

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



**FILED**

01/16/24

04:59 PM

A2303003

Application of Pacific Bell Telephone Company  
d/b/a AT&T California (U 1001 C) for Targeted  
Relief from Its Carrier of Last Resort Obligation  
and Certain Associated Tariff Obligations.

A.23-03-003  
(Filed March 3, 2023)

**SUMMARY OF PARTY POSITIONS FOR PACIFIC BELL TELEPHONE  
COMPANY D/B/A AT&T CALIFORNIA (U 1001 C) AND INTERVENORS**

Isabelle Salgado  
Nelsonya Causby  
AT&T Services, Inc.  
430 Bush Street, Sixth Floor  
San Francisco, CA 94108  
Tel: (415) 268-9493  
Email: nelsonya.causby@att.com

Maureen R. Jeffreys  
Arnold & Porter Kaye Scholer LLP  
601 Massachusetts Avenue, N.W.  
Washington, D.C. 20001  
Tel: (202) 942-6608  
Email: maureen.jeffreys@arnoldporter.com

C. Frederick Beckner III  
Sidley Austin LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
Tel: (202) 736-8874  
Email: rbeckner@sidley.com

*Attorneys for AT&T California*

January 16, 2024

In compliance with Section 4 and Ruling 2 of the Administrative Law Judge’s Ruling Noticing Public Participation Hearings and Additional Instructions for Applicant dated December 4, 2023 (“Ruling”), Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) (“AT&T California”) hereby files and serves the attached summary of the party positions in this proceeding. As required by the Ruling, AT&T California organized meet and confer meetings to discuss a one-page (double-sided) summary of the parties’ respective positions on the issues that are in the scope of this proceeding and provided notice to all parties of the meetings. Specifically, on January 9, 2024, AT&T California held an initial meet and confer, attended by California Public Advocates Office (“Cal Advocates”), Center for Accessible Technology (“CforAT”), and Tahoe Energy Ratepayers Group (“Tahoe ERG”). Subsequently, AT&T California held a second meet and confer on January 11, 2024, attended by Cal Advocates, The Utility Reform Network, CforAT, and Tahoe ERG (collectively with Rural County Representatives of California, “Intervenors”).

As directed in the Ruling, the attachment hereto includes the summaries from AT&T California and Intervenors.

*[Signature page follows]*

Dated: January 16, 2024

Respectfully submitted,

/s/ Nelsonya Causby

Isabelle Salgado  
Nelsonya Causby  
AT&T Services, Inc.  
430 Bush Street, Sixth Floor  
San Francisco, CA 94108  
Tel: (415) 268-9493  
Email: nelsonya.causby@att.com

Maureen R. Jeffreys  
Arnold & Porter Kaye Scholer LLP  
601 Massachusetts Avenue, N.W.  
Washington, D.C. 20001  
Tel: (202) 942-6608  
Email: maureen.jeffreys@arnoldporter.com

C. Frederick Beckner III  
Sidley Austin LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
Tel: (202) 736-8874  
Email: rbeckner@sidley.com

*Attorneys for AT&T California*

## **SUMMARY OF PARTY POSITIONS**

**A.23-03-003**

## **AT&T California's COLR Application Summary**

Beginning in the 1990s, there has been a transition from AT&T California's local telephone monopoly to today's voice service offerings provided by a variety of providers, wired and wireless. In 1996, to ensure that everyone could receive phone service during the transition, the Commission assigned AT&T California to be the carrier of last resort ("COLR") and required it to extend its copper network to any location in its service territory. Now, twenty-seven years later, after about 90 percent of AT&T California's former customers have left its plain old telephone service ("POTS") for voice services over mobile wireless or broadband connections, AT&T California has filed an application with the California Public Utilities Commission to end its COLR obligation and the associated state regulatory requirements in areas that are served by another voice provider.

The outdated COLR obligation effectively forces AT&T California to maintain its old copper-wire network to provide POTS throughout its service territory—in addition to the modern fiber and wireless broadband networks AT&T is working to extend across California.

The enormous benefits of transitioning from copper to broadband are beyond dispute. High-speed broadband enables online learning, remote work, economic advancement, civic engagement, Next Generation 911 capabilities, and access to government and other services. Fiber networks also are more resilient and use less energy than copper networks, benefiting public safety and the environment. In short, the faster this transition occurs, the better it will be for California.

Almost all (99.95 percent) consumers in AT&T California's service territory live in areas with at least one comparably or lower-priced broadband (for example, cable company) or mobile wireless voice alternatives to POTS (and 99.9 percent live in areas with at least two alternatives available). These customers with other options do not need AT&T California to be the COLR—especially since mobile wireless and broadband voice support 911 dialing, access for people with disabilities, and other critical functions as well as or better than POTS.

AT&T California will continue providing POTS services to customers for at least six months after approval of the Application. AT&T California will provide notice before any changes to customers' POTS services. For the few customers who currently lack an alternative, AT&T California will continue offering voice service on the same terms after approval of its application until an alternative arrives. Approval of the application thus would harm no one while bringing major benefits to California communities.

**A.23-03-003: JOINT CONSUMER ADVOCATES’\*  
PUBLIC PARTICIPATION HEARING HANDOUT**

**WHAT IS THIS PROCEEDING ABOUT?**

- At least one telephone company in your area is legally required to provide access to phone service to anyone in its service territory who requests it. This is known as the **Carrier of Last Resort (COLR)** obligation which ensures that everyone in California has access to reliable phone service. AT&T is the designated COLR in your area.
- AT&T is asking the CPUC to allow it to decide whether you can get AT&T telephone service, even if there is no other telephone provider in your area who is obligated to provide service.
- AT&T is asking the CPUC to change the rules and remove the safety net that guarantees access to affordable, quality phone service.

**HOW COULD THIS AFFECT ME AND MY COMMUNITY?**

If the CPUC grants AT&T’s request:

- No telephone provider would be obligated to provide you service in AT&T’s service area.
- AT&T could decide to not provide service to you as soon as six months after the application is granted.
- You could be required pay more for telephone service, receive lower quality service, buy phone service as part of an expensive “bundle,” or depend on cell service (which is not reliable or available in some areas).
- If you live in a Mountain Community you may not be able to maintain a landline as emergency backup for when there are outages due to cell phone network being damaged or destroyed by winter storms, wildfires, or other severe weather events.
- If you are a LifeLine customer or Deaf and Disabled Telecommunications (DDTP) customer, you may not be able to obtain those services. As a COLR, AT&T is legally required to provide low-cost telephone service to low-income households through the LifeLine program.
- If you have special medical equipment or other technology (such as a fire alarm or security system), it may no longer function.

**WHAT CAN I DO ABOUT IT?**

Join a Public Participation Hearing and share with CPUC leadership how you and your community rely on and benefit from your telephone service, especially if you subscribe to LifeLine or DDTP services.

\* The Public Advocates Office at the California Public Utilities Commission (Cal Advocates), The Utility Reform Network (TURN), the Center for Accessible Technology (CforAT), the Rural County Representatives of California (RCRC), and the Tahoe Energy Ratepayers Group (Tahoe ERG).