

COMPARISON OF URF PROPOSALS

| ISSUE | ORA | SBC-CA | Verizon-CA | Citizens (Frontier) | SureWest | MCI ¹ | Cox | CCTA | Time Warner Telecom | CSBR/CS BA | DOD | TURN | DRA ² |
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| PRICING FLEXIBILITY | | | | | | | | | | | | | |
| <p>“Basic” Service definition for pricing flexibility proposal</p> <p>(Not intended to redefine residential basic service in D.96-10-066)</p> | <p>Primary res, bus lines, and PBX trunks, incl: local usage, ZUM, EAS, recurring and non recurring charges; addl lines for bus/PBX trunks; toll restriction, caller ID blocking and information service blocking. Possible Phase 2 issue: addl svcs for the disabled. [May be better handled through a competitively neutral credit to qualifying customers.]</p> | <p>Primary residential line including: local usage, ZUM, EAS and recurring charges.</p> | <p>Primary residential and business single line and non recurring charges for service establishment thereof.</p> <p>Does not apply to local usage for measured rate services; Key: PBX; multi-line services; or ZUM.</p> | <p>Primary residential line including: local usage, ZUM, EAS and non-recurring charges.</p> | <p>Primary residential line including: local usage, ZUM, EAS and non-recurring charges.</p> | <p>No special treatment for basic services.</p> | <p>All flat rate residential lines and single-line business – includes all services that require USF support.</p> | <p>All flat rate residential lines and single-line business – includes all services that require USF support.</p> | <p>All flat rate residential lines and single-line business – includes all services that require USF support.</p> | <p>Residence and Business local exchange service.</p> | <p>Residence and business primary and additional lines; PBX trunks; recurring and non recurring charges; local usage, ZUM and EAS; public telephone; remote call forwarding; telephone assistance; toll blocking.</p> | <p>Res Basic Local Exhge Svc incl Res bundles and Small Business service – up to five lines (Basket 1). Local usage, ZUM, EAS, recurring and non recurring chrgs. Primary bus line incl local usage. Essential vertical svcs such as toll restriction, call trace, CLASS services and others, including those identified by DRA.</p> | <p>Same as TURN plus: services that are necessary for people with disabilities. Principle that “basic services” include services that are necessary for people with disabilities established in Phase I. Details established in Phase II.</p> |
| <p>Primary residential lines</p> | <p>Price-capped at current levels (subject to continuous monitoring and review after 3 years).</p> <p>Full downward pricing flexibility.</p> | <p>Maintained at current levels “temporarily” until no later than June 1, 2007, to allow a reasonable time for review of public policy programs in Phase 2.</p> | <p>Price-capped at current level; automatically eliminated after 3 years.</p> <p>Full downward Flexibility.</p> | <p>Price-capped at current levels “temporarily” until June 1, 2007, or until 2 years from the conclusion of Phase I of the proceeding at the latest. This will allow a reasonable time for</p> | <p>Price-capped at current levels “temporarily” until June 1, 2007, or until 2 years from the conclusion of Phase I of the proceeding at the latest.</p> <p>Full downward Flexibility.</p> | <p>De-tariff, replace with customer contracts.</p> | <p>Establish price caps at current rates or after subsidy rebalancing for 3 years; allow inflation adjustments annually thereafter.</p> <p>Price must be set</p> | <p>Establish price caps at current rates for 3 years; allow inflation adjustments annually thereafter.</p> | <p>Establish price caps at current rates or after rebalancing for 3 years; allow inflation adjustments annually thereafter.</p> <p>Price above a cost-based price floor.</p> | <p>Price capped for near future.</p> <p>Downward pricing flexibility.</p> | <p>Revenue cap as basic service.).</p> <p>Review in 3 years.</p> | <p>Prices capped at current rates / downward flexibility limited to price floors (Basket 1).</p> | <p>Same as TURN</p> |

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|--|---|------------------|--|---|------------------|---|---|--|---|--|---|--|---|
| | | | | review of public policy programs in Phase II. Full downward Flexibility. | | | above a cost-based price floor. | | | | | | |
| Additional residential lines | Flexibly priced. | Flexibly priced. | Flexibly priced. | Flexibly priced. | Flexibly priced. | De-tariff, replace with customer contracts. | No distinction made for addl lines. Treat all residential lines the same. | No distinction made for addl lines. Treat all residential lines the same. Contingent on first reforming the CHCF-B and eliminating the presumption of revenue neutrality. | No distinction made for addl lines. Treat all residential lines the same. Eliminate revenue neutrality as a regulatory principle and reform CHCF-B prior to changes. | Price capped for near future. Downward pricing flexibility. | Revenue cap as basic service. Review in 3 years.. | Prices increased based on price cap mechanism / decreases limited to price floors (Basket 2). | Same as TURN, but price caps where additional lines are necessary for people with disabilities (details established in Phase II). |
| Single-line business services (1MB) | Price-capped at current levels (subject to continuous monitoring and review after 3 years). | Flexibly priced. | Price-capped at current level (only the access line itself, not usage); automatically eliminated after 3 years; full downward flexibility. | Flexibly priced. | Flexibly priced. | De-tariff, replace with customer contracts. | Price must be set above a cost-based price floor. Establish price caps at current rates or after rebalancing for 3 years; allow inflation adjustments annually thereafter. | Retain price floor. Establish price caps at current rates for 3 years; allow inflation adjustments annually thereafter. | Price above a cost-based price floor. Establish price caps at current rates or after rebalancing for 3 years; allow inflation adjustments annually thereafter. | Price capped for near future. Downward pricing flexibility. | Revenue cap as basic service. No limit to number of lines. Review in 3 years. | Prices increased based on price cap mechanism / decreases limited to price floors – up to 5 lines. (Basket 3). | Not addressed |
| PBX trunks | Treated the same as | Flexibly priced. | Flexibly priced. | Flexibly priced. | Flexibly priced. | De-tariff, replace | Flexibly priced. | Flexibly priced. | Flexibly priced. | Not addressed. | Revenue cap as basic | Not specifically | Not addressed |

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|--|---|--|--|---|--|---|--------------------------------|--|--|------------------|---|--|--|
| | business basic services. Price-capped at current levels (subject to continuous monitoring and review after a 3-year period.) | | | | | with customer contracts. | | Contingent upon first reforming CHCF-B and elimination of presumption of revenue neutrality. | Contingent upon reforming CHCF-B prior to PBX trunk pricing flex and elimination of presumption of revenue neutrality. | | service to T-1 level.. Additional PBX trunks flexibly priced Review in 3 years. | addressed – unclear as to which basket. | |
| Residential inside wire maintenance plans | Price-capped at current levels for 3 years (subject to continuous monitoring and review after a 3-year period.) | Flexibly priced. | Flexibly priced. | Full pricing flexibility starting in Phase I; detariff in Phase II; | Flexibly priced. | De-tariff, replace with customer contracts. | Not addressed. | Not addressed. | Not addressed. | Not addressed. | Not addressed. | Price-capped at current levels for 3 years (renewable after review). | Same as TURN. |
| E911 (PSAP) | 911 services are excluded from pricing flexibility, including end users' access to 911. | 911 services are excluded from pricing flexibility proposal. | 911 services are excluded from pricing flexibility proposal. | 911 services are excluded from pricing flexibility proposal. | 911 services are excluded from pricing flexibility proposal. | Not addressed. | Not addressed. | Not addressed. | Not addressed. | Not addressed. | 911 services are excluded from pricing flexibility proposal.. | 911 services are excluded from pricing flexibility proposal. | 911 services are excluded from pricing flexibility proposal. |
| New services | Flexibly priced. Advice letter filing subject to protest and suspension if questions arise whether a service is truly new. Same disclosure requirements as for bundles. | Flexibly priced. | Flexibly priced. | Flexibly priced. | Flexibly priced. | No regulation of new services. | Flexibly priced, if truly new. | Flexibly priced, if truly new. | Flexibly priced, if truly new. Applicable to ILECs only. | Flexibly priced. | Flexibly priced.. | Price regulated. Make case by case determination. | Same as TURN. |

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|-----------------------------|---|------------------|------------------|--|--|---|---|--|---|------------------------------|------------------|---|---|
| Packages and bundles | Flexibly priced; Full disclosure to customers re: ability to buy individual price regulated services at regulated rates, rather than bundles. | Flexibly priced. | Flexibly priced. | Flexibly priced. No limitations on bundling. | Flexibly priced. No limitations on bundling. | De-tariff, replace with customer contracts. | Flexibly priced, except bundles that include basic service must impute basic service price. | Flexibly priced, except bundles that include basic service must impute basic service price. Elimination of other existing pricing requirements for bundles contingent upon first reforming CHCF-B and elimination of presumption of revenue neutrality. | No bundling of basic service with enhanced services permitted , if enhanced service is not available separately e.g. Naked DSL. All bundles that include partially competitive service must use sum of the price floors or tariffed rate for imputation. Elimination of other existing pricing requirements for bundles, contingent upon first reforming CHCF-B and elimination of presumption of revenue neutrality. Applicable to ILECs only. | Flexibly priced for bundles. | Flexibly priced. | Prices increased based on price cap mechanism / decreases limited to price floors (Basket 2). | Same as TURN plus: Where services that are offered as part of a bundle are not accessible, people with disabilities should be able to eliminate such services and still get the bundle-related savings for the other services. Principle established in Phase I. Details established in Phase II. |

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|-----------------------------------|--|--|--------------------------------------|-------------------------------|-------------------------------|----------------------------|---|--|--|------------------|--------------------------------------|--|---|
| Promotions | No limitations; informational advice letter filing only, subject to protest in some cases (to be determined in Phase 2.) | No limitations. One-day notice via letter to CPUC's Executive Director. | No limitations. | No limitations. | No limitations. | No limitations. | Prohibit geographic-specific promos and promos that involve any service or bundle containing a service subsidized by CHCF-B. Limit promos for the same service to 90 days in a 12-month period, and retain price floor requirements for promos. Limit promos for the same service to 90 days in a 12-month period, and retain ILEC price floor requirements for promos. Agree with ILEC/CLEC parity for most other rules. Agree with concept of ILEC/CLEC parity for most other rules | Prohibit geographic-specific promos and promos that involve any service or bundle containing a service subsidized by CHCF-B. Limit promos for the same service to 90 days in a 12-month period, and retain price floor requirements for promos. Agree with ILEC/CLEC parity for most other rules. However expansion of existing flexibility for ILECs contingent upon prior CHCF-B reform and the elimination of the presumption of revenue neutrality. | Prohibit geographic-specific promos and promos that involve any service or bundle containing a service subsidized by CHCF-B. Limit promos for the same service to 90 days in a 12-month period, and retain price floor requirements for promos. In Reply suggest ILEC/CLEC parity for most rules incl. time limit, but ILECs price floor reqmt retained. Eliminate revenue neutrality as a regulatory principle and reform CHCF-B prior to change.. | Flexibly priced. | No limitations. 1-day notice. | Time limits of 90 days on promotions. Beyond 90 days must be offered for resale. | Same as TURN plus: Providers should be required to make customers with disabilities aware of the services and products that they provide for their benefit. Principle regarding the need to provide such information established in Phase I. Details established in Phase II. |
| Relationship of CHCF-B to pricing | No recoupment of price/revenue | Phase 2 issue. Address | Issues re CHCF-B need not nor should | Pricing flexibility and other | Pricing flexibility and other | Universal service needs to | Prior to allowing ILECs to | No pricing flexibility for the ILECs | No pricing flexibility for ILECs until | | CHCF-B subsidy to appear as | No recoupment of price/revenue | Not addressed |

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|-----------------------------|--|--|--|--|---|--|---|--------------------------|---------------------|------------|--|--|------------------|
| flexibility proposal | decreases from CHCF-B; no geographically deaveraged pricing flexibility for primary residential lines until CHCF-B issues are addressed. Phase 2 issue: Problem of unlimited downward pricing flexibility if CHCF-B subsidies are not available to all competitors. Monitor for possible effects on competition and promptly correct if problems noted. | implications of full pricing flex for primary line residential basic service on public policy programs, including CHCF-B. In the interim, draw from CHCF-B will continue to be based on existing primary line residential service rate. | not preclude or delay CPUC's prior adoption of increased pricing flexibility in context of URF. Verizon's proposal for a three-year transitional period allows sufficient time for CPUC to address HCF-B and related issues in a separate proceeding. Verizon will not seek additional CHCF-B draws based on the utilization of any downward pricing flexibility granted in URF. | Phase I URF reforms should occur prior to, and independent of, any CHCF-B examination. Frontier will not seek additional CHCF-B draws resulting from exercising downward pricing flexibility on the residential primary line rate granted in URF. | Phase I URF reforms should occur prior to, and independent of, any CHCF-B examination. SureWest will not seek additional CHCF-B draws based on the utilization of any downward pricing flexibility granted in URF. | be addressed prior to ILEC deregulation. | flexibly price services supported in some parts of the state by HCF-B, eliminate the subsidy. | until CHCF-B is reformed | CHCF-B reformed. | | explicit credits on bills for primary residential lines. | decreases from CHCF-B. Phase 2 issue: Problem of unlimited downward pricing flexibility if CHCF-B subsidies are not available to all competitors. Monitor for possible effects on competition and promptly correct if problems noted. | |

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|--|---|------------|------------|---------------------|------------|------------------|---|--|---|------------------------|--|--|---|
| Price Ceilings (non basic services) | Pricing flexibility permitted only provisionally, for <i>non-essential</i> services, & subject to continuous monitoring, review, and possible reversal after 3-years. | Eliminate. | Eliminate. | Eliminate. | Eliminate. | Eliminate | Eliminate. | Eliminate Contingent upon first reforming CHCF-B and eliminating presumption of revenue neutrality | Oppose absent first addressing CHCF-B reform and eliminating presumption of revenue neutrality. | Elimination – implied. | Eliminate. | Basket approach with price caps adjusted by GDPPI and productivity factor. | Definition of “basic services” must take into account needs of people with disabilities. Principle that “basic services” include services that are necessary for people with disabilities established in Phase I. Details established in Phase II.. |
| Price Floors | Eliminate. Commission does not endorse the legality of price reductions. | Eliminate. | Eliminate. | Eliminate. | Eliminate. | Eliminate | Maintain for ILECs’ basic services and require imputation of the basic service price in bundles that contain a basic service. | Maintain for ILECs’ basic services and require imputation basic service price in bundles that contain a basic service. Elimination of other existing price floor and imputation reqmnts contingent on first reforming CHCF-B and elimination of the presumption of revenue neutrality. | Retain price floors for partially competitive services and use the sum of the price floors formula for imputation | Flexibly priced. | TSLRIC floor for basic services. Imputation for basic local exchange services would be set at the UNE-L floor. | TSLRIC +10% contribution or UNE rates. Investigate further in Phase 2. | Same as TURN |

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|--|---|---|--|--|--|------------------|--|--|--|----------------|--|--|------------------|
| Geographic Deaveraging | All services but only downward flexibility for "basic" services. No recoupment of price/revenue decreases from CHCF-B; no geographically deaveraged pricing of primary residential lines until CHCF-B issues are addressed. | Not expressly proposed in Phase 1 but support. | As a redundant safeguard, maintain statewide rate uniformity for retail tariffed services for 3 years, then eliminate. [Note: Verizon is willing to consider a more narrowly tailored safeguard.] | Flexibility to deaverage all non-basic services in Phase I; maintain company-specific statewide rate uniformity for residential basic service following Phase I; address full deaveraging in Phase II. | Not expressly proposed in Phase 1 but support. | Not addressed. | Maintain geographically averaged rates for ILECs. | Maintain geographically averaged rates for ILECs. | Maintain geographically averaged rates for ILECs. | Not addressed. | All services but only downward flexibility for basic services. | Maintain geographically averaged rates for ILECs. | Not addressed. |
| PRICING PROCESS | | | | | | | | | | | | | |
| Cost Support for Advice Letters / Contracts | Eliminate. | Eliminate. | Eliminate. | Eliminate. | Eliminate. | Eliminate. | Eliminate. | Not addressed. | Not addressed. | Not addressed. | Eliminate. | Not addressed but continued imputation and floor requirements would imply cost support. | Not addressed |
| Advice letters | 1-day – \$ decrease and new services. 30-day \$ increase. 25-day cust notice for price increases. Terms and conditions remain subject to protest and suspension, for example, for failure to meet | 1-day – \$ decrease / increase. 25-day customer notice for price increase. Limited grounds for protest. | 1-day – \$ decrease / increase. 1-day – new services. 25-day customer notice for price increase. Limited grounds for protest. | 1-day – \$ decrease / increase. 25-day customer notice for price increases. Limited grounds for protest. | 1-day – \$ decrease / increase. 25-day customer notice for price increases. Limited grounds for protest. | Eliminate. | ILEC/CLEC parity. 1-day – \$ decrease. 30-day \$ increase. 25-day customer notice for price increases. | ILEC/CLEC parity. 1-day – \$ decrease. 30-day \$ increase. 25-day customer notice for price increases. | ILEC/CLEC parity. 1-day – \$ decrease. 30-day \$ increase. 25-day customer notice for price increases. | Not addressed. | 1-day – \$ decrease, new services and bundles. 30-day \$ increase. 25-day cust notice for price increases. | 1-day – \$ decrease. 30-day \$ increase. 30-day cust notice for \$ increase and new services. Need to address review of terms and conditions other than price | Not addressed |

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|--|---|---|---|---|---|---|---|--|---|----------------|---|---|--|
| | disclosure requirements for new and bundled services or for effective diminution of a "basic" price-capped service. See "Packages and Bundles." | | | | | | | | | | | | |
| Contracts [not pole attachments] | Effective on own terms. 15-day filing req. | Effective on own terms. 15-day filing reqmt. | Effective on own terms. 30-day filing reqmt. | Effective on own terms. No filing reqmt. | Effective on own terms. No filing reqmt. | Contracts for all customer services to replace tariffs. | Parity for timing of filing ILEC/CLEC req. Impute basic service rates into contracts that include basic services, standalone or bundled. | Parity for timing of filing ILEC/CLEC req. Impute basic service rates into contracts. | Parity for timing of filing ILEC/CLEC req. Impute tariffed service rates into contracts. | Not addressed. | Effective on own terms. 15-day filing reqmt. | Not permitted for Basket 1, 2 or 3 products. | Not addressed. |
| Grandfathering and/or Withdrawal of service | Not permitted for any price capped/ price-regulated service. For other "non-basic" services, defer this issue to Phase 2. | 1-day advice letter. 25-day customer notice. Res/Bus Access lines excluded from 1-day advice letter proposal. | Not addressed. | 1-day advice letter period for grandfathering; 25-day advice letter period for withdrawal. 25-day customer notice. Res/Bus Access lines excluded. | 1-day advice letter period for grandfathering; 25-day advice letter period for withdrawal. 25-day customer notice. Res/Bus Access lines excluded. | Not specifically addressed. | Not specifically addressed. | Not specifically addressed. | Not specifically addressed. | Not addressed. | Not addressed. | Need to ensure CPUC ability to determine impact on customers, public comment/protest. | Same as TURN plus there must be restrictions on the withdrawal of services that are relied on by people with disabilities. |

COMPARISON OF URF PROPOSALS

| ISSUE | ORA | SBC-CA | Verizon-CA | Citizens (Frontier) | SureWest | MCI ¹ | Cox | CCTA | Time Warner Telecom | CSBR/CS BA | DOD | TURN | DRA ² |
|----------------------------|--|---|--|--|--|--------------------------------|---|--|--|----------------|---|--|------------------|
| EARNINGS REGULATION | | | | | | | | | | | | | |
| Earnings Regulation | Eliminate earnings regulation but continue to report intrastate earnings according to Commission requirements. Subject to review and possible reversal in 3 years. | Eliminate earnings regulation; eliminate price cap and sharing mechanism. | Eliminate earnings regulation; eliminate price cap and sharing mechanism. | Eliminate earnings regulation; eliminate price cap and sharing mechanism. Price cap or similar filing should continue for Frontier to account for fluctuations in federal USF draws. | Eliminate earnings regulation; eliminate price cap and sharing mechanism. | Eliminate earnings regulation. | No longer required except to address rate increases for basic service. Eliminate revenue neutrality as a regulatory principle prior to change in rules. | No longer required except to address rate increases for basic service. Continue earnings reg until the presumption of revenue neutrality is eliminated. | Inflation adj for ILECs basic services; eliminate Productivity factor. No longer required except to address rate increases for basic service. Eliminate revenue neutrality as a regulatory principle prior to change in rules. | Not addressed. | Eliminate earnings regulation ILEC may seek increase in basic service revenue cap if revenue shortfall based on DEC. | Maintain price cap regulation; GDP-PI with possible productivity factor. | Not addressed |
| Rate Rebalancing | Oppose automatic rate increases for revenue neutrality. | Not addressed. | Maintain revenue neutrality, i.e., Commission-mandated rate reductions in price-regulated services should afford parties an opportunity to make offsetting rate changes to other price-regulated services. | Maintain revenue neutrality, i.e., Commission-mandated rate reductions in price-regulated services should afford parties an opportunity to make offsetting rate changes to other price-regulated services. | Maintain revenue neutrality, i.e., Commission-mandated rate reductions in price-regulated services should afford parties an opportunity to make offsetting rate changes to other price-regulated services. | None. | Oppose automatic rate increases for revenue neutrality. Prior to allowing ILECs to flexibly price services supported in some parts of the state, by HCF-B, rates should be rebalanced to eliminate the | Oppose - given that it presumes revenue neutrality. | Oppose. | Not addressed. | Within revenue cap, rate rebalancing permitted. | Oppose rate increases for revenue neutrality. | Not addressed |

COMPARISON OF URF PROPOSALS

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|---|---|--|--|--|--|--|---|--|--|----------------|--|--|---|
| | | | | | | | subsidy. If public policy prevents such rebalancing, pricing flexibility should not be permitted. | | | | | | |
| Imputation of Yellow Page revenue | No effect on current rates, no change to statute. Continue current reporting requirements. | Eliminate. | Eliminate. | Eliminate. | Eliminate. | No position. | Not addressed. | Contingent on the elimination of the presumption of revenue neutrality | Eliminate revenue neutrality as a regulatory principle prior to change in rules. | Not addressed. | Maintain only if ILEC claims basic service revenue short fall. | No effect on current rates, no change to statute. Continue current reporting requirements. | Not addressed. |
| Gain on Sale of Assets – allocations | Shareholders retain all gains and bear all losses. (Note: ORA’s position(s) on this and other issues are subject to change if ORA’s proposal is not adopted as a complete package.) | Shareholders retain all gains and bear all losses. | Shareholders retain all gains and bear all losses. | Shareholders retain all gains and bear all losses. | Shareholders retain all gains and bear all losses. | No position for ILECs. Exempt sale or transfer of assets by competitive telecom carriers from CPUC review & approval. | GOS of previous rate base assets should be treated depending on when asset acquired. | GOS of previous rate base assets should be treated depending on when asset acquired. | GOS of previous rate base assets should be treated depending on when asset acquired. | Not addressed. | GOS of previous rate base assets should be treated depending on when asset acquired. | GOS of previous rate base assets should be treated depending on when asset acquired. | Same as TURN |
| MONITORING/SERVICE QUALITY/ETC. | | | | | | | | | | | | | |
| Service Quality | Phase 2 issue. Continuation of ARMIS SQ monitoring data even if terminated by the FCC. | Uniform rules; SQ OIR or Phase 2. | Uniform rules; SQ OIR. | Uniform rules; SQ OIR. | Uniform rules; SQ OIR. | Eliminate service quality standards and rules unless they are necessary for | Defer to Service Quality OIR. | Defer to Service Quality OIR. | Defer to Service Quality OIR. | Not addressed. | Not addressed. | Phase 2 | Need enforceable requirements to ensure quality of services for people with disabilities. Principle |

COMPARISON OF URF PROPOSALS

| ISSUE | ORA | SBC-CA | Verizon-CA | Citizens (Frontier) | SureWest | MCI ¹ | Cox | CCTA | Time Warner Telecom | CSBR/CS BA | DOD | TURN | DRA ² |
|-------------------------|--|--|---|---|---|--|---|--|---|----------------|--|--|---|
| | | | | | | consumer protection of public health and safety. | | | | | | | established in Phase I. Details established in Phase II. |
| Accounting Rules | Phase 2 issue. Possibly USOA with CA overlays for Yellow Pages, inside wire, and affiliated transactions (as noted below.) | Eliminate all CA specific acct rules and defer to FCC acctg rules. | Conform financial reporting requirements to ARMIS. | Conform financial reporting requirements to ARMIS. | Conform financial reporting requirements to ARMIS. | Not specifically addressed. | Standardize CLEC/ILEC rules. | Standardize CLEC/ILEC rules; contingent upon prior elimination of presumption of revenue neutrality. | Standardize CLEC/ILEC rules. Eliminate revenue neutrality as a regulatory principle and reform CHCF-B prior to change in acctg rules. | Not addressed. | Conform reporting requirements to ARMIS. | Phase 2 issue. | Not addressed |
| Monitoring | Phase 2 issue. Streamline; replace many with ARMIS reports with CA overlays; additional reporting to monitor competition and related pricing effects; service quality; and availability of & subscribership rates for advanced services. | Phase 1 – Eliminate co-specific reports. Adopt principle of consistent requirements across carriers. Phase 2 – Any proposals for reports should show benefits outweighs cost, new reports must contain a sunset provision. | Monitoring reports should be consistent with URF goals. Eliminate NRF reports. Streamline and replace largely by ARMIS reports. | Phase 1 – Eliminate all Commission mandated NRF monitoring reports. Phase 2 – identify specific reports that are appropriate to URF. Reports should be consistent for all carriers. | Phase 1 – Eliminate all Commission mandated NRF monitoring reports. Phase 2 – identify specific reports that are appropriate to URF. Reports should be consistent for all carriers. | Eliminate . Do not adopt requirements similar to FCC ARMIS requirements. | Streamline; uniform reporting requirements. Workshop or other processes to workout details, e.g. Phase II of URF. | Streamline; uniform reporting requirements . Workshop or other processes to workout details. | Streamline; uniform reporting requirements . Workshop or other processes to workout details. | Not addressed. | Conform reporting requirements to ARMIS. | Phase 2 issue. Streamline; perhaps replace many with ARMIS reports; additional reporting to monitor competition, service availability and service quality. | Need reporting and monitoring on disability-related service quality (including customer satisfaction). Principle established in Phase I. Details established in Phase II. |
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COMPARISON OF URF PROPOSALS

| ISSUE | ORA | SBC-CA | Verizon-CA | Citizens (Frontier) | SureWest | MCI ¹ | Cox | CCTA | Time Warner Telecom | CSBR/CS BA | DOD | TURN | DRA ² |
|---|---|---|--|---|---|-----------------------------|---|--|---|----------------|-----------------------------|--|------------------|
| Audit Requirements | Phase 2 issue. | Phase 2 issue. Streamline; consistent requirements across carriers. | Streamline. | Phase 2 issue; Streamline; consistent requirements across carriers. | Phase 2 issue; Streamline; consistent requirements across carriers. | Eliminate . | Streamline; consistent req across carriers. Workshop or other processes to workout details. | Streamline; consistent req across carriers. Workshop or other processes to workout details. Contingent on prior elimination of presumption of revenue neutrality. | Streamline; consistent req across carriers. Workshop or other processes to workout details. Eliminate revenue neutrality as a regulatory principle prior to change in rules. | Not addressed. | Not addressed | Phase 2. Need more audits to ensure just and reasonable rates and avoid cross-subsidy including broadband cost analyses. | Same as TURN |
| Affiliate Transactions | Phase 2 issue. | Eliminate all co-specific rules; defer to FCC rules. | Eliminate reporting requirements, conform to FCC rules. | Eliminate reporting requirements , conform to FCC rules. | Eliminate reporting requirements , conform to FCC rules. | Not specifically addressed. | Eliminate rules for ILECs if price floors kept for basic service; No rules for CLECS. | Eliminate if price floors kept for basic service. Contingent upon prior elimination of presumption of revenue neutrality. | Eliminate if price floors kept for ILEC services; and presumption of revenue neutrality is eliminated. No rules for CLECS. | Not addressed. | Not specifically addressed. | Phase 2 issue. | Not addressed. |
| Customer disclosure requirements *CBOR – Consumer Bill of Rights proceeding | Uniformity across carriers to the extent possible. Phase 2 issue, e.g., adopt disclosure requirements as described under “Packages and Bundles.” | Phase 1, adopt a policy that customer disclosure reqmts should be adopted uniformly to the extent reasonably feasible and the specifics addressed in the CBOR.* Any un-uniform disclosure | Adopt a policy that any customer disclosure requirements should be adopted uniformly to the extent reasonably feasible and the specifics addressed in the CBOR | Agree that any customer disclosure requirements should be adopted uniformly to the extent reasonably feasible and the specifics addressed in the CBOR | Agree that any customer disclosure requirements should be adopted uniformly to the extent reasonably feasible and the specifics addressed in the CBOR | Not addressed. | Not addressed. | Not addressed. | Not addressed. | Not addressed. | Not addressed. | Phase 2 issue. | Not addressed. |

COMPARISON OF URF PROPOSALS

| ISSUE | ORA | SBC-CA | Verizon-CA | Citizens (Frontier) | SureWest | MCI ¹ | Cox | CCTA | Time Warner Telecom | CSBR/CS BA | DOD | TURN | DRA ² |
|---|---|--|--|---|--|------------------|-----|------|---------------------|------------|--------------------|------|------------------|
| | | reqmts remaining after CBOR should be considered for elimination in Phase 2. | | | | | | | | | | | |
| Timing and Scope of next review, if any. | Review within 3 years to determine whether adopted framework is achieving its stated goals, or sooner if problems are detected. Mechanism for prompt remedial action in case monitoring program indicates framework's failure (i.e., adopt "fail-safe" mechanism(s), such as restoration of price caps.) Expedited resolution of complaints (e.g., a complaint by a competitor or customer is resolved in 90 days or plaintiff's request for relief is automatically granted absent | No automatic review needs to be scheduled. The CPUC retains authority to initiate a review of any aspect of the adopted regulatory framework at any time it deems it appropriate to do so. | All remaining transitional constraints on pricing flexibility (e.g., price caps for "basic" services and statewide retail tariffed rate uniformity) should be automatically eliminated in 3 years. | Any pricing constraints that remain at the conclusion of Phase I should be automatically removed by June 1, 2007, or by 2 years from the conclusion of Phase I of the proceeding at the latest. Frontier acknowledges the CPUC's existing authority to initiate a review of any aspect of the adopted regulatory framework at any time it deems it appropriate to do so. | Any pricing constraints that remain at the conclusion of Phase I should be automatically removed by June 1, 2007, or by 2 years from the conclusion of Phase I of the proceeding at the latest. The CPUC retains authority to initiate a review of any aspect of the adopted regulatory framework at any time it deems it appropriate to do so. | | | | | | Review in 3 years. | | Same as TURN |

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|------------------------|---|--|---|--|--|------------------|--|------|--|------------|---|--|--|
| | good cause for delay.) | | | | | | | | | | | | |
| POLICY ISSUES | | | | | | | | | | | | | |
| Competitive assessment | The current level of competition does not justify broad elimination of price caps at this time; however, ORA is willing to experiment with greater regulatory flexibility for less-essential services, subject to the other protections identified in ORA's proposal. | The telecommunications marketplace has multiple providers (traditional wireline companies, wireless companies, cable companies, VoIP providers, wireless internet providers, and other intermodal competitors) offering multiple services over multiple technologies. Consumer preference and choice drive pricing and packaging of services, and no communications provider has the ability to sustain prices above competitive levels. | Today's broad-based, dynamic communications environment promotes product diversity and disciplines competitors' prices. Competitors include both intra-modal (wireline) providers, and inter-modal (wireless, cable, and VoIP) providers. Competitive analyses that consider only a single mode of competition and fail to accommodate or control for market dynamics (such as the effects of technological change and regulatory obligations) are fundamentally flawed, incomplete, and provide no | Both the California telecommunications market generally – and Frontier's service territory specifically – demonstrate significant competition between a variety of intermodal and intramodal competitors. Dramatic changes and competitive developments in the telecommunications landscape have rendered the NRF structure obsolete, and justify the creation of a Uniform Regulatory Framework, which should incorporate broad pricing flexibility and | The competitive landscape for the four NRF ILECs has changed dramatically, as numerous competitive opportunities exist for customers from a variety of intermodal and intramodal telecommunications services. Dramatic changes and competitive developments in the telecommunications landscape have rendered the NRF structure obsolete, and justify the creation of a Uniform Regulatory Framework, which should incorporate broad pricing flexibility and | | Drastic disagreement among the parties on current competitive levels and potential for changes; also drastic disagreement on what services are complements to or substitutes for each other; Full assessment of market dominance needs to be done by Commission before reducing ILEC regulation. | | Drastic disagreement among the parties on current competitive levels and potential for changes; also drastic disagreement on what services are complements to or substitutes for each other; Full assessment of market dominance needs to be done by Commission before reducing ILEC regulation. | | ILECs retain market power in mass market (i.e. residence and small business). ILECs lack market power in enterprise market. | ILECs have significant market power. Competition insufficient to justify extensive price deregulation. | ILECs seem to have considerable market-power. As it stands, the Commission lacks sufficient information to gauge competitive conditions. |

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|-------|-----|--------|--|---|---|------------------|-----|------|---------------------|------------|-----|------|------------------|
| | | | useful information about market power. | significant regulatory streamlining. Any measurement /assessment of market should include impacts of all modes of service. | significant regulatory streamlining. Any measurement /assessment of market should include impacts of all modes of service. | | | | | | | | |

COMPARISON OF URF PROPOSALS

¹ MCI's positions initially were expressed in the context of addressing a "uniform" regulatory framework, as contemplated by the Commission's OIR, and were not intended to be viewed solely in the context of a re-examination of regulations applicable only to incumbent local exchange carriers (ILECs). MCI's comments also emphasized that access charge and universal service reform are top priorities (and affect different companies in different ways) and need to be addressed prior to ILEC deregulation. The matrix also does not reflect other topics, in addition to the economic/pricing issues contained in the matrix, that MCI addressed in its comments relating to regulations that create barriers to entry or deter deployment of advanced telecommunications facilities. In particular, MCI recommended that the current certification process be replaced with a simple registration process, that the CEQ review process be eliminated or drastically reformed, and that right-of-way approval processes be reformed and streamlined.

² DRA has expressed various concerns and proposals in this proceeding about access to telecommunications services for people with disabilities. Some of those concerns and proposals cut across multiple issues that are covered in this matrix, however they do not all fit perfectly within the issues covered by this matrix. Specifically, DRA proposes the following:

- (1) **Definition of Basic Service: Phase I:** The Commission recognizes that certain services that may not be considered "basic" or "essential" to Californians, generally, may be basic or essential to people with disabilities, that pricing restrictions should remain for such services as they are utilized by relevant people with disabilities, and that the parties will work in Phase II to determine what services are basic or essential to people with disabilities and the best way to make sure that those services remain affordable to the relevant people with disabilities. **Phase II:** Establish details.
- (2) **Service Quality/Monitoring: Phase I:** The Commission recognizes that providers must provide high quality disability-related services to people with disabilities and that some requirements must be in place. The Commission also finds that providers must monitor and report on quality of services provided to people with disabilities. **Phase II:** Details of service-quality requirements and reporting/monitoring requirements are established.
- (3) **Information: Phase I:** The Commission recognizes that providers should provide information to people with disabilities about the services and products they provide for their benefit. **Phase II:** Establish details
- (4) **Maintenance of Programs: Phase I:** Programs that are in place that are designed to enhance access to telecommunications services for people with disabilities are maintained and the Commission recognizes that it would be beneficial to extend those programs to additional services.
- (5) **Website accessibility: Phase I:** The Commission finds that providers' web sites should be accessible and user-friendly. **Phase II:** Establish details.
- (6) **Bundles Services Savings: Phase I:** The Commission finds that where services are offered in bundles and one or more of the items in a bundle are not accessible to a person with a disability, that person should be able to receive the savings associated with the bundles services without having to buy the particular inaccessible service(s). **Phase II:** Establish details.
- (7) **Withdrawal of Services: Phase I:** The Commission finds that there must be some restrictions on the withdrawal of services that are necessary for people with disabilities. **Phase II:** Establish details.