legal Assistant  
VERIZON CALIFORNIA INC  
CA501LB  
112 LAKEVIEW CANYON ROAD  
THOUSAND OAKS CA 91362  
(805) 372-6664  
jacque.lopez@verizon.com

Christine Mailloux  
Attorney At Law  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO CA 94102  
(415) 929-8876  
cmailloux@turn.org  
For: THE UTILITY REFORM NETWORK

Lorraine A. Kocen  
VERIZON CALIFORNIA INC.  
112 S. LAKEVIEW CANYON ROAD  
THOUSAND OAKS CA 91362  
(805) 372-6945  
lorraine.kocen@verizon.com  
For: VERIZON CALIFORNIA INC.

Regina Costa  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, SUITE 350  
SAN FRANCISCO CA 94102  
(415) 929-8876 X312  
rcosta@turn.org  
For: THE UTILITY REFORM NETWORK

Don Eachus  
VERIZON CALIFORNIA, INC.  
CA501LB  
112 S. LAKE LINDERO CANYON ROAD  
THOUSAND OAKS CA 91362  
(805) 372-7276  
don.eachus@verizon.com

Rose Cullen  
THE VOLCANO TELEPHONE COMPANY  
PO BOX 1070  
PINE GROVE CA 95665-1070

Jesus G. Roman  
Attorney At Law  
VERIZON CALIFORNIA, INC.  
112 S. LAKEVIEW CANYON ROAD, CA501LB  
THOUSAND OAKS CA 91362  
(805) 372-6233  
jesus.g.roman@verizon.com  
For: VERIZON CALIFORNIA, INC.

Kristie Flippo  
TIME WARNER CONNECT  
15303 DALLAS PARKWAY, SUITE 610

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Update on 20-MAR-2007 by: SMJ  
R0412001 INITIAL LIST

ADDISON TX 75001  
kristie.flippo@twtelecom.com

Michael Shames  
Attorney At Law  
UTILITY CONSUMERS' ACTION NETWORK  
3100 FIFTH AVENUE, SUITE B  
SAN DIEGO CA 92103  
(619) 696-6966  
mshames@ucan.org  
For: TURN

Karen Bailey  
Verizon West Coast  
VERIZON CALIFORNIA, INC.  
HQE01G69  
600 HIDDEN RIDGE DR., E01E55  
IRVING TX 75038-2092  
(972) 718-5295  
k.bailey@verizon.com

Michael Morcom  
VERIZON SELECT SERVICES, INC.  
600 HIDDEN RIDGE, HQE01J016  
IRVING TX 75038

Thalia R. Gietzen  
VYCERA COMMUNICATION, INC.  
12750 HIGH BLUFF DR., STE.200  
SAN DIEGO CA 92130-2565

Dale Dixon  
Attorney At Law  
VYCERA COMMUNICATIONS, INC.  
12750 HIGH BLUFF DRIVE, SUITE 200  
SAN DIEGO CA 92129  
(858) 792-2400  
ddixon@vycera.com

Ross A. Buntrock  
WOMBLE CARLYLE SANDRIDGE & RICE PLLC  
1401 EYE STREET, N.W. SEVENTH FLOOR  
WASHINGTON DC 20005  
(202) 857-4479  
rbuntrock@wcsr.com  
For: FONES4ALL

Sindy J. Yun  
Legal Division  
RM. 4300  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-1999  
sjy@cpuc.ca.gov

\*\*\*\*\* STATE EMPLOYEE \*\*\*\*\*

Natalie Billingsley  
Division of Ratepayer Advocates  
RM. 4108

Hazlyn Fortune  
Energy Division  
AREA 4-A  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-1809  
hcf@cpuc.ca.gov

Jessica T. Hecht  
Administrative Law Judge Division  
RM. 5113  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-2027  
jhe@cpuc.ca.gov

Risa Hernandez  
Communications Division  
AREA 3-D  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-1778  
rhh@cpuc.ca.gov

Karen Jones  
Administrative Law Judge Division  
RM. 2106  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-1483  
kaj@cpuc.ca.gov

Donna L. Wagoner  
Water Division

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

Last Update on 20-MAR-2007 by: SMJ  
R0412001 INITIAL LIST

505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-1368  
nxb@cpuc.ca.gov

Cherrie Conner  
Communications Division  
AREA 3-D  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-2767  
chr@cpuc.ca.gov

Karen A. Degannes  
Energy Division  
AREA 4-A  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-2575  
kdg@cpuc.ca.gov

Angela Young  
Information & Management Services Divisi  
AREA 3-E  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-2837  
ayy@cpuc.ca.gov

\*\*\*\*\* INFORMATION ONLY \*\*\*\*\*

Nelsonya Causby  
Attorney At Law  
AT&T CALIFORNIA  
525 MARKET ST., STE 2025  
SAN FRANCISCO CA 94105  
(415) 778-1488  
nelsonya.causby@att.com

Esther Northrup  
COX CALIFORNIA TELCOM  
5159 FEDERAL BLVD.  
SAN DIEGO CA 92105  
(619) 266-5315  
esther.northrup@cox.com  
For: COX CALIFORNIA TELCOM

Suzanne Toller  
Attorney At Law  
DAVIS WRIGHT TREMAINE LLP

AREA 3-C  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-1942  
dlw@cpuc.ca.gov

Josie Webb  
Energy Division  
AREA 4-A  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-1966  
wbb@cpuc.ca.gov

Sean Wilson  
Water Division  
AREA 3-C  
505 VAN NESS AVE  
San Francisco CA 94102 3298  
(415) 703-1818  
smw@cpuc.ca.gov

Charles E. Born  
Manager-State Government Affairs  
FRONTIER, A CITIZENS TELECOMMUNICATIONS  
PO BOX 340  
ELK GROVE CA 95759  
(916) 686-3570  
cborn@czn.com

Glennnda Kountz  
Regulatory Assistant  
KERMAN TELEPHONE CO.  
811 S. MADERA AVENUE  
KERMAN CA 93630  
(559) 846-4872  
gkountz@kermantelephone.com

Law Department File Room  
PACIFIC GAS AND ELECTRIC COMPANY  
PO BOX 7442  
SAN FRANCISCO CA 94120-7442  
cpuccases@pge.com

Julie Weigand  
RICHARD HEATH AND ASSOCIATES, INC.  
590 W. LOCUST AVENUE, SUITE 103  
FRESNO CA 93650  
(559) 447-7000  
julie@rhainc.com

\*\*\*\*\* SERVICE LIST \*\*\*\*\*

**Last Update on 20-MAR-2007 by: SMJ  
R0412001 INITIAL LIST**

505 MONTGOMERY STREET, SUITE 800  
SAN FRANCISCO CA 94111-6533  
(415) 276-6500  
suzannetoller@dwt.com

Bettina Cardona  
President  
FONES4ALL CORPORATION  
6320 CANOGA AVE, SUITE 650  
WOODLAND HILLS CA 91367  
(818) 615-0100  
bettina@fones4all.com

Joe Chicoine  
Manager, State Government Affairs  
FRONTIER COMMUNICATIONS  
PO BOX 340  
ELK GROVE CA 95759  
(916) 686-3588  
jchicoine@czn.com

Adrienne M. Mercer  
Regulatory Compliance Analyst  
SAGE TELECOM, INC.  
805 CENTRAL EXPRESSWAY S, STE 100  
ALLEN TX 75013  
(972) 747-4004

Robert Gnaizda  
Policy Director/General Counsel  
THE GREENLINING INSTITUTE  
1918 UNIVERSITY AVENUE, SECOND FLOOR  
BERKELEY CA 94704  
(510) 926-4006  
robertg@greenlining.org

Margaret L. Tobias  
Attorney At Law  
TOBIAS LAW OFFICE  
460 PENNSYLVANIA AVENUE  
SAN FRANCISCO CA 94107  
(415) 641-7833  
marg@tobiaslo.com