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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.

Rulemaking 24-06-012

**ADMINISTRATIVE LAW JUDGE'S RULING REGARDING COMMENTS ON
TOPICS DISCUSSED AT AUGUST 22, 2025 WORKSHOP**

This Ruling notices the availability of video footage of a workshop held by the California Public Utilities Commission (Commission) in this proceeding. Parties may file and serve comments on the discussion at the workshop and are asked to respond to several questions related to the workshop, as well as additional questions. Further, certain carriers are ordered to respond to specific questions.

Opening Comments must be filed and served by no later than October 31, 2025. Reply Comments may be filed and served by no later than November 7, 2025.

1. Background

The schedule in the Assigned Commissioner's Scoping Memo and Ruling, issued February 4, 2025, notes that workshops will occur in the March 2025 to June 2025 timeframe.¹ Workshops occurred on April 4 and April 11, 2025. An additional remote workshop discussing relevant federal policy, how carrier of

¹ Assigned Commissioner's Scoping Memo and Ruling, at 5.

last resort (COLR) obligations impact accessibility, and ancillary services was held on August 22, 2025.

2. August 22 Workshop

A video recording of the remote workshop held on August 22, 2025 (Workshop #3 Video) is available on the Commission's website at <https://www.youtube.com/watch?v=OW7wNgqPXZ8>.

Panelists are listed below.

Panel 1: Federal Policy

- Harold Feld, Public Knowledge
- Kathryn de Wit, Pew Charitable Trusts

Panel 2: Accessibility

- Katie Wright, Telecommunications Access for the Deaf and Disabled Administrative Committee
- Greg Hlibok, ZVRS and Purple Communications
- Jeff Rosen, Convo Communications

Panel 3: Ancillary Services

- Commander Alicia Fuller, California Highway Patrol
- Jeremiah Pearce, CalTrans District 2
- Keith Koeppen, CalTrans District 2
- Sarah Wilson, California Alarm Association

3. Question For Parties

Parties may respond to any comment made at the August 22 Workshop and are asked to address the questions discussed below. Respondents are directed to answer all applicable questions.

Federal Policy

1. Panelist Harold Feld indicated that the Federal Communications Commission (FCC) has adopted "streamlined proceedings" for applications to discontinue

service under Section 214 of the federal Telecommunications Act,² in which “there is a very short period of time to raise objections...and if the FCC does not act to take the application off of fast track, the application is granted automatically.”³ Was Mr. Feld’s description of the FCC’s Domestic Section 214 Discontinuance process accurate? Do parties wish to clarify any details? How does the FCC’s Domestic Section 214 Discontinuance process impact COLR obligations? Given this process, should the Commission assume that a COLR granted relief from its obligation to provide basic service in a given area also is likely to receive FCC Section 214 “Fast Track” approval from the FCC to discontinue service in that same area? Should FCC approval be a precondition for applying for COLR withdrawal?

Accessibility

1. To what extent is California Relay Service, or any other element of basic service, necessary to ensure accessibility of essential communications services, compatible with IP-enabled advanced networks, Voice over Internet Protocol (VoIP), or wireless products?
2. To what extent are the equipment and services, such as Teletypewriters/TTY services, and other equipment and services provided through California Connect, compatible with advanced, IP-enabled networks and Voice over Internet Protocol (VoIP) products? To what extent are these compatible with wireless networks? For responding carriers, please specify which equipment and services are not compatible with your networks.
3. What customer protections or other rules are necessary or appropriate to ensure the continuity of service for customers reliant on California Relay Service, TTY services, or other equipment and services provided by California Connect, if COLRs are granted relief from the obligation to

² Also called Domestic Section 214 Discontinuance Applications.

³ Workshop #3 Video, starting at 20:56.

provide basic service, or choose to no longer offer it over plain old telephone service (POTS)?

4. Basic service requires free access to California Relay Service. Are there any cases in which a provider has charged for access to relay service in the absence of an obligation to provide it for free? Should the Commission consider placing the requirement to offer free access to California Relay Service on other carriers if the COLR withdraws? Is access to California Relay Service possible through wireless and VoIP services?

Ancillary Services

1. What requirements, both legal and technical, are needed to ensure communications service continuity if an incumbent local exchange carrier (ILEC) elects to retire copper infrastructure as a result of COLR withdrawal? Parties are asked to identify any specific changes recommended for General Order 138, "Rules for the Connection of Customer-Provided Equipment to Public Utility Telephone Company Systems," or General Order 152-A, "Rules Governing Private Line Alarm Service," or other rules and regulations under the Commission's jurisdiction.
2. At the August 22 Workshop, panelists identified the following ancillary services that rely primarily on copper telecommunications infrastructure: highway call boxes, electronic highway signage, and alarm systems. This Ruling also inquires about emergency communications service for elevators. Are there other ancillary services that may be impacted by a COLR withdrawal? Is it reasonable to make any special provisions for alarm systems serving schools compared to alarm systems serving other customers?
3. What notice and engagement should a COLR be required to provide to ancillary service providers prior to being granted withdrawal? What entities should receive notice prior to withdrawal? What information should be provided in the notice? How should the notice be distributed? How far in advance should ancillary service

providers be notified? What should the steps be if the service is incompatible with the change in service or technology?

4. What impacts are possible in a transition from legacy network elements companies claim they use to satisfy the COLR obligations to modern networks if COLR obligations were eliminated? What impacts could the public or customers experience?

Miscellaneous

1. If a COLR applies to relinquish its obligation, what are reasonable restrictions on the area covered by a single application? Should there be a maximum number of affected customers, a maximum population size, and/or a maximum geographic area? Should there be a limit on the number of applications submitted in a calendar year? Aside from broadband maps and mobile coverage maps, what data driven resources are available for providers to demonstrate the presence of other voice providers within COLR territories that can be evaluated appropriately by the Commission and affected stakeholders?
2. Panelist Harold Feld indicated, "Copper is extremely expensive to maintain. The equipment which is used to support traditional copper phone networks is no longer being manufactured."⁴ Is this statement accurate? COLRs shall explain how they source necessary equipment when repairs to the legacy copper network are needed. COLRs also shall provide information on the cost of maintaining legacy copper networks broken out by relevant cost categories (such as cost of technicians, cost of equipment, etc.) with as much detail as possible.

4. Ordering Carriers to Provide Information

Carriers are ordered to respond to the specific questions listed below.

⁴ Workshop #3 Video, starting at 55:43.

1. All respondent COLRs⁵ are ordered to submit a .shp file indicating the point-level locations of all customers subscribed to basic service as of January 1, 2025.
2. All respondent COLRs are ordered to respond to the following questions:
 - How many customers were subscribed to basic service as of January 1, 2025? Please provide separate totals for residential and non-residential customers, and report totals statewide and by county based on the customer's billing address.
 - Of customers subscribed to basic service as of January 1, 2025, how many are served by copper wiring at the customer premises? How many are served by technology other than copper?
 - Of customers subscribed to basic service as of January 1, 2025, how many are participants in the California Connect (also known as DDTP) program?
 - Of customers subscribed to basic service as of January 1, 2025, how many are California LifeLine participants?
 - How many voice calls were made in 2020, 2021, 2022, 2023, and 2024? Please provide totals statewide and by county of the customer placing the call.
 - How many calls requesting operator services were completed in 2020, 2021, 2022, 2023, and 2024? Please provide totals statewide and by county of the customer originating the call.
 - How many calls for 911 services were completed in 2020, 2021, 2022, 2023, and 2024? Please provide totals statewide and by county of the customer originating the call.

⁵ See, Assigned Commissioner's Scoping Memo and Ruling at 14. The Independent Small LECs requested and were de-designated as respondents in this proceeding.

- How many requests for directory services were received in 2020, 2021, 2022, 2023, and 2024? Please provide totals statewide and by county of the customer placing the request.
- How many calls to toll-free 8YY services were completed in 2020, 2021, 2022, 2023, and 2024? Please provide totals statewide and by county of the customer originating the call.
- How many calls to 988, or the National Suicide and Crisis Lifeline, were completed in 2020, 2021, 2022, 2023, and 2024? Please provide totals statewide and by county of the customer originating the call.
- How many calls to 211 services were completed in 2020, 2021, 2022, 2023, and 2024? Please provide totals statewide and by county of the customer originating the call.
- How many calls to 811 services were completed in 2020, 2021, 2022, 2023, and 2024? Please provide totals statewide and by county of the customer originating the call.
- How many calls utilizing California Relay Service were completed in 2020, 2021, 2022, 2023, and 2024? How many of these calls were originated by basic service customers? Please provide totals statewide and by county of the customer originating the call.
- How many basic service customers utilize equipment or services through California Connect as of January 1, 2025? How many customers subscribed to services other than basic service utilize equipment or services from California Connect as of January 1, 2025?⁶
- How many customers receive service for a fire or burglar alarm over POTS as of January 1, 2025? How many customers subscribed to services other than basic

⁶ A list of equipment and services offered through California Connect is available on the California Connect website: <https://caconnect.org/equipment-services>

service also receive service for a fire or burglar alarm as of January 1, 2025? Please provide totals statewide and by county, and provide totals for residential and non-residential customers separately.

3. AT&T (AT&T California and AT&T Mobility), Frontier, Consolidated, Comcast, Charter, Cox, Verizon, and T-Mobile are ordered to identify which of your products (excluding POTS), if any, are compatible with California Relay Service. Identify the conditions under which these products are able to offer service (For example, does a specific product require back-up power? Is there a specific type of equipment necessary for a product to function? Are there other conditions necessary for the product to function?). Given its application to acquire Frontier California,⁷ Verizon shall ensure its response is inclusive of both wireless and any wireline solutions that may be offered in California.
4. AT&T (AT&T California and AT&T Mobility), Frontier, Consolidated, Comcast, Charter, Cox, Verizon, and T-Mobile are ordered to identify which products (excluding POTS) are compatible with Teletypewriters/TTY services and other equipment and services provided through California Connect. Specify the conditions under which your carrier is able to offer such services. Specify which equipment and services are not compatible with your networks. Verizon shall ensure its response is inclusive of both wireless and any wireline solutions that may be offered in California.
5. AT&T (AT&T California and AT&T Mobility), Frontier, Consolidated, Comcast, Charter, Cox, Verizon, and T-

⁷ Application 24-10-006, *In the Matter of the Joint Application of Verizon Communications Inc., Frontier Communications Parent, Inc., Frontier California Inc., Citizens Telecommunications Company of California Inc., Frontier Communications of the Southwest Inc., Frontier Communications Online and Long Distance Inc., and Frontier Communications of America, Inc. for Approval of the Transfer of Control of Frontier California Inc. (U1002C), Citizens Telecommunications Company of California (U1024C), Frontier Communications of the Southwest Inc. (U1026C), Frontier Communications Online and Long Distance Inc. (U7167C), and Frontier Communications of America, Inc. (U5429C), to Verizon Communications Inc. Pursuant to California Public Utilities Code Section 854.*

Mobile are ordered to identify which products (excluding POTS) supports elevator emergency systems,⁸ highway call boxes, alarm systems, or any other ancillary services. For responding providers, please indicate whether the infrastructure serving any of your voice products are not compatible with elevator emergency systems,⁹ highway call boxes, electronic highway signage, alarm systems, or any other ancillary services. Verizon shall ensure its response is inclusive of both wireless and any wireline solutions that may be offered in California.

5. Ordering Frontier to Respond to May 19, 2025 Ruling

A notable absence from responses to the Ruling of the Assigned Administrative Law Judge issued on May 19, 2025 is Frontier. While the Ruling allowed parties the option to not respond, the record is incomplete without a response from the second largest COLR in California. Thus, Frontier is ordered to answer in full the questions in the May 19, 2025 Ruling. Frontier shall respond by October 31, 2025.

IT IS RULED that:

1. Notice is given regarding the video recording of the August 22, 2025 workshop that this proceeding.
2. On or before October 31, 2025, parties may file and serve Opening Comments on the questions listed above in Section 3. Reply Comments may be filed and served by no later than November 7, 2025.
3. By not later than October 31, 2025, all respondents are ordered to respond in full to the questions listed above in Section 3.

⁸ It is our understanding that a dedicated cell or smart phone permanently mounted in an elevator car does not meet the requirement that an elevator has an emergency signaling device.

⁹ It is our understanding that a dedicated cell or smart phone permanently mounted in an elevator car does not meet the requirement that an elevator has an emergency signaling device.

4. By not later than October 31, 2025, all carriers specified in Section 4 shall respond in full to the questions directed at them in Section 4.

5. By not later than October 31, 2025, Frontier is ordered to respond in full to the Ruling of the Assigned Administrative Law Judge issued on May 19, 2025.

Dated October 1, 2025, at San Francisco, California.

/s/ THOMAS J. GLEGOLA

Thomas J. Glegola
Administrative Law Judge