



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

**FILED**

12/19/25

09:40 AM

**K2512013**

**Appeal of Alleswolke Wireless LLC  
U4630C from Citation No. CD-2025-11-001  
in the amount of \$21,000 issued November  
20, 2025, by the Communications Division  
Pursuant to T-17601**

**NOTICE OF APPEAL**

Alleswolke Wireless LLC U4630C files this Notice of Appeal from Citation No. CD-2025-11-001 in the amount of \$21,000 issued on November 20, 2025, by the Communications Division Pursuant to Resolution T-17601.

The rationale for the appeal is as follows:

Alleswolke Wireless LLC (“Alleswolke”) appeals Citation No. CD-2025-11-001 in the amount of \$21,000 (the “citation”) as excessive and unfairly punitive compared to the alleged non-compliance with Commission rules. The Communications Division issued the citation for failure to obtain a wireless registration pursuant to Commission Decision 94-10-031. The citation set the \$21,000 penalty based on the finding that Alleswolke had been providing commercial mobile radio services (“CMRS”) in California since February 2, 2024. The \$21,000 total represents the maximum possible penalty pursuant to Resolution T-17601, *i.e.*, the maximum \$1,000 penalty for each month Alleswolke provided CMRS services in California without registration. As discussed in more detail below, this amount is excessive considering Alleswolke's limited operations in California and the materiality of the alleged non-compliance.

Alleswolke began limited CMRS operations in California in February 2024 through a “soft-launch,” but did not conduct significant operations in California prior to obtaining registration. Alleswolke’s California CMRS operations were extremely limited during the period for which the fine was assessed, with fewer than ten access lines for many applicable months and no more than 138 access lines during any single month. Table 1

below provides Alleswolke’s CMRS access line totals for February 2024 through October 2025.

**Table 1 – Access Lines**

Report Period	Number of Access Lines served in 2024	Number of Access Lines served in 2025
January	█	█
February	█	█
March	█	█
April	█	█
May	█	█
June	█	█
July	█	█
August	█	█
September	█	█
October	█	█
November N/A	█	█
December	█	█

Alleswolke’s California intrastate revenues were similarly insignificant. In fact, total intrastate revenues were less than the \$1,000 per-month fine in many months. Table 2 below shows intrastate revenues by month.

**Table 2 – Intrastate Revenues**

Report Period	2024 Intrastate Revenues	2025 Intrastate Revenues
January	█	█
February	█	█

March	██████		██████	
April	██████		██████	
May	██████		██████	
June	██████		██████	
July	██████		██████	
August	██████		██████	
September	██████		██████	
October	██████		██████	
November	██████		██████	
December	██████		██████	

To further underscore the limited CMRS activities at issue here, Alleswolke notes that it primarily provides data services, while voice usage accounts for only approximately 0.3% of total traffic and SMS usage accounts for approximately 0.03%. In addition, Alleswolke did not advertise services in California prior to obtaining its wireless registration. Instead, Alleswolke provided services to a limited pool of individuals, with the business model focused on short-term travel connectivity for international students traveling from China to the United States.

The proposed \$21,000 fine represents the maximum possible amount under Resolution T-17601 and is excessive given the nature of Alleswolke’s operations. Fining a small startup company the maximum possible amount, including for periods in which it served only a negligible number of “soft launch” customers in California, does not serve the public interest, but instead will deprive customers of future choices in providers. No customers were harmed by the company’s lack of registration and the company sought to remedy the oversight as soon as it identified the registration requirement. Though Resolution T-17601 establishes a maximum penalty schedule, it does not require the Commission to levy maximum fines in all circumstances. Alleswolke requests that the Commission consider the unique circumstances, particularly the company’s limited financial resources and the *de minimis* real-world impact of the alleged noncompliance, and reduce the fine accordingly. Specifically, Alleswolke believes that a penalty of no more than \$5,000 is appropriate under these circumstances and requests the Commission to reduce the penalty set forth in the citation accordingly.

Dated 2025-12-18 , at 39899 Balentine Dr, Suite 200, Newark, California.

Signature Rui Zhu  
Name Rui Zhu  
Title Chief Executive Officer  
Mailing Address 39899 Balentine Dr, Suite 200, Newark, CA  
Telephone 415-850-4263  
Email jerryz@alleswolke.com

Attachments

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## **PRIVACY NOTICE**

This message is to inform you that the Docket Office of the California Public Utilities Commission (CPUC) intends to file the above referenced Notice of Appeal electronically instead of in paper form as it was submitted.

Please note: Whether or not your Notice of Appeal is filed in paper form or electronically, Notices of Appeal filed with the CPUC become a public record and may be posted on the CPUC's website. Therefore, any information you provide in the Notice of Appeal, including but not limited to, your name, address, city, state, zip code, telephone number, email address and the rationale for your Notice of Appeal may be available on-line for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced Notice of Appeal.

	2025-12-18
_____ Signature (same as person authorized to sign the Notice of Appeal)	_____ Date

Name     Rui Zhu    

Title     Chief Executive Officer    

Mailing Address     39899 Balentine Dr, Suite 200, Newark, CA    

Telephone     415-850-4263    

Email     jerryz@alleswolke.com

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

Appeal of [Utility Name] [Utility ID] from  
Citation No. [Citation Number] in the  
amount of [Fine Amount] issued [Citation  
Issuance Date], by the Communications  
Division Pursuant to T-17601

(Leave blank for CPUC use.)

**CERTIFICATE OF SERVICE**

*(Note: When filing by electronic copy, the Certificate of Service and Notice of Appeal must  
be filed as separate documents.)*

I certify that on \_\_\_\_\_ December 18, 2025 \_\_\_\_\_, I have by  
mail this day served a true copy of the original attached Notice of Appeal to the  
following individuals of CPUC, with office address at 505 Van Ness Avenue, San  
Francisco, CA 94102.

**Docket Office**

California Public Utilities Commission  
505 Van Ness Ave. San Francisco, CA 94102  
EMAIL: [ALJ\\_Docket\\_Office@cpuc.ca.gov](mailto:ALJ_Docket_Office@cpuc.ca.gov)

**Robert Osborn, Director**

Communications Division  
California Public Utilities Commission  
505 Van Ness Ave. San Francisco, CA 94102  
EMAIL: [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov)


**Michelle Cooke, Chief Administrative Law Judge**

Administrative Law Division  
California Public Utilities Commission  
505 Van Ness Ave., San Francisco, CA 94102  
EMAIL: [Michelle.Cooke@cpuc.ca.gov](mailto:Michelle.Cooke@cpuc.ca.gov)

**ALJ Division Appeals Coordinator**  
Administrative Law Division  
California Public Utilities Commission  
505 Van Ness Ave. San Francisco, CA 94102  
EMAIL: [ALJ\\_Div\\_Appeals\\_Coordinator@cpuc.ca.gov](mailto:ALJ_Div_Appeals_Coordinator@cpuc.ca.gov)

(Insert additional names, addresses and emails of anyone else required to be served  
by the Citation Program you are cited under):

Dated 2025-12-18, at 39899 Balentine Dr, Suite 200, Newark, California.

Signature   
Name Rui Zhu  
Title Chief Executive Officer  
Mailing Address 39899 Balentine Dr, Suite 200, Newark, CA  
Telephone 415-850-4263  
Email jerryz@alleswolke.com