

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298**FILED**

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July 9, 2024

**Agenda ID #22748**  
**Ratesetting**

TO PARTIES OF RECORD IN APPLICATION 23-08-021:

This is the proposed decision of Administrative Law Judge Elizabeth Fox. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's August 22, 2024 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

The Commission may hold a Ratesetting Deliberative Meeting to consider this item in closed session in advance of the Business Meeting at which the item will be heard. In such event, notice of the Ratesetting Deliberative Meeting will appear in the Daily Calendar, which is posted on the Commission's website. If a Ratesetting Deliberative Meeting is scheduled, *ex parte* communications are prohibited pursuant to Rule 8.2(c)(4).

/s/ MICHELLE COOKE

Michelle Cooke

Chief Administrative Law Judge

MLC: hma

Attachment

Decision PROPOSED DECISION OF ALJ FOX (mailed 7/9/2024)

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

In the Matter of the Application of  
TIME CLOCK SOLUTIONS, LLC for a  
Certificate of Public Convenience and  
Necessity to Provide Resold and  
Limited Facilities-based Local Exchange  
and Interexchange Telecommunications  
Services within the State of California.

Application 23-08-021

**DECISION DENYING TIME CLOCK SOLUTIONS, LLC A CERTIFICATE OF  
PUBLIC CONVENIENCE AND NECESSITY TO PROVIDE LIMITED  
FACILITIES-BASED AND RESOLD COMPETITIVE LOCAL EXCHANGE  
SERVICES AND INTEREXCHANGE SERVICES**

**Summary**

Pursuant to Public Utilities Code Section 1001, the Commission denies Time Clock Solutions, LLC a Certificate of Public Convenience and Necessity (CPCN) to provide limited facilities-based and resold competitive local exchange and interexchange services in California. The Application does not meet certification requirements due to a history of compliance issues with its affiliate Velocity, A Managed Services Company, Inc. from 2012 to as recently as 2023. Therefore, the Commission finds that granting a new CPCN is not in the public interest.

Application 23-08-021 is closed.

## 1. Background

On August 22, 2023, Time Clock Solutions, LLC (Time Clock), a corporation authorized to do business in California, filed an application for a certificate of public convenience and necessity (CPCN) to provide limited facilities-based and resold competitive local exchange services and interexchange services in the service territory of Pacific Bell Telephone Company d/b/a AT&T California (AT&T California) and resold interexchange services throughout California.

Time Clock proposes to offer wholesale resold local exchange and interexchange services to commercial customers, primarily other telecom providers.<sup>1</sup> Time Clock's principal place of business is located at 7969 NW 2nd St., 489, Miami, Florida, 33141.

No party protested the Application. A prehearing conference was held on November 14, 2023, assigned Administrative Law Judge (ALJ) Elizabeth Fox issued a Ruling Requesting Additional Information on February 2, 2024, and Assigned Commissioner Karen Douglas issued a scoping ruling on February 8, 2024. Time Clock filed a Response on February 12, 2024 (February 12 Response). ALJ Fox issued a Second Ruling Requesting Additional Information on March 13, 2024 and Time Clock responded on March 21, 2024 (March 21 Response). A status conference was held on April 11, 2024.

## 2. Submission Date

This matter was submitted on April 11, 2024 at the conclusion of the status conference.

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<sup>1</sup> Response to Administrative Law Judge's Ruling Requesting Additional Information – Public Version, February 12, 2024 (February 12 Response) at 1.

### 3. Jurisdiction

The Commission has broad jurisdiction over “public utilities,” as defined in Public Utilities (Pub. Util.) Code Section 216. California’s constitution extends the Commission’s jurisdiction to companies engaged in “the transmission of telephone and telegraph messages,” which includes both public utility services and facilities.<sup>2</sup> The Commission classifies entities providing two-way voice communications service for compensation within California as “telephone corporations”<sup>3</sup> and regulates them as public utilities.<sup>4,5</sup>

As part of its regulatory authority over “telephone corporations,” the Commission authorizes certificates of public convenience and necessity to “telephone corporations” seeking to construct a “line, plant, or system, or any extension thereof” in California.<sup>6</sup> Pub. Util. Code Section 233 defines a “telephone line” to include “all conduits, ducts, poles, wires, cables, instruments, and appliances, and other real estate, fixtures, and personal property owned or controlled, operated, or managed in connection with or to facilitate communication by telephone, whether such communication is had with or without the use of transmission wires.” This includes services delivered over any technology, including but not limited to, traditional copper lines, coaxial cable, fiber optic cable, and mobile or fixed wireless radios.

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<sup>2</sup> See D.20-07-011, at 14-15, See Cal. Const., Art. XII, §§ 1-6; Pub. Util. Code § 701.

<sup>3</sup> Pub. Util. Code §§ 216, 233, 234; D.22-10-021 at 68.

<sup>4</sup> Pub. Util. Code § 216(a).

<sup>5</sup> Telephone corporations are required to file annual affiliate transaction reports and pay surcharges and user fees.

<sup>6</sup> Pub. Util. Code § 1001.

Time Clock proposed to offer voice as “wholesale resold local exchange and interexchange services to commercial customers, primarily other telecom providers.”<sup>7</sup> Time Clock qualifies to be telephone corporation and a public utility subject to the Commission’s jurisdiction. However, Time Clock will not be subject to the Commission’s jurisdiction because we deny Time Clock a CPCN as described herein.

#### **4. California Environmental Quality Act (CEQA)**

Pursuant to the CEQA<sup>8</sup> and Rule 2.4 of the Commission’s Rules of Practice and Procedure (Rules), the Commission acts as the designated lead agency to consider the environmental consequences of projects that are subject to the Commission’s approval to determine any potential environmental impacts, to avoid adverse effects, investigate alternatives, and ensure that any affected environmental impact is restored or otherwise mitigated to the fullest extent possible under CEQA. Since Time Clock states that it does not intend to construct any facilities other than equipment to be installed in existing buildings or structures, it can be seen with certainty that there is no possibility that granting this application would have an adverse impact upon the environment.

#### **5. Financial Qualifications**

To be granted a CPCN for authority to provide limited facilities-based and resold competitive local exchange services, and limited facilities-based and resold interexchange services, a new applicant must demonstrate that it has a minimum of \$100,000 cash or cash equivalent, reasonably liquid and readily

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<sup>7</sup> February 12 Response at 1.

<sup>8</sup> Public Resources Code § 21000 *et seq.*

available to meet the firm's start-up expenses.<sup>9</sup> In the application, Time Clock provided an "Unconditional and Continuing Guaranty" of its parent company for at least \$100,000.<sup>10</sup> Since Time Clock has provided documentation that it possesses a minimum of \$100,000 that is reasonably liquid and available, it demonstrated that it has sufficient funds to meet its start-up expenses and fulfilled this requirement.

In addition to demonstrating financial fitness, Time Clock must also demonstrate it has an amount equal to the deposit required by AT&T California, which would be available to Time Clock for one year following certification.<sup>11</sup> Time Clock proposed to initially interconnect with AT&T California. In addition to the \$100,000 discussed above, Time Clock has provided documentation that it has paid the \$22,000 deposit required by AT&T California.<sup>12</sup>

## **6. Technical Qualifications**

For the Commission to grant a CPCN for authority to provide competitive local exchange and/or interexchange service, the Applicant must make a reasonable showing of managerial and technical expertise in telecommunications or a related business.<sup>13</sup> In addition, the Applicant is required to certify that, to the best of Time Clock's knowledge, neither Time Clock, nor any affiliate, officer, director, partner, nor owner of more than 10 percent of Time Clock, or any

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<sup>9</sup> The financial requirement for Competitive Local Exchange Carriers (CLEC) is contained in D.13-05-035 and D.95-12-056, Appendix C. The financial requirement for Non-Dominant Interexchange Carriers (NDIEC) is contained in D.14-11-004.

<sup>10</sup> February 12 Response at 1.

<sup>11</sup> The financial requirement for Competitive Local Exchange Carriers (CLEC) is contained in D.13-05-035 and D.95-12-056, Appendix C. The financial requirement for Non-Dominant Interexchange Carriers (NDIEC) is contained in D.14-11-004.

<sup>12</sup> March 21 Response at 1.

<sup>13</sup> D.13-05-035; D.95-12-056 at Appendix C, Rule 4.A.

person acting in such capacity whether or not formally appointed, is being, or has been investigated by the Federal Communications Commission or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

Time Clock supplied biographical information for three management officers in Exhibit 5 of A.23-08-021. Time Clock also responded to certification requirements in Exhibit 6, as described below.

All of the officers of Time Clock are currently employed at Velocity, A Managed Services Company, Inc. (Velocity), which has a history of noncompliance with Commission orders and requirements, rendering Time Clock unable to meet the Commission's certification requirements for new CPCNs. Exhibit 5 provides biographical information for three officers of Time Clock: Vance Witt, Gregory Kiley, and William "Chip" Werner.<sup>14</sup> The biographies provided show that each of these officers currently is employed by Velocity.<sup>15</sup> Additional documentation in the application indicates that Gregory Kiley is 100 percent owner of both Time Clock and Velocity via 100 percent ownership in Platinum Holding Investments, LLC.<sup>16</sup> Time Clock confirmed this ownership structure at the April 11, 2024 status conference. Therefore, there is a complete overlap of Time Clock officers with Velocity personnel. The two companies are both wholly owned by Platinum Holding Investments, LLC, which is wholly owned by Gregory Kiley.

Applicants for CPCNs are required by Decision (D.) 13-05-035, ordering paragraph (OP) 14 to certify that no affiliate, officer, director, partner, or owner

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<sup>14</sup> Application at 20-26 (Exhibit 5).

<sup>15</sup> Velocity was formerly known as Velocity, The Greatest Phone Company Ever, Inc.

<sup>16</sup> Application at 96 ("Post-Transaction" Chart).

of more than 10 percent of the Applicant, or anyone acting in a management capacity for the Applicant has:

- a) held one of these positions with a company that filed for bankruptcy;
- b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others;
- c) been convicted of a felony;
- d) been (to his/her knowledge) the subject of a criminal referral by judge or public agency;
- e) had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction;
- f) personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of [Sections] 17000 *et seq.*, [Sections] 17200 *et seq.*, or [Sections] 17500 *et seq.* of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; or
- g) been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries; or
- h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.<sup>17</sup>

Time Clock is unable to meet the certification requirements for items (b), (e), (f), (g) and (h) due to Velocity's conduct. First, Time Clock does not meet

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<sup>17</sup> These certifications are required by D.13-05-035, OP 14.



certification requirement (e) because the Commission revoked Velocity's CPCN under the utility ID U-7031-C in 2012 for failing to comply with D.10-09-017.<sup>18</sup>

Second, Time Clock does not meet the certification requirement for (b), (g), and (h) because Velocity entered into a settlement agreement in 2017 with the Commission's Safety and Enforcement Division for failing to disclose Velocity's 2012 CPCN revocation when applying for a new CPCN to operate as a provider of two-way telecommunications services in 2017. As part of a settlement agreement to receive a new CPCN,<sup>19</sup> Velocity admitted that it violated the Commission's Rule 1.1 by providing staff inconsistent responses to staff data requests regarding the insolvency of Kytel International Group, a company started by Mr. Kiley,<sup>20</sup> and for continuing to operate after the Commission revoked Velocity's license. Velocity paid a \$70,000 penalty.

Time Clock also fails to meet certification requirements for (g) and (h) because Velocity received sanctions in several jurisdictions for not properly disclosing the January 1, 2020 transfer of Alliance Global Networks, LLC (Alliance) to Velocity. In California, Velocity paid a \$1,000 penalty in 2021 for failure to file an advice letter to obtain Commission approval prior to the transfer of ownership of Alliance.<sup>21</sup> On the federal level, Alliance was issued a Notice of

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<sup>18</sup> Resolution T-17359, April 20, 2012. Velocity (U-7031-C) failed to comply with Commission requirements related to performance bond and user fee obligations.

<sup>19</sup> D.16-08-009 granted Velocity operating authority and assigned it a new utility ID, U-7307-C. In 2014, Velocity, The Greatest Phone Company Ever, Inc. submitted an informal registration as an Interconnected VoIP to comply with surcharge reporting and remittance requirement under Pub. Util. Code Section 285. Velocity was issued a separate utility ID number, U-1257-C, for its Interconnected VoIP service. Currently, Velocity maintains two active utility IDs with the Commission. (Application at Attachment A-1).

<sup>20</sup> Application at Attachment A-1.

<sup>21</sup> Citation No. CD-2021-09-001.

Apparent Liability of Forfeiture in 2021 by the Federal Communications Commission (FCC) for not seeking timely approval of the transaction; the FCC assessed a \$16,000 penalty in March 2022.<sup>22</sup> In Minnesota, Velocity reached a \$1,000 settlement with the Minnesota Public Utilities Commission for the transfer of ownership of Alliance to Velocity prior to its approval.<sup>23</sup>

Most recently, and since Time Clock filed the instant application, Velocity received a citation of \$1,000 from the Commission for violation of Pub. Util. Code Sections 702, 2101, 2107 and 2108, related to not filing its Annual Affiliate Transaction Report by the May 1, 2023 deadline.<sup>24</sup> The Commission increased the \$1,000 penalty to \$1,200 after Velocity failed to submit the required filing after the first notice of its violation.<sup>25</sup> Velocity ultimately resolved the citation by filing the Annual Affiliate Transaction Report and paying the penalty on November 27, 2023.<sup>26</sup>

The Commission adopted the certification requirements in D.13-05-035 to ensure that the Commission's grant of a CPCN is in the public interest. Time Clock will not meet the technical requirements for a CPCN if it fails to meet certification requirements unless the Commission makes a finding otherwise.

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<sup>22</sup> Application at Attachment A-2, FCC DA 22-216, Notice of Apparent Liability for Forfeiture, March 3, 2022.

<sup>23</sup> Application at Attachment A-3, Min. Pub. Util. Com., Docket No. P-6867, 5986, 6709/PA-21-231, May 25, 2021.

<sup>24</sup> First Notice Re: Velocity, A Managed Services Company, Inc. (U-7307-C), Citation No. CD-2023-07-027, July 11, 2023.

<sup>25</sup> Second Notice Re: Velocity, A Managed Services Company, Inc. (U-7307-C), Citation No. CD-2023-07-027, September 28, 2023.

<sup>26</sup> Velocity paid \$1,220 in total penalties for this citation: \$1,000 after receiving the first notice of its citation and \$220 when submitting the Annual Affiliate Transaction Report nearly one month after the second due date of October 20, 2023.

Based on our review of Velocity's continuous record of noncompliance at the Commission from 2012 to as recently as 2023, and in other jurisdictions as recently as March 2022,<sup>27</sup> the Commission does not find any reasons why the officers of Time Clock should be granted a license for another entity operating as a public utility in California.

## **7. Tariffs**

Applicant requested detariffed status, for which it could be exempt from the requirement to file tariffs provided that Applicant complies with the consumer protection rules identified in D.98-08-031. Applicant states that it plans to offer services on a non-discriminatory basis.

Detariffed status is not available for carriers providing residential local exchange service. Based on the application, the Applicant does not intend to provide residential local exchange service. While Time Clock would otherwise qualify for detariffed status, as we do not grant detariffed status to Time Clock as we deny its request for a CPCN.

## **8. Map of Service Territory**

To be granted a CPCN for authority to provide competitive local exchange service, an applicant must provide a map of the service territories it proposes to serve.<sup>28</sup> In its application Exhibit 3, Time Clock provided a map of the location of its proposed service territory, in compliance with this requirement.

## **9. Expected Customer Base**

Time Clock Solutions, LLC has not provided its estimated customer base for the first and fifth years of operation. Therefore, Time Clock Solutions, LLC has not complied with this requirement.

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<sup>27</sup> FCC DA 22-216.

<sup>28</sup> D.95-12-056 at Appendix C (Rule 4.F).

## 10. Environmental and Social Justice (ESJ) Action Plan

On February 2, 2024, the ALJ issued a ruling requiring that Time Clock explain how the authority sought is consistent with the Commission's ESJ Action plan. On February 12, 2024, Time Clock filed a response to ALJ Inquiry and explained that it would "remain mindful of the current regulations of the [Commission] and its desire to further inclusion, diversity, and environmental concerns as set forth in the ESJ [*sic*]." <sup>29</sup> Based on the information provided in the Application and February 12 Response, this decision finds that approval of the application would not be inconsistent with the Commission's ESJ goals.

## 11. Conclusion

While Time Clock met several requirements for a CPCN, Time Clock's application does not make a reasonable showing of managerial and technical expertise as required in D.13-05-035 and Time Clock failed to provide estimated customers for the first and fifth years. Given Time Clock's officers are the same as Velocity's and given Velocity's history of noncompliance with requirements by this Commission as well as other state and federal requirements, we find that granting a CPCN to Time Clock is not in the public interest. This decision does not prevent the officers of Time Clock from operating in California as Velocity. However, through this decision, we decline to extend operations of the same officers through a new public utility pursuant to Pub. Util. Code Section 216 due to concerns regarding Velocity's history of noncompliance.

Accordingly, the Commission denies Time Clock's application for a CPCN to provide limited facilities-based and resold competitive local exchange services in the service territory of AT&T California and interexchange services in

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<sup>29</sup> February 12 Response at 4.

California without prejudice. Any affiliate, officer, director, partner, or owner of more than 10 percent of the Velocity, or anyone acting in a management capacity for the Velocity, must disclose Application 23-08-021 and this Decision in any subsequent application requesting a CPCN for authority to provide telecommunications services.

All assigned Commissioner and Administrative Law Judge rulings are affirmed.

#### **12. Request to File Under Seal**

Pursuant to Rule 11.4, Time Clock has filed motions for leave to file Exhibit 4 to the application and Exhibit B of its February 12, 2024 response as confidential materials under seal. Time Clock represents that the information filed under seal is highly proprietary and commercially sensitive. The Commission granted similar requests in the past and does so here.

#### **13. Summary of Public Comments**

Rule 1.18 allows any member of the public to submit written comment in any Commission proceeding using the “Public Comment” tab of the online Docket Card for that proceeding on the Commission’s website. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding. There are no relevant public comments on the Docket Card for this proceeding.

#### **14. Comments on Proposed Decision**

The proposed decision of ALJ Elizabeth Fox in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission’s Rules of Practice and Procedure. Comments were filed on \_\_\_\_\_. Reply comments were filed on \_\_\_\_\_ by \_\_\_\_\_.

**15. Assignment of Proceeding**

Karen Douglas is the assigned Commissioner and Elizabeth Fox is the assigned ALJ in this proceeding.

**Findings of Fact**

1. Time Clock Solutions, LLC (Time Clock) is not a telephone corporation and a public utility as defined in Pub. Util. Code Sections 234(a) and 216(a).
2. Time Clock will not construct any facilities other than equipment to be installed in existing buildings or structures.
3. Time Clock has a minimum of \$100,000 of cash or cash equivalent that is reasonably liquid and readily available to meet its start-up expenses.
4. Time Clock has sufficient additional cash or cash equivalent to cover deposits that may be required by other telephone corporations in order to provide the proposed service.
5. All officers of Time Clock are employed by Velocity, a Managed Services Company, which received a Certificate of Public Convenience and Necessity (CPCN) in Decision (D.)16-08-009.
6. The Commission revoked Velocity's CPCN in 2012 for failing to comply with D.10-09-017.
7. Velocity entered into a settlement agreement in 2017 with the Commission's Safety and Enforcement Division for failing to disclose the 2012 CPCN revocation when applying for a new CPCN to operate as a provider of two-way telecommunications services in 2017.
8. As part of a settlement agreement to receive a new CPCN, Velocity admitted that it violated the Commission's Rule 1.1 by providing staff inconsistent responses to staff data requests regarding the insolvency of a

company started by Mr. Kiley, and for continuing to operate after the Commission revoked Velocity's license.

9. Velocity paid a \$70,000 penalty for violating Rule 1.1.

10. In California, Velocity paid a \$1,000 penalty in 2021 for failure to file an advice letter to obtain Commission approval prior to the transfer of ownership of Alliance.

11. With the FCC, Alliance was issued a Notice of Apparent Liability of Forfeiture and held liable for \$16,000 in 2021 for not seeking timely approval of its sale to Velocity.

12. In Minnesota, Velocity reached a \$1,000 settlement with the Minnesota Public Utilities Commission for the transfer of ownership of Alliance to Velocity prior to Commission approval.

13. Velocity received a citation of \$1,000 from the Commission for violation of Pub. Util. Code Sections 702, 2101, 2107 and 2108, related to not filing its Annual Affiliate Transaction Report by the May 1, 2023 deadline.

14. The Commission increased the \$1,000 citation penalty to \$1,200 after Velocity failed to submit the required filing after the first notice of its violation.

15. Velocity ultimately paid a \$1,220 penalty to the Commission on November 27, 2023 for not timely filing an Annual Affiliate Transaction Report due May 1, 2023.

16. Officers of Time Clock have: (a) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (b) had a telecommunications license or operating authority denied, suspended, revoked, or limited in California; (c) held positions with a company that has entered into settlement of claims involving dishonesty, failure to disclose, or

misrepresentations to consumers or others; (d) been found to have violated Rule 1.1 of the Commission; and (e) entered into any settlement agreements and made monetary forfeitures in resolution of action by the Commission and other regulatory bodies.

17. A new CPCN is not in the public interest.

18. Time Clock requested exemption from tariffing requirements.

19. Time Clock does not propose to provide basic service to customers.

20. Time Clock provided a map of the location of its proposed service territory.

21. Time Clock did not provide an estimate of its customer base for the first and fifth year of operation.

22. Time Clock provided information regarding how the authority sought is not inconsistent with the Commission's ESJ Action Plan.

23. Pursuant to Rule 11.4, Time Clock filed motions for leave to file confidential materials under seal, including Exhibit 4 to the application and Exhibit B of its February 12, 2024 response.

### **Conclusions of Law**

1. Time Clock's request for a CPCN to provide limited facilities-based and resold competitive local exchange services in the service territory of AT&T California or limited facilities-based and resold interexchange services in California should be denied without prejudice.

2. Any affiliate, officer, director, partner, or owner of more than 10 percent of the Velocity, or anyone acting in a management capacity for the Velocity, should disclose Application 23-08-021 and this Decision in any subsequent application requesting a CPCN for authority to provide telecommunications services.



3. Time Clock failed to meet certification requirements and has not made a reasonable showing of managerial and technical expertise as required in D.13-05-035.

4. Time Clock's motions to file under seal its Exhibit 4 to the application and Exhibit B of its February 12, 2024 response should be granted for three years.

5. All assigned Commissioner and Administrative Law Judge rulings should be affirmed.

6. This proceeding should be closed.

**O R D E R**

**IT IS ORDERED** that:

1. Time Clock Solutions, LLC's request for a Certificate of Public Convenience and Necessity to provide limited facilities based and resold competitive local exchange and interexchange services in California is denied without prejudice.

2. Any affiliate, officer, director, partner, or owner of more than 10 percent of the Velocity, A Managed Services Company, Inc. (Velocity) or anyone acting in a management capacity for the Velocity, must disclose Application 23-08-021 and this Decision in any subsequent application requesting a Certificate of Public Convenience and Necessity for authority to provide telecommunications services.

3. Time Clock Solutions, LLC's motions to file under seal Exhibit 4 to its application and Exhibit B of its February 12, 2024 response is granted for a period of three years after the date of this decision. During this three-year period, this information shall not be publicly disclosed except on further Commission order or Administrative Law Judge ruling. If Time Clock Solutions, LLC believes that it is necessary for this information to remain under seal for longer than three years,

Time Clock Solutions, LLC may file a new motion showing good cause for extending this order by no later than 30 days before the expiration of this order.

4. All assigned Commissioner and Administrative Law Judge rulings are affirmed.

5. Application 23-08-021 is closed.

This decision is effective today.

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