

BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA



FILED
08-16-10
04:59 PM

Order Instituting Rulemaking on the
Commission's Own Motion to establish
Consumer Rights and Protection Rules
Applicable to All Telecommunications
Utilities.

Rulemaking 00-02-004
(Filed February 3, 2000)

**REPLY COMMENTS OF THE DIVISION OF RATEPAYER
ADVOCATES IN OPPOSITION TO THE SUPPLEMENTAL COMMENTS OF
CTIA-THE WIRELESS ASSOCIATION**

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August 16, 2010

I. INTRODUCTION

On August 6, 2010 CTIA-The Wireless Association (“CTIA”) filed supplemental comments, which included an alternative proposal to Assigned Commissioner Bohn’s *California Telephone Corporation Billing Rules* proposed in his February 12, 2010 Assigned Commissioner Ruling (“2010 ACR”). The Assigned Administrative Law Judge gave the Division of Ratepayer Advocates (“DRA”) and other parties the opportunity to file comments on CTIA’s proposal, due on August 16, 2010. DRA submits these reply comments to highlight the significant flaws in CTIA’s alternative proposal. DRA also objects to CTIA’s filing of another alternative proposal as procedurally improper.

Unlike the comprehensive set of rules proposed by Commissioner Bohn, CTIA’s proposal misses key aspects of those rules. For example, the CTIA proposal does not impose ultimate responsibility for charges on Billing Telephone Corporations (“BTCs”), does not impose reporting by BTCs of their own instances of cramming, and does not require BTCs to suspend third party service providers that have high complaint or refund rates. Under CTIA’s proposal, wireless carriers would have no genuine obligations to protect consumers. Rather, their responsibilities would be limited to providing the Commission with superficial “reports” containing subjective data of little use to the Commission in its enforcement efforts. DRA, therefore, requests that the Commission reject CTIA’s proposal and issue a proposed decision that adopts Commissioner Bohn’s proposed rules.

II. CTIA’S PROPOSAL

CTIA provided its proposal as an alternative to rules developed by Commissioner Bohn and his Staff. CTIA’s alternative contains the following provisions in apposition to Commissioner Bohn’s proposed rules; however, CTIA’s counterproposal is strikingly different.

A. Termination reporting

CTIA's proposed "Termination Reports" would report *only* on the Premium Short Messaging Service (PSMS) campaigns¹ and or/short codes of third party service providers that were terminated by the wireless carrier. Examples of PSMS campaigns and/or short codes include text-based content (e.g., alerts, jokes, trivia, weather, etc.), downloadable content (e.g., ringtones, wallpaper, etc.) and charitable donations (e.g., Haitian earthquake relief, etc.).²

This proposal would necessarily depend upon the discretion and subjectivity of each wireless carrier. Each carrier may terminate advertising campaigns based on different threshold levels and for different reasons. For example, one carrier may terminate a campaign that generates a refund ratio that is 15% or greater, while others may have higher or lower triggers. Moreover, a termination report of ad campaigns would have little impact on deterring cramming because it does not directly target the unscrupulous third party service providers, nor does it create any safeguards to prevent them from returning under a different campaign. Further, limiting the termination report to "actual or suspected" cramming means that carriers must have some method of differentiating cramming from other innocuous events, like general billing questions. If that is indeed possible, that would contradict CTIA's long-standing position that it would be difficult for them to track cramming complaints.

B. Suspension Reporting

Each wireless carrier would submit a quarterly report to the Director of CPSD that only identifies any PSMS campaign and/or short code that was suspended by the wireless carrier during the preceding calendar quarter as a result of actual or suspected cramming.³ "Suspension occurs when a carrier prevents a PSMS campaign or short code from

¹ By "campaign", CTIA means an advertising campaign.

² The proposed rules in the ACR go beyond reporting about terminations of advertising "campaigns" and/or "short codes;" they appropriately target information regarding service providers and their principals.

³ CTIA Supplemental Comments (August 6, 2010) at 7.

obtaining new customers.”⁴ Suspension Reporting suffers from the same deficiencies as Termination Reporting and is therefore of little value as proposed.

C. Refund Reporting

This “reporting” rule is a red herring; not all refunds would be reported under CTIA’s proposal. Again, this report is problematic because it relies upon the discretion and subjectivity of each wireless carrier, because refunds would only be reported under limited circumstances. Each wireless carrier would submit a report to the Director of CPSD that only identifies any PSMS campaign and/or short code available to California customers whose refund rate for any two consecutive months within the quarter or ending in the quarter is 15% or greater.⁵ However, even if the refund rate for a campaign and/or short code reaches 15%, this reporting requirement would not be triggered unless the refunds for that campaign or short code also exceeded \$5,000.⁶ These limitations render this report useless. As noted above, third party service providers may have multiple campaigns and/or short codes active at one time. Thus, under this rule an unscrupulous service provider could maintain and continue to profit from multiple cramming campaigns and/or short codes so long as the refunds are \$5000 or less for two months. Rather than deter cramming, this rule creates an obvious loophole for “bad actors.” Moreover, CTIA fails to explain the basis for the 15% reporting threshold or the criteria for two consecutive months – 15% seems unacceptably high.

D. Call Blocking Reporting

Under this proposal, carriers would not be required to affirmatively offer call blocking to customers. Rather, they would merely inform the Commission once a year of their call blocking practices, if any.⁷ This rule benefits neither the Commission nor consumers in terms of cramming prevention or detection. Commission staff and DRA

⁴ *Id.*

⁵ *Id.*

⁶ *Ibid.* at 8.

⁷ *Id.*

could routinely get this information from carriers absent this proposal because staff is empowered to receive it under Pub. Util. Code Sections 314 and 309.5, respectively, among others. As a strong measure to protect their customers and to absolutely prevent cramming from occurring or re-occurring, the Commission should require carriers to inform and provide their customers with the option to block third party charges or supplemental services offered directly by the carriers (*e.g.*, data services) at the time of sale and thereafter when a customer contacts the carrier to complain about unauthorized charges.

E. Consumer Education and Collaboration with Staff

The wireless industry recommends continued consumer education and collaboration with staff by proposing an annual meeting with CPUC staff to provide an update on technological and market changes in the wireless industry. While DRA welcomes collaboration, the information obtained from this type of meeting would provide little, if any, data regarding “bad actors.” Receiving data annually would result in stale data that may be useless to the Commission to catch fly-by-night service providers.

F. Exception for Prepaid Wireless Service

CTIA proposes to exempt pre-paid wireless carriers from any reporting rules. However, CTIA fails to provide any substantive evidence to support this rule, other than to re-allege from its past comments that the pre-paid wireless business model does not allow for cramming.⁸ DRA disputed this allegation in previous comments by showing that customers of Cricket, a pre-paid wireless provider, had complained to the Commission about cramming charges.⁹ For example, customers made the following complaints regarding prepaid wireless service, which demonstrates that cramming is possible:

⁸ CTIA Supplemental Comments (August 6, 2010) at 9.

⁹ DRA Reply Comments on 2010 ACR (April 9, 2010) at 14.

- “Customer states that services were charged to his account without his authorization.”¹⁰
- “Cricket added a feature to my plan without notifying me.”¹¹
- “Consumer being billed for feature never ordered, ringback tone called eo, ...”¹²
- “Billed for 2 ringtones never ordered.”¹³
- “Complaint/Concern: adding things to my phone bill like ring tone, extra charges.”¹⁴

So long as pre-paid wireless carriers act as billing telephone companies, they are (and should be) subject to Sections 2889.9 and 2890 (“anti-cramming statutes”) and the reporting mandates contained therein.

III. DISCUSSION

A. CTIA’S PROPOSAL IS FATALLY FLAWED AND SHOULD BE REJECTED.

1. The Reports Proposed By CTIA Would Not Comply With Section 2889.9(d).

Under CTIA’s proposal, cramming complaints would not be reported by the wireless industry. Contrary to CTIA’s claim that under Section 2889.9(i) its proposed reporting rules would comply with Section 2889.9(d), the plain language of section 2889.9(d) does not provide for any exceptions or qualifications for the Commission to require anything less than reports of complaints.¹⁵ To allow wireless carriers to evade this obligation would be inconsistent with the explicit mandate in Section 2889.9(d) to

¹⁰ DRA Reply Comments on 2010 ACR (April 9, 2010) at 14, *citing* CAB Complaint # 51881 (July 9, 2009).

¹¹ *Ibid.*, *citing* CAB Complaint # 22089 (Feb. 6, 2009).

¹² *Ibid.*, *citing* CAB Complaint # 17637 (Jan. 20, 2009).

¹³ *Ibid.*, *citing* CAB Complaint # 21183 (Feb.4, 2009).

¹⁴*Ibid.*, *citing* CAB Complaint # 64146 (Sept. 21, 2009).

¹⁵ DRA briefed this issue in previous comments, and will therefore not repeat it here. *See* DRA Comments on 2010 ACR (March 22, 2010) at 1-2.

require “each billing telephone company...to provide the commission with reports of *complaints* made by subscribers...”¹⁶ Section 2889.9(i), cited by CTIA, allows the Commission to adopt further rules to enforce the anti-cramming statutes, but does not create the authority to disregard the unambiguous reporting requirement of Section 2889.9(d).¹⁷

2. CTIA’s Proposal Consists Of Useless Reports.

CTIA asserts that its reports would give the Commission much of the same information that the complaint reports proposed by Commissioner Bohn would generate.¹⁸ However, none of CTIA’s reports, either alone or together, would give the Commission the necessary information about third party service providers that the Commission needs to go after “bad actors.”

The Commission currently receives from wireline carriers and billing aggregators on a quarterly basis, the same subscriber complaint report as the one proposed in Commissioner Bohn’s rules. Among other things, the cramming complaint report identifies the following information for each third party service provider: the number of cramming complaints received, the total amount billed, and the total amount refunded. Each data point is broken down by month and is California specific. The Commission has relied on the cramming complaint reports in its decisions to initiate investigations, or to ultimately impose fines and sanctions on crammers, and thus the complaint reports are reliable and useful.¹⁹ DRA supports continuing the existing complaint reporting obligations, along with the expanded requirements contemplated in Commissioner Bohn’s 2010 ACR.

¹⁶ Pub. Util. Code § 2889.9(d). (Emphasis added.)

¹⁷ Pub. Util. Code § 2889.9(i) states, “The commission may adopt rules, regulations and issue decisions and orders, as necessary, to safeguard the rights of consumers and to enforce the provisions of this article.”

¹⁸ CTIA Supplemental Comments (August 6, 2010) at 4.

¹⁹ See DRA Reply Comments on February 22, 2008 ACR (April 28, 2008) at 16-18.

a) General Concerns with CTIA's proposed reports

As described above, CTIA's proposal limits reporting to PSMS campaigns and/or short codes. To limit reporting to PSMS campaigns and/or short codes is deceptive because other types of crams, like unauthorized directory assistance calls or those perpetrated by the wireless carrier, would be permitted to go undetected. For anti-cramming purposes, the campaign and/or short code information is useless unless the Commission can easily identify the unscrupulous service providers responsible for each terminated or suspended campaign and/or short code. CTIA's proposal, however, leaves this information out.

Also problematic is CTIA's proposal to give the Commission national, rather than California specific, data for each report.²⁰ This inundation of useless information would delay investigation efforts by the Commission, as well as shift the burden to the Commission to sift through hundreds, perhaps thousands, of campaigns to determine what is relevant to California.

Another troubling aspect of CTIA's proposal is the lack of rules to address cramming deterrence. Under CTIA's rules, a third party service provider could have multiple active campaigns and/or short codes at any given time, regardless of whether one of its campaigns and or/short codes had been terminated or suspended due to cramming. Nothing in CTIA's rules prohibit or prevent a service provider engaged in cramming from returning with a similarly harmful scheme under a different campaign and/or short code. Further, CTIA's proposal ignores imposing responsibility on wireless carriers to report their own cramming ("first party cramming"). The 2010 ACR acknowledged that BTCs should also report complaints against themselves, which includes "any charge that resulted from false and misleading, or deceptive representations."²¹ DRA presented evidence in its previous reply comments that first

²⁰ CTIA Supplemental Comments (August 6, 2010) at 6.

²¹ See 2010ACR, Rule 1.6 – Definition of Unauthorized Charge.

party cramming is a problem consumers face, and is perpetrated by both wireline and wireless providers.

Moreover, each of CTIA's proposed reports is defective in that the information to be reported is left to the discretion of wireless carriers. Under CTIA's proposal, each wireless carrier would have the discretion to terminate or suspend a campaign and/or short code only when the wireless carrier determines or suspects that cramming has occurred. However, the proposal fails to provide any objective criteria for how that determination would be made. More importantly, the Commission is left in the dark about when, or if, a wireless carrier would terminate or suspend a third party service provider engaged in cramming. Remarkably, under CTIA's proposal termination or suspension of a campaign due to cramming does not equate to termination or suspension of the responsible service provider.

Finally, CTIA's proposal to have separate rules for wireless carriers would not be competitively neutral. Their rules call for less reporting responsibilities than those already imposed on wireline carriers.

3. CTIA's Proposal Misses Key Elements of Commissioner Bohn's Proposed Rules.

CTIA's alternative proposal not only fails to meet the Commission's objective in preventing unauthorized charges from being placed on subscribers' bills, it also lacks key elements of Commissioner Bohn's proposed rules to identify promptly any unauthorized billing, bring it to halt, and obtain refunds for subscribers.²² For instance, consistent with Sections 2889.9 and 2890, Commissioner Bohn's 2010 ACR correctly proposes to place ultimate responsibility on Billing Telephone Corporations for all items presented in a subscriber's telephone bill.²³ In addition, the 2010 ACR makes explicit that BTCs must promptly investigate cramming disputes without deflecting the customer to the alleged

²² 2010 ACR at 2.

²³ 2010 ACR at Appendix, A-2.

service provider.²⁴ However, CTIA’s proposal does not mention or address any of these responsibilities.

The 2010 ACR also requires BTCs that offer billing services to third parties to “...take all commercially reasonable steps to ensure that only authorized charges from legitimate service providers are included in the bill.”²⁵ Such a requirement is necessary to counter the financial incentives involved with third party billing. CTIA, however, ignores this important monitoring tool to protect consumers.

The 2010 ACR’s other key objective is to identify and prevent “bad actors” from presenting any further billings in California.²⁶ Therefore, Commissioner Bohn’s proposed rules appropriately require disclosure requirements concerning service providers and mandatory suspension for those with high refund rates. Specifically, the 2010 ACR proposes to require BTCs to verify the identity of and conduct a due diligent investigation of service providers and their principals prior to granting them access to subscribers’ telephone bills, as well as to maintain their contact information.²⁷

Commissioner Bohn’s rules also mandates suspension of third party service providers with unjustified refund rates over 10%. As this comparison of CTIA’s proposal with Commissioner Bohn’s proposed rules show, CTIA’s proposal is fatally flawed. The Commission should thus reject it.

B. THE COMMISSION SHOULD STRIKE CTIA’S PROPOSAL FROM THE RECORD AS PROCEDURALLY IMPROPER; IT ALSO MERELY RESTATES THEIR PAST POSITIONS.

As the comment cycle for parties to present alternative proposals to Commissioner Bohn’s proposed rules elapsed in April 2010, the Commission should strike CTIA’s supplemental comments, including its latest proposal, from the record. Allowing CTIA

²⁴ D.06-03-013 (*CPI Decision*) held the same thing—Telephone companies, regardless of whether they originate a charge, have the ultimate responsibility for handling customer complaints. (D.06-03-013 at 91).

²⁵ 2010 ACR at Appendix, A-2; *See also* DRA Comments on 2010 ACR (March 22, 2010) at 9.

²⁶ 2010 ACR at 2.

²⁷ 2010 ACR at Appendix A-3.

to submit a new alternative proposal violates the other parties' due process rights because the deadlines for comments in the comments cycle is long passed, and CTIA is being provided with an additional opportunity to propose rules that was not provided to the other parties. At a minimum, DRA requests permission to submit its own additional proposals at the appropriate time.

Since the commencement of this phase of the proceeding (four years ago) – to extend cramming reporting requirements to wireless carriers and resellers – parties have had ample opportunity to vet the issues involved with implementing the anti-cramming statutes and to present their own proposals for reporting rules.²⁸ In fact, the comprehensive set of rules proposed in Commissioner Bohn's February 12, 2010 ACR reflects the Commissioner's due consideration of the extensive record already established. Specifically, the ACR stated:

On February 22, 2008, the then-assigned Commissioner issued his Assigned Commissioner Ruling initiating a process by which the Commission would develop a record upon which to issue a final decision adopting cramming reporting requirements. The ruling provided for opening and reply comments on numerous issues.

Based on these comments and the existing rules from D.00-03-020, D.00-11-015, and General Order 168, Part 4, Commission staff has prepared a standard set of rules for billing which apply to all California telephone companies, including wireless. These rules cover subscriber authorization, requirements for offering billing services, dispute resolution responsibility, and reporting requirements.

²⁸ After the Commission issued D.06-03-013 (*CPI Decision*), it held a workshop to discuss the complaint reporting rules. Based on the workshop, staff of the Commission's Consumer Protection and Safety Division (Staff) prepared a Report which presented its recommendations on rules to implement section 2889.9(d)'s complaint reporting requirements. Thereafter, the Commission issued a comprehensive ACR in February 2008 incorporating Staff's recommendations and sought comment from parties. Parties (including numerous industry representatives) submitted extensive comments on the 2008 ACR and presented their own proposals for complaint reporting or alternatives to reporting. After submission of comments in 2008, the Commission had a substantial record from which to issue a proposed decision. However, the Assigned Commissioner gave parties another bite at the apple with a more refined ACR on February 12, 2010. The 2010 ACR combined the two previously sets of cramming rules into a comprehensive one, and sought further comment from parties.

With this ruling, I am seeking comments on the attached proposed rules.²⁹

When given a second opportunity in the 2010 ACR to provide a new proposal, the wireless industry resubmitted their 2008 proposal which only required wireless carriers to provide the Commission with termination reports in lieu of cramming complaint reports or other obligations. To support their 2008 Termination Reporting proposal, wireless carriers argued that they do not track cramming complaints and that it would be too costly for them to do so.³⁰ However, Commissioner Bohn's subsequent 2010 ACR effectively rejected these arguments by not adopting the wireless carriers' 2008 Termination Reporting proposal and requiring among other obligations, that wireless carriers report all cramming complaints.

Here in this latest proposal, CTIA and the Wireless Parties assert that this latest proposal includes more robust rules than its previous Termination Reporting proposal.³¹ As demonstrated above, however, the three superficial "reports" (suspension, refund, and call blocking) added to CTIA's latest proposal would generate data as useless to the Commission as the termination reports. Thus, in substance, these proposals are essentially the same.

The Commission should also be wary of CTIA's inference in its supplemental comments that its proposal was the result of collaboration or negotiations between the parties and Commission staff.³² DRA did not have any input regarding the terms of this proposal. Moreover, the comments are suspiciously vague about the type of input Commission staff had on the proposal, as well as which Commission staff was involved in providing input. This latest proposal by CTIA is nothing more than a thinly-veiled

²⁹ *Assigned Commissioner's Ruling Requesting Comment on Proposed California Telephone Corporation Billing Rules*, February 12, 2010, at 1-2.

³⁰ While wireless carriers continue to argue that complaint reporting would be too costly, they have never substantiated this assertion with any cost studies or other corroborating evidence.

³¹ CTIA Supplemental Comments (August 6, 2010) at 2.

³² See CTIA Supplemental Comments (August 6, 2010) at 2.

attempt to delay the Commission from carrying out its intent to step up its enforcement efforts by updating its cramming rules to include wireless carriers.³³

IV. CONCLUSION

DRA's analysis of CTIA's proposal demonstrates how useless the subjective reports proposed by CTIA would be to the Commission in its efforts to detect, prevent, and deter cramming. Moreover, CTIA's submission of another alternative proposal, when the comment cycle is closed and other parties have not been given additional opportunities, was procedurally improper and thus DRA requests that the latest CTIA proposal be stricken from the record. After years of comments and proposal, the Commission should not further delay the implementation of substantive anti-cramming rules that would finally make wireless carriers accountable for the placement of unauthorized charges on their subscribers' bills. To that end, the Commission should issue a proposed decision that adopts Commissioner Bohn's *California Telephone Corporation Billing Rules* proposed in his February 12, 2010 ACR.

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³³ As background, ten years ago when the Commission first implemented the reporting mandates of section 2889.9(d), the Commission noted that the term "Billing Telephone Company" was a new statutory term that referred to those companies that provided third-party billing. (D.00-03-020 at 13, fn. 5.) At that time, only Incumbent Local Exchange Carriers ("ILECs") provided such service. Therefore, the *Subscriber Complaint Reporting Rules* adopted in D.00-03-020, as modified by D.00-11-015, applied only to wireline carriers. Of significance, however, was the Commission's recognition that the term "Billing Telephone Company" was a more inclusive term because other carriers might provide third-party billing in the future. (*Id.* ("This [Billing Telephone Companies] is the new statutory term that refers to those companies that provide third-party billing. Currently, only incumbent local exchange carriers provide such service but this fact may change in the future; hence, the more inclusive term of Billing Telephone Companies.")) Indeed, all wireless carriers are now providing billing and collection services to third parties, thereby making them *Billing Telephone Companies*.

Respectfully submitted,

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August 16, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of **REPLY COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES IN OPPOSITION TO THE SUPPLEMENTAL COMMENTS OF CTIA-THE WIRELESS ASSOCIATION** to the official service list in **R.00-02-004** by using the following service:

E-Mail Service: sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

U.S. Mail Service: mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed on **August 16, 2010** at San Francisco, California.

/s/ CHARLENE D.
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