



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

Rulemaking 06-05-028
(Filed May 25, 2006)

**REPLY COMMENTS
OF THE DIVISION OF RATEPAYER ADVOCATES ON SCOPING
MEMO AND RULING OF THE ASSIGNED COMMISSIONER
AND ADMINISTRATIVE LAW JUDGE REGARDING THE CALIFORNIA
LIFELINE AND THE CALIFORNIA TELECONNECT FUND**

I. INTRODUCTION

The Division of Ratepayer Advocates (“DRA”) respectfully responds to the comments of other parties on the Assigned Commissioner and Administrative Law Judge’s Scoping Memo and Ruling issued July 13, 2007 (“Scoping Memo”) concerning proposed changes to the Universal Lifeline Telephone Service Program (“ULTS”) and the California Teleconnect Fund (“CTF”). The ULTS program assists and affects a wide segment of the California low-income population. DRA submits that with too many unanswered questions regarding the status of ULTS, the Commission would be well advised to conduct more research and analysis before implementing any reforms. With respect to the CTF, the Commission should ensure that the interests of currently eligible participants are not detrimentally affected by the proposed expansion of CTF eligibility and services.

II. THE UNIVERSAL LIFELINE TELEPHONE SERVICE PROGRAM (ULTS)

Despite the numerous comments filed in this proceeding concerning reform of the ULTS, the lack of significant data to support any of the proposals suggests that the Commission is not ready to move forward with any modifications to the program. In order to accurately portray the current status of the ULTS program, the Commission

should gather data from the community and carriers and conduct independent studies to determine whether changes are even necessary. Some parties caution the Commission about making any changes to the ULTS, arguing that it has been successful and may continue to be even more successful in the future.¹ Other groups like the California Community Technology Policy Group/Latino Issues Forum (“CCTPG/LIF”), Cox, and Disability Rights Advocates (“DisabRA”) also express similar sentiments about adopting a cautious approach to changing the ULTS program.²

A cautious approach is necessary because numerous threshold questions remain either unanswered or unsupported. It is still unclear as to whether any changes should or could be made to the Lifeline program, what those changes should be, and what the results of those changes will be in a deregulated telecommunications environment. DisabRA points out that the Commission has not yet evaluated the potential costs and benefits of changes to Lifeline. As such, the Commission is not in a position to even consider discussing implementation issues.

DisabRA also notes that any revisions to the Lifeline program will significantly impact California’s most vulnerable consumers.³ For the aforementioned reasons, DRA continues to urge the Commission to gather the necessary evidence and data, both community-derived and carrier-based, through workshops, studies, and evidentiary hearings⁴ in order to justify modifications to the ULTS program.

A. The Commission should proceed slowly and systematically with any changes to ULTS.

The widespread impact on California’s low-income population resulting from changes to the ULTS program demands that any changes be incorporated slowly. To coordinate with the January 1, 2009 full rate de-regulation date, Cox recommends waiting

¹ Comments of The Utility Reform Network (“TURN”)/National Consumer Law Center (“NCLC”) at 3.

² Comments of CCTP/LIF at 1, Comments of DisabRA at 1-3, and Comments of Cox at 1.

³ Comments of DisabRA at 1 and 3.

⁴ TURN also supports the use of evidentiary hearings. *See* Comments of TURN at 11.

until then to transition to a fixed benefit.⁵ However, without the prerequisite data on the current ULTS program, DRA is unable to project an appropriate transition date. To the extent that the Commission adopts the fixed benefit approach, DRA recommends that changes to ULTS occur on the actual date the ULTS program is switched to a fixed benefit. What is clear is that the Commission should make every effort to ensure that adequate time is allowed to research, analyze, and implement ULTS changes.

B. More research is required before the Commission can adopt a fixed benefit approach.

Cox, Sprint Nextel, AT&T, and Frontier all support a change to a fixed-benefit subsidy. However, each of them offers a radically different version of how the benefit would be implemented.

Cox believes that a “[f]ixed support amount is consistent with the [g]oals of the Lifeline Program and will [a]ssist [l]ifeline [s]ubscribers.”⁶ AT&T states that it supports the transition to a fixed benefit subsidy, but suggests that the Commission design a Lifeline rate structure before implementing a fixed benefit.⁷ Sprint Nextel discusses a combination of set support in addition to a rate equivalent to 50% of the basic service rate and suggests a fluctuating set support amount based upon the Consumer Price Index (“CPI”) or other appropriate Bureau of Labor Statistics (“BLS”) inflation factor.⁸ However, Sprint Nextel fails to identify what the initial “basic rate” should be, as they decline to make a determination about the baseline.

Frontier states that the adoption of a fixed benefit will give California Lifeline customers more flexibility in selecting alternative telecommunication services.⁹ Additionally, Frontier states that the Lifeline benefit should be recalculated whenever the

⁵ Comments of Cox at 1. DRA supports the idea that such a delay in implementation would allow the Commission time to gather data to support any decisions made about Lifeline changes.

⁶ Comments of Cox at 1.

⁷ Comments of AT&T at 2.

⁸ Comments of Sprint Nextel at 7-8.

⁹ Comments of Frontier at 1-2.

B-fund benchmark is adjusted by the Commission. However, Frontier provides no support, nor does it articulate viable reasons for the Lifeline benefit to be linked in any way to the B-Fund high-cost benchmark. Thus, without any evidence to substantiate this proposal, the Commission should not consider recalculating the Lifeline benefit based upon the CHCF-B.

Though many parties supported the fixed-benefit approach, other parties, like Verizon, question whether a fixed benefit is even possible, given the pricing freedoms that will be granted to the Incumbent Local Exchange Carriers “(ILECs”) on January 1, 2009.¹⁰ Concerns about how a fixed benefit would cause the Lifeline fund to balloon, possibly out of control, were also addressed in Verizon’s comments.¹¹

DRA shares some of Verizon’s concerns about the fund becoming too expensive. However, DRA notes that the size of the fund will probably increase somewhat regardless of a fixed benefit. Once full pricing flexibility is achieved, even if a single Lifeline rate is offered, as it is now, the difference between that rate and any increased price by the carrier would likely have to be funded as the program is currently structured. With these considerations in mind, it is evident that the collection of data will be necessary to determine the costs and benefits of changing Lifeline, to evaluate the Fund after January 1, 2009, and to monitor the effects of pricing flexibility. Additionally, there is insufficient evidence currently in the record to explore other options for program change to address this concern, e.g., perhaps capping the amount a service provider can draw from the Fund irrespective of that service provider’s actual rate.

Underscoring the insufficiency of current data for estimating either the amounts or effects of a fixed benefit system, DisabRA notes that the resulting disparity of rates will also result in varying benefits to consumers. DisabRA also points out that if a fixed benefit is adopted, the Commission must monitor carriers’ service offerings.¹²

¹⁰ Comments of Verizon at 3.

¹¹ Comments of Verizon at 3.

¹² Comments of DisabRA at 7.

TURN/NCLC also oppose a fixed benefit based on the consideration that the Lifeline program will continue to be more successful in the future.¹³ They stress that “any changes should meet a very high burden of proof to ensure that modifications will not detrimentally impact the ability to meet the program’s goals.”¹⁴

DRA continues to support some type of recalculation of the Lifeline subsidy, but also recommends a periodic Commission review of that subsidy. Additionally, DRA recommends that a review be conducted on an annual basis beginning from the actual date of the change over to a fixed benefit. Although DRA does not *conceptually* oppose a transition to a fixed benefit, DRA reiterates its position that the Commission should conduct both a sensitivity study (costs compared to benefits) and an affordability study to obtain a realistic picture of how proposed changes will effect the program.

C. There is insufficient data to support any proposed initial support amount.

Although many parties concurred that an initial support amount was just, amounts proposed by the parties varied significantly. However, no party submitted any data or analysis to support any of the amounts suggested. DRA reiterates that the Commission should conduct both a sensitivity and affordability study before reaching a conclusion on the monetary amount of this initial support.

DisabRA also shares concerns about formulating a support amount without enough data, noting that no party had a reasonable, supported suggestion for a fixed benefit amount.¹⁵ They also stated that the Commission should seek more input from the community and carriers, and formulate a “well-considered, well-drafted plan for switching to a flat benefit amount.”¹⁶

TURN/NCLC describe many inherent problems in setting a fixed benefit amount, including, the rate freeze on basic rates until January 1, 2009, the potential increases

¹³ Comments of TURN/NCLC at 3.

¹⁴ Comments of TURN/NCLC at 3.

¹⁵ Comments of DisabRA at 6.

¹⁶ Comments of DisabRA at 6.

thereafter, and the variability in rates between carriers that will likely increase under de-regulation and geographic deaveraging.¹⁷ Considering the numerous concerns expressed by various parties, the sensitivity and affordability studies would be a vital step toward obtaining the consumer and carrier data necessary for an informed decision regarding a fixed benefit amount.

Finally, the Commission should not entertain Frontier's erroneous suggestion that the high cost benchmark of \$36 adopted in the California High Cost Fund B Proposed Decision be used as a "relevant measure of affordability" for use in Lifeline.¹⁸ As the adopted Decision in the CHCF-B proceeding (D.07-09-020) explicitly states, the \$36 figure is to be used only "for the limited purpose of setting a high-cost benchmark." The Decision further states that "[t]he \$36 benchmark, however, is in no way intended to serve as a cap on basic rate levels, or as a determination that retail rates for basic service alone as high as \$36 would be affordable. Likewise, this benchmark level does not indicate that we believe it is appropriate for basic service to rise to a level of \$36."¹⁹

It is clear from D.07-09-020 that the \$36 high-cost benchmark was adopted for one specific purpose—to be used as a benchmark level for determining high-cost areas eligible to receive a subsidy through CHCF-B. Furthermore, the \$36 benchmark is by no means a measure of affordability and cannot be a basis for determining a set support amount for Lifeline, a program completely separate from the CHCF-B and one which serves a very different purpose. Any set amount the Commission decides upon for Lifeline must be based on solid data. Convenient or arbitrary numbers that have no attachment to a definition of affordability, much less what constitutes affordability for low-income consumers, should not be considered.

¹⁷ Comments of TURN/NCLC at 4-5.

¹⁸ Comments of Frontier at 3.

¹⁹ D.07-09-020 at 47.

D. No justification exists to reimburse carrier's administrative costs for providing Lifeline service.

Not surprisingly, carriers who receive reimbursement for administrative costs were adamant about continued reimbursement. Cox, the Small LECs, Surewest, AT&T, Frontier-Citizens, and Verizon all support the continuation of reimbursing carriers for their administrative costs. Cox argues that Lifeline costs are more than just the normal cost of doing business.²⁰ Surewest claims that costs may increase, and states that while it is difficult to assess the full range of administrative costs if changes were to be made, there is no record to show that they would diminish.²¹

The lack of evidence to show that administrative costs would diminish is not in itself dispositive that they will increase. More importantly, DRA stresses that there is nothing in the record that justifies the necessity for reimbursement of administrative costs. No carrier showed that the administration costs associated with Lifeline customers exceeded the administration costs associated with all other customers. Without such a showing on the record, the Commission should seriously reconsider the desirability of, or need for, reimbursement of asserted administrative costs.

Just as administration costs are not unique for Lifeline customers, nor are the costs of acquiring Lifeline customers unique. Customer acquisitions of Lifeline and non-Lifeline customers alike, are a major aspect of doing business, and therefore should be viewed as a normal business expense. Additionally, given the de-regulated market, the carrier should bear the administrative costs that are associated with customer acquisition and retention, including, but not limited to, the marketing and supply of service to all of its customers.²²

Sprint Nextel suggested that reimbursement of carriers' administrative costs need not necessarily occur, especially if the set support amount is in the higher range.²³ While

²⁰ Comments of Cox at 3.

²¹ Comments of Surewest at 4.

²² Comments of DRA at 7, and the August 15th, 2007 "Modernizing Lifeline Workshop", transcript at 24-25.

²³ Comments of Sprint Nextel at 8.

DRA agrees that reimbursement of administrative costs is not necessary, we disagree with linking it to the amount of a fixed benefit.

E. The first step in reforming the ULTS program should be to hold workshops to evaluate its current state.

Again, DRA recommends that the Commission hold workshops to address the numerous issues surrounding the ULTS program. While DRA maintains its initial proposal of a minimum of a one-year transition period to the new Lifeline program with workshops related to the education and marketing necessary to successfully transition to the new program²⁴, other workshops may be needed. Other workshops should focus on determining an amount for the set benefit which would be calculated from solid data gathered, rather than the conjectures and speculation that have thus far been a hallmark of this proceeding.

Cox and AT&T also support a transitional period, recognizing the confusion and lower participation levels caused by the recent certification and verification changes made to Lifeline.²⁵ They also see the need for education, marketing, and making changes to carriers' systems.²⁶

TURN/NCLC advise the Commission to hold evidentiary hearings should changes occur that affect the ULTS rates paid by consumers.²⁷ DRA concurs with the concerns expressed to justify holding evidentiary hearings. Given all of the concerns expressed about changes to Lifeline, the unanswered questions regarding the costs and benefits of potential changes, the lack of data supporting any recommended changes and the vulnerability of the consumers affected by a changed program, the Commission should spend more time and energy to resolve these issues so that the Lifeline program can continue to be successful. As such, the collection of data from the carriers, consumers,

²⁴ Comments of DRA at 7-8.

²⁵ Comments of Cox at 2.

²⁶ Comments of AT&T at 3.

²⁷ Comments of TURN/NCLC at 11.

and the affordability and sensitivity studies should be gathered in preparation for hearings.

F. The Commission should continue to explore the idea of including wireless in the ULTS program.

DRA sees the benefits²⁸ of including wireless in the ULTS program for low-income consumers, but urges the Commission to explore this concept with caution. Other parties share a similar qualified support of wireless in the ULTS program. CCTPG/LIF support an expansion only if it does not cause unnecessary changes to the ULTS program.²⁹ Greenlining also supports the inclusion of wireless, citing its importance to the low-income and minority communities and claiming that wireless is perhaps more useful and needed than landlines.³⁰ Sprint Nextel claims that an inclusion of wireless will encourage further wireless competition in the California telecommunications market, as well as fill a necessary niche for low-income consumers that are the most in need of a wireless option.³¹

DRA applauds the Commission's efforts to update the Lifeline Program to accommodate emerging technology in the largely rate de-regulated market. However, the Commission should avoid making immediate changes to the Lifeline program and avoid making multiple changes concurrently as there are many unresolved questions that will affect the costs and the effectiveness of the Lifeline program.

Some problems that require immediate attention include DisabRA's concern over what happens when the wireless handset leaves the household, especially considering that each household only receives Lifeline benefits for one line.³² TURN/NCLC highlight other significant problems stating that "the devil is in the details," most of which "run the

²⁸ These benefits include: Telephone connectivity for certain ratepayers who otherwise might not be able to afford a landline; portability of service; ability to contact family and/or employers from remote locations.

²⁹ Comments of CCTPG/LIF at 2.

³⁰ Comments of Greenlining at 4-5.

³¹ Comments of Sprint Nextel at 2.

³² Comments of DisabRA at 4.

gamut from identification of funding sources to support higher-priced wireless plans to legal issues relating to the authority of the Commission to enable a LifeLine subscriber to apply the benefit to bundles and to a wireless LifeLine offering.”³³

Verizon acknowledges that the Commission must be concerned with ensuring that the ULTS program continues to work, and raises a list of unresolved concerns regarding wireless inclusion, including the lack of a definition for “affordability.”³⁴

If the Commission decides to include wireless in the ULTS program, it should do so only after implementing initial changes to the program, as discussed earlier. This kind of phased-in approach will allow the Commission to monitor the effect of each change to the Lifeline program, and quickly react to any sudden negative consequence of the various changes. If the Commission, and the data, supports adding wireless to the Lifeline program, it should be done after the first triennial review, as proposed by DRA.³⁵

III. CALIFORNIA TELECONNECT FUND (CTF)

A. More research should be conducted before expanding the CTF to include California community colleges.

Most parties agree with DRA that the Commission should not proceed with extending CTF eligibility to California community colleges until it has carefully considered the consequences. Cox, the Small Local Exchange Carriers (“LECs”), Pacific Bell, and Verizon all raise valid concerns about the potential financial strain on the fund.³⁶ CCTPG/LIF note that the Scoping Memo’s proposals were vague and ambiguous³⁷ and similarly, the small LECs state that they “would need further detail about the specific

³³ Comments of TURN/NCLC at 7.

³⁴ Comments of Verizon at 9-10.

³⁵ Comments of DRA at 3-5 and 9.

³⁶ Comments of Cox at 5; Comments of Small LECs at 6; Comments of Pacific Bell at 7; Comments of Verizon at 16.

³⁷ Comments of CCTP/LIF at 7.

proposals to fully evaluate whether or not they should be pursued.”³⁸ CCTPG/LIF also warn that an expansion of CTF was not statutorily supported.³⁹

In addition to the possible financial strain to the CTF and the uncertainty of the proposed changes, expanding the CTF to community colleges may not be necessary, as California community colleges currently receive tax support for student and staff computing centers. The comments of the State Librarian of California⁴⁰ draw incorrect parallels between community-based nonprofit organizations (“CBO’s”) and tax-exempt community colleges. While both types of entities may provide some similar services, community colleges do not serve low-income communities in the same manner and extent as CBO’s. Further, CBO’s do not receive the same tax support as community colleges. Based on these distinctions, the need to fund community colleges is not as apparent as the need to maintain CTF funds for eligible CBO’s.

On the other hand, to the extent that community colleges provide Internet access to Californians who otherwise cannot obtain access, then community colleges may merit the type of CTF support provided to CBO’s. If the Commission extends the CTF to community colleges, it should initially support only telecommunications monthly service connection costs for those community college facilities that provide services similar to that of public libraries: free and open Internet access to the underserved public. As long as fundamental issues, like those discussed above, remain unresolved, the Commission should not extend CTF eligibility to California community colleges.

³⁸ Comments of Small LECs at 6.

³⁹ Comments of CCTPG/LIF at 7.

⁴⁰ Comments of the State Librarian of California on Scoping memo and Ruling of the Assigned Commissioner and Administrative Law Judge regarding Teleconnect Fund Issues to be Considered, August 24, 2007, at 3-4.

B. Without further clarification on which E-rate services was contemplated by the Scoping Memo, parties are unable to appropriately respond to the questions posed.

The Scoping Memo failed to identify with specificity which E-rate services the CTF should mirror. Consequently, parties have set forth disparate interpretations of the services contemplated by the Scoping Memo.

Cox recommends that Internet access from non-certificated entities be added as a CTF eligible service to “give CTF program participants more choices by expanding the competitive services available to them.”⁴¹ Cox points out that “[s]ince the Commission has already elected to reimburse carriers for providing one type of information service, it should mirror the E-rate program and allow non-certificated entities to provide Internet access services and seek reimbursement from the CTF”⁴² so as to “ensure that the CTF program promotes broader consumer choice in a competitively-neutral manner.”⁴³

Currently, E-Rate only applies to schools and libraries, but not to community technology centers. However, community technology centers are eligible for CTF funding. CCTPG/LIF argue that mirroring CTF services to that of the federal E-rate services could be interpreted as only extending the expanded CTF services to E-rate eligible participants.⁴⁴ DRA also agrees that any expanded CTF service coverage should apply equally to all eligible entities.

Based upon the varied interpretations provided by the parties in response to this issue, DRA recommends that the Commission submit their questions to the CTF Advisory Committee (CTF-AC) for consideration on the scope of services that should mirror those of E-Rate.

⁴¹ Opening Comments of Cox Communications and Time Warner Cable Information Services (California), LLC at 5-6

⁴² *Id* at 5-6

⁴³ *Id* at 5-6.

⁴⁴ Comments of CCTPG/LIF at 8.

C. There is no justification for an E-Rate prerequisite to CTF eligibility.

There may be some schools and libraries that could qualify for both E-rate and CTF funding, but for one reason or another receive only CTF funding. The Commission already has an effective method for fairly allocating CTF funds to such E-Rate eligible entities, by calculating into the entity's CTF support amount an estimation of the E-Rate amount that the entity would have received from E-Rate.⁴⁵ This is an appropriate calculation method because it is conceivable that many small entities do not have the administrative staff to maneuver through the E-Rate application process and thereby limited to applying for the CTF.

Nonetheless, Verizon proposes what is essentially a punishment of entities who are eligible for E-Rate, but who fail to apply, by completely barring them from CTF eligibility.⁴⁶ This approach apparently assumes that all E-Rate and CTF eligible schools and libraries have sufficient resources to allow them to navigate the complex and cumbersome E-Rate application process. As Verizon noted, “[t]he E-rate application... is 14 pages in length, requires listing of all services that the school or library will use for the application year, and must be filed annually.”⁴⁷ In contrast, the current CTF application process consists of a one page application with a one-time filing for permanent eligibility.⁴⁸

With the recognized hurdles of the E-Rate application process, it is unreasonable to require entities already disadvantaged by a lack of resources and staff to apply for E-Rate before they can become eligible for the CTF. Further, Verizon failed to offer any evidence concerning any benefits to this approach. Therefore, DRA recommends that the Commission maintain its current method of imputing an E-Rate to reduce the CTF support rather than consider an unwarranted E-Rate prerequisite. Ultimately, the

⁴⁵ See CPUC, Revised Administrative Letter No. 10B, June 1, 2006, on the CPUC website, for the Commission's current method of imputing an E-Rate to reduce the CTF support.

⁴⁶ Comments of Verizon at 16.

⁴⁷ *Id* at 17.

⁴⁸ *Id* at 16.

Commission should consider collaborating with the FCC and other states in an effort to simplify the E-Rate application process.

D. The CTF should not be used to fund infrastructure costs of California Telemedicine projects.

There were few comments that discussed funding for the Telemedicine program. While DRA supports California Telemedicine organizations' efforts to obtain FCC pilot program funding, we continue to question the use of CTF funds to fund program infrastructure costs. AT&T noted that unless "the legislature has enacted and funded a particular grant program to be funded by CTF, such as SB 909, the Commission cannot authorize the distribution of CTF funds for any purpose other than to discount monthly recurring advanced telecommunications services."⁴⁹ Moreover, CCTPG/LIF state that it "is premature to invest in telemedicine pilots until the problems with the CBO component of the program are addressed and until analysis shows there is sufficient funding to fulfill CTF's core mission of connecting CBO's."⁵⁰ Without proper authority and justification, the Commission should not provide funding for Telemedicine projects through the CTF.

IV. DEAF AND DISABLED TELECOMMUNICATIONS PROGRAM (DDTP)

A. DDTP income limitations should not be linked to the Universal Lifeline Telephone Service Program (ULTS).

The Telecommunications Access for the Deaf and Disabled Administrative Committee's ("TADDAC") Opening Comments voiced concerns about the Commission's imposition of an income eligibility requirement on the current wireless pilot program. "Currently the sole eligibility requirement is that program participants must be certified by certain statutorily approved professionals to receive equipment appropriate for their particular disability."⁵¹ DRA agrees, and reiterates that "[t]he P.U. Code makes it clear that only the purchase of *equipment* should be considered for means

⁴⁹ AT&T Comments at 10.

⁵⁰ CCTPG/LIF Comments at 9.

⁵¹ Comments of TADDAC at 1.

testing.”⁵² Additionally, “[t]here continues to be ample room for equipment expenditures within the present budget structure and, therefore, a major rationale for means-testing is absent.”⁵³ In view of the fact that the current DDPT program is adequately funded, there is no justification or evidence to support including an income eligibility requirement.

V. CONCLUSION

For the foregoing reasons, DRA respectfully requests that the Commission adopt its recommendations.

Respectfully submitted,

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September 14, 2007

⁵² Comments of DRA at 39.

⁵³ *Id* at 39.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of “REPLY COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON SCOPING MEMO AND RULING OF THE ASSIGNED COMMISSIONER AND ADMINISTRATIVE LAW JUDGE REGARDING THE CALIFORNIA LIFELINE AND CALIFORNIA TELECONNECT FUND” in **R.06-05-028** by using the following service:

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Executed on the 14th day of September 2007 at San Francisco, California.

/s/ ALBERT HILL

Albert Hill

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