

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

**Communications Division  
Program Management & Implementation  
Branch**

**RESOLUTION T-17120  
November 1, 2007**

**R E S O L U T I O N**

**RESOLUTION T- 17120: AT&T California (U-1001-C). In accordance with Decision 01-12-021 Ordering Paragraph 6, this resolution addresses the monthly and annual ARMIS data on initial and repeat out-of-service repair intervals for residential customers for 2006.**

**By Advice Letter No. 30117, filed on May 16, 2007**

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**I. Summary**

This resolution directs AT&T California (“AT&T”) to pay a penalty of \$300,000 per month for three months (a total of \$900,000) for non-compliance with the initial out of service (“IOOS”) standard for year 2006.

**II. Background of Past AT&T Out of Service Filings**

The Commission opened proceeding C.00-11-018 to examine whether Pacific Bell’s service quality had deteriorated as a result of a complaint filed by the Office of Ratepayer Advocates (“ORA,” predecessor of Division of Ratepayer Advocates “DRA”.) The Commission subsequently issued D.01-12-021 to establish annual standards for AT&T’s average IOOS and repeat OOS (“ROOS”) intervals. The standards are 29.3 for IOOS and 39.4 for ROOS. In D.01-12-021, the Commission ordered Pacific Bell, now AT&T,<sup>1</sup> to file an annual advice letter on its performance in repairing residential outages. If AT&T failed to meet the set standards, it could be penalized up to \$600,000 for each month it was out of compliance.<sup>2</sup> The standards set, which were elsewhere referred to as out-of-service repair intervals, are an average measure of the amount of time a given outage lasts before a repair is made.

AT&T met the OOS standards in years 2003 and 2004.<sup>3</sup> For year 2005 (AL 27928), the Commission fined AT&T \$900,000 for three months of failing the IOOS standard.

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<sup>1</sup> Through a series of mergers, Pacific Bell changed its name first to SBC and then to AT&T.

<sup>2</sup> D.01-12-021, Ordering Paragraph 7.

<sup>3</sup> AT&T filed AL 23488 containing its IOOS/ROOS for 2002 on January 17, 2003; AL 24538 containing those data for 2003 on January 20, 2004; and AL 26097 containing those data for 2004 on January 20, 2005. AT&T filed AL 27928 on January 20, 2006 reporting its year 2005 OOS results.

### III. AT&T'S Current OOS Filing

By Advice Letter (AL) 30117, AT&T submitted its monthly and annual ARMIS data on IOOS and ROOS repair intervals for residential customers for year 2006 pursuant to Decision 01-12-021 ("D.01-12-021") and Decision 07-04-019 ("D.07-04-019.")

AT&T submitted an annual average IOOS and repeat out of service ROOS of 54.8 and 57.3 hours, both exceeding the IOOS and ROOS standards of 29.3 and 39.4 hours set in D.01-12-021. AT&T made adjustments to its IOOS and ROOS: (1) by excluding all months in which a state of emergency was declared – January through April, (2) further excluding May and June due to the effect of weather-related damage from preceding months, and (3) removing the impact of the delaying effects of Customer Requested Appointments ("CRAs"). After these adjustments, AT&T reported an annual average of 27.4 and 36.2<sup>4</sup> hours of IOOS and ROOS, and stated that it met the adopted standards. The following table provides the 2006 annual results of OOS on an unadjusted and adjusted (for weather and CRA) basis:

	Initial OOS Interval (hrs)	Repeat OOS Interval (hrs)
D.01-12-021 Standard	<b>29.3</b>	<b>39.4</b>
Unadjusted Annual Results	54.8	57.3
Adjusted for Weather Catastrophes and CRA Effect	32.7	<b>36.2</b>
Adjusted for Weather Catastrophes and CRA Effect plus catastrophic event carryover effect	<b>27.4</b>	

### IV. Notice and Protests

AT&T first filed AL 29927 reporting its OOS performance for year 2006 to request a one-day effective treatment. The one-day effective date process was adopted in the Commission's Uniform Regulatory Framework (URF) Proceeding (R.05-04-005) for certain types of AL filings. The Communications Division (CD) rejected that advice letter without prejudice pursuant to the CPUC D.05-01-032 advice letter rules because OOS is a service quality issue, and was specifically excluded from URF review. Hence, it did not meet the criteria for the one-day effective advice letter process adopted in D.06-08-030.

Subsequently, AT&T filed AL 30117 to report its OOS performance for 2006. In its advice letter, AT&T states that, in compliance with Section III. G. of General Order No. 96.A, it mailed a copy of AL 30117 to competing and adjacent utilities and/or other utilities, and interested parties, as requested. In addition, AT&T states that it sent an e-mail copy of the advice letter to parties as requested. A notice of this advice letter was published in the Commission's Daily Calendar on June 1, 2007.

A timely protest to the AL was filed by the Division of Ratepayers Advocates (DRA) on June 5, 2007. AT&T responded to DRA's protest on June 12, 2007.

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<sup>4</sup> ROOS did not adjust for exclusion of May and June.

## **V. Discussion and Analysis**

We will discuss each of AT&T's reasons for adjustments listed above and other issues raised by DRA and discovered by Communications Division ("CD") staff through the review of this advice letter.

### **1. An exemption should be granted for January, February, March, and April because States of Emergency were declared in those months**

Due to severe weather-related events that occurred in 2006, which resulted in declared states of emergency in January, February, March, and April, AT&T requests that these months be exempted from the derivation of its residential out-of-service penalties for 2006. Both Governor Schwarzenegger and President Bush declared states of emergency in 2006.

DRA reviewed the filing and in its protest did not oppose excluding the results of January and April, but opposes exclusion of February and March due to weather-related catastrophic events.<sup>5</sup> DRA stated that January was more appropriately considered a carryover month from December of 2005, which was a month in which a state of emergency was declared. DRA also urged the Commission to deny carryover month treatment for February and March. DRA asserted that statewide precipitation was only 75% normal in February and AT&T's OOS reports had decreased almost half of that in January. DRA noted that March should not be treated as a carryover month because weather conditions had improved, only over by a little more than half of the long-term average precipitation for Northern CA. DRA also noted that other California ILECs who were also impacted by the same severe weather conditions were able to repair out of service problems at least twice as rapidly as AT&T during the same period in 2006. Furthermore, the disaster declaration of March did not happen until March 29. Therefore, DRA recommends denying exemption of February and March.<sup>6</sup>

D.01-12-021 permits AT&T to adjust and exclude certain months in the calculation of annual repair intervals. The repair intervals for the remaining months are then compared against the preset standards to determine if penalties are warranted.<sup>7</sup> The Decision defines a catastrophic event as "any event in AT&T's service area for which there is a declaration of a state of emergency, duly issued under federal or state law."<sup>8</sup> A widespread service outage is defined as "any outage affecting at least 3% of AT&T's residential customers in the state."<sup>9</sup>

In its workpapers and response to the CD staff's data request of May 8, 2007, AT&T provided information on the dates that the states of emergency that occurred, the authority that made the declaration, and the counties impacted. The table below summarizes the data on the states of emergency.

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<sup>5</sup> DRA's Protest to AT&T AL 30117, pp. 3-4.

<sup>6</sup> DRA's Protest to AT&T AL 30117, pp. 3-4.

<sup>7</sup> "If a catastrophic event or widespread service outage occurs in one or more months of the year, as part of its annual Advice Letter filing, Pacific shall provide both the -unadjusted ARMIS average for the month and year, along with adjusted figures. Pacific shall provide supporting information as to why the month should be excluded for purposes of calculating penalties and work papers that show the date(s) of the catastrophic event and how the adjusted figure was calculated." Ordering Paragraph 9 of D.01-12-021.

<sup>8</sup> D.01-12-021 footnote 38.

<sup>9</sup> D.01-12-021 footnote 39.

<b>States of Emergency</b>				
<b>Date Declared</b>	<b>Start Date</b>	<b>End Date</b>	<b>Issued By</b>	<b>No. of Affected Counties</b>
February 23, 2006	December 17, 2005		President Bush	4
April 10, 2006	April 4, 2006		Governor Schwarzenegger	7
April 10, 2006	December 19, 2005		Governor Schwarzenegger	9
May 10, 2006	December 19, 2005	April 16, 2006	Governor Schwarzenegger	40
May 10, 2006	March 29, 2006		Governor Schwarzenegger	20
June 5, 2006	April 29, 2006		Governor Schwarzenegger	1
June 5/6, 2006	March 29, 2006	April 16, 2006	President Bush	17

Based on data submitted by AT&T, we believe that AT&T should be granted an exemption from penalties in the months of January, February, March, and April, 2006 for the IOOS/ROOS standard due to the declared states of emergency. If the four months are excluded from the annual calculations, AT&T will have met the annual ROOS standard but not the IOOS standard for 2006 and would still be subject to penalties in the amount of \$300,000 each for six (6) months under IOOS standard. See Attachment 1.

**2. Initial Out-of-Service intervals increased because AT&T allowed customers to make Customer Requested Appointments**

In its advice letter, AT&T notes:

“In addition to the severe and prolonged storms of 2006, AT&T California’s 2006 OOS results were significantly affected by the number of CRAs, which allow a customer to select an appointment later than the first repair date offered by AT&T California. For example, for the last five months of 2006, trouble tickets with CRAs added nearly 5 hours to the IOOS result. This amounted to an increase of almost 70% over the annual IOOS result in 2002 (2.9 hours), when the 4-hour appointment began to be proactively offered to customers in compliance with D.01-12-021. For the same five months of 2006, the trouble tickets with CRAs also added over 2 hours to the ROOS result.”<sup>10</sup>

We find that it is reasonable to exclude the effects of CRAs from the OOS standard because CRAs were mandated by D.01-12-021 and they serve the customers’ interests. Resolution T-17024b also allowed AT&T to exclude CRAs from the OOS calculations. After adjusting for exclusion of January, February, March, April and CRA effects, AT&T met the ROOS standard.

<sup>10</sup> AT&T AL 30117 pg. 4.

However, the annual average IOOS still failed to meet the IOOS standard. The annual average exceeds the standard by 3.4 hours. See Attachment 2.

### **3. May Should Be Exempted But Not June**

AT&T requested that the Commission grant an exemption for the carryover months of May and June following the first four months of the year that were declared states of emergencies as recognized by Resolution 17024b.<sup>11</sup>

DRA argued that AT&T not be allowed to count May and June as carry over months. DRA noted that June was a very dry month with only 50% of the average rainfall, and AT&T had fewer OOS reports in June than any month of 2006.<sup>12</sup>

We agree with AT&T that May should be treated as a carryover month. April was one of the months with the most severe weather condition in 2006, and May continued to be a wet month with rainfall exceeding the average by almost 50%. AT&T recorded relatively high installation and repair (“I&R”) labor hours presumably to take care of substantial outage trouble tickets. Therefore, it is reasonable to consider May a carry over month from April.

On the other hand, June should not be counted as a carry over since the weather was very dry as shown below:

First Six Month Rainfall In Year 2006

	Jan	Feb	Mar	Apr	May	Jun
<b>Rainfall<sup>13</sup></b>	122%	79%	207%	240%	145%	<b>47.5%</b>

In addition, AT&T’s trouble reports that were closed each month indicate that the number of closed trouble reports started to decline in April, and the number of residential outage trouble reports closed in June is the least in year 2006. Similarly, AT&T’s June deployment of installation and repair labor dropped substantially and is among the lowest of any month in 2006. The specific information regarding trouble reports is identified in appendix A to this Resolution and the installation and repair time is contained in Appendix B, both contain proprietary information.

Based on the above information, we conclude that June should not be exempted for AT&T. After excluding May but including June into OOS calculations, AT&T failed three months in its IOOS performance for year 2006. See Attachment 3.

### **4. Other Issues Raised by DRA**

#### **a. Concerns with Sufficient Number of Employees to Adequately Address Out of Service Problems**

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<sup>11</sup> AT&T AL 30117 p. 4.

<sup>12</sup> Protest of DRA to AT&T’s AL 30117, p. 5. (June 5, 2007.)

<sup>13</sup> AT&T’s May 22, 2007 presentation to CD, p.7.

DRA observed that other carriers operating in the impacted counties in Northern California were subject to the same weather catastrophes but were able to restore out of service conditions quickly, or at least twice as fast than that of AT&T.<sup>14</sup> DRA argued that AT&T's poor OOS in year 2006 was largely caused by an inadequate workforce to repair services in a timely manner. DRA pointed to AT&T's many hours spent on installation and that their repair service was cut substantially between 2005 and 2006,<sup>15</sup> suspecting that this might be a result of the SBC and AT&T merger.<sup>16</sup>

AT&T refuted DRA's argument that AT&T had inadequate laborers for installation and repair. AT&T pointed out that the data it provided to DRA contained duplicated labor hours in earlier years, and when the duplication is removed, the number of labor hour reduction from 2005 to 2006 was much less than what was shown by DRA.<sup>17</sup>

While we are not persuaded by DRA that AT&T imprudently cut down its employees, we found the substantial number of very long out of service intervals troubling. Tens of thousand residential customers' outage services were not restored for more than 240 hours or ten (10) days. Refer to Appendix C to this Resolution for the specific data.<sup>18</sup> This is a public safety hazard issue because when customers' phones are out of service, access to emergency services is jeopardized. Public safety agencies substantially rely upon basic exchange services to provide public safety services; and consumers rely on properly working phones to contact public safety answering points. Therefore, for the outages over ten (10) days, AT&T shall include in future OOS filings an attachment discussing the reasons for the lengthy outages and the corrective measures that it has taken to mitigate them.

**b. AT&T Has Much Longer OOS Intervals Compared to Other ILECs Who Are Similarly Located in Areas Declared of Emergency State**

DRA protested that AT&T's average time to restore out of service trouble reports was too long compared to other ILECs impacted by the same severe weather conditions.<sup>19</sup> DRA provided the following table to substantiate its point.

**Average Time to Restore Out-of-Service Trouble in Hours<sup>20</sup>**

AT&T CA	53.7
Verizon West Coast Inc.	17.2
Citizens CA	22.4
Citizens Telecom of Tuolumne	18.1
Citizens Telecom of the Golden State	24.7

AT&T argued that DRA was inaccurate to state that each of the carriers' territories is "primarily or entirely within the impacted areas," and pointed to Verizon as an example. We note that

<sup>14</sup> Protest of DRA to AT&T's AL 30117, p. 3. (June 5, 2007.)

<sup>15</sup> AT&T alleged the installation and labor hours proprietary.

<sup>16</sup> Protest of DRA to AT&T's AL 30117, p. 4. (June 5, 2007.)

<sup>17</sup> AT&T reply to DRA Protest, p 9. (June 12, 2007.)

<sup>18</sup> AT&T response to DRA data request No. 1-5, DRA 521\_IOOS detail.

<sup>19</sup> Protest of DRA to AT&T's AL 30117, p. 3. (June 5, 2007.)

<sup>20</sup> Protest of DRA to AT&T's AL 30117, p. 4. (June 5, 2007.)

DRA was referring to Verizon West Coast, which is a small ILEC also regulated by us, and its service area is among the declared emergency state areas.

In general, we agree with AT&T that there is insufficient information provided by DRA regarding Verizon and Citizen to make a meaningful comparison. However, the carriers are supposed to follow the same FCC reporting guidelines and definitions when they report their OOS data to the FCC in their ARMIS reports, hence, we are troubled to see that AT&T's OOS duration is substantially longer than those of the three small ILECs and Citizen CA.<sup>21</sup> This raises the same issue whether AT&T adequately employed a work force to promptly restore customers' services or not. We urge AT&T to undertake necessary efforts to reduce hours to restore service to be more in line with other carriers.

**c. AT&T Submitted A Few Versions of Trouble Report Information that Causes Confusion**

The CPUC established the OOS standards in its year 2001 decision relying on the ARMIS 43-05 trouble report and outage duration that Pacific Bell submitted to FCC annually. AT&T also submits monthly trouble report data to CPUC quarterly as part of the Ameritech and SBC merger conditions (MCOB). In responding to DRA's protest, AT&T further submitted monthly trouble report tickets. CD staff reviewed AT&T's trouble report tickets but at the beginning was unable to reconcile the differences among the various sources of the trouble report data as shown in Appendix D.

It is also unclear why the trouble reports filed in ARMIS were declining over time while the data AT&T used to refute DRA showed an increasing trend of trouble reports over the last five years. See Appendix E.

After a number of follow up inquiries by CD staff, AT&T explained that the MCOT data includes CPE equipment and inside wiring while ARMIS does not. In addition, AT&T explained that the data it submitted to staff data request inquiry is the complete set of trouble reports, which include not only OOS trouble reports but also all other trouble reports such as noise, static, etc.<sup>22</sup> Moreover, at one meeting, AT&T told CD staff that the year 2006 ARMIS OOS information AT&T compiled excluded DSL-related trouble reports that had not been excluded in the past because the old system was not as sophisticated as the current system.<sup>23</sup> However, after CD staff further inquired about the change in procedures for compiling ARMIS data, AT&T stated that DSL-related trouble reports were never included in the ARMIS reports since the Commission established OOS standards in year 2001.<sup>24</sup>

On September 28, 2007, AT&T provided further explanation that the drop in trouble tickets from 2005 to 2006 filed with FCC ARMIS was due to several factors, including AT&T replacing its outage report systems, consolidation of some codes, as well as excluding trouble tickets associated with trouble tickets caused from customer end, primarily relating to Customer Provided Equipment (CPE) Maintenance Plans.

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<sup>21</sup> Surewest does not submit ARMIS reports with FCC, therefore, comparison data not available.

<sup>22</sup> In attachment 4, CD shows the different sets of trouble reports reflected in the different sources and the reasons why such discrepancies might have occurred.

<sup>23</sup> AT&T revealed this fact when met with CD staff on August 22, 2007.

<sup>24</sup> September 19, 2007 CD staff had a conference call with AT&T.

The explanation provided by AT&T addresses the data differences. However, it appears to be inconsistent with the carrier's prior representation that the methodology used for compiling the ARMIS information in AL 30117 has not been changed since the issuance of D.01-12-021.<sup>25</sup> In its future OOS AL filing, AT&T shall provide a set of OOS data that was compiled in the manner allowing accurate comparison to the OOS standards established by D.01-12-021.

## **VI. Conclusions**

After reviewing AT&T's filing and the issues raised by the DRA in its protest, we adopt the following positions:

- Grant AT&T's request for penalty exemption for repeat out-of-service standard for the entire year of 2006 due to declared states of emergency.
- Grant AT&T's request for penalty exemption for initial repair out-of-service intervals due to declared states of emergency for the affected period (i.e., January, February, March, and April, 2006).
- Grant AT&T's request for penalty exemption for the month of May during which the service problems arising from the state of emergency continued.
- Grant AT&T's request for penalty waiver for the effects of Customer Requested Appointments (CRAs) on repair out-of-service intervals.
- Deny DRA's request to include February, March, and May for OOS calculation.
- Deny AT&T's request for excluding June for IOOS calculation as AT&T's June employment of labor hours of installation and repair, and the number of residential outage report tickets closed were among the lowest in 2006.
- Order AT&T to pay a penalty of \$300,000 per month for June, July, and December, for a total of \$900,000 for non-compliance with initial out-of-service repair interval standards.
- Order AT&T in its future AL filings to identify the reasons causing the certain outage repairs exceeding ten days, and demonstrate corrective measures that it takes to mitigate future long outage intervals.
- Order AT&T to file OOS data that can be compared to the ARMIS data compiled and used by the Commission in establishing the standards in D.01-12-021.

## **VII. AT&T Proprietary Information**

AT&T submitted a number of records in response to DRA's protest and CD's data requests. AT&T designated some of the records as "proprietary and confidential" and stated that the records were submitted pursuant to Public Utilities Code Section 583 and General Order ("GO") 66-C. We have treated such documents as such and have redacted the data accordingly. We, however, make no such judgment that the data is proprietary and confidential.

In the event of a challenge, we would require AT&T to demonstrate why the public interest in disclosure is outweighed by the need to keep the records confidential.

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<sup>25</sup> AL30117, p.7.

## **VIII. Comments and Replies**

Public Utilities Code Section 311(g) (1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote on the Commission. Section 311 (g) (2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

## **IX. Findings**

1. AT&T informed the Commission that it did not meet IOOS and ROOS standards in 2006.
2. AT&T requested exemption on the basis of declared states of emergency, for IOOS and ROOS during the months of January, February, March, and April.
3. AT&T requested exclusion of CRA for IOOS and ROOS for months of May through December.
4. AT&T requested exemption on the basis of incurred excessive storm-related operations for IOOS for months of May and June.
5. DRA filed timely protest on June 5, 2007.
6. AT&T responded to DRA's protest on June 12, 2007.
7. AT&T's supporting documents are sufficient to accept AT&T's request for a penalty waiver on the basis of states of emergencies for January, February, March, and April for IOOS and ROOS.
8. AT&T's supporting documents are sufficient to accept AT&T's adjustment of OOS for customer requested appointments (CRAs).
9. AT&T should be granted an exemption for the month of May due to the continued effects of declared states of emergency in the preceding months.
10. June 2006 was relatively dry; its rainfall was only about 50% of the historical average.
11. AT&T's June deployment of installation and repair labor is among the lowest months for any month in 2006.
12. The number of trouble reports closed in June is smaller compared to months that did not have adjustments for catastrophic events for year 2006.
13. AT&T's average time to restore out of service trouble reports was much longer compared to other CA ILECs impacted by the same severe weather conditions.

**IT IS ORDERED THAT:**

1. AT&T's request for penalty exemption for IOOS due to declared states of emergency for the affected period (i.e., January, February, March, and April, 2006) is granted.
2. AT&T's request for a penalty exemption for IOOS due to the continued effects of declared states of emergency in May is granted.
3. AT&T's request for a penalty waiver for claimed effects of CRA on IOOS and ROOS is granted.
4. AT&T's request for treating June as a carryover month is denied.
5. In accordance with D.01-12-021, AT&T shall pay a penalty of \$300,000 per month for three months for a total of \$900,000 for non-compliance with the IOOS standard.
6. AT&T's request for penalty exemption for ROOS for the entire year of 2005 is granted.
7. AT&T, in its future AL filings, is ordered to identify the reasons causing the long delays of repairs which exceeds ten days, and provide corrective measures that it takes to mitigate future long outage intervals.
8. AT&T shall provide Commission staff a set of OOS data that was compiled in the manner allowing accurate comparison to the OOS standards established by D.01-12-021.

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on November 1, 2007. The following Commissioners approved it:

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Paul Clanon  
Executive Director

**Attachment 1**

Repair Intervals Adjusted for Catastrophic Events and Customer Requested Appointments (Hours)		
2005	Initial Repair (IOOS) Standard = <b>29.3</b>	Repeat Repair (ROOS) Standard = <b>39.4</b>
January	Exclude	Exclude
February	Exclude	Exclude
March	Exclude	Exclude
April	Exclude	Exclude
May	<b>48.6</b>	50.4
June	<b>47.5</b>	47.6
July	<b>42.5</b>	43.5
August	<b>29.7</b>	31.1
September	26.7	28.2
October	27.0	28.1
November	<b>31.8</b>	33.0
December	<b>34.6</b>	37.4
Annual	<b>35.7</b>	<b>37.7</b>

**Attachment 2**

Repair Intervals Adjusted for Catastrophic Events and Customer Requested Appointments (Hours)		
2005	Initial Repair (IOOS) Standard = <b>29.3</b>	Repeat Repair (ROOS) Standard = <b>39.4</b>
January	Exclude	Exclude
February	Exclude	Exclude
March	Exclude	Exclude
April	Exclude	Exclude
May	<b>48.6</b>	50.3
June	<b>45.9</b>	46.4
July	<b>39.5</b>	41.5
August	24.6	29.3
September	21.6	26.2
October	21.9	26.1
November	27.5	30.8
December	<b>29.6</b>	34.6
Annual	<b>32.7</b>	<b>36.2</b>

**Attachment 3**

Repair Intervals Adjusted for Catastrophic Events and Customer Requested Appointments (Hours)		
2005	Initial Repair (IOOS) Standard = <b>29.3</b>	Repeat Repair (ROOS) Standard = <b>39.4</b>
January	Exclude	Exclude
February	Exclude	Exclude
March	Exclude	Exclude
April	Exclude	Exclude
May	Exclude	50.4
June	<b>45.9</b>	47.6
July	<b>42.5</b>	43.5
August	24.6	31.1
September	21.6	28.2
October	21.9	28.1
November	27.5	33.0
December	<b>29.6</b>	37.4
Annual	<b>29.9</b>	<b>37.7</b>

**Appendix A**

**Redacted**

## **Appendix B**

**Redacted**

**Appendix C**

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**Appendix D**

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**Appendix E**

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[T17120 Notice letter for draft resolution addresses AT&T California's initial and repeat out-of-service repair intervals](#)