



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

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

REVISIONS TO INITIAL PROPOSALS OF

**HAPPY VALLEY TELEPHONE COMPANY (U 1010 C)
HORNITOS TELEPHONE COMPANY (U 1011 C)
WINTERHAVEN TELEPHONE COMPANY (U 1021 C)
(THE "TDS COMPANIES")**

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

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December 6, 2024

Pursuant to the schedule set forth by the June 28, 2024 Order Instituting Rulemaking (“OIR”), Happy Valley Telephone Company (U 1010 C), Hornitos Telephone Company (U 1011 C), and Winterhaven Telephone Company (U 1021 C) (collectively, the “TDS Companies”) submit these Revisions to Initial Proposals on the Order Instituting Rulemaking Proceeding to Consider Changes to the Commission’s Carrier of Last Resort (“COLR”) Rules.

The TDS Companies revise their initial proposals to support Pacific Bell Telephone Company d/b/a AT&T California’s (“AT&T”) proposal that this rulemaking proceed in two phases but suggest that the Commission consider all alternative voice services, and not just broadband, in evaluating whether an area is “well-served.”¹ Specifically, the TDS Companies suggest that the first phase consider areas well-served with broadband or alternative voice services.² As AT&T recommends, the first phase should also result in the removal of COLR obligations in areas with no population, no current COLR basic telephone service customers, and no serviceable locations.³ The second phase should address areas not yet well-served with broadband or alternative voice services.⁴ Although the TDS Companies oppose the inclusion of broadband services within the scope of this COLR rulemaking or within the definition of “basic telephone service,” if the Commission considers the inclusion of broadband services, this issue should be addressed in a separate, third phase. Joint Commenters also support the consideration of broadband services in a separate track.⁵

Respectfully submitted on December 6, 2024.

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¹ See, e.g., *AT&T Reply Comments* at 28 (suggesting workshop to develop definition of “well-served”).

² See *id.* at 7-8, 22.

³ See *id.* at 22, 26.

⁴ See *id.* at 28-29.

⁵ See *Joint Commenters’ Reply Comments* at 30 (“Joint Commenters agree with Cal Advocates and SBUA that the inclusion of broadband services is ripe for consideration but reiterate that there are several important issues that must be addressed in order to adopt this proposal, which the Commission should consider in a separate track in this proceeding.”).