



Decision \_\_\_\_\_

**FILED**

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

3/30/23

01:40 PM

R2010002

Order Instituting Rulemaking to Consider Regulating Telecommunications Services Used by Incarcerated People.	Rulemaking 20-10-002 (Filed October 8, 2020)
--	---

**INTERVENOR COMPENSATION CLAIM OF THE UTILITY REFORM NETWORK  
AND DECISION ON INTERVENOR COMPENSATION CLAIM OF THE UTILITY  
REFORM NETWORK**

**NOTE:** After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at [lcompcoordinator@cpuc.ca.gov](mailto:lcompcoordinator@cpuc.ca.gov).

<b>Intervenor:</b> The Utility Reform Network	<b>For contribution to Decision</b> <ul style="list-style-type: none"><li>• D.21-08-037,</li><li>• D.22-04-038</li></ul>
<b>Claimed: \$304,828.75</b>	<b>Awarded: \$</b>
<b>Assigned Commissioner:</b> Darcie L. Houck	<b>Assigned ALJ:</b> Robert Haga
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as TURN Claim Attachment 1).	
<b>Signature:</b>	/s/ Brenda Villanueva
<b>Date: 3/30/2023</b>	<b>Printed Name:</b> Brenda Villanueva

**PART I: PROCEDURAL ISSUES**

**(to be completed by Intervenor except where indicated)**

<b>A. Brief description of Decision:</b>	In <b>D.21-08-037</b> , the Commission adopted interim rate relief rules for incarcerated person's calling services. The Commission adopted an interim rate cap of seven cents (\$0.07) per minute for debit, prepaid calls, and collect calls (Interim Rate Cap). The Commission also prohibited ancillary fees for these services, with one exception; permitted government taxes with no markup; and prohibited the imposition of any
--	--

	<p>other type of ancillary fee or service not explicitly approved by the Decision. The Commission also ordered service providers to file proof of compliance within 45 days of issuance of the Decision.</p> <p>In <b>D.22-08-038</b>, the Commission denied two providers’ applications for rehearing of D.21-08-037, filed by Securus and NCIC.</p> <p>In <b><i>Securus Technologies, LLC v. Public Utilities Com., No. B320207</i></b>, the California Court of Appeals, 2<sup>nd</sup> district affirmed D.21-08-037. <i>Securus Technologies, LLC v. Public Utilities Com., No. B320207</i> (Cal. App. 2nd Dist., Feb. 1, 2023) (<i>unpublished</i>), (Cal. App. 2nd Dist., Feb. 27, 2023) (<i>published</i>) [2023 Cal. App. LEXIS 133].</p>
--	--

**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	<b>Intervenor</b>	<b>CPUC Verification</b>
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	December 10, 2020	
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	January 11, 2021	
4. Was the NOI timely filed?		
<b>Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	R.20-08-021	
6. Date of ALJ ruling:	December 11, 2020	
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.20-08-021	
10. Date of ALJ ruling:	December 11, 2020	
11. Based on another CPUC determination (specify):		
12. Has the Intervenor demonstrated significant financial hardship?		

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	<i>Securus Technologies, LLC v. Public Utilities Com.</i> , No. B320207 (Cal. App. 2nd Dist., Feb. 1, 2023) ( <i>unpublished</i> ), (Cal. App. 2nd Dist., Feb. 27, 2023) ( <i>published</i> ) [2023 Cal. App. LEXIS 133].	
14. Date of issuance of Final Order or Decision:	February 27, 2023	
15. File date of compensation request:	March 30, 2023	
16. Was the request for compensation timely?		

**C. Additional Comments on Part I: (use line reference # as appropriate)**

#	Intervenor's Comment(s)	CPUC Discussion

**PART II: SUBSTANTIAL CONTRIBUTION**  
**(to be completed by Intervenor except where indicated)**

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)**

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
<b>1. Background</b>  The Commission opened this proceeding on its own to address for the first time, the rates for telecommunication services provided to incarcerated and detained people in the State. In 2013, the FCC adopted rules to establish rates for interstate and intrastate incarcerated phone calling services. However, in	<ul style="list-style-type: none"> <li>OIR at 6 (October 19, 2020) (stating, "The Commission opens this OIR on its own motion to ensure that incarcerated people in the State pay just and reasonable rates for telecommunications services, under just and</li> </ul>	

<p>2017, the DC Circuit court struck down the FCC rate regulation for intrastate incarcerated phone calling services as beyond the FCC’s jurisdiction. This created a regulatory gap for intrastate incarcerated phone calling services, including in California. Subsequently, at the FCC’s encouragement for states to address intrastate services, the Commission’s work commenced with this proceeding with a “rulemaking [to] build[] on work by the [FCC] to regulate interstate inmate communications services.”</p> <p>The Commission recognized that this was a novel issue and strongly encouraged active fact-finding and work with stakeholders with more experience in this field as reflected below in this claim. Many advocates for incarcerated calling services (“subject matter champions” as referred to in this claim) and service providers involved in this proceeding are generally not active participants in Commission processes.</p> <p>The Commission bifurcated this proceeding into two phases, with the possibility of more phases in the future. Phase I of this proceeding set out to define inmate communication services, examine market competition, and provide interim rate relief for incarcerated communications services. Phase 1 decisions focused on phone calling services and ancillary fees. The Commission issued a decision providing interim relief for incarcerated communication services in D.21-08-037.</p>	<p>reasonable terms and conditions”);</p> <ul style="list-style-type: none"> <li>• OIR at 4-6;</li> <li>• Scoping Memo at 1-2 (January 12, 2021) (citing <i>In the Matter of Rates for Intrastate Inmate Calling Services</i>, WC Docket No. 12-375 (rel. Aug. 7, 2020));</li> <li>• <i>See, e.g.</i>, OIR at 10-12 (October 19, 2020) (listing as respondents a number of “non-profit organizations concerned with incarcerated peoples’ and/ or consumer advocates for communications services”).</li> <li>• <i>See</i> TURN Claim Attachments 5 and 6.</li> <li>• Scoping Memo at 24-25 (January 12, 2021) (setting issues for Phase I) <i>Id.</i> at 25-27 (setting issues for Phase II).</li> <li>• D.21-08-037 at 1-2, 102-103 (Phase 1 decision, stating intentions to review video services in Phase II).</li> </ul>	
---	--	--

<p>--</p> <p>Then NCIC and Securus each filed an application for rehearing of D.21-08-037. TURN joined others (Joint Consumers, collectively) in responding to the application for rehearing on several issues as discussed below. The Commission issued a decision denying both the NCIC and the Securus respective, applications for rehearing in D. 22-04-038.</p> <p>--</p> <p>On May 11, 2022, Securus filed a petition for writ of review of the Commission’s Phase 1 decisions at the California Court of Appeal, 2<sup>nd</sup> District (The Court). The Court upheld the Commission’s decisions for interim relief.</p> <p>This compensation request address Phase 1 issues and decisions (D.21-08-037, D.22-04-038). TURN will submit a subsequent compensation request to address Phase II and other issues in this proceeding.</p>	<p>--</p> <ul style="list-style-type: none"> <li>• NCIC Inmate Communications (U 6086 C) Application for Rehearing, D.21-08-037 (September 21, 2021)</li> <li>• Securus Technologies, LLC (U-6888 C) Application for Rehearing of D.21-08-037 (September 22, 2021).</li> <li>• TURN, Center for Accessible Technology, and Prison Policy Initiative Opposition to the Applications for Rehearing of D.21-08-037 (October 7, 2021)(hereinafter, Joint Consumers Opposition to Applications for Rehearing).</li> <li>• D.22-04-038 (denying Phase 1 applications for hearing).</li> </ul> <p>--</p> <ul style="list-style-type: none"> <li>• <i>Securus Technologies, LLC v. Public Utilities Com.</i>, No. B320207 (Cal. App. 2<sup>nd</sup> Dist., Feb. 1, 2023)(<i>unpublished</i>), (Cal. App. 2<sup>nd</sup> Dist., Feb. 27, 2023)(<i>published</i>) [2023 Cal. App. LEXIS 133]<sup>2</sup> (hereinafter <i>Securus Technologies, LLC v. Public Utilities Com.</i>, No. B320207).</li> </ul>	
---	---	--

<sup>2</sup> *Securus Technologies, LLC v. Public Utilities Com.*, No. B320207 (Cal. App. 2<sup>nd</sup> Dist., Feb. 1, 2023) (*unpublished*), (Cal. App. 2<sup>nd</sup> Dist., Feb. 27, 2023)(*published*) [2023 Cal. App. LEXIS 133], the opinion is available on the Court’s page, <https://www.courts.ca.gov/opinions/documents/B320207.PDF>.

<p><b>2. Need for Regulation</b></p> <p>The Commission asked whether it should look to FCC regulations “to inform the Commission’s approach to [incarcerated person’s calling] services.” At several stages in the proceeding, TURN urged the Commission to act independently of the FCC’s precedent and to determine a solution that addressed the needs in California. Specifically, TURN “encourage[d] the Commission to take a thoughtful review of both the federal level developments and the [incarcerated person’s calling services] market needs in California.”</p> <p>The Commission agreed that it should act independently of the FCC and adopted interim rates based on the record of this proceeding. (<i>see below</i> discussion in category, Rates for Interim Relief)</p>	<ul style="list-style-type: none"> <li>• Scoping Memo at 25 (January 12, 2021);</li> <li>• TURN OIR Reply Comments at 6-7, 9-10 (November 19, 2020);</li> <li>• TURN Staff Proposal Reply Comments at 13 (May 12, 2021), <i>see also</i> D.21-08-037 at 48 (stating, “TURN observes that the FCC has clearly affirmed that states may adopt rate caps lower than those set by the FCC, and the D.C. Circuit explicitly removed FCC jurisdiction from dictating intrastate [incarcerated person’s calling services] rates”), 69-70 (same), 75 (same);</li> <li>• D.21-08-037 at COLs 17, 18 (stating, “[t]he Commission is not preempted from imposing intrastate rates or fees lower than those adopted by the FCC, including with regards to calls with interstate and intrastate components, where federal requirements operate as a ceiling”), at COL 12, OPs 1-2 (adopting rates lower than the FCC’s rates);</li> <li>• D.22-04-038 at 17 (stating, “[n]or do we obstruct federal law, given that the FCC has spoken approvingly of independent policymaking in California”).</li> </ul>	
<p><b>3. Market Failure</b></p> <p>The Commission asked parties whether it should “examine the conditions of communication services market competition and seek verifiable evidence of the true costs of service providers of [incarcerated person’s calling] services?”</p>	<ul style="list-style-type: none"> <li>• Scoping Memo at 24 (January 12, 2021);</li> <li>• Staff Proposal, Attachment at 1-2 (April 2, 2021);</li> </ul>	

<p>Moreover, in a Staff Proposal, the Commission Staff found that “rates being charged to [incarcerated persons] in California to be unreasonable” and “are offered on a monopoly basis.” TURN “urge[d] the Commission to analyze [incarcerated person’s calling] services as they have historically been provided so that it can craft meaningful and workable long-term solutions to the market failures and inequities that have plagued this industry for decades.” TURN supported the Staff Proposal’s conclusions and encouraged the Commission to find there has been a market failure and therefore a need for regulation. TURN further urged the Commission to consider among several elements, the view of the end-user, the need for relief even when the may later examine at the competitive bidding market.</p> <p>In D.21-08-037, the Commission found there was a market failure, high and varied rates for the services across the state, and grounds to regulate the rates for incarcerated person’s calling services.</p>	<ul style="list-style-type: none"> <li>• TURN OIR Opening Comments at 5 (November 9, 2020);</li> <li>• TURN OIR Reply Comments at 6, 12-13 (November 19, 2020).</li> <li>• <i>See</i>, TURN Staff Proposal Opening Comments at 3-9 (April 30, 2021);</li> <li>• TURN Staff Proposal Reply Comments at 4-10 (May 12, 2021);</li> <li>• TURN Proposed Decision Reply Comments at 1-2 (August 9, 2021).</li> <li>• D.21-08-037 at 33-39, FOF 2-13 (finding incarcerated person’s calling services rates are exorbitantly high and vary widely across the state), at 18 (stating, “[o]nce selected, [incarcerated person’s calling service] providers, whether individually or collaboratively with incarcerated facilities use their locational monopoly status within facilities to exercise market power”); at COL 6 (stating, “[t]he Commission has the authority to investigate market power abuses on the part of public utilities and to regulate rates where monopolies exist or where competition is prohibited or does not otherwise exist”), at COL 7;</li> </ul>	
--	--	--



<p>Subsequently, in response to the Applications for Rehearing for D.21-08-037, TURN (and Joint Consumers) demonstrated in great detail that the Commission’s market analysis, including its definition of the relevant market, and conclusion of market failure, was supported by substantial evidence in light of the whole record. Moreover, TURN (and Joint Consumers) rebutted provider arguments that the Commission was required to determine the level of competition in the contract bidding market prior to determining whether caller rates were unjust and unreasonable.</p> <p>Relying on similar record evidence and findings that TURN (and Joint Consumers) raised, the Commission affirmed its lengthy findings and discussion of the relevant market, market analysis, and market failure.</p>	<ul style="list-style-type: none"> <li>• Joint Consumers Opposition to Applications for Rehearing at 2-7 (October 7, 2021)</li> <li>• D.22-04-038 at 19-22; <i>Id.</i> at 19 (stating, “[w]e discussed, at length, its findings regarding the [incarcerated person’s calling services] market, market power of [incarcerated person’s calling services] providers, and the existence of locational monopolies operated by [incarcerated person’s calling service] providers”).</li> </ul>	
<p><b>4. Jurisdiction – Internet Protocol-based and Video Calling Services</b></p> <p>TURN advocated that the Commission should interpret its jurisdiction broadly over incarcerated person’s calling services. The Commission generally agreed and held that “[t]elephone corporations providing [incarcerated person’s calling services] voice services, including VoIP [Voice over Internet Protocol] technologies, are public utilities subject to [the Commission’s] jurisdiction.” The Commission adopted interim rules that applied to “intrastate incarcerated person’s voice calling services.”</p>	<ul style="list-style-type: none"> <li>• TURN OIR Opening Comments at 14 (November 9, 2020) (“Moreover, as IDCS evolves to IP-based platforms these services should continue to be subject to the Commission’s jurisdiction”);</li> <li>• D.21-08-037 at COL 2-3, and at OP 1 (stating that the adopted interim rules applied to “intrastate incarcerated person’s voice calling services” that included but was not limited to “voice and Voice Over Internet Protocol</li> </ul>	



<p>TURN also urged the Commission to include video calling services in its review and regulation of incarcerated person’s calling services and refer to material in the record for these services provided by other parties. Such regulation is especially important given providers’ “comments that changes will be made to encourage incarcerated [persons] to use non-regulated services [ . . . by] mak[ing] voice communications inaccessible . . . .” However, the Staff Proposal stated that the Commission Staff “did not have the necessary relative pricing data to determine the reasonableness of these and other non-voice communications services rates.”</p> <p>The Commission agreed that video communication services were important as part of its review, however, the Commission deferred action in this phase and stated its intent “to review video services in Phase II of this proceeding.” In addition, the Commission found “alarming” a provider’s statement that the rules would “encourage the incarcerated to use non-regulated services.”</p>	<p>(VoIP) calling, and voice and VoIP voice communications services service people with disabilities”).</p> <ul style="list-style-type: none"> <li>• TURN OIR Opening Comments at 21 (November 9, 2020);</li> <li>• TURN OIR Reply Comments at 3-4 (November 19, 2020).</li> <li>• Staff Proposal at 5 (April 2, 2021);</li> <li>• TURN Staff Proposal Opening Comments 8-9 (April 30, 2021)(supporting the inclusion of video calling services in Phase 1);</li> <li>• TURN Staff Proposal Reply Comments 11-12 (May 12, 2021);</li> <li>• TURN Proposed Decision Opening Comments at 3-5 (August 2, 2021).</li> <li>• D.21-08-037 at 21, 95-96. <i>Id.</i> at 95-96 (citing NCIC Inmate Communications Comments on the Proposed Decision at 3 (Aug. 2, 2021)).</li> <li>• D.21-08-037 at 96 (expressing concern “that the IPCS providers will attempt to make voice communication inaccessible in order to force incarcerated persons and their loved ones to use more expensive communication services such as video calling”), at 103 (stating that the Commission “intend[s] to</li> </ul>	
--	---	--

	review video services in Phase II of this proceeding”).	
<p><b>5. Jurisdiction – “Jurisdictionally Mixed” Communications</b></p> <p>TURN advocated for the Commission “to establish regulatory boundaries [by] request[ing] comments regarding how the industry currently determines ‘call end point’ locations and whether there are alternative ways of distinguishing interstate and intrastate calling to ensure California detainees and their families are protected.” TURN explained that the FCC’s most recent decision reiterated the state’s ability to regulate, and that federal FCC action operated as a “ceiling” but that states may require “lower rates or fees, even in jurisdictionally mixed services.”</p> <p>Also, TURN (with Joint Consumers) explained California law and FCC decisions to respond to provider arguments that fees due to their intrastate/interstate nature, are outside the reach of the Commission’s regulatory authority.</p> <p>The Commission found that providers can identify the end points of a call but there are rare cases where a provider cannot definitely determine the end point. The Commission explained and referenced the FCC, in concluding that in these rare cases are “jurisdictionally mixed.” The Commission’s analysis was similar to TURN’s (with Joint Consumers) that the FCC “does not preempt the restrictions [the Commission] adopt[s] here for jurisdictionally mixed ancillary charges.”</p>	<ul style="list-style-type: none"> <li>• TURN OIR Opening Comments at 8-9, 16, 22-23 (November 9, 2020);</li> <li>• TURN Proposed Decision Reply Comments at 3, n. 15 (Aug. 9, 2021) (citing FCC 21-60 at 99-100, para. 217 and note 679, 682, 683 (explaining that FCC action operates as a ceiling, but states are not preempted from requiring lower rates or fees, even in jurisdictionally mixed services))).</li> <li>• <i>See also</i> Joint Consumers Opposition to the Applications for Rehearing of Decision 21-08-037 at pp. 32-33 (Oct. 7, 2021)(responding to arguments related to jurisdictionally mixed services).</li> <li>• D.21-08-037 at 1, 75, 101-102 (rebutting providers’ arguments that jurisdictionally mixed services are under the FCC’s jurisdiction), at COL 20 (stating, “[f]or jurisdictionally mixed ancillary services, FCC requirements do not preempt state law or regulations as long as the state requirements impose lower fees,” at COL 21, COL 23;</li> <li>• See also, D.22-04-038 at pp. 18-19 (stating, “California law (in tandem with FCC guidance)</li> </ul>	

	grants us authority to regular jurisdictionally mixed ancillary fees which we do appropriately here”).	
<p><b>6. Definition of “Inmate Communications Services”</b></p> <p>TURN urged “the Commission to consider its scope broadly to include calling services offered to those incarcerated or detained in California, and their families and other support systems, regardless of type of facility or the type of technology used to offer these services.”</p> <p>TURN also recommended that in addition to prisons and jails at the state and county level, the Commission should consider service providers that serve other types of detention facilities, including those that house immigrant populations either through federal contracts with private facilities, or state or local facilities. TURN supported the Scoping Memo’s broad definition of facilities and technologies for the purposes of defining incarcerated person’s calling services.</p> <p>The Commission agreed to take a broad approach and adopted interim rules that defined incarcerated person’s calling services as “voice calling services provided to any local, state, or federal correctional or detention facility type operated in California housing adults and/or juveniles, including but not limited to city and county jails, federal</p>	<ul style="list-style-type: none"> <li>• TURN OIR Opening Comments at 3, 6, 10 (November 9, 2020);</li> <li>• See also, TURN OIR Reply Comments at 4-5 (November 19, 2020).</li> <li>• Scoping Memo at 22-24 (January 12, 2021) (referencing TURN’s proposal and including “any and all communication services provided by telephone corporations to incarcerated or detained minors or adults held in California);</li> <li>• Staff Proposal at 1-2, fn. 1 (April 2, 2021).</li> <li>• TURN Staff Proposal Opening Comments at 2-3 (April 30, 2021);</li> <li>• TURN Staff Proposal Reply Comments at 2-3 (May 12, 2021).</li> <li>• TURN Proposed Decision Opening Comments at 1-2 (August 2, 2021).</li> </ul> <ul style="list-style-type: none"> <li>• D.21-08-037 at 21, COL 5.</li> </ul>	

<p>and state prisons, correctional facilities, juvenile detention facilities, holding centers, camps, psychiatric hospitals, immigration detention centers, military jails and tribal jails, including, but not limited to, voice and interconnected VoIP calling, and voice and VoIP communications services service people with disabilities.”</p>		
<p><b>8. Ancillary Services Fees</b></p> <p>At the outset of the proceeding, TURN urged “the Commission should study the various ancillary fees charged for all the calling options referenced in the OIR,” and that the Commission “should determine the impact of these fees on [incarcerated person’s calling] service affordability to ensure that these fees do not increase rates, thereby addressing rates that are not ‘just and reasonable.’” Specifically, TURN recommended that “the Commission should study single-call service fees, automated payment service fees, third party fees, live agent fees, and paper bill fees, as well as late payment fees, return check charges, and any other fees for calls that service providers identify as intrastate.”</p> <p>Commission Staff issued data requests to providers and analyzed the various ancillary fees. As a result, Commission Staff found the providers charge exorbitant ancillary fees and recommended the Commission cap the ancillary fees for intrastate and mixed jurisdiction incarcerated person’s calling services. In the Staff Proposal, staff proposed to adopt the FCC caps. TURN recommended an approach to similarly limit the fees to those the FCC listed but to make further reduction to account for intrastate services, including to account for the then-forthcoming FCC decision</p>	<ul style="list-style-type: none"> <li>• TURN OIR Opening Comments at 22-24 (November 9, 2020);</li> <li>• See also, TURN OIR Reply Comments at 9-10 (November 19, 2020) (“TURN and others encourage the Commission to review these [ancillary] fees in the broadest sense, including the FCC’s work and the issues regarding segregation between intrastate and interstate communications, and then make the necessary determination for California.”)</li> <li>• TURN Staff Proposal Opening Comments at 5-6, 14-16 (April 30, 2021).</li> <li>• Staff Proposal at Attachment 1(Staff Proposal), pp. 3-4 (April 2, 2021) (recommending the Commission adopt FCC caps); at Attachment A (Data request summary of information); at Attachment B (Other Inmate Calling Service Fees and Charges).</li> <li>• TURN Staff Proposal Opening Comments at 14-17 (April 30, 2021);</li> </ul>	

<p>on fees. TURN also recommended that the Commission prohibit the fees that are not identified and explicitly approved.</p> <p>The Commission agreed with TURN and others, that the Commission has authority to act independently of the FCC to regulate fees. The Commission found that providers charge exorbitant ancillary fees. The Commission’s decision capped ancillary fees for intrastate and mixed jurisdiction incarcerated person’s calling services. Although the Commission went even further than TURN’s proposal to limit certain fees, the Commission did prohibit charging fees “not identified and explicitly approved here in association with any intrastate or jurisdictionally mixed IPCS call.”</p> <p>--</p> <p>TURN (with Joint Consumers) defended the Commission’s interim relief decision and rebutted the providers’ applications for rehearing that argued that the Commission’s cap on ancillary fees was an abuse of discretion. Specifically, TURN (with Joint Consumers) addressed the Commission’s regulatory authority, preemption arguments, evidence of the fees in the record, intrastate and jurisdictionally mixed services.</p> <p>The Commission generally agreed with Joint Consumers and denied the applications for rehearing. The Commission agreed that it had regulatory authority and took a similar position as Joint Consumer’s preemption arguments,</p>	<ul style="list-style-type: none"> <li>• TURN Staff Proposal Reply Comments at 14-16 (May 12, 2021).</li> <li>• Proposed Decision at 69-72, and note 220 (July 2021)(citing to TURN’s Staff Proposal reply comments and the FCC legal research that TURN provided).</li> <li>• D.21-08-037 at 72-77, 103-105 and note 281 (citing TURN’s Staff Proposal reply comments and the FCC legal research that TURN provided); at FOF 34-36; FOF 37 (stating, “[m]ost ancillary service fees and charges found in connection with the [incarcerated person’s calling services] market are not imposed in any other segment of the telecommunications market in California”), FOF 38-49; COLs 18-27; OPs 3-4.</li> <li>• Joint Consumers Opposition to Applications for Rehearing at 25, 28-33 (October 7, 2021)</li> <li>• D.22-04-038 at pp. 15-19, 31-32.</li> </ul>	
--	--	--

<p>and further noted that although the Commission was informed by the FCC, it was not limited to the FCC cap. Moreover, as Joint Consumers referenced, the Commission also pointed to record evidence of the fees.</p>		
<p><b>9. Site Commissions</b></p> <p>TURN advocated that “the Commission should review how site commissions and related fees and payments between the service provider and facilities, at the county and local level, affect the rates charged for IDCS service and whether these should be an element in a future rate calculation.” Specifically, TURN recommended that “[t]he Commission should attempt to clearly break out these contract elements to ensure ratepayers are not shouldering the burden to support this business model.”</p> <p>The Commission reviewed site commissions and found that “[w]here they exist, site commission payments are a significant factor contributing to high rates and can account for 20-88 percent of [incarcerated person’s calling services] costs.” In adopting an interim intrastate incarcerated person’s calling service rate, the Commission required that “collections of site commission funds pursuant to Penal Code Section 4025, if any, must be in accordance with the provision of just and reasonable calling rates for incarcerated persons and their families pursuant to Public Utilities Code Section 451.” Although the Commission did not reference a business model as TURN noted, the Commission did agree that certain site commissions do not “constitute ‘costs of doing business’ that are necessary” for these services.</p>	<ul style="list-style-type: none"> <li>• TURN OIR Opening Comments at 9-10, 19-20 (November 9, 2020);</li> <li>• See also, TURN OIR Reply Comments at 10 (November 19, 2020).</li> <li>• TURN Proposed Decision Reply Comments at 3, n. 14 (August 9, 2021).</li> <li>• D.21-08-037 at FOF 14;</li> <li>• See also, D.21-08-037 at pp. 9-10, 28, 32-33, FOF 15, 20, 26-27, 29, COLs 9-11.</li> <li>• D.21-08-037 at 37.</li> </ul>	

<p>--</p> <p>TURN (with Joint Consumers) opposed providers' applications for rehearing that argued that site commissions were warranted, by referencing the record evidence on site commissions, rebutting the faulty analysis claims, and showing that the providers failed to show an error in the site commission analysis. The Commission generally agreed with Joint Consumers and denied the providers' applications for rehearing, finding that it's a business decision if a provider agrees to a site commission that exceeded the recoverable rate cap.</p>	<p>--</p> <ul style="list-style-type: none"> <li>• Joint Consumers Opposition to Applications for Rehearing at 33-35 (October 7, 2021)</li> <li>• D.22-04-038 at pp. 13-15.</li> </ul>	
<p><b>10. Rates - Interim Relief</b></p> <p>The Commission asked parties whether it should "provide immediate interim relief to meet the inmate communication service needs of incarcerated people and their families at just and reasonable rates, including those with communications disabilities" and how. TURN advocated that the Commission to adopt interim rates, but that the Commission should set a rate lower than the Staff Proposed interim rate set to match the FCC's adopted rates. The Commission generally agreed and adopted an interim rate even lower than the one TURN proposed.</p> <p><u>(a) Rates – URF</u></p> <p>TURN opposed providers' arguments to apply Uniform Regulatory Framework (URF) to avoid rate regulation of incarcerated person's calling services. The Commission generally agreed with TURN's position and stated the</p>	<ul style="list-style-type: none"> <li>• Scoping Memo at 25 (January 12, 2021);</li> <li>• TURN Staff Proposal Opening Comments at 9-14 (April 30, 2021);</li> <li>• TURN Staff Proposal Reply Comments at 10-13, 16-17 (May 12, 2021)</li> <li>• D.21-08-037 at pp. 46-49 (discussing advocates' proposals), FOFs 27-30, OP 2 (adopting an "[i]nterim cap on intrastate rates for incarcerated persons calling services in California of seven cents (\$0.07) per minute for debit, prepaid, and collect calls").</li> </ul> <p><u>(a) Rates – URF</u></p> <ul style="list-style-type: none"> <li>• TURN OIR Reply Comments at 3 (November 19, 2020) (stating, "GTL's reliance on the Commission's Uniform Regulatory Framework 'URF' is misplaced when applied to</li> </ul>	



<p>Commission “retains the authority and firm resolve” to apply rate regulation “should it see evidence of market power abuse.” In its decision adopting interim rules, the Commission did not apply URF to incarcerated person’s calling services</p> <p><u>(b) Sufficiency of the Data</u></p> <p>Both prior the interim decision and in response to provider applications for rehearing, TURN supported the Commission’s analysis and argued that the Commission had sufficient data to move forward with interim rates even though providers had not provided their cost data.</p> <p>The Commission agreed that it had sufficient data and noted that providers had ample time to provide data.</p> <p>--</p> <p><u>(c) Waiver</u></p> <p>TURN opposed providers’ request for a waiver of the interim rates discussed in the proposed decision. The Commission denied the providers’ request and did not adopt a waiver process, noting that these arguments focused on the hardship on the provider and not on the need for just and reasonable rates for IPCS.</p>	<p>[incarcerated person’s calling services] and the myriad of market failures, discriminatory practices, egregious rates, and significant public policy concerns that are already documented in the record with just these opening comments”;</p> <ul style="list-style-type: none"> <li>• D.21-08-037 at p. 17, OPs 1-3.</li> </ul> <p><u>(b) Sufficiency of the Data</u></p> <ul style="list-style-type: none"> <li>• TURN Opening Comments on the PD, August 2, 2021, at pp. 11-12;</li> <li>• TURN Reply Comments on the PD, August 9, 2021, at pp. 2-4;</li> <li>• D.21-08-037 at pp. 59, 95, 101-102.</li> <li>• See also, Joint Consumers Opposition to Applications for Rehearing at 7-14 (October 7, 2021);</li> <li>• D.22-04-038 at p. 5 (noting ample comments to support lower rates), 8 (noting providers had ample opportunity to participate), 11 (noting providers failed to introduce concrete cost data), 20 (same), 24 (same).</li> </ul> <p>--</p> <p><u>(c) Waiver</u></p> <p>TURN Proposed Decision Reply Comments at 5 (August 9, 2021);</p> <p>D.21-08-037 at pp. 60-61 (denied waiver process), pp. 100-101.</p> <p>D.22-04-038 at 27.</p>	
---	--	--

[illegible]

[illegible]

	<u>In-Language</u> <ul style="list-style-type: none"> <li>• TURN Proposed Decision Opening Comments at 10-11 (August 2, 2021);</li> <li>• D.21-08-037 at pp. 3, 61, 79-80; FOF 52; COL 27, 29; OP 4(g), 5, 6.</li> </ul>	
--	--	--

**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	<b>Intervenor's Assertion</b>	<b>CPUC Discussion</b>
<b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?<sup>3</sup></b>	Yes	
<b>b. Were there other parties to the proceeding with positions similar to yours?</b>	Yes	
<b>c. If so, provide name of other parties:</b> Center for Accessible Technology (CforAT), Prison Policy Initiative (PPI), and the Californians for Jail and Prison Phone Justice Coalition.		
<b>d. Intervenor's claim of non-duplication:</b>  This compensation request covers work that had implications and significant impacts on some of California's most vulnerable consumers, including during the on-going coronavirus pandemic. The Commission should find that TURN efficiently coordinated with all intervenors with similar interests wherever possible, avoiding undue duplication as explained below. TURN's compensation should not be reduced for duplication of effort with the other parties to the proceeding. TURN took reasonable steps to keep any duplication to a minimum, including working closely with Center for Accessible Technology (CforAT), Cal Advocates, Prison Policy Initiative (PPI), and the Californians for Jail and Prison Phone Justice Coalition (Worth Rises) to complement and assist the work of each consumer representative.  Throughout Phase 1, TURN and the other intervenors engaged in extensive coordination that allowed each organization to inform the Commission about the new issues of communications services for incarcerated persons in California, and to file pleadings at almost every opportunity. As the time		

<sup>3</sup> The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

records reflect, and as further described in section below (section III.A.a. “coordination” discussion), TURN advocates met with and provided technical assistance to subject matter champions that were new to the Commission and the Commission process to participate and file pleadings in this proceeding. *See e.g.*, Californians for Jail and Prison Phone Justice Coalition OIR Opening Comments (Nov. 9, 2020); Root and Rebound OIR Opening Comments (Nov. 9, 2020); Prison Policy Initiative OIR Reply Comments (Nov. 19, 2020). This coordination avoided unnecessary duplication of efforts by facilitating the subject matter champions’ expertise shared with the Commission and by also relying on this information instead of attempting to recreate field studies or conducting the same qualitative analysis. *See* Prison Policy Initiative OIR Opening Comments at 3-5 (Nov. 9, 2020); Root and Rebound OIR Opening Comments at 7-8 (Nov. 9, 2020); TURN Staff Proposal Opening Comments at 3, notes 13, 15, 16, 17 (Apr. 30, 2021) (citing Prison Policy Initiative OIR Opening Comments and Root and Rebound OIR Opening Comments).

TURN provided unique contributions to the discussion that were covered in a more limited way by other intervenors. For example, TURN wrote extensively throughout Phase 1 about the Commission’s jurisdiction over Voice over Internet Protocol (VoIP) and IP-enabled services that facilitate communication services for incarcerated persons. *See* TURN OIR Opening Comments at 13-15 (Nov. 9, 2020); TURN OIR Reply Comments at 2-4 (Nov. 19, 2020)(responding to arguments that the Commission lacks jurisdiction); TURN Staff Proposal Opening Comments at 8, 9, 11 (Apr. 30, 2021); TURN Staff Proposal Reply Comments at 2-3, 12-13, 16 (May 12, 2021) )(responding to arguments that the Commission lacks jurisdiction); TURN Opening Brief at 1, 3-4 (Aug. 2, 2021).

**Other Intervenors.** Although TURN coordinated or discussed some issues with other intervenors, TURN independently contributed unique approaches and proposals for the Commission to consider as it determined the rates and fees for communications services for incarcerated persons in California. For example, TURN recommended an approach for rates for voice services (percentage reduction that reflected intrastate services) that was different than other intervenors. *Compare* TURN Staff Proposal Opening Comments at 11-12 (suggesting a 30 percent reduction from the FCC rate, approximately 9 cents per minute) *with* Californians for Jail and Prison Phone Justice Coalition Staff Proposal Reply Comments at 4 (May 12, 2021)(suggesting several approaches under 9 cents per minute and a set of free calls), Cal Advocates Staff Proposal Comment at 7 (suggesting 5 cents per minute); CforAT Staff Proposal Comment at 7 (suggesting adopting the FCC new rate but provide a set of free calls) and CforAT Staff Reply Comment at 7 (supporting Cal

Advocates' proposal of 5 cents per minute). The Commission distinguishes the proposals in its decision. D.21-08-037 at 46-49.

**Cal Advocates.** TURN coordinated with Cal Advocates to discuss several issues unique to this proceeding but ultimately, filed independently and offered policy positions that were different in some ways from Cal Advocates' positions. For example, on the issue of ancillary fees for these communication services, TURN's proposal recommended a percentage reduction from the current FCC method but to keep the types of fees that the FCC approach used, while Cal Advocates suggested to reduce the types of fees allowed altogether. The Commission compares the various approaches in its decision. *See* D.21-08-037 at 65-69 (discussing Cal Advocates' ancillary fees proposal), at 69-70 (discussing TURN's ancillary fees proposal).

A second example is that TURN supported the inclusion of video calling services in the Commission's Phase I decision; Cal Advocates advocated that video calling services should be considered not in Phase 1 but in the Phase 2. *Compare* TURN Staff Proposal Opening Comments 8-9 (Apr. 30, 2021)(supporting the inclusion of video calling services in Phase 1), TURN Staff Proposal Reply Comments 11-12 (May 12, 2021), TURN Proposed Decision Opening Comments at 3-5 (Aug. 2, 2021) *with* Cal Advocates Staff Proposal Opening Comments at 13-14 (Apr. 30, 2021)(suggesting that video calling services be considered in Phase 2) and Cal Advocates Proposed Decision Opening Comments at 4-5 (Aug. 2, 2021); Cal Advocates Proposed Decision Reply Comments at 4-5 (Aug. 9, 2021)(recognizing TURN's video calling service approach).

A third and fourth examples are that TURN advocated for equity considerations and in-language consumer education, but Cal Advocates did not raise these issues. *Compare* TURN Proposed Decision Opening Comments at 5-11 (Aug. 2, 2021); *with* Cal Advocates Proposed Decision Opening Comments (Aug. 2, 2021); Cal Advocates Proposed Decision Reply Comments (Aug. 9, 2021).

**Joint Response to Application for Rehearing.** TURN worked closely with Prison Policy Initiative and CforAT to draft a joint response to the Applications for Rehearing of D. 21-08-037 filed by NCIC and Securus. This coalition allowed TURN to maximize its substantial contributions in the response and avoid duplication of effort. The coalition discussed and assigned different issues to each organization where possible, split up the drafting and research efforts, and assigned one organization to coordinate the work effort. TURN drafted the portions related to rates and takings analysis, Prison Policy Initiative drafted the portions about ancillary fees and site

<p>commissions, and CforAT drafted the portions about market power and interference with contracts. TURN, Prison Policy Initiative, and CforAT discussed the concerns with Cal Advocates; Cal Advocates submitted its own response and covered a subset of issues that Joint Consumers addressed. <i>Compare</i> Cal Advocates Response to Applications for Rehearing D.21-08-037 (Oct. 7, 2021) <i>with</i> TURN, Prison Policy Initiative, and Center for Accessible Technology Opposition to Applications for Rehearing D.21-08-037 (Oct. 7, 2021)(discussing in addition to issues raised by Cal Advocates, takings analysis, market power, and interference with contracts).</p> <p>TURN submits that its combined efforts with Joint Consumers resulted in a net savings of resources for each organization compared to if each organization tried to tackle the same issues alone.</p> <p><b>Court of Appeals work.</b> As the time records reflect, as a real party in interest, TURN reviewed the documents served in <i>Securus Technologies, LLC v. Public Utilities Com.</i>, No. B320207 (Cal. App. 2nd Dist., Feb. 1, 2023) (<i>unpublished</i>), (Cal. App. 2nd Dist., Feb. 27, 2023) (<i>published</i>) [2023 Cal. App. LEXIS 133] and participated in strategy and coordination calls but ultimately concluded that it was unnecessary to separately file an answer or present oral arguments. Instead, TURN deferred to the Commission’s Appellate Division to defend the Commission’s decision rather than to duplicate efforts at various intervals of the Court of Appeals process. TURN submits that this approach resulted in a net savings of resources for both the Commission and TURN compared to if each organization addressed the same issues and completed the same tasks during the appellate process.</p>	
--	--

**C. Additional Comments on Part II: (use line reference # or letter as appropriate)**

#	Intervenor’s Comment	CPUC Discussion

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**  
**(to be completed by Intervenor except where indicated)**

**A. General Claim of Reasonableness (§ 1801 and § 1806):**

	<b>CPUC Discussion</b>
--	------------------------



**a. Intervenor’s claim of cost reasonableness:**

TURN’s request for intervenor compensation seeks an award of approximately \$304,828.75 as the reasonable cost for participation in the proceeding. Considering the scope and quality of TURN’s work, and the breadth and depth of benefits achieved through TURN’s participation in the proceeding, the Commission should have little trouble concluding that the amount requested is reasonable.

The Commission’s review of incarcerated person’s calling services was an issues of first impression, with many components that were novel before the Commission, and it has implications of service to some of California’s most vulnerable residents. For example, the Commission’s work on this proceeding built upon the work already done at the Federal Communications Commission and judicial orders and was influenced by work done in other states. For another example, the Commission found that the status quo for incarcerated person’s calling services caused significant harms to people who are low-income and disproportionately harmed people of color. Prior to the Commission’s adoption of interim rules in this proceeding, incarcerated person’s calling services providers charged varying yet exorbitant prices, resulting in incarcerated persons and their family members going into debt to stay in touch. Yet, staying connected with loved once reduced the rate of recidivism. TURN’s advocacy focused on bolstering the Commission’s jurisdiction to regulate rates and require consumer protections for incarcerated person’s calling services.

As is often the case for telecommunications proceedings in recent years, it is more difficult to quantify the dollar impacts of TURN’s work here than is the case in Commission proceedings addressing rates. Here, TURN’s advocacy helped achieve benefits that were clear and substantial, though hard to quantify. As discussed above, TURN’s efforts resulted in important interim relief for individuals incarcerated or detained and their families through the adoption of significantly lower voice calling rates and limited fees for incarcerated calling services for the first time in California. TURN’s efforts also resulted in some important in-language requirements that should be helpful for end users. This relief and the associated protections will provide direct financial benefits to these consumers, particularly in ESJ communities. Similarly, the efficient compliance requirements and notification measures adopted should help to ensure the companies’ compliance the rules, and thus increase the likelihood that the intended public benefits will be realized. TURN submits that such outcomes demonstrate benefits to incarcerated and detained individuals and their families that, though difficult to quantify, more than support a compensation award in the amount requested here.

<p>Therefore, TURN urges the Commission to find that TURN’s participation costs are reasonable considering the significant consumer benefits from the adopted interim relief for incarcerated calling services.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>TURN seeks compensation for approximately 472 hours that Brenda D. Villanueva devoted to substantive issues in this proceeding. Mrs. Villanueva was TURN’s lead attorney on almost all issues in this proceeding, including the novel issues pertaining incarcerated persons calling services, which was an topic of first impression before the Commission. To inform TURN’s advocacy on these novel issues, Mrs. Villanueva necessarily undertook research on communications services provided in California, which required research on the regulatory, legislative, and judicial ecosystem for communications services adopted or considered at the federal level by the Federal Communications Commission and in other states.</p> <p>Moreover, Mrs. Villanueva was the lead attorney to draft and negotiate nondisclosure agreements and data request, and to review responses to data requests submitted by TURN or other advocates. Mrs. Villanueva analyzed the rulings and staff proposal in this phase and was the primary drafter for TURN’s comments, under the supervision of Ms. Mailloux, TURN’s managing director during the time of this phase 1. Except for the prehearing conference in 2020, Mrs. Villanueva represented TURN in front of the Commission during ex parte meetings with Commission offices, and in phone call and email exchanges with Communications Division Staff. In addition, Mrs. Villanueva served as a resource for champions wishing to participate in the CPUC proceeding by presenting at various stakeholder meetings with champions organized by TURN organizing professionals. Furthermore, Mrs. Villanueva coordinated a team of advocates to draft the joint response to NCIC and Securus’ respective applications for rehearing. She drafted sections on rates and provided record research support to help the Commission identify the evidence in the record to rebut claims provided in the applications for rehearing.</p> <p>TURN seeks compensation for approximately 169 hours that TURN Telecom Director Christine Mailloux dedicated to help draft filings or sections of the response to the applications for rehearing related to jurisdiction over VoIP, and IP-enable services, and related to takings arguments. During the time covered by this compensation request, Ms. Mailloux has not only supported the work of Mrs. Villanueva and the Joint Consumer coalition but has also dedicated resources herself to represent TURN at the pre-hearing conference, dedicated hours to working with champions and Communications Division Staff, and contributed to several pleadings in response to comprehensive ACRs and ALJ Rulings. She also facilitated intervenor compensation workshop for subject matter champions</p>	

that wished to participate in the CPUC Intervenor Compensation program in furtherance of their active advocacy in this proceeding given the OIR's goal to invite these stakeholders.

TURN seeks compensation for approximately 48 hours for TURN Organizing and Advocacy Campaign Director Jorge Rivera to research and to identify champions with a considerable knowledge of communications services for incarcerated persons in California prisons, jails, detention centers, and other carceral institutions. Mr. Rivera's research and identification was instrumental in informing TURN's work and positions on the issues of first impression before the Commission and allowed TURN to be a resource to the Communications Division Staff in this proceeding. The Commission recognized that the services subjected to this proceeding were issues of first impressions. As a result, TURN needed to efficiently conduct research efforts to learn about the various communications service issues for incarcerated persons and that the best path forward was to bring expert subject matter experts to the Commission, groups with real-world experience. TURN provides two examples below.

For example, at the request of Communications Division staff, Mr. Rivera identified subject matter champions and secured meeting dates with Communications Division staff to discuss communication services in juvenile facilities and in adult facilities on January 25, 2021, and January 26, 2021, respectively. Mr. Rivera drafted a proposed agenda and facilitated meeting logistics to efficiently create a setting for Communication Division staff to learn from subject matter champion in each of the areas that staff identified. *See* TURN Claim Attachment 5. This effort facilitated a real-time dialogue about issues such as access to counsel, service reliability, and payment and billing structures for communications services for incarcerated persons in California facilities. This dialogue saved Communications Division staff and TURN advocates' time and resources.

Another example, Mr. Rivera's efforts to identify and facilitate subject matter expertise in the carceral system process was an instrumental in establishing a fairer process for incarcerated persons currently in California carceral facilities to fully participate in the proceeding's two-day public participation hearings. Through Mr. Rivera's collaboration with other champions, he identified privacy, safety, and accessibility concerns and raised them with the Commission in time to revise the public participation hearing instructions and establish a path in which the identity of callers who feared retribution for offering public participation testimony, could be protected. *See* TURN Claim Attachment 6. This direct contribution can be examined by the many public participation participants that joined the

public participation hearings over the course of two days. Over 90 people provided testimonials during the two-day conference, ten of the participants identified themselves as currently or formerly incarcerated. *See* D.21-08-037 at pp. 11-12, 14-15. The Commission’s decision cites to these testimonials as did many parties. *See* D.21-08-037 at pp. 11-12, 14-15, 73, TURN Opening Comments to Staff Proposal at pp. 6, 15, 18 (April 30, 2022); TURN Reply Comments to Staff Proposal at pp. 2, 4, 9, 14, 17 (May 12, 2021); Public Advocates Reply Comments to Staff Proposal at p. 3 (May 12, 2021).

TURN seeks compensation for approximately 25 hours dedicated by TURN Organizing Director Constance Slider Pierre in this proceeding. Due to the nature of the issues of first impression in this proceeding and the need to work with a myriad of champions to inform TURN’s work in the proceeding, TURN found it necessary for Ms. Slider Pierre to support Mr. Rivera’s work in this proceeding, as described in the examples above and shown in TURN Claim Attachments 5 and 6.

TURN Director of Race and Equity Gabriela Sandoval dedicated only a few hours to help equity issues, such as elements to support more action in furtherance of the Commission’s ESJ Action Plan and in-language requirements in response to the proposed decision.

TURN Telecom Staff Attorney Ashley Salas dedicated only a few hours to help with the compensation request.

### *Research*

As the Commission recognized in the October 19, 2020, Order Instituting Rulemaking (OIR), the Commission has not previously regulated the rates of telephone services for incarcerated persons in California prisons and jails and has not reviewed the contracts for these services. *See* OIR at 4-6. These communications services provided in these carceral settings are novel issues for the Commission. In fact, the Commission acknowledged that its work here would build off prior work by the Federal Communications Commission (FCC), and the approaches seen in other states. *See* OIR at pp. 4-6; Scoping Memo at pp. 1-3, 11-18 (discussing FCC); and 18-19 (discussing states). The Scoping Memo directly sought comment on whether the “FCC regulations over interstate and international calls [should] inform the Commission’s approach to intrastate inmate communication services” and whether the Commission should “use some elements of FCC orders but not others as models for ensuring just and

reasonable, and affordable, inmate communication services rates in California.” Scoping Memo at 25 (Phase I question 4).

Therefore, to comprehensively advocate for reasonable solutions for California, TURN advocates reviewed FCC precedent establishing rules and rates for calling services for incarcerated persons, and the FCC’s various information collection materials. *See* FCC, Rates for Interstate Inmate Calling Services Rates for Interstate Inmate Calling Services, WC Docket No. 12-375. Both sets of FCC workstreams required TURN advocates to have familiarity of more than seven years of FCC decisions and a DC Circuit court opinion, some of which changed during the course of the Commission’s Phase 1 work. *See e.g.* FCC, Rates for Interstate Inmate Calling Services Rates for Interstate Inmate Calling Services, Third Report and Order, Order on Reconsideration, and Fifth Further Notice of Proposed Rulemaking, WC Docket No. 12-375, FCC 21-60 (FCC 2021).

Relatedly, the Commission’s OIR and the proceeding’s Scoping Memo recognized the importance of the work completed or considered in the California legislature and in other states to address the high rates and costs for communication services for incarcerated persons. *See* OIR at p. 4; Scoping Memo at 3-4. Therefore, TURN advocates researched the solutions considered in the California Legislature and in other states to address the rates for communications services for incarcerated persons. TURN found legislative, regulatory, and other means to address rates for these communication services as a result of the research.

Consequently, to understand these novel concepts, to review the sources referenced by the Commission, and to address the questions in rulings, TURN advocates researched California legislation, other states’ legislation and regulation, FCC rules in its ongoing proceeding, and judicial decisions. Time for this research is coded as RES.

#### *Coordination*

As referenced in the “research” discussion above, the communications services for incarcerated persons are novel issues for the Commission. The structure for these services has largely operated through a separate set of state or local agencies via bids and contracts and not the Commission. However, champions for communications services for incarcerated persons have a chaptered history of serving incarcerated persons and their families in California and an intimate knowledge of communications services for these families in various carceral settings in California-prisons, jails, detention centers, court jails, minor-serving institutions, among others. Other champions have knowledge of these services and how they are reviewed or regulated in other states.

In addition to these champions serving as a resource to inform TURN's work, TURN worked with Communications Division to bring these champions' knowledge-base of communication services for incarcerated persons into the record of the Commission's proceeding. A significant number of these champions had no experience with the Commission or the Commission's rulemaking process. Therefore, TURN's organizing team coordinated the targeted and repeated outreach and education efforts throughout the course of this phase for these champions to inform the Commission's record. *See* TURN Claim Attachments 5 and 6. The TURN policy team provided process guidance at various stages of this phase and as a result, facilitated the party status and active involvement of several champions with little to no experience with Commission process. *See e.g.*, Root and Rebound OIR Opening Comments (Nov. 9, 2020); Returning Home Foundation Motion for Party Status (Dec. 8, 2020). Moreover, at the request of the Administrative Law Judge, TURN served as a resource for new and interested intervenors and conducted a special curated training for interested champions to participate in the Commission's Intervenor Compensation Program.

In addition, TURN worked with Communications Division to establish logistics and settings for potential participants for the Commission's two-day public participation hearings (PPH). This included a deliberate effort to facilitate the participation of individuals currently detained in California carceral facilities, without fear of retribution or retaliation. The time for this work is coded as ORG, COOR, PROC, and CD.

### *Discovery*

As referenced in the "research" discussion above, the communications services for incarcerated persons are novel issues for the Commission. This means that not all the service providers for communications services for incarcerated persons were not very familiar with the Commission's discovery rules and process, prior this proceeding. Relatedly, at the federal level, the FCC proceeding had several rounds of rulemakings completed that included a protective order for material submitted to the FCC. TURN spent considerable resources and time to review the FCC rules and protective order and to attempt to negotiate separate nondisclosure agreements for purposes of the Commission's proceeding with the parties that are the four of the largest service providers of communications services for incarcerated persons in California. Several attempts were made to execute a nondisclosure agreement with these parties that were service providers for communication services for incarcerated persons in California. Only a subset of these efforts resulted in an executed



<p>nondisclosure agreement with a service provider for these services in California.</p> <p>TURN advocates also spent resources to draft and deliver data requests to the majority of service providers for these services in California; only a subset of these providers responded. TURN reviewed the responses to data requests that TURN submitted and that Cal Advocates submitted to a subset of service providers. In addition, TURN reviewed other parties' efforts to seek responses to data requests from parties in the Commission's proceeding, and reviewed the Administrative Law Judges' response to these parties' efforts. <i>See</i> Administrative Law Judge and Assigned Commissioner's Ruling Compelling Production of Documents (Sep. 13, 2021). The time for this work is coded as "DR."</p> <p><b><u>Intervenor Compensation-Related Time</u></b></p> <p>TURN is requesting compensation for 15.75 hours devoted to compensation-related matters. Of these hours, 1.75 hours were devoted to the preparation of the Notice of Intent to Claim Intervenor Compensation; TURN submits that this is a reasonable amount of time given that this was Mrs. Villanueva's first time preparing an NOI.</p> <p>Moreover, as the time record reflects, Ms. Salas prepared a portion of the compensation claim in 2022 given her availability and experience in claim preparation. Ultimately, TURN decided to wait to submit the claim until the Court of Appeals issued its opinion related to the writ of review of the underlying Commission decision adopting interim relief. Since the Court of Appeals issued its opinion and later published this opinion upholding the Commission's underlying decision in early 2023, Mrs. Villanueva completed the remaining portion of the compensation claim in 2023 because she has been the lead attorney for TURN in this proceeding.</p>			
<b>c. Allocation of hours by issue:</b>			
RES	<b>Research</b> – Research work about incarcerated calling services and related new issues before CPUC, which was necessary to inform TURN's strategy in this proceeding, such as intrastate services, ancillary fees, mixed-jurisdictional calls, regulatory and legislative approaches in other states and at the federal level, and customer experiences in California.	<b>8.60%</b>	
OIR	<b>Order Instituting Rulemaking</b> – Analysis of the OIR and the various issues, drafting comments and reply comments, and advocacy on OIR issues, .	<b>17.83%</b>	
JUR	<b>Jurisdiction</b> – Advocacy regarding the CPUC's jurisdiction to promulgate rules regarding incarcerated calling services.	<b>2.09%</b>	



ORG	<b>Organizing</b> – Internal work to conduct outreach, coordinate, and organize TURN stakeholders of incarcerated calling champions to advocate before the CPUC in furtherance of the CPUC OIR’s efforts to engage a broad range of prison phone justice advocates new to the CPUC process. TURN does not believe allocation of these entries is required, but if the Commission chooses to allocate these entries to specific issues they would roughly break down as: OIR – 10%; PHC – 20%; PPH - 30%; STAFF – 20%; PD – 20%.	<b>7.31%</b>
COOR	<b>Coordination of Effort</b> – External work to conduct outreach, coordinate, and organize TURN stakeholders of incarcerated calling champions to advocate before the CPUC in furtherance of the CPUC OIR’s efforts to engage a broad range of prison phone justice advocates new to the CPUC process. TURN does not believe allocation of these entries is required, but if the Commission chooses to allocate these entries to specific issues they would roughly break down as: OIR – 10%; PHC – 20%; PPH -30%; STAFF – 20%; PD – 20%.	<b>5.26%</b>
PROC	<b>Procedural Assistance</b> – Work to assist incarcerated calling champions new to CPUC procedure, on CPUC-specific procedural matters; including, but not limited to, acquiring party status, filing notice of intent to request intervenor compensation, and logistics and advocacy in favor of public participation hearings.	<b>4.98%</b>
CD	<b>Communications Division</b> – Work with Communications Division to assist the Communications Division staff’s access to incarcerated calling champions new to the CPUC. TURN does not believe allocation of these entries is required, but if the Commission chooses to allocate these entries to specific issues they would roughly break down as: PROC – 5%; COOR – 5%; PHC – 5%; PHH - 75%; STAFF – 5%; PD – 5%.	<b>4.39%</b>
PHC	<b>Pre-Hearing Conference</b> – Work strategizing and participating in the pre-hearing conference.	<b>2.68%</b>
DR	<b>Discovery</b> – Work to draft and negotiate discovery requests and non-disclosure agreements, and to review FCC protective order; to address motion to compel; and to access and address confidentiality issues.	<b>8.11%</b>

PPH	<b>Public Participation Hearing</b> – Work to advocate for holding public participation hearings in this proceeding and advancing concerns to facilitate logistics to enable the confidential and safe participation of individuals incarcerated or detained inside of California carceral facilities and their families, without fear of retribution, in furtherance of the robust development of the Commission’s record.	<b>2.54%</b>
STAFF	<b>Staff Proposal</b> – Analysis, advocacy, organizing, and filing comments regarding the scoping memo and staff proposal for interim incarcerated calling rules and relief.	<b>12.53%</b>
PD	<b>Proposed Decision</b> – Advocacy, organizing, and filing comments and attending ex parte meetings regarding interim incarcerated calling rules and relief.	<b>11.98%</b>
EQU	<b>Equity</b> – Advocacy to address equity issues in the Interim Rules Proposed Decision (see PD code), such as impact to ESJ communities and special in-language considerations.	<b>0.77 %</b>
AFR	<b>Application for Rehearing</b> – Advocacy to address two applications for rehearing of the Interim Rules Proposed Decision; work to coordinate a joint response with Joint Consumers and to collaborate with Cal Advocates.	<b>9.09%</b>
APP	<b>Appellate Efforts</b> - Review of writ submitted to Court of Appeals on the Commission’s underlying decisions in Phase 1, and participation in strategy and coordination calls with the Commission’s Appellate Division.	<b>1.01%</b>
#	<b>Combined Efforts</b> – Time entries that cover substantial work that cannot easily be identified with a specific activity code. Those identified with “#” are generally associated with work spent on multiple, interrelated issues to create a record for this phase of the proceeding. TURN attempted to identify each entry with a specific code and therefore entries with a “#” are limited. TURN does not believe allocation of these entries is required, but if the Commission chooses to allocate these entries to specific issues they would roughly break down as: PHC – 30%; STAFF – 30%; PD – 30%; COOR – 10%.	<b>0.84%</b>
COMP	<b>COMP</b> – Work spent on compensation request related matters.	

		<b>100%</b>	
--	--	-------------	--

**B. Specific Claim:\***

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Brenda Villanueva	2020	175.75	\$350.00	New Rate. See Comment 1.	\$61,512.50			
Brenda Villanueva	2021	289.00	\$410.00	D.22-06-038	\$118,490.00			
Brenda Villanueva	2022	5.25	\$465.00	Res. ALJ-393, 2021 Rate plus increase for role change See Comment 1	\$2,441.25			
Brenda Villanueva	2023	2.00	\$510.00	Res. ALJ-393, 2022 Rate plus 4.5% COLA plus 5% step increase See Comment 1	\$1,020.00			
Christine Mailloux	2020	69.50	\$510.00	D.20-12-040	\$35,445.00			
Christine Mailloux	2021	99.75	\$700.00	D.22-05-026	\$69,825.00			
Jorge Rivera	2020	25.00	\$125.00	See Comment 2.	\$3,125.00			
Jorge Rivera	2021	23.25	\$125.00	See Comment 2.	\$2,906.25			
Constance Slider Pierre	2020	12.50	\$200.00	D.22-07-019	\$2,500.00			
Constance Slider Pierre	2021	12.75	\$200.00	Res. ALJ-393 - New Rate. See Comment 3.	\$2,550.00			
Gabriela Sandoval	2021	3.25	\$450.00	Res. ALJ-393 - New Rate. See Comment 4.	\$1,462.50			
Subtotal: \$301,277.50						Subtotal: \$		
OTHER FEES								
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$

<b>Subtotal: \$</b>						<b>Subtotal: \$</b>		
<b>INTERVENOR COMPENSATION CLAIM PREPARATION **</b>								
<b>Item</b>	<b>Year</b>	<b>Hours</b>	<b>Rate \$</b>	<b>Basis for Rate*</b>	<b>Total \$</b>	<b>Hours</b>	<b>Rate</b>	<b>Total \$</b>
Ashley L. Salas	2022	7.00	\$207.50	Half of 2022 requested rate. See Comment 5.	\$1,452.50			
Brenda Villanueva	2021	1.75	\$205.00	D.22-06-038	\$358.75			
Brenda Villanueva	2022	2.00	\$232.50	Half of 2022 requested rate. See Comment 1.	\$465.00			
Brenda Villanueva	2023	5.00	\$255.00	Half of 2023 requested rate. See Comment 1.	\$1,275.00			
<b>Subtotal: \$3,551.25</b>						<b>Subtotal: \$</b>		
<b>COSTS</b>								
<b>#</b>	<b>Item</b>	<b>Detail</b>			<b>Amount</b>	<b>Amount</b>		
<b>Subtotal: \$0</b>						<b>Subtotal: \$</b>		
<b>TOTAL REQUEST: \$304,828.75</b>						<b>TOTAL AWARD: \$</b>		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors' records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate</p>								
<b>ATTORNEY INFORMATION</b>								

Attorney	Date Admitted to CA BAR <sup>4</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Brenda D. Villanueva	January 2021	334217	No
Christine Mailloux	December 1993	167918	No
Ashley L. Salas	December 2015	308374	No

**C. Attachments Documenting Specific Claim and Comments on Part III:**  
**(Intervenor completes; attachments not attached to final Decision)**

Attachment or Comment #	Description/Comment
Attachment 1	Certificate of Service
Attachment 2	Timesheet for TURN’s Advocates
Attachment 3	TURN Hours Allocated by Issue
Attachment 4	Resume for Jorge Rivera, 2020 Pre-TURN; Resume for Jorge River, 2023 Post-TURN
Attachment 5	Exhibit Communications Division meetings with subject matter champions, Phase 1
Attachment 6	Exhibit Advocacy to improve logistics of public participation hearings, Phase 1
Comment 1	<p><b>2020 Hourly Rate for Brenda D. Villanueva</b></p> <p>TURN filed an intervenor compensation claim in A.20-11-001 on January 14, 2022, that included a request that the Commission adopt an hourly rate of \$350 for TURN Attorney Brenda D. Villanueva in 2020. The Commission has yet to act upon that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Mrs. Villanueva, TURN refers the Commission to the showing presented in A.20-11-001.</p> <p><b>2022 Hourly Rate for Brenda D. Villanueva</b></p> <p>Mrs. Villanueva joined TURN as a Staff Attorney in October 2020, bringing with her six years of legal experience as a practicing attorney at the FCC, in addition to the telecom policy experience she gained through legal internships at the FCC, and during her nearly six years of working for the U.S. House of Representatives in Congressman Baca’s office. In D.22-06-038, the</p>

1. <sup>4</sup> This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

	<p>Commission agreed with TURN that Mrs. Villanueva should be considered a Level III Attorney under the hourly rate framework adopted in Resolution ALJ-393 and adopted an hourly rate of \$410 for her work at TURN in 2021. The Commission explained, “The hourly rate of \$410 places Villanueva midway between the range approved for attorneys with 5-7 years and is justified based on Villanueva’s 6 years of practice as an attorney. We approve the rate here. This leaves TURN significant room to justify an increase to Villanueva’s rate over the next four years within this level, as Villanueva’s expertise, tasks, and organizational responsibilities increase.” (D.22-06-038, pp. 59-60).</p> <p>Pursuant to the Commission’s invitation in D.22-06-038, TURN now seeks an increase to Mrs. Villanueva’s hourly rate in 2022 beyond the COLA that otherwise would apply. At the end of 2021, Mrs. Villanueva assumed the responsibilities held for many years by TURN Managing Attorney Christine Mailloux, who departed TURN. As of 2022, Mrs. Villanueva oversees TURN's telecommunications advocacy before the CPUC, FCC, NTIA, California Legislature and U.S. Congress, including sector-wide policy development, legislative and legal strategy, and supervision of TURN's telecommunications advocacy team. In addition to her own casework, she coordinates case prioritization, external government outreach, assignments, and workload management for TURN's telecommunications attorneys, experts, and analysts. She also works with TURN’s Race and Equity Team to provide impactful race impact analysis to all of TURN’s telecommunications advocacy.</p> <p>Given this significant expansion in Mrs. Villanueva’s expertise, tasks, and organizational responsibilities, TURN submits that a rate of \$465 is appropriate for her work in 2022. The Commission’s 2022 hourly rate range for a Level III Attorney is \$319.98 - \$536.62 (calculated as the 2021 range of \$309.76 - \$519.48 adjusted by the 3.3% COLA for 2022). The requested rate reasonably reflects Mrs. Villanueva’s significantly expanded responsibilities at TURN in 2022.</p> <p>TURN also requested a 2022 rate of \$465 for Mrs. Villanueva based on her expanded role at TURN in R.20-02-008. That claim, filed on July 22, 2022, shortly after the issuance of D.22-06-038, is currently pending.</p> <p>To avoid any confusion, TURN notes that a proposed decision in R.20-08-021 on the Commission’s agenda for April 6, 2023, would adopt a lower rate of \$425 for Mrs. Villanueva in 2022 based on a different rationale. The proposed decision in R.20-08-021 would arrive at a 2022 rate for Mrs. Villanueva by applying the 2022 annual escalation rate of 3.31% to her authorized 2021 rate of \$410. TURN did not request a 2022 rate in the R.20-08-021 claim based on Mrs. Villanueva’s role change because TURN filed the claim on April 25, 2022, before the issuance of D.22-06-038. Irrespective of the outcome in R.20-08-021, TURN requests that the Commission authorize a rate of \$465 for Mrs.</p>
--	---

	<p>Villanueva’s work in this proceeding in 2022 based on the justification provided here.</p> <p><b>2023 Hourly Rate for Brenda D. Villanueva</b></p> <p>TURN requests that the Commission adopt a 2023 hourly rate of \$510 for Brenda D. Villanueva.</p> <p>The 2023 rate requested by TURN is equal to the rate requested for Mrs. Villanueva’s work in 2022, adjusted by both the annual escalation methodology adopted in Resolution (Res.) ALJ-393 and the first 5% step increase for Mrs. Villanueva in the Attorney – Level III experience tier. The annual escalation rate for 2023 is 4.5%. <i>See <a href="https://www.bls.gov/news.release/eci.t05.htm">https://www.bls.gov/news.release/eci.t05.htm</a>.</i></p> <p>Res. ALJ-393 permits intervenor representatives to claim up to two 5% annual “step increases” within each labor role experience tier, as long as their final requested rate does not exceed the maximum approved rate for that experience level. (Res. ALJ-393, p. 5). The maximum approved rate for an Attorney – Level III is \$519.48 for work conducted in 2021, which escalates to \$560.77 in 2023 by applying the 3.3% 2022 COLA and then the 4.5% 2023 COLA.</p> <p>The requested 2023 rate for Brenda D. Villanueva of \$510 is below the maximum 2023 rate for an Attorney – Level III.</p>
<p>Comment 2</p>	<p><b>2020 Hourly Rate for Jorge Rivera</b></p> <p>This is TURN’s first request for compensation that includes work performed by Jorge Rivera, who joined TURN in October 2020 as the Southern California Organizer and shortly thereafter, assumed the role of TURN’s Organizing and Advocacy Campaign Director – Southern California. The Commission has not previously adopted an hourly rate for Mr. Rivera. TURN is requesting a rate of \$125 for Mr. Rivera’s work in 2020.</p> <p>In D.08-04-010, the Commission addressed the required showing for new intervenor representatives appearing before the Commission. The Commission instructed that the requested rate must be within the established range of rates for any given level of experience, and must take into consideration the rates previously awarded other representatives with comparable training and experience and who perform similar services. In Resolution ALJ-387, the Commission extended these requirements to requests for 2020 hourly rates for new representatives.</p> <p>Mr. Rivera arrived at TURN in 2020 with more than 13 years of experience providing direct social services and leading community organizing and advocacy</p>



	<p>campaigns to advance justice in disadvantaged communities. This experience informed his efforts in this proceeding to expand the Commission's ability to receive input directly from incarcerated and detained calling services individuals, families, and related experts, thereby improving the administrative record in foundational ways. Mr. Rivera has been an executive director, a program director, a program manager, a program coordinator, a community organizer, a case manager, and a community service worker. From 1997-2003, he provided direct services to vulnerable communities as a Program Manager and Inclusion Facilitator at Aspira Foster Family Agency; a Program Director at Wings of Refuge Foster Family Agency; and a Case Manager for Early Childhood Services at Harbor Regional Center. From 2011-2012, he served as a Community Service Worker for the City of Long Beach, Development Services. From 2013 until joining TURN in 2020, Mr. Rivera developed and supported programs and campaigns to advance the policy goals of the organizations and communities he has served. He worked as a Community Organizer for Housing Long Beach; an Outreach Coordinator for Long Beach Community Action Partnership; a Founder and Program Director for Long Beach Residents Empowered (LiBRE); and the Southern California Regional Coordinator for Tenants Together. In early 2020, Mr. Rivera founded and began serving as the Executive Co-Director of The People's Resource Center / Healing Justice Center, where he oversees the Tenant Hotline and develops and helps to implement local, statewide, and national social justice campaigns to support community empowerment, family wellness, and healthy housing. He continued his work with The People's Resource Center throughout his time at TURN. Mr. Rivera has a Bachelor of Arts in Psychology/Philosophy from California State University, Long Beach. His resume is included in TURN Claim Attachment 4.</p> <p>The requested hourly rate of \$125 is far below the bottom of the range for 2020 rates adopted by the Commission in Resolution ALJ 387 for experts with 13+ years of experience, which is \$190-\$465. The requested rate is also far below the bottom of the range for 2020 rates for experts with 0-6 years of experience, \$160-\$225.</p> <p>Further, the requested rate is lower than hourly rates previously adopted by the Commission for community advocates and community organizers with similar experience to Mr. Rivera's. In D.22-04-019, the Commission adopted an hourly rate of \$185 for Refugio Valencia in 2018. Mr. Valencia had worked as a community advocate for more than fifteen years at that time and was currently serving as a Community Organizer for the Center on Race, Poverty &amp; the Environment. (D.22-04-019, p. A4). In D.18-10-051, the Commission authorized a rate of \$175 for Strela Cervas in 2016 (and extended the 2016 rate to her work in 2017 and 2018 in that proceeding). Ms. Cervas had 18 years of community advocacy experience at that time and had been the California Environmental Justice Alliance's Statewide Organizer Director since 2017. (D.18-10-051, p. 26). While Mr. Rivera has 13+ years of community advocacy experience, compared to Mr. Valencia's 15+ years and Ms. Cervas's 18+ years,</p>
--	---

the requested 2020 hourly rate for Mr. Rivera (\$125) is also significantly lower than the rate authorized for Valencia (\$185 in 2018) and Cervas (\$175 in 2016-2018).

For all of these reasons, TURN submits that \$125 is a very reasonable rate for Mr. Rivera in 2020.

### **2021 Hourly Rate for Jorge Rivera**

In Resolution (Res.) ALJ-393, the Commission adopted a new methodology for setting Intervenor Compensation hourly rates, based on a Market Rate Study. The new methodology defines comparable hourly rates for seventy-nine intervenor “labor roles,” at five levels of experience and education. For each level, a market rate-based hourly rate range is established. The Commission directed intervenors “to use the Hourly Rate Chart spreadsheet available on the Commission’s ICOMP website ([www.cpuc.ca.gov/icomps](http://www.cpuc.ca.gov/icomps)) to determine the appropriate hourly rate when completing claims for work performed on or after January 1, 2021.” (Res. ALJ-393, pp. 3-4). The Commission clarified that hourly rates for 2021 will be based on the approved hourly rate ranges in the Market Rate Study, without regard to previously established hourly rates for 2020 or prior years. (Res. ALJ-393, p. 4). Finally, the Commission directed intervenors to submit, in their first claim seeking compensation for work completed in 2021 and beyond, the following information to establish hourly rates: (1) a current resume as a supporting document, and (2) a justification for the requested rate that ties to the individual’s labor role and level of experience, per the Market Rate Study’s Hourly Rate Chart. (Res. ALJ-393, p. 5).

Pursuant to the requirements of ALJ-393, TURN hereby submits its request for a 2021 hourly rate for Jorge Rivera, who served as TURN’s Organizing and Advocacy Campaign Director – Southern California until April 2022.

### **Request for 2021 Hourly Rate Pursuant to Resolution ALJ-393**

**Intervenor Representative:** Jorge Rivera

**Labor Role:** Advocate – Not Otherwise Classified

**Level:** IV

**2021 Hourly Rate Range:** \$97.63 - \$185.17

**Requested Hourly Rate:** \$125

**Current Resume:** See TURN Claim Attachment 4

**Justification for the Requested Hourly Rate:**

Jorge Rivera joined TURN in October 2020 as the Southern California Organizer and shortly thereafter, assumed the role of TURN’s Organizing and Advocacy Campaign Director – Southern California until April 2022, when he

	<p>left TURN. Mr. Rivera coordinated TURN's organizing work in Southern California to support TURN's regulatory and legislative activities and provided counseling and training to members, community based organizations and allies. Mr. Rivera has a Bachelor of Arts in Psychology/Philosophy from California State University, Long Beach.</p> <p>Mr. Rivera arrived at TURN with more than 13 years of experience providing direct social services and leading community organizing and advocacy campaigns to advance justice in disadvantaged communities. From 1997-2003, he provided direct services to vulnerable communities as a Program Manager and Inclusion Facilitator at Aspira Foster Family Agency; a Program Director at Wings of Refuge Foster Family Agency; and a Case Manager for Early Childhood Services at Harbor Regional Center. From 2011-2012, he served as a Community Service Worker for the City of Long Beach, Development Services. From 2013 until joining TURN in 2020, Mr. Rivera developed and supported programs and campaigns to advance the policy goals of the organizations and communities he has served. He worked as a Community Organizer for Housing Long Beach; an Outreach Coordinator for Long Beach Community Action Partnership; a Founder and Program Director for Long Beach Residents Empowered (LiBRE); and the Southern California Regional Coordinator for Tenants Together. In early 2020, Mr. Rivera founded and began serving as the Executive Co-Director of The People's Resource Center / Healing Justice Center, where he oversees the Tenant Hotline and develops and helps to implements local, statewide, and national social justice campaigns to support community empowerment, family wellness, and healthy housing. He continued his work with The People's Resource Center throughout his time at TURN. In TURN Claim Attachment 4, TURN provides two versions of Mr. Rivera's resume, including the version he provided to TURN in 2020 and his current resume including TURN, as the older version includes a more complete history of relevant employment before TURN.</p> <p>The Market Rate Study Hourly Rate Chart instructs that an Advocate – Not Otherwise Classified is used for advocate roles that are not better classified as one of the more detailed roles, including for example consumer advocates, and may also be used for advocates that fill multiple sub-roles. The Hourly Rate Chart further requires a Level IV Advocate – Not Otherwise Classified to have a Bachelor's Degree and 10-15 years of experience.</p> <p>Mr. Rivera satisfies all of these requirements. He has a Bachelor's Degree and, as of the beginning of 2021, more than 13 years of experience advocating for disadvantaged individuals and communities in many different advocacy capacities. He has been an executive director, a program director, a program manager, a program coordinator, a community organizer, a case manager, and a community service worker. For this reason, TURN submits that the Commission should consider Mr. Rivera a Level IV Advocate – Not Otherwise</p>
--	--

	<p>Classified for the purpose of setting an hourly rate for his work before the Commission on behalf of TURN.</p> <p>Given Mr. Rivera’s experience, TURN submits that an hourly rate of \$125 is very reasonable for his work before the Commission in 2021. This rate is lower than the median rate of \$137.79 for a Level IV Advocate – Not Otherwise Classified.</p>
Comment 3	<p><b>2021 Hourly Rate for Constance Slider Pierre</b></p> <p>TURN requests a 2021 hourly rate of \$200 for TURN Organizing Director Constance Slider Pierre.</p> <p>TURN previously filed an intervenor compensation claim in A.21-11-017 on August 8, 2022, that included a request that the Commission adopt an hourly rate of \$205 for Ms. Slider Pierre in 2022 pursuant to Resolution ALJ-393. At that time, TURN had not requested an hourly rate for Ms. Slider Pierre’s work in 2021. TURN accordingly presented the showing required by Resolution ALJ-393 in seeking a 2022 hourly rate for Ms. Slider Pierre.</p> <p>In this claim, TURN requests an hourly rate of \$200 for Ms. Slider Pierre’s work in 2021 based on the showing presented in TURN’s claim in A.21-11-017. This rate is equal to the 2022 rate requested for Ms. Slider Pierre in A.21-11-017, \$205, reduced by the 2022 escalation rate of 3.3% authorized by the Commission. TURN submits that an hourly rate of \$200 is reasonable for Ms. Slider Pierre’s work in 2021 based on the showing presented in A.21-11-017.</p>
Comment 4	<p><b>2021 Hourly Rate for Gabriela Sandoval</b></p> <p>TURN filed an intervenor compensation claim in R.21-02-014 on August 30, 2021, that included a request that the Commission adopt an hourly rate of \$450 for TURN Expert Gabriela Sandoval in 2021, based on the Market Rate Study and guidance adopted in Res. ALJ-393. The Commission has yet to act upon that intervenor compensation claim. Rather than repeat the same showing here for the requested hourly rate for Dr. Sandoval, TURN refers the Commission to the showing presented in R.21-02-014.</p>
Comment 5	<p><b>2022 Hourly Rate for Ashley L. Salas</b></p> <p>TURN filed an intervenor compensation claim in R.20-08-021 on April 25, 2022, that included a request that the Commission adopt an hourly rate of \$415 for TURN Attorney Ashley L. Salas in 2022. As of the date of this claim, the Commission is set to consider TURN’s intervenor compensation claim in R.20-08-021 filed on April 25, 2022, on the Commission’s April 6, 2023 meeting agenda. The Commission is scheduled to consider adopting an hourly rate for</p>

	2022 for TURN Attorney Ashley L. Salas of \$415. Rather than repeat the same showing here for the requested hourly rate for Ms. Salas, TURN refers the Commission to the initial showing that TURN presented in R.20-08-021.
--	--

**D. CPUC Comments, Disallowances, and Adjustments *(CPUC completes)***

Item	Reason

**PART IV: OPPOSITIONS AND COMMENTS**

**Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))**

<b>A. Opposition: Did any party oppose the Claim?</b>	
---	--

If so:

Party	Reason for Opposition	CPUC Discussion

<b>B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?</b>	
--	--

If not:

Party	Comment	CPUC Discussion

***(Green items to be completed by Intervenor)***

**FINDINGS OF FACT**

1. **THE UTILITY REFORM NETWORK** [has/has not] made a substantial contribution to D.21-08-037 and D.22-04-038.
2. The requested hourly rates for **THE UTILITY REFORM NETWORK**'s representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$\_\_\_\_\_.

### **CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

### **ORDER**

1. **THE UTILITY REFORM NETWORK** shall be awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay **THE UTILITY REFORM NETWORK** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **THE UTILITY REFORM NETWORK** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data is unavailable, the most recent [industry type, for example, electric] revenue data shall be used.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75<sup>th</sup> day after the filing of **THE UTILITY REFORM NETWORK**’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.
4. This decision is effective today.

Dated \_\_\_\_\_, at San Francisco, California.

## APPENDIX

### Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	
Contribution Decision(s):	D.21-08-037, D.22-04-038		
Proceeding(s):	R.20-10-002		
Author:			
Payer(s):			

### Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
<b>THE UTILITY REFORM NETWORK</b>	March 30, 2023	\$304,828.75		N/A	

### Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Brenda	Villanueva	Attorney	\$350	2020	
Brenda	Villanueva	Attorney	\$410	2021	
Brenda	Villanueva	Attorney	\$465	2022	
Brenda	Villanueva	Attorney	\$510	2023	
Christine	Mailloux	Attorney	\$510	2020	
Christine	Mailloux	Attorney	\$700	2021	
Jorge	Rivera	Expert	\$125	2020	
Jorge	Rivera	Expert	\$125	2021	
Constance	Pierre	Expert	\$200	2020	
Constance	Pierre	Expert	\$200	2021	
Gabriela	Sandoval	Expert	\$450	2021	
Ashley	Salas	Attorney	\$415	2022	

(END OF APPENDIX)



**Attachment 1**

**Certificate of Service**

(Filed electronically as a separate document pursuant to Rule 1.13(b)(iii))

(Served electronically as a separate document pursuant to Rule 1.10(c))

**Attachment 2**

Daily Time Records for Attorneys and Experts

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Ashley Salas	R20-10-002	COMP	Review timesheets and code hours	6/6/2022	2.00
Ashley Salas	R20-10-002	COMP	Review timesheets and code hours; email disc w/ BV, GS, RAP, HG RE same	6/7/2022	1.00
Ashley Salas	R20-10-002	COMP	Draft compensation request - all sections	6/8/2022	2.00
Ashley Salas	R20-10-002	COMP	Edit and revise draft comp request	6/9/2022	1.00
Ashley Salas	R20-10-002	Comp	Comp Request - draft, edit, and revise comp request	6/10/2022	1.00
Brenda D. Villanueva	R20-10-002	RES	background research on inmate calling	10/12/2020	0.50
Brenda D. Villanueva	R20-10-002	OIR	review Inmate Calling OIR decision and prepare internal memo	10/12/2020	2.00
Brenda D. Villanueva	R20-10-002	OIR	Continued review of Inmate Calling OIR and the preparation of internal memo	10/12/2020	1.50
Brenda D. Villanueva	R20-10-002	OIR	Follow up discussion with C. Mailloux, re: inmate calling proceeding memo, case strategy	10/13/2020	0.25
Brenda D. Villanueva	R20-10-002	OIR	Continued review of Inmate Calling OIR and the preparation of internal memo	10/13/2020	1.25
Brenda D. Villanueva	R20-10-002	OIR	brief discussion with R. Costa, re: inmate calling	10/13/2020	0.25
Brenda D. Villanueva	R20-10-002	OIR	Continued review of Inmate Calling OIR and the preparation of internal memo	10/13/2020	2.00
Brenda D. Villanueva	R20-10-002	RES	Reviewed DC Circuit 2017 decision, re: federal inmate calling regulations; reviewed Iowa recent inmate calling decision	10/14/2020	1.00
Brenda D. Villanueva	R20-10-002	RES	Continued preparation of internal memo, reviewed FCC 2020 decision	10/14/2020	2.50
Brenda D. Villanueva	R20-10-002	OIR	Drafted and submitted for review to C. Mailloux, re: proceeding memo including a recommended strategy	10/14/2020	1.25
Brenda D. Villanueva	R20-10-002	RES	checked status of FCC inmate calling proceeding, sent update to R. Costa	10/15/2020	0.25
Brenda D. Villanueva	R20-10-002	RES	reviewed new FTC action on inmate calling scam and shared with team	10/16/2020	0.25
Brenda D. Villanueva	R20-10-002	COOR	provided status update of proceeding to C. Leanza of the United Church of Christ, OC inc.	10/16/2020	0.25
Brenda D. Villanueva	R20-10-002	RES	Call with C. Mailloux, re: strategy for legal research on FCC precedent, public advocacy opportunities, feedback on memo	10/19/2020	2.00
Brenda D. Villanueva	R20-10-002	JUR	researched jurisdiction and state developments questions to include in strategy memo	10/19/2020	3.00
Brenda D. Villanueva	R20-10-002	RES	reviewed inmate calling regulations in Alabama, New York, and New Mexico	10/20/2020	1.50
Brenda D. Villanueva	R20-10-002	ORG	coordinated internal meeting for public participation with external advocacy groups	10/21/2020	0.25
Brenda D. Villanueva	R20-10-002	RES	researched service provider classification at the federal level and at the state level	10/21/2020	2.00
Brenda D. Villanueva	R20-10-002	ORG	coordinated strategy call with internal team to prep for public participation event	10/21/2020	0.50
Brenda D. Villanueva	R20-10-002	RES	researched and sent findings to C. Mailloux, re: state model penal codes regulating inmate calling, CA inmate calling legislation vetoed 2020, reviewed service provider classification	10/21/2020	3.50
Brenda D. Villanueva	R20-10-002	OIR	met with C. Mailloux to discuss 2020 inmate calling legislation and legal strategy	10/22/2020	0.50
Brenda D. Villanueva	R20-10-002	ORG	briefed internal outreach team regarding legal research and industry findings, and proceeding strategy, coordinated approach for public participation event	10/22/2020	1.50
Brenda D. Villanueva	R20-10-002	COOR	emails w/ CforAT (MK), re: coordination strategy with TURN and CforAT	10/22/2020	0.25
Brenda D. Villanueva	R20-10-002	COOR	email w/ C. Leanza, re: group coordination	10/22/2020	0.25
Brenda D. Villanueva	R20-10-002	ORG	reviewed outreach email for public discussion event	10/22/2020	0.50
Brenda D. Villanueva	R20-10-002	ORG	researched criminal justice reform organizations, re: inmate calling advocacy	10/22/2020	1.00
Brenda D. Villanueva	R20-10-002	RES	reviewed state and county level contracts with inmate calling service providers and researched IEC and IER designations for large inmate calling service providers	10/22/2020	2.50
Brenda D. Villanueva	R20-10-002	RES	researched incarcerated service provider CPNC and ETC designations	10/23/2020	0.50
Brenda D. Villanueva	R20-10-002	JUR	call w/ C. Mailloux, re: inmate calling next steps, research and jurisdiction issues, email discussion, re: jurisdiction issues	10/23/2020	1.25
Brenda D. Villanueva	R20-10-002	ORG	call with C. Mailloux, re: community organizing and outreach prep (.25); email discussion with organizing team re: emails and upcoming meeting	10/23/2020	0.75
Brenda D. Villanueva	R20-10-002	RES	reviewed tariff documents for GTL and Securus	10/23/2020	1.50
Brenda D. Villanueva	R20-10-002	ORG	discussion w/ C. Mailloux, re: strategy coordination, group outreach event for comment submission	10/26/2020	0.75
Brenda D. Villanueva	R20-10-002	COOR	provided input to TURN public advocate groups event, re: evidence from state facilities of need for reforms	10/26/2020	0.50
Brenda D. Villanueva	R20-10-002	COOR	conf call w/ C. Mailloux and CFORAT, re: proceeding strategy	10/26/2020	0.75
Brenda D. Villanueva	R20-10-002	RES	reviewed recent state court decisions regarding inmate calling	10/26/2020	0.50
Brenda D. Villanueva	R20-10-002	OIR	drafted outline for TURN opening comments in response to OIR	10/26/2020	2.00
Brenda D. Villanueva	R20-10-002	ORG	discussion w/ G. Sandoval, re: group outreach event for comment submission	10/26/2020	0.25
Brenda D. Villanueva	R20-10-002	ORG	email collaboration with J. Rivera, re: group outreach event	10/26/2020	0.25
Brenda D. Villanueva	R20-10-002	ORG	reviewed revised agenda for TURN public group event	10/27/2020	0.25
Brenda D. Villanueva	R20-10-002	ORG	conf call w/ C. Mailloux and M. Toney, re: TURN public group event agenda and strategy	10/27/2020	0.75
Brenda D. Villanueva	R20-10-002	ORG	drafted public fact sheet for public group event, re: proceeding main points and context and methods to participate	10/27/2020	1.75
Brenda D. Villanueva	R20-10-002	OIR	drafted outline for opening comments, submitted draft to C. Mailloux	10/27/2020	2.00
Brenda D. Villanueva	R20-10-002	ORG	discussion w/ C. Mailloux, re: group outreach event materials	10/27/2020	0.50
Brenda D. Villanueva	R20-10-002	ORG	emails exchanges, re: agenda for group outreach event	10/28/2020	0.25
Brenda D. Villanueva	R20-10-002	ORG	provided sets of feedback to fact sheet for TURN group meeting	10/28/2020	1.00
Brenda D. Villanueva	R20-10-002	ORG	emails w/ CSP, JR, re: answered internal team questions regarding the scope of the facilities to be included	10/28/2020	0.50

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	RES	conducted legal research on prison justice work federally and in Nebraska, reviewed California list for Securus for OIR comments	10/28/2020	2.00
Brenda D. Villanueva	R20-10-002	RES	reviewed and sent impressions to C. Mailloux, re: Securus interexchange transmission service filings, specifically the California entries from Feb 2020	10/28/2020	1.50
Brenda D. Villanueva	R20-10-002	ORG	organizing logistics, production of background materials	10/29/2020	0.50
Brenda D. Villanueva	R20-10-002	OIR	discussed with C. Mailloux outline for comment and research strategy	10/29/2020	1.00
Brenda D. Villanueva	R20-10-002	COOR	participated in TURN public group event, presented CPUC proceeding overview	10/29/2020	1.00
Brenda D. Villanueva	R20-10-002	COOR	prepared remarks and later debriefed with team, re: TURN public group event	10/29/2020	1.75
Brenda D. Villanueva	R20-10-002	ORG	revised outreach documents for TURN public group event	10/29/2020	1.00
Brenda D. Villanueva	R20-10-002	COOR	followed up with WorthRises to schedule call	10/29/2020	0.25
Brenda D. Villanueva	R20-10-002	RES	researched service provider FCC submissions for service model information, and reviewed Alabama PSC inmate calling rulemaking for TURN OIR comments	10/29/2020	2.00
Brenda D. Villanueva	R20-10-002	OIR	reviewed feedback from C. Mailloux, re: opening comments outline and term clarification resources	10/30/2020	0.75
Brenda D. Villanueva	R20-10-002	JUR	wrote opening comments outline and conducted additional jurisdiction research	10/30/2020	1.50
Brenda D. Villanueva	R20-10-002	ORG	responded to emails regarding group outreach efforts	10/30/2020	0.25
Brenda D. Villanueva	R20-10-002	ORG	responded to emails regarding group outreach efforts	11/1/2020	0.25
Brenda D. Villanueva	R20-10-002	JUR	researched authority, drafted portions of TURN's opening comment, sent payphone research findings to C. Mailloux	11/1/2020	2.50
Brenda D. Villanueva	R20-10-002	COOR	Conf Call w/ TURN, S. Burrell of Pacific Juvenile Defender Center, D. Nong of Children's Defense Fund-California, B. Goldstein	11/2/2020	1.00
Brenda D. Villanueva	R20-10-002	ORG	conf call w/ C. Mailloux, J. Rivera, C. Slider Pierre, re: organizing and debrief session and planning for next organizing group meeting	11/2/2020	0.75
Brenda D. Villanueva	R20-10-002	COOR	email coordination for meeting with Worth Rises	11/2/2020	0.25
Brenda D. Villanueva	R20-10-002	RES	researched Securus FCC filings, re: business models/structure	11/2/2020	0.50
Brenda D. Villanueva	R20-10-002	OIR	drafted and researched sections for TURN opening comments, reviewed studies and material sent by juvenile justice groups	11/2/2020	4.00
Brenda D. Villanueva	R20-10-002	OIR	drafted and researched sections for TURN opening comments	11/3/2020	4.00
Brenda D. Villanueva	R20-10-002	JUR	email to C. Graziano of Iowa OCA, re: inmate calling jurisdiction and ICS providers background	11/3/2020	0.25
Brenda D. Villanueva	R20-10-002	JUR	email to C. Mailloux, R. Costa, A. Salas, re: jurisdiction issues and terms	11/3/2020	0.25
Brenda D. Villanueva	R20-10-002	OIR	meeting w/ TURN and Worth Rises, re: forthcoming draft opening comments and inmate calling issues	11/4/2020	1.00
Brenda D. Villanueva	R20-10-002	RES	call w/ C. Graziano of Iowa OCA, re: inmate calling service providers, Iowa approach	11/4/2020	0.75
Brenda D. Villanueva	R20-10-002	OIR	drafted TURN opening comments	11/4/2020	2.50
Brenda D. Villanueva	R20-10-002	OIR	call w/ C. Mailloux, re: debrief call with C. Graziano and Iowa's approach, strategy for opening comments, debrief issues with Worth Rises call	11/4/2020	1.00
Brenda D. Villanueva	R20-10-002	PROC	call w/ J. Rivera and emails with internal TURN group, re: PUC process questions for organizing groups	11/5/2020	1.50
Brenda D. Villanueva	R20-10-002	OIR	email w/ internal TURN group, re: confirm use of anecdotal information provided for the opening comments draft	11/5/2020	0.25
Brenda D. Villanueva	R20-10-002	OIR	research background material for opening comments draft	11/6/2020	1.00
Brenda D. Villanueva	R20-10-002	OIR	Review feedback from C. Mailloux, re: OIR opening comments draft	11/6/2020	0.50
Brenda D. Villanueva	R20-10-002	OIR	call w/ C. Mailloux, re: discuss feedback for opening comments draft, clarify litigation strategy on some issues, delegate revisions	11/6/2020	1.50
Brenda D. Villanueva	R20-10-002	OIR	revise TURN OIR opening comments draft	11/6/2020	4.00
Brenda D. Villanueva	R20-10-002	OIR	revise opening comments draft, reviewed public advocacy positions at the FCC, re: ancillary fees	11/7/2020	1.75
Brenda D. Villanueva	R20-10-002	OIR	call w/ C. Mailloux, re: opening comments drafting related questions	11/9/2020	0.75
Brenda D. Villanueva	R20-10-002	OIR	call w/ C. Mailloux, re: opening comment drafting and submission next steps	11/9/2020	0.50
Brenda D. Villanueva	R20-10-002	OIR	call w/ S. Green, re: opening comments submission/filing	11/9/2020	0.25
Brenda D. Villanueva	R20-10-002	OIR	drafting and editing opening comment	11/9/2020	5.00
Brenda D. Villanueva	R20-10-002	OIR	organized filled opening comments serviced and posted, and emailed groups that did not correctly distribute the opening comments, coordinated comment list with CforAT via several emails, asked S. Green some filing questions	11/10/2020	1.50
Brenda D. Villanueva	R20-10-002	OIR	call w/ C. Mailloux, re: discuss drafting reply comments and next steps strategy	11/10/2020	0.75
Brenda D. Villanueva	R20-10-002	ORG	call w/ Constance and Jorge, re: organizing strategy in anticipation of reply comments due, discussed agenda for second group meeting, and email to C. Mailloux, re: discussion notes from organizing call	11/10/2020	1.50
Brenda D. Villanueva	R20-10-002	OIR	reviewed and summarized opening comments submitted from industry commenters, sent GTL comment to C. Mailloux and CforAT	11/10/2020	2.50
Brenda D. Villanueva	R20-10-002	ORG	reviewed prepared survey form for group meeting, sent questions to organizing team	11/10/2020	0.50
Brenda D. Villanueva	R20-10-002	ORG	email to C. Mailloux, re: organizing meeting requests, agenda suggestions made after discussion with organizing team	11/10/2020	0.50
Brenda D. Villanueva	R20-10-002	OIR	reviewed and summarized opening comments from industry commenters, and emailed C. Mailloux a proposed schedule for summary, policy cut discussion, and outline	11/11/2020	3.50

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	OIR	reviewed and summarized opening comments from industry and criminal justice commenters	11/12/2020	6.00
Brenda D. Villanueva	R20-10-002	COOR	reviewed agenda material, prepped talking points, and attended meeting with external groups	11/12/2020	1.50
Brenda D. Villanueva	R20-10-002	ORG	email correspondence with C. Mailloux, re: impressions on the organizing group email regarding SB 555 and the CA Inmate Welfare Fund	11/12/2020	0.50
Brenda D. Villanueva	R20-10-002	ORG	call w/ C. Mailloux, re: strategy for organizing group meeting	11/12/2020	0.25
Brenda D. Villanueva	R20-10-002	ORG	emails w/ TURN internal team, organizing group followup and questions about the record	11/13/2020	0.50
Brenda D. Villanueva	R20-10-002	OIR	drafted comment summary of the record; email strategy for next steps to C. Mailloux	11/13/2020	3.00
Brenda D. Villanueva	R20-10-002	OIR	call w/ C. Mailloux, re: comment summary and outline/reply comment strategy	11/13/2020	0.75
Brenda D. Villanueva	R20-10-002	OIR	drafted outline for the reply comments to C. Mailloux	11/13/2020	1.50
Brenda D. Villanueva	R20-10-002	OIR	wrote OIR reply comments and incorporated feedback	11/14/2020	1.00
Brenda D. Villanueva	R20-10-002	OIR	drafted reply comments and incorporated feedback	11/15/2020	5.00
Brenda D. Villanueva	R20-10-002	OIR	drafted reply comments and incorporated feedback	11/16/2020	5.00
Brenda D. Villanueva	R20-10-002	OIR	drafted and submitted draft reply comments to C. Mailloux	11/16/2020	5.00
Brenda D. Villanueva	R20-10-002	ORG	organizing - responded to series of internal emails, analyzed proposed sign on letter, re: federal level advocacy	11/16/2020	1.00
Brenda D. Villanueva	R20-10-002	RES	email w/ D. Nong (Childrens Defense), re: resources for juvenile detention centers in preparation for OIR reply comments	11/16/2020	0.25
Brenda D. Villanueva	R20-10-002	OIR	emails w/ C. Mailloux, re: reviewed feedback provided to OIR reply comment draft and incorporated it into the next version	11/17/2020	2.50
Brenda D. Villanueva	R20-10-002	OIR	revised reply comment draft to incorporate feedback from C. Mailloux	11/18/2020	3.50
Brenda D. Villanueva	R20-10-002	OIR	revised OIR reply comment	11/19/2020	5.00
Brenda D. Villanueva	R20-10-002	OIR	call w/ C. Mailloux, re: discuss feedback, address lingering questions, and action plan to submit comments	11/19/2020	0.50
Brenda D. Villanueva	R20-10-002	PROC	emails w/ TURN Organizing team, re: organizing group filing and process to file late and shared the TURN reply comment with them	11/19/2020	0.50
Brenda D. Villanueva	R20-10-002	OIR	verified party replies and confirmed with other parties w/ C. Mailloux and CforAT	11/20/2020	0.25
Brenda D. Villanueva	R20-10-002	RES	read and sent emails to C. Mailloux; CforAT, re: FCC enforcement advisory and impressions for inmate service providers	11/20/2020	0.75
Brenda D. Villanueva	R20-10-002	ORG	call w/ C. Mailloux, re: organizing needs and logistics for next group meetings	11/25/2020	0.25
Brenda D. Villanueva	R20-10-002	ORG	call w/ J. Rivera, re: organizing meetings plan and outstanding requests	11/30/2020	0.50
Brenda D. Villanueva	R20-10-002	ORG	call w/ C. Slider Pierre, C. Mailloux, J. Rivera, G. Sandoval, re: agenda and discussion planned for 12/03 intervenor compensation workshop and other organizing needs for the proceeding	11/30/2020	1.50
Brenda D. Villanueva	R20-10-002	ORG	emails w/ J. Rivera, re: organizing work process and deadlines	12/1/2020	0.50
Brenda D. Villanueva	R20-10-002	PHC	email w/ CPUC Public Advocates Office, re: coordination for prehearing conference	12/2/2020	0.25
Brenda D. Villanueva	R20-10-002	PROC	attend the TURN Intervenor Compensation Workshop w/stakeholders	12/2/2020	2.00
Brenda D. Villanueva	R20-10-002	PHC	attend organizing group meeting, re: prehearing conference details	12/3/2020	1.25
Brenda D. Villanueva	R20-10-002	PHC	coordinate meeting with TURN and CPUC Public Advocates Office, re: prehearing conference	12/3/2020	0.50
Brenda D. Villanueva	R20-10-002	PHC	read prehearing conference instructions	12/3/2020	0.25
Brenda D. Villanueva	R20-10-002	PHC	call w/ TURN and Public Advocates Office, re: plan for pre-hearing conference	12/4/2020	0.50
Brenda D. Villanueva	R20-10-002	PHC	call w/ CM, re: strategy for pre-hearing conference	12/4/2020	0.25
Brenda D. Villanueva	R20-10-002	PHC	email to ALJ Fogel and Comm Div, re: prehearing conference speaker	12/7/2020	0.25
Brenda D. Villanueva	R20-10-002	PHC	call w/ CM, re: prep for prehearing conference	12/8/2020	1.25
Brenda D. Villanueva	R20-10-002	PHC	reviewed materials sent to organizing groups	12/8/2020	0.50
Brenda D. Villanueva	R20-10-002	PHC	emails with R. Stanford (Comm Division CPUC), re: confirm link to participate as a listener at the prehearing conference; shared information with TURN (JR and CP) to resolve confusion	12/9/2020	0.75
Brenda D. Villanueva	R20-10-002	PHC	reviewed and provided feedback to organizing groups letter request public participation hearings in the proceeding	12/9/2020	0.25
Brenda D. Villanueva	R20-10-002	PHC	prep for prehearing conference, reviewed filings submitted and new set of questions released (1); attended prehearing conference (2), submitted next steps to CM (.5)	12/10/2020	3.50
Brenda D. Villanueva	R20-10-002	PHC	email to JR and CSP, re: organizing groups participation in the prehearing conference and in future opportunities	12/10/2020	0.25
Brenda D. Villanueva	R20-10-002	PHC	summarized prehearing conference major points and distributed this to TURN's organizing team and CM	12/11/2020	1.00
Brenda D. Villanueva	R20-10-002	PROC	met with JR, CSP, and CM, re: schedule, organizing group party status and next steps(.5), spoke with CPUC Public Advisors Office (.5), summarized and sent notes of this call to CM (.5)	12/11/2020	1.50
Brenda D. Villanueva	R20-10-002	PROC	exchanged emails and sent updated information and guidance to JR and CSP, re: organizing groups steps to become a party, specifically for the Californians for Jail and Prison Phone Justice Coalition; attached step-by-step directions received from CPUC Public Advisors Office; scheduled meeting with JR later in the week to discuss this information	12/14/2020	1.25

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	PROC	emails w/ S.Green, J.Rivera, and Returning Home Foundation, re: party status motion and status update; separate email with J. Levine CPUC Public Advisor's Office, re: status update	12/15/2020	1.00
Brenda D. Villanueva	R20-10-002	PHC	emails w/ CM, re: follow-up steps after prehearing conference, process questions	12/16/2020	0.50
Brenda D. Villanueva	R20-10-002	PROC	call w/ Jorge, re: outreach group party status guidance and verification of current party status for outreach groups	12/16/2020	0.75
Brenda D. Villanueva	R20-10-002	PROC	emails w/ JR, re: organizing groups party status, update on Worth Rises; separate thread to JR, re: intervenor compensation information and deadline	12/18/2020	1.25
Brenda D. Villanueva	R20-10-002	PROC	sent email to CM, re: Comm Div staff request to meet; read TURN internal exchange, re: intervenor comp details	12/22/2020	0.50
Brenda D. Villanueva	R20-10-002	DR	sent email to Comm Div staff, request to meet first week of January; emailed CM to data requests	12/23/2020	0.25
Brenda D. Villanueva	R20-10-002	CD	followed up with Comm Div (Karo Serle), re: request to meet first week of January	12/30/2020	0.25
Brenda D. Villanueva	R20-10-002	CD	emails w/ Comm Div Staff (KS), re: coordinate call to discuss the proceeding and subject matter expertise	1/5/2021	0.50
Brenda D. Villanueva	R20-10-002	PROC	email w/ CM, JR, CSP, re: reminder for phone justice groups about the intervenor compensation fund and deadlines	1/5/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	reviewed draft data requests for IDCS providers from Comm Div	1/5/2021	0.25
Brenda D. Villanueva	R20-10-002	CD	call w/ CM, re: prep for PUC Staff call, FCC research and strategy and next steps (1.25); high level review of data request draft questions (.25)	1/6/2021	1.50
Brenda D. Villanueva	R20-10-002	COMP	drafted NOI portions	1/6/2021	0.50
Brenda D. Villanueva	R20-10-002	CD	prep (.25) and call w/ CM and Comm Div Staff, re: feedback requested on several key issues and coordination with phone justice groups (1.5)	1/7/2021	1.75
Brenda D. Villanueva	R20-10-002	PROC	emails w/ JR, re: intervenor compensation NOI deadline reminders to groups and staff follow up call with groups	1/7/2021	0.25
Brenda D. Villanueva	R20-10-002	COMP	NOI drafting (.5)	1/7/2021	0.50
Brenda D. Villanueva	R20-10-002	CD	email to CM, re: follow-up approach with Public Advocates after meeting with Comm Division staff (.25);	1/8/2021	0.25
Brenda D. Villanueva	R20-10-002	COMP	draft and address edits to NOI (.5);	1/8/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	organized research questions pending for the case (.25)	1/11/2021	0.25
Brenda D. Villanueva	R20-10-002	COMP	edit and revise NOI	1/11/2021	0.25
Brenda D. Villanueva	R20-10-002	CD	call w/ CM, re: discuss Div Staff call, review of FCC rate making discussions, coordination with Public Advocates Office, drafting talking points for group outreach, scheduling group call with Division Staff (.5);	1/12/2021	0.50
Brenda D. Villanueva	R20-10-002	CD	email to Div Staff (K. Serle; E. Van Wambeke; A. Lau) and CM, re: coordinating a call between Div Staff and phone justice groups (.25)	1/12/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	reviewed portions of Scoping Memo released and emailed CM and RC (.25); email to Public Advocates (K. Tran, K. Donnelly, A. Johnson) and CM, re: request for a meeting to discuss discovery and findings, interim relief and other issues (.25)	1/12/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	call w/ K. Tran (Public Advocates), re: scheduling a call with Public Advocates and TURN, data request process, interim relief approach	1/12/2021	0.50
Brenda D. Villanueva	R20-10-002	CD	emails and call w/ Comm Div Staff (KS), re: coordinate agenda and timeframe for a call with phone justice groups and Division Staff (.5); email and call w/ CM, re: same (1)	1/13/2021	1.50
Brenda D. Villanueva	R20-10-002	CD	email to JR, CSP, and CM, re: group coordination for two meetings with Comm Division staff on juvenile population and on access to legal counsel (.75)	1/13/2021	0.75
Brenda D. Villanueva	R20-10-002	COOR	email to CM, re: debrief notes on call with Public Advocates on 1/12 (.25); email to K. Tran (Public Advocates) and CM, re: scheduling a group call with TURN and Public Advocates (.25)	1/13/2021	0.50
Brenda D. Villanueva	R20-10-002	STAFF	reviewed Scoping Memo	1/13/2021	1.00
Brenda D. Villanueva	R20-10-002	CD	emails w/ and meeting w/ CM, JR, CSP, re: coordination for phone justice groups meetings with Comm Division Staff (1.25); emails w/ CM and CforAT (MK), re: Division Staff meeting with HRDC (PK) and coordination (.25)	1/14/2021	1.50
Brenda D. Villanueva	R20-10-002	CD	call w/ and emails w/ CM and CforAT (MK), re: schedule meeting and strategy (1); email w/ Div Staff (KS), re: collecting redacted phone bills, email w/ CM, re: same (.25)	1/15/2021	1.25
Brenda D. Villanueva	R20-10-002	CD	emails w/ JR and organizing groups, re: coordinate meeting between phone justice groups and Comm Division Staff (.25); email w/ CM and phone justice groups, re: intercompensation fund (.25);	1/15/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	Draft data request (.5)	1/19/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	emails w/ CM, JR, C, MT, re: inmate calling legislative activity involvement (.25); read and shared w/ CM, JR, CSP, re: OC Register article on video visitation issues in California (.25);	1/19/2021	0.50
Brenda D. Villanueva	R20-10-002	CD	emails w/ Comm Divisions Staff (KS), re: organizing two meetings with phone justice groups for discussions about services for juvenile populations and another for state information and access to legal counsel; emails w/ JR, or JR and CM and CSP, re: same and additional coordination of contact information and email addresses for phone justice groups (1.5)	1/20/2021	1.50

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	RES	emails to Public Advocates (JA and KT) and CM, re: scheduling a call between TURN and Public Advocates to discuss discovery and data requests and seek clarification about data requests sent to providers (.25); high level review of Public Advocates GTL data request (.25)	1/20/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	emails to Public Advocates (JA and KT) and CM, re: scheduling a call between TURN and Public Advocates to discuss discovery and data requests and seek clarification about data requests sent to providers (.25); high level review of Public Advocates GTL data request (.25)	1/20/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	emails w/ Public Advocates (JA and KT), and CM, re: Public Advocates data requests and scheduling a follow-up meeting (.5)	1/21/2021	0.50
Brenda D. Villanueva	R20-10-002	CD	emails w/ CSP, JR, CM, re: phone justice group meeting with Comm Division staff - agenda and meeting facilitation; emails with Division staff (KS), re: agenda for phone justice group meetings (.50)	1/21/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	emails w/ CM, re: feedback on draft "me too" data request (.25)	1/21/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	email w/ CforAT (MK) and CM, re: shared disability rights related comments at the FCC, brief review for CPUC proceeding context (.5); review FCC comments in inmate calling proceeding (.5)	1/21/2021	1.00
Brenda D. Villanueva	R20-10-002	CD	prep (.5) for and call w/ Division Staff (KS, EV, AL), TURN (CSP, CM, JR), Children's Defense Fund of California (DN), Media Alliance (TR), Returning Home Foundation (CU), Pacific Juvenile Defender Center (SB), re: juvenile facility calling services, access to services, service quality, rates, other issues (1)	1/22/2021	1.50
Brenda D. Villanueva	R20-10-002	CD	email w/ S. Burrell (Pacific Juvenile Defender Center), Division Staff (KS, EV, AL), and same, re: sharing resources and documents raised in earlier call with Division staff (.25), and reviewed materials sent regarding the Complaint for LA County (.5)	1/22/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	emails w/ Public Advocates Office (JA, KT, CC) and CM, re: scheduling a call with Public Advocates and TURN to discuss data requests and case issues (.25)	1/22/2021	0.25
Brenda D. Villanueva	R20-10-002	CD	emails w/ Division Staff (KS), re: providing connection to Prison Policy Institute; emails w/ JR, re: same	1/22/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	call w/ CM, re: debrief on Division Meeting, discovery strategy and draft data requests, coordination for Public Advocates meeting and Phone Justice Group organizing meeting (.25);	1/22/2021	0.25
Brenda D. Villanueva	R20-10-002	CD	email w/ CM, JR, CSP, re: scheduling legal/organizing call after Division meeting for phone justice group participation (.25); same, re: preparation for organizing meeting with phone justice groups (.25);	1/22/2021	0.50
Brenda D. Villanueva	R20-10-002	CD	emails w/ Division Staff (KS), re: LA county complaint and settlement portions about telephone call access, collect calls, access to attorneys in juvenile halls (.25)	1/25/2021	0.25
Brenda D. Villanueva	R20-10-002	CD	call w/ Division Staff (KS, AL, EV), Worth Rises, Root and Rebound, SF Financial Justice Project, Coalition for Family Unity, and TURN (CM, CSP, JR), re: regulation in other states, access to services, in-person and video visitation, service quality, surveillance issues; and summarize notes (1.25)	1/25/2021	1.25
Brenda D. Villanueva	R20-10-002	RES	email w/ Worth Rises (BT) and JR, re: scheduling a meeting to chat about FCC developments (.25)	1/25/2021	0.25
Brenda D. Villanueva	R20-10-002	ORG	emails w/ CM, JR, CSP, re: scheduling meeting to prep for phone justice organizing meeting; review proposed agenda (.5); emails w/ same, re: larger strategy meeting for phone justice group organizing and next steps (.25);	1/25/2021	0.75
Brenda D. Villanueva	R20-10-002	RES	email w/ CM, Securus 2021 annual tariff filing (.25)	1/26/2021	0.25
Brenda D. Villanueva	R20-10-002	ORG	Call w/ CM, JR, CSP, re: stakeholder group meeting delegating tasks, debrief on Division meeting logistics and discussion, FCC proceeding, send FCC page for these services to group (.5); call w/ CM, re: drafting talking points for stakeholder group meeting (.25)	1/27/2021	0.75
Brenda D. Villanueva	R20-10-002	ORG	draft talking points for stakeholder group meeting on interim relief substantive issues and procedural issues, draft sent to CM (.5)	1/27/2021	0.50
Brenda D. Villanueva	R20-10-002	ORG	emails to CSP and CM, JR, re: reaching out to Worth Rises for understanding of FCC work on changes to the current structure (.25); emails to JR, CSP, CM, re: seeking feedback on legislative proposals about incarcerated/detained calling services (.25)	1/27/2021	0.50
Brenda D. Villanueva	R20-10-002	COOR	stakeholder meeting w/ TURN (CM, JR, CSP), and Phone Justice Groups (Worth Rises, Children's Defense Fund, Root and Rebound, Media Alliance, and others), re: Division staff meeting debrief, providing subject matter expertise to staff, messaging and relaying anecdotes, interim relief phase and process, state legislation updates (1.5), email w/ CM, re: feedback on interim relief talking points for group meeting (.25);	1/28/2021	1.75
Brenda D. Villanueva	R20-10-002	DR	emails w/ Prison Policy Institute (SR, Af), CM, schedule meeting to discuss discovery (.25)	1/28/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	call w/ Public Advocates Office (JA, KT, PH, CC, KD), re: data requests, models from other states, work with Division staff, public participation hearing and system-impacted individuals' participation (1); email to same, re: rescheduling time (.25)	1/28/2021	1.25
Brenda D. Villanueva	R20-10-002	PPH	email with Division Staff (KS), and email w/ CSP, JR, CM, MT, re: public participation hearings, number of, dates, other coordination logistics (.5)	1/28/2021	0.50



**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	DR	call with Prison Policy Institute (SR, AF), and CM, re: PUC practice and data request questions (.5); emails w/ CM, and Prison Policy Institute (SR, AF), re: data requests examples and other material (.25)	1/29/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	emails w/ CM, re: data request language and proposed plan (.25); prepare and send data requests to GTL, Securus, NCIS, ICSolutions (1)	1/29/2021	1.25
Brenda D. Villanueva	R20-10-002	PPH	email with Division Staff (KS), and CSP, JR, CM, re: call to discuss public participation hearings logistics (.25)	1/30/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	call w/ Worth Rises (BT), JR, re: FCC proceeding, rate cap approach, ancillary fees, data source issues (.5); call w/ JR, re: approach for TURN in the CPUC in light of FCC proceeding, debrief call (.25);	2/1/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	emails w/ CM and Prison Policy Institute (SR, AF), re: me too data requests, POA data requests, seek information about ancillary fees in CA (.25); email w/ JR, CM, CSP, re: data sources shared by the SB 555 campaign team from San Francisco (.25);	2/1/2021	0.50
Brenda D. Villanueva	R20-10-002	PPH	emails w/ Division Staff (KS), CM, JR, CSP, and separate emails w/ CM, JR, CSP, re: scheduling a call to discuss PPH logistics, set up, number of, etc. (.5)	2/1/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	emails w/ Prison Policy Insitutte (SR, AF), and CM, re: ancillary fee variation charged by California service providers, findings for GTL (.25); emails w/ CSP, CM, JR, re: Worth Rises curriculum program (.25)	2/2/2021	0.50
Brenda D. Villanueva	R20-10-002	PPH	call w/ Division Staff (K. Serle, A. Lau), CSP, JR, re: public participation hearings, accomodations needed for individuals worried about retribution for speaking out, the possibility of having incarcerated/detained participation, timing and the amount of PPHs, provider participation (.75)	2/3/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	email w/ GTL (M. Conaty and C. Kiser), email w/ C. Mailloux, re: GTL responde to TURN Data Request 001, high brief review of response (.5)	2/4/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	emails w/ D. Sashkin, re: coordinating schedules to discuss FCC ancillary fees and intrastate calls (.25)	2/4/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	email w/ Division Staff (K. Serle), CSP, JR, CM, re: facilitating the participation of incarcerated/detained individuals to join the live public participation hearing (.25); emails w/ CSP, JR, CM, re: how to faciliate the logistics for participation of individuals detained (.5)	2/4/2021	0.75
Brenda D. Villanueva	R20-10-002	#	call w/ S. Munkelt (California Attorneys for Criminal Justice), re: issues with holding confidential phone calls with clients, rate structure and surcharges, public participation hearings, recent Dept. of Corrections cap on 30-minutes to speak with client for a single case (.5)	2/5/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	call with Worth Rises to discuss FCC proceeding, specifically rates and ancillary fees(.5)	2/5/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	call w/ S. Munkelt (California Association of Criminal Defense Attorneys), re: criminal defense attorney perception of issues with these services, mostly confidentiality setting concerns (.75)	2/5/2021	0.75
Brenda D. Villanueva	R20-10-002	PPH	emails w/ JR, re: seeking information from phone justice groups related to accomodations needed for public participation hearings; emails w/ Division Staff (K. Serle), JR, CSP, CM, re: responding to questions for public participation hearing accomodations (.25)	2/5/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	email w/ CM, CSP, JR, re: engagements with Division staff related to public participation hearings and accomodations needed for incarcerated/detained inviduals	2/5/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	email w/ S. Young (SF Financial Justice Project), re: February webinar on High cost of Jail Calls and Commissary Markups (.25)	2/9/2021	0.25
Brenda D. Villanueva	R20-10-002	PHC	emails w/ CM, re: transcript from Dec. 10, 2020 prehearing conference (.25); brief review of the transcript for questions asked (.25)	2/9/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	email w/ CSP, meeting with Public Advisors to discuss public participation hearings logistics for the proceeding	2/9/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	emails w/ CSP, and email w/ Public Advisor Office (J. Levine) and CSP, re: public participation hearings for the proceeding - logistics, considering fear of impacted families of facing retaliation, and request for meeting (.5)	2/10/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	prepare nondisclosure agreement between TURN and NCIC and email to CM for review (.5); email to AS, re: word version of another nondisclosure agreement (.25)	2/11/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	prepare nondisclosure agreement between TURN and ICSolutions; and another with NCIC (.5) and email w/ S. Warren, consultant for NCIC and for Icsolutions, and CM, re: draft nondisclosure agreement (.25)	2/12/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	email with Public Advocates and CM, re: follow-up on discovery request from GTL (.25)	2/12/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	email w/ D. Reinhold (Securus), re: follow-up to TURN data request 01, no response received since 01-29-01 (.25);	2/12/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	emails w/ Public Advocates (J. Ahlstedt, C. Choe, K. Tran), and CM, re: GTL response to Public Advocates data request, and production (.25); emails w/ CM, re: seeking guidance in response to GTL objections for the "me too" request from TURN (.5)	2/16/2021	0.75

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	PPH	call w/ CM, re: public participation hearings logistics strategies to facilitate participation of incarcerated and detained individuals (.5)	2/16/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	emails w/ JR, CSP, CM, re: review survey results from the Financial Justice Project San Francisco about jails and phones (.25)	2/18/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	email to CM, re: questions about nondisclosure agreement signatures; email to S. Warren, M. Pennywell from ICSolutions, and CM, re: nondisclosure agreement follow up (.25)	2/18/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	email w/ CM, re: CM call with Division Staff (EW), re: public participation hearings and logistics and incarcerated/detained participation sensitivities and needs (.25)	2/18/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	review revised nondisclosure agreement from ICSolutions and NCIC (.5); email w/ S. Warren, NCIC Consultant, NCIC (S. Jackson, M. Pennywell), and CM, re: signed nondisclosure agreement (.25); email w/ CM, re: approving ICSolutions nondisclosure agreement for signature (.25)	2/19/2021	1.00
Brenda D. Villanueva	R20-10-002	DR	email w/ GTL (M. Conaty and C. Kiser), and CM, re: call to discuss GTL Statement of Objections to the TURN nondisclosure agreement (.25); review GTL statement of objections to TURN data response (.25)	2/19/2021	0.50
Brenda D. Villanueva	R20-10-002	CD	email w/ JR, CSP, CM, re: Comm. Division questions pending regarding incarcerated persons' ombudsman and CM's conversation with staff (.25)	2/22/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	attended Aspen Institute and San Francisco Justice Project on jail calls and commissary mark ups (.5, left event early); email to Aspen Institute (D. Body) and San Francisco Justice Project (A. Stuhldreher), JR, re: introduction and exchanging information, emails w/ CSP, CM, JR, re: attending same event (.25);	2/23/2021	0.75
Brenda D. Villanueva	R20-10-002	RES	emails w/ JR, CM, CSP, and email w/ Returning Home Foundation (C. Urie), re: reported development about Iowa's changes to incarcerated phone service charges at Iowa jails (.5)	2/23/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	email w/ GTL (M. Conaty and C. Kiser), and CM, re: call to discuss GTL Statement of Objections to the TURN nondisclosure agreement (.25)	2/23/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	emails w/ Securus (M. Lozich, J. Martin), CM, re: TURN data request to Securus follow up from January 29th; original recipient no longer with the company (.5)	2/23/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	emails w/ CM, re: nondisclosure agreement appendix for ICSolutions (.25); sign and format complete nondisclosure package, email to ICSolutions (S. Warren, M. Pennywell, K. Dawson), CM, re: signed nondisclosure agreement between TURN and ICSolutions (.25)	2/23/2021	0.50
Brenda D. Villanueva	R20-10-002	PPH	email w/ Public Advisors Office (J. Levine), re: input for logistics for public participation hearings; emails w/ CM, JR, CSP, re: same (.5);	2/23/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	email w/ Aspen (D. Body) and SF Financial Justice Project and Aspen Institute Financial Security Program (A. Stuhldreher), JR, re: coordinating time to meet (.25); email w/ Aspen (D. Body), w/ CM, JR, CSP, re: survey and other materials from webinar on jail phone services (.25)	2/24/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	reviewed GTL nondisclosure agreement, email to CM, re: same (.25)	2/24/2021	0.25
Brenda D. Villanueva	R20-10-002	COOR	email w/ Financial Justice Project (A. Stuhldreher and M. Lau), w/ JR, CSP, CM, re: coordinating a group call with A. Stuhldreher and TURN (.25)	2/25/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	emails w/ GTL (M. Conaty and C. Kiser), CM, re: coordinating time to discuss nondisclosure agreement (.25) call w/ CM, and GTL (C. Kiser) re: nondisclosure agreement drafted by GTL, FCC protective order and process, PUC process (.5); draft proposed TURN-GTL nondisclosure agreement, email w/ CM, re: same (.75)	2/25/2021	1.50
Brenda D. Villanueva	R20-10-002	DR	call w/ CM, re: nondisclosure agreements for GTL and debrief the call with GTL (.5)	2/25/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	draft nondisclosure agreement between TURN and Securus, email w/ Securus (M. Lozich, J. Martin), CM, re: same (.75)	2/25/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	revise TURN-GTL nondisclosure agreement based on GTL proposed draft and discussion with GTL (.75); email w/ GTL (C. Kiser, M. Conaty), CM, re: same (.25)	2/26/2021	1.00
Brenda D. Villanueva	R20-10-002	DR	review Securus draft for the TURN-Securus nondisclosure agreement, email w/ CM, re: same (.25)	2/26/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	emails w/ JR, CSP, CM, re: ALJ ruling for public participation hearings and logistics to facilitate participation of incarcerated and detained individuals (.25); emails w/ CSP, re: carrier notification for customers (.25)	2/26/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	read State CDCR Secretary Kathleen Allison news release, new negotiated rates with GTL (.25); email w/ CSP, MS, CM, JR, re: news article; email w/ Communications Division (K. Serle), re: same (.25)	3/2/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	email w/ CM, CSP, JR, and read article on San Diego County decision to end practice of charging for jail phone services; email w/ Communications Division (K. Serle), re: same (.25)	3/3/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	review GTL revised nondisclosure agreement (.25)	3/3/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	review and email CM, re: FCC inmate calling services mandatory data collection material (.25)	3/3/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	call w/ CM, re: discovery strategy and nondisclosure drafts	3/4/2021	0.25
Brenda D. Villanueva	R20-10-002	COOR	attend Phone Justice Group video meeting, re: public participation hearings, recent state and San Diego County news, strategy	3/4/2021	1.50

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	RES	email w/ CSP, CM, JR, RC, re: San Diego County decision and funding questions (.25)	3/5/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	review GTL revised GTL-TURN nondisclosure agreement and email w/ CM, re: same (1.75)	3/8/2021	1.75
Brenda D. Villanueva	R20-10-002	RES	emails w/ CSP, RC, AS, JR, CM, re: free or low cost phone calls (.25)	3/9/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	call w/ CM, re: GTL nondisclosure draft and FCC proceeding (.75); email to CM, re: response to GTL (.25)	3/9/2021	1.00
Brenda D. Villanueva	R20-10-002	DR	email w/ ICSolutions and ICSolutions consultant, CM, re: data requests responses receipt (.25)	3/9/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	emails w/ CM, re: GTL nondisclosure agreement concerns; email to GTL (M. Conaty, C. Kiser); re: same (.25)	3/10/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	review Securus TURN nondisclosure agreement, and emails w/ CM, re: same (1.5)	3/10/2021	1.50
Brenda D. Villanueva	R20-10-002	PPH	emails w/ Comm. Division, JR, CSP, re: public participation hearing logistics schedule call (.25); review request to Division staff (.25)	3/10/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	review CM feedback on Securus TURN nondisclosure agreement (.5)	3/11/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	review FCC Incarcerated Calling Services docket protective order, email to CM, re: same (.5); review GTL nondisclosure agreement and TURN nondisclosure agreement drafts (.25); call w/ GTL (M. Conaty) and CM, re: same (.5); call w/ CM, re: GTL nondisclosure next steps and FCC Protective Order (.5)	3/11/2021	1.50
Brenda D. Villanueva	R20-10-002	DR	revise Securus TURN nondisclosure draft; email to CM, re: same, and next steps with Securus (1.75)	3/11/2021	1.75
Brenda D. Villanueva	R20-10-002	DR	email to CM, to Securus, re: Securus-TURN nondisclosure agreement (.25)	3/12/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	emails w/ Prison Policy Institute (SR), re: data responses and discovery motions (.25); review sample motions to compel (.25)	3/12/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	call w/ Public Advocates (C. Chen), re: discovery and GTL, email to CM, re: same (.5)	3/12/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	read FCC Incarcerated calling service docket FCC and EB recent decisions and email to CM, re: intrastate ancillary service charges (.75)	3/12/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	email w/ GTL (M. Conaty, C. Kiser), CM, re: GTL-TURN nondisclosure agreement and FCC Protective Order (.25); review GTL analysis and email to CM, re: same (.25)	3/15/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	review AB 990 prison inmate visitation legislation, email to CM, CSP, JR, re: analysis of AB 990 and impact to CPUC proceeding (.5)	3/15/2021	0.50
Brenda D. Villanueva	R20-10-002	PPH	call with Division Staff (K. Serle, A. Lau), JR, CSP, re: public participation hearing participation of incarcerated/detained and logistics; (.5)	3/15/2021	0.50
Brenda D. Villanueva	R20-10-002	PPH	call w/ CSP and JR, re: logistics for public participation hearing testimony and written submissions (.5); email w/ CM, CSP, JR, re: same; email w/ Division Staff (K. Serle, A. Lau), CSP, CM, re: written testimony submission deadline (.25)	3/15/2021	0.75
Brenda D. Villanueva	R20-10-002	RES	review Penal Code and AB 990, and send notes to CM, JR, CSP, MT, RC, AS, and I. Hernandez, re: free phone calls in state correctional facilities (.75)	3/16/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	read Prison Policy Institute Motion to Compel GTL to respond to data requests (.75); email to CM, to CSP, JR, re: same; emails w/ PPI (SR), re: same (.25)	3/18/2021	1.00
Brenda D. Villanueva	R20-10-002	DR	read Prison Policy Institute Motion to Compel, Exhibit	3/19/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	call w/ CM, AS, re: nondisclosure agreements and PPI motion to compel data responses	3/19/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	email Securus, CM, re: Securus-GTL nondisclosure agreement; email to CM, re: GTL-TURN nondisclosure agreement, and review PPI Motion to Compel	3/22/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	read Worth Rises, Free Press, and other March 19, 2021 FCC ex parte, email to CM, JR, CSP	3/22/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	review FCC ex partes, re: ancillary fees, commissions, correctional size neutral rates, email w/ CM, JR, CSP, re: same	3/22/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	email w/ CM, w/ GTL (MC, CK), re: GTL-TURN nondisclosure agreement next steps and TURN 001 data request	3/22/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	emails w/ Comm. Division, JR, CM, re: public participation hearings logistics and follow up (.25)	3/22/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	email w/ GTL (M. Conaty, C. Kiser), CM, re: GTL redacted data responses to TURN Data request 001	3/23/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	read ALJ ruling for public participation hearings for instructions, email to CM, CSP, JR, MT, re: summary of same	3/23/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	GTL data request access to responses and review; email findings to CM, re: same	3/24/2021	1.00
Brenda D. Villanueva	R20-10-002	DR	call w/ CM, re: discovery production and strategy, nondisclosure agreements follow-up; email w/ CM, re: same (.5);	3/25/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	review Public Advocates Office data request to GTL (.25)	3/25/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	email w/ JR, CSP, CM, MT, re: ALJ ruling summary for external partners to answer questions about logistics	3/25/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	vmail to Securus (M. Lozich), re: Securus-TURN nondisclosure agreement; email w/ CM, re: same	3/26/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	review ICSolutions discovery; email to Inteserra (MP, SW), CM, re: follow up on TURN data request for NCIC	3/26/2021	2.75
Brenda D. Villanueva	R20-10-002	DR	call w/ Inteserra (MP), re: nondisclosure agreements and data request responses for NCIC and ICSolutions; email w/ CM, re: same	3/29/2021	0.75

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	DR	read GTL Response to PPI Motion to Compel, email to CM, re: summary of same	3/29/2021	0.75
Brenda D. Villanueva	R20-10-002	RES	read testimony from international account of using payment services, email to CSP, JR, CM, re: impressions and strategy	3/29/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	emails w/ M. Pennywell and S. Warren (Inteserra), re: NCIC and Icsolutions data request response and document production; review Icsolutions document production	3/30/2021	2.00
Brenda D. Villanueva	R20-10-002	RES	emails w/ CSP, re: international commenter experience with rates and fees	3/31/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	read ALJ Interim Staff Proposal; email w/ CM, re: same	4/2/2021	0.75
Brenda D. Villanueva	R20-10-002	STAFF	email w/ JR, CSP, CM, re: sharing ALJ staff proposal with phone justice groups and strategy	4/5/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, re: division of labor and summary of ALJ ruling; emails w/ JR, CSP, CM, re: same and timing; email w/ JR, and phone justice group, re: series of next training and the PPHs	4/6/2021	0.25
Brenda D. Villanueva	R20-10-002	#	call w/ Cal Advocates (KT), re: discovery, public participation hearings, strategy and next steps, legislation related to phones; email w/ Cal Advocates (KT), re: legislation update on AB 990	4/7/2021	0.50
Brenda D. Villanueva	R20-10-002	#	email w/ CM, re: update on PPHs, ALJ interim relief, NDAs, discovery, legislation	4/7/2021	0.25
Brenda D. Villanueva	R20-10-002	COOR	emails w/ JR, Worth Rises (BT), phone justice groups, re: public participation hearing logistics (confidentiality), interim relief staff proposal feedback	4/7/2021	0.50
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, re: interim relief staff proposal next steps, phone justice group work	4/13/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	email w/ Securus consultant (J.Clark), re: follow up to NDA draft with Securus	4/13/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	read ALJ ruling providing for comment Staff Interim Rate Relief Proposal; provide analysis for TURN, email w/ CM, re: same	4/13/2021	1.00
Brenda D. Villanueva	R20-10-002	PPH	emails w/ CM, CSP, JR, re: Securus procedural question to ALJ for public participation hearings and facilitating logistics for participation	4/13/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	write summary of ALJ ruling Staff Proposal, email w/ CSP, JR, CM, re: same	4/15/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	(Staff Proposal) attend meeting w/ TURN and incarcerated/detained phone justice groups, re: interim relief comments, next steps	4/15/2021	0.75
Brenda D. Villanueva	R20-10-002	RES	review Arkansas state law passed, capping rates and fees; email to CM, CSP, JR, MT, re: same	4/15/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	draft strategy for ALJ Ruling on Staff Proposal Opening Comments; email to CM, re: same	4/18/2021	1.25
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, re: interim relief staff proposal comments and strategy (.75), email w/ CSP, JR, CM, re: scheduling time to meet (.25)	4/21/2021	0.75
Brenda D. Villanueva	R20-10-002	#	email w/ CM, JR, CSP, re: party presentations at PPH, Securus NDA	4/21/2021	0.25
Brenda D. Villanueva	R20-10-002	PPH	read CPU C letter to carriers, re: calling access during public participation hearings; email w/ JR, CM, re: same	4/21/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	email w/ Cal Advocates (KT), re: strategy meeting coordination	4/22/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	call w/ Cal Advocates (KT, CC, JA, PH, BX), CM, re: interim relief comment strategy and PPHs	4/22/2021	1.00
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, re: debrief call w/ Cal Advocates, interim relief comment strategy	4/22/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	draft opening comments on staff proposal	4/22/2021	1.50
Brenda D. Villanueva	R20-10-002	RES	research New Jersey prison phone rate law, S.1880	4/23/2021	1.00
Brenda D. Villanueva	R20-10-002	RES	call w/ M.Nava-Ruiz, New Jersey advocate, re: New Jersey prison phone rate law; email w/ CM, re: call debrief and New Jersey model discussion	4/23/2021	0.75
Brenda D. Villanueva	R20-10-002	STAFF	draft opening comments on staff proposal	4/23/2021	3.00
Brenda D. Villanueva	R20-10-002	STAFF	call w/ Prison Policy Institute (SR), re: strategy for opening comments on staff proposal, discovery; review PPI comment and reply to OIR	4/23/2021	1.25
Brenda D. Villanueva	R20-10-002	DR	review signed Securus NDA, revise TURN data request to Securus, email w/ Securus (M. Lozich; J. Clark), CM, re: same	4/23/2021	0.75
Brenda D. Villanueva	R20-10-002	DR	emails w/ Cal Advocates, re: Cal Advocates data requests to service providers; call w/ Cal Advocates (C. Choe), re: same	4/23/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	call w/ M. Pennywell (Inteserra), re: confidential markings; email w/ M. Pennywell, re: same	4/23/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	email w/ S. Raher (PPI), re: state survey on prison/jail phone rates; review PPI material; review Worth Rises state survey	4/23/2021	0.50
Brenda D. Villanueva	R20-10-002	STAFF	emails w/ CM, re: draft opening comments feedback; emails w/ CforAT (MK, PG), CM, re: strategy for opening comments	4/26/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	emails w/ JR, CM, CSP, group feedback on staff proposal from Worth Rises and Returning Home Foundation	4/26/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, CSP, JR, re: interim rate staff proposal strategy, group discussion	4/26/2021	1.00
Brenda D. Villanueva	R20-10-002	RES	FCC research on rate methodology and confidential data	4/26/2021	1.25
Brenda D. Villanueva	R20-10-002	RES	review prison recidivism and phone access literature to prepare TURN Staff Proposal comments	4/27/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	emails w/ JR, CM, CSP, phone justice groups, re: copies of contracts in California (.25); email w/ SF Financial Justice Project, re: introduction to state coordinators for phone justice campaign	4/27/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	read ALJ ruling on PPI motion to compel discovery, email w/ CM, CSP, RC, AS, re: ruling analysis	4/27/2021	0.50

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	RES	read GTL-CDCR 2021 contract; Orange County -GTL contract	4/27/2021	1.00
Brenda D. Villanueva	R20-10-002	STAFF	draft opening comments on staff proposal	4/27/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	emails w/ Worth Rises (BT), and SF Public Defender's Office (DR); re: ICS provider contracts in California and FOIA requests	4/28/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	draft opening comments on staff proposal	4/28/2021	3.00
Brenda D. Villanueva	R20-10-002	RES	call w/ Worth Rises (BT), re: ICS provider contracts in California; email w/ CM, re: debrief	4/28/2021	0.50
Brenda D. Villanueva	R20-10-002	STAFF	draft opening comments on staff proposal, review FCC May 2021 decision forthcoming; email with Comm Divison staff (KS, AL), re: same; email w/ PPI (SR), re: same	4/29/2021	9.50
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, re: opening comments strategy	4/29/2021	1.00
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, re: interim relief staff proposal comments and strategy (.75);	4/30/2021	0.75
Brenda D. Villanueva	R20-10-002	STAFF	draft opening comments on staff proposal	4/30/2021	6.50
Brenda D. Villanueva	R20-10-002	STAFF	prep for reply comments, and email to CforAT and CM, re: same	5/6/2021	2.00
Brenda D. Villanueva	R20-10-002	STAFF	review GTL FCC ex parte April 2021	5/7/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	read opening comments in preparation for reply comment	5/7/2021	2.00
Brenda D. Villanueva	R20-10-002	STAFF	prepare outline for TURN Staff Proposal reply comments	5/10/2021	2.50
Brenda D. Villanueva	R20-10-002	RES	research state CDCR contract with GTL	5/10/2021	1.00
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, re: reply draft strategy and next steps for TURN Staff Proposal reply comments	5/10/2021	1.25
Brenda D. Villanueva	R20-10-002	RES	call w/ M. Lau, re: state and county RFP process; state legislation	5/10/2021	0.50
Brenda D. Villanueva	R20-10-002	STAFF	review opening comments to staff proposal to prepare TURN Staff Proposal reply comments	5/10/2021	1.00
Brenda D. Villanueva	R20-10-002	STAFF	draft TURN Staff Proposal reply comments	5/10/2021	3.00
Brenda D. Villanueva	R20-10-002	#	review and emails w/ CM, re: ALJ Ruling re: information only service list	5/10/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	emails w/ intervenors re: ex parte meeting with Guzman Aceves office	5/10/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	draft TURN Staff Proposal reply comments	5/11/2021	6.25
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, re: reply comments to staff proposal	5/11/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	call w/ Returning Home Foundation (CU), CM, JR, re: reply comments and Guzman Aceves ex parte	5/11/2021	0.75
Brenda D. Villanueva	R20-10-002	STAFF	draft TURN Staff Proposal reply comments	5/12/2021	3.50
Brenda D. Villanueva	R20-10-002	STAFF	call w/ Cmr. Guzman Aceves (JK), and TURN, CforAT, Cal Advocates, Returning Home Foundation, SF Financial Justice Project, re: reply comments (.5); call w/ CM, re: debrief meeting with CGA Office and intervenors, discuss next steps for reply comments (.5); email to CSP, JR, CM, MT, re debrief notes, re: same (.25); emails w/ meeting attendees, re: Cal Advocates ex parte draft (.25)	5/12/2021	1.50
Brenda D. Villanueva	R20-10-002	STAFF	draft reply comment to staff proposal (5); emails w/ CM, re: feedback to updates and next steps (.5)	5/12/2021	5.50
Brenda D. Villanueva	R20-10-002	RES	email w/ CforAT (PG), re: FCC forthcoming draft report and order	5/12/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, re: reply draft feedback and next steps	5/12/2021	0.50
Brenda D. Villanueva	R20-10-002	STAFF	review reply comments filed to Staff Proposal	5/13/2021	1.00
Brenda D. Villanueva	R20-10-002	ORG	call w/ JR, re: next stakeholder meeting; email w/ JR, CSP, CM, re: next stakeholder meeting schedule	5/13/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	review FCC ex partes from United Church of Christ; Wright Brothers	5/17/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	review Los Angeles Board of Supervisors draft motion initiating steps towards free phone calls for jails and juvenile facilities; email to JR, CSP, CM, re: same	5/18/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	emails w/ consumer groups, re: Los Angeles Board of Supervisor motion to call for free phone calls at jails	5/19/2021	0.25
Brenda D. Villanueva	R20-10-002	STAFF	call w/ CM, CSP, JR, re: opening and reply comments discussion, schedule, FCC draft decision (.75)	5/19/2021	0.75
Brenda D. Villanueva	R20-10-002	ORG	call w/ CM, CSP, JR, re: next steps for organizing (.25)	5/19/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	attended FCC Open Commission Meeting, re: incarcerated calling services decision vote and presentation; email w/ CM, CSP, JR, re: same; sent follow-up email with notes	5/20/2021	0.75
Brenda D. Villanueva	R20-10-002	RES	review FCC docket, ICS provide redacted forms	5/21/2021	0.50
Brenda D. Villanueva	R20-10-002	RES	reviewed FCC released decision; email to CM, CSP, JR, re: analysis of the state effect; email to CPUC Comm Division (KS, AL), re: same; email to Prison Policy Initiative (SR), re: same	5/24/2021	0.75
Brenda D. Villanueva	R20-10-002	ORG	emails w/ CSP, JR, CM, re: stakeholder group agenda and updates	6/17/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	email from JR, re: Connecticut law - free state prison phone calls	6/17/2021	0.25
Brenda D. Villanueva	R20-10-002	RES	call w/ Prison Policy Institute (A. Fenster), re: PUC call w/ PPI about data and other states; statutes in other states, authority for states, video calling, data requests, FCC rulemaking, PUC actions for permanent rates	7/6/2021	2.00
Brenda D. Villanueva	R20-10-002	RES	email w/ PPI, re: information about contract bundles with video, (.25)review information received (1)	7/8/2021	1.25
Brenda D. Villanueva	R20-10-002	PD	read ALJ Proposed Decision for interim relief	7/13/2021	2.00
Brenda D. Villanueva	R20-10-002	PD	email w/ CM, JR, CSP, re: review and feedback of the Proposed Decision	7/14/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	email w/ CM, JR, CSP, re: questions about responding to proposed decision	7/15/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	emails w/ CS, JR, re: scheduling team meeting to discuss proposed decision and strategy for voting meeting	7/19/2021	0.25

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	DR	review FCC dockets, read CPUC forms, and emails w/ CM, CSP, JR, re: CPUC acknowledgement of confidentiality forms submitted to FCC	7/19/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	call w/ CM, CSP, re: proposed decision strategy for opening comments (.25); outreach and stakeholder coordination (.25)	7/22/2021	0.50
Brenda D. Villanueva	R20-10-002	#	call w/ CSP, re: confidentiality issues at FCC and CPUC; budget changes for CDCR and impact to proceeding (.75); coordination with stakeholder groups (.25)	7/22/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	review proposed decision to prep for strategy meeting	7/22/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	call w/ JR, re: proposed decision, strategy for stakeholders, budget language, FCC confidentiality rules	7/23/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	call w/ outreach stakeholders regarding proposals in PD	7/27/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	call w/ AS, re: proposed decision, rates, budget language	7/27/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	emails w/ JR, CM, CSP, and AS, re: coordinate time for racial equity discussion and send background notes and material	7/27/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	emails w/ JR, CM, CSP, re: state budget clarifications and implications for PUC proceeding work	7/28/2021	0.25
Brenda D. Villanueva	R20-10-002	EQU	call w/ CM, GS, JR, AS, re: proposed decision comments and racial equity discussion (.75); email w/ MT, CSP, CM, GS, JR, AS, re: racial bias letter reference (.25)	7/28/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	read proposed decision and draft outline for comments	7/28/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	call w/ CM, re: proposed decision comment strategy and next steps	7/29/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	draft propose decision opening comments	7/29/2021	2.00
Brenda D. Villanueva	R20-10-002	EQU	emails w/ GS, MT, CSP, CM, re: diversity commitments and inclusions in proposed decision opening comments	7/30/2021	0.25
Brenda D. Villanueva	R20-10-002	COOR	email w/ JR, CM GS, RC, re: NCIC comments discussion (.25)	7/30/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	draft opening comments to proposed decision	7/30/2021	6.00
Brenda D. Villanueva	R20-10-002	PD	emails w/ CM, re: feedback provided to proposed decision opening comments and revise draft	7/31/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	prepare opening comments draft for proposed decision	7/31/2021	3.00
Brenda D. Villanueva	R20-10-002	EQU	emails w/ GS, re: equity consideration section and exchange draft	7/31/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	draft Proposed Decisions Opening Comments	8/1/2021	3.00
Brenda D. Villanueva	R20-10-002	PD	call w/ CM, re: proposed decision review and revisions	8/2/2021	0.75
Brenda D. Villanueva	R20-10-002	PD	draft Proposed Decisions Opening Comments; call w/ CM, re: same (.75)	8/2/2021	5.75
Brenda D. Villanueva	R20-10-002	PD	read IPCS providers' proposed decision opening comments	8/2/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	call w/ CM, re: proposed decision reply comments strategy and drafting proposals	8/3/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	review proposed decision opening comments	8/3/2021	1.50
Brenda D. Villanueva	R20-10-002	PD	write TURN reply comments to proposed decision	8/3/2021	4.00
Brenda D. Villanueva	R20-10-002	PD	emails with TURN stakeholder members, PD comments and reply; email w/ CM, CSP, JR, re:same	8/5/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	email w/ CM, re:feedback on reply comment on PD	8/5/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	write TURN PD reply comments and review PD opening comments from ICS providers	8/5/2021	4.75
Brenda D. Villanueva	R20-10-002	PD	email w/ Returning Home Foundation (C. Urie), re: proposed decision opening comments	8/5/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	read industry comments to proposed decision	8/5/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	write TURN PD reply comments	8/6/2021	2.00
Brenda D. Villanueva	R20-10-002	PD	review ex parte notices, email w/ CM, JR, CSP, re: strategy for TURN and ex partes	8/6/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	write TURN PD reply comments	8/7/2021	4.00
Brenda D. Villanueva	R20-10-002	PD	write TURN PD reply comments	8/8/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	calls and messages w/ CM, re: proposed decision reply comments (.25); and re: strategy for ex parte meetings with PUC offices (.25)	8/9/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	revise reply comments to proposed decision	8/9/2021	2.25
Brenda D. Villanueva	R20-10-002	PD	preapre ex parte meeting requets with PUC offices	8/9/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	review reply comments to proposed decision from parties	8/9/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	organize ex partes held or planned and strategize plan for TURN	8/9/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	calls w/ Rechtschaffen Office and Batjer office, re: ex parte meetings requests (.5); emails w/ CM, CSP, JR, SG re: same (.25); draft and revise ex parte notices (.5)	8/10/2021	1.25
Brenda D. Villanueva	R20-10-002	PD	review ex partes filings	8/10/2021	0.50
Brenda D. Villanueva	R20-10-002	COOR	call w/ Cal Advocates (KT) CM, re: meeting with Cal Advocates to discuss ex parte strategy (.25); emails w/ CM, re: meetings strategy for Cal Advocates meeting and ex parte (.25)	8/10/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	organize ex parte notices and schedule (.5); email w/ CM, JR, CSP, re: emails with ex parte summary (.25)	8/12/2021	0.75
Brenda D. Villanueva	R20-10-002	PD	read Securus post meeting ex parte notices and email notes to JR, CSP	8/12/2021	0.50
Brenda D. Villanueva	R20-10-002	COOR	call w/ Cal Advocates (AMJ, KT, JA), TURN (CM, JR), re: ex parte strategy (.5); emails w/ CM, JR, CSP, re: debrief notes and next steps (.25)	8/12/2021	0.75
Brenda D. Villanueva	R20-10-002	PD	draft presentation points for ex partes	8/12/2021	0.75
Brenda D. Villanueva	R20-10-002	PD	review Proposed Decision, TURN opening and reply comments, and FCC 2021 order in preparation for CPUC ex parte meetings	8/13/2021	0.75
Brenda D. Villanueva	R20-10-002	PD	(Rechtschaffen ex parte) call w/ CM, re: prep for Rechtschaffen Office ex parte (.25); ex parte call w/ Rechtschaffen Office (JPG), CM, JR, re: support for the Proposed Decision and stakeholder work discussion (.5)	8/13/2021	0.75
Brenda D. Villanueva	R20-10-002	PD	draft post-meeting ex parte notice for Rechtschaffen Office ex parte	8/13/2021	0.75

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	RES	review FCC docket and Order extending deadlines for FNPRM comments(.25); email w/ CM, JR, CSP, re: same and notes for CPUC proceeding (.25)	8/13/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	emails w/ JR, CM, CSP, re: ex parte debrief from Public Advocates, and Rechtschaffen Office meeting	8/13/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	(Batjer ex parte) prep for ex parte meeting (.25); ex parte call w/ Batjer Office (MM), CM, JR, re: proposed decision and stakeholder work discussion (.5); call w/ CM re: debrief and ex parte post-meeting notice (.25)	8/13/2021	1.00
Brenda D. Villanueva	R20-10-002	PD	draft ex parte post-meeting notice for call w/ Batjer office and email w/ CM, CSP, JR, re: same (.5)	8/13/2021	0.50
Brenda D. Villanueva	R20-10-002	DR	read Cal Advocates motion to compel GTL; and email w/ CM, re: same	8/13/2021	0.75
Brenda D. Villanueva	R20-10-002	PD	review feedback to Batjer office ex parte and Rechtschaffen office ex parte	8/16/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	call w/ CM, re: ex parte post-meeting notices, and preparation for CPUC voting meeting on proposed decision (.5); review agenda for voting meeting, hold list, and ex partes submitted (.25)	8/16/2021	0.75
Brenda D. Villanueva	R20-10-002	PD	read Cal Advocates ex parte notice w/ Comm. Houck office	8/17/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	read revised Proposed Decision, drafted brief summary, and emails w/ CM, JR, CSP, re: same	8/17/2021	1.25
Brenda D. Villanueva	R20-10-002	PD	read Securus post meeting ex parte w/ Guzman Aceves and Shiroma offices, re: proposed decision	8/17/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	review Cal Advocate ex parte for Batjer office, Rechtschaffen office, email w/ CSP, JR, re: same	8/18/2021	0.25
Brenda D. Villanueva	R20-10-002	DR	emails w/ M. Pennywell, re: data responses transmission; review data responses received	8/18/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	review Securus ex parte email and the CSSA letter to the proposed decision; email to CM and CforAT (PG), re:same	8/18/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	attend CPUC Aug 19th Voting meeting public comment and presenation for proposed decision (1); emails w/ CM, CSP, JR, re: same (.25)	8/19/2021	1.25
Brenda D. Villanueva	R20-10-002	DR	receive and review NCIC and ICSolutions data request responses, and email w/ M. Pennywell, and CM, re: same	8/19/2021	0.50
Brenda D. Villanueva	R20-10-002	PD	email to CM and CforAT (PG), re:review Securus ex parte email and the CSSA letter to the proposed decision	8/19/2021	0.25
Brenda D. Villanueva	R20-10-002	PD	emails w/ stakeholder groups, re: CPUC decision adopted	8/20/2021	0.25
Brenda D. Villanueva	R20-10-002	COOR	review TURN outreach materials and call w/ JR, re: stakeholder meeting details, process after interim relief decision	8/23/2021	0.50
Brenda D. Villanueva	R20-10-002	COOR	read final decision compliance section, email w/ JR, re: final decision	8/23/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	read NCIC application for rehearing of Phase 1 decision for interim relief; and take notes	9/21/2021	1.25
Brenda D. Villanueva	R20-10-002	AFR	review PHC notes and prep for discussion with internal TURN team, re: app. for rehearing	9/23/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	call w/ CM, CSP, JR, re: discussion about applications for rehearing and process	9/23/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	call w/ CM, re: collaboration strategy for response to applications for rehearing (.25); strategy and meeting times for ALJ email ruling proposals (.25)	9/23/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	emails w/ Cal Advocates (SM), CforAT (PG), PPI (SR), CM, re: applications for rehearing, coordination	9/23/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	emails w/ PPI(SR), and CM, re: response to apps for rehearings	9/24/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	emails w/ Cal Advocates (SM), CforAT (PG), PPI (SR), CM, re: applications for rehearing, coordination	9/24/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	review Securus application for rehearing to Phase 1 interim relief decision	9/24/2021	1.00
Brenda D. Villanueva	R20-10-002	AFR	review Securus application for rehearing	9/26/2021	1.50
Brenda D. Villanueva	R20-10-002	AFR	call w/ CSP, re: stakeholder outreach meeting agenda and app for rehearing	9/27/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	read Securus application for rehearing and take notes for prepared response	9/27/2021	1.00
Brenda D. Villanueva	R20-10-002	AFR	call w/ CforAT (PG), Cal Advocates (SM), Prison Policy Initiative (SR), CM, re: applications for rehearing response strategy and joint collaboration	9/27/2021	0.75
Brenda D. Villanueva	R20-10-002	AFR	emails w/ CM, CSP, JR, re: discussion with stakeholder group about proposals and applications for rehearing	9/27/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	call w/ CM, re: applications for rehearing response process	9/28/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	emails w/ Cal Advocates (SM), CforAT (PG), PPI (SR), CM, re: applications for rehearing, coordination	9/28/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	emails w/ Cal Advootes (SM), PPI (SR), CforAT(PG), CM, re: Securus application for rehearing and FCC filings	9/28/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	review Securus application for rehearing, draft issue list	9/29/2021	1.00
Brenda D. Villanueva	R20-10-002	AFR	draft issue list for app for rehearing response, and email to/ CM, re: same	9/29/2021	1.00
Brenda D. Villanueva	R20-10-002	AFR	call w/ Cm, re: discuss revised applications for rehearing response and collaboration	9/29/2021	1.00
Brenda D. Villanueva	R20-10-002	AFR	email w/ Prison Policy Initiative (SR), CforAT (PG), and CM, re: issues proposal for response to applications for rehearing	9/29/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	emails w/ CM, Prison Policy Initiative (SR), CforAT (PG), re: response to application for rehearing issues list and delegation of work	9/30/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	emails w/ Prison Policy Initiative (SR), CforAT (PG), CM, re: assigning drafting sections and establishing a drafting schedule (.25)	10/1/2021	0.25



**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	AFR	review application for rehearing examples and CPUC rules	10/1/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	review applications for rehearing and prepare notes for joint response	10/3/2021	3.00
Brenda D. Villanueva	R20-10-002	AFR	calls w/ CM, re: response for application for rehearing	10/4/2021	1.50
Brenda D. Villanueva	R20-10-002	AFR	drafted sections for response to application for rehearing	10/4/2021	5.25
Brenda D. Villanueva	R20-10-002	AFR	emails w/ CforAT (PG), PPI (SR), CM, re: coordinating drafting schedule for response to application for rehearing	10/4/2021	0.25
Brenda D. Villanueva	R20-10-002	AFR	draft section and collaborate on the response to the applications for rehearing	10/5/2021	4.00
Brenda D. Villanueva	R20-10-002	AFR	draft section and collaborate on the response to the applications for rehearing (3); and emails w/ CM, and PPI (SR), CforAT (MK), re: same (.25)	10/6/2021	5.25
Brenda D. Villanueva	R20-10-002	AFR	emails w/ CM, CforAT (PG, MK), Prison Phone Initiative (SR), re: response for applications for petitions and review coordination	10/6/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	call w/ CM, re: coordinating review of response draft (.25); email w/ CM, Prison Policy Initiative (SR), and CforAT (PG, MK), re: coordinating review of response draft to applicatins for rehearing (.25)	10/6/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	revise response to applications for rehearing draft, collobrated with CM, and prepared for filing	10/7/2021	3.25
Brenda D. Villanueva	R20-10-002	AFR	emails w/ CforAT (PG), PPI (SR), CM, re: coordinating drafting schedule for response to application for rehearing	10/7/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	calls w/ CM, M. Kasnitz, P. Goodman and S. Raher, re: coordination of review for response to application for rehearing	10/7/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	read County of San Luis Obispo Sheriff Office letter/response in support of NCIC Application for Rehearing Interim Relief Decision; and email w/ CM, CforAT (PG), Prison Policy Initiative (SR), re: notes about the letter	10/8/2021	0.50
Brenda D. Villanueva	R20-10-002	AFR	review responses filed to the Applications for Rehearing	10/8/2021	2.00
Brenda D. Villanueva	R20-10-002	COMP	prepare intervenor comp claim; messages w/ AS, re: same	6/8/2022	1.00
Brenda D. Villanueva	R20-10-002	COMP	prepare intervenor comp claim; messages w/ AS, re: same	6/9/2022	1.00
Brenda D. Villanueva	R20-10-002	APP	read Securus Reply Brief- Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District) (.5) and prepare strategy (.5)	8/10/2022	1.00
Brenda D. Villanueva	R20-10-002	APP	call w/ CPUC Appellate Division (EG), re: Securus petition, briefs filed in. and intervenor strategy for Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	9/1/2022	0.50
Brenda D. Villanueva	R20-10-002	APP	emails w/ S. Raher, re: court of appeals decision granting Securus petition (.25); and review the court decision in Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	9/8/2022	0.25
Brenda D. Villanueva	R20-10-002	APP	emails w/ CPUC App Division (EG), and S. Raher, re: discussion about Court of Appeals order and next steps for Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District) (.25); and call w/ same and intervenor strategy(.5)	9/9/2022	0.75
Brenda D. Villanueva	R20-10-002	APP	read CPUC Appellate Division letter to court seeking clarification of upcoming deadlines; and emails w/ T. Long and B. Finkelstein, re: same, for the Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	9/12/2022	0.75
Brenda D. Villanueva	R20-10-002	APP	read Court Sep 20 2022 court order for Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	9/20/2022	0.25
Brenda D. Villanueva	R20-10-002	APP	(2nd circuit appeal) call w/ CPUC Appellate (EG), re: court notice of SB 1008 and next steps in Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	10/12/2022	0.50
Brenda D. Villanueva	R20-10-002	APP	(Phase 1 2nd court appeal) review Court oral arguments form, develop strategy for Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	10/31/2022	0.50
Brenda D. Villanueva	R20-10-002	APP	(Phase I Court of Appeals) call w/ CPUC Appellate Division, re: developments in Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	11/2/2022	0.50
Brenda D. Villanueva	R20-10-002	APP	(Phase 1 appeal) determine TURN position, and complete oral argument form to the Second District Court of Appeal for Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	12/5/2022	0.25
Brenda D. Villanueva	R20-10-002	APP	(Appeal) read CA 2nd District opinion for Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	2/1/2023	0.50
Brenda D. Villanueva	R20-10-002	APP	read CA 2nd District Court opinion, Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	2/2/2023	1.25
Brenda D. Villanueva	R20-10-002	Comp	(Comp claim) review rate justifications and hours for advocates and experts	2/27/2023	0.50
Brenda D. Villanueva	R20-10-002	Comp	(comp claim) analyze advocate hours and rate justification discussion	2/27/2023	0.50
Brenda D. Villanueva	R20-10-002	APP	(2nd District appeals) read Court decision to authorize publication; email w/ Cal Advocates, CforAT, in Securus Technologies, LLC v. Public Utilities Com.(Calif. Court of Appeals, 2nd Appellate District)	2/27/2023	0.25
Brenda D. Villanueva	R20-10-002	Comp	(comp claim) review rate justifications (.25) and email w/ H. Goodson, re: comp claim rate justifications for TURN staff (.25)	2/28/2023	0.50
Brenda D. Villanueva	R20-10-002	Comp	(comp claim) draft, edit, and revise comp request for Phase 1 and appellate work	3/22/2023	1.00
Brenda D. Villanueva	R20-10-002	Comp	(comp claim) code hours for comp request for Phase 1 and appellate work	3/24/2023	1.00

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Brenda D. Villanueva	R20-10-002	Comp	(comp claim) draft, edit, and revise comp request for Phase 1 and appellate work	3/25/2023	1.50
Christine Mailloux	R20-10-002	OIR	Analysis of Inmate Calling OIR and email to R. Costa, A. Salas	10/1/2020	0.25
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva and M. Kasnitz re: coordination re: opening comments and strategy on issues	10/6/2020	0.75
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: Inmate Calling OIR and summary and next steps	10/12/2020	0.25
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: OIR	10/13/2020	0.25
Christine Mailloux	R20-10-002	OIR	Analysis of BV memo re: inmate calling OIR and next steps; substantive email to BV re: issues and strategy	10/18/2020	1.25
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: inmate calling opening comments, resarch, strategy and next steps	10/19/2020	2.00
Christine Mailloux	R20-10-002	OIR	Emails to B. Villanueva, re: inmate calling strategy; research on payphones and analogies for regulation	10/21/2020	1.50
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: inmate calling issues and memo and legal research	10/22/2020	0.50
Christine Mailloux	R20-10-002	ORG	Conf call with J. Riviera, C. Pierre, M. Toney and B. Villanueva re: strategy for outreach for inmate calling and next steps	10/22/2020	1.00
Christine Mailloux	R20-10-002	COOR	DW M. Kasnitz re: inmate calling docket and legislative issues as background for opening comments	10/22/2020	0.25
Christine Mailloux	R20-10-002	RES	Review research re: inmate calling and CPCN status; amicus brief	10/22/2020	0.50
Christine Mailloux	R20-10-002	JUR	Call with B. Villanueva re: inmate calling next steps, resaerch and jurisdiction issues; email discussion re: jurisdiction issues	10/23/2020	1.25
Christine Mailloux	R20-10-002	ORG	Call with B. Villanueva re: community organizing and outreach prep (.25); email discussion with organizing team re: emails and upcoming meeting	10/23/2020	0.75
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: inmate calling issues and strategy for opening comments	10/26/2020	0.50
Christine Mailloux	R20-10-002	ORG	DW B. Villanueva re: convening and outline for meeting	10/26/2020	0.25
Christine Mailloux	R20-10-002	RES	Analysis of Leg Committee review of inmate calling issues; review litigation and amicus brief and Court order re: jurisdiction and legal issues	10/26/2020	0.50
Christine Mailloux	R20-10-002	ORG	Analysis of Fact sheet for organizing meeting; DWM. Toney and B. Villanueva re: same and prep for meeting; DW B. Villanueva	10/27/2020	2.00
Christine Mailloux	R20-10-002	ORG	Email discussion re: inmate calling and agenda for meeting; PPH plannng	10/28/2020	0.75
Christine Mailloux	R20-10-002	ORG	Incarcerated Phone Service organizing call; follow up discussion with TURN Team re: same	10/29/2020	1.25
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: outline for comments on incarcerated calling (1.0); further review and revisions to outline	10/29/2020	2.00
Christine Mailloux	R20-10-002	ORG	DW B. Villanueva re: background on calling services and logistics for meeting	10/29/2020	0.50
Christine Mailloux	R20-10-002	OIR	Conf call with Juvenile Detention facility advocates re: opening comments and strategy; information re: phone service usage	11/2/2020	1.00
Christine Mailloux	R20-10-002	JUR	Research on jurisdiction issues re: calling services; email discussion re: comments strategy	11/2/2020	0.75
Christine Mailloux	R20-10-002	OIR	Conf call with J. Rivera, C. Pierre and B. Villanueva re: next steps and strategy with groups	11/2/2020	0.75
Christine Mailloux	R20-10-002	OIR	Review and revise and comment on document re: party participation in proceedings and letter re: PPHs, review Constance draft re: timeline for effective participation; gather template material	11/3/2020	2.00
Christine Mailloux	R20-10-002	RES	Email discussion with B. Villanueva re: key terminology and research for opening comments	11/3/2020	0.25
Christine Mailloux	R20-10-002	PHC	DW B. Villanueva re: PHC	11/4/2020	0.25
Christine Mailloux	R20-10-002	OIR	Email discussion with B. Villanueva, Bianca Tyvek, Constance Pierre re: opening comments	11/4/2020	0.50
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: opening comments and draft; discussion re: Iowa precedent	11/4/2020	1.00
Christine Mailloux	R20-10-002	ORG	Meeting w/Bianca Tylek - Worht Rise, JR, CSP, BV re: stakeholder group and IC program	11/4/2020	1.00
Christine Mailloux	R20-10-002	COOR	Email to Worth Rises re: strategy for opening comments, filing and coalition issues re: party status; substantive discussion re: answers to OIR questions	11/4/2020	0.50
Christine Mailloux	R20-10-002	OIR	Revise opening comments on OIR; research FCC and Court decisions	11/5/2020	3.75
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: comments strategy, next steps and draft review; email discussions re: same	11/5/2020	0.25
Christine Mailloux	R20-10-002	OIR	DW P. Goodman and M. Kasnitz re: strategy for opening comments on inmate calling and research	11/5/2020	1.00
Christine Mailloux	R20-10-002	OIR	Email Discussoin re: opening comments and strategy with B. Tyvek Worth Rises	11/5/2020	0.25
Christine Mailloux	R20-10-002	OIR	Email with groups re: filing comment issues	11/6/2020	0.25
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: draft of inmate calling	11/6/2020	1.50
Christine Mailloux	R20-10-002	JUR	Draft and revise jurisdiction issues for opening comments; research issues	11/8/2020	4.25
Christine Mailloux	R20-10-002	OIR	Email discussion with B. Villanueve re: opening comments; review FCC docs re: same	11/8/2020	0.50
Christine Mailloux	R20-10-002	OIR	Analyze, draft, revise opening comments; Discussions with B. Villanueva re: same	11/9/2020	4.50
Christine Mailloux	R20-10-002	OIR	Receipt and review of opening comments	11/9/2020	0.25
Christine Mailloux	R20-10-002	ORG	Email discussion re: organizing meeting and next steps	11/9/2020	0.25
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: opening comments, prep for reply and strategy	11/10/2020	0.75
Christine Mailloux	R20-10-002	OIR	Emails re: coalition filings and prep for meeting with coalition	11/10/2020	0.25

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Christine Mailloux	R20-10-002	#	Review outline, documents in prep for organizing meeting; emails with B. Villanueva and M. Kasnitz re: next steps	11/11/2020	1.00
Christine Mailloux	R20-10-002	ORG	call with B. Villanueva re: prep for organizing team meeting	11/12/2020	0.25
Christine Mailloux	R20-10-002	ORG	Organizing meeting with Organizing team, allies and B. Villanueva re: inmate calling strategy	11/12/2020	1.50
Christine Mailloux	R20-10-002	OIR	Email discussions re: strategy for reply comments and info from allies and next steps	11/12/2020	0.50
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: summary of opening comments and strategy for reply comments	11/13/2020	0.75
Christine Mailloux	R20-10-002	OIR	Email discussion w/ B. Villanueva re: organizing issues re: incarcerated calling	11/13/2020	0.25
Christine Mailloux	R20-10-002	OIR	Analysis of outline for reply comments; comment and email discussion	11/14/2020	0.75
Christine Mailloux	R20-10-002	OIR	Analysis and review draft reply comments, edit and email discussion with B. Villanueva re: same	11/17/2020	1.25
Christine Mailloux	R20-10-002	OIR	Analysis and revisions to reply comments on OIR	11/18/2020	2.00
Christine Mailloux	R20-10-002	OIR	DW B. Villanueva re: reply comments (.5) and revise draft	11/19/2020	1.25
Christine Mailloux	R20-10-002	PPH	Emails and discussion with organizing re: letter sign on requesting PPHs in proceeding, procedures for groups	11/20/2020	0.50
Christine Mailloux	R20-10-002	PHC	Emails with CforAT re: reply comments; review reply comments and next steps for PHC	11/20/2020	0.25
Christine Mailloux	R20-10-002	PROC	Email to internal team re: organizing and Intervenor Comp meeting; provide samples and research re: same	11/24/2020	0.75
Christine Mailloux	R20-10-002	PHC	DW B. Villanueva re: prep for PHC and strategy for working with groups on scope	11/25/2020	0.25
Christine Mailloux	R20-10-002	PROC	Planning emails re: intervenor comp discussion with ally organizations	11/25/2020	0.25
Christine Mailloux	R20-10-002	PROC	draft handout materials for TURN intervenor compensation workshop	12/1/2020	2.00
Christine Mailloux	R20-10-002	PROC	Prep for and facilitate TURN Intervenor Comp workshop on intervenor comp processes, email discussion re: next steps	12/2/2020	2.25
Christine Mailloux	R20-10-002	PHC	Analysis of ALJ Ruling and information re: PHC, email to team re: same	12/3/2020	0.50
Christine Mailloux	R20-10-002	PHC	Coalition call with allies re: prep for PHC	12/3/2020	1.25
Christine Mailloux	R20-10-002	COOR	DW B. Villanueva and Public Advocates (Ahldstedt, Tran, Johnson) re: coordination of effort for Incarcerated Calling	12/4/2020	0.50
Christine Mailloux	R20-10-002	PHC	Follow up call with B Villanueva re: PHC prep and strategy	12/4/2020	0.25
Christine Mailloux	R20-10-002	PHC	Analysis of PHC instructions and email with TURN team re: next steps and prep for PHC	12/7/2020	0.50
Christine Mailloux	R20-10-002	PHC	DW B. Villanueva re: PHC preparation and coordination and issues to raise; review ALJ Ruling	12/8/2020	1.50
Christine Mailloux	R20-10-002	PPH	Email discussion re: letter requesting PPH in proceeding, revisions and processes; review letter	12/9/2020	0.75
Christine Mailloux	R20-10-002	PHC	Incarcerated Calling PHC (2); email with M. Kasntiz and P. Goodman re: coordination and strategy for PHC (.25)	12/10/2020	2.25
Christine Mailloux	R20-10-002	PHC	DW M. Kasntiz re: follow up from PHC and possible comments on competition issues	12/10/2020	0.25
Christine Mailloux	R20-10-002	PHC	Follow up call with B. Villanueva, J. Rivera, C. Pierre re: PHC planning and next steps	12/11/2020	0.50
Christine Mailloux	R20-10-002	PROC	Email to T. Rosenberg re: intervenor Comp; review ALJ email re: intervenor comp and forward to H. Goodson	12/20/2020	0.50
Christine Mailloux	R20-10-002	PROC	Email with B. Finkelstein re: NOI Rules, requirements by ALJ for new intervenors	12/21/2020	0.25
Christine Mailloux	R20-10-002	PROC	Emails re: work to support Intervenor in incarcerated docket in prep for NOI	12/22/2020	0.50
Christine Mailloux	R20-10-002	CD	Emails re: discussion with CPUC CD Staff re: research on incarcerating calling issues	12/22/2020	0.25
Christine Mailloux	R20-10-002	PROC	DW T. Rosenberg, Media Alliance, re: NOI (.25); Email discussion with ALJ and internal TURN team re: NOI instructions and email to team re: communications to potential organizations interested (.5)	1/5/2021	0.75
Christine Mailloux	R20-10-002	#	DW B. Villanueva re: prep for Staff meeting, FCC research, strategy and next steps	1/6/2021	1.25
Christine Mailloux	R20-10-002	DR	Analysis of draft staff DR, draft scoping memo, and notes in prep for Staff call	1/6/2021	0.50
Christine Mailloux	R20-10-002	CD	Call with CD and B. Villanueva re: incarcerated calling data and fact finding; FCC data and outstanding issues	1/7/2021	1.25
Christine Mailloux	R20-10-002	CD	DW B. Villanueva re: next steps and strategy in incarcerated calling meeting with staff and Pub Adv	1/12/2021	0.50
Christine Mailloux	R20-10-002	CD	Call With B. Villanueva re: setting up CD staff meetings and issues to discuss	1/13/2021	0.75
Christine Mailloux	R20-10-002	CD	Email discussion with CforAT re: CD staffs meetings and HRDC participation	1/13/2021	0.25
Christine Mailloux	R20-10-002	STAFF	Email discussion with B. Villanueva re: meeting with Public Advocates on incarcerated calling and next steps	1/13/2021	0.25
Christine Mailloux	R20-10-002	CD	Call with B. Villanueva, J. Rivera and C. Pierre re: CD staff meetings and outreach(1); email discussion re: same	1/14/2021	1.25
Christine Mailloux	R20-10-002	STAFF	Analysis of Scoping Memo	1/15/2021	0.75
Christine Mailloux	R20-10-002	#	Conf call with B. Villanueva and M. Kasnitz re: strategy for staff outreach and discovery and next steps from Scoping Memo	1/15/2021	1.00
Christine Mailloux	R20-10-002	DR	Email discussion with B. Villanueva re: discovery and me too draft	1/15/2021	0.25
Christine Mailloux	R20-10-002	PROC	Follow up emails with Phone Justice coalition members re: intervenor compensation	1/15/2021	0.25
Christine Mailloux	R20-10-002	PROC	Email discussion with several ally groups and parties re: NOI process	1/17/2021	0.25

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Christine Mailloux	R20-10-002	DR	Analysis of me too DR request; revise, email back to B. Villanueva	1/21/2021	0.25
Christine Mailloux	R20-10-002	DR	Call with B. Villanueva re: discovery and staff meetings strategy and issues to address	1/22/2021	0.50
Christine Mailloux	R20-10-002	CD	Conf call with CPUC Staff (E. VanWambke; K. Sero; A Lau), TURN telecom team and ally groups re: discussion regarding issues related to juvenile justice facilities (1); follow up email to TURN team re: next meeting and strategy for next steps (.25)	1/22/2021	1.25
Christine Mailloux	R20-10-002	CD	call w/ Division Staff (KS, AL, EV), Worth Rises, Root and Rebound, SF Financial Justice Project, Coalition for Family Unity, and TURN (CM, CSP, JR), re: regulation in other states, access to services, in-person and video visitation, service quality, surveillance issues; and summarize notes (1.25)	1/25/2021	1.25
Christine Mailloux	R20-10-002	STAFF	Call with B. Villanueva re: next steps and strategy on interim relief	1/27/2021	0.25
Christine Mailloux	R20-10-002	ORG	Call w/ BV, JR, CSP, re: stakeholder group meeting delegating tasks, debrief on Division meeting logistics and discussion, FCC proceeding, send FCC page for these services to group	1/27/2021	0.50
Christine Mailloux	R20-10-002	COOR	stakeholder meeting w/ TURN (BV, JR, CSP), and Phone Justice Groups (Worth Rises, Children's Defense Fund, Root and Rebound, Media Alliance, and others), re: Division staff meeting debrief, providing subject matter expertise to staff, messaging and relaying anecdotes, interim relief phase and process, state legislation updates	1/28/2021	1.50
Christine Mailloux	R20-10-002	DR	Email discussion with Prison Policy Initiative re: discovery	1/28/2021	0.25
Christine Mailloux	R20-10-002	DR	DW with S. Rahr, B. Villanueva, Andrea Fenster PPI re: strategy for next steps in docket and discovery matters (.5); email discussion with B. Villanueva as follow up and draft follow up email to PPI staff with TURN documents from docket including draft discovery and nondisclosure	1/29/2021	1.25
Christine Mailloux	R20-10-002	DR	Review draft discovery request	1/29/2021	0.25
Christine Mailloux	R20-10-002	PPH	Email with B. Villanueva and TURN team re: PPH processes and Public Advisor office roles and responsibility to establish process to facilitate incarcerated/detained participation	2/10/2021	0.25
Christine Mailloux	R20-10-002	DR	Review draft NDA and email discussion re: revisions and discovery process	2/11/2021	0.50
Christine Mailloux	R20-10-002	PPH	emails w/ B. Villanueva re: TURN response to staff request for information on PPH issues unique to incarcerated; review TURN response and email to B. Villanueva re: same	2/14/2021	0.50
Christine Mailloux	R20-10-002	PPH	DW B. Villanueva re: PPH logistic issues and discussion with CD staff	2/16/2021	0.50
Christine Mailloux	R20-10-002	ORG	DW B. Villanueva re: stakeholder group coordination and TURN team roles	2/16/2021	0.25
Christine Mailloux	R20-10-002	PPH	Emails to TURN staff and internal re: PPH process and logistic improvement strategy	2/17/2021	0.25
Christine Mailloux	R20-10-002	PPH	DW E. VanWambke re: staff feedback on PPH logistic issues and upcoming Scoping Memo; email to team re: same	2/18/2021	0.50
Christine Mailloux	R20-10-002	DR	Analysis of NDAs and signature of Appendix A for discovery access	2/19/2021	0.25
Christine Mailloux	R20-10-002	PPH	Email from Public Advisor office re: PPH and email discussion with TURN team re: strategy and next steps for logistic improvements for PPHs	2/23/2021	0.25
Christine Mailloux	R20-10-002	DR	Review GTL draft NDA and email discussion with B. Villanueva re: same	2/24/2021	0.50
Christine Mailloux	R20-10-002	DR	DW GTL DC Counsel and B. Villanueva re: NDA and discovery process (.5); follow up DW B. Villanueva re: next steps and amendments to NDA and strategy (.5); analysis of proposed edits to the NDA and further edit (.5)	2/25/2021	1.50
Christine Mailloux	R20-10-002	DR	Analysis of Securus NDA and email with B. Villanueva re: strategy and next steps	2/25/2021	0.25
Christine Mailloux	R20-10-002	DR	Email discussion w/ BV re: Securus NDA and strategy for signature	2/28/2021	0.25
Christine Mailloux	R20-10-002	RES	Receipt and analysis of articles re: county contracts on incarcerated calling services; email to team re: impact on Commission proceeding	3/3/2021	0.25
Christine Mailloux	R20-10-002	COOR	Conf call with coalition groups on PPH prep and planning, updates in other states and at FCC	3/4/2021	1.50
Christine Mailloux	R20-10-002	DR	DW B. Villanueva re: NDAs and follow up on discovery requests	3/4/2021	0.25
Christine Mailloux	R20-10-002	DR	Analysis of GTL NDA revisions and B. Villanueva analysis; email discussion re: strategy and next steps in negotiation on NDA	3/8/2021	0.50
Christine Mailloux	R20-10-002	DR	DW B. Villanueva regarding GTL negotiation on NDA and discovery (.75); review follow up email with GTL and revisions	3/9/2021	1.25
Christine Mailloux	R20-10-002	DR	Analysis of Securus NDA, comments and email discussion with B Villanueva re: same	3/10/2021	0.50
Christine Mailloux	R20-10-002	DR	DW B. Villanueva and M. Conaty (GTL counsel) re: NDA and FCC proceeding and protective order	3/11/2021	0.50
Christine Mailloux	R20-10-002	DR	DW B. Villanueva as follow up to GTL discussion and next steps with NDA revisions, discovery production and case strategy and confidentiality rules	3/11/2021	0.50
Christine Mailloux	R20-10-002	DR	Follow up email to M. Conaty re: GTL NDA process and next steps	3/12/2021	0.25
Christine Mailloux	R20-10-002	DR	Analysis of draft Securus NDA and email re: edits to Securus counsel, email to B Villanueva re: same	3/12/2021	0.50
Christine Mailloux	R20-10-002	DR	Email discussion with B. Villanueva and S. Rahr re: discovery to ICS providers and possible Motion to Compel; provide substantive strategy and documents for Motion	3/12/2021	0.50

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Christine Mailloux	R20-10-002	PPH	Email discussion with C. Pierre, J. Rivera, B. Villanueva, M Toney re: PPH and confidentiality issues and summary of discussion with staff re: PPH issues; review PPH flyer and email discussion re: same	3/15/2021	0.50
Christine Mailloux	R20-10-002	DR	Analysis of response by GTL to NDA issues; email discussion with B Villanueva re: next steps and discovery strategy without NDA and response to GTL	3/15/2021	0.25
Christine Mailloux	R20-10-002	RES	Conf call with C. Pierre, J. Rivera, and staff from San Diego Supervisor re: Securus contract and county phone contract	3/17/2021	1.00
Christine Mailloux	R20-10-002	DR	DW A. Salas and B. Villanueva re: ICS NDAs, GTL and Motion to Compel, strategy re: possible response	3/19/2021	0.25
Christine Mailloux	R20-10-002	RES	Analysis of email re: FCC ex parte by some CA parties and positions on calling rates and fees; email discussion with B. Villanueva	3/22/2021	0.25
Christine Mailloux	R20-10-002	DR	Email discussion with B. Villanueva re: next steps in NDA discussion with GTL and contact with GTL re: redacted discovery	3/22/2021	0.25
Christine Mailloux	R20-10-002	DR	Review GTL discovery responses and issues re: redactions; email with B. Villanueva re: same and strategy for response	3/24/2021	0.25
Christine Mailloux	R20-10-002	DR	DW B. Villanueva re: GTL claims of confidentiality and strategy and possible motion; status on Securus and review current discovery of others	3/25/2021	0.50
Christine Mailloux	R20-10-002	STAFF	Email w/ B. Villanueva, re: Interim rate setting ruling	4/6/2021	0.25
Christine Mailloux	R20-10-002	PPH	DW J. Rivera re: PPH protocol, Worth Rises concerns re: incarcerated participation and strategy (.5); review Worth Rises email to J. Koltz and prior emails to staff re: PPH prep and issues re: facility capability; draft detailed email re: ex parte rules and written ex parte on PPH issue	4/8/2021	1.50
Christine Mailloux	R20-10-002	PPH	Review email from J. Rivera re: PPH protocol and suggestions revisions to pass along to CD staff	4/9/2021	0.25
Christine Mailloux	R20-10-002	STAFF	Review summary of ruling re: interim relief and email discussion with B. Villanueva re: same	4/15/2021	0.50
Christine Mailloux	R20-10-002	STAFF	(Staff Proposal) attend meeting w/ TURN and incarcerated/detained phone justice groups, re: interim relief comments, next steps	4/15/2021	0.75
Christine Mailloux	R20-10-002	STAFF	DW B. Villanueva re: strategy for interim relief ruling (.75); review draft memo on strategy re: same (.25)	4/21/2021	1.00
Christine Mailloux	R20-10-002	DR	Emails with B Villanueva re: discovery and NDA issues; email with J. Clark re: Securus NDA and status of discovery	4/21/2021	0.25
Christine Mailloux	R20-10-002	STAFF	Conf call with Public Advocates (K Tran, C. Choe) and B. Villanueva re: interim relief comments	4/22/2021	1.00
Christine Mailloux	R20-10-002	STAFF	DsW B. Villanueva re: interim relief and strategy for comments	4/22/2021	0.50
Christine Mailloux	R20-10-002	DR	Receipt and review email from J. Clark re: Securus Discovery and NDA; email discussion with B. Villanueva re: next steps and analysis of NDA and discovery requests	4/23/2021	0.50
Christine Mailloux	R20-10-002	STAFF	Analysis of draft opening on interim relief and comments and revisions; reply back to B Villanueva; email to CforAT re: same	4/24/2021	1.75
Christine Mailloux	R20-10-002	STAFF	Conf call with B Villanueva, J. Rivera and C. Pierre re: interim rate relief staff proposal, coalition research on FCC and NJ rates and next steps; review email from C. Urie re: interim relief comments and proposals	4/26/2021	1.25
Christine Mailloux	R20-10-002	DR	Review PPI Motion to Compel and ALJ Ruling re: denial based on FCC protective order, analysis for impact on discovery efforts and email to B. Villanueva re: same	4/27/2021	0.25
Christine Mailloux	R20-10-002	STAFF	DW M. Toney re: Incarcerated calling interim relief options and policies	4/28/2021	0.25
Christine Mailloux	R20-10-002	STAFF	DW B. Villanueva re: interim relief comments	4/29/2021	1.25
Christine Mailloux	R20-10-002	STAFF	Call with B. Villanueva re: interim relief comments	4/30/2021	0.75
Christine Mailloux	R20-10-002	STAFF	Analysis of draft of interim relief comments, edit and review	4/30/2021	1.50
Christine Mailloux	R20-10-002	STAFF	Emails w/ B. Villanueva, re: possible ex parte meeting on interim relief; email discussion re: same and strategy for reply on interim relief; DW M. Kasnitz re interim relief strategy and update (.25)	5/7/2021	0.75
Christine Mailloux	R20-10-002	STAFF	DW B. Villanueva re: strategy and questions for reply comments on interim relief (1.25); review draft memo and notes re: same (.5)	5/10/2021	1.75
Christine Mailloux	R20-10-002	STAFF	Conf call with C. Urie, B. Villanueva and J. Rivera re: interim relief reply comments input	5/11/2021	0.75
Christine Mailloux	R20-10-002	STAFF	DW B. Villanueva re: notes for interim relief reply comments (.25); further analysis of notes and comments on strategy and forward to B. Villanueva	5/11/2021	0.50
Christine Mailloux	R20-10-002	STAFF	Analysis of drafts of reply comments on ICS; DsW B. Villanueva re: same and review record	5/12/2021	2.75
Christine Mailloux	R20-10-002	STAFF	DW B. Villanueva re: ex parte meeting with Guzman Aceves office	5/12/2021	0.50
Christine Mailloux	R20-10-002	RES	Review emails re: LA County Bd of Sup proposal to renegotiate contract for incarcerated calling; attend Bd of Supervisor meeting (.5)	5/18/2021	0.75
Christine Mailloux	R20-10-002	STAFF	Conf call with B. Villanueva, J. Rivera and C. Pierre re: interim relief issues and strategy for upcoming Proposed Decision (.75)	5/19/2021	0.75
Christine Mailloux	R20-10-002	ORG	Conf call with B. Villanueva, J. Rivera and C. Pierre re: next steps for organizing (.25)	5/19/2021	0.25
Christine Mailloux	R20-10-002	DR	Review emails on NDA and discovery with Securus, review NDA and email Securus counsel re: updating status and moving forward	6/15/2021	0.50
Christine Mailloux	R20-10-002	PD	Receipt and review PD on Interim Rate relief issues; email discussion re: coalition strategy re: same	7/12/2021	0.25

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Christine Mailloux	R20-10-002	PD	Analysis of Interim rate relief PD; draft notes	7/13/2021	2.00
Christine Mailloux	R20-10-002	PD	Emails re: strategy and next steps in PD analysis and meeting with stakeholders	7/13/2021	0.25
Christine Mailloux	R20-10-002	PD	Draft email and summary of Interim Relief PD	7/14/2021	0.50
Christine Mailloux	R20-10-002	PD	Email DW B. Villanueva re: comments on PD and strategy	7/15/2021	0.25
Christine Mailloux	R20-10-002	PD	Conf call with B. Villanueva and C. Pierre re: strategy for comments on PD and next steps	7/22/2021	0.50
Christine Mailloux	R20-10-002	PD	call w/ outreach stakeholders regarding proposals in PD	7/27/2021	1.00
Christine Mailloux	R20-10-002	EQU	Call with B. Villanueva, J. Rivera, A. Salas, and G. Sandoval re: comments on incarcerated calling PD	7/28/2021	0.75
Christine Mailloux	R20-10-002	PD	Email discussion with B. Villanueva and J. Rivera re: budget language for incarcerated call services	7/28/2021	0.25
Christine Mailloux	R20-10-002	PD	DW B. Villanueva re: opening comments on PD	7/29/2021	1.00
Christine Mailloux	R20-10-002	PD	Email with P. Goodman and M. Kasnitz re: ancillary fees and pass through	7/30/2021	0.25
Christine Mailloux	R20-10-002	PD	Analysis and revisions to comments on ICPJ PD	7/31/2021	1.75
Christine Mailloux	R20-10-002	PD	Review PD opening comments (1.5) and revisions; DsWB. Villanueva (.75)	8/2/2021	2.25
Christine Mailloux	R20-10-002	PD	DW B. Villanueva re: strategy for reply comments on ICPJ issues and review of opening	8/3/2021	0.25
Christine Mailloux	R20-10-002	PD	Review Securus comments and draft notes and write TURN reply	8/4/2021	1.25
Christine Mailloux	R20-10-002	PD	Analysis of draft of reply on PD; editing; email to B. Villanueva	8/8/2021	2.25
Christine Mailloux	R20-10-002	PD	DW B. Villanueva re: revisions to comments on PD and strategy	8/9/2021	0.50
Christine Mailloux	R20-10-002	PD	DW B. Villanueva re possible ex parte strategy and email discussion	8/9/2021	0.50
Christine Mailloux	R20-10-002	COOR	call w/ Cal Advocates (KT) and B. Villanueva, re: meeting with Cal Advocates to discuss ex parte strategy (.25); emails w/ CM, re: meetings strategy for Cal Advocates meeting and ex parte (.25)	8/11/2021	0.50
Christine Mailloux	R20-10-002	PD	DW Pub Advocates re: ex parte strategy (Johnson and Merrill and Tran) and B Villanueva and J. Rivera (.5); review B. Villanueva outline in prep for ex parte meetings and emails re: same	8/12/2021	1.00
Christine Mailloux	R20-10-002	PD	Ex parte meetings with B. Villanueva and J. Rivera and advisors from Batjer (Mullaney) (.5) and Rechtschaffe (Perez-Green) (.5) offices	8/13/2021	1.00
Christine Mailloux	R20-10-002	PD	Email discussion with J. Rivera and B. Villanueva re: ex parte meeting strategy, feedback; Review draft ex parte notices; Call with B. Villanueva and J. Rivera re: prep for meetings (.25)	8/13/2021	0.75
Christine Mailloux	R20-10-002	RES	Review FCC Order re: cable and third party billing services for incarcerated calling services	8/15/2021	0.25
Christine Mailloux	R20-10-002	PD	DW B. Villanueva re: ex parte notices and prep for Commission vote (.5); review draft ex parte meeting	8/16/2021	0.75
Christine Mailloux	R20-10-002	PD	Receipt and review of revisions to PD on interim rates; review email summary from B. Villanueva of edits	8/17/2021	0.25
Christine Mailloux	R20-10-002	AFR	Receipt and review email re: GTL ex parte and Sheriff Letter and possible need for reply to letter	8/19/2021	0.25
Christine Mailloux	R20-10-002	AFR	Email discussion re: strategy on carrier possible App for Rehearing and response	9/7/2021	0.25
Christine Mailloux	R20-10-002	AFR	Receipt and review Apps for Rehearing and email discussion re: strategy for reply and work with other intervenors	9/22/2021	0.25
Christine Mailloux	R20-10-002	AFR	DW B. Villanueva, J. Rivera and C. Pierre re: application for rehearing response and strategy	9/23/2021	0.50
Christine Mailloux	R20-10-002	AFR	DW B. Villanueva on follow up re: application for rehearing tasking and strategy	9/23/2021	0.25
Christine Mailloux	R20-10-002	AFR	Meeting with Pub Adv (Merrill), PPI (Rahe) and CforAT (Goodman) and Villanueva re: logistics and strategy for response to the Applications for Rehearing (.75); email discussion re: same on strategy for App for Rehearing work	9/27/2021	1.00
Christine Mailloux	R20-10-002	AFR	DW B. Villanueva re: Application for rehearing strategy (.5); email discussion re: same with Pub Adv and CforAT; analysis and review of NCIC and Securus App for Rehearing in prep for response	9/28/2021	2.75
Christine Mailloux	R20-10-002	AFR	Attend ICPJ Stakeholder meeting discussion re: App for Rehearing impact on rates	9/28/2021	0.50
Christine Mailloux	R20-10-002	AFR	DW B. Villanueva re: response to App for Rehearing issue spotting, outline and strategy	9/29/2021	1.00
Christine Mailloux	R20-10-002	AFR	Email discussion with B. Villanueva re: App for Rehearing responses and strategy	10/1/2021	0.25
Christine Mailloux	R20-10-002	AFR	DsWB. Villanueva re: App for Rehearing strategy and issues spotting and legal research (1.5); email discussions re: same with PPI and CforAT re: standard of review and arguments on procedural issues	10/4/2021	2.00
Christine Mailloux	R20-10-002	AFR	Draft and legal research on takings issues for response to App for Rehearing	10/4/2021	2.00
Christine Mailloux	R20-10-002	AFR	Draft response to App for Rehearing on takings claims, legal research (3.75) and DW S. Rahe from PPI (.25) re: same; email discussion with B. Villanueva re: same (.25)	10/5/2021	4.25
Christine Mailloux	R20-10-002	AFR	Drafted response to App for Rehearing, review and edit full document; research cites and section on hearings (5.25) ; emails with B. Villanueva and PPI and CforAT re: same (.5); DW B. Villanueva re: strategy and next steps for response to rehearing (.25)	10/6/2021	6.00
Christine Mailloux	R20-10-002	AFR	Drafted response to App for Rehearing and review and edit (3); phone call and email with B. Villanueva, M. Kasnitz, P. Goodman and S. Rahe re: same (.5)	10/7/2021	3.50

**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Constance Slider Pierre	R20-10-002	OIR	Review OIR	10/12/2020	1.50
Constance Slider Pierre	R20-10-002	ORG	Co-host stakeholder meeting of phone justice advocates	10/29/2020	2.00
Constance Slider Pierre	R20-10-002	COOR	Meeting w/ Dominique Nong - Children's Defense Fund re: TURN stakeholder group and IC process	11/2/2020	1.00
Constance Slider Pierre	R20-10-002	COOR	Meeting w/Bianca Tylek - Worht Rise, JR, CM, BV re: stakeholder group and IC program	11/4/2020	1.00
Constance Slider Pierre	R20-10-002	ORG	Stakeholder prep call w/ TURN attorneys C. Mailloux and B. Villanueva	11/10/2020	1.00
Constance Slider Pierre	R20-10-002	PROC	IDPJ Stakeholder call re: prep for opening comments, party status, IC program	11/21/2020	1.50
Constance Slider Pierre	R20-10-002	PROC	draft strategy for Intervenor compensation workshop	11/30/2020	1.00
Constance Slider Pierre	R20-10-002	PROC	facilitate the TURN Intervenor Compensation Workshop w/stakeholders	12/2/2020	2.00
Constance Slider Pierre	R20-10-002	PROC	IDPJ stakeholder planning call party status, IC and strategic coordination	12/3/2020	1.50
Constance Slider Pierre	R20-10-002	CD	call w/ Division Staff (KS, EV, AL), TURN (CSP, CM, JR, BV), Children's Defense Fund of California (DN), Media Alliance (TR), Returning Home Foundation (CU), Pacific Juvenile Defender Center (SB), re: juvenile facility calling services, access to services, service quality, rates, other issues (1)	1/22/2021	1.00
Constance Slider Pierre	R20-10-002	CD	call w/ Division Staff (KS, AL, EV), Worth Rises, Root and Rebound, SF Financial Justice Project, Coalition for Family Unity, and TURN (CM, CSP, JR, BV), re: regulation in other states, access to services, in-person and video visitation, service quality, surveillance issues; and summarize notes (1.25)	1/25/2021	1.25
Constance Slider Pierre	R20-10-002	ORG	Call w/ BV, JR, CM, re: stakeholder group meeting delegating tasks, debrief on Division meeting logistics and discussion, FCC proceeding, send FCC page for these services to group	1/27/2021	0.50
Constance Slider Pierre	R20-10-002	COOR	TURN stakeholder meeting w/ TURN (BV, JR, CM), and Phone Justice Groups (Worth Rises, Children's Defense Fund, Root and Rebound, Media Alliance, and others), re: Division staff meeting debrief, providing subject matter expertise to staff, messaging and relaying anecdotes, interim relief phase and process, state legislation updates	1/28/2021	1.50
Constance Slider Pierre	R20-10-002	PPH	call w/ Division Staff (K. Serle, A. Lau), B. Villanueva, JR, re: public participation hearings, accommodations needed for individuals worried about retribution for speaking out, the possibility of having incarcerated/detained participation, timing and the amount of PPHs, provider participation (.75)	2/3/2021	0.75
Constance Slider Pierre	R20-10-002	RES	attended Aspen Institute and San Francisco Justice Project on jail calls and commissary mark ups	2/23/2021	1.00
Constance Slider Pierre	R20-10-002	COOR	attend Phone Justice Group video meeting, re: public participation hearings, recent state and San Diego County news, strategy	3/4/2021	1.50
Constance Slider Pierre	R20-10-002	ORG	Prep call with B. Villanueva, J. Rivera and C. Mailloux, re: coalition call and PPH prep and planning and developments in counties with 'free' calls	3/4/2021	0.50
Constance Slider Pierre	R20-10-002	PPH	Call w/Karo CPUC staff re: PPH concerns processes for inclusion and anonymity for individuals and families of those detained or incarcerated, fear of retribution	3/15/2021	1.00
Constance Slider Pierre	R20-10-002	RES	San diego phone call w/ SDC Public Defender & County Supervisor Nora Vargas' office, re: Securus contract and county phone contract	3/17/2021	1.00
Constance Slider Pierre	R20-10-002	COOR	call w/ Safe Return, re: coordination and logistics strategy for PPH's April 2021 participation	3/26/2021	1.00
Constance Slider Pierre	R20-10-002	STAFF	(Staff Proposal) attend meeting w/ TURN and incarcerated/detained phone justice groups, re: interim relief comments, next steps	4/15/2021	0.75
Constance Slider Pierre	R20-10-002	ORG	call w/ JR, Stakeholder Meeting (Debrief)	4/15/2021	0.50
Constance Slider Pierre	R20-10-002	ORG	Workshop_Storytelling,Debrief- attend public participation hearing training with TURN	4/21/2021	0.50
Gabriela Sandoval	R20-10-002	EQU	Read Interim relief proposed decision for equity concerns	7/28/2021	1.00
Gabriela Sandoval	R20-10-002	EQU	Call with TURN team re: response to PD and equity concerns	7/28/2021	0.75
Gabriela Sandoval	R20-10-002	EQU	revise TURN PD opening comments	7/31/2021	0.50
Gabriela Sandoval	R20-10-002	EQU	revise TURN PD opening comments	8/1/2021	1.00
Jorge Rivera	R20-10-002	OIR	Review the OIR	10/12/2020	2.00
Jorge Rivera	R20-10-002	ORG	Prep for Roundtable (research & compile list of stakeholders)	10/16/2020	2.25
Jorge Rivera	R20-10-002	ORG	Prepare agenda and materials for Roundtable (outreach to stakeholders)	10/23/2020	1.00
Jorge Rivera	R20-10-002	ORG	Co-host stakeholder meeting of phone justice advocates	10/29/2020	2.00
Jorge Rivera	R20-10-002	COOR	Met with TURN stakeholder (Children's Defense Fund), re: participation in OIR and b	11/2/2020	1.00
Jorge Rivera	R20-10-002	COOR	Meeting w/Bianca Tylek - Worht Rise, CSP, CM, BV re: stakeholder group and IC program	11/4/2020	1.00
Jorge Rivera	R20-10-002	ORG	Prep with attorneys Christine Mailloux and Brenda Villanueva	11/10/2020	1.00
Jorge Rivera	R20-10-002	ORG	Stakeholder group meeting prep strategy	11/12/2020	0.50
Jorge Rivera	R20-10-002	ORG	Stakeholder group meeting (actual) - prep for opening comments, party status and Intervenor Comp status	11/12/2020	1.50
Jorge Rivera	R20-10-002	PROC	Coordination of stakeholders for letter advocacy concerning scope of proceedings	11/20/2020	3.25
Jorge Rivera	R20-10-002	PROC	Intervenor Compensation Workshop preparation	11/30/2020	3.50
Jorge Rivera	R20-10-002	PROC	attend the TURN Intervenor Compensation Workshop w/stakeholders	12/2/2020	2.00
Jorge Rivera	R20-10-002	PROC	Stakeholder Meeting (Prep) for IDPJ stakeholder planning call party status, IC and strategic coordination	12/3/2020	1.00
Jorge Rivera	R20-10-002	PROC	Stakeholder Meeting (actual) -- planning on party status, Intervenor Compensation and strategic coordination	12/3/2020	1.50
Jorge Rivera	R20-10-002	COOR	TURN Stakeholder Meeting (Worth Rises, with attorney Brenda Villanueva)_prep and actual	12/16/2020	1.50



**R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
Attorney Time Sheets**

Staff	Case #	Code	Description	Date	Time
Jorge Rivera	R20-10-002	CD	Internal meeting w/TURN attorneys re: CPUC CD request for discussion/meeting w key stakeholders	1/14/2021	1.00
Jorge Rivera	R20-10-002	CD	Outreach and communication with key stakeholders in preparation for conversation with CPUC CD staff	1/20/2021	2.00
Jorge Rivera	R20-10-002	CD	call w/ Division Staff (KS, EV, AL), TURN (CSP, CM, JR, BV), Children's Defense Fund of California (DN), Media Alliance (TR), Returning Home Foundation (CU), Pacific Juvenile Defender Center (SB), re: juvenile facility calling services, access to services, service quality, rates, other issues (1)	1/22/2021	1.00
Jorge Rivera	R20-10-002	CD	call w/ Division Staff (KS, AL, EV), Worth Rises, Root and Rebound, SF Financial Justice Project, Coalition for Family Unity, and TURN (CM, CSP, JR, BV), re: regulation in other states, access to services, in-person and video visitation, service quality, surveillance issues; and summarize notes (1.25)	1/25/2021	1.25
Jorge Rivera	R20-10-002	ORG	Call w/ BV, CM, CSP, re: stakeholder group meeting delegating tasks, debrief on Division meeting logistics and discussion, FCC proceeding, send FCC page for these services to group	1/27/2021	0.50
Jorge Rivera	R20-10-002	COOR	TURN Stakeholder meeting (Prep)	1/28/2021	0.50
Jorge Rivera	R20-10-002	COOR	TURN stakeholder meeting w/ TURN (BV, CM, CSP), and Phone Justice Groups (Worth Rises, Children's Defense Fund, Root and Rebound, Media Alliance, and others), re: Division staff meeting debrief, providing subject matter expertise to staff, messaging and relaying anecdotes, interim relief phase and process, state legislation updates	1/28/2021	1.50
Jorge Rivera	R20-10-002	PPH	call w/ Division Staff (K. Serle, A. Lau), CSP, B. Villanueva, re: public participation hearings, accommodations needed for individuals worried about retribution for speaking out, the possibility of having incarcerated/detained participation, timing and the amount of PPHs, provider participation (.75)	2/3/2021	0.75
Jorge Rivera	R20-10-002	COOR	Outreach to newly identified TURN stakeholders for participation in the CPUC proceeding	2/10/2021	1.50
Jorge Rivera	R20-10-002	ORG	Communications work for stakeholders	2/16/2021	1.00
Jorge Rivera	R20-10-002	COOR	Outreach to new TURN stakeholder (Media Justice) for involvement in CPUC proceeding	2/22/2021	1.00
Jorge Rivera	R20-10-002	RES	attended Aspen Institute and San Francisco Justice Project on jail calls and commissary mark ups	2/23/2021	1.00
Jorge Rivera	R20-10-002	COOR	attend Phone Justice Group video meeting, re: public participation hearings, recent state and San Diego County news, strategy	3/4/2021	1.50
Jorge Rivera	R20-10-002	ORG	Stakeholder Meeting (Prep)	3/4/2021	0.50
Jorge Rivera	R20-10-002	ORG	Stakeholder Meeting (Debrief)	3/4/2021	0.50
Jorge Rivera	R20-10-002	PPH	Call w/ Karo CPUC staff re: PPH concerns processes for inclusion and anonymity for individuals and families of those detained or incarcerated, fear of retribution	3/15/2021	1.00
Jorge Rivera	R20-10-002	RES	San diego phone call w/ SDC Public Defender & County Supervisor Nora Vargas' office, re: Securus contract and county phone contract	3/17/2021	1.00
Jorge Rivera	R20-10-002	COOR	call to Safe Return, re: outreach strategy for PPH's April 2021 participation	3/26/2021	1.00
Jorge Rivera	R20-10-002	COOR	Outreach to new TURN stakeholder (Pitzer College), re April 2021 PPHs	4/6/2021	1.00
Jorge Rivera	R20-10-002	COOR	Research discussion with Andrey Garcia Ponce de Leon (Immigrant Detention Centers)	4/9/2021	1.00
Jorge Rivera	R20-10-002	ORG	Stakeholder Meeting (Prep)	4/15/2021	0.50
Jorge Rivera	R20-10-002	STAFF	(Staff Proposal) attend meeting w/ TURN and incarcerated/detained phone justice groups, re: interim relief comments, next steps	4/15/2021	0.75
Jorge Rivera	R20-10-002	ORG	Call w/ CSP, Stakeholder Meeting (Debrief)	4/15/2021	0.50
Jorge Rivera	R20-10-002	ORG	Workshop_Storytelling (prep)	4/21/2021	0.50
Jorge Rivera	R20-10-002	ORG	Workshop_Storytelling, Debrief - attend public participation hearing training with TURN	4/21/2021	0.50
<b>Substantial Total</b>					<b>718.00</b>
<b>Comp Total</b>					<b>15.75</b>
<b>Grand Total</b>					<b>733.75</b>

**Attachment 3**

TURN Hours Allocated by Issue

Number R.20-10-002 (Incarcerated Person Calling) TURN Compensation Claim  
TURN Hours Allocated by Issue

			RES	OIR	JUR	ORG	COOR	PROC	CD	PHC	DR	PPH	STAFF	PD	EQU	AFR	APP	#	Substantive Hours	Substantive \$\$\$	COMP	Compensation (iComp)	Travel	Compensatio n (Travel)	
	Billing Period	Hourly Rate																			1/2 of hourly rate		1/2 of hourly rate		
Ashley Salas	2022	\$415	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	\$ -	7.00	\$ 1,452.50	-	\$ -
Brenda D. Villanueva	2020	\$350	26.25	90.00	8.75	21.00	7.75	10.25	0.25	11.25	0.25	-	-	-	-	-	-	-	-	175.75	\$ 61,512.50	-	\$ -	-	\$ -
Brenda D. Villanueva	2021	\$410	27.75	-	-	3.25	6.75	0.50	17.00	0.25	43.75	9.00	68.75	67.25	1.50	40.50	-	2.75	-	289.00	\$ 118,490.00	1.75	\$ 358.75	-	\$ -
Brenda D. Villanueva	2022	\$465	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.25	-	-	5.25	\$ 2,441.25	2.00	\$ 465.00	-	\$ -
Brenda D. Villanueva	2023	\$510	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.00	-	-	2.00	\$ 1,020.00	5.00	\$ 1,275.00	-	\$ -
Christine Mailloux	2020	\$510	1.25	34.50	6.25	9.50	1.25	6.50	0.25	7.75	-	1.25	-	-	-	-	-	-	-	69.50	\$ 35,445.00	-	\$ -	-	\$ -
Christine Mailloux	2021	\$700	2.50	-	-	1.00	3.50	1.25	6.50	-	14.25	4.50	19.75	18.75	0.75	24.75	-	2.25	-	99.75	\$ 69,825.00	-	\$ -	-	\$ -
Constance Slider Pierre	2020	\$200	-	1.50	-	3.00	2.00	6.00	-	-	-	-	-	-	-	-	-	-	-	12.50	\$ 2,500.00	-	\$ -	-	\$ -
Constance Slider Pierre	2021	\$200	2.00	-	-	2.00	4.00	-	2.25	-	-	1.75	0.75	-	-	-	-	-	-	12.75	\$ 2,550.00	-	\$ -	-	\$ -
Gabriela Sandoval	2021	\$450	-	-	-	-	-	-	-	-	-	-	-	-	3.25	-	-	-	-	3.25	\$ 1,462.50	-	\$ -	-	\$ -
Jorge Rivera	2020	\$125	-	2.00	-	8.25	3.50	11.25	-	-	-	-	-	-	-	-	-	-	-	25.00	\$ 3,125.00	-	\$ -	-	\$ -
Jorge Rivera	2021	\$125	2.00	-	-	4.50	9.00	-	5.25	-	-	1.75	0.75	-	-	-	-	-	-	23.25	\$ 2,906.25	-	\$ -	-	\$ -
TOTAL			61.75	128.00	15.00	52.50	37.75	35.75	31.50	19.25	58.25	18.25	90.00	86.00	5.50	65.25	7.25	6.00	718.00	\$ 301,277.50	15.75	\$ 3,551.25	-	\$ -	
TOTAL % HOURS ALLOCATED			8.60%	17.83%	2.09%	7.31%	5.26%	4.98%	4.39%	2.68%	8.11%	2.54%	12.53%	11.98%	0.77%	9.09%	1.01%	0.84%	100.00%						

Substantial Contribution	\$ 301,277.50
Intervenor iComp Compensation	\$ 3,551.25
Expenses Compensation	
<b>Grand Total</b>	<b>\$ 304,828.75</b>

**Attachment 4**

Resume for Jorge Rivera

# Jorge Rivera

1827 Orange Grove Road, Duarte, CA 91010  
Tel. (310) 766-3246 Email: [jrivera6887@gmail.com](mailto:jrivera6887@gmail.com)

---

## WORK EXPERIENCE

### **Tenants Together**

*Southern CA Regional Coordinator*

Southern CA  
**January 2019 to Present**

- Recruit new member organizations, allies and intersectional partners into state and regional networks
- Provide technical assistance, education, support and resources for tenants, members, allies and partners
- Directly assist in the development of new tenant associations, unions and alliances
- Actively expanding tenant lawyer networks and connecting them to grassroots organizing efforts
- Plan, coordinate and facilitate regional and statewide tenant and lawyer assemblies
- Lead on local and statewide campaign development, communication strategies and political analysis
- Work with state and national coalitions developing collective long-term strategies and tactics
- Provide direct tenant counseling and training to tenants, community based organizations and allies
- Politically advocate for local and state policies through public speaking, civic and media engagement
- Support organizing and advocacy utilizing management systems such as Action Network and Salesforce

### **Long Beach Residents Empowered (LiBRE)**

*Founder / Program Director*

Long Beach, CA  
**January 2016 to March 2019**

- Facilitate advisory board meetings, workgroup planning and member dialogue
- Developed campaign, policy, overall communications and legislative strategies
- Built community base of membership and identified leaders through community outreach strategies
- Identify and develop strategic relationships with both existing and new organizational partners
- Lead and execute organizing trainings, develop curriculum and leadership opportunities
- Conduct and facilitate 1-1 and home meetings with residents, members and technical assistance
- Actively participate in related local, state-wide and national coalitions / campaigns
- Successfully raise funds for events, projects and meetings
- Develop relationships with funding organizations, write Letters of Intent and submit grant applications

### **Long Beach Community Action Partnership**

*Prop 47 Outreach Coordinator*

Long Beach, CA  
**April 2016 to November 2016**

- Plan and coordinate canvassing strategies and efforts
- Recruit and coordinate volunteers for canvassing and outreach
- Participate in local and statewide coalition campaign development
- Plan, coordinate and implement online communications strategies
- Develop and facilitate production of Public Service Announcements and video testimonials

### **Housing Long Beach**

*Community Organizer*

Long Beach, CA  
**Dec 2013 to January 2016**

- Aid in the development of campaign policy, overall communications and legislative strategy
- Coordinate and execute grassroots communications strategies with staff, leaders and allies
- Build community base and identify leaders through community outreach strategies
- Promote Housing Long Beach platform through outreach efforts with churches, schools, businesses, housing complexes and community groups
- Identify and develop strategic relationships with both existing and new institutional partners
- Lead and execute organizing trainings, develop curriculum and leadership opportunities
- Build campaign support by holding 1-1s, home meetings with residents and partner organizations
- Build coalition support with a wide range of likely and unlikely allies
- Actively participate in related local and state-wide coalitions

### **Conscious Community Coalition (C<sup>3</sup>)**

*Founding Member*

Long Beach, CA  
**Jan 2012 to May 2014**

### **City of Long Beach, Development Services**

*Community Service Worker*

Long Beach, CA  
**Sept 2011 to Sept 2012**

## WORK EXPERIENCE (Continued)

<b>Harbor Area Farmers Markets</b> <i>Market Manager</i>	Long Beach, CA <b>Jan 2011 to Jan 2012</b>
<b>Bienes Capital, Inc.</b> <i>Real Estate Professional / Co-owner</i>	Long Beach, CA <b>2003 to 2011</b>
<b>Harbor Regional Center</b> <i>Case Manager, Early Childhood Services</i>	Torrance, CA <b>2001 to 2003</b>
<b>Wings of Refuge Foster Family Agency</b> <i>Program Director</i>	Inglewood, CA <b>2000 to 2001</b>
<b>Aspira Foster Family Agency</b> <i>Program Manager, Inclusion Facilitator</i>	Culver City, CA <b>1997 to 2000</b>

---

## VOLUNTEER & TRAINING EXPERIENCE

<b>California Conference for Equality and Justice</b> <i>Restorative Justice Circle Keeper</i>	Long Beach, CA <b>2018</b>
<b>Capacitar International</b> <i>Energy Based Trauma Healing Facilitator</i>	Santa Barbara, CA <b>2017</b>
<b>Trauma Resource Institute</b> <i>Certified Community Resiliency Model Facilitator</i>	Pomona, CA <b>2017</b>
<b>ECHO Parenting and Education</b> <i>Certified Trauma Informed Nonviolent Parent Educator</i>	Los Angeles, CA <b>2016</b>
<b>Centro Shalom Advanced Organizing Institute</b> <i>Community Organizing Training Program</i>	Long Beach, CA <b>2013</b>
<b>Housing Long Beach</b> <i>Communications Team Member</i>	Long Beach, CA <b>2013</b>
<b>Neighborhood Leadership Program</b> <i>Leadership Training Facilitator</i>	Long Beach, CA <b>2012 to 2014</b>
<b>California Conference for Equality and Justice</b> <i>Human Relations Education &amp; Facilitator Program</i>	Long Beach, CA <b>2012</b>
<b>Neighborhood Leadership Program</b> <i>Community Leadership Training Graduate</i>	Long Beach, CA <b>2011</b>

---

## EDUCATION

<i>California State University, Long Beach</i> Bachelor of Arts, Psychology/ Philosophy	Long Beach, CA <b>June 1997</b>
--	------------------------------------

---

## LANGUAGES

Fluent bilingual speaker and interpreter, English and Spanish

---

References Available Upon Request

# Jorge Rivera

1907 Shamrock Avenue, Duarte, CA 91010  
Tel. (310) 766-3246 Email: [jrivera6887@gmail.com](mailto:jrivera6887@gmail.com)

---

## WORK EXPERIENCE

### **Your Home Sold Guaranteed Realty**

*Real Estate Professional*

Southern CA  
**May 2022 to Present**

- Inform and educate of public of market conditions, loan options, 1st time homebuyer programs
- Attend daily and weekly training to stay current with every changing market conditions
- Develop and implement communications strategies, social media strategies and campaigns
- Promote sales of client's homes / support search and purchase of homes for clients
- Develop training and workshops for credit establishment, building and repair
- Research and develop affordable home development, purchase and subsidizing options

### **The People's Resource Center / Healing and Justice Center (worker, self-directed nonprofit)**

*Founder / Executive Co-Director*

Southern CA  
**February 2020 to Present**

- Support with board / staff development, meetings, and 1-1s
- Oversee Tenant Hotline, advocacy and building organizing
- Actively participate in related local, state-wide and national coalitions / campaigns
- Identify and develop strategic relationships with both existing and new organizational partners
- Lead organizational development, fundraising, grant opportunities and contract services
- Develop campaign, policy, overall communications and legislative strategies
- Develop housing, financial and foreclosure prevention counseling services

### **The Utility Reform Network**

*Southern CA Regional Organizer*

Southern CA  
**October 2020 to April 2022**

- Recruit new member organizations, allies and intersectional partners into state and regional networks
- Organize, design, develop or source training programs for members, organizations and allies
- Lead on local and statewide campaign development, communication strategies and political analysis
- Provide direct energy counseling and training to members, community based organizations and allies
- Politically advocate for state policies through public speaking, civic and media engagement
- Support organizing and advocacy utilizing management systems such as Action Network and Salesforce

### **Tenants Together**

*Southern CA Regional Coordinator*

Southern CA  
**January 2019 to October 2020**

- Recruit new member organizations, allies and intersectional partners into state and regional networks
- Provide technical assistance, education, support and resources for tenants, members, allies and partners
- Directly assist in the development of new tenant associations, unions and alliances
- Actively expanding tenant lawyer networks and connecting them to grassroots organizing efforts
- Plan, coordinate and facilitate regional and statewide tenant and lawyer assemblies
- Lead on local and statewide campaign development, communication strategies and political analysis
- Work with state and national coalitions developing collective long-term strategies and tactics
- Provide direct tenant counseling and training to tenants, community based organizations and allies
- Politically advocate for local and state policies through public speaking, civic and media engagement
- Support organizing and advocacy utilizing management systems such as Action Network and Salesforce

### **Long Beach Residents Empowered (LiBRE)**

*Founder / Program Director*

Long Beach, CA  
**January 2016 to March 2019**

- Facilitate advisory board meetings, workgroup planning and member dialogue
- Developed campaign, policy, overall communications and legislative strategies
- Built community base of membership and identified leaders through community outreach strategies
- Identify and develop strategic relationships with both existing and new organizational partners
- Lead and execute organizing trainings, develop curriculum and leadership opportunities
- Conduct and facilitate 1-1 and home meetings with residents, members and technical assistance
- Actively participate in related local, state-wide and national coalitions / campaigns
- Successfully raise funds for events, projects and meetings

## WORK EXPERIENCE (Continued)

- Develop relationships with funding organizations, write Letters of Intent and submit grant applications

### Long Beach Community Action Partnership

Long Beach, CA

*Prop 47 Outreach Coordinator*

(Temporary) **April 2016 to November 2016**

- Plan and coordinate canvassing strategies and efforts
- Recruit and coordinate volunteers for canvassing and outreach
- Participate in local and statewide coalition campaign development
- Plan, coordinate and implement online communications strategies
- Develop and facilitate production of Public Service Announcements and video testimonials

### Housing Long Beach

Long Beach, CA

*Community Organizer*

**Dec 2013 to January 2016**

- Developed campaign policy, overall communications and legislative strategy
- Coordinate and execute grassroots communications strategies with staff, leaders and allies
- Build community base and identify leaders through community outreach strategies
- Promote Housing Long Beach platform through outreach efforts with churches, schools, businesses, housing complexes and community groups
- Identify and develop strategic relationships with both existing and new institutional partners
- Lead and execute organizing trainings, develop curriculum and leadership opportunities
- Build campaign support by holding 1-1s, home meetings with residents and partner organizations
- Build coalition support with a wide range of likely and unlikely allies
- Actively participate in related local and state-wide coalitions

*(Prior work experience available upon request)*

---

## VOLUNTEER & TRAINING EXPERIENCE

### California Conference for Equality and Justice

Long Beach, CA

*Restorative Justice Circle Keeper*

**2018**

### Capacitar International

Santa Barbara, CA

*Energy Based Trauma Healing Facilitator*

**2017**

### Trauma Resource Institute

Pomona, CA

*Certified Community Resiliency Model Facilitator*

**2017**

### ECHO Parenting and Education

Los Angeles, CA

*Certified Trauma Informed Nonviolent Parent Educator*

**2016**

*(Prior volunteer experience available upon request)*

---

## EDUCATION

*California State University, Long Beach*  
Bachelor of Arts, Psychology/ Philosophy

Long Beach, CA  
**June 1997**

---

## LANGUAGES

Fluent bilingual speaker and interpreter, English and Spanish

---

*References Available Upon Request*



**Attachment 5**

Exhibit Communications Division meetings with subject matter champions, Phase 1

**Subject:** RE: R.20-10-002 - Checking in about Meeting with Advocates  
**Date:** Thursday, January 21, 2021 at 11:47:42 AM Pacific Standard Time  
**From:** Serle, Karo  
**To:** Jorge Rivera  
**CC:** Brenda Villanueva, Constance Slider Pierre  
**Attachments:** image002.png

Jorge,

Thank you for your message. Staff will facilitate the call. We are reaching out to service providers and advocates to gather background information on the issues of calling services for incarcerated populations. The discussions are informal and will be used by staff for the purpose of advising on the Rulemaking. Thank you the agenda, and look forward to the discussions at our meetings.

Karo Serle  
California Public Utilities Commission.  
Communications Division.

---

**From:** Jorge Rivera <jrivera@turn.org>  
**Sent:** Thursday, January 21, 2021 11:19 AM  
**To:** Serle, Karo <karo.serle@cpuc.ca.gov>  
**Cc:** Brenda Villanueva <bvillanueva@turn.org>; Constance Slider Pierre <cpierre@turn.org>  
**Subject:** RE: R.20-10-002 - Checking in about Meeting with Advocates

Hello Karo,

Thank you so much for requesting and coordinating these discussions with advocates and stakeholders. I wanted to reach out directly to introduce myself and ask some questions regarding these upcoming meetings.

I am the Organizing and Advocacy Campaign Director with TURN and I am leading our campaign efforts on this docket and directly in communication with many of the stakeholders involved. I look forward to continuing to work with you and CPUC staff as we proceed.

As to the discussions, I appreciate you sharing some agenda topics for discussion and I wanted to check in with you regarding expectations of facilitation of the meetings.

- Is it your expectation, we at TURN will be facilitating these discussions or will division staff be facilitating them?

Regardless, we would like to propose the following agendas for each of the discussions:

Juvenile Call - 1/22

1. Introductions and Land Acknowledgement - 5 min
2. Access (council, family, school, therapy) - 15 min
3. Payment structure (plans/rates) - 15 min
4. Service quality - 10 min
5. Other issues - 10 min
6. Next steps and closing - 5 min

**Adult Call - 1/25**

1. Introduction and Land Acknowledgement - 5 min
  2. Regulation in other states 10 min
  3. Access in California 15 min
  4. In person v. Remote video -10 min
  5. Use of tablets and other devices - 10 min
  6. Other issues - 10 min
  7. Next steps and closing - 5 min\*
- Additionally, if you all have specific questions we might be able to send ahead of time to the advocates, I believe it will make for a smoother discussion due to better preparation. I am sure there is lots to say and would like everyone to have the opportunity to contribute.
  - As such, I was wondering if there will be consideration for follow up (if needed). If not in the form of another meeting, possibly individually reaching out to stakeholders or an [online] survey/questionnaire.

Please feel free to connect with me directly. I am cc'ing our Organizing Director, Constance Slider-Pierre as well as Brenda Villanueva on this email.

Thank you so much in advance. Looking forward to speaking with you soon.

In peace and solidarity,

--

**Jorge Rivera**

Organizing & Advocacy Campaign Director

**Mailing Address:**

TURN - The Utility Reform Network  
268 Bush Street, #3933  
San Francisco, CA 94104

**Contact:**

Main: (415) 929-8876  
[JRivera@TURN.org](mailto:JRivera@TURN.org)



IMPORTANT NOTICE: This e-mail (including attachments) is confidential and intended only for the addressee(s) named above. If you have received this e-mail in error, please delete it, notify the sender and do not retain, read, copy or disseminate this e-mail. This e-mail may not be provided to any other party without the sender's consent.

**Attachment 6**

Exhibit Advocacy to improve logistics of public participation hearings, Phase 1

**Subject:** Re: Incarcerated calling

**Date:** Thursday, February 4, 2021 at 1:33:21 PM Pacific Standard Time

**From:** Brenda Villanueva

**To:** Serle, Karo

**CC:** Constance Slider Pierre, Jorge Rivera, Christine Mailloux

Hello Karo,

Thank you for your willingness to figure out how to allow for the detained individuals an ability to weigh in during a live PPH. I am adding my colleagues in case they know the answers to your questions below. If we don't know, we can certainly reach out to our partners with more first-hand knowledge.

Brenda

---

**From:** Serle, Karo <karo.serle@cpuc.ca.gov>

**Date:** Thursday, February 4, 2021 at 12:23 PM

**To:** Brenda Villanueva <bvillanueva@turn.org>

**Subject:** Incarcerated calling

Hello Brenda,

Thank you again for your participation yesterday. In regards to the incarcerated calling into the PPHs, the process is that the incarcerated will have to request to place the CPUC's phone number on their list of approved calls with the facility. The other issue is how to notice the incarcerated of the PPHs. Does each facility have their own advocate or ombudsperson for lack of a better word, or if we want to notice Public Defenders is there one singular contact for them?

Thanks,

Karo Serle

California Public Utilities Commission.

**Subject:** Re: Prep for PPHs  
**Date:** Friday, February 5, 2021 at 11:57:04 AM Pacific Standard Time  
**From:** Brenda Villanueva  
**To:** Jorge Rivera, Serle, Karo  
**CC:** Constance Slider Pierre, Christine Mailloux  
**Attachments:** Re- Incarcerated calling.eml, image001.png

Karo,

For context, our inquiry below relates to the questions you raised during our call on Thursday and to your email attached. Thanks again for reaching out.

Adding Christine Mailloux, for her awareness.

Thanks,  
Brenda

Brenda D. Villanueva  
Telecom and Regulatory Attorney, TURN

---

**From:** Jorge Rivera <jrivera@turn.org>  
**Date:** Friday, February 5, 2021 at 11:52 AM  
**To:** Serle, Karo <karo.serle@cpuc.ca.gov>  
**Cc:** Brenda Villanueva <bvillanueva@turn.org>, Constance Slider Pierre <cpierre@turn.org>  
**Subject:** Prep for PPHs

Hello Karo,

Thank you so much for making time to speak with us about preparations for the PPHs.

We are reaching out to all the stakeholders to get a better sense of their needs based on the topics and areas of concern we discussed a few days ago. We are asking for immediate responses for them to get the information to you as soon as possible.

What are your deadlines looking like with respect to receiving this information to help inform the planning of the PPHs?

Thank you.

In peace and solidarity,

--

**Jorge Rivera**

Organizing & Advocacy Campaign Director

Mailing Address:

TURN - The Utility Reform Network  
268 Bush Street, #3933  
San Francisco, CA 94104

Contact:

Main: (415) 929-8876  
[JRivera@TURN.org](mailto:JRivera@TURN.org)



IMPORTANT NOTICE: This e-mail (including attachments) is confidential and intended only for the addressee(s) named above. If you have received this e-mail in error, please delete it, notify the sender and do not retain, read, copy or disseminate this e-mail. This e-mail may not be provided to any other party without the sender's consent.



**Subject:** IDPJ\_ LAST CALL: Feedback for Public Participation Hearings at CPUC  
**Date:** Friday, February 12, 2021 at 8:58:45 AM Pacific Standard Time  
**From:** incarcerated---detention-phone-justice@googlegroups.com on behalf of Jorge Rivera  
**To:** incarcerated---detention-phone-justice@googlegroups.com  
**Attachments:** image001.png

Hello advocates and comrades!

Thank you to those of you who have already responded! I must submit responses to CPUC staff today and would really like your feedback on the following questions.

**Questions for advocates:**

***Please respond as best you can to the following questions:***

1. Are there any language access needs such as interpretation and/or translation for your folks who may share testimony at the Public Participation Hearings (PPHs) ?
  - a. If so, what languages?
2. We highlighted the need/request for anonymity for certain folks who may want to speak. This might be achieved by blocking the phone number and by not requiring participants to state their full name. Are there any additional items we should consider regarding anonymity and making folks feel safer to speak out?
3. We offered the possibility of persons who are incarcerated/detained who may want to call in and share testimony.
  - a. Is this something that is possible to coordinate and make happen?
  - b. If so, what are some access needs we should be thinking of and taking into consideration?
  - c. What is the best method to relay this possibility to offer brief testimony?
4. What types of accommodations are needed for people who are disabled that might wish to access this meeting?

-----  
**Update on Public Participation Hearings:**

- TURN attorneys and organizing staff had a brief conversation with CPUC staff regarding upcoming Public Participation Hearings (PPHs) which are tentatively scheduled for some time in March or April (as per the Scoping Memo).
- Public Participation Hearings are an opportunity for the public to speak on issues related to their experiences communicating with loved ones who are incarcerated and/or detained
  - TURN has recommended that the commission schedule a minimum of two Public Participation Hearings (PPH's)
    - one in the morning and one in the early evening
    - Possibly to be held on different days
    - To make sure they are not on Mondays or Fridays or right after/before

a holiday

**Some things to expect at a Public Participation Hearing:**

- PPHs can be accessed by internet/web or by calling in on a phone
- Speakers will be allotted 2-3 minutes to speak
- PPHs can last as long as necessary from 30 minutes to several hours
- Speakers are given opportunity to speak on a first come first serve basis

In peace and solidarity,

--

**Jorge Rivera**

Organizing & Advocacy Campaign Director

**Mailing Address:**

TURN - The Utility Reform Network  
268 Bush Street, #3933  
San Francisco, CA 94104

**Contact:**

Main: (415) 929-8876

[JRivera@TURN.org](mailto:JRivera@TURN.org)



IMPORTANT NOTICE: This e-mail (including attachments) is confidential and intended only for the addressee(s) named above. If you have received this e-mail in error, please delete it, notify the sender and do not retain, read, copy or disseminate this e-mail. This e-mail may not be provided to any other party without the sender's consent.

**Subject:** Incarcerated/Detained Communications \_ Considerations for PPHs  
**Date:** Friday, February 12, 2021 at 1:09:19 PM Pacific Standard Time  
**From:** Jorge Rivera  
**To:** Serle, Karo  
**CC:** Constance Slider Pierre, Brenda Villanueva, Christine Mailloux  
**Attachments:** image001.png

Hello Karo,

Thank you for the time in allowing us to gather responses from some of the stakeholders as it pertains to the planned PPH(s).

Based on the responses we would like following considerations to be taken into account:

1. **Retaliation** – all groups have expressed very serious concerns around retaliation for those incarcerated/detained as well as for the family members/loved ones of those incarcerated/detained.

Therefore, we would like to stress the need for:

a. **Anonymity**

- i. Blocking Phone Numbers of those calling in to participate in the hearing
- ii. Ensuring participant lists are not made available to facilities and/or service providers
- iii. Video tech – ensuring identifying information for participants on video are not made public or captured in some way that can be obtained by facility staff or providers
- iv. Not requiring participants to state their full name when sharing testimony; voluntarily shared would be preferred
- v. Not requiring participants to identify specific facilities from which they draw their experience; information can be voluntarily submitted

2. **Participation by incarcerated/detained individuals**

a. **Barriers to participation**

- i. Limited time to make phone calls – persons in facilities might be limited to a certain amount of time to participate
- ii. Need register a phone number in advance – most likely persons will need to place the phone number on a list to be allowed to make the call
- iii. Cost of making the calls – the cost of the call may be a barrier to persons inside the facilities
- iv. Privacy – some facilities may require a staff person to be present, which may dissuade participation

- v. Retaliation – directed to those participating and/or impacted the connections and communications with family/loved ones.

b. **Possible Remedies**

- i. Allowing third party submission of testimony from incarcerated/detained persons in writing or other medium such as video
- ii. Paying for the cost of calls through a stipend
- iii. Allotting specific window of time for those calling in from facilities

3. **General Participation**

- a. Language Access/Interpretation – made available in at least Spanish language

Thank you very much for your time and considerations.

In peace and solidarity,

--

**Jorge Rivera**

Organizing & Advocacy Campaign Director

Mailing Address:

TURN - The Utility Reform Network  
268 Bush Street, #3933  
San Francisco, CA 94104

Contact:

Main: (415) 929-8876  
[JRivera@TURN.org](mailto:JRivera@TURN.org)



IMPORTANT NOTICE: This e-mail (including attachments) is confidential and intended only for the addressee(s) named above. If you have received this e-mail in error, please delete it, notify the sender and do not retain, read, copy or disseminate this e-mail. This e-mail may not be provided to any other party without the sender's consent.

**Subject:** RE: Incarcerated/Detained Communications \_ Considerations for PPHs  
**Date:** Tuesday, February 16, 2021 at 3:54:27 PM Pacific Standard Time  
**From:** Serle, Karo  
**To:** Jorge Rivera  
**CC:** Constance Slider Pierre, Brenda Villanueva, Christine Mailloux  
**Attachments:** image002.png

Thank you all. This is good information for us.

We are also exploring the possibility of having the incarcerated send in written comments prior to the PPH.

Karo M. Serle  
Regulatory Analyst  
Communications Division  
California Public Utilities Commission

505 Van Ness Avenue  
San Francisco, CA 94102  
415-703-2185  
[ks1@cpuc.ca.gov](mailto:ks1@cpuc.ca.gov)



ALJ/CF1/smt 2/26/2021

**FILED**

02/26/21

11:57 AM

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

Order Instituting Rulemaking to  
Consider Regulating  
Telecommunications Services Used by  
Incarcerated People.

Rulemaking 20-10-002

**ADMINISTRATIVE LAW JUDGE'S RULING SETTING  
PUBLIC PARTICIPATION HEARINGS AND REQUIREMENTS  
TO PROVIDE ADVANCE NOTIFICATION**

**Summary**

This ruling sets two public participation hearings for April 28, 2021 at 1:30 p.m. and April 29, 2021 at 6:30 p.m. This ruling also requires Securus Technologies, LLC, Global Tel\*Link Corporation, Inmate Calling Solutions, LLC, Legacy Inmate Communications, Network Communications International Corporation, and Pay Tel Communications, Inc. to provide advance notification of the hearings via several communication channels.

**1. Public Participation Hearing  
Dates and Participation Information**

The proceeding schedule included in the Assigned Commissioner's Scoping Memorandum issued on January 12, 2021 included public participation hearings. This ruling provides notice for two public participation hearings as follows:

**Public participation hearing #1, April 28, 2021 at 1:30 pm**

<http://www.adminmonitor.com/ca/cpuc/hearing/2021042/>

Toll-Free phone number: 1-800-857-1917; code: 7218384#

Spanish language Toll-Free phone number: 800-857-1917;  
code: 8147204#

**Public participation hearing #2, April 29, 2021 at 6:30 pm**

<http://www.adminmonitor.com/ca/cpuc/hearing/2021042/>

Toll-Free phone number: 1-800-857-1917; code: 7218384#

Spanish language Toll-Free phone number: 800-857-1917;  
code: 8147204#

## **2. Requirements for Advance Notification of Public Participation Hearings Using Several Communication Channels**

The California Public Utilities Commission's (CPUC) Communication Division has identified the following service providers as providing communications services to adults and juveniles held in California correctional and detention centers: Securus Technologies, LLC, Global Tel\*Link Corporation, Inmate Calling Solutions, LLC, Legacy Inmate Communications, Network Communications International Corporation, and Pay Tel Communications, Inc. (collectively "Service Providers").

The following are the types of communication channels that the Service Providers use to provide notifications to incarcerated persons and/or to the family or friends of such persons:

- a. The Service Provider's website or webportal;
- b. Recorded voice messages recorded by the Service Provider that the detained or incarcerated person, and/or their family and friends, hears prior to making or receiving calls;
- c. E-mails, and/or texts sent by the Service Provider to the detained or incarcerated person and/or their family or friends; and,
- d. Online bills.

This ruling directs the Service Providers to use each of the four communication channels that they utilize to provide advance notification of the two public participation hearings to all incarcerated persons using the Service Provider's services in California, and their family and friends as registered for

billing or similar purposes with the Service Provider. The Service Providers shall provide this advance notification at least 30 days prior to the first public participation hearing and shall provide the advance notification throughout the 30-day period. For example, for website, webportal and/or online bills, the Service Providers shall prominently place the advance notice information on these channels 30 days prior to and continuously throughout the entire 30-day period. For e-mails, texts and/or recorded messages, the Service Providers shall initially send the advance notification information at least 30 days prior to the first public hearing and shall send the information an additional three times at regular intervals prior to the date of the first hearing. The Service Providers are free to use other means in addition to these four methods to provide advance notification of the public hearings.

The Service Providers shall include all information included in Attachment A in all written advance notifications (websites, webportals, e-mails, online bills). The Service Providers shall provide all information in Attachment B in all texts and recorded messages serving as notices of the public participation hearings. The Service Providers shall promptly prepare draft advance notifications for each of the four communication channels that they utilize and shall submit them to the CPUC's Public Advisor's Office for review at least 40 days prior to the first public hearing. The Public Advisor's Office may alter or require changes to the bill insert.

**IT IS RULED** that:

1. Public participation hearings are scheduled for:
  - a. April 28, 2021 at 1:30; and,
  - b. April 29, 2021 at 6:30 pm.



2. Securus Technologies, LLC, Global Tel\*Link Corporation, Inmate Calling Solutions, LLC, Legacy Inmate Communications, Network Communications International Corporation, and Pay Tel Communications, Inc. shall provide advance notification of the public participation hearings as set forth in this ruling.

Dated February 26, 2021 , at San Francisco, California.

/s/ CATHLEEN A FOGEL

Cathleen A. Fogel  
Administrative Law Judge

## **Attachment A**

### **Notification requirements for websites, webportals, emails and online bills**

#### **Notice of public hearings in Rulemaking 20-10-002 regarding the costs of calling from prisons and jails in California.**

##### **Dates:**

##### **Public hearing #1, April 28, 2021, at 1:30 p.m.**

<http://www.adminmonitor.com/ca/cpuc/hearing/20210428/>

Toll-Free phone number: 1-800-857-1917; code: 7218384#

Spanish language Toll-Free phone number: 800-857-1917; code: 8147204#

##### **Public hearing #2, April 29, 2021, at 6:30 p.m.**

<http://www.adminmonitor.com/ca/cpuc/hearing/20210429/>

Toll-Free phone number: 1-800-857-1917; code: 7218384#

Spanish language Toll-Free phone number: 800-857-1917; code: 8147204#

##### **Why am I receiving this notice?**

The California Public Utilities Commission (CPUC) wants to hear from you. Virtual public hearings have been scheduled to hear your comments, concerns and opinions regarding the costs of calling from prisons and jails in California. Your participation by providing comments can help to inform the CPUC on these issues.

You can watch a livestream of the hearings or participate via telephone. Incarcerated persons wishing to participate in the public hearing must typically obtain advance approval to do so by providing the hearing call-in number to the facility where they reside. You can also submit comments by mail or post them on the CPUC's public comment portal at any time before May 1, 2021.

##### **How does this process work?**

This rulemaking is considering regulating rates and fees for calling from prisons or jails. The rulemaking is assigned to a CPUC Administrative Law Judge who will consider proposals and evidence presented during formal processes. The Administrative Law Judge will issue a proposed decision. Any CPUC Commissioner may sponsor an alternate decision with a different outcome. The proposed decision, and any alternate decisions, will be discussed and voted upon by the CPUC Commissioners at a public CPUC Voting Meeting.

Parties involved in the rulemaking include the Public Advocates Office. The Public Advocates Office is an independent consumer advocate within the CPUC that represents customers to help them obtain the lowest possible rates consistent with reliable and safe service levels. Find out more here: **1-415-703-1584**, email [PublicAdvocatesOffice@cpuc.ca.gov](mailto:PublicAdvocatesOffice@cpuc.ca.gov) or visit **PublicAdvocates.cpuc.ca.gov**.

**Contact the CPUC:**

Please visit **[cpuc.ca.gov/R2010002Comments](https://cpuc.ca.gov/R2010002Comments)** to submit a public comment about this rulemaking to the CPUC. You may also mail written comments to the CPUC's Public Advisor's address below. For more information on participating in the public hearing, submitting comments, to request special assistance, or to request a non-English or Spanish language interpreter, please contact the CPUC's Public Advisor's Office at least five days prior to the hearings.

**CPUC Public Advisor's Office**

505 Van Ness Avenue

San Francisco, CA 94102

Phone: **1-866-849-8390** (toll-free) or **1-415-703-2074**

Email: [Public.Advisor@cpuc.ca.gov](mailto:Public.Advisor@cpuc.ca.gov)

Please reference **Rulemaking R.20-10-002** in any communications you have with the CPUC regarding this matter.

**(END OF ATTACHMENT A)**

**Attachment B**

**Notification requirements for texts and voice recordings:**

**Texts:**

California will hold hearings April 28 & 29 on the cost of calling from prisons and jails. Share your thoughts: [www.cpuc.ca.gov/PrisonCalls](http://www.cpuc.ca.gov/PrisonCalls)

**Voice recording:**

California CPUC is holding public hearings on the cost of calling from prisons and jails. Share your thoughts by phone on April 28 and 29 or send your comments by mail. Visit [www.cpuc.ca.gov/PrisonCalls](http://www.cpuc.ca.gov/PrisonCalls) for more information. To repeat this message [prompt].

**(END OF ATTACHMENT B)**

**Subject:** RE: R.20-10-002 Public Participation Hearings  
**Date:** Wednesday, March 10, 2021 at 4:43:15 PM Pacific Standard Time  
**From:** Serle, Karo  
**To:** Jorge Rivera, Lau, Amy, Van Wambeke, Eric  
**CC:** Constance Slider Pierre, Brenda Villanueva  
**Attachments:** image002.png

Good afternoon Jorge,

Yes, I could provide an update.

I am available Friday morning, and Monday, Tuesday or Wednesday.

Karo Serle  
California Public Utilities Commission.  
Communications Division.

---

**From:** Jorge Rivera <jrivera@turn.org>  
**Sent:** Wednesday, March 10, 2021 4:35 PM  
**To:** Serle, Karo <karo.serle@cpuc.ca.gov>; Lau, Amy <amy.lau@cpuc.ca.gov>; Van Wambeke, Eric <eric.vanwambeke@cpuc.ca.gov>  
**Cc:** Constance Slider Pierre <cpierre@turn.org>; Brenda Villanueva <bvillanueva@turn.org>  
**Subject:** R.20-10-002 Public Participation Hearings

Good Day,

I hope this email finds you all well and in good health.

First of all, we want to express gratitude for the efforts you all are making to be inclusive and thoughtful of the public participation in these CPUC proceedings and in preparation for the upcoming Public Participation Hearings.

I am writing today in hopes of coordinating a call with you all to investigate any progress or updates with regards to the various concerns brought up by the community partners and parties as it relates to the public participating at the hearings.

For review, some of the concerns involved the following:

1. For fear of retaliation, the protection of identities with persons calling in to give testimony
2. The notifications of possible participants for the hearings, including those incarcerated and detained
3. How to accommodate/address the needs for those who are currently incarcerated/detained to participate at the hearings

In order to be able to inform all our community partners, and to prepare for any accommodations, we hope we are able to schedule this meeting as soon as

possible to give us the appropriate time to do so.

Thank you in advance for your time and consideration.

In peace and solidarity,

--

**Jorge Rivera**

Organizing & Advocacy Campaign Director

Mailing Address:

TURN - The Utility Reform Network

268 Bush Street, #3933

San Francisco, CA 94104

Contact:

Main: (415) 929-8876

[JRivera@TURN.org](mailto:JRivera@TURN.org)



IMPORTANT NOTICE: This e-mail (including attachments) is confidential and intended only for the addressee(s) named above. If you have received this e-mail in error, please delete it, notify the sender and do not retain, read, copy or disseminate this e-mail. This e-mail may not be provided to any other party without the sender's consent.

**Subject:** RE: Rulemaking 20-10-002 Main Page Final

**Date:** Monday, March 22, 2021 at 3:09:19 PM Pacific Daylight Time

**From:** Serle, Karo

**To:** Jorge Rivera, Lau, Amy

**CC:** Brenda Villanueva, Constance Slider Pierre, Christine Mailloux

Good afternoon everyone,

While waiting on the ruling for the PPH, I wanted to let you know that the ALJ is allowing parties to comment at the end of the hearings.

Thank you,

Karo Serle  
California Public Utilities Commission.  
Communications Division.

---

**From:** Jorge Rivera <jrivera@turn.org>

**Sent:** Monday, March 22, 2021 9:39 AM

**To:** Serle, Karo <karo.serle@cpuc.ca.gov>; Lau, Amy <amy.lau@cpuc.ca.gov>

**Cc:** Brenda Villanueva <bvillanueva@turn.org>; Constance Slider Pierre <cpierre@turn.org>; Christine Mailloux <cmailloux@turn.org>

**Subject:** Re: Rulemaking 20-10-002 Main Page Final

Hello Karo and Amy,

I hope you both had a restful weekend.

As suggested, I am following up after about a week to see if there are any updates on the following inquiries:

1. Are there requirements for people that write in comments to have to give their name, and other identifying information?
  - a. Once collected, can TURN, or other parties, submit the written comments on behalf of the authors?
2. Are parties to the this proceeding going to be allowed to provide public comment?
3. What identifying information is "required" for submission of written comments via the email portal?
  - a. Will their identifying information including email address be protected somehow?
4. For live public comment during the PPH, can participants offer other identifying information for fear of retaliation, such as "John/Jane Doe #1" instead of their actual names.
  - a. How will participants identifying information be protected?

5. Can people submit voice/video testimony for the record?

Thank you so much Karo and Amy!

Hope to hear from you soon.

In peace and solidarity,

--

**Jorge Rivera**

Organizing & Advocacy Campaign Director

TURN - The Utility Reform Network

[JRivera@TURN.org](mailto:JRivera@TURN.org)

---

**From:** "Serle, Karo" <[karo.serle@cpuc.ca.gov](mailto:karo.serle@cpuc.ca.gov)>

**Date:** Monday, March 15, 2021 at 2:47 PM

**To:** Jorge Rivera <[jrivera@turn.org](mailto:jrivera@turn.org)>, "Lau, Amy" <[amy.lau@cpuc.ca.gov](mailto:amy.lau@cpuc.ca.gov)>

**Cc:** Brenda Villanueva <[bvillanueva@turn.org](mailto:bvillanueva@turn.org)>, Constance Pierre <[cpierre@turn.org](mailto:cpierre@turn.org)>, Christine Mailloux <[cmailloux@turn.org](mailto:cmailloux@turn.org)>

**Subject:** RE: Rulemaking 20-10-002 Main Page Final

Jorge,

I will find out.

Karo

---

**From:** Jorge Rivera <[jrivera@turn.org](mailto:jrivera@turn.org)>

**Sent:** Monday, March 15, 2021 2:40 PM

**To:** Serle, Karo <[karo.serle@cpuc.ca.gov](mailto:karo.serle@cpuc.ca.gov)>; Lau, Amy <[amy.lau@cpuc.ca.gov](mailto:amy.lau@cpuc.ca.gov)>

**Cc:** Brenda Villanueva <[bvillanueva@turn.org](mailto:bvillanueva@turn.org)>; Constance Slider Pierre <[cpierre@turn.org](mailto:cpierre@turn.org)>; Christine Mailloux <[cmailloux@turn.org](mailto:cmailloux@turn.org)>

**Subject:** Re: Rulemaking 20-10-002 Main Page Final

Hello Karo,

Thank you again for taking the time today and updating us on the progress you all have made to prepare for participation at the PPH.

After our call, we were reflecting on the May 1<sup>st</sup> deadline for submission of written comment to be a part of the PPH record. We were curious as to why this date was selected after the PPHs which seems to provide only one day after the PPH for comment submission.

In order to have public comment be considered in analysis and further decision making at this juncture in the proceedings, we would like to advocate for the extension of the PPH comment period to June 1<sup>st</sup>, at minimum. Especially as you



pointed out, there are many barriers to participation during this particular proceeding and in light of the pandemic.

Please add this into your investigations in addition to the questions highlighted during our meeting today.

Thank you for your time and consideration.

In peace and solidarity,

--

**Jorge Rivera**

Organizing & Advocacy Campaign Director

TURN - The Utility Reform Network

[JRivera@TURN.org](mailto:JRivera@TURN.org)

---

**From:** "Serle, Karo" <[karo.serle@cpuc.ca.gov](mailto:karo.serle@cpuc.ca.gov)>

**Date:** Monday, March 15, 2021 at 11:07 AM

**To:** Jorge Rivera <[jrivera@turn.org](mailto:jrivera@turn.org)>, Brenda Villanueva <[bvillanueva@turn.org](mailto:bvillanueva@turn.org)>, Constance Pierre <[cpierre@turn.org](mailto:cpierre@turn.org)>

**Subject:** Rulemaking 20-10-002 Main Page Final

Good morning,

Thank you for your time and comments this morning.  
Here is content of the notice to post on your web site.

Karo Serle

California Public Utilities Commission.



**FILED**  
03/23/21  
03:35 PM

ALJ/CF1/mef 3/23/2021

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

Order Instituting Rulemaking to  
Consider Regulating  
Telecommunications Services Used by  
Incarcerated People.

Rulemaking 20-10-002

**ADMINISTRATIVE LAW JUDGE'S RULING PROVIDING ADDITIONAL  
PUBLIC PARTICIPATION HEARING GUIDANCE**

**Summary**

This ruling corrects an error in my February 26, 2021 ruling and provides the agenda for the April 28, 2021 (1:30 p.m.) and April 29, 2021 (6:30 p.m.) public participation hearings. This ruling also clarifies steps the Commission is taking to ensure the anonymity and prioritization of incarcerated persons providing verbal comment during the public hearings and/or providing written comment on the Commission's public comment web portal.

**1. Correction to Attachment A  
of February 26, 2021 Ruling**

It has come to my attention that there was an error in Attachment A of my February 26, 2021 *Ruling Setting Public Participation Hearings and Requirements to Provide Advance Notification* (February Ruling). Attachment A to the February Ruling states, "You can also submit comments by mail or post them on the CPUC's public comment portal at any time before May 1, 2021."

This ruling corrects this error by striking the May 1, 2021 date. The public may submit comments on the public comment portal for this rulemaking at any time. The five Commissioners, industry staff, and I will receive and will consider

comments provided on the public comment portal throughout the entire period this proceeding is open.

This sentence in Attachment A of the February Ruling is therefore corrected as follows: “You can also submit comments by mail or post them on the CPUC’s public comment portal at any time the proceeding is open ~~before May 1, 2021.~~” The full corrected version of Attachment A of the February Ruling is appended to this ruling as Attachment 1.

## **2. Public Participation Hearing Agenda**

This ruling sets the agenda for the April 28 (1:30 pm) and April 29 (6:30 p.m.) public participation hearings as follows:

<b>Time</b>	<b>Event</b>
1:30 p.m./ 6:30 p.m.	Introduction by Commissioner Martha Guzman Aceves and Commissioner Genevieve Shiroma
1:35 p.m./ 6:35 p.m.	Staff presentation: current calling rates and interim proposal
1:40 p.m./ 6:40 p.m.	Instructions for public comment
1:40 p.m./ 6:40 p.m.	Public comment

## **3. Steps the Commission is Taking to Ensure the Anonymity and Prioritization of Incarcerated Persons Providing Public Comment**

This ruling also clarifies steps the Commission is taking to ensure the anonymity and prioritization of incarcerated persons providing verbal comment during the public hearings and/or providing written comment on the Commission’s public comment web portal.

### **3.1. Callers to Public Participation Hearings**

Commission staff have instructed the Commission’s phone line operator, during the April 28 and April 29 public hearings to:

- Move to the front of the queue all callers stating they are an incarcerated person;

- Not require callers to provide or record names or locations at any point during their call; and,
- Assign each caller a “port number,” which will be read in lieu of the caller’s name to signal his or her turn to speak.

### **3.2. Public Comment Portal**

As of March 26, 2021, the public comment portal for Rulemaking (R.) 20-10-002 will be modified to make following fields optional for individuals wishing to leave a comment on the portal:

- Last name
- First name
- Email
- City
- Zip Code

In addition, Commission staff will update the disclaimer language on the public comment portal for R.20-10-002 as follows:

- Please be aware that you are not required to provide your name, email, telephone number, location, or zip code to comment. If you do not want this information to be made public with your comment, or to be publicly accessible through a California Public Record Act Request, do not include it when you submit your comment. However, if you do choose to provide this information, your name, location, and zip code will appear with your comment and all the information would be provided in response to a Public Records Act request pursuant to Government Code Section 6250 et seq.

Individuals wishing to provide a written comment may use the portal to provide comments that are available publicly or to provide private comments that are made available only to Commission staff. Please visit **[cpuc.ca.gov/R2010002Comments](http://cpuc.ca.gov/R2010002Comments)** to submit a comment about this rulemaking.

Commission staff will flag and remove any comment deemed offensive or inappropriate.

### **3.3. Protecting Privacy**

I have directed Commission staff to make the changes summarized above to support the privacy of incarcerated persons and others wishing to provide public comment in this proceeding. Pursuant to California Government Code Section 6254 (c), records may be withheld if disclosure would constitute an invasion of personal privacy. Additionally, the Commission may prevent disclosure of records when the public interest in withholding those records clearly outweighs the public interest in disclosure. Moreover, the Bagley-Keene Open Meeting Act, Gov. Code Section 11124, states that “[n]o person shall be required, as a condition to attendance at a meeting of a state body, to register his or her name, to provide other information, to complete a questionnaire, or otherwise to fulfill any condition precedent to his or her attendance.”

Disclosing the phone numbers of participants in the April 28, 2021 and April 29, 2021 public participation hearings would constitute an invasion of privacy. The public interest in withholding the phone numbers of hearing participants outweighs the public interest in disclosure of these phone numbers.

Therefore, in addition to the above procedures for the April public hearing and the R.20-10-002 public comment portal, the Commission will treat the phone numbers of callers to the April 28, 2021 and April 29, 2021 public participation hearings as confidential due to privacy concerns if this information is later sought in a Public Records Act request.

Attachment A to the February Ruling is modified to reflect the Commission's modifications summarized herein along with several other minor corrections.

**IT IS SO RULED.**

Dated March 23, 2021, at San Francisco, California.

/s/ CATHLEEN A. FOGEL

Cathleen A. Fogel  
Administrative Law Judge

## ATTACHMENT 1

### Updated Attachment A to February 26, 2021 Ruling

#### Notification requirements for websites, web portals, emails, and online bills

**Notice of public participation hearings in Rulemaking 20-10-002 regarding the costs of calling from prisons and jails in California.**

#### **Dates:**

**Public participation hearing #1, April 28, 2021, at 1:30 p.m.**

[www.adminmonitor.com/ca/cpuc/hearing/20210428/](http://www.adminmonitor.com/ca/cpuc/hearing/20210428/)

Toll-free phone number: 1-800-857-1917; code: 7218384#

Spanish language toll-free phone number: 1-800-857-1917; code: 8147204#

**Public participation hearing #2, April 29, 2021, at 6:30 p.m.**

[www.adminmonitor.com/ca/cpuc/hearing/20210429/](http://www.adminmonitor.com/ca/cpuc/hearing/20210429/)

Toll-free phone number: 1-800-857-1917; code: 7218384#

Spanish language toll-free phone number: 1-800-857-1917; code: 8147204#

#### **Why am I receiving this notice?**

The California Public Utilities Commission (CPUC) wants to hear from you. Virtual public hearings have been scheduled to hear your comments, concerns, and opinions regarding the costs of calling from prisons and jails in California. Your participation by providing comments can help to inform the CPUC on these issues.

You can watch a livestream of the hearings or participate via telephone. Incarcerated persons wishing to participate in the public hearing must typically obtain advance approval to do so by providing the hearing call-in number to the facility where they reside. You can also submit comments by mail or post them on the CPUC's public comment portal at any time the proceeding is open. ~~before~~

~~May 1, 2021.~~

The CPUC has taken concrete steps to protect the anonymity of persons participating in the public hearings or posting comments on the CPUC's public comment portal and will work to prioritize calls from incarcerated persons during the hearings.

**How does this process work?**

This rulemaking is considering regulating ~~rates and fees~~ prices for calling from prisons or jails. The rulemaking is assigned to a CPUC Administrative Law Judge who will consider proposals and evidence presented during formal processes. The Administrative Law Judge will issue a proposed decision. Any CPUC Commissioner may sponsor an alternate decision with a different outcome. The proposed decision, and any alternate decisions, will be discussed and voted upon by the CPUC Commissioners at a public CPUC Voting Meeting.

Parties involved in the rulemaking include the Public Advocates Office. The Public Advocates Office is an independent consumer advocate within the CPUC that represents customers to help them obtain the lowest possible rates consistent with reliable and safe service levels. Find out more here: **1-415-703-1584**, email [PublicAdvocatesOffice@cpuc.ca.gov](mailto:PublicAdvocatesOffice@cpuc.ca.gov) or visit **PublicAdvocates.cpuc.ca.gov**.

**Contact the CPUC:**

Please visit **[cpuc.ca.gov/R2010002Comments](https://cpuc.ca.gov/R2010002Comments)** to submit a public comment about this rulemaking to the CPUC. You may also mail written comments to the CPUC's Public Advisor's address below. For more information on participating in the public hearing, submitting comments, to request special assistance, or to request a non-English or Spanish language interpreter, please contact the CPUC's Public Advisor's Office at least five days prior to the hearings.

**CPUC Public Advisor's Office**

505 Van Ness Avenue

San Francisco, CA 94102

Phone: **1-866-849-8390** (toll-free) or **1-415-703-2074**

Email: [Public.Advisor@cpuc.ca.gov](mailto:Public.Advisor@cpuc.ca.gov)

Please reference **Rulemaking R.20-10-002** in any communications you have with the CPUC regarding this matter.

**(END OF ATTACHMENT 1)**