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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Proceeding to Consider Changes to the Commission's Carrier of Last Resort Rules.	R. 24-06-012

OPENING COMMENTS OF

CALAVERAS TELEPHONE COMPANY (U 1004 C)
CAL-ORE TELEPHONE CO. (U 1006 C)
DUCOR TELEPHONE COMPANY (U 1007 C)
FORESTHILL TELEPHONE CO. (U 1009 C)
KERMAN TELEPHONE CO. (U 1012 C)
PINNACLES TELEPHONE CO. (U 1013 C)
THE PONDEROSA TELEPHONE CO. (U 1014 C)
SIERRA TELEPHONE COMPANY, INC. (U 1016 C)
THE SISKIYOU TELEPHONE COMPANY (U 1017 C)
VOLCANO TELEPHONE COMPANY (U 1019 C)
("INDEPENDENT SMALL LECS")

ON ORDER INSTITUTING RULEMAKING PROCEEDING TO CONSIDER CHANGES TO THE COMMISSION'S CARRIER OF LAST RESORT RULES

Chan Q. Vu
BRB Law LLP
492 9th Street, Suite 220
Oakland, CA 94607
Phone: (510) 955-1087
Email: qc@brblawgroup.com

Attorney for the Independent Small LECs

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I. INTRODUCTION.

In accordance with Rule 6.2 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules"), and consistent with the procedural schedule outlined in the Order Instituting Rulemaking ("OIR") that initiated this proceeding, Calaveras Telephone Company (U 1004 C), Cal-Ore Telephone Co. (U 1006 C), Ducor Telephone Company (U 1007 C), Foresthill Telephone Co. (U 1009 C), Kerman Telephone Co. (U 1012 C), Pinnacles Telephone Co. (U 1013 C), The Ponderosa Telephone Co. (U 1014 C), Sierra Telephone Company, Inc. (U 1016 C), The Siskiyou Telephone Company (U 1017 C), and Volcano Telephone Company (U 1019 C), (collectively, the "Independent Small LECs") provide these opening comments on the OIR. The Independent Small LECs hereby address the overall subject of the OIR regarding the future of Carrier of Last Resort ("COLR") obligations, and the companies offer their responses to the specific questions presented therein.

This proceeding has very limited relevance to the Independent Small LECs, and the Commission should take appropriate steps to limit the burdens of this proceeding on the Independent Small LECs. Although the OIR does not directly recognize it, this proceeding stems in significant part from the disposition of AT&T's application seeking to "withdraw as a carrier of last resort," which the Commission dismissed while committing to "initiate an Order Instituting Rulemaking to consider whether to revise its COLR rules."[1] While AT&T and other larger providers may be focused on obtaining "COLR relief," and there may be justification for lifting COLR requirements in other service territories, the Independent Small LECs have no plans to pursue such proposals. Indeed, the Independent Small LECs all participate in the California High Cost Fund A ("CHCF-A") program, which mandates the retention of COLR status as a prerequisite to receiving CHCF-A support.[2] The Independent Small LECs are small, rural telephone companies with limited resources, and they are subject to Commission-imposed caps on cost recovery,[3] so the Commission should not subject the Independent Small LECs to a wide-ranging inquiry that does not concern the Independent Small LECs or their ratepayers.

The Independent Small LECs do have thoughtful comments on how to update the definition of "basic service," which are presented herein. Aside from this issue, the Independent

[1] *See* A.23-03-003; D.24-06-024 at 3.
[2] Pub. Util. Code §§ 275.6(d)(3), 275.6(b)(1).
[3] *See* D.21-06-004 at 43 (OPs 6-7).

Small LECs do not have a current interest in the issues being addressed here, and the Commission should permit the Independent Small LECs to modulate their participation to reflect their fundamental differences with larger providers who may be pursuing broader changes to the COLR rules.

II. PARTICIPANTS IN THE CHCF-A PROGRAM MUST RETAIN COLR STATUS, SO THE QUESTIONS IN THE OIR HAVE LIMITED RELEVANCE TO THE INDEPENDENT SMALL LECS.

Each of the Independent Small LECs are COLRs, and each is likely to remain a COLR for the foreseeable future. Public Utilities Code Section 275.6(d)(3) requires that a CHCF-A participant "[b]e a carrier of last resort in their service territory" and Section 275.6(b)(1) confirms that a COLR must "fulfill all reasonable requests for service within its service territory."[4] The Independent Small LECs have performed these functions in their rural service territories for more than a century, and, as long as they can continue to access reasonable high-cost support, the Independent Small LECs intend to continue operating as COLRs for the benefit of their communities and rural ratepayers. Based on their unique regulatory structure and community-focused operations, the Independent Small LECs have different areas of focus than other carriers, and the Commission should recognize those differences in how it manages this proceeding.

III. THE DEFINITION OF "BASIC SERVICE" IS OUTDATED AND SHOULD BE MODERNIZED.

The one issue amongst the questions in the OIR that is directly meaningful to the Independent Small LECs is the definition of basic service. As the OIR recognizes, it has now been nearly 12 years since the Commission examined the definition of basic service,[5] and, in most respects, the definition stems back to 1996, in the early days of local competition.[6] Given the many changes in the industry and evolutions in technology in the intervening 28 years, the Commission does not need to take such a prescriptive approach or rely on rigid definitions in describing "basic service." The definition can be simplified and streamlined in significant ways, and the Independent Small LECs have offered a proposal for how to make these adjustments in Appendix A to these comments. The justifications for the changes are set forth in further detail

[4] Pub. Util. Code §§ 275.6(d)(3), 275.6(b)(1).
[5] *See OIR* at 2 (citing D.12-12-038).
[6] D.96-10-066 at 109.

in Section V(g), below. As explained therein, the Commission should eliminate Elements 3, 8, and 9 from the "basic service" definition, and it should adopt other significant revisions to the remaining elements, including the "billing provisions" in Element 4. "Basic service" remains an important concept where COLR designations apply, but the current definition is overly elaborate and contains unnecessary elements that can be streamlined or removed.

IV. THE COMMISSION SHOULD MAINTAIN A FOCUSED SCOPE FOR THIS PROCEEDING TO AVOID EXPANSIVE AND IRRELEVANT INQUIRIES THAT GENERATE UNNECESSARY AND UNRECOVERABLE REGULATORY COSTS FOR THE INDEPENDENT SMALL LECS.

It will be important for the Commission to establish a focused scope for this proceeding that is targeted to address the ongoing need for COLRs, the procedure for withdrawing from COLR status, and the definition of basic service. As noted above, only the "basic service" questions are pertinent to the Independent Small LECs at this time. In the final Scoping Memo, the Commission should affirm that the specific questions surrounding COLR designations and basic service—which are voice constructs—are the focus on this proceeding.

Based on aggressive discovery tactics and expansive data requests from the Public Advocates Office ("Cal Advocates") in the early stages of this proceeding, the Independent Small LECs are concerned that this proceeding will be used as a generic telecommunications industry reexamination docket, which would be contrary to the Commission's stated intent in adopting specific questions in the OIR that relate to COLR status and basic service. Although these are *voice-focused* concepts, Cal Advocates has issued wide-ranging discovery seeking broadband subscription information that has no apparent relevance to the proceeding. Cal Advocates has also sought discovery regarding tangential and irrelevant topics such as middle-mile access, low-income broadband plans, future infrastructure deployment plans, and "lead-clad copper wires." The Commission should take proactive steps to avoid this proceeding becoming a boundless inquiry with expensive and unnecessary discovery obligations. These concerns are particularly important as to the Independent Small LECs given that the Commission has imposed rigid expense caps on their ability to recover corporate operations expense, including the regulatory, legal, and consulting costs that are imposed by participation in a proceeding such as this one.[7] Again, these costs cannot be justified given the very limited relevance of this

[7] *See* D.21-06-004 at 43 (OPs 6-7).

proceeding to the Independent Small LECs. The Independent Small LECs reserve the right to pursue specific remedies and proactive restrictions on their participation as appropriate to limit the unjustified costs of this process.

V. THIS PROCEEDING SHOULD BE RECATEGORIZED AS "QUASI-LEGISLATIVE."

In accordance with Rule 6.2, comments on an OIR are the appropriate place to "state any objections" to the "category" of the proceeding,[8] and the Independent Small LECs hereby object to the categorization of this proceeding as "ratesetting." Under the Commission's rules, "ratesetting" proceedings are those "in which the Commission sets or investigates rates for a specifically named utility" or "establishes a mechanism that in turn sets the rates for a specifically named utility."[9] By contrast, "quasi-legislative proceedings" are those which "establish policy or rules (including generic ratemaking policy or rules) affecting a class of regulated utilities," and the Commission's rules confirm that proceedings are appropriately classified as "quasi-legislative" even "if those proceedings have an incidental effect on ratepayer costs."[10] Based on these definitions, there is no doubt that this proceeding involves a quasi-legislative exercise.

The OIR seeks to justify a "ratesetting" classification on the grounds that the issues in this proceeding "may require changes to basic service requirements or impact the collection and expenditure of ratepayer monies, including the California High Cost Fund-B."[11] This proffered rationalization is misplaced, as these are only "incidental" ratemaking considerations that do not undermine a "quasi-legislative" designation.[12] The OIR's premise is also contradicted by Commission precedent, as numerous rulemakings impacting public policy funds have been—and currently are—classified as quasi-lesgislative. These include the recently-concluded CHCF-A rulemaking, R.11-11-007,[13] which involved extensive revisions to the manner in which the Commission applies rate-of-return regulation for "small independent telephone corporations" and significant changes to the operation of the CHCF-A.[14] Similarly, each of the previous

[8] Rule 6.2.
[9] Rule 1.3(g); *see also* Pub. Util. Code § 1701.1(c).
[10] Rule 1.3(f); *see also* Pub. Util. Code § 1701.1(d)(1).
[11] *OIR* at 6.
[12] *See* Rule 1.3(f).
[13] R.11-11-007, *OIR* at 35.
[14] *See* D.14-12-084, D.21-04-005, D.21-06-004; *see also* Pub. Util. Code § 275.6(b)(6).

proceedings to review the CHCF-B were "quasi-legislative,"[15] as are the ongoing rulemakings to evaluate the California LifeLine program and the Deaf and Disabled Telecommunications Program ("DDTP").[16]

Where the Commission is acting in a legislative capacity, such as where it modifies important industrywide rules, it is important that the inquiry be classified as "quasi-legislative" to facilitate the free flow of pertinent information. The lack of restrictions on ex parte communications that accompany a quasi-legislative classification are likewise appropriate where the Commission is performing legislative functions. The Commission should follow its own precedent in similar proceedings and adjust this proceeding to "quasi-legislative."

VI. RESPONSES TO SPECIFIC QUESTIONS.

The Independent Small LECs hereby offer these responses to the specific questions posed in the OIR, which the OIR suggests should constitute "the Preliminary Scoping of Issues." Because the Independent Small LECs are required to maintain their COLR status to preserve access to CHCF-A support, most of the questions in the OIR are inapplicable or purely academic as applied to the Independent Small LECs. Therefore, the Independent Small LECs' focus in this proceeding will be on modernizing and streamlining the definition of basic service, which is "Issue h" in the proposed preliminary scope. The Independent Small LECs offer their views on the other subjects to the extent that they have positions, but questions about "COLR relief" and "alternative COLRs" in Independent Small LEC territories are not fruitful or meaningful topics given the companies' continued imperative to retain COLR status.

a. Is it still necessary for the Commission to maintain its COLR rules? Here, the Commission adopts a rebuttable presumption that the COLR construct remains necessary, at least for certain individuals or communities in California.

Response: This question is academic as applied to the Independent Small LECs because each of them is a COLR, and each must retain its COLR status as a matter of law in order to qualify for CHCF-A support.[17] As long as the Independent Small LECs continue to participate in the CHCF-A program, they must be COLRs and the Commission must continue to maintain the COLR designation. However, as explained herein, it is reasonable for the Commission to

[15] *See* R.09-06-019, R.06-06-028.
[16] *See* R.20-02-008; R.23-11-001.
[17] *See* Pub. Util. Code §§ 275.6(d)(3), 275.6(b)(1).

streamline the elements of "basic service" to remove unnecessary obligations. Insofar as this question is seeking input on whether COLR requirements are appropriate in areas served by larger ILECs, the Independent Small LECs have no specific position other than to note that COLR relief may well be appropriate where providers do not receive high-cost support, especially in urban and suburban markets with extensive competition.

b. Should the Commission revise the definition of a COLR, and if yes, how should the Commission revise that definition? What should be the responsibilities of a COLR?

Response: The responsibilities of a COLR should be as stated in Public Utilities Code Section 275.6(b)(1), which defines a COLR as "a telephone corporation that is required to fulfill all reasonable requests for service within its service territory."[18] The Commission should not specify specific types of facilities or technologies that must be used in fulfilling this obligation. For the purpose of this definition, "service" to a location should continue to refer to "the ability to place and receive voice-grade calls over all distances utilizing the public switched telephone network or successor network."[19] Voice-grade service should be defined according to the FCC's transmission "latency" standard, which is 100 milliseconds or less in "round-trip" network signaling speed.[20] It is also reasonable for COLR obligations to include E911 capabilities and access to "8YY" service, telephone relay, and LifeLine service, all of which are components of the current definition. In other respects, as explained further below, the definition of basic service should be streamlined and unnecessary elements should be removed from the expectations attaching to COLR status.

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[18] Pub. Util. Code § 275.6(b)(1).
[19] *See OIR* at 2, n. 5 (citing D.12-12-038, Appendix A).
[20] *See, e.g., In re Deployment of Advanced Telecommunications Capability for All Americans, et al.*, GN Docket No. 22-270, *2024 Section 706 Report*, FCC 24-27 (rel. March 18, 2024) at ¶ 120, n. 367 ("for purposes of the [Broadband Data Collection], low latency services are defined as having a round-trip latency of less than or equal to 100 milliseconds based on the 95th percentile of measurements."). "The FCC mandates that . . . 95 percent of latency measurements be at or below 100 milliseconds round-trip time" for carriers participating in the following funds: Connect America Fund Phase II Model, Connect America Fund Phase II Auction, Alternative Connect America Cost Model, Revised Alternative Connect America Cost Model, Alternative Connect Cost Model II, Enhanced Alternative Connect America Cost Model, Connect America Fund Broadband Loop Support, Rural Digital Opportunity Fund, Rural Broadband Experiments, Alaska Plan, Bringing Puerto Rico Together, and the Connect USVI Fund. https://www.usac.org/high-cost/annual-requirements/performance-measures-testing/.

c. Should the Commission revise how it defines a COLR's service territory?

Response: For the Independent Small LECs, whose networks are organized into wire centers within specific geographic exchange boundaries, the service territory applicable to the COLR designation should be defined according to those exchange boundaries. To the extent that a competing provider seeks COLR status in an ILEC's study area, it should likewise have to be a COLR in the entirety of each exchange for which it seeks such status.

d. Are there regions or territories in California that may no longer require a COLR? Are there regions that require COLR service? If yes, how should the Commission distinguish between the two? What criteria should be met for a region or territory to no longer require COLR designation?

Response: COLR designations may well be unnecessary in some areas, especially urban and suburban areas where there is extensive competition. As explained above, the Independent Small LECs are required to maintain COLR status in their service territories to access CHCF-A, so this question is not applicable to the companies' current circumstances.

e. Can the Commission require Voice over Internet Protocol (VoIP) providers to be COLRs? If yes, should the Commission designate VoIP providers as COLRs?

Response: The Independent Small LECs do not provide retail VoIP service, and, even if they did, it would not change the requirements of Public Utilities Code Section 275.6(d)(3), which requires CHCF-A participants to retain COLR status. Although this question is not currently relevant to the Independent Small LECs' circumstances, there are significant legal obstacles to any attempt to regulate VoIP as an intrastate public utility service. By their nature, VoIP services do not involve "owning, controlling, operating or managing any telephone line," so VoIP providers cannot reasonably be regarded as "telephone corporations" or "public utilities" under state law.[21] Likewise, as a matter of federal law, VoIP service is classified as interstate, and is subject to the FCC's authority, not the jurisdiction of this Commission.[22] The

[21] *See* Pub. Util. Code §§ 216(a)(1), 233, 234; *see also* Pub. Util. Code § 285(a) (incorporating federal definition of "Interconnected VoIP service" by reference to 47 C.F.R. Section 9.3).

[22] *See Vonage Holdings Corporation Petition for Declaratory Ruling Concerning and Order of the Minnesota Public Utilities Commission*, WC Docket No. 03-211, *Memorandum Opinion and Order*, FCC 04-267 (rel. Nov. 12, 2004) at ¶ 22; *Minnesota PUC v. FCC*, 483 F.3d 570 (8th Cir. 2007) (affirming *Vonage* order); *see also Charter Advanced Services, LLC v. Lange*, 903 F.3d 715, 719 (8th Cir. 2018), ("[i]n the absence of direct guidance from the FCC," interconnected VoIP service should be treated as an "information service.") *cert. denied*, 140 S.Ct. 6 (2019).

Independent Small LECs are aware of the pending proposed decision in R.22-08-008 that reaches some contrary conclusions, but the foundation of that proposed decision is incorrect for the same reasons stated herein.

f. Can COLR service be provisioned using wireless voice service? Can the Commission direct wireless voice providers to serve as COLRs? If yes to both, should the Commission designate wireless voice providers as COLRs?

Response: The Independent Small LECs are not mobile wireless providers, but the companies understand that there would be significant legal obstacles to classifying cellular or mobile wireless carriers as COLRs.[23] The Commission should not wade into these legal difficulties.

g. If the Commission does not have the authority to require a wireless voice provider to offer COLR service, is a wireless voice provider eligible to volunteer to be a COLR? If yes, should the Commission grant such an application? Should the requirements of a potential wireless COLR be different than a COLR offering Plain Old Telephone Service (POTS) or VoIP service?

Response: In the rural service territories where the Independent Small LECs serve, mobile wireless service is not sufficiently reliable or consistent to be appropriate as a substitute for wireline service offered by the existing COLRs. Likewise, fixed wireless signals are inconsistent because the call quality can vary based on how far customer locations are from the tower and how many users are on the system at a given time. These limitations make it inappropriate for wireless carriers to seek COLR status at least in Independent Small LEC territories, at this time. To the extent that the Commission nevertheless permits such designations, wireless providers should be subject to the same requirements as wireline providers, including offering "basic service" and serving the entirety of each exchange in which the provider seeks COLR status.

h. Should the Commission revise the requirements of basic service? If yes, which requirements or elements should be revised, and what should be those revisions?

Response: Yes. The roster of basic service elements can and should be streamlined. As the OIR notes, there are currently nine different categories of requirements encompassed by

[23] *See* 47 U.S.C. § 332(c)(3)(A) (preempting state regulation of "entry" and "rates" for wireless services).

basic service.[24] Some of these elements remain essential to any COLR designation, such as the provision of "voice-grade service" and the availability of E911. It is also reasonable to retain "equal access" to interexchange carriers, "8YY" access, telephone relay availability, and access to the LifeLine program as part of the definition of "basic service." As expressed in D.12-12-038, these core elements are Elements 1, 2, 5, 6, and 7. A simplified version of the "billing rules" in Element 4 would also be reasonable to retain, but the majority of the sub-parts of this provision are unnecessary or more appropriate for generic industry-wide consideration.

Several of the requirements of "basic service" under D.12-12-038 are no longer needed. "Directory" service is an outdated feature, as is the current requirement to provide "white pages" listings.[25] Over the past 10 years, the Commission has already granted various requests for alternative delivery mechanisms for "white pages" directories, and the time has come to remove this archaic feature from basic service in its entirety.[26] There are many other online alternatives and third-party resources for directory listing services, so imposing this requirement on COLRs is duplicative and unduly burdensome. For similar reasons, "operator services" is no longer a necessary element of "basic service."[27] Customers use this service very infrequently and usage has continued to decline since the Commission last revisited the definition of basic service in 2012. Most questions that have historically been handled by operators can now be addressed efficiently through customer service representatives or online resources made available apart from any operator services. In addition, Element 8 of the current definition pertains "one-time free blocking" of "9YY" numbers, but these blocking requests are rare and there is no reason to impose this requirement uniquely on COLRs. To the extent that unauthorized charges appear on telephone bills, the Commission already has existing consumer protection rules to address the issue, and these concerns are best addressed on an industrywide basis.[28] Moreover, the "billing provisions" in Element 4 of the basic service definition include archaic and inoperative elements, such as the requirement for a COLR serving a "high-cost area" to maintain rates that "do[] not exceed 150% of the highest basic rate charged by a COLR in California outside of the high-cost

[24] *See OIR*, at 2, n. 5 (citing D.12-12-038, Appendix A).
[25] *See* D.12-12-038, Appendix A (Element 3).
[26] *See* Res. T-17302 (Verizon, 2010), Res. T-17513 (AT&T, 2016), Res. T-17582 (Frontier, 2017).
[27] *See* D.12-12-038, Appendix A (Element 9).
[28] *See* G.O. 168, Part 4; *see also* Pub. Util. Code § 2890.

area."[29] Similarly, the references to offering LifeLine rates on a non-discriminatory basis are surplusage because the terms of the LifeLine program are governed by General Order ("G.O.") 153, which comprehensively addresses carriers' obligations and customers' rights with respect to LifeLine discounts. These and other aspects of the "billing provisions" can be streamlined.

The Independent Small LECs have prepared a redline version of the basic service elements, which is provided herewith as Appendix A. These revisions are intended to streamline, update, and simplify the definitions, and to remove the unnecessary components mentioned herein. In addition to proposing revisions to the "service elements" noted above, the Independent Small LECs have suggested revisions to the "General Requirements" in Appendix A to D.12-12-038, including removal of the outdated references to "G.O. 133-C."

i. Should the Commission revise the subsidy amount offered for participation in the California High Cost Fund-B? What is an appropriate subsidy amount and how should it be calculated?

Response: The Independent Small LECs are not participants in the CHCF-B program and take no position regarding how CHCF-B amounts should be calculated.

j. Should the Commission revise its rules for how and when a COLR is allowed to withdraw from its designated service territory? If so, how should the Commission revise its rules? Should the Commission require that the service of a potential replacement COLR be functionally similar to that of the current COLR? If yes, what similar functionality requirements should the Commission adopt?

Response: The Independent Small LECs have no current plans to withdraw as COLRs, particularly given the requirements to retain COLR status as a contingency for CHCF-A support.[30] Therefore, the Independent Small LECs have no current position on the process for seeking COLR relief. The Independent Small LECs reserve the right to address this topic after reviewing the proposals from other parties.

[29] *See* D.12-12-038, Appendix A (Element 9(g)); *but see* D.14-12-084 at 95 (COL 11) (adopting a "range of reasonableness" for residential rates rather than relying on a strict "150%" rule).
[30] *See* Pub. Util. Code § 275.6(d)(3).

k. When should a COLR seeking to withdraw be required to notify residents in the COLR territory of its request to withdraw? What should be included in the contents of that notification? What method(s) should be used for notification?

Response: As explained above, the Independent Small LECs have no current plans to withdraw as COLRs, so they have no current position regarding the customer notification that might be needed to effectuate that process. Again, the Independent Small LECs reserve the right to address this topic after reviewing the presentations from other parties.

l. If a COLR applies to withdraw, and a new COLR is designated, is there a need for a customer transition period? If yes, how long should that transition period last? What customer service protections, if any, should the Commission impose as part of a customer transition period? What other elements or processes, other than customer protections, should be provided in a customer transition period? How long should a customer transition period last?

Response: Consistent with the above responses, the Independent Small LECs hereby reiterate that they have no current plans to withdraw as COLRs. Therefore, they have no specific comments on a "transition" process. However, the Independent Small LECs note that this question appears to contemplate a migration of customers, and there is no reason to expect such a step just because a new provider receives a "COLR" designation. As the Independent Small LECs understand the COLR framework, any withdrawal of COLR service would not be tantamount to a withdrawal from the market.

VII. CONCLUSION.

Given their participation in the CHCF-A program and the attendant imperative to retain COLR status, the Independent Small LECs have a limited focus in this proceeding. The Commission should implement reasonable revisions to the definition of "basic service," as proposed in Appendix A hereto. As to the other issues in this proceeding, the Commission should look for opportunities to limit the Independent Small LECs' participation to avoid the imposition of unjustified and unrecoverable regulatory costs.

Respectfully submitted on September 30, 2024 at Oakland, California.

Chan Q. Vu
BRB Law LLP
492 9th Street, Suite 220
Oakland, CA 94607
Phone: (510) 955-1087
Email: qc@brblawgroup.com

By */s/ Chan Q. Vu*
Chan Q. Vu

Attorneys for the Independent Small LECs