

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

01-07-11
04:59 PM

Rulemaking on the Commission's Own
Motion to Review the Telecommunications
Public Policy Programs.

R.06-05-028

**RESPONSE OF AT&T TO THE APPLICATIONS FOR REHEARING OF D.10-11-033
FILED BY THE UTILITY REFORM NETWORK AND THE SMALL LECS**

ANNA KAPETANAKOS
DAVID P. DISCHER

AT&T Services, Inc.
525 Market Street, Suite 2024
San Francisco, CA 94105
Tel.: (415) 778-1480
Fax: (415) 543-0418
E-mail: anna.kapetanakos@att.com

Attorneys for AT&T California

January 7, 2011

TABLE OF CONTENTS

I. The Commission Did Not Err in Concluding Wireless Carriers Can Participate in California LifeLine 1

 A. TURN Has Not Shown an Error of Interpretation of D.00-10-028 and, in Any Event, the Conclusion That Wireless Carriers Can Participate in California LifeLine Is Supported by Substantial Evidence 1

 B. TURN’s Contention of Error in the Commission’s Alleged Failure to Address Problems with Wireless Participation Identified in D.00-10-028 Is Wrong 2

II. The Allegation of Error in Reliance on the 2010 Affordability Study Ignores the Substantial Evidence 2

III. The Attack on Geographic Deaveraged Rates Is an Improper Collateral Attack 3

IV. The Additional Language for Page 72 of D.10-11-033 Requested by the Small LECs Should Not Be Added..... 3

V. Conclusion 4

TABLE OF AUTHORITIES

Page No(s).

California Cases

Drummey v. State Bd. of Funeral Directors and Embalmers (1939), 13 Cal.2d 752
Iscoff v. Police Comm’n of City and County of San Francisco (1963), 222 Cal.App.2d 3952
People v. Western Air Lines (1954), 42 Cal.2d 6213

California Public Utilities Commission Decisions

City of Vallejo v. Pacific Gas and Electric Company, Decision No. 85-07-030, 18 Cal. P.U.C.2d 374 (1985)3
Re Pacific Gas & Elec. Co., Decision No. 92-02-078, Order Denying Rehearing of Resolution G-2967, 1992 WL 230570 (Cal. P.U.C. Feb 20, 1992).....3
Re Universal Service, Decision No. 96-10-066, Opinion, 68 Cal. P.U.C.2d 524 (Oct. 25, 1996)2
Re Universal LifeLine Telephone Service Program and General Order 153, Decision No. 00-10-028, Opinion, 2000 WL 1922282 (Cal.P.U.C. Oct. 5, 2000), as amended*passim*
Re Rulemaking to Assess and Revise the Regulation of Telecommunications Utilities, Decision No. 06-08-030, Opinion, 2006 PUC LEXIS 367 (Aug. 24, 2006)3
Re Rulemaking to Assess and Revise the Regulation of Telecommunications Utilities, Decision No. 07-10-015, Order Modifying Decision 07-05-050, and Denying Rehearing of Decision, as Modified, 2007 WL 2983814 (Cal.P.U.C. Oct. 4, 2007).....3

Other Authorities

CPUC Rules of Practice and Procedure, Rule 16.1(d).....1

AT&T¹ hereby responds to the December 22 and 23, 2010, Applications for Rehearing of D.10-11-033 by The Utility Reform Network (“TURN”) and the Small LECs² respectively, pursuant to Rule 16.1(d) of the Commission’s Rules of Practice and Procedure.

I. The Commission Did Not Err in Concluding Wireless Carriers Can Participate in California LifeLine.

TURN claims two errors were made when the Commission concluded that wireless carriers can participate in California LifeLine. The first contention is that the Commission misrepresents what it concluded in D.00-10-028 regarding wireless participation in California LifeLine. The second is that the Commission erred by not addressing, in detail, the problems of wireless participation identified in D.00-10-028. Neither contention of error disturbs the legitimacy of the Commission’s conclusion that wireless carriers can participate in California LifeLine.

A. TURN Has Not Shown an Error of Interpretation of D.00-10-028 and, in Any Event, the Conclusion That Wireless Carriers Can Participate in California LifeLine Is Supported by Substantial Evidence.

TURN cobbles pieces of sentences from D.00-10-028 to contend that the Commission previously concluded that wireless carriers should be precluded from participation in California LifeLine. TURN contends that because D.10-11-033 asserts that in D.00-10-028 the Commission concluded wireless carriers could participate in California LifeLine, and that it was not changing that determination in D.10-11-033, D.10-11-033 is erroneous. But D.10-11-033 cites the specific language from D.00-10-028 to support the conclusion that wireless participation is a continuation of the policy enunciated in D.00-10-028:

The outline of our proposal is simple: CMRS carriers should be allowed to provide ULTS if they comply with all ULTS program rules.³

¹ Pacific Bell Telephone Company d/b/a AT&T California (U 1001 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); AT&T Advanced Solutions, Inc. (U 6346 C); and New Cingular Wireless PCS, LLC (U 3060 C).

² The Small LECs, as they call themselves, are Calaveras Telephone Company (U 1004 C); Cal-Ore Telephone Co. (U 1006 C); Ducor Telephone Company (U 1007 C); Foresthill Telephone Co. (U 1009 C); Happy Valley Telephone Company (U 1010 C); Hornitos Telephone Company (U 1011 C); Kerman Telephone Company (U 1012 C); Pinnacles Telephone Co. (U 1013 C); The Ponderosa Telephone Co. (U 1014 C); Sierra Telephone Company, Inc. (U 1016 C); The Siskiyou Telephone Company (U 1017 C); Volcano Telephone Company (U 1019 C); Winterhaven Telephone Company (U 1021 C).

³ D.10-11-033, *mimeo*, p. 68 (quoting D.00-10-028, 8 CPUC 3d at 641).

The Commission, in D.10-11-033, is not misinterpreting D.00-10-028.

Moreover, in D.10-11-033, the Commission discusses the facts supporting its conclusion that wireless should be allowed to participate in California LifeLine.⁴ Since the determination that wireless should be able to participate is supported by substantial evidence, it is legally sound.⁵

B. TURN's Contention of Error in the Commission's Alleged Failure to Address Problems with Wireless Participation Identified in D.00-10-028 Is Wrong.

TURN contends that D.00-10-028 identified a number of problems with wireless carrier participation in California LifeLine, and the Commission erred in failing to detail how these problems have been resolved. However, the Commission did not even need to address these issues because the Commission required that "should they choose to participate, they must abide by rules of the program"⁶ Since wireless carriers are required to meet the rules of the program, including, for example, the requirement to provide basic service with "free emergency services, access to 911/E911,"⁷ the conclusion that wireless carriers can participate needs no further discussion of any needed exceptions. Moreover, a detailed explanation is unnecessary given the conclusion reached in D.00-10-028 that "CMRS [wireless] carriers should be allowed to provide ULTS if they comply with all ULTS program rules."⁸ TURN fails to show any error.

II. The Allegation of Error in Reliance on the 2010 Affordability Study Ignores the Substantial Evidence.

TURN alleges error in the Commission's reliance on the 2010 Affordability Study and that this error requires revisiting the conclusion to adopt an SSA rather than a set California LifeLine rate. What TURN fails to acknowledge is that the Commission did not even rely on the 2010 Affordability Study in analyzing whether to adopt the SSA rather than a set LifeLine rate. At pages 39 through 64

⁴ D.10-11-033, *mimeo*, pp. 66-73.

⁵ *See, e.g., Drummey v. State Bd. of Funeral Directors and Embalmers* (1939), 13 Cal.2d 75, 86; *Iscoff v. Police Comm'n of City and County of San Francisco* (1963), 222 Cal.App.2d 395, 410.

⁶ D.10-11-033, *mimeo*, p. 135 (Conclusion of Law 29); *see also id.* at 68 ("Therefore, all carriers that are able to comply with the requirements of GO 153 may participate in the California LifeLine Program, including wireless and VoIP carriers.").

⁷ *Re Universal Service*, Decision No. 96-10-066, *Opinion*, 68 Cal. P.U.C.2d 524 (Oct. 25, 1996), *mimeo*, Appendix A, p. 5.

⁸ *Re Universal LifeLine Telephone Service Program and General Order 153*, Decision No. 00-10-028, *Opinion*, 2000 WL 1922282, 8 Cal. P.U.C.3d at 641 (Oct. 5, 2000).

of D.10-11-033, the Commission details numerous facts supporting the SSA methodology as the correct policy outcome. Nowhere in this analysis is the 2010 Affordability Study even mentioned. Because the conclusion to adopt the SSA over the set rate is supported by substantial evidence (even when not including the 2010 Affordability Study), it is not erroneous.⁹

III. The Attack on Geographic Deaveraged Rates Is an Improper Collateral Attack.

TURN contends the Commission erred in failing to consider the effect of deaveraging rates on affordability. The Commission already addressed this issue in D.06-08-030. There, the Commission concluded, “price regulation is no longer needed to ensure that prices are just and reasonable,”¹⁰ and also permitted carriers to geographically deaverage rates.¹¹ TURN’s contention that these determinations need to be revisited has no basis, and constitutes an improper collateral attack on D.06-08-030.¹²

IV. The Additional Language for Page 72 of D.10-11-033 Requested by the Small LECs Should Not Be Added.

The Small LECs allege error in the Commission’s finding that “rate-of-return carriers’ overall financial results will not differ if wireless carriers receive LifeLine support for customers living in the rate-of-return carriers’ service territory.”¹³ The Small LECs say this can be corrected by either removing this sentence, or by augmenting the sentence on page 72 of D.10-11-033 as follows:

Further, the rate-of-return carriers’ overall financial results will not differ if wireless carriers receive LifeLine support for customers living in the rate-of-return carriers’

⁹ See fn. 4, *supra*.

¹⁰ *Re Rulemaking to Assess and Revise the Regulation of Telecommunications Utilities*, Decision No. 06-08-030, *Opinion*, 2006 PUC LEXIS 367 (Aug. 24, 2006), *mimeo*, p. 132.

¹¹ *Id.* at 142-143, 280 (Ordering Paragraph 1).

¹² See, e.g., *Re Pacific Gas & Elec. Co.*, Decision No. 92-02-078, *Order Denying Rehearing of Resolution G-2967*, 1992 WL 230570 (Cal. P.U.C. Feb 20, 1992) (“PG&E’s application for rehearing of Resolution G-2967 is yet another attempt to relitigate D.91-02-040 during the compliance phase. It is also an attempt to reargue the issue of taking, which the Commission rejected in D.91-05-058. Public Utilities Code section 1709 provides that ‘the orders and decision of the Commission which have become final shall be conclusive.’ Thus this statutory provision bars PG&E from making such a collateral attack of D.91-02-040. (*See People v. Western Air Lines* (1954), 42 Cal.2d 621, 630; *City of Vallejo v. Pacific Gas and Electric Company*, Decision No. 85-07-030, 18 Cal. P.U.C.2d 374, *mimeo*, p. 7 (1985)). Thus, the instant rehearing application is without merit and is also denied on collateral estoppel grounds.”); see also *Re Rulemaking to Assess and Revise the Regulation of Telecommunications Utilities*, Decision No. 07-10-015, *Order Modifying Decision 07-05-050, and Denying Rehearing of Decision, as Modified*, 2007 WL 2983814 (Cal.P.U.C. Oct. 4, 2007), *mimeo*, p. 7.

¹³ Small LECs’ Application for Rehearing, p. 1 (quoting D.10-11-033 at 72).

service territory because rate-of-return carriers will be permitted to recover regulated revenue losses caused by reductions in LifeLine customers from the CHCF-A. Rate-of-return carriers can claim historical revenue impacts from LifeLine customer losses through the CHCF-A annual adjustment process as the results of a “regulatory change of industry-wide effect.” The prospective revenue impact of such losses will be address[ed] in rate-of-return carriers’ rate cases.¹⁴

AT&T does not agree that the addition of this language is appropriate. Automatic recovery from CHCF-A for financial effects from LifeLine customer losses is not the appropriate remedy, and the Small LECs fail to show that this outcome was raised in the proceeding. Consequently, this additional, substantive change is not appropriate.

V. Conclusion

For the reasons described above, TURN’s request for rehearing of D.10-11-030 and the Small LECs requested additional language to page 72 should both be denied.

Dated this 7th day of January 2011 at San Francisco, California.

Respectfully submitted,

/s/

ANNA KAPETANAKOS
DAVID P. DISCHER

AT&T Services, Inc.
525 Market Street, Suite 2024
San Francisco, CA 94105
Tel.: (415) 778-1480
Fax: (415) 543-0418
E-mail: anna.kapetanakos@att.com

Attorneys for AT&T California

¹⁴ See *id.* at 9-12.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **RESPONSE OF AT&T TO THE APPLICATIONS FOR REHEARING OF D.10-11-033 FILED BY THE UTILITY REFORM NETWORK AND THE SMALL LECS** on all persons on the official Service List in **R.06-05-028**, via e-mail, hand delivery, and/or first-class U.S. Mail.

Dated this 7th day of January 2011 at San Francisco, California.

AT&T CALIFORNIA
525 Market Street, 20th Floor
San Francisco, CA 94105

/s/

Hugh Osborne

PROCEEDING: R0605028
LAST CHANGED: JANUARY 5, 2011

STEPHANIE C. CHEN
THE GREENLINING INSTITUTE
EMAIL ONLY
EMAIL ONLY, CA 00000
FOR: THE GREENLINING INSTITUTE

WILLIAM D. WALLACE ESQ.
VERIZON WIRELESS
1300 I STREET, N.W., SUITE 400 WEST
WASHINGTON, DC 20005

RICHARD CHABRAN
CALIFORNIA COMMUNITY TECHNOLOGY POLICY
1000 N ALAMEDA STREET, SUITE 240
LOS ANGELES, CA 90012

JESUS G. ROMAN
MCIMETRO ACCESS TRANSMISSION SERVICES
2535 W. HILLCREST DR., MC CAM21LB
NEWBURY PARK, CA 91320
FOR: VERIZON

ESTHER NORTHRUP
COX COMMUNICATIONS
350 10TH AVENUE, SUITE 600
SAN DIEGO, CA 92101

HIEN VO
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 5135
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

LEWIS GOLINKER
ASSISTIVE TECHNOLOGY LAW CENTER
401 EAST STATE STREET, SUITE 300
ITHACA, NY 14850

OLIVIA B. WEIN
ATTORNEY AT LAW
NATIONAL CONSUMER LAW CENTER
1001 CONNECTICUT AVE. NW STE. 510
WASHINGTON, DC 20036
FOR: NATIONAL CONSUMER LAW CENTER

JAMES DOLGONAS
PRESIDENT/CEO
CORPORATION FOR EDUCATION NETWORK
16700 VALLEY VIEW AVE., STE. 400
CYPRESS, CA 90630-5042
FOR: CORP FOR EDUCATION NETWORK
INITIATIVES IN CALIFORNIA (CENIC)

PHIL KAPLAN
DDTPAC
19262 PEBBLE BEACH PLACE
NORTHRIDGE, CA 91326-1444
FOR: DDTPAC (TELECOMM ACCESS
FOR THE DEAF & DISABLED ADMIN
COMMITTEE)

MIKE BAGLEY
VERIZON WIRELESS
BUILDING E. THIRD FLOOR
15505 SAND CANYON AVENUE
IRVINE, CA 92618

CHRISTINE MAILLOUX
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: TURN

REGINA COSTA
THE UTILITY REFORM NETWORK
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104

WILLIAM NUSBAUM
THE UTILITY REFORM NETWORK
SUITE 350
115 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94104
FOR: TURN

ANNA KAPETANAKOS
SENIOR ATTORNEY AT LAW
AT&T SERVICES INC.
525 MARKET STREET, ROOM 2024
SAN FRANCISCO, CA 94105
FOR: AT&T CALIFORNIA

KRISTIN L. JACOBSON, ESQ.
SPRINT NEXTEL
201 MISSION STREET, SUITE 1500
SAN FRANCISCO, CA 94105

PETER HAYES
PACIFIC BELL TELEPHONE COMPANY
525 MARKET STREET, ROOM 1919
SAN FRANCISCO, CA 94105

STEPHANIE E. HOLLAND
AT&T CALIFORNIA
525 MARKET STREET, SUITE 2026
SAN FRANCISCO, CA 94105
FOR: AT&T

THOMAS J. SELHORST
SENIOR PARALEGAL
AT&T CALIFORNIA
525 MARKET STREET, RM. 2023
SAN FRANCISCO, CA 94105

STEPHEN H. KUKTA
SPRINT NEXTEL
201 MISSION STREET, STE. 1500
SAN FRANCISCO, CA 94105-1831

PETER A. CASCIATO
A PROFESSIONAL CORPORATION
355 BRYANT STREET, SUITE 410
SAN FRANCISCO, CA 94107
FOR: COMCAST PHONE OF CALIFORNIA, LLC

JEANNE B. ARMSTRONG
GOODIN MACBRIDE SQUERI RITCHIE DAY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111
FOR: CALAVERAS/SUREWEST TELEPHONE

PATRICK M. ROSVALL
ATTORNEY
COOPER, WHITE & COOPER LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111
FOR: THE SMALL LECS/SUREWEST
TELEPHONE/SUREWEST TELEVIDEO

SARAH E. LEEPER
MANATT, PHELPS & PHILLIPS, LLP
ONE EMBARCADERO CENTER 30TH FLOOR
SAN FRANCISCO, CA 94111

MARTIN A. MATTES
ATTORNEY AT LAW
NOSSAMAN GUTHNER KNOX ELLIOTT, LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO, CA 94111-4799
FOR: CALIFORNIA PAYPHONE ASSC

SUZANNE TOLLER
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: CRICKET COMMUNICATIONS, INC.
ANGELES

ROBERT GNAIZDA
200 29TH STREET, NO. 1
SAN FRANCISCO, CA 94131
FOR: NATL ASIAN AMERICAN COALITION
/ BLACK ECONOMIC COUNCIL / LATINO
BUSINESS CHAMBER OF GREATER LOS

EARL NICHOLAS SELBY
ATTORNEY AT LAW
LAW OFFICES OF EARL NICHOLAS SELBY
530 LYTTON AVENUE, 2ND FLOOR
PALO ALTO, CA 94301-1705
FOR: SPRINT NEXTEL

ANNA LEACH-PROFFER
STAFF ATTORNEY
CA CENTER FOR LAW AND THE DEAF
14895 E. 14TH ST., SUITE 220
SAN LEANDRO, CA 94578
FOR: CCASDHH

DOUGLAS GARRETT
COX COMMUNICATIONS
2200 POWELL STREET, STE. 1035
EMERYVILLE, CA 94608

ANN RUTH
EQUIPMENT PROGRAM ADVISORY CMMTE
505 14TH STREET, SUITE 400
OAKLAND, CA 94612
FOR: THE EQUIPMENT PROGRAM ADVISORY
COMMITTEE

LEON M. BLOOMFIELD
WILSON & BLOOMFIELD, LLP
1901 HARRISON STREET, SUITE 1620
OAKLAND, CA 94612
FOR: T-MOBILE WEST CORPORATION D/B/A
T-MOBILE/OMNIPOINT COMMUNICATIONS, INC.

SHELLEY BERGUM
CALIFORNIA COMMS. ACCESS FOUNDATION
1300 CLAY STREET, SUITE 600
OAKLAND, CA 94612

THOMAS FOLEY
EXECUTIVE DIRECTOR
WORLD INSTITUTE ON DISABILITY
510-16HT STREET, SUITE 100
OAKLAND, CA 94612

FERNANDA MARTINEZ DE OLIVEIRA
LATINO ISSUES FORUM
1918 UNIVERSITY AVE., SUITE 3D
BERKELEY, CA 94704-1051
FOR: LATINO ISSUES FORUM

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, FOURTH FLOOR
BERKELEY, CA 94704-1204
FOR: DISABILITY RIGHTS

CHARLES E. BORN
MANAGER - GOVERNMENT & EXTL AFFAIRS
FRONTIER TELECOMMUNICATIONS CALIF.
9260 E. STOCKTON BLVD.
ELK GROVE, CA 95624
FOR: FRONTIER TELECOMMUNICATIONS OF
CALIFORNIA

RUSSELL A. SELKEN
BUTTE COUNTY OFFICE OF EDUCATION
1859 BIRD STREET
OROVILLE, CA 95965
FOR: BUTTE COUNTY OFFICE OF EDUCATION

BETH FUJIMOTO
DIRECTOR-EXTERNAL AFFAIRS
CINGULAR WIRELESS
PO BOX 97061
REDMOND, WA 98073-9761

CINDY MANHEIM
CINGULAR WIRELESS
PO BOX 97061
REDMOND, WA 98073-9761

PHYLLIS WHITTEN
FRONTIER COMMUNICATIONS
EMAIL ONLY
EMAIL ONLY, CA 00000

CHRISTY DOLESHAL
SOLIX, INC.
100 S. JEFFERSON ROAD
WHIPPANY, NJ 07981

KAREN HAITH
SOLIX, INC.
100 S. JEFFERSON ROAD
WHIPPANY, NJ 07981

FAYE KUO
154 IH S 35, STE 225
AUSTIN, TX 78704

JORGE CORRALEJO
CHAIRMAN / PRESIDENT
LAT. BUS. CHAMBER OF GREATER L.A.
634 S. SPRING STREET, STE 600
LOS ANGELES, CA 90014

JACQUE LOPEZ
VERIZON CALIFORNIA INC.
2535 W. HILLCREST DR., MC CAM21LB
NEWBURY PARK, CA 91320

PHILLIP L. CLEVERLY
VERIZON CALIFORNIA INC.
112 S LAKEVIEW CANYON RD, CA501LS
THOUSAND OAKS, CA 91362

MARCIE EVANS
COX COMMUNICATIONS
350 10TH AVENUE, SUITE 600
SAN DIEGO, CA 92101

CHARLES HARAK
NATIONAL CONSUMER LAW CENTER
7 WINTHROP SQUARE, 4TH FLOOR
BOSTON, MA 02110

JACK DONOVAN
SOLIX, INC.
100 S. JEFFERSON ROAD
WHIPPANY, NJ 07981

ROSS ALLEN BUNTROCK
ARENT FOX LLP
1050 CONNECTICUT AVE NW, 7TH FLOOR
WASHINGTON, DC 20036

MARK SEEGER
1524 IH S 35, STE 225
AUSTIN, TX 78704

MICHAEL ARRIGO
7516 FOUNTAIN AVENUE
W. HOLLYWOOD, CA 90046

DONALD C. EACHUS
VERIZON CALIFORNIA, INC.
112 LAKEVIEW CANYON ROAD, CA501LS
THOUSAND OAKS, CA 91362

LORRAINE A. KOCEN
VERIZON CALIFORNIA INC.
112 S. LAKEVIEW CANYON ROAD, CA501LS
THOUSAND OAKS, CA 91362-3811

LAURIE ITKIN
CRICKET COMMUNICATIONS, INC.
5887 COPLEY DRIVE
SAN DIEGO, CA 92111

FAITH BAUTISTA
PRESIDENT
NATIONAL ASIAN AMERICAN COALITION
9580 BLACK MOUNTAIN ROAD, STE. A
SAN DIEGO, CA 92126

GILBERT DELTORO
GREATCALL, INC. - JITTERBUG
12680 HIGH BLUFF DRIVE, STE 310
SAN DIEGO, CA 92130

LINDA BURTON
SIERRA TELEPHONE COMPANY, INC.
PO BOX 219
OAKHURST, CA 93644-0219

DAVID DISCHER
ATTORNEY AT LAW
PACIFIC BELL TELEPHONE COMPANY
525 MARKET STREET, RM. 2027
SAN FRANCISCO, CA 94105

JEFFREY MONDON
DIR - REGULATORY
AT&T CALIFORNIA
525 MARKET STREET, ROOM 1924
SAN FRANCISCO, CA 94105

MICHAEL FOREMAN
ASSOCIATE DIRECTOR-STATE REGULATORY
AT&T CALIFORNIA
525 MARKET STREET, 19TH FLOOR 30
SAN FRANCISCO, CA 94105

MARGARET TOBIAS
ATTORNEY AT LAW
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVE
SAN FRANCISCO, CA 94107

JUSTINE WELDON
760 NORTH POINT STREET SUITE 101
SAN FRANCISCO, CA 94109

JOHN L. DARBY
ADMINISTRATIVE COMMITTEE, DDTP
1661 PINE STREET, APT.443
SAN FRANCISCO, CA 94109-0416

E. GARTH BLACK
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, 8TH FLOOR
SAN FRANCISCO, CA 94111

GLENN STOVER
STOVER LAW
584 CASTRO ST., NO 199
SAN FRANCISCO, CA 94114-2594

MARILYN FINN
HEARING LOSS ASSOCIATION OF CA
101 LAFAYETTE CIRCLE, APT. 1
LAFAYETTE, CA 94549

JOHN A. GUTIERREZ
COMCAST CABLE COMMUNICATIONS, INC.
3055 COMCAST PLACE
LIVERMORE, CA 94551

ANITA TAFF-RICE
COUNSEL
CALTEL
1547 PALOS VERDES, 298
WALNUT CREEK, CA 94597

LEN CANTY
BLACK ECONOMIC COUNCIL
484 LAKEPARK AVE. SUITE 338
OAKLAND, CA 94610

WORLD INSTITUTE ON DISABILITY
510-16TH STREET, STE. 100
OAKLAND, CA 94612-1500

WINSTON CHING
DDTPAC
2133 GRANT STREET, 1
BERKELEY, CA 94703

SAMUEL KANG
MANAGING ATTORNEY
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704

ENRIQUE GALLARDO
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704-1051

FERNANDA M. DE OLIVEIRA
TECHNOLOGY & TELECOMMUNICATIONS PROGRAM
LATINO ISSUES FORUM
1918 UNIVERSITY AVE., SUITE 3D
BERKELEY, CA 94704-1051

JOE CHICOINE
MANAGER, STATE GOVERNMENT AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

JACQUELINE R. KINNEY
PRINCIPAL CONSULTANT
SENATE COMMITTEE ENERGY, UTILITIES & COM
STATE CAPITOL, ROOM 2195
SACRAMENTO, CA 95814

GLENN SEMOW
CALIFORNIA CABLE & TELECOMM. ASSOC.
1001 K ST., FL. 2
SACRAMENTO, CA 95814-3832

BILL STOBBE
MISSION CONSULTING
555 CAPITOL MALL, STE. 600
SACRAMENTO, CA 95814-4581

REGINA TOCHTERMAN
1506 WENTWORTH AVENUE
SACRAMENTO, CA 95822

TED HOWARD
CALIFORNIA PUBLIC UTILITIES COMMISSION
EMAIL ONLY
EMAIL ONLY, CA 00000

PETER Y. CHANG
CALIF PUBLIC UTILITIES COMMISSION
POLICY ANALYSIS BRANCH
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

ADAM CLARK
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROGRAMS BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ALIK LEE
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BENJAMIN SCHEIN
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROGRAMS BRANCH
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BEZAWIT DILGASSA
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
AREA 2-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHERRIE CONNER
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROGRAMS BRANCH
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

FALINE FUA
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROGRAMS BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

FE N. LAZARO
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROGRAMS BRANCH
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JANEEN L. LONG
CALIF PUBLIC UTILITIES COMMISSION
UTILITY & PAYPHONE ENFORCEMENT
ROOM 2-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KELLY HYMES
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5306
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

LAURA E. GASSER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DRA

MARIBETH A. BUSHEY
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5018
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

MICHELE M. KING
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATALIE BILLINGSLEY
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATHAN CHRISTO
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROGRAMS BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5212
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RICHARD MANISCALCO
CALIF PUBLIC UTILITIES COMMISSION
CONSUMER PROGRAMS BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT HAGA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5221
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROXANNE SCOTT
CALIF PUBLIC UTILITIES COMMISSION
POLICY ANALYSIS BRANCH
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

WILLIAM JOHNSTON
CALIF PUBLIC UTILITIES COMMISSION
POLICY ANALYSIS BRANCH
AREA 3-F
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

XIAO SELENA HUANG
CALIF PUBLIC UTILITIES COMMISSION
COMMUNICATIONS POLICY BRANCH
ROOM 4211
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214