BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking on the Commission's Own Motion to Assess and Revise the Regulation of Telecommunications Utilities	R.05-04-005 (URF Phase II)
Rulemaking for the Purposes of Revising General Order 96-A Regarding Informal Filings at the Commission	R.98-07-038 (GO 96-A)

COX CALIFORNIA TELCOM, L.L.C., DBA COX COMMUNICATIONS, APPLICATION FOR REHEARING OF DECISION 07-09-019, OPINION ADOPTING TELECOMMUNICATIONS INDUSTRY RULES

I. Background and Standard of Review.

Cox California Telcom, LLC, d/b/a Cox Communications (U-5684-C) ("Cox Communications") hereby submits this application for rehearing of Decision 07-09-019, Opinion Adopting Telecommunications Industry Rules ("GO 96-B Decision"). Concurrently, Cox is filing an application for rehearing of Decision 07-09-018 ("URF Phase 2 Decision" and collectively with the GO 96-B Decision will be referred to as the "Decisions"). In the GO 96-B Decision, the Commission expressly adopted Cox's proposal that permitted advice letters proposing any type of changes in terms or conditions, whether more or less restrictive, to be filed as Tier 1 advice letters.[1] Cox now requests that the Commission modify and delete certain language in the Decisions that contradicts Cox's Tier 1 Proposal.

The URF Phase 2 Decision is another step in implementing the Commission's goals and policies of the Uniform Regulatory Framework and resolves a number of issues not decided in D.06-08-030 ("URF Phase 1 Decision"). In addition to adopting rules governing permissive detariffing, the URF Phase 2 Decision clarifies rules governing advice letters filings within the context of the three-tier advice letter structure adopted in Decision 07-01-024. The companion decision, implementing revisions to GO 96-B, completes the Commission's review and implementation of advice letter rules for the telecommunications industry. Both decisions are subject to rehearing because they overlap in requiring CLECs to file more restrictive terms for their basic service offering via Tier 3 advice letters. Neither decision provides any support for this requirement and the adopted rule contradicts well-supported findings in the Decisions.

The Decisions properly grants ILECs (other than the small LECs) and CLECs the necessary flexibility to file most advice letters on a Tier 1 basis. This approach is consistent with the lighter

[1] The proposal was included in comments that Cox jointly filed with Time Warner and XO and for purposes of these Applications for Rehearing will be referred to as "Cox's Tier 1 Proposal."

regulatory approach adopted in the URF Phase 1 Decision for both ILECs and CLECs. This approach is also consistent with the regulatory regime applicable to CLECs as they have always enjoyed pricing flexibility befitting their status as new market entrants with no captive customers, and lesser regulation of their terms and conditions.[2] To be sure, CLECs have not been required to obtain approval via a Commission resolution for tariff changes that impose more restrictive changes on a regulated service, including basic service.

While the Commission expressly adopted Cox's Tier 1 Proposal that allows CLECs to continue making changes to tariffs via advice letters that do not require a Commission resolution, both Decisions include erroneous text that contradicts this conclusion. The erroneous text is also captured in Telecom Rule 7.1(5).[3] The Decisions are void of substantive support for the erroneous text and there is no basis in either prior Commission practice or the record in this proceeding for the adoption of the requirement as written. Because the text was added after the proposed decisions were issued for public comment on July 23, 2007, Cox surmises that the Commission inadvertently incorporated the erroneous text when drafting revisions to the final decision in response to parties' comments on other matters. Consistent with the Rule 16(c), Cox requests that the Commission correct the URF Phase 2 Decision by deleting the erroneous text.

Rule 16(c) sets for the standard for review for this Application as follows:

> Applications for rehearing shall set forth specifically the grounds on which the applicant considers the order or decision of the Commission to be unlawful or erroneous, and must make specific references to the record or law. The purpose of an application for rehearing is to alert the Commission to a legal error, so that the Commission may correct it expeditiously.

In addition, Section 1757.1[4] provides that a final Commission decision issued in a quasi-legislative proceeding will be overturned if it is not supported by the findings or if the Commission did not follow the proper process. Cox demonstrates below that there is erroneous text in the GO 96-B Decision that is not supported by factual or legal findings and that otherwise contradicts the properly supported and adopted conclusions in the Decisions. Additionally, if not revised, this erroneous text would have the Commission unlawfully modify an existing rule without giving carriers proper advance notice. This is procedurally unlawful, and moreover, the resulting rule violates the principles and goals of this proceeding.

II. The Commission Adopted Cox's Tier 1 Proposal That Permits Tariff Changes Imposing Both More And Less Restrictive Terms and Conditions To Be Filed On A Tier 1 Basis, And

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[2] OIR, p. 3.

[3] All references to Telecom Rules are to the rules included in D.07-09-019, Appendix A.

[4] All section references are to the California Public Utilities Code, unless otherwise stated.

Therefore, The Commission Should Eliminate Text Included In The URF Phase 2 Decision To The Contrary.

The Decisions erroneously subjects CLECs to an overly restrictive rule when making changes to their basic service offering. The rules in effect prior to the Commission adopting the Decisions allowed CLECs' advice letters imposing more restrictive terms applicable to their basic service offering take effect one day after filing, provided that 30 day notice was given to customers. The URF Phase 2 Decision erroneously changes that rule without any factual or legal support:

> As discussed in our accompanying GO 96-B decision, we are deferring to the pending R.06-06-028 rulemaking the issue of which tier to file any changes to URF ILEC basic service rates. To the extent that a carrier seeks to file any changes to terms and conditions for basic service, and such changes are not inconsistent with Commission decisions or orders, or state or federal law, and are not more restrictive, such changes may be filed in Tier 1. More restrictive terms and conditions for basic service shall be filed in Tier 3.[5]

Similarly, in the GO 96-B Decision, the Commission adopted Telecom Rule 7.1(5) which states:

> A change by an URF Carrier to a rate, charge, term, or condition of a regulated service (except for ILEC Basic Service rates). Changes to terms and conditions for Basic Service that are not more restrictive and that do not conflict with law or the Commission's decisions or orders are permitted.

These passages are erroneous because they require CLECs to file more restrictive tariff changes via Tier 3 advice letters.[6] They are directly contrary to the Commission concluding that both more and less restrictive terms and conditions may be filed via a Tier 1 advice letter. In comments filed on February 28, 2007 in this proceeding, Cox recommended that Tier 1 advice letters include the following:

> Text changes: ***more restrictive***, less restrictive or neutral changes ***to tariff terms & conditions*** (includes additional language, deleting language, correcting language, clarifying language, etc.). (Emphasis added).

The Commission expressly agreed and adopted Cox's Tier 1 Proposal for advice letter filings with a single, minor revision. The GO 96-B Decision concludes that Cox managed "to anticipate, almost exactly, the entire range of URF advice letters in Tier 1."[7] The Commission modified Cox's Tier 1 proposal only by adding contracts to Tier 1.[8] By adopting Cox's Tier 1 Proposal, the Commission concluded that "more restrictive" changes to *any* tariffed offering would be filed via Tier 1 advice letters and take effect upon filing provided that 30-day advance notice was provided to customers.

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[5] URF Phase 2 Decision, p. 76. This same language is echoed in the introductory paragraphs of the Decision at pp. 13-14.

[6] Rule 7.3(1) states that matters not subject to Tier 1 or Tier 2 review should be filed as Tier 3.

[7] GO 96-B Decision, p. 22.

[8] Id. p. 22, n. 15.

The Commission not only adopted Cox's Tier 1 Proposal but it expressly rejected DRA's and TURN's proposals which would have effectively required more restrictive terms to be filed as Tier 2 advice letters. For example, DRA sought to have any services changes, price increases or terms concerning public safety be subject to Tier 2.[9] And TURN advocated for Tier 1 filings to be limited to those changes that "do not impose price increases or have the effect of increasing a rate or charge, impose a more restrictive term or condition or material change in service, involve matters of public safety or withdraw or grandfather a service…."[10] TURN proposed a rule was the exact opposite of Cox proposed rules which the the Commission ultimately adopted. In rejecting TURN's proposal, the Commission concluded:

> Though differing in detail from DRA, TURN offers proposals with the same fundamental flaws. TURN seemingly prefers the advice letter review process created for rate-regulated utilities, where all advice letters were subject to suspension and all rate increases were subject to protest as unreasonable or discriminatory. TURN's proposed adaptations to the advice letter process in light of URF mostly preserve the outmoded process at the expense of URF policies. For these reasons, we reject TURN's proposals regarding URF advice letters.[11]

The Commission correctly rejected TURN's proposal as outdated and applicable to rate-regulated entities. It follows that the erroneous text cited above that is consistent with TURN's rejected proposal must be deleted from the Decisions.

The GO 96-B Decision explicitly considers Cox's Tier 1 Proposal, as well as the comments of other parties as to the content of Tier 1 advice letters and then adopts Cox's proposal. The GO 96-B Decision and Telecom Rule 7.1(5) include text that is not supported by any record evidence and is consistent with a position expressly rejected by the Commission. Accordingly, Cox requests that the Commission correct the GO 96-B Decision by deleting the unsubstantiated and unsupported text on pages 57-58 and Telecom Rule 7.1(5).

III. The Decisions Lacks The Factual And Legal Support Necessary To Impose More Restrictive Tier 3 Advice Letter Requirement.

The Commission issued proposed decisions corresponding to both the URF Phase 2 Decision and the GO 96-B Decision on July 23, 2007 ("Proposed Decisions"). The Proposed Decisions did not include proposed text or rules expressly requiring CLECs to file Tier 3 advice letters when implementing more restrictive terms for basic service. The draft version of Telecom Rule 7.1(5) included in the GO 96-B proposed decision was crafted in terms of "URF Carriers" and allowed them to use Tier 1 advice letter for

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[9] Id., p. 19.
[10] Id., p. 20 (citing Comments of The Utility Reform Network (March 2, 2007) at p. 19).
[11] Id., p. 22.

services other than Basic Service and Resale. In response to the Proposed Decisions, Cox, among other carriers, commented that the CLECs should not be included in the definition of "URF Carrier" and that the numerous references to "URF Carrier" in both decisions should be modified accordingly.[12] The Commission adopted Cox's proposal, in part, by adding a definition of "URF ILEC."[13] But adopting the term URF ILEC did not resolve the overbroad language included in the final version of Telecom Rule 7.1(5) or the text of the Decisions.

After receipt of comments on the Proposed Decisions, the Commission added, as discussed above, the following "Section 7.8, Filing of Basic Service Tariffs" in the URF Phase 2 Decision ("Section 7.8"):

> As discussed in our accompanying GO 96-B decision, we are deferring to the pending R.06-06-028 rulemaking the issue of which tier to file any changes to URF ILEC basic service rates. To the extent that a carrier seeks to file any changes to terms and conditions for basic service, and such changes are not inconsistent with Commission decisions or orders, or state or federal law, and are not more restrictive, such changes may be filed in Tier 1. More restrictive terms and conditions for basic service shall be filed in Tier 3.[14]

This paragraph is the entirety of Section 7.8. This section is included in the part of the URF Phase 2 Decision in which the Commission responds to interested parties' comments on the proposed decision but it fails to identify the party to which the Commission is responding. Moreover, Cox is not aware of any comments that advocate for the restrictive text included in section 7.8.[15] To be sure, this section is wholly conclusory without any reference to any party's comments or other substantive evidence in the record. There is no other text in the URF Phase 2 Decision that addresses or supports the Commission requiring CLECs to file Tier 3 advice letters when making changes to their basic service offering.

Section 7.8 references GO 96-B Decision as a possible source of support for the conclusory statements. But that decision is also void of substantive evidence, let alone any discussion, that could support subjecting CLECs to more restrictive tariff-filing rules. Similar to Section 7.8, the GO 96-B

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[12] Cox, Time Warner Telecom and XO Opening Comments on the URF Phase 2 Proposed Decision, dated August 13, 2007, pp. 3-4; Cox, Time Warner Telecom and XO Opening Comments on the GO 96-B Proposed Decision, dated August 13, 2007, pp. 1-2.

[13] GO 96-B Decision, pp. 40-41.

[14] URF Phase 2 Decision, p. 76. This same language is echoed in the introductory paragraphs of the Decision at pp. 13-14.

[15] AT&T filed comments on Telecom Rule 7.1(5) and expressly recommended that the text requiring advice letters on basic service be removed as it served no purpose. AT&T Opening Comments on GO 96-B Proposed Decision, dated August 13, 2007, pp. 6-7. And Verizon requested revisions to the draft Telecom Rule 7.1(5) that would clarify the process ILECs would follow when increasing their rates for basic service after expiration of the applicable rate cap. Verizon Opening Comments on GO 96-B Proposed Decision, dated August 13, 2007, pp. 5-6. By no means did these ILECs advocate that modified terms and conditions for basic service be subject to Tier 3 advice letter filings.

Decision includes a section addressing Telecom Rule 7.1(5) but it also is void of factual or legal support supporting a rule change.[16] Indeed, the applicable portion of the GO 96-B Decision begins by addressing rules applicable to AT&T and Verizon modifying basic service rates after January 1, 2009 and ends by adopting a broad rule concerning restrictive changes to basic service that is applicable to all carriers. Specifically, in response to AT&T and Verizon questioning how they, as ILECs subject to basic service price caps, may properly file changes to their rates for basic service,[17] the GO 96-B Decision appropriately defers the matter to the CHCF-B proceeding. But then, the passage goes on to "reiterate" that "URF Carriers" may impose more restrictive basic service terms and conditions via Tier 3 advice letters.[18]

This statement is erroneous for two critical reasons. First, the Commission is not "reiterating" any previously adopted rule or requirement. Nor is it "reiterating" a new rule properly addressed and adopted in either the URF Phase 2 Decision or the GO 96-B Decision. Rather, this single statement creates a new rule out of thin air which contradicts other findings in the URF Phase 2 Decision. Second, to the extent the Commission could theoretically justify applying this rule to the ILECs, as they are still subject to price caps and pricing rules under DIVCA, there is no theoretical or actual justification whatsoever for imposing this new rule on CLECs. Again, CLECs have always enjoyed full pricing flexibility (subject to providing Lifeline service and service to CHCF-B customers) and the ability to impose more restrictive terms on any service offering without obtaining a Commission resolution. There is nothing in the record of this proceeding that establishes the pre-existing rule should have been overturned. Without the requisite record support, the Decisions are erroneous and unlawful.

Cox recommends that the Commission eliminate the legal infirmities in the Decisions by deleting the second full paragraph in GO 96-B Decision, p. 58 and deleting the last sentence in Telecom Rule 7.1(5), as well as make corresponding changes to the URF Phase 2 Decision.[19]

IV. The Commission Did Not Properly Provide Notice Prior To Modifying An Existing Rule.

The thrust of the URF proceeding has been to eliminate many of the regulatory rules and mechanisms applicable to rate-regulated utilities, and relax others that reflect the more competitive environment the Commission found to exist for telecommunications in California. And the ILECs have been the primary beneficiaries of the URF's lighter regulatory approach, as CLECs have always been subject to less regulatory scrutiny. While the Commission seeks to adopt uniform rules for all carriers, at no time during the URF proceeding did the Commission or parties' comments, to the best of Cox's

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[16] GO 96-B Decision, pp. 57-58.

[17] CLECs did not need to request such flexibility as CLECs "already have pricing flexibility for all services, including basic residential lines. Decision 07-09-020, p. 83.

[18] GO 96-B Decision, p. 58.

[19] This includes deleting the text quoted above that is found at URF Phase 2 Decision, pp. 76, 13-14.

knowledge, contemplate imposing more restrictive rules on CLECs. Indeed, since instituting this proceeding, the Commission has consistently pursed the exact opposite approach. For example, where regulatory requirements applicable to CLECs were more stringent than newly adopted rules governing the ILECs, CLECs could comply with the least burdensome requirement.[20]

Similarly, in the URF Phase 1 Decision, the Commission changed the rules applicable to ILECs such that they could provide 30-day advance notice to customers for rate increases and more restrictive terms and conditions and such changes would be effective one day after filing.[21] The Commission made this rule applicable to CLECs as well. The URF Phase 1 Decision states:

> Since in a competitive market the strongest action a customer may take is to switch vendors, we believe it is reasonable to extend the thirty-day notice rule to all changes that either increase rates, withdraw services, *or impose more restrictive conditions*.[22]

Under the URF Phase 1 Decision then "All tariffs should go into effect on a one-day filing, but any tariffs that impose price increases or service restrictions should require a thirty-day advance noticed to all affected customers."[23] This rule is applicable to all services and does not subject restrictions to basic service to a more stringent advice letter filing process.[24]

The Decisions modify the rule adopted in the URF Phase 1 Decision with a more stringent rule that requires CLECs to file more restrictive terms and conditions for basic service via a Tier 3 advice letter. This means that CLECs must now wait and obtain a Commission resolution prior to implementing such changes. This is a significant – and wholly unsubstantiated – change in the regulation of CLECs. The Decisions make this change but without proper notice to interested parties. Modifying the existing rules created factual and legal questions for which interested parties should have had notice and an opportunity to comment. Failure to provide such notice and comment period is not consistent with the Commission's normal process and denies Cox its procedural due process rights.[25] It follows that the Commission should delete the erroneous text in the Decisions and modify Telecom Rule 7.1(5) to be consistent with existing rules.

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[20] URF Phase 1 Decision, p. 210.

[21] When authorizing CLECs to compete in the local exchange market, the Commission permitted CLECs to implement tariff changes effective on 40 days notice. See D.96-02.072, Appendix E, Rule 4(E)(4). Later, the Commission authorized CLECs to implement such changes on 30 days notice. D.05-01-032.

[22] URF Phase 1 Decision, p. 202. (Emphasis added).

[23] Id., p. 276, Conclusion of Law No. 35.

[24] Id, Finding of Fact No. 4 states: "In adopting the one-day filing procedure in D.06-08-030, we wanted to provide URF Carriers with the ability to innovate and offer new services or rates, terms, and conditions without regulatory delay."

[25] See Rule 14.1. While it could be argued that the revision to the proposed draft was not an "alternate" because it made changes in response to parties' comments, as demonstrated above, the new text added is not responsive to any given party's comments.

V. Conclusion.

Cox submits this Application for Rehearing to ensure that the Commission corrects erroneous and unlawful aspects of the URF Phase 2 Decision. Granting Cox's request is proper because the erroneous language was added after the proposed decision was issued for public comment, is not consistent with the record or the underlying policies adopted in the decision and improperly modifies a rule that the Commission adopted in the URF Phase 1 Decision. Accordingly, the Commission should grant this Application for Rehearing and delete the erroneous text discussed herein that is included on pages 13-14 and 76 of the URF Phase 2 Decision.

Dated: October 12, 2007

Respectfully submitted,
/s/

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PROOF OF SERVICE

I, Margaret L Tobias, the undersigned, hereby declare that, on October 12, 2007, caused a copy of the foregoing:

COX CALIFORNIA TELCOM, L.L.C., DBA COX COMMUNICATIONS, APPLICATION FOR REHEARING OF DECISION 07-09-019, OPINION ADOPTING TELECOMMUNICATIONS INDUSTRY RULES

in the above-captioned proceeding, to be served as follows:

[X] Via email and US Mail to the Assigned Commissioner

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[X] Via email to all parties, as set forth in the attached service list

Dated: October 12, 2007 at San Francisco, California.

/s/

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Margaret L. Tobias

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Proceeding: R0504005 - CPUC - PAC BELL, VER
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