

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



FILED

03/17/23

01:54 PM

I2210007

Order Instituting Investigation into the Operations
and Practices of TC Telephone to Determine
Whether Respondents Violated the Laws, Rules, and
Regulations of this State Governing the California
Universal LifeLine Program.

I. 22-10-007

**RESPONSE OF TC TELEPHONE
TO ADMINISTRATIVE LAW JUDGE DIRECTIVE
TO SUBMIT SUPPLEMENTAL DOCUMENTS
FOR EVIDENTIARY RECORD**

iCommLaw
Anita Taff-Rice
1547 Palos Verdes, #298
Walnut Creek, CA 94597
Phone: (415) 699-7885
Fax: (925) 274-0988
Email: anita@icommlaw.com
Counsel for TC Telephone

March 17, 2023

Pursuant to direction of Administrative Law Judge Mason during the pre-hearing conference (“PHC”) on February 28, 2023, TC Telephone respectfully submits a set of documents to supplement the evidentiary record set forth in its Response to the Order to Show Cause and PHC Statement in the above-captioned proceeding.

During the PHC, Judge Mason inquired whether TC Telephone had written communications with Commission staff after they indicated in mid-2019 that their prior instructions permitting reimbursement requests for lost revenues on a per-minute basis may have been incorrect. TC Telephone conducted a diligent search and found additional email correspondence that set forth interim discussions with staff in the Communications Division and the Legal Division regarding the propriety of seeking per-minute reimbursements for lost revenues.¹ Those emails are included in the attached production.

These emails in this production highlight the level of uncertainty that pervaded staff’s communications with TC Telephone during mid-2019 and into 2020. TC Telephone notes that these communications with staff provide context for the efforts undertaken by staff and TC Telephone to clarify how TC Telephone should calculate reimbursement requests for lost revenue for Lifeline service. TC Telephone had multiple email and phone conversations, and one in-person meeting² to attempt to get clarification on the structure and scope of reimbursements for lost revenues.³ TC Telephone even escalated the issue to the Commission’s Legal Division, but without success.⁴ Eventually, TC Telephone and staff (including the Legal

¹ The emails produced are representative of the communications various staff members had with TC Telephone in mid-2019 when staff first notified TC Telephone they believed their prior instructions regarding calculation of reimbursements for lost revenues might be incorrect. There were many emails related to specific month invoices that are not being produced due to volume, though TC Telephone will attempt to locate and produce such emails if they would be helpful.

² See Attachment 3 dated July 10, 2019.

³ See Attachment 1 dated June 26, 2019, Attachment 3 dated July 10, 2019, Attachment 4 dated July 08, 2019, and Attachment 12 dated August 13, 2019.

⁴ See Attachment 7 dated July 29, 2019, Attachment 9 dated August 07, 2019, and Attachment 11 dated August 09, 2019.

Division) determined that a formal Commission decision would be required to revise the reimbursement methodology for lost revenues. At that point, Mr. Robert Wullenjohn sent TC Telephone a letter dated August 9, 2019, stating that TC Telephone should continue seeking reimbursements as it had done previously. He stated, “CD will process payments to the Company on a per-minute basis until the Commission addresses in a public process the question of whether an alternative basis should be used.” TC Telephone located the email from Mr. Wullenjohn conveying the letter and is including it in this production.⁵

In addition to the letter from Mr. Wullenjohn, TC Telephone found a subsequent email dated August 13, 2019 in which the staff person who processed TC Telephone invoices provided the same instruction explicitly allowing TC Telephone to continue calculating reimbursements for lost revenue (both for calls 0-60 and 61+ calls) on a per-minute basis:

*Please submit the June and July 2019 claim with the Untimed Call calculation instructions that TC Telephone previously were following. We will continue to approve this until the Commission has a resolution. The June and July 2019 claims will be expedited.*⁶

Thus, not only did staff indicate in writing that it was permissible for TC Telephone to continue seeking reimbursements for lost revenues as it had since 2013, but staff expedited processing the claims that had been delayed during the confusion over TC Telephone’s calculation methodology.

In January 2020, the Commission issued a draft resolution clarifying that reimbursement for lost revenues could be sought only on a per-call rather than per-minute basis. Resolution T-16787 was approved by the Commission and issued on March 26, 2020. It stated that the rule requiring per-call reimbursement calculations would apply only prospectively. Resolution T-16787 did not address rules for reimbursement of lost revenues for calls above 60, thus TC

⁵ See Attachment 10 dated August 09, 2019.

⁶ See Attachment 12 dated August 13, 2019.

Telephone believed it could file claims for such calls. Indeed, a CD staffer advised TC Telephone in May 2020 that even though a new version of the Lifeline claim form had been issued without a line to claim lost revenues for calls 61+ each month, it was permissible for TC Telephone to add a line on its claim form to request such reimbursement.⁷

As indicated in TC Telephone's Table of Undisputed Facts filed on March 16, 2023, it is beyond dispute that TC Telephone's claim forms for lost revenues from January 2018 through March 2020 were proper based on staff instructions and Resolution T-17687. Beginning in April 2020, TC Telephone had additional communications with staff regarding whether its claim forms were in compliance with Resolution T-17687. TC Telephone is producing a subset of those emails due to volume. The emails provide pivotal communications regarding the April through October 2020 claim forms.

In particular, TC Telephone is providing an email dated June 19, 2020 from a supervisory CD staffer instructing that TC Telephone claim forms for April 2020 and beyond be denied.⁸ TC Telephone notes that at the time of the June 19 email, CD staff would not have received claim forms for June, July, August, September or October, yet staff was instructed to reject TC Telephone's claim forms sight unseen. The Communications Division staff appears to have followed this instruction because after the April claim form was paid in October 2020, Commission staff stopped all payments and TC Telephone has not been reimbursed for May through October 2020 claim forms. TC Telephone is also producing an email to Mr. Robert Osborn regarding a sworn declaration submitted by the supervisory staff person in court stating that TC Telephone's claim forms for April through June 2020 complied with the directives set forth in Resolution T-17687.⁹ This statement is corroborated in the Order to Show cause, which

⁷ See Attachment 15 dated May 22, 2020.

⁸ See Attachment 14 dated June 19, 2020. This email was obtained through a California Public Records Act request.

⁹ See Attachment 16 dated September 15, 2020.

states that TC Telephone's May through October 2020 claim forms conform to staff requirements.¹⁰ Nonetheless, those claim forms have not been paid.

TC Telephone appreciates the opportunity to provide information for the record in this proceeding. TC Telephone notes that it is awaiting documents requested in a set of discovery issued on February 23, 2023 to the Consumer Protection and Enforcement Division ("CPED"). TC Telephone therefore reserves the right to provide supplemental documents once it receives the documents requested from CPED.

Signed and dated March 17, 2023.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Anita Taff-Rice", written over a horizontal line.

iCommLaw
Anita Taff-Rice
1547 Palos Verdes #298
Walnut Creek, CA 94597
Phone: (415) 699-7885
Fax: (925) 274-0988
Email: anita@icommlaw.com
Counsel for TC Telephone

¹⁰ Order to Show Cause at p. 44.

ATTACHMENT 1

Re: March 2019 CPUC Claim Filing

June 26, 2019

From: Aggie Hill <Hill.Aggie@TCTelephone.net>

Sent: Wednesday, June 26, 2019 7:27 AM

To: lifelineclaim <lifelineclaim@cpuc.ca.gov>

Cc: 'Anita Taff-Rice' <anita@icommlaw.com>; Aggie Hill <Hill.Aggie@TCTelephone.net>

Subject: Re: March 2019 CPUC Claim Filing

Good morning Tina,

Per our correspondence between Travis and Jonathan Lakritz (attached below for your convenience), we count the quantity of calls for the 0.08 calculation; however, since we are billed per the minutes used we claim the actual minutes used by the customer as this is a loss of revenue.

From: "Jonathan Lakritz" <jonathan.lakritz@cpuc.ca.gov>

To: "travis" <travis@tctelephone.net>

Cc: "Benjamin Schein" <benjamin.schein@cpuc.ca.gov>, "anna jew" <anna.jew@cpuc.ca.gov>, "Fe Lazaro" <fe.lazaro@cpuc.ca.gov>

Sent: Friday, May 10, 2013 6:53:45 PM

Subject: RE: Any word on the Untimed calls?

Hi Travis

As with many policies established over decisions spanning a decade or more, the rules are not always clear. I can explain how carriers have historically requested compensation. What I am not able to do is give you a set of specific rules because the Commission's decisions do not clearly establish policies for staff to follow. For the time being if you follow what other carriers do we will timely process your claims.

For first 60 untimed calls--a carrier may file for lost revenues but are limited to the measured rate charged by the underlying ILEC

For calls in excess of first 60--a carrier can only charge lifeline customers \$0.08/minute. Carriers may claim lost revenues for the difference between the rate charged \$0.08/minute and the carrier's retail rate capped by the underlying ILEC's rate.

The claims staff have noted that our current claim form does not have specific lines for all the types of untimed calls (less than 31 or more than 60). I ask that you work with them on preparing your claim in advance of submitting your claim so we can timely process your claims.

Thank you.

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Sent: Monday, June 24, 2019 6:12:38 PM
To: Aggie Hill; lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

Thank you for correcting the amounts due to the programming error.

Call vs Minutes

I noticed that TC Telephone was claiming for minutes for the untimed calls. The untimed calls should be claiming for # of calls and not total minutes per call. Please explain why TC Telephone was claiming for the minutes?

Thank you
~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>
Sent: Friday, June 21, 2019 1:58 PM
To: Lee, Tina <tina.lee@cpuc.ca.gov>; lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: 'Anita Taff-Rice' <anita@icommlaw.com>
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

We have a new programmer who went over the data tediously as previous mentioned and uncovered the following:

For March, we actually under claimed by \$28.28.

For April, we over claimed by \$49,204.68 due to a programming error.

The programming error has since been corrected to reflect accurate data moving forward.

I've updated the claim forms to reflect the correct numbers of our 0-60 and 60+ records and attached to this email along with the signed documents for each.

Additionally, I'm uploading the call details for each month to the ftp server for you to have as well.

Should you have any questions please let me know.

Thank you and have a good weekend!



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Thursday, June 20, 2019 6:52:14 PM
To: Lee, Tina; lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,
We've had our programmer going over this with a fine tooth comb for accuracy. I will have some resolve for you by EOD tomorrow.

Thanks!



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Lee, Tina <tina.lee@cpuc.ca.gov>
Sent: Thursday, June 13, 2019 4:32:15 PM
To: lifelineclaim; Aggie Hill
Cc: 'Anita Taff-Rice'
Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

I reviewed the untimed calls supporting documentation for April, titled "Usage_2019_04Apr_0to60_Details for CPUC" and noticed that the total number of calls made in April from 1 – 60 calls were 773,156.

I calculated TC Telephone's subscriber count and all outbound subscribers which = 8,076 max amount of subscribers. If all 8,076 subscribers made 60 calls that would = 484,560.

Please explain TC Telephone's call count of 773,156 which equals to 2,142,439 minutes.

Please reply by 6/20/2019.

Thank you
~Tina

From: lifelineclaim

Sent: Tuesday, June 11, 2019 1:59 PM

To: 'Aggie Hill' <Hill.Aggie@TCTelephone.net>; lifelineclaim <lifelineclaim@cpuc.ca.gov>

Cc: 'Anita Taff-Rice' <anita@icommlaw.com>

Subject: RE: March 2019 CPUC Claim Filing

Thank you Aggie, for submitting all the supporting documentations that were requested.

I have another question about the untimed calls of 2,142,439 from the April 2019 claim. How was that calculated because TC Telephone's Subscribers total was 6,411. How did the 6,411 Subscribers make 60 calls 2,142,439 times?

The max call count should be 384,660 if 6,411 subscribers made 60 calls. Please help me understand the large call count listed in the claim.

Thank you
~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>

Sent: Friday, June 07, 2019 11:49 AM

To: lifelineclaim <lifelineclaim@cpuc.ca.gov>

Cc: 'Anita Taff-Rice' <anita@icommlaw.com>

Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

As promised, I just submitted the April 2019 usage details via kiteworks.

I will have the breakdown of 01-60 and 60+ for both months to you on Monday.

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Friday, June 7, 2019 10:05:40 AM
To: lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,
I realized I didn't answer your question as to the usage amounts.

We've found that often customers use the usage more once they are comfortable with their phone service, typically after the first month. Given we have continued to grow and add more customers monthly it only stands to reason that our usage would grow as well.

That being said, we track our percentage of growth or loss in all areas of our business on a monthly basis.

Regarding the usage, below is the trending which we show from May 2018 to current:

May 2018: 7.57%
June 2018: 7.69%
July 2018: 7.15%
August 2018: 6.70%
September 2018: 4.50%
October 2018: 15.80%
November 2018: -4.40%
December 2018: 4.30%
January 2019: 1.05%
February 2019: 7.04%
March 2019: 21.05%
April 2019: -0.71%

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Friday, June 7, 2019 9:51:50 AM

To: lifelineclaim
Cc: 'Anita Taff-Rice'; Aggie Hill
Subject: Re: March 2019 CPUC Claim Filing

Good morning Tina,
I found my login to the Kiteworks site the CPUC uses and have just loaded the March 2019 usage details. In an effort of transparency, I have provided you with the full usage details, but will also provide you with the breakdown of the 01-60 and 60+ from this file.

I will be sending the April 2019 usage details today as well.

The breakdown of 01-60 and 60+ will be provided to you by Monday.

Should you have any questions please let me know.

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Thursday, June 6, 2019 5:09:07 PM
To: lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,
Given the size of the files are so large, do you have an ftp site set up where we can securely submit this information to you?

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Sent: Tuesday, June 4, 2019 12:42:42 PM
To: lifelineclaim; Aggie Hill

Cc: 'Anita Taff-Rice'

Subject: RE: March 2019 CPUC Claim Filing

Good Morning Aggie,

I am following up on my previous email regarding the untimed calls on the March and April 2019 claim. Please provide supporting documentation on the untimed calls?

Please explain why there is an increase of untimed calls every month. The untimed calls amount of \$506,016.06 will be disallowed from the April 2019 claim. You may amend the claim after you have submitted the supporting documentation and explained in detail why the untimed calls have been increasing. Please provide the information by June 11.

Thank you

~Tina

From: Lee, Tina <tina.lee@cpuc.ca.gov>

Sent: Thursday, May 30, 2019 3:14 PM

To: lifelineclaim <lifelineclaim@cpuc.ca.gov>; Aggie Hill <Hill.Aggie@TCTelephone.net>

Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

Please provide the supporting documentation for the Untimed Calls by Thursday June 6. We will be disallowing the untimed calls for the April 2019 claim if the information is not provided. We are requesting for supporting documentation for the March and April untimed calls.

Please explain why there is an increase of untimed calls every month.

Thank you

~Tina

From: lifelineclaim

Sent: Thursday, May 30, 2019 9:03 AM

To: 'Aggie Hill' <Hill.Aggie@TCTelephone.net>; lifelineclaim <lifelineclaim@cpuc.ca.gov>

Subject: RE: March 2019 CPUC Claim Filing

Good Morning Aggie,

I have another question about TC Telephone's Untimed Calls. I noticed that the untimed calls have been increasing every month. Do you know why?

Thank you

~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>

Sent: Wednesday, May 08, 2019 1:12 PM

To: lifelineclaim <lifelineclaim@cpuc.ca.gov>

Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

We were so focused on getting the filing out this week, that this was pushed behind.
I'll have the details to you by tomorrow.

Thanks,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill

Sent: Monday, April 29, 2019 9:47:41 AM

To: lifelineclaim

Cc: Invoices

Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

I will have this pulled and sent over to you this week.

Have a good Monday!



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: lifelineclaim <lifelineclaim@cpuc.ca.gov>

Sent: Friday, April 26, 2019 2:24:02 PM

To: Aggie Hill; lifelineclaim

Cc: Invoices

Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

I have a question about the untimed calls. Please explain how the Untimed Call Counts were calculated and show supporting documentation for the 1,656,732 calls.

Claim Form Line #	Allowable Recovery Untimed Calls			
9	Calls	Count	Rate	Amount
	01-60	1,656,732	\$0.20	\$331,346.40
	60+	743,312	\$0.20	\$148,662.40
Calls over 60	Customer Payments	287,304	\$0.08	\$22,984.32
	Total	2,400,044		\$457,024.48

Thank you
~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>
Sent: Thursday, April 04, 2019 12:56 PM
To: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: Invoices <invoices@aegisbusinesscredit.com>
Subject: March 2019 CPUC Claim Filing

Hi Tina,
Please find attached the March 2019 Claim Filing. Please confirm receipt at your earliest convenience.

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

--

iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

ATTACHMENT 2

RE: March 2019 CPUC Claim Filing

July 03, 2019

From: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Date: July 3, 2019 at 4:42:30 PM CDT
To: Aggie Hill <Hill.Aggie@TCTelephone.net>, lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: 'Anita Taff-Rice' <anita@icommlaw.com>
Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

We will get more clarity on the untimed calls from Management during next week's meeting.

~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>
Sent: Wednesday, July 03, 2019 1:02 PM
To: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: 'Anita Taff-Rice' <anita@icommlaw.com>
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

Would you please respond to the question I posed?

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Tuesday, July 2, 2019 1:30:43 PM
To: lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

I've been thinking about your correspondence and I'm wondering if what you're trying to convey is that you would like us to claim the quantity of calls on the untimed calls section of the claim form; however, we can claim the difference as lost revenue on the "Lines 13 & 14" tab of the CPUC claim file under "other expenses, true ups and credits"?

Please help me understand if this is what you're trying to convey?

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Tuesday, July 2, 2019 9:46:40 AM
To: lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: Re: March 2019 CPUC Claim Filing

Good morning Tina,

We have researched the effect that your revision to the existing approach of calculating reimbursements would have and determined that it would substantially harm our ability to continue operating. This is especially true because you are suggesting retroactive revisions, and TC Telephone has already made financial commitments (such as payroll) based on the expected reimbursement amounts. Therefore, we respectfully request that you process the April and May invoices as they have been processed for years, and give us an opportunity to discuss this revision further with you and whoever else in your department needs to be included.

I am copying our attorney Anita so that you can reach out to her to schedule an in-person meeting as soon as possible.

Thank you in advance,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Sent: Thursday, June 27, 2019 2:44:15 PM
To: Aggie Hill; lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

I spoke to Jonathan and we realized that TC Telephone was misinformed. The untimed calls should not be calculated by minutes. The untimed calls should be calculated by call amount. We will not require TC Telephone to submit amended claims for prior month claims. The corrections will be made starting from the April 2019 claim. Please submit amended claims which calculates the total untimed call counts instead of the minutes for April and May. The April and May untimed calls were disallowed. We disallowed the untimed call amount of \$506,016.06 from the April claim.

Decision 00-10-028: The CPUC would “allow every utility to recover from the ULTS Fund the lost revenues it incurs to provide 60 untimed local calls per month to ULTS measured service customers to the extent that the utility does not recover these lost revenues any other sources; and (2) cap the amount of lost revenues that a utility may recover from the ULTS Fund for the provision of untimed local calls to a particular ULTS customer to the amount of lost revenues that the customer’s ILEC would recover from the ULTS Fund.” (Page 110-111).

~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>
Sent: Wednesday, June 26, 2019 7:27 AM
To: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: 'Anita Taff-Rice' <anita@icommlaw.com>; Aggie Hill <Hill.Aggie@TCTelephone.net>
Subject: Re: March 2019 CPUC Claim Filing

Good morning Tina,

Per our correspondence between Travis and Jonathan Lakritz (attached below for your convenience), we count the quantity of calls for the 0.08 calculation; however, since we are billed per the minutes used we claim the actual minutes used by the customer as this is a loss of revenue.

From: "Jonathan Lakritz" <jonathan.lakritz@cpuc.ca.gov>
To: "travis" <travis@tctelephone.net>
Cc: "Benjamin Schein" <benjamin.schein@cpuc.ca.gov>, "anna jew" <anna.jew@cpuc.ca.gov>, "Fe Lazaro" <fe.lazaro@cpuc.ca.gov>
Sent: Friday, May 10, 2013 6:53:45 PM
Subject: RE: Any word on the Untimed calls?

Hi Travis

As with many policies established over decisions spanning a decade or more, the rules are not always clear. I can explain how carriers have historically requested compensation. What I am not able to do is give you a set of specific rules because the Commission's decisions do not clearly establish policies for staff to follow. For the time being if you follow what other carriers do we will timely process your claims.

For first 60 untimed calls--a carrier may file for lost revenues but are limited to the measured rate charged by the underlying ILEC

For calls in excess of first 60--a carrier can only charge lifeline customers \$0.08/minute. Carriers may claim lost revenues for the difference between the rate charged \$0.08/minute and the carrier's retail rate capped by the underlying ILEC's rate.

The claims staff have noted that our current claim form does not have specific lines for all the types of untimed calls (less than 31 or more than 60). I ask that you work with them on preparing your claim in advance of submitting your claim so we can timely process your claims.

Thank you.

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080

From: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Sent: Monday, June 24, 2019 6:12:38 PM
To: Aggie Hill; lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

Thank you for correcting the amounts due to the programming error.

Call vs Minutes

I noticed that TC Telephone was claiming for minutes for the untimed calls. The untimed calls should be claiming for # of calls and not total minutes per call. Please explain why TC Telephone was claiming for the minutes?

Thank you
~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>
Sent: Friday, June 21, 2019 1:58 PM
To: Lee, Tina <tina.lee@cpuc.ca.gov>; lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: 'Anita Taff-Rice' <anita@icommlaw.com>
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

We have a new programmer who went over the data tediously as previous mentioned and uncovered the following:

For March, we actually under claimed by \$28.28.

For April, we over claimed by \$49,204.68 due to a programming error.

The programming error has since been corrected to reflect accurate data moving forward.

I've updated the claim forms to reflect the correct numbers of our 0-60 and 60+ records and attached to this email along with the signed documents for each.

Additionally, I'm uploading the call details for each month to the ftp server for you to have as well.

Should you have any questions please let me know.

Thank you and have a good weekend!



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Thursday, June 20, 2019 6:52:14 PM
To: Lee, Tina; lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

We've had our programmer going over this with a fine tooth comb for accuracy. I will have some resolve for you by EOD tomorrow.

Thanks!



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Lee, Tina <tina.lee@cpuc.ca.gov>
Sent: Thursday, June 13, 2019 4:32:15 PM

To: lifelineclaim; Aggie Hill
Cc: 'Anita Taff-Rice'
Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

I reviewed the untimed calls supporting documentation for April, titled "Usage_2019_04Apr_0to60_Details for CPUC" and noticed that the total number of calls made in April from 1 – 60 calls were 773,156.

I calculated TC Telephone's subscriber count and all outbound subscribers which = 8,076 max amount of subscribers. If all 8,076 subscribers made 60 calls that would = 484,560.

Please explain TC Telephone's call count of 773,156 which equals to 2,142,439 minutes.

Please reply by 6/20/2019.

Thank you
~Tina

From: lifelineclaim
Sent: Tuesday, June 11, 2019 1:59 PM
To: 'Aggie Hill' <Hill.Aggie@TCTelephone.net>; lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: 'Anita Taff-Rice' <anita@icommlaw.com>
Subject: RE: March 2019 CPUC Claim Filing

Thank you Aggie, for submitting all the supporting documentations that were requested.

I have another question about the untimed calls of 2,142,439 from the April 2019 claim. How was that calculated because TC Telephone's Subscribers total was 6,411. How did the 6,411 Subscribers make 60 calls 2,142,439 times?

The max call count should be 384,660 if 6,411 subscribers made 60 calls. Please help me understand the large call count listed in the claim.

Thank you
~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>
Sent: Friday, June 07, 2019 11:49 AM
To: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: 'Anita Taff-Rice' <anita@icommlaw.com>
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

As promised, I just submitted the April 2019 usage details via kiteworks.

I will have the breakdown of 01-60 and 60+ for both months to you on Monday.

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Friday, June 7, 2019 10:05:40 AM
To: lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

I realized I didn't answer your question as to the usage amounts.

We've found that often customers use the usage more once they are comfortable with their phone service, typically after the first month. Given we have continued to grow and add more customers monthly it only stands to reason that our usage would grow as well.

That being said, we track our percentage of growth or loss in all areas of our business on a monthly basis.

Regarding the usage, below is the trending which we show from May 2018 to current:

May 2018: 7.57%

June 2018: 7.69%

July 2018: 7.15%

August 2018: 6.70%

September 2018: 4.50%

October 2018: 15.80%

November 2018: -4.40%

December 2018: 4.30%

January 2019: 1.05%

February 2019: 7.04%

March 2019: 21.05%

April 2019: -0.71%

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Friday, June 7, 2019 9:51:50 AM
To: lifelineclaim
Cc: 'Anita Taff-Rice'; Aggie Hill
Subject: Re: March 2019 CPUC Claim Filing

Good morning Tina,

I found my login to the Kiteworks site the CPUC uses and have just loaded the March 2019 usage details. In an effort of transparency, I have provided you with the full usage details, but will also provide you with the breakdown of the 01-60 and 60+ from this file.

I will be sending the April 2019 usage details today as well.

The breakdown of 01-60 and 60+ will be provided to you by Monday.

Should you have any questions please let me know.

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Thursday, June 6, 2019 5:09:07 PM
To: lifelineclaim
Cc: 'Anita Taff-Rice'
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

Given the size of the files are so large, do you have an ftp site set up where we can securely submit this information to you?

Thank you,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Sent: Tuesday, June 4, 2019 12:42:42 PM
To: lifelineclaim; Aggie Hill
Cc: 'Anita Taff-Rice'
Subject: RE: March 2019 CPUC Claim Filing

Good Morning Aggie,

I am following up on my previous email regarding the untimed calls on the March and April 2019 claim. Please provide supporting documentation on the untimed calls?
Please explain why there is an increase of untimed calls every month. The untimed calls amount of \$506,016.06 will be disallowed from the April 2019 claim. You may amend the claim after you have submitted the supporting documentation and explained in detail why the untimed calls have been increasing. Please provide the information by June 11.

Thank you
~Tina

From: Lee, Tina <tina.lee@cpuc.ca.gov>
Sent: Thursday, May 30, 2019 3:14 PM
To: lifelineclaim <lifelineclaim@cpuc.ca.gov>; Aggie Hill <Hill.Aggie@TCTelephone.net>
Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

Please provide the supporting documentation for the Untimed Calls by Thursday June 6. We will be disallowing the untimed calls for the April 2019 claim if the information is not provided. We are requesting for supporting documentation for the March and April untimed calls.
Please explain why there is an increase of untimed calls every month.

Thank you
~Tina

From: lifelineclaim
Sent: Thursday, May 30, 2019 9:03 AM
To: 'Aggie Hill' <Hill.Aggie@TCTelephone.net>; lifelineclaim <lifelineclaim@cpuc.ca.gov>
Subject: RE: March 2019 CPUC Claim Filing

Good Morning Aggie,

I have another question about TC Telephone's Untimed Calls. I noticed that the untimed calls have been increasing every month. Do you know why?

Thank you

~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>
Sent: Wednesday, May 08, 2019 1:12 PM
To: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

We were so focused on getting the filing out this week, that this was pushed behind.

I'll have the details to you by tomorrow.

Thanks,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: Aggie Hill
Sent: Monday, April 29, 2019 9:47:41 AM
To: lifelineclaim
Cc: Invoices
Subject: Re: March 2019 CPUC Claim Filing

Hi Tina,

I will have this pulled and sent over to you this week.

Have a good Monday!

Aggie Hill
Operations Manager



TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Sent: Friday, April 26, 2019 2:24:02 PM
To: Aggie Hill; lifelineclaim
Cc: Invoices
Subject: RE: March 2019 CPUC Claim Filing

Hi Aggie,

I have a question about the untimed calls. Please explain how the Untimed Call Counts were calculated and show supporting documentation for the 1,656,732 calls.

Claim Form Line #	Allowable Recovery Untimed Calls			
9	Calls	Count	Rate	Amount
	01-60	1,656,732	\$0.20	\$331,346.40
	60+	743,312	\$0.20	\$148,662.40
Calls over 60	Customer Payments	287,304	\$0.08	\$22,984.32
	Total	2,400,044		\$457,024.48

Thank you
~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>
Sent: Thursday, April 04, 2019 12:56 PM
To: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: Invoices <invoices@aegisbusinesscredit.com>
Subject: March 2019 CPUC Claim Filing

Hi Tina,

Please find attached the March 2019 Claim Filing. Please confirm receipt at your earliest convenience.

Thank you,

Aggie Hill
Operations Manager



TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

ATTACHMENT 3

Fwd: RE: TC Telephone - CPUC 07.11.19 Meeting - Housekeeping item

July 10, 2019

----- Forwarded Message -----

Subject:Fwd: RE: TC Telephone - CPUC 07.11.19 Meeting - Housekeeping items

Date:Wed, 10 Jul 2019 12:03:18 -0700

From:Anita Taff-Rice <anita@icommlaw.com>

To:Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>

Hi Jonathan,

If you're back in the office today, I'm wondering if it would be helpful if we had a discussion prior to the meeting tomorrow so I can prep my client to be as helpful as possible. If there's any CPUC orders or resolutions that underlie the revision of calculation methodology, I'd like to know what they are so I will have time to fully review and discuss with the client before the meeting.

Also, if there's any particular information you and staff need, please let me know. I'm hopeful this is some error in communication and we'll be able to get it worked out face to face tomorrow. If needed, I can stay later than 2pm.

Thanks, Anita

----- Forwarded Message -----

Subject:RE: TC Telephone - CPUC 07.11.19 Meeting - Housekeeping items

Date:Wed, 10 Jul 2019 17:54:33 +0000

From:Lee, Tina <tina.lee@cpuc.ca.gov>

To:Anita Taff-Rice <anita@icommlaw.com>, Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>

CC:Aggie Hill <Hill.Aggie@TCTelephone.net>, Yun, Cindy J. <sindy.yun@cpuc.ca.gov>

Anita,

Please ask the security at the lobby to call me at 415-703-2285. The conference bridge was included in the meeting invite.

Conference Bridge: 866-912-9666

Passcode: 7032767

~Tina

From: Anita Taff-Rice <anita@icommlaw.com>
Sent: Tuesday, July 09, 2019 4:10 PM
To: Lee, Tina <tina.lee@cpuc.ca.gov>; Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>
Cc: Aggie Hill <Hill.Aggie@TCTelephone.net>; Yun, Cindy J. <sindy.yun@cpuc.ca.gov>
Subject: Re: TC Telephone - CPUC 07.11.19 Meeting - Housekeeping items

Jonathan and Tina,

I am writing to confirm our meeting at 1pm on 7/11 to discuss the topics in Aggie's letter. Ian Costello and myself will be attending in person, so we will plan to check in with the guard station a few minutes early. Who should we have the guard call for an escort? Aggie needs to participate by phone, so I'm hoping a conference bridge can be made available. We can use my conference bridge if needed so long as there is a speaker phone in the room.

Lastly, I wanted to ask if there are any questions, or documents we should bring with us on Thursday. Also, please let me know if you think any CPUC staff should attend other than the people on the distribution list since it's critical that we have the right people in the room to reach a resolution on Thursday.

Thanks, Anita

On 7/8/2019 11:49 AM, Aggie Hill wrote:

Good morning,

Please find attached from TC Telephone in preparation for the meeting on 07.11.19.

Thank you,

Aggie Hill



Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

--

iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

ATTACHMENT 4

TC Telephone - CPUC 07.11.19 Meeting Preparation

July 08, 2019

From: Aggie Hill

Sent: Monday, July 8, 2019 1:49 PM

To: Lee, Tina; Lakritz, Jonathan

Cc: 'anita@icommlaw.com'; Yun, Cindy J.

Subject: TC Telephone - CPUC 07.11.19 Meeting Preparation

Good morning,

Please find attached from TC Telephone in preparation for the meeting on 07.11.19.

Thank you,



Aggie Hill

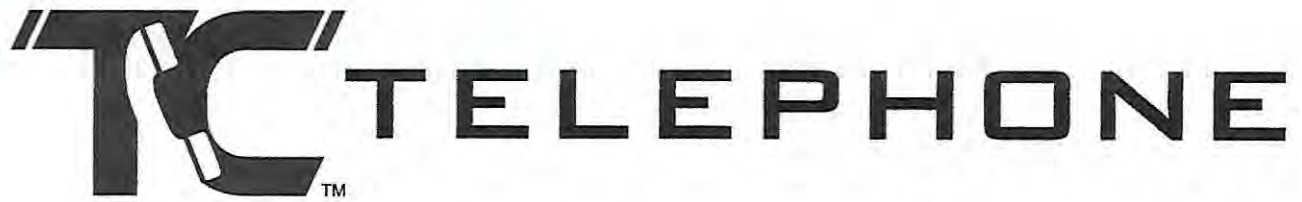
Operations Manager

TC Telephone

243 Washington Street

Red Bluff, California 96080

Mobile: 256-504-0696



Ms. Tina Lee
Mr. Jonathan Lakritz
California Public Utilities Commission
Communications Division
505 Van Ness Avenue
San Francisco, CA 94102

SENT VIA HAND DELIVERY AND EMAIL

July 8, 2019

Dear Tina and Jonathan,

In preparation for our meeting on July 11, 2019 to discuss the calculation methodology to be applied to TC Telephone requests for reimbursement for Lifeline services, I am writing to make sure we are on the same page regarding topics to be discussed.

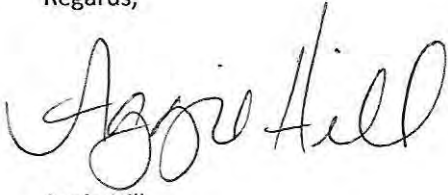
Because you have informally indicated that the methodology for calculating TC Telephone's reimbursement requests will be changed and applied retroactively for two months, I am including revised versions of TC Telephone's documentation for untimed calls for April 2019 and May 2019. As we have mentioned, the new methodology would decrease TC Telephone's reimbursement by 70 to 80 percent. If TC Telephone is unable to recover such a large amount of reimbursement, with no forewarning, it would have a catastrophic effect on our finances and likely cause us to go out of business. Since it serves no one's interest for one of the small number of Lifeline providers to be removed from the market, we are assuming that the Communications Division intends to allow for recovery of the now disallowed amounts.

I am enclosing revised a copy of your correspondence (via email) regarding the retroactive revision to TC Telephone's calculation method and revised April 2019 and May 2019 claim filings using the new methodology for the untimed calls calculation as outlined in that email along with the Lost Revenue claim for the difference based on these new calculations. In an effort to prevent a delay in processing TC Telephone's June 2019 reimbursement request, I applied the new calculation methodology and submitted it on Friday, July 5th.

We try our best to stay informed about Commission decisions affecting Lifeline, but are unaware of any formal Commission related to reimbursement calculations, so we look forward to discussing the revised calculation methodology and timing of payment letters. In particular, we request that staff be prepared to discuss the reason that the calculation methodology is being revised after six years, and whether this revision is being universally applied to all Lifeline providers. In addition to Anita, one of our general managers, Ian Costello, will be flying in from Florida to attend in person and I will be attending by phone.

We have appreciated your prior assistance and look forward to working with Commission staff to maintain a healthy and thriving relationship as we continue to provide excellent service to the residents of California to the best of our ability.

Regards,

A handwritten signature in black ink that reads "Aggie Hill". The signature is fluid and cursive, with the first name "Aggie" written in a larger, more prominent script than the last name "Hill".

Aggie Hill

Operations Manager

TC Telephone, LLC

CC: Anita Taff-Rice

Sindy Yun

RE: March 2019 CPUC Claim Filing

lifelineclaim

Thu 6/27/2019 2:44 PM

To: Aggie Hill <Hill.Aggie@TCTelephone.net>; lifelineclaim <lifelineclaim@cpuc.ca.gov>;

Cc: 'Anita Taff-Rice' <anita@icommlaw.com>;

Hi Aggie,

I spoke to Jonathan and we realized that TC Telephone was misinformed. The untimed calls should not be calculated by minutes. The untimed calls should be calculated by call amount. We will not require TC Telephone to submit amended claims for prior month claims. The corrections will be made starting from the April 2019 claim. Please submit amended claims which calculates the total untimed call counts instead of the minutes for April and May. The April and May untimed calls were disallowed. We disallowed the untimed call amount of \$506,016.06 from the April claim.

Decision 00-10-028: The CPUC would "allow every utility to recover from the ULTS Fund the lost revenues it incurs to provide 60 untimed local calls per month to ULTS measured service customers to the extent that the utility does not recover these lost revenues any other sources; and (2) cap the amount of lost revenues that a utility may recover from the ULTS Fund for the provision of untimed local calls to a particular ULTS customer to the amount of lost revenues that the customer's ILEC would recover from the ULTS Fund." (Page 110-111).

~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>

Sent: Wednesday, June 26, 2019 7:27 AM

To: lifelineclaim <lifelineclaim@cpuc.ca.gov>

Cc: 'Anita Taff-Rice' <anita@icommlaw.com>; Aggie Hill <Hill.Aggie@TCTelephone.net>

Subject: Re: March 2019 CPUC Claim Filing

Good morning Tina,

Per our correspondence between Travis and Jonathan Lakritz (attached below for your convenience), we count the quantity of calls for the 0.08 calculation; however, since we are billed per the minutes used we claim the actual minutes used by the customer as this is a loss of revenue.

From: "Jonathan Lakritz" <jonathan.lakritz@cpuc.ca.gov>

To: "travis" <travis@tctelephone.net>

Cc: "Benjamin Schein" <benjamin.schein@cpuc.ca.gov>, "anna jew" <anna.jew@cpuc.ca.gov>, "Fe Lazaro" <fe.lazaro@cpuc.ca.gov>

Sent: Friday, May 10, 2013 6:53:45 PM

Subject: RE: Any word on the Untimed calls?

Hi Travis

As with many policies established over decisions spanning a decade or more, the rules are not always clear. I can explain how carriers have historically requested compensation. What I am not able to do is give you a set of specific rules because the Commission's decisions do not clearly establish policies for staff to follow. For the time being if you follow what other carriers do we will timely process your claims.


For first 60 untimed calls--a carrier may file for lost revenues but are limited to the measured rate charged by the underlying ILEC

For calls in excess of first 60--a carrier can only charge lifeline customers \$0.08/minute. Carriers may claim lost revenues for the difference between the rate charged \$0.08/minute and the carrier's retail rate capped by the underlying ILEC's rate.

The claims staff have noted that our current claim form does not have specific lines for all the types of untimed calls (less than 31 or more than 60). I ask that you work with them on preparing your claim in advance of submitting your claim so we can timely process your claims.

Thank you.

Thank you,

 1503085942
503_TC

Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080

ATTACHMENT 5

Signed Claim Form Summary Sheets for the Unpaid May - October
2020 Claims forms (Amended) submitted to the Commission reflecting
compliance with Resolution T-16787

California LifeLine Report and Claim Form

For Period of April 2020 Partial Amendment

California LifeLine Service Provider TC Telephone LLC
CPCN 6875

BASIC SERVICE RECOVERY

1. Allowable SSA for Flat Rate Service, F	\$	-
1.1 Allowable SSA for Flat Rate Service, F (Tribal)	\$	-
2. Allowable SSA for Flat Rate Service, CA-only eligibility	\$	-
2.1 Allowable SSA for Flat Rate Service, C (Tribal)	\$	-
2.2 Allowable SSA for Flat Rate Service, C (TTY)	\$	-
2.3 Allowable SSA for Flat Rate Service, C (TTY and Tribal)	\$	-
3. Allowable SSA for Measured Rate Service, F	\$	125,393.10
3.1 Allowable SSA for Measured Rate Service, F (Tribal)	\$	-
4. Allowable SSA for Measured Rate Service, CA-only eligibility	\$	5,266.55
4.1 Allowable SSA for Measured Rate Service, C (Tribal)	\$	-
4.2 Allowable SSA for Measured Rate Service, C (TTY)	\$	-
4.3 Allowable SSA for Measured Rate Service, C (TTY and Tribal)	\$	-
5. Connection Charges, F	\$	26,247.00
5.1 Connection Charges, F (Tribal)	\$	-
6. Connection Charges, CA-only eligibility	\$	-
6.1 Connection Charges, C (Tribal)	\$	-
6.2 Connection Charges, C (TTY)	\$	-
6.3 Connection Charge, C (TTY and Tribal)	\$	-
7. Conversion Charges, F	\$	-
7.1 Conversion Charges, F (Tribal)	\$	-
8. Conversion Charges, CA-only eligibility	\$	-
8.1 Conversion Charges, C (Tribal)	\$	-
8.2 Conversion Charges, C (TTY)	\$	-
8.3 Conversion Charge, C (TTY and Tribal)	\$	-
9. Allowable Recovery -- Untimed Calls	\$	75,862.50
9.1 Allowable Recovery -- Untimed Calls (TTY)	\$	-
10. Surcharges and Taxes	\$	10,294.40

ADMINISTRATIVE EXPENSE RECOVERY

(Choose either Line 11 or Line 12 Methodology)

11. Incremental Administrative Expenses	\$	4,399.32
12. Administrative Expense Cost Factor	\$	-
13. Implementation Costs -New Reporting Requirements (Non-Recurring):	\$	-
By Commission Order: _____		
14. Other expenses, true-ups and credits	\$	-
15. TOTAL CLAIMS*	\$	247,462.87

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing claim, (including any accompanying schedules, statements, and workpapers) is true and has been examined by me and to the best of my knowledge and belief is a true, correct and complete claim.

Signature _____

Preparer James Adam
Address 2205 Hilltop Drive #262
Redding, CA 96002

Title General Manager
Date 5/06/2020
Amended 09/24/20
Phone 5307371005
Email adam.james@tctelephone.net

*Claimed amounts should be net of the support, if any, which the California LifeLine Service Provider expects to receive from the federal Lifeline Universal Service Fund (USF).

Email completed California LifeLine Claim Form and all supporting workpapers to lifelineclaim@cpuc.ca.gov

California LifeLine Report and Claim Form
For Period of May 2020 Partial Amendment

California LifeLine Service Provider TC Telephone LLC
CPCN 6875

BASIC SERVICE RECOVERY

1. Allowable SSA for Flat Rate Service, F	\$ -
1.1 Allowable SSA for Flat Rate Service, F (Tribal)	\$ -
1.4 Allowable SSA for Flat Rate Service, F**	\$ -
1.5 Allowable SSA for Flat Rate Service, F (Tribal)**	\$ -
2. Allowable SSA for Flat Rate Service, CA-only eligibility	\$ -
2.1 Allowable SSA for Flat Rate Service, C (Tribal)	\$ -
2.2 Allowable SSA for Flat Rate Service, C (TTY)	\$ -
2.3 Allowable SSA for Flat Rate Service, C (TTY and Tribal)	\$ -
2.4 Allowable SSA for Flat Rate Service, CA-only eligibility**	\$ -
2.5 Allowable SSA for Flat Rate Service, C (Tribal)**	\$ -
2.6 Allowable SSA for Flat Rate Service, C (TTY)**	\$ -
2.7 Allowable SSA for Flat Rate Service, C (TTY and Tribal)**	\$ -
3. Allowable SSA for Measured Rate Service, F	\$ -
3.1 Allowable SSA for Measured Rate Service, F (Tribal)	\$ -
3.4 Allowable SSA For Measured Rate Service, F**	\$ 125,780.39
3.5 Allowable SSA For Measured Rate Service, F (Tribal)**	\$ -
4. Allowable SSA for Measured Rate Service, CA-only eligibility	\$ -
4.1 Allowable SSA for Measured Rate Service, C (Tribal)	\$ -
4.2 Allowable SSA for Measured Rate Service, C (TTY)	\$ -
4.3 Allowable SSA for Measured Rate Service, C (TTY and Tribal)	\$ -
4.4 Allowable SSA for Measured Rate Service, CA-only eligibility**	\$ 5,260.32
4.5 Allowable SSA for Measured Rate Service, C (Tribal)**	\$ -
4.6 Allowable SSA for Measured Rate Service, C (TTY)**	\$ -
4.7 Allowable SSA for Measured Rate Service, C (TTY and Tribal)**	\$ -
5. Connection Charges, F	\$ 16,146.00
5.1 Connection Charges, F (Tribal)	\$ -
6. Connection Charges, CA-only eligibility	\$ -
6.1 Connection Charges, C (Tribal)	\$ -
6.2 Connection Charges, C (TTY)	\$ -
6.3 Connection Charge, C (TTY and Tribal)	\$ -
7. Conversion Charges, F	\$ 85.50
7.1 Conversion Charges, F (Tribal)	\$ -
8. Conversion Charges, CA-only eligibility	\$ -
8.1 Conversion Charges, C (Tribal)	\$ -
8.2 Conversion Charges, C (TTY)	\$ -
8.3 Conversion Charge, C (TTY and Tribal)	\$ -
9. Allowable Recovery – Untimed Calls	\$ 76,488.75
9a Allowable Recovery – Untimed Calls Adjustments	\$ -
9.1 Allowable Recovery – Untimed Calls (TTY)	\$ -
9.1a Allowable Recovery-Untimed Calls (TTY) Adjustments	\$ -
10. Surcharges and Taxes	\$ 10,324.42

ADMINISTRATIVE EXPENSE RECOVERY

(Choose either Line 11 or Line 12 Methodology)

11. Incremental Administrative Expenses	\$ 3,822.21
12. Administrative Expense Cost Factor	\$ -
13. Implementation Costs -New Reporting Requirements (Non-Recurring):	\$ -
By Commission Order: _____	\$ -
14. Other expenses, true-ups and credits	\$ -
15. TOTAL CLAIMS*	\$ 237,907.59

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing claim, (including any accompanying schedules, statements, and workpapers) is true and has been examined by me and to the best of my knowledge and belief is a true, correct and complete claim.

Signature _____
Preparer James Adam
Address 2205 Hilltop Drive #262
Redding, CA 96002

Title Manager
Date 6/05/2020
Amended 09/24/20
Phone 5307371005
Email adam.james@tctelephone.net

*Claimed amounts should be net of the support, if any, which the California LifeLine Service Provider expects to receive from the federal Lifeline Universal Service Fund (USF).

**Does not meet Federal Broadband Standards

Payment Terms: Net 90

Email completed California LifeLine Claim Form and all supporting workpapers to lifelineclaim@cpuc.ca.gov

California LifeLine Report and Claim Form

For Period of June 2020

California LifeLine Service Provider TC Telephone LLC

CPCN 6875

BASIC SERVICE RECOVERY

1. Allowable SSA for Flat Rate Service, F	\$	-
1.1 Allowable SSA for Flat Rate Service, F (Tribal)	\$	-
1.4 Allowable SSA for Flat Rate Service, F**	\$	-
1.5 Allowable SSA for Flat Rate Service, F (Tribal)**	\$	-
2. Allowable SSA for Flat Rate Service, CA-only eligibility	\$	-
2.1 Allowable SSA for Flat Rate Service, C (Tribal)	\$	-
2.2 Allowable SSA for Flat Rate Service, C (TTY)	\$	-
2.3 Allowable SSA for Flat Rate Service, C (TTY and Tribal)	\$	-
2.4 Allowable SSA for Flat Rate Service, CA-only eligibility**	\$	-
2.5 Allowable SSA for Flat Rate Service, C (Tribal)**	\$	-
2.6 Allowable SSA for Flat Rate Service, C (TTY)**	\$	-
2.7 Allowable SSA for Flat Rate Service, C (TTY and Tribal)**	\$	-
3. Allowable SSA for Measured Rate Service, F	\$	-
3.1 Allowable SSA for Measured Rate Service, F (Tribal)	\$	-
3.4 Allowable SSA for Measured Rate Service, F**	\$	132,317.06
3.5 Allowable SSA for Measured Rate Service, F (Tribal)**	\$	303.83
4. Allowable SSA for Measured Rate Service, CA-only eligibility	\$	-
4.1 Allowable SSA for Measured Rate Service, C (Tribal)	\$	-
4.2 Allowable SSA for Measured Rate Service, C (TTY)	\$	-
4.3 Allowable SSA for Measured Rate Service, C (TTY and Tribal)	\$	-
4.4 Allowable SSA for Measured Rate Service, CA-only eligibility**	\$	5,116.42
4.5 Allowable SSA for Measured Rate Service, C (Tribal)**	\$	-
4.6 Allowable SSA for Measured Rate Service, C (TTY)**	\$	-
4.7 Allowable SSA for Measured Rate Service, C (TTY and Tribal)**	\$	-
5. Connection Charges, F	\$	40,209.00
5.1 Connection Charges, F (Tribal)	\$	-
6. Connection Charges, CA-only eligibility	\$	-
6.1 Connection Charges, C (Tribal)	\$	-
6.2 Connection Charges, C (TTY)	\$	-
6.3 Connection Charge, C (TTY and Tribal)	\$	-
7. Conversion Charges, F	\$	99.75
7.1 Conversion Charges, F (Tribal)	\$	-
8. Conversion Charges, CA-only eligibility	\$	-
8.1 Conversion Charges, C (Tribal)	\$	-
8.2 Conversion Charges, C (TTY)	\$	-
8.3 Conversion Charge, C (TTY and Tribal)	\$	-
9. Allowable Recovery - Untimed Calls	\$	81,174.00
9a Allowable Recovery - Untimed Calls Adjustments	\$	-
9.1 Allowable Recovery - Untimed Calls (TTY)	\$	-
9.1a Allowable Recovery-Untimed Calls (TTY) Adjustments	\$	-
10. Surcharges and Taxes	\$	10,852.03

ADMINISTRATIVE EXPENSE RECOVERY

(Choose either Line 11 or Line 12 Methodology)

11. Incremental Administrative Expenses	\$	3,822.21
12. Administrative Expense Cost Factor	\$	-
13. Implementation Costs -New Reporting Requirements (Non-Recurring):	\$	-
By Commission Order:		
14. Other expenses, true-ups and credits	\$	-
15. TOTAL CLAIMS*	\$	273,894.30

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing claim, (including any accompanying schedules, statements, and workpapers) is true and has been examined by me and to the best of my knowledge and belief is a true, correct and complete claim.

Signature _____

Preparer James Adam

Address 2205 Hilltop Drive #262

Redding, CA 96002

Title Manager

Date 7/07/2020

09/24/20

Phone 5307371005

Email adam.james@tctelephone.net

*Claimed amounts should be net of the support, if any, which the California LifeLine Service Provider expects to receive from the federal Lifeline Universal Service Fund (USF).

**Does not meet Federal Broadband Standards

Payment Terms: Net 90

Email completed California LifeLine Claim Form and all supporting workpapers to lifelineclaim@cpuc.ca.gov

California LifeLine Report and Claim Form
For Period of July 2020

California LifeLine Service Provider TC Telephone LLC
CPCN 6875

BASIC SERVICE RECOVERY

1. Allowable SSA for Flat Rate Service, F	\$ -
1.1 Allowable SSA for Flat Rate Service, F (Tribal)	\$ -
1.4 Allowable SSA for Flat Rate Service, F**	\$ -
1.5 Allowable SSA for Flat Rate Service, F (Tribal)**	\$ -
2. Allowable SSA for Flat Rate Service, CA-only eligibility	\$ -
2.1 Allowable SSA for Flat Rate Service, C (Tribal)	\$ -
2.2 Allowable SSA for Flat Rate Service, C (TTY)	\$ -
2.3 Allowable SSA for Flat Rate Service, C (TTY and Tribal)	\$ -
2.4 Allowable SSA for Flat Rate Service, CA-only eligibility**	\$ -
2.5 Allowable SSA for Flat Rate Service, C (Tribal)**	\$ -
2.6 Allowable SSA for Flat Rate Service, C (TTY)**	\$ -
2.7 Allowable SSA for Flat Rate Service, C (TTY and Tribal)**	\$ -
3. Allowable SSA for Measured Rate Service, F	\$ -
3.1 Allowable SSA for Measured Rate Service, F (Tribal)	\$ -
3.4 Allowable SSA For Measured Rate Service, F**	\$ 145,328.34
3.5 Allowable SSA For Measured Rate Service, F (Tribal)**	\$ 326.70
4. Allowable SSA for Measured Rate Service, CA-only eligibility	\$ -
4.1 Allowable SSA for Measured Rate Service, C (Tribal)	\$ -
4.2 Allowable SSA for Measured Rate Service, C (TTY)	\$ -
4.3 Allowable SSA for Measured Rate Service, C (TTY and Tribal)	\$ -
4.4 Allowable SSA for Measured Rate Service, CA-only eligibility**	\$ 5,067.86
4.5 Allowable SSA for Measured Rate Service, C (Tribal)**	\$ -
4.6 Allowable SSA for Measured Rate Service, C (TTY)**	\$ -
4.7 Allowable SSA for Measured Rate Service, C (TTY and Tribal)**	\$ -
5. Connection Charges, F	\$ 60,723.00
5.1 Connection Charges, F (Tribal)	\$ -
6. Connection Charges, CA-only eligibility	\$ -
6.1 Connection Charges, C (Tribal)	\$ -
6.2 Connection Charges, C (TTY)	\$ -
6.3 Connection Charge, C (TTY and Tribal)	\$ -
7. Conversion Charges, F	\$ 71.25
7.1 Conversion Charges, F (Tribal)	\$ -
8. Conversion Charges, CA-only eligibility	\$ -
8.1 Conversion Charges, C (Tribal)	\$ -
8.2 Conversion Charges, C (TTY)	\$ -
8.3 Conversion Charge, C (TTY and Tribal)	\$ -
9. Allowable Recovery – Untimed Calls	\$ 87,823.50
9a Allowable Recovery – Untimed Calls Adjustments	\$ -
9.1 Allowable Recovery – Untimed Calls (TTY)	\$ -
9.1a Allowable Recovery-Untimed Calls (TTY) Adjustments	\$ -
10. Surcharges and Taxes	\$ 11,875.14

ADMINISTRATIVE EXPENSE RECOVERY

(Choose either Line 11 or Line 12 Methodology)

11. Incremental Administrative Expenses	\$ 3,822.21
12. Administrative Expense Cost Factor	\$ -
13. Implementation Costs -New Reporting Requirements (Non-Recurring): By Commission Order: _____	\$ -
14. Other expenses, true-ups and credits	\$ -
15. TOTAL CLAIMS*	\$ 315,038.00

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing claim, (including any accompanying schedules, statements, and workpapers) is true and has been examined by me and to the best of my knowledge and belief is a true, correct and complete claim.

Signature _____
Preparer James Adam
Address 2805 Hilltop Drive #262
Redding, CA 96002

Title Manager
Date 8/07/2020 Amended
09/24/20
Phone 5307371005
Email adam.james@tctelephone.net

*Claimed amounts should be net of the support, if any, which the California LifeLine Service Provider expects to receive from the federal Lifeline Universal Service Fund (USF).

**Does not meet Federal Broadband Standards

Payment Terms: Net 90

Email completed California LifeLine Claim Form and all supporting workpapers to lifelineclaim@cpuc.ca.gov

California LifeLine Report and Claim Form

For Period of August 2020

California LifeLine Service Provider TC Telephone LLC
CPCN 6875

BASIC SERVICE RECOVERY

1. Allowable SSA for Flat Rate Service, F	\$ -
1.1 Allowable SSA for Flat Rate Service, F (Tribal)	\$ -
1.4 Allowable SSA for Flat Rate Service, F**	\$ -
1.5 Allowable SSA for Flat Rate Service, F (Tribal)**	\$ -
2. Allowable SSA for Flat Rate Service, CA-only eligibility	\$ -
2.1 Allowable SSA for Flat Rate Service, C (Tribal)	\$ -
2.2 Allowable SSA for Flat Rate Service, C (TTY)	\$ -
2.3 Allowable SSA for Flat Rate Service, C (TTY and Tribal)	\$ -
2.4 Allowable SSA for Flat Rate Service, CA-only eligibility**	\$ -
2.5 Allowable SSA for Flat Rate Service, C (Tribal)**	\$ -
2.6 Allowable SSA for Flat Rate Service, C (TTY)**	\$ -
2.7 Allowable SSA for Flat Rate Service, C (TTY and Tribal)**	\$ -
3. Allowable SSA for Measured Rate Service, F	\$ -
3.1 Allowable SSA for Measured Rate Service, F (Tribal)	\$ -
3.4 Allowable SSA For Measured Rate Service, F**	\$ 158,264.62
3.5 Allowable SSA For Measured Rate Service, F (Tribal)**	\$ 326.70
4. Allowable SSA for Measured Rate Service, CA-only eligibility	\$ -
4.1 Allowable SSA for Measured Rate Service, C (Tribal)	\$ -
4.2 Allowable SSA for Measured Rate Service, C (TTY)	\$ -
4.3 Allowable SSA for Measured Rate Service, C (TTY and Tribal)	\$ -
4.4 Allowable SSA for Measured Rate Service, CA-only eligibility**	\$ 5,162.45
4.5 Allowable SSA for Measured Rate Service, C (Tribal)**	\$ -
4.6 Allowable SSA for Measured Rate Service, C (TTY)**	\$ -
4.7 Allowable SSA for Measured Rate Service, C (TTY and Tribal)**	\$ -
5. Connection Charges, F	\$ 45,630.00
5.1 Connection Charges, F (Tribal)	\$ -
6. Connection Charges, CA-only eligibility	\$ -
6.1 Connection Charges, C (Tribal)	\$ -
6.2 Connection Charges, C (TTY)	\$ -
6.3 Connection Charge, C (TTY and Tribal)	\$ -
7. Conversion Charges, F	\$ 71.25
7.1 Conversion Charges, F (Tribal)	\$ -
8. Conversion Charges, CA-only eligibility	\$ -
8.1 Conversion Charges, C (Tribal)	\$ -
8.2 Conversion Charges, C (TTY)	\$ -
8.3 Conversion Charge, C (TTY and Tribal)	\$ -
9. Allowable Recovery - Untimed Calls	\$ 89,814.25
9a Allowable Recovery - Untimed Calls Adjustments	\$ -
9.1 Allowable Recovery - Untimed Calls (TTY)	\$ -
9.1a Allowable Recovery-Untimed Calls (TTY) Adjustments	\$ -
10. Surcharges and Taxes	\$ 12,901.81

ADMINISTRATIVE EXPENSE RECOVERY

(Choose either Line 11 or Line 12 Methodology)

11. Incremental Administrative Expenses	\$ 3,822.21
12. Administrative Expense Cost Factor	\$ -
13. Implementation Costs -New Reporting Requirements (Non-Recurring):	\$ -
By Commission Order:	
14. Other expenses, true-ups and credits	\$ -
15. TOTAL CLAIMS*	\$ 315,993.29

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing claim, (including any accompanying schedules, statements, and workpapers) is true and has been examined by me and to the best of my knowledge and belief is a true, correct and complete claim.

Signature _____
Preparer James Adam
Address 2205 Hilltop Drive #262
Redding, CA 96002

Title Manager
Date 9/04/2020 Amended
09/25/20
Phone 5307371005
Email adam.james@tctelephone.net

*Claimed amounts should be net of the support, if any, which the California LifeLine Service Provider expects to receive from the federal Lifeline Universal Service Fund (USF).

**Does not meet Federal Broadband Standards

Payment Terms: Net 90

Email completed California LifeLine Claim Form and all supporting workpapers to lifelineclaim@cpuc.ca.gov

California LifeLine Report and Claim Form
For Period of September 2020

California LifeLine Service Provider TC Telephone LLC
CPCN 6875

BASIC SERVICE RECOVERY

1. Allowable SSA for Flat Rate Service, F	\$ -
1.1 Allowable SSA for Flat Rate Service, F (Tribal)	\$ -
1.4 Allowable SSA for Flat Rate Service, F**	\$ -
1.5 Allowable SSA for Flat Rate Service, F (Tribal)**	\$ -
2. Allowable SSA for Flat Rate Service, CA-only eligibility	\$ -
2.1 Allowable SSA for Flat Rate Service, C (Tribal)	\$ -
2.2 Allowable SSA for Flat Rate Service, C (TTY)	\$ -
2.3 Allowable SSA for Flat Rate Service, C (TTY and Tribal)	\$ -
2.4 Allowable SSA for Flat Rate Service, CA-only eligibility**	\$ -
2.5 Allowable SSA for Flat Rate Service, C (Tribal)**	\$ -
2.6 Allowable SSA for Flat Rate Service, C (TTY)**	\$ -
2.7 Allowable SSA for Flat Rate Service, C (TTY and Tribal)**	\$ -
3. Allowable SSA for Measured Rate Service, F	\$ -
3.1 Allowable SSA for Measured Rate Service, F (Tribal)	\$ -
3.4 Allowable SSA For Measured Rate Service, F**	\$ 161,505.04
3.5 Allowable SSA For Measured Rate Service, F (Tribal)**	\$ 327.15
4. Allowable SSA for Measured Rate Service, CA-only eligibility	\$ -
4.1 Allowable SSA for Measured Rate Service, C (Tribal)	\$ -
4.2 Allowable SSA for Measured Rate Service, C (TTY)	\$ -
4.3 Allowable SSA for Measured Rate Service, C (TTY and Tribal)	\$ -
4.4 Allowable SSA for Measured Rate Service, CA-only eligibility**	\$ 5,163.79
4.5 Allowable SSA for Measured Rate Service, C (Tribal)**	\$ -
4.6 Allowable SSA for Measured Rate Service, C (TTY)**	\$ -
4.7 Allowable SSA for Measured Rate Service, C (TTY and Tribal)**	\$ -
5. Connection Charges, F	\$ 12,402.00
5.1 Connection Charges, F (Tribal)	\$ -
6. Connection Charges, CA-only eligibility	\$ -
6.1 Connection Charges, C (Tribal)	\$ -
6.2 Connection Charges, C (TTY)	\$ -
6.3 Connection Charge, C (TTY and Tribal)	\$ -
7. Conversion Charges, F	\$ 128.25
7.1 Conversion Charges, F (Tribal)	\$ -
8. Conversion Charges, CA-only eligibility	\$ -
8.1 Conversion Charges, C (Tribal)	\$ -
8.2 Conversion Charges, C (TTY)	\$ -
8.3 Conversion Charge, C (TTY and Tribal)	\$ -
9. Allowable Recovery – Untimed Calls	\$ 83,961.25
9a Allowable Recovery – Untimed Calls Adjustments	\$ -
9.1 Allowable Recovery – Untimed Calls (TTY)	\$ -
9.1a Allowable Recovery-Untimed Calls (TTY) Adjustments	\$ -
10. Surcharges and Taxes	\$ 13,158.11

ADMINISTRATIVE EXPENSE RECOVERY

(Choose either Line 11 or Line 12 Methodology)

11. Incremental Administrative Expenses	\$ 3,822.21
12. Administrative Expense Cost Factor	\$ -
13. Implementation Costs -New Reporting Requirements (Non-Recurring):	\$ -
By Commission Order: _____	
14. Other expenses, true-ups and credits	\$ -
15. TOTAL CLAIMS*	\$ 280,467.80

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing claim, (including any accompanying schedules, statements, and workpapers) is true and has been examined by me and to the best of my knowledge and belief is a true, correct and complete claim.

Signature _____
Preparer James Adam
Address 2205 Hilltop Drive #262
Redding, CA 96002

Title Manager
Date 10/06/2020
Phone 5307371005
Email adam.james@tctelephone.net

*Claimed amounts should be net of the support, if any, which the California LifeLine Service Provider expects to receive from the federal Lifeline Universal Service Fund (USF).

**Does not meet Federal Broadband Standards

Payment Terms: Net 90

Email completed California LifeLine Claim Form and all supporting workpapers to lifelineclaim@cpuc.ca.gov

California LifeLine Report and Claim Form
For Period of October 2020

California LifeLine Service Provider TC Telephone LLC
CPCN 6875

BASIC SERVICE RECOVERY

1. Allowable SSA for Flat Rate Service, F	\$ -
1.1 Allowable SSA for Flat Rate Service, F (Tribal)	\$ -
1.4 Allowable SSA for Flat Rate Service, F**	\$ -
1.5 Allowable SSA for Flat Rate Service, F (Tribal)**	\$ -
2. Allowable SSA for Flat Rate Service, CA-only eligibility	\$ -
2.1 Allowable SSA for Flat Rate Service, C (Tribal)	\$ -
2.2 Allowable SSA for Flat Rate Service, C (TTY)	\$ -
2.3 Allowable SSA for Flat Rate Service, C (TTY and Tribal)	\$ -
2.4 Allowable SSA for Flat Rate Service, CA-only eligibility**	\$ -
2.5 Allowable SSA for Flat Rate Service, C (Tribal)**	\$ -
2.6 Allowable SSA for Flat Rate Service, C (TTY)**	\$ -
2.7 Allowable SSA for Flat Rate Service, C (TTY and Tribal)**	\$ -
3. Allowable SSA for Measured Rate Service, F	\$ -
3.1 Allowable SSA for Measured Rate Service, F (Tribal)	\$ -
3.4 Allowable SSA For Measured Rate Service, F**	\$ 153,920.70
3.5 Allowable SSA For Measured Rate Service, F (Tribal)**	\$ 326.70
4. Allowable SSA for Measured Rate Service, CA-only eligibility	\$ -
4.1 Allowable SSA for Measured Rate Service, C (Tribal)	\$ -
4.2 Allowable SSA for Measured Rate Service, C (TTY)	\$ -
4.3 Allowable SSA for Measured Rate Service, C (TTY and Tribal)	\$ -
4.4 Allowable SSA for Measured Rate Service, CA-only eligibility**	\$ 5,107.51
4.5 Allowable SSA for Measured Rate Service, C (Tribal)**	\$ -
4.6 Allowable SSA for Measured Rate Service, C (TTY)**	\$ -
4.7 Allowable SSA for Measured Rate Service, C (TTY and Tribal)**	\$ -
5. Connection Charges, F	\$ 156.00
5.1 Connection Charges, F (Tribal)	\$ -
6. Connection Charges, CA-only eligibility	\$ -
6.1 Connection Charges, C (Tribal)	\$ -
6.2 Connection Charges, C (TTY)	\$ -
6.3 Connection Charge, C (TTY and Tribal)	\$ -
7. Conversion Charges, F	\$ -
7.1 Conversion Charges, F (Tribal)	\$ -
8. Conversion Charges, CA-only eligibility	\$ -
8.1 Conversion Charges, C (Tribal)	\$ -
8.2 Conversion Charges, C (TTY)	\$ -
8.3 Conversion Charge, C (TTY and Tribal)	\$ -
9. Allowable Recovery – Untimed Calls	\$ 75,667.50
9a Allowable Recovery – Untimed Calls Adjustments	\$ -
9.1 Allowable Recovery – Untimed Calls (TTY)	\$ -
9.1a Allowable Recovery-Untimed Calls (TTY) Adjustments	\$ -
10. Surcharges and Taxes	\$ 12,555.23

ADMINISTRATIVE EXPENSE RECOVERY

(Choose either Line 11 or Line 12 Methodology)

11. Incremental Administrative Expenses	\$ 3,822.21
12. Administrative Expense Cost Factor	\$ -
13. Implementation Costs -New Reporting Requirements (Non-Recurring):	\$ -
By Commission Order:	
14. Other expenses, true-ups and credits	\$ -
15. TOTAL CLAIMS*	\$ 251,555.85

I hereby certify under the penalty of perjury under the laws of the State of California that the foregoing claim, (including any accompanying schedules, statements, and workpapers) is true and has been examined by me and to the best of my knowledge and belief is a true, correct and complete claim.

Signature _____
Preparer James Adam
Address 2205 Hilltop Drive #262
Redding, CA 96002

Title Manager
Date 11/09/2020
Phone 5307371005
Email adam.james@tctelephone.net

*Claimed amounts should be net of the support, if any, which the California LifeLine Service Provider expects to receive from the federal Lifeline Universal Service Fund (USF).

**Does not meet Federal Broadband Standards

Payment Terms: Net 90

Email completed California LifeLine Claim Form and all supporting workpapers to lifelineclaim@cpuc.ca.gov

ATTACHMENT 6

URGENT - request for interim reimbursement and meeting

July 26, 2019

----- Forwarded Message -----

Subject:URGENT - request for interim reimbursement and meeting

Date:Fri, 26 Jul 2019 17:44:39 -0700

From:Anita Taff-Rice <anitataffrice@earthlink.net>

To:Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>, Lee, Tina <tina.lee@cpuc.ca.gov>, Aggie Hill <Hill.Aggie@TCTelephone.net>, Yun, Sindy J. <sindy.yun@cpuc.ca.gov>, Sellden, You-Young (Clover) <You-Young.Sellden@cpuc.ca.gov>

Jonathan,

This is a huge problem for TC Telephone. As I mentioned, they are having serious financial difficulties and have had to start laying off workers. Despite these difficulties, we were willing to give staff two additional weeks to complete the analysis, and made plans based on the commitment that an answer would be provided no later than today. It has now been seven weeks, and will apparently be at least eight weeks that TC Telephone has received NO reimbursement for service provided to its Lifeline customers. This is financially crippling and will drive the company out of the market unless some interim accommodation is made.

Therefore, I am requesting a meeting to discuss interim payment while we await the final decision. At the very least, payment should be released to TC Telephone calculated on the per-unit amount (i.e. \$.20 per call). I can see no basis to withhold that amount since, at the least, a per-call amount is due.

Since you are going on vacation, please let me know who you recommend I contact to get the interim reimbursement.

Anita

On 7/26/2019 5:35 PM, Lakritz, Jonathan wrote:

Hi Anita,

I am sorry we have not reached out to you sooner. We were working diligently to wrap up our answer today, but alas that is not going to happen. Clover is taking lead on this with Tina. They are briefing senior management next week and should have an answer next week. Please feel free to reach out to them as I will be on vacation until August 14. Sindy Yun is out until August 8, 2019.

Thank you.

Jonathan Lakritz

Phone: (415) 703-1590

Email: jol@cpuc.ca.gov

From: Anita Taff-Rice <anitataffrice@earthlink.net>

Sent: Friday, July 26, 2019 4:16 PM

To: Lee, Tina <tina.lee@cpuc.ca.gov>; Aggie Hill <Hill.Aggie@TCTelephone.net>; Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>; Yun, Cindy J. <sindy.yun@cpuc.ca.gov>

Subject: status of response on reimbursement calculation

Hi all,

I haven't received any communication about the reimbursement calculations for TC Telephone. I would really appreciate it if someone would let me know when we will hear something.

Anita

On 7/25/2019 8:30 AM, Anita Taff-Rice wrote:

All,

I discovered I may have had some emails that did not come through yesterday, so I wanted to reach out again to confirm that you all received the documents and legal analysis on the Lifeline reimbursement issue. Also, if anyone had questions that were sent by email yesterday, would you please resend?

Finally, would someone please confirm that a decision will be made by tomorrow, and how that will be communicated?

Thanks, Anita

On 7/22/2019 5:24 PM, Anita Taff-Rice wrote:

The power point analysis is attached to this email. I researched sending the files through Kiteworks, and I will need someone from the Commission to send me a link that I can use to upload files.

I'm happy to do that, but for now, you have all of the materials.

Thanks, Anita

On 7/22/2019 4:50 PM, Anita Taff-Rice wrote:

All,

I got an out of office message from Tina, so I wasn't able to get instructions on uploading documents. I wanted to get everything to you as quickly as possible, so I will

send documents in a series of emails and then try to upload to kiteworks. We will be sending the following:

- 1) Legal analysis supporting reimbursement calculations on a per-minute basis [attached]
- 2) List of TCT service plans with description of features and rates [attached]
- 3) Confidential power point analysis of TCT's costs to provide Lifeline services based on the allowable costs in General Order 153
- 4) Confidential copies of contracts of vendors from whom we purchase local service for resale to Lifeline customers [attached]
- 5) Confidentiality declaration from Ian Costello [attached]

After you have had the chance to review these materials -- particularly the legal analysis -- I would appreciate the opportunity to discuss it with you prior to a final decision on how to calculate reimbursements from April forward. I would also appreciate confirmation that a decision will be made by Friday (7/26) as we discussed at our meeting on July 11.

Thanks, Anita

On 7/17/2019 12:47 PM, Anita Taff-Rice wrote:

Hi Tina,

We are compiling the documents requested during our meeting, and we anticipate being able to provide them tomorrow. I was planning to email the documents, but if that doesn't work, I'll try to use the secure FTP server if you give me instructions -- is that the Kiteworks system?

Just to be clear, the documents we will be providing tomorrow are vendor agreements with our underlying carriers for the services we purchase for resale to Lifeline customers, documentation of our costs, and a list of service plans that TCT offers to customers.

When you mention customer bills, do you mean TCT's bills to its customers? If yes, I don't recall discussing providing those, so I assume this new request relates to CD's interest in better understanding TCT's operations generally. Aggie tells me that we submitted some customer invoices to you last year. Could you review those?

Thanks, Anita

On 7/16/2019 4:47 PM, Lee, Tina wrote:

Hi Aggie,

Per our conversation from the July 11th meeting. We requested the Wholesale Contract and samples of customer bills. Please email the documents through the secured CPUC FTP server. Please submit the documents by Wednesday 7/24/2019.

Thank you
~Tina

--

iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--

Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--

iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--

Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597

(415) 699-7885

--

Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--

Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

ATTACHMENT 7

Time Sensitive - immediate assistance needed on Lifeline reimbursement

July 29, 2019

----- Forwarded Message -----

Subject:Time Sensitive - immediate assistance needed on Lifeline reimbursement

Date:Mon, 29 Jul 2019 08:45:36 -0700

From:Anita Taff-Rice <anitataffrice@earthlink.net>

To:Mickiewicz, Helen M. <helen.mickiewicz@cpuc.ca.gov>, Cynthia Walker <CIW@cpuc.ca.gov>

Helen and Cynthia,

As you will see from the email below, Jonathan Lakritz has been looking into whether the reimbursement calculation methodology for Lifeline service in GO 153 should be changed for TC Telephone. We've been working through this issue with him for seven weeks now, and although he tried his best, Jonathan wasn't able to finish this project before he left for two and a half weeks of vacation. Sindy Yun has also been working on this matter, but unfortunately, she too is on vacation. I understand from her that Helen is covering during her absence, hence my follow up with both of you.

The basic issue is that TC Telephone's reimbursement for Measured Rate Lifeline services have been calculated for the last six years on a per-minute basis. So, for the first 60 calls in a month, TC Telephone requested, and received, its per-minute tariffed rate for all minutes of use (MOU) for those calls (calls 61+ were reimbursed on a per-minute basis for the difference between the mandated rate for Lifeline customers (\$0.08 per MOU) and TC Telephone's tariffed rate). This, of course, mirrors the per-minute charges that TC Telephone pays to its underlying carriers, and therefore is consistent with the provisions of GO 153 that Lifeline carriers are reimbursed for their lost revenue (i.e. the rate they would have received if they were serving non-Lifeline customers).

Beginning with TC Telephone's April invoice, however, Jonathan determined that reimbursing TC Telephone on a per-minute basis might not be correct and instructed Tina to withhold all usage reimbursement while he determined whether there was a problem with his prior advice (see attached email). This resulted in approximately an 80 percent reduction in reimbursement to TC Telephone. Apparently the trigger for this unexpected re-look at the reimbursement calculation was an inquiry from the California Department of Finance about various CPUC programs, including Lifeline reimbursements. Jonathan told me during a meeting that neither the Department of Finance, nor anyone at the CPUC has determined that the per-minute reimbursements were incorrect, or instructed him to revise the calculation methodology. So TC Telephone strongly believes that the same methodology that has been used for the past six years should remain in place unless or until a formal determination from the CPUC concludes that TC Telephone should be reimbursed differently. As I understand it, the alternative reimbursement calculation Jonathan is considering instituting would reimburse TC Telephone on per-call basis (i.e. TC Telephone would be reimbursed only its tariffed rate x the number of calls, not the number of minutes).

TC Telephone is a very small company and does not have the financial reserves to withstand an 80 percent reduction in its monthly revenues, and at this point, it is in a serious financial situation since it has not been reimbursed for Lifeline services for the past 3 months (April, May, June). It has begun to lay off workers and its future viability is in doubt. Needless to say, this matter has become urgent and we really can't wait until Jonathan returns from vacation for resolution. While I completely understand that staff needs sufficient time to do its analysis and ensure that the Lifeline program is being run consistent with GO 153, TC Telephone respectfully submits that its reimbursement calculations should continue as they have been done for the past six years while this analysis is undertaken. I researched the issue, and it seems clear in my view that Jonathan's analysis and instructions were consistent with GO 153, CPUC orders and policies. For your convenience, I am attaching the analysis I did and provided to . If however, staff believes there is no clear authority that reimbursements should be on a per-call rather than a per-minute basis, it is likely that a formal CPUC decision clarifying GO 153 will be required. I think we are all aware of the resource constraints at the CPUC right now and I expect that any such clarification would take several months, or perhaps even a year.

I understand you may need to speak to Tina or other staff to get up to speed on this issue, but I am requesting a meeting as soon as possible -- preferably today or tomorrow. My concern is that the analysis may take longer than another week, and then I'm told it will take a couple of weeks to have a check sent out. At that point, we will be 10 weeks out and TC Telephone will be in serious jeopardy of having to exit the market. There seems to be a practical and fair solution -- continue using the calculation methodology for April, May and June that has been in place for six years while staff continues to analyze whether there has been an error. We would also request your assistance in getting the April reimbursement check expedited.

Please let me know at your earliest convenience when we can meet. This is my top priority for the week, so I will clear my schedule and make myself available any time you can meet.

Thanks, Anita

----- Forwarded Message -----

Subject:RE: status of response on reimbursement calculation

Date:Sat, 27 Jul 2019 00:35:57 +0000

From:Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>

To:Anita Taff-Rice <anitataffrice@earthlink.net>, Lee, Tina <tina.lee@cpuc.ca.gov>, Aggie Hill <Hill.Aggie@TCTelephone.net>, Yun, Cindy J. <sindy.yun@cpuc.ca.gov>, Sellden, You-Young (Clover) <You-Young.Sellden@cpuc.ca.gov>

Hi Anita,

I am sorry we have not reached out to you sooner. We were working diligently to wrap up our answer today, but alas that is not going to happen. Clover is taking lead on this with Tina. They are briefing senior management next week and should have an answer next week. Please feel free to reach out to them as I will be on vacation until August 14. Cindy Yun is out until August 8, 2019.

Thank you.

Jonathan Lakritz

Phone: (415) 703-1590
Email: jol@cpuc.ca.gov

From: Anita Taff-Rice <anitataffrice@earthlink.net>

Sent: Friday, July 26, 2019 4:16 PM

To: Lee, Tina <tina.lee@cpuc.ca.gov>; Aggie Hill <Hill.Aggie@TCTelephone.net>; Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>; Yun, Sindy J. <sindy.yun@cpuc.ca.gov>

Subject: status of response on reimbursement calculation

Hi all,

I haven't received any communication about the reimbursement calculations for TC Telephone. I would really appreciate it if someone would let me know when we will hear something.

Anita

On 7/25/2019 8:30 AM, Anita Taff-Rice wrote:

All,

I discovered I may have had some emails that did not come through yesterday, so I wanted to reach out again to confirm that you all received the documents and legal analysis on the Lifeline reimbursement issue. Also, if anyone had questions that were sent by email yesterday, would you please resend?

Finally, would someone please confirm that a decision will be made by tomorrow, and how that will be communicated?

Thanks, Anita

On 7/22/2019 5:24 PM, Anita Taff-Rice wrote:

The power point analysis is attached to this email. I researched sending the files through Kiteworks, and I will need someone from the Commission to send me a link that I can use to upload files.

I'm happy to do that, but for now, you have all of the materials.

Thanks, Anita

On 7/22/2019 4:50 PM, Anita Taff-Rice wrote:

All,

I got an out of office message from Tina, so I wasn't able to get instructions on uploading documents. I wanted to get everything to you as quickly as possible, so I will send documents in a series of emails and then try to upload to kiteworks. We will be sending the following:

1) Legal analysis supporting reimbursement calculations on a per-minute basis [attached]

2)List of TCT service plans with description of features and rates [attached]

3)Confidential power point analysis of TCT's costs to provide Lifeline services based on the allowable costs in General Order 153

4) Confidential copies of contracts of vendors from whom we purchase local service for resale to Lifeline customers [attached]

5) Confidentiality declaration from Ian Costello [attached]

After you have had the chance to review these materials -- particularly the legal analysis -- I would appreciate the opportunity to discuss it with you prior to a final decision on how to calculate reimbursements from April forward. I would also appreciate confirmation that a decision will be made by Friday (7/26) as we discussed at our meeting on July 11.

Thanks, Anita

On 7/17/2019 12:47 PM, Anita Taff-Rice wrote:

Hi Tina,

We are compiling the documents requested during our meeting, and we anticipate being able to provide them tomorrow. I was planning to email the documents, but if that doesn't work, I'll try to use the secure FTP server if you give me instructions -- is that the Kiteworks system?

Just to be clear, the documents we will be providing tomorrow are vendor agreements with our underlying carriers for the services we purchase for resell to Lifeline customers, documentation of our costs, and a list of service plans that TCT offers to customers.

When you mention customer bills, do you mean TCT's bills to its customers? If yes, I don't recall discussing providing those, so I assume this new request relates to CD's interest in better understanding TCT's operations generally. Aggie tells me that we submitted some customer invoices to you last year. Could you review those?

Thanks, Anita

On 7/16/2019 4:47 PM, Lee, Tina wrote:

Hi Aggie,

Per our conversation from the July 11th meeting. We requested the Wholesale

Contract and samples of customer bills. Please email the documents through the secured CPUC FTP server. Please submit the documents by Wednesday 7/24/2019.

Thank you
~Tina

--

iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--
Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--

iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--
Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--
Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

COMMISSION AND STATUTORY SUPPORT FOR PER-MINUTE REIMBURSEMENT FOR MEASURED RATE LIFELINE SERVICE

D.00-10-028

- D.00-10-028 held that “[u]tilities are able to recover from the ULTS Fund their costs to provide ULTS, including the difference between each utility’s normal tariffed rates for basic service and the discounted rates charged to customers participating in the ULTS program.” D.00-10-028, at p. 4.
- TCT charges non-Lifeline customers \$0.20 per minute even though its tariff allows it to charge \$0.23 [TCT Advice Letter 52]
- Therefore, pursuant to D.00-10-028, TCT is allowed to seek reimbursement of \$0.20 (the utility’s normal tariffed rates for basic service) minus \$0.00 (the discounted rates charged to customers for the first 60 calls in a month) and \$0.12 per minute for calls 61 and above in a month (tariffed rate - \$0.08 per minute charged for calls 61 and above)

GO 153

1. Definition of Measured Rate Service

GO 153 defines Measured Rate service as “Local telephone service satisfying the requirements of Basic Residential Telephone Service for which there is a **usage-based charge** for some or all local calls.” (emphasis added) GO 153, Section 2.35.

- A usage-based charge means a per-minute charge; TCT charges for measured rate services on a per-minute basis pursuant to its tariff.
- TCT forgives the per-minute charges for the first 60 calls for LL customers due to GO 153, but it should be allowed to seek reimbursement under the same rate structure as its charges are assessed (per minute)

2. Lost revenues

- GO 153 was revised to incorporate the results of D.00-10-028 to “(1) allow every utility to recover from the ULTS Fund the lost revenues it incurs to provide 60 untimed local calls per month to ULTS measured service customers to the extent that the utility does not recover these lost revenues any other sources”
- TCT’s lost revenues are calculated by taking the rate structure and charges in its tariff for non-LifeLine (“LL”) residential customers. TCT’s measured rate plan is explicitly a per-minute plan.
- TCT loses \$0.20 per minute for the first 60 calls made by LL customers (\$0.00 for 1-60 calls each month) and \$0.12 per minute for 61+ calls each month (\$0.20-\$0.08 = \$0.12)
- TCT incurs costs on a per-minute basis to buy and resell service to Lifeline customers, which validates that TCT should be reimbursed on a per-minute basis. TCT is submitting a set of power point slides identifying the costs it incurs to provide LL service, for which

reimbursement is expressly allowed in General Order 153, as a secondary validation of its lost revenues.

3. Use of term “call” and prior Commission definitions

- GO 153 allows for reimbursement for lost revenues for LL “calls”; early CPUC orders defining calls indicated that “telephone service is functionally divided into two underlying components, access and usage.” D. 93-09-076, 1993 Cal. PUC LEXIS 649, at *51 (Sept. 17, 1993)
- GO 153 also makes a distinction between “access to (a) single party local exchange service” (connection to the PSTN) and “the ability to place calls.” GO 153, Appendix A, (Description of elements required to be offered as part of Lifeline service). The use of the term “calls” in the service element description clearly refers to “calls” as usage (the ability to engage in communications on a local basis).
 - Usage under a measured rate Lifeline plan is “measured” on a per-minute basis. Therefore, the statement in GO 153 that carriers are allowed to recover lost revenues for “60 untimed local calls per month” refers to the number of minutes associated with 60 calls, not 60 connections.
 - If GO 153 has intended to allow reimbursement only for 60 free connections per month, it would have either used the term “connection” or “access” or “per call” but instead used the term “calls”

Public Utilities Code

- Pub. Util. Code § 871.5(d) requires the Commission to implement and administer the Lifeline program “in a way that is equitable, nondiscriminatory, and without competitive consequences for the telecommunications industry in California.”
 - Reversing the reimbursement calculation methodology after six years and with no notice is not equitable
 - Reversing the reimbursement calculation to a per-connection basis rather than per-minute will reduce TCT’s revenue by approximately 80 percent and thereby drive it from the marketplace, which is directly contrary to the mandate to administer the Lifeline program in a manner that is “without competitive consequences.”

Policy and Other Justifications for a Per-minute Reimbursement

- **Certainty about recovery of LL costs.** Carriers should have a reasonable degree of certainty about what costs it may or may not recover from the ULTS Fund. D.00-10-028, at p.109. Reversing the reimbursement calculation methodology after six years and with no notice would be fundamentally unfair and contrary to providing TCT a reasonable degree of certainty about the costs it may or may not recover.
- **No financial disincentive for LL providers.** Commission wishes to avoid results that would create a financial disincentive for utilities to serve ULTS customers and thereby (1) undermine our goal of fostering competition in the provision of ULTS, and

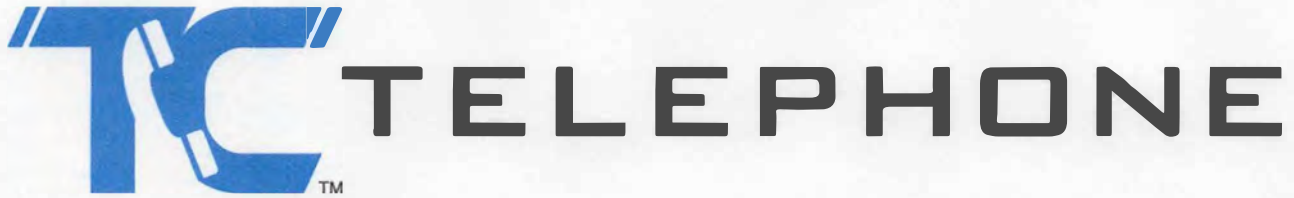
(2) threaten the fundamental purpose of the ULTS program of providing affordable telephone service to low-income households. D.00-10-028, at p. 111-112.

- Reversing the calculation methodology to a per-unit flat rate reimbursement would result in a loss of approximately 80 percent of TCT's monthly revenues and will cause the company to go out of business. This is directly contrary to the Commission's stated commitment to avoid results that create a financial disincentive for carriers to serve LL customers.
 - TCT must pay its underlying carrier on a per-minute basis for the first 60 untimed calls, so it must have some mechanism to recover those costs
- **Substantive changes to LL reimbursement require official Commission action.** Any substantive change to the LL program will be made "only through Commission decisions and resolutions, and only after parties have had notice and an opportunity to comment and/or request evidentiary hearings on proposed substantive changes. . . . Commission staff may initiate substantive changes using the resolution process (e.g., annual resolutions revising the ULTS surcharge rate)." D.00-10-028, at p. 181.
 - The definition of "substantive change" includes "the amount and types of costs and lost revenues that utilities may recover from the ULTS Fund." D.00-10-028, at p. 181-182.
 - Revising the reimbursement calculation methodology to deny 80% of TCT's request is a substantive change (i.e. may TCT recover per unit or per minute costs for calls 1-60) and may be done only through a Commission decision or resolution. Therefore, CD staff should continue to process TCT's reimbursement requests as it has done for six years unless or until the Commission issues a resolution or decision changing reimbursement to a per-unit basis.
 - **Driving TCT from the market would undermine LL competition.** If CD does not devise a way to reimburse TCT for all of its lost revenues, TCT will be financially harmed so severely it likely will have to exit the market in direct contravention of the Commission's goals in D.00-10-028 to foster competition for provision of LL and to not create financial disincentives for utilities to serve LL customers. D.00-10-028, at p. 7.
 - **Revising TCT's reimbursement to per-unit flat rate rather than per-minute is not competitively neutral.** If CD does not apply the same reimbursement methodology to all carriers, it will cause TCT competitive harm in direct contravention of the Commission's mandate in D.00-10-028 to manage the LL fund in a competitively neutral manner
 - If staff processed other carrier requests for reimbursement of measured rate LL service on a per-minute basis at any point in time, staff must do the same for TCT in order to be competitively neutral

ATTACHMENT 8

Letter to the CPUC

August 06, 2019



Ms. Tina Lee
Mr. Jonathan Lakritz
California Public Utilities Commission
Communications Division
505 Van Ness Avenue
San Francisco, CA 94102

SENT VIA EMAIL

August 6, 2019

Dear Tina and Jonathan,

Attached to this letter via email, you will find the July 2019 CPUC Wireline Claim File for TC Telephone. As we are still awaiting direction from the Communications Division as to the preferred format for claiming untimed calls on the monthly claim file, we have submitted the untimed calls portion by the quantity of calls calculation and listed the additional monies that make up the quantity of minutes as Lost Revenue.

We look forward to gaining direction from the Communications Division on this matter so that there may be a true resolve.

Regards,

A handwritten signature in black ink that reads 'Aggie Hill'. The signature is written in a cursive, flowing style.

Aggie Hill

Operations Manager

TC Telephone, LLC

CC: Anita Taff-Rice

ATTACHMENT 9

VERY TIME SENSITIVE - Re: process for proceeding with reimbursements for TC Telephone

August 07, 2019

----- Forwarded Message -----

Subject:VERY TIME SENSITIVE - Re: process for proceeding with reimbursements for TC Telephone

Date:Wed, 7 Aug 2019 10:50:53 -0700

From:Anita Taff-Rice <anita@icommlaw.com>

To:Lee, Tina <tina.lee@cpuc.ca.gov>, Walker, Cynthia <cynthia.walker@cpuc.ca.gov>, Mickiewicz, Helen M. <helen.mickiewicz@cpuc.ca.gov>

CC:Aggie Hill <Hill.Aggie@TCTelephone.net>

Hi Tina,

I'm following up to find out when the payment letters will be sent to our factoring company (Aegis). When you mentioned that the letters needed management signature, I assumed you meant Cynthia, but just wanted to confirm that we aren't waiting for Jonathan to return to sign them. If that's the case, we have a severe problem.

The way the process works with Aegis is that it advances us the Lifeline reimbursement amount minus an administrative fee and we use that money for operations. Aegis already funded us for April and May, and is very anxious about getting the Lifeline reimbursement from the CPUC. We forwarded your email below to Aegis but that is not sufficient for them to feel comfortable that the CPUC will send out the full April and May payments, much less the next two months.

Given the uncertainty about whether the Commission will reimburse fully, Aegis has not advanced us payment for June and this morning Aegis informed TC Telephone that it will not advance payment for July. So at this point, TC Telephone has received no revenue for four months and it is serious financial jeopardy. The company has already laid off 21 employees and more lay offs will occur this week if we aren't able to give Aegis a level of comfort that the payment letters will be sent immediately and that a plan is in place for future reimbursements. These lay offs have largely been in marketing and other administrative positions, but the next round will be operations and customer support, which will undoubtedly affect the quality of service for customers.

I'm sorry this is all happening while Jonathan is out of the office, but since this issue didn't get resolved before he left, I am asking for help from Cynthia and Helen. It is my honest belief that if we wait until Jonathan returns (August 14 according to his out of office message) TC Telephone will no longer be financially viable and will have to wind down operations.

I would greatly appreciate it if we could have a short call today to discuss what can be done to address this problem.

Thanks, Anita

On 8/2/2019 11:56 AM, Lee, Tina wrote:

Hi Anita,

Management has decided to approve the April 2019 untimed call amount of \$456,811.38 and May 2019 claim amount of \$634,346.86. I am currently waiting for management's signature on the payment letters.

~Tina

-----Original Message-----

From: Anita Taff-Rice <anita@icommlaw.com>

Sent: Tuesday, July 30, 2019 3:02 PM

To: Lee, Tina <tina.lee@cpuc.ca.gov>

Cc: Aggie Hill <Hill.Aggie@TCTelephone.net>

Subject: process for proceeding with reimbursements for TC Telephone

Hi Tina,

I understand that CD will be sending a letter stating that it will proceed with reimbursements for TC Telephone's April and May invoices using the existing calculation of per-minute charges. I also understand that it may take a few days for that to happen. In the meantime, is it possible that you could send a payment letter to our factoring company letting them know that a reimbursement for the full amount in April will be forthcoming and that CD is proceeding with the May payment and provide the amount? As I mentioned in our meeting, things are pretty dire financially at TCT right now, so any assurances you could give to the factoring company short of getting an actual check to them would be tremendously helpful.

If I should be following up with someone else on this, please let em know.

Thanks, Anita

--

iCommLaw

1547 Palos Verdes, #298

Walnut Creek, CA 94597

(415) 699-7885

--

iCommLaw

1547 Palos Verdes, #298

Walnut Creek, CA 94597

(415) 699-7885

ATTACHMENT 10

RE: URGENT further assistance needed re TCT reimbursement

August 09, 2019

----- Forwarded Message -----

Subject:RE: URGENT further assistance needed re TCT reimbursement

Date:Fri, 9 Aug 2019 22:49:57 +0000

From:Wullenjohn, Robert J. <robert.wullenjohn@cpuc.ca.gov>

To:Anita Taff-Rice <anitataffrice@earthlink.net>, Adam.James@TCTelephone.net
<Adam.James@TCTelephone.net>

CC:Filler, Lucian <Lucian.Filler@cpuc.ca.gov>, Sellden, You-Young (Clover) <You-Young.Sellden@cpuc.ca.gov>, Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>, Yun, Sindy J. <sindy.yun@cpuc.ca.gov>, Worster, Chari <chari.worster@cpuc.ca.gov>, Lee, Tina <tina.lee@cpuc.ca.gov>, Walker, Cynthia <cynthia.walker@cpuc.ca.gov>

Anita; Please see the attached.

Rob

From: Anita Taff-Rice <anitataffrice@earthlink.net>

Sent: Friday, August 09, 2019 10:50 AM

To: Lee, Tina <tina.lee@cpuc.ca.gov>; Wullenjohn, Robert J. <robert.wullenjohn@cpuc.ca.gov>; Walker, Cynthia <cynthia.walker@cpuc.ca.gov>; Mickiewicz, Helen M. <helen.mickiewicz@cpuc.ca.gov>

Cc: Filler, Lucian <Lucian.Filler@cpuc.ca.gov>; Sellden, You-Young (Clover) <You-Young.Sellden@cpuc.ca.gov>; Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>; Yun, Sindy J. <sindy.yun@cpuc.ca.gov>

Subject: Re: URGENT further assistance needed re TCT reimbursement

All,

I just received a troubling update this morning regarding TC Telephone's dwindling ability to operate. The company has been preserving the ability to make payroll as long as possible, but other debts are mounting that are causing the company to be unable to operate. For example, the company uses a credit account to pay for postage to mail out telephone devices to customers. That account is completely depleted and we are unable to get any additional credit. That means that there are a growing number of customers who are unable to receive service either because they are new customers and lack a device, or they are existing customers whose device has malfunctioned and they can't get a replacement. Not only is this a problem for the customer, but we are very concerned that customers will start filing complaints with CAB or the Lifeline Administrator or both.

To try to keep TC Telephone from going out of business, we need two things: 1) we are looking for a commitment that CD will continue to timely process and pay in full on a per-minute reimbursement for TC Telephone's invoices unless a formal decision is made that reimbursement must be done differently; and 2) we would like to talk to someone in the Fiscal Office to see if there is some way for me to pick up the checks for April and May and send them expedited (I know Tina indicated this is not routine practice, but we are at the point that Aegis does not believe anything that TC Telephone or the CPUC is telling them about payments or reimbursement calculations.

I am requesting a call today to discuss. Please let me know what time works.

Anita

On 8/8/2019 11:01 AM, Anita Taff-Rice wrote:

All,

I very much appreciate your help in getting the payment letter sent out yesterday. Unfortunately, Aegis (the factoring company) informed us that they will no longer advance funds based on payment letters. Instead they are requiring that we provide a decision on how TC Telephone's invoices will be processed going forward. Our CFO indicates that TC Telephone will be able to meet payroll on August 16, but after that date TC Telephone will be completely out of operating cash and unable to meet payroll and other obligations due on August 23. This is obviously an urgent situation and I am requesting guidance on what can be done to address the problem immediately. I understood that the ultimate decision on the calculation method would be made by Communications Division management and that Jonathan was very close to providing his recommendation. If for some reason management needs to confer with Jonathan, who I understand will be out on vacation until August 14, I am requesting that a decision on how to calculate TC Telephone's reimbursement requests will be issued to us no later than noon on August 16. I note that this is a reasonable request since TC Telephone was given absolute assurance that a decision would be issued on July 26.

I would greatly appreciate it if we can have a call today to discuss.

Thanks, Anita

On 8/7/2019 3:46 PM, Lee, Tina wrote:

Hi Anita,

The Fiscal Office informed me that they entered the 2 payments in their system and it's currently being reviewed by SCO. I will inform you when the warrant is issued by SCO. There are no options of picking up the warrant.

Thank you
~Tina

From: Anita Taff-Rice <anitataffrice@earthlink.net>

Sent: Wednesday, August 07, 2019 3:10 PM

To: Lee, Tina <tina.lee@cpuc.ca.gov>; Wullenjohn, Robert J. <robert.wullenjohn@cpuc.ca.gov>

Cc: Filler, Lucian <Lucian.Filler@cpuc.ca.gov>; Sellden, You-Young (Clover) <[You-](#)

Young.Sellden@cpuc.ca.gov; Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>

Subject: Re: expedited payment process

Can I have someone pick it up and send it myself?

Anita

On 8/7/2019 2:40 PM, Lee, Tina wrote:

Hi Anita,

The Fiscal Office informed me that they do not have the option to send out warrants overnight.

~Tina

From: Anita Taff-Rice <anitataffrice@earthlink.net>

Sent: Wednesday, August 07, 2019 2:09 PM

To: Lee, Tina <tina.lee@cpuc.ca.gov>; Wullenjohn, Robert J. <robert.wullenjohn@cpuc.ca.gov>

Cc: Filler, Lucian <Lucian.Filler@cpuc.ca.gov>; Sellden, You-Young (Clover) <You-Young.Sellden@cpuc.ca.gov>; Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>

Subject: expedited payment process

Do you think they will be able to get the check sent out by the 14th? We would greatly appreciate it if the check could be sent via overnight delivery. We can provide an account number that the Fiscal Office can use.

Thanks, Anita

On 8/7/2019 1:49 PM, Lee, Tina wrote:

Hi Anita,

Fiscal has an expedited payment process that's 7 days.

~Tina

From: Lee, Tina

Sent: Wednesday, August 07, 2019 1:18 PM

To: Anita Taff-Rice <anitataffrice@earthlink.net>; Wullenjohn, Robert J. <robert.wullenjohn@cpuc.ca.gov>

Cc: Filler, Lucian <Lucian.Filler@cpuc.ca.gov>; Sellden, You-Young (Clover) <You-Young.Sellden@cpuc.ca.gov>; Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>

Subject: RE: VERY TIME SENSITIVE - Re: process for proceeding with reimbursements for TC Telephone

Hi Anita,

I will work with our Fiscal Office and see if there are other options that can expedite the payment faster from SCO.

~Tina

From: Anita Taff-Rice <anitataffrice@earthlink.net>

Sent: Wednesday, August 07, 2019 1:11 PM

To: Wullenjohn, Robert J.

<robert.wullenjohn@cpuc.ca.gov>

Cc: Filler, Lucian <Lucian.Filler@cpuc.ca.gov>; Sellden,

You-Young (Clover) <You-Young.Sellden@cpuc.ca.gov>;

Lee, Tina <tina.lee@cpuc.ca.gov>; Lakritz, Jonathan

<jonathan.lakritz@cpuc.ca.gov>

Subject: Re: VERY TIME SENSITIVE - Re: process for proceeding with reimbursements for TC Telephone

Rob,

I sincerely appreciate your assistance. Tina mentioned it's possible to ask for expedited treatment for the payments. Is there anything that can be done to make sure the payment is no longer than 5 days?

Anita

On 8/7/2019 12:28 PM, Wullenjohn, Robert J. wrote:

Hi Anita; Attached is a copy of the approval letter, which will be mailed today. I understand it may take 5-10 days for fiscal to process the payment. On behalf of the Commission, I apologize for our delay in not responding sooner. It is my goal that we provide superior customer service.

Thank you,

Robert Wullenjohn
Manager, Broadband, Video and Market
Branch
Communications Division
California Public Utilities Commission
415-703-2265

From: Wullenjohn, Robert J.

Sent: Wednesday, August 07, 2019
11:39 AM

To: Anita Taff-Rice
<anitataffrice@earthlink.net>
Cc: Filler, Lucian
<Lucian.Filler@cpuc.ca.gov>
Subject: RE: VERY TIME SENSITIVE - Re:
process for proceeding with
reimbursements for TC Telephone

Hi Anita; I am following up with CD
staff regarding this matter and will get
back to you later today. I understand
the urgency from TC Telephone's
perspective.

Robert Wullenjohn
Manager, Broadband, Video and Market
Branch
Communications Division
California Public Utilities Commission
415-703-2265

From: Anita Taff-Rice
<anitataffrice@earthlink.net>
Sent: Wednesday, August 07, 2019
11:02 AM
To: Wullenjohn, Robert J.
<robert.wullenjohn@cpuc.ca.gov>
Subject: Fwd: VERY TIME SENSITIVE -
Re: process for proceeding with
reimbursements for TC Telephone

Hi Rob,

I just sent the email below to Cynthia
Walker and got an out of office
message indicating her correspondence
should be directed to you. I'm not sure
if you're aware of this issue, so I'm
attaching an email I sent to Cynthia and
Helen Mickiewicz recently explaining
the situation. I'd be happy to have a
call to discuss. I'd really appreciate it if
you could provide assistance.

Thanks, Anita

----- Forwarded Message -----

Subject: VERY TIME SENSITIVE - Re: process for proceeding with reimbursements for TC T

Date:Wed, 7 Aug 2019 10:50:53 -0700

From:Anita Taff-Rice <anita@icommlaw.com>

To:Lee, Tina <tina.lee@cpuc.ca.gov>, Walker, Cynthia <cynthia.walker@cpuc.ca.gov>
<helen.mickiewicz@cpuc.ca.gov>

CC:Aggie Hill <Hill.Aggie@TCTelephone.net>

Hi Tina,

I'm following up to find out when the payment letters will be sent to our factoring company (Aegis). When you mentioned that the letters needed management signature, I assumed you meant Cynthia, but just wanted to confirm that we aren't waiting for Jonathan to return to sign them. If that's the case, we have a severe problem.

The way the process works with Aegis is that it advances us the Lifeline reimbursement amount minus an administrative fee and we use that money for operations. Aegis already funded us for April and May, and is very anxious about getting the Lifeline reimbursement from the CPUC. We forwarded your email below to Aegis but that is not sufficient for them to feel comfortable that the CPUC will send out the full April and May payments, much less the next two months.

Given the uncertainty about whether the Commission will reimburse fully, Aegis has not advanced us payment for June and this morning Aegis informed TC Telephone that it will not advance payment for July. So at this point, TC Telephone has received no revenue for four months and it is serious financial jeopardy. The company has already laid off 21 employees and more lay offs will occur this week if we aren't able to give Aegis a level of comfort that the payment letters will be sent immediately and that a plan is in place for future reimbursements. These lay offs have largely been in marketing and other administrative positions, but the

next round will be operations and customer support, which will undoubtedly affect the quality of service for customers.

I'm sorry this is all happening while Jonathan is out of the office, but since this issue didn't get resolved before he left, I am asking for help from Cynthia and Helen. It is my honest belief that if we wait until Jonathan returns (August 14 according to his out of office message) TC Telephone will no longer be financially viable and will have to wind down operations.

I would greatly appreciate it if we could have a short call today to discuss what can be done to address this problem.

Thanks, Anita

On 8/2/2019 11:56 AM, Lee, Tina wrote:

Hi Anita,

Management has decided to approve the April 2019 untimed call amount of \$456,811.38 and May 2019 claim amount of \$634,346.86. I am currently waiting for management's signature on the payment letters.

~Tina

-----Original Message-----

-

From: Anita Taff-Rice
<anita@icommlaw.com

>

Sent: Tuesday, July 30, 2019 3:02 PM

To: Lee, Tina
<tina.lee@cpuc.ca.gov

Cc: Aggie Hill
<Hill.Aggie@TCTelepho

[ne.net>](#)

Subject: process for
proceeding with
reimbursements for TC
Telephone

Hi Tina,

I understand that CD
will be sending a letter
stating that it will
proceed with
reimbursements for TC
Telephone's April and
May invoices using the
existing calculation of
per-minute charges. I
also understand that it
may take a few days for
that to happen. In the
meantime, is it possible
that you could send a
payment letter to our
factoring company
letting them know that
a reimbursement for
the full amount in April
will be forthcoming and
that CD is proceeding
with the May payment
and provide the
amount? As I
mentioned in our
meeting, things are
pretty dire financially at
TCT right now, so any
assurances you could
give to the factoring
company short of
getting an actual check
to them would be
tremendously helpful.

If I should be following
up with someone else
on this, please let em
know.

Thanks, Anita

--

iCommLaw
1547 Palos Verdes,
#298
Walnut Creek, CA
94597
(415) 699-7885

--

iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--
Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--
Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--
Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--
Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

--
Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 9, 2019

James Adam, Manager
Via Email: Adam.James@TCTelephone.net

TC Telephone LLC, U-6875-C
P.O. Box 628274
Orlando, FL 32862

SUBJECT: California LifeLine Claims Process

Dear Mr. Adam:

I wish to inform you that the Communications Division (CD) will continue to review in a timely manner the invoices TC Telephone submits to the CPUC for reimbursement of LifeLine subsidy amounts. In addition, CD will process payments to the Company on a per-minute basis until the Commission addresses in a public process the question of whether an alternative basis should be used. We are informed by the State Controller's Office that TC Telephone should receive the subsidy payments of April and May next week.

Sincerely yours;

RW1

Robert Wullenjohn
Manager, Broadband, Video and Market Branch
Communications Division
California Public Utilities Commission

415-703-2265

Cc; Jonathan Lakritz
Sindy Yun
Anita Taff-Rice

ATTACHMENT 11

Re: Read: Re: URGENT further assistance needed re TCT reimbursement

August 09, 2019

----- Forwarded Message -----

Subject:Re: Read: Re: URGENT further assistance needed re TCT reimbursement

Date:Fri, 9 Aug 2019 12:11:04 -0700

From:Anita Taff-Rice <anitataffrice@earthlink.net>

To:Mickiewicz, Helen M. <helen.mickiewicz@cpuc.ca.gov>

Helen,

I just saw this return receipt, so I wanted to give you an update. I spoke to Rob Wullenjohn and explained that it is crucial for us to give the factoring company some confidence that TC Telephone will be receiving reimbursements -- this is as important as the actual checks since the April and May checks are covering advances that Aegis already made. They are looking for confirmation about future reimbursements.

Rob agreed that reimbursements ought to continue to be calculated as they have been unless or until the Commission makes a formal decision to handle reimbursements differently. He said he was willing to write a brief letter stating this and just wanted to check with legal, which I assume is either you or Sindy. Given the severe loss of revenue, it is essential to get the letter today rather than waiting until Jonathan returns. I do not think Jonathan would see it differently -- i.e. the status quo should continue unless a formal change is made -- but he won't be back until the 14th. TC Telephone really needs to get a letter to the factoring company today to get them to consider even a partial advance for June and July. Anything you can do to help would be greatly appreciated.

Anita

On 8/9/2019 11:48 AM, Mickiewicz, Helen M. wrote:

Your message

To: Mickiewicz, Helen M.

Subject: Re: URGENT further assistance needed re TCT reimbursement

Sent: Friday, August 9, 2019 10:50:27 AM (UTC-08:00) Pacific Time (US & Canada)

was read on Friday, August 9, 2019 11:48:17 AM (UTC-08:00) Pacific Time (US & Canada).

Final-recipient: RFC822; helen.mickiewicz@cpuc.ca.gov
Disposition: automatic-action/MDN-sent-automatically; displayed
X-MSEch-Correlation-Key: Vy4+vY596Em/IbJGOxfXF8A==
Original-Message-ID: <4621c74f-ca58-ad7b-a0a3-be3bf643d260@earthlink.net>
X-Display-Name: Mickiewicz, Helen M.

--

Anita Taff-Rice
iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

ATTACHMENT 12

RE: TC Telephone July 2019 CPUC Claim File

August 13, 2019

From: Aggie Hill
Sent: Tuesday, August 13, 2019 1:08 PM
To: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: Aggie Hill <Hill.Aggie@tctelephone.net>
Subject: RE: TC Telephone July 2019 CPUC Claim File

Hi Tina,
Please find attached the June 2019 and July 2019 claim filings with the original untimed calls calculation as we have been doing these past few years.

Can you please help me understand what we can expect as your email indicated they would be “expedited”? Any information you can provide regarding what that timeframe typically looks like would be most helpful.

Thank you in advance,



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

From: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Sent: Tuesday, August 13, 2019 11:44 AM
To: Aggie Hill <Hill.Aggie@TCTelephone.net>; lifelineclaim <lifelineclaim@cpuc.ca.gov>
Subject: RE: TC Telephone July 2019 CPUC Claim File

Hi Aggie,

Please submit the June and July 2019 claim with the Untimed Call calculation instructions that TC Telephone previously were following. We will continue to approve this until the Commission has a resolution. The June and July 2019 claims will be expedited.

Thank you
~Tina

From: Aggie Hill <Hill.Aggie@TCTelephone.net>
Sent: Tuesday, August 06, 2019 2:24 PM
To: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Cc: Invoices <invoices@aegisbusinesscredit.com>
Subject: TC Telephone July 2019 CPUC Claim File

Good afternoon Tina,
Please find attached the July 2019 CPUC claim file for TC Telephone.
Please confirm receipt at your earliest convenience.

Thank you!



Aggie Hill
Operations Manager
TC Telephone
243 Washington Street
Red Bluff, California 96080
Mobile: 256-504-0696

ATTACHMENT 13

Difficulties with mass transfer of Lifeline customer

March 24, 2020

----- Forwarded Message -----

Subject:Difficulties with mass transfer of Lifeline customers

Date:Tue, 24 Mar 2020 09:57:30 -0700

From:Anita Taff-Rice <anita@icommlaw.com>

To:Osborn, Robert B. <robert.osborn@cpuc.ca.gov>, jonathan.koltz@cpuc.ca.gov, travis.foss@cpuc.ca.gov,
jonathan.lakritz@cpuc.ca.gov, chari.worster@cpuc.ca.gov, michael.mullaney@cpuc.ca.gov,
shannon.O'Rourke@cpuc.ca.gov, leuwam.tesfai@cpuc.ca.gov, terence.shia@cpuc.ca.gov,
lester.wong@cpuc.ca.gov, sandy.goldberg@cpuc.ca.gov

All,

Late yesterday I saw the revisions to Resolution T-17687, which still recommends approving the rule change for reimbursements to Lifeline. It indicated that TC Telephone should utilize the mass migration rules to transfer its customers if it is forced out of business due to the revised reimbursement methodology.

Given the situation with the Covid-19 crisis, I wanted to let you know that upon initial review, I do not believe it is possible to mass transfer Lifeline customers in the same way as other customers because Lifeline customers must be qualified as eligible. I believe the receiving carrier would be required to qualify the customers prior to actually accepting them, or take a risk for several months that the customers will qualify as eligible until the verification process is completed.

As I mentioned in my letter yesterday, TC Telephone has approximately 10,000 customers either on board, in the process of on boarding or renewing. TC Telephone is gravely concerned that no carrier would be able or willing to accept so many customers all at once if it must cease operations.

Regardless of your view of the merits of the rule change proposed in Resolution T-17687, I hope you would agree that this is not the time to take actions that could disrupt service for vulnerable customers. TC Telephone respectfully requests that a hold be placed on the resolution until after the Covid-19 crisis has passed, or that the resolution be withdrawn and the reimbursement calculation method be taken up in R.20-02-008.

Thank you,

Anita

On 3/23/2020 2:20 PM, Anita Taff-Rice wrote:

Commissioners,

Given customers' dependence on communications services during the Covid-19 statewide stay-at-home order, TC Telephone believes it is important to provide you with an update on the way in which Resolution T-17687 will affect its operations if the resolution is approved at the meeting on Thursday.

We are very appreciative of the time that your offices have already given TC Telephone during our meetings or phone calls this month, and we know things are very hectic for everyone. But we ask that you take a few minutes to read the attached letter so that a fully informed decision can be made about the draft resolution.

Should you have any questions or require additional information, please don't hesitate to contact me.

Thank you,

Anita

--

iCommLaw
1547 Palos Verdes, #298
Walnut Creek, CA 94597
(415) 699-7885

ATTACHMENT 14

RE: Resolution T-17687 - TC Telephone ULTS Claims

June 19, 2020

From: Worster, Chari <chari.worster@cpuc.ca.gov>
Sent: Friday, June 19, 2020 3:11 PM
To: Iqbal, Sophia
Cc: Lee, Tina
Subject: RE: Resolution T-17687 - TC Telephone ULTS Claims

Yes – March is normal. But reject April on.

From: Iqbal, Sophia <Sophia.Iqbal@cpuc.ca.gov>
Sent: Friday, June 19, 2020 11:50 AM
To: Worster, Chari <chari.worster@cpuc.ca.gov>
Cc: Lee, Tina <tina.lee@cpuc.ca.gov>
Subject: FW: Resolution T-17687 - TC Telephone ULTS Claims

Hi Chari,
I just emailed Aggie Hill from TC Telephone. See my email below. The resolution comes into effect in April, so should I process March like I normally do? It's for \$1.2 Million! I have written out what they have claimed in 2020 below.

Thank you,

Sophia Iqbal

TC Telephone 2020 Claim Totals		
	Total	Line 9
January	\$ 849,780.82	\$ 692,093.19
February	\$ 949,699.21	\$ 762,672.97
March	\$ 1,232,845.35	\$ 989,818.68
April	\$ 1,039,565.30	\$ 837,890.68
May	\$ 863,837.77	\$ 682,042.93

From: Iqbal, Sophia
Sent: Friday, June 19, 2020 11:38 AM
To: Aggie Hill <Hill.Aggie@TCTelephone.net>
Cc: lifelineclaim <lifelineclaim@cpuc.ca.gov>
Subject: Resolution T-17687 - TC Telephone ULTS Claims

Hello Aggie,
Per resolution T17687 (attached), where the commission clarified the rules of a per minute basis, we are not accepting you April and May 2020 claims. Please provide proof that the calls are on a per minute basis. Thank you,

Sophia Iqbal

ATTACHMENT 15

Follow up Email after call with CPUC staff
New CPUC claim form

May 22, 2020

From: Aggie Hill

Sent: Friday, May 22, 2020 6:18 PM

To: Owners <Owners@TCTelephone.net>; Anita Taff-Rice <anita@icommlaw.com>

Subject: New CPUC Claim Form

All,

I just hung up with Tina Lee. I called and asked and stated I noticed on the new claim form that for the untimed calls portion there is only a place for the 0-60, but not the 61+. I asked if this was a simple error or what the CPUC's intention is for filing the calls for 61+. She said "um....you can just add it". I confirmed that I can add it underneath the 0-60 and she said yes. She reminded me that only calls can be claimed, not minutes. I told her we are aware and that is how we filed the April claim at the beginning of May and she seemed satisfied.



Aggie Hill
Operations Manager
TC Telephone
[243 Washington Street](#)
[Red Bluff, California 96080](#)
Mobile: [256-504-0696](#)

ATTACHMENT 16

TIME SENSITIVE - TCT Amended Claim Form Incorporating Changes Based on Sworn Staff Declaration
Submitted to Court

September 15, 2020

Subject:TIME SENSITIVE - TCT Amended Claim Form Incorporating Changes Based on Sworn Staff Declaration Submitted to Court

Date:Tue, 15 Sep 2020 14:15:39 -0700

From:Anita Taff-Rice <anita@icommlaw.com>

To:Osborn, Robert B. <robert.osborn@cpuc.ca.gov>

CC:Simon, Anne <anne.simon@cpuc.ca.gov>, Batjer, Marybel <Marybel.Batjer@cpuc.ca.gov>, Shiroma, Genevieve <Genevieve.Shiroma@cpuc.ca.gov>, Cooke, Michelle <michelle.cooke@cpuc.ca.gov>, Mickiewicz, Helen M. <helen.mickiewicz@cpuc.ca.gov>, Foss, Travis <travis.foss@cpuc.ca.gov>, Filler, Lucian <Lucian.Filler@cpuc.ca.gov>, Lakritz, Jonathan <jonathan.lakritz@cpuc.ca.gov>, Worster, Chari <chari.worster@cpuc.ca.gov>, Guzman Aceves, Martha <Martha.GuzmanAceves@cpuc.ca.gov>

Mr. Osborn,

I am following up on TC Telephone's April claim for reimbursement because it appears that one of the two legal disputes has been resolved in TCT's favor. As you may know, TCT has filed a petition for writ of review of Resolution T-17687 in

appeals court and recently asked for a stay of Resolution T-17687 due to the legal disputes arising from the per-call reimbursement rules set forth in that resolution. Ms. Worster submitted a sworn declaration to the appeals Court supporting the Commission's opposition to the stay request.

In that declaration, Ms. Worster told the Court that TCT's Advice Letter 56 brought it into full compliance with Resolution T-17687. That Advice Letter provided TCT's definition of a "call" and TCT's initial April claim form relied on that definition. Staff rejected the claim form, at least in part, because it "disagreed" with TCT's definition of a "call." Based on Ms. Worster's sworn declaration, which explicitly cites to Advice Letter 56 with approval, it appears that staff has reversed its position.

Therefore, in an effort to receive at least partial payment and avoid exiting the market, TCT has prepared an amended claim form reflecting TCT's per-call reimbursement request for 1-60 untimed calls based on the definition of a "call" in its approved tariff. TCT is also addressing other minor deficiencies identified by Ms. Worster in her sworn declaration by deleting 61+ call (pending a subsequent appeal) and correcting, as appropriate, adjustments to service connection charges, new order charges and the number of active customers for untimed calls.

TCT notes that the Court denied its motion for stay in reliance on Ms. Worster's representations, therefore we assume that TCT's claim forms will be processed in accordance with her statements. Given the urgency of the situation, TCT asks that after you have an opportunity to review this letter, you provide guidance to Ms. Worster to approve TCT's attached amended claim form and request expedited processing of the April payment. TCT will immediately submit the amended claim form attached as well as the other documentation required.

I appreciate your time and attention to this matter. TCT sincerely hopes that we can resolve this issue expeditiously to avoid forcing TCT to activate its exit plan as of tomorrow. We believe it is operationally impossible to move TCT's 11,704 Lifeline customers to a new carrier in the 15 days allotted under the Commission's involuntary exit rules.

Thank you,

Anita

iCommLaw

1547 Palos Verdes #298

Walnut Creek, CA 9459

(415) 699-7885

iCommLaw®
1547 Palos Verdes, #298
Walnut Creek, CA 94597
Phone: (415) 699-7885
Facsimile: (925) 274-0988
anita@icommlaw.com

September 15, 2020

Via Electronic Mail

California Public Utilities Commission
Mr. Robert Osborn, Director
Communications Division
505 Van Ness Avenue
San Francisco, CA 94102

Re: TC Telephone April Claim Form Amended in Response to Sworn Staff Statements in Opposition to Motion for Stay

Dear Mr. Osborn,

TC Telephone (“TCT”) (U 6975 C) hereby submits its April claim form amended to reflect statements in Ms. Worster’s sworn declaration submitted in opposition to TCT’s Motion for Stay of Resolution T-17687 in Case No. C092244. Based on Ms. Worster’s declaration it appears that one of the two legal issues in dispute has been resolved in TCT’s favor.

In her declaration, Ms. Worster told the Court:

On April 30, 2020, 2020, TCT submitted Advice Letter #56 to the Commission’s Licensing Section, implementing the changes to its tariffs for terms and conditions of service, in compliance with the directive in Resolution T-17687.¹

In her sworn declaration, Ms. Worster goes on to emphasize to the Court that “TCT’s April, May and June 2020 claim forms calculate TCT’s Lifeline reimbursement on a ‘per call’ basis, not a ‘per minute’ basis *in compliance with Resolution T-17687*.”² The Court denied the request for a stay in reliance on Ms. Worster’s representations.

TCT Advice Letter 56, which was explicitly endorsed by Ms. Worster as fully complying with the requirement to seek reimbursement on a per-call basis as required by Resolution T-17687, defines a “call” as having a three-minute duration based on the average call duration on TCT’s network. The tariff filing in Advice Letter 56 took effect on May 1 (several days in advance of TC Telephone’s submission of its April claim form). Although a supplement to the advice letter was subsequently

¹ Declaration of Chari Worster, at p. 3.

² Declaration of Chari Worster, at p. 8. (emphasis added).

suspended to provide staff additional time for review, TCT was not directed to change or remove the definition of a call in its general definition section of its tariff.

Thus, TCT has calculated its per-call reimbursement for April and subsequent months according to the definition of a “call” in its tariff. TCT identified the number of connections between 1 and 60 for each Lifeline customer and multiplied by the three-minute minimum.

Staff had previously stated that it “disagreed” with TCT’s definition of a “call” and asserted that a call must be defined as lasting one minute. Staff provided no citation to any Commission order, decision or state law to support that assertion.

To the best of TCT’s knowledge there is no Commission authority (including General Order 153) or state law that defines a “call” as one minute. Thus TCT assumes that Ms. Worster must have recognized that, in the absence of any contrary authority, TCT’s tariff definition must be applied pursuant to the filed-rate doctrine and based her sworn declaration on that understanding.

I trust it goes without saying that the Commission now has an obligation to process TCT’s claim forms consistent with Mr. Worster’s sworn representations to the Court. Nonetheless, I have sought input from the Commission’s Legal Division to confirm that TCT’s claim for reimbursement of untimed calls must be processed according to TCT’s definition of a call in its approved tariff. I have not yet received a response, so I am copying those individuals on this letter.

In her sworn declaration, Ms. Worster identified for the Court that the only “irregularities and non-conformances” preventing payment of TCT’s April claim form were reimbursement requests for: 1) service connection charges for Lifeline subscribers that do not qualify as new subscribers; 2) new service connection charges for Lifeline subscribers who upgraded their TC Telephone Lifeline service but did not switch from another carrier; and 3) telephone calls above 60.³ Therefore, TCT is submitting an amended April claim form seeking approximately \$373,000 in reimbursements. This figure addresses the deficiencies identified by Ms. Worter in her sworn declaration as follows:

New Orders: TCT has revised the number of new orders for reimbursement to match the 673 that staff indicated TCT could claim. Staff is disallowing 317 new orders apparently because those customers were active for only a portion of April due to re-certification. Staff has previously asserted that a customer must be active for every day in a given month for a new order reimbursement to be paid. TCT has been unable to determine the authority for staff’s position, but in the interest of expediting payment of the April claim, TCT is eliminating 317 new order reimbursements from its request. It may appeal this issue to the acting executive director if staff will not reconsider.

Conversions: TCT has eliminated all but 9 conversion charges. TCT understands that the Commission clarified that conversion charges may be claimed only when a customer switches from a different carrier, rather than when a customer switches between service plans with the same carrier. Staff has denied all of TCT’s conversion charges, including the 9 for which TCT continues to seek reimbursement. TCT respectfully submits that staff misidentified these customers as having switched between TCT service plans, while the data shows that the customers switched from another carrier to one TCT plan and then switched to a different TCT plan. Thus these 9 customers qualify for the conversion charge because the customers switched from another carrier even though they also switched between TCT service plans.

³Opposition to Motion for Stay, citing Declaration of Chari Worster.

Untimed Calls: TCT is claiming reimbursement for 7406 customers. Staff has denied 183 customers on the basis that they were “inactive.” That conclusion was confusing because these customers had usage on their accounts. After researching the issue, TCT believes these 183 customers were mistakenly viewed as inactive by staff due to an incorrect phone number (the customer had switched telephone numbers but the report issued by Maximus associated the old phone number with the customer.) As with new order charges, TCT disagrees, but has eliminated the 183 customers with mismatched telephone numbers in an effort to resolve this issue and expedite payment of the April claim form. As discussed above, TCT calculated reimbursement by multiplying the number of connections between 1 and 60 for each customer and multiplying by three, because a “call” is defined as having a duration of three minutes in TCT’s approved tariff. TCT may appeal this issue to the acting executive director if staff will not reconsider.

As you know, TCT has submitted an exit plan⁴ and indicated that if it does not receive payment for its April invoice soon, it will be forced to notify customers that it must exit the market and that they must seek a new provider. Although \$373,000 is far below TCT’s initial reimbursement request, it may provide enough operating capital so that TCT does not have to wind down operations while it seeks reconsideration of the issues still in dispute (including the elimination of reimbursement for 61+ calls after seven years of approving such claims). It will be necessary, however, for staff to approve the full amount in the amended April claim form and to expedite payment.

TCT respectfully submits that it is in the public interest to assist TCT in resolving this matter in a manner that does not force it to exit the market. In the most recent weighted average report from Maximus, TCT has 11,704 customers. Ms. Worster assured the Court that “the LifeLine customers will continue to be served,” even if the Court denies TCT’s Motion for Stay,⁵ but TCT believes it is operationally impossible to transfer its entire customer base to other carriers in only 15 days. Transferring the entire customer base would require moving an average of 780 customers per day counting all weekend days, or an average of 1,064 customers counting only business days. The highest number of customers TCT has ever been able to transfer in a month was around 23 per day. Further, TCT highly doubts that Maximus could handle the workload required to qualify all of these customers as Lifeline eligible for the receiving carrier in only 15 days.

After you have an opportunity to review this letter and consult with the Legal Division, if necessary, TCT requests that you direct Ms. Worster proceed immediately with the reimbursement for TCT’s April amended claim form.

Sincerely,



Counsel for TC Telephone, LLC

*cc: Chief ALJ Anne Simon
President Maribel Batjer
Commissioner Genevieve Shiroma*

⁴ TCT notes that Ms. Worster incorrectly stated to the Court that TCT had not notified the Commission “if or when” it may have to discontinue service to Lifeline customers. See Declaration of Chari Worster, at p. 2.

⁵ Declaration of Chari Worster, at p. 2.

Commissioner Martha Guzman-Aceves
Michelle Cook
Helen Mickiewicz
Travis Foss
Lucian Filler
Jonathan Lakritz
Chari Worster