



Decision \_\_\_\_\_

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

Order Instituting Rulemaking Regarding  
Revisions to the California Advanced  
Services Fund

Rulemaking 20-08-021  
(Filed August 27, 2020)

12/26

01:50 PM

**INTERVENOR COMPENSATION CLAIM OF CENTER FOR ACCESSIBLE  
TECHNOLOGY AND DECISION ON INTERVENOR COMPENSATION CLAIM OF  
CENTER FOR ACCESSIBLE TECHNOLOGY**

**NOTE:** After electronically filing a PDF copy of this Intervenor Compensation Claim (Request), please email the document in an MS WORD and supporting EXCEL spreadsheet to the Intervenor Compensation Program Coordinator at [Icompcoordinator@cpuc.ca.gov](mailto:Icompcoordinator@cpuc.ca.gov).

<b>Intervenor:</b> Center for Accessible Technology	<b>For contribution to Decisions (D.) D.24-03-041, D.25-11-003</b>
<b>Claimed:</b> \$ 21,065.75	<b>Awarded:</b> \$
<b>Assigned Commissioner:</b> Darcie L. Houck	<b>Assigned ALJ:</b> Valerie Kao
I hereby certify that the information I have set forth in Parts I, II, and III of this Claim is true to my best knowledge, information and belief. I further certify that, in conformance with the Rules of Practice and Procedure, this Claim has been served this day upon all required persons (as set forth in the Certificate of Service attached as Attachment 1).	
<b>Signature:</b>	/s/ <i>Paul Goodman</i>
<b>Date:</b> January 23, 2026	<b>Printed Name:</b> <b>Paul Goodman</b>

**PART I: PROCEDURAL ISSUES**  
***(to be completed by Intervenor except where indicated)***

<b>A. Brief description of Decision:</b>	D.24-03-041 (the BPHA Decision) adopted modifications to the Broadband Public Housing Account and Tribal Technical Assistance program rules and guidelines. Modifications to the Broadband Public Housing Account expanded eligibility for non-publicly supported housing developments and for project costs to facilitate deployment of broadband networks in low-income communities that lack access to free broadband service that meets state standards. Modifications to the Tribal Technical Assistance program included updates
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	<p>to align with the Local Agency Technical Assistance program rules and guidelines.</p> <p>D.25-11-003 (the Broadband Decision) modified the program requirements and guidelines for the California Advanced Services Fund Broadband Adoption Account, Rural and Urban Regional Broadband Consortia Account, and Line Extension Program, to maximize broadband infrastructure deployment. The decision also denied a petition for modification regarding requirements for the Broadband Infrastructure Grant Account, as the Commission is addressing a related matter in Rulemaking 20-02-008 regarding the California LifeLine Program.</p>
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**B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812<sup>1</sup>:**

	Intervenor	CPUC Verification
<b>Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):</b>		
1. Date of Prehearing Conference:	10/01/2020	
2. Other specified date for NOI:	See Comment 1.	
3. Date NOI filed:	3/14/2022	
4. Was the NOI timely filed?		
<b>Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):</b>		
5. Based on ALJ ruling issued in proceeding number:	See below	
6. Date of ALJ ruling:	See below	
7. Based on another CPUC determination (specify):	D.21-09-034, see below	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		
<b>Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):</b>		
9. Based on ALJ ruling issued in proceeding number:	R.20-08-021	
10. Date of ALJ ruling:	3/16/2023	

<sup>1</sup> All statutory references are to California Public Utilities Code unless indicated otherwise.

	<b>Intervenor</b>	<b>CPUC Verification</b>
11. Based on another CPUC determination (specify):	CforAT has previously been determined to be eligible for compensation and has been awarded compensation in this proceeding. <i>See</i> D.23-03-030 and D.24-06-018. These previous decisions found that CforAT has demonstrated significant financial. See Comment 2 below.	
12. Has the Intervenor demonstrated significant financial hardship?		
<b>Timely request for compensation (§ 1804(c)):</b>		
13. Identify Final Decision:	D.24-03-041, D.25-11-003	
14. Date of issuance of Final Order or Decision:	March 12, 2024, November 25, 2025	
15. File date of compensation request:	January 23, 2026	
16. Was the request for compensation timely?		

**C. Additional Comments on Part I: *(use line reference # as appropriate)***

<b>#</b>	<b>Intervenor's Comment(s)</b>	<b>CPUC Discussion</b>
1	CforAT was not a party to the initial phase of this proceeding, but obtained party status on March 18, 2022 with the beginning of Phase 2. On March 1, 2022, the Commission issued the Assigned Commissioner's Second Amended Scoping Memo and Ruling, which instructed parties seeking intervenor compensation to serve an NOI within 30 days after the issue date of that Memo and ruling. R.20-08-021, Order	

#	Intervenor's Comment(s)	CPUC Discussion
	Instituting Rulemaking Regarding Revisions to the California Advanced Services Fund, Assigned Commissioner's Second Amended Scoping Memo and Ruling at p. 29. CforAT's NOI was timely filed within the deadline set in the Second Amended Scoping Memo and Ruling.	
2	CforAT has previously been determined to be eligible for compensation and has been awarded compensation for substantial contributions to prior decisions in this proceeding, D.23-03-030 and D.24-06-018. “A party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding.” CPUC Rules of Practice and Procedure, Rule 17.2	

**PART II: SUBSTANTIAL CONTRIBUTION**  
*(to be completed by Intervenor except where indicated)*

**A. Did the Intervenor substantially contribute to the final decision (see § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059): (For each contribution, support with specific reference to the record.)**

<b>Intervenor's Claimed Contribution(s)</b>	<b>Specific References to Intervenor's Claimed Contribution(s)</b>	<b>CPUC Discussion</b>
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<p><b>Background/Overview:</b></p> <p>Since joining this proceeding in Phase 2, CforAT has been an active participant in order to address issues of concern to our constituency of customers with disabilities, who are disproportionately low-income and who live in all areas of the state. CforAT has participated as part of a broad coalition of advocates as appropriate in order to efficiently advance the interests of our constituency.</p> <p>CforAT's work leading to the BPHA Decision and the Broadband Decision was appropriate and the arguments put forward by CforAT contributed substantially to the Commission's consideration of the important policy issues raised. As illustrated in greater detail below, the Decisions substantially reflect the input of CforAT, and the Commission should find a substantial contribution warranting an award of intervenor compensation for the work conducted by CforAT.</p> <p>CforAT's relevant filings related to the two decisions addressed in this request for compensation include the following:</p> <p>Comments on Assigned Commissioner's Ruling Inviting Comments on Proposed Modifications to Broadband Public Housing</p>		
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<p>Account Program, filed May 19, 2023 (Comments on BPHA Proposals).</p>		
<p>Reply Comments on Assigned Commissioner's Ruling Inviting Comments on Proposed Modifications to Broadband Public Housing Account Program, filed jointly with TURN on May 26, 2023 (Reply Comments on BPHA Proposals).</p>		
<p>Comments on Assigned Commissioner's Ruling Inviting Comment on Staff Proposals for Modifications to Broadband Public Housing Account Rules and Guidelines and Tribal Technical Assistance Program Rules and Guidelines, filed December 8, 2023 (Comments on BPHA and TTAP Staff Proposal).</p>		
<p>Comments on Assigned Commissioner's Ruling Inviting Comments on Staff Proposals for Modifications to Line Extension Program, Adoption Account, and Consortia Account, filed January 31, 2025 (Comments on LEP/BAA/BCA Proposals).</p>		
<p>Opening Comments on Proposed Decision Adopting Modifications to Broadband Adoption Account, Rural and Urban Regional Broadband Consortia Account, and Line Extension Program Requirements, filed October 16, 2025 (Comments on Broadband PD).</p>		

<p><b>Modifications to the Broadband Public Housing Account and Tribal Technical Assistance Program Rules and Guidelines:</b></p> <p>In response to proposals issued by the Commission, CforAT recommended that the BPHA should cover construction of interconnection routes for all applicants that are unable to secure affordable interconnection access, given existing challenges with obtaining affordable interconnection access and regulatory uncertainty of future interconnection access. CforAT noted that challenges with affordable interconnection access are likely to increase due to the recent FCC Unbundling Obligations Review Order and emphasized that California's projects should not rely on interconnections with providers who are not explicitly required to provide connections and are likely to cause delays. Comments on BPHA Proposals at pp. 4-6, cited in BPHA Decision at p. 13.</p> <p>CforAT opposed CalBroadband/CCTA's faulty interpretation of section 281(i) of the California Public Utilities Code and their incorrect argument against the Internet Extension grant. CforAT explained that the statutory language does not restrict access to BPHA-funded</p>	<p><b>D.24-03-041 (The BPHA Decision):</b></p> <p>In response to comments by CforAT and other parties, Commission staff made modifications and clarifications to the staff proposal attached to the April 27, 2023 ruling. BPHA Decision at p. 4. The BPHA Decision specifically confirms that changes to the revised staff proposal (attached to Decision as Appendix A) were based on comments by CforAT and other parties on the original staff proposal. BPHA Decision at pp. 12-14.</p> <p>In particular, in response to CforAT's recommendation that the BPHA should cover costs for construction of interconnection routes for all applicants unable to obtain affordable interconnection access, the revised staff proposal includes provisions to reimburse costs for interconnection and backhaul services. BPHA Decision at p. 13.; Appendix A at pp. 2-6.</p> <p>While acknowledging CforAT's input that the Public Utilities Code does not restrict access to only residents of low-income communities, the revised staff proposal "reflects modifications to more closely align with the intent to support Internet access for residents in low-income communities." BPHA Decision at pp. 13-14; Appendix A at p. 6. The</p>	
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<p>networks to only residents of low-income communities and recommended that the Commission reject CalBroadband/CCTA's interpretation of the legislation. Reply Comments on BPHA Proposals at pp. 6-7, cited in BPHA Decision at p. 13.</p>	<p>BPHA Decision also "confirms that Internet Extension projects are intended to serve residents in low-income communities and eligible BPHA Infrastructure grantees." Id. at p. 14. Based on consideration of CforAT's input, the BPHA Decision clarified the intent of Internet Extension projects and adopted the modified staff proposal; accordingly, CforAT influenced Commission decisionmaking.</p>	
<p>CforAT recommended open access requirements for BPHA-funded projects. Comments on BPHA Proposals at pp. 5-6.</p>	<p>The revised staff proposal adds open access requirements. BPHA Decision, Appendix A at pp. 3, 5, 24.</p>	
<p>CforAT detailed concerns about providers installing soon-to-be obsolete equipment and recommended that the Commission require applicants to identify any equipment declared "end-of-sale" or "end-of-life" and provide the date that the manufacturer will no longer sell or support that equipment. Comments on BPHA Proposals at pp. 1-2.</p>	<p>The revised staff proposal adds requirements for end-of-service-life dates of networking equipment. BPHA Decision, Appendix A at p. 17.</p>	
<p>CforAT generally supported the revised staff proposal and specifically supported the modifications in the revised staff proposal to include requirements for open access and end-of-service-life dates of networking equipment. Comments on BPHA and TTAP Staff Proposal at pp. 1, 3-4, cited in BPHA Decision at pp. 4-5.</p>	<p>Consistent with CforAT's position, the BPHA Decision adopts the revised staff proposal, including requirements for open access and end-of-service-life dates of networking equipment. BPHA Decision at p. 15.</p>	
<p>CforAT recommended that the Commission clarify that the obligation to provide free</p>	<p>Based on points raised by CforAT, the BPHA Decision clarifies the intent for</p>	

<p>broadband service is not dependent on public purpose subsidies or other funding. CforAT distinguished between the terms “no cost” and “free” and referenced the Commission’s determination in Res. T-17775 that “no cost” denotes unsubsidized service that is free to customers, while subsidized funding may not be free to customers due to a program ending or lack of customer eligibility.</p> <p>Comments on BPHA and TTAP Staff Proposal at pp. 2-3, cited in BPHA Decision at p. 6.</p>	<p>BPHA grant recipients to provide broadband service at no cost to residents of the low-income community without subsidies or other funding and emphasizes the consistency of this intent with Res. T-17775. As recommended by CforAT, the BPHA Decision clarifies this intent and modifies the revised staff proposal. BPHA Decision at pp. 6-7; Appendix A at p. 18.</p>	
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<p><b>Modifications to the Line Extension Program, Broadband Adoption Account, and Broadband Consortia Account Rules and Guidelines:</b></p> <p>CforAT generally supported adoption of the Staff Proposals for Modifications to the Line Extension program, Adoption Account and Consortia Account with recommendations for modifications to the eligible applicants and funding levels for the Line Extension Pilot Program and financial conditions for applicant eligibility, definitions, and applicant/grantee accountability for Adoption Account. Comments on LEP/BAA/BCA Proposals at pp. 2-12.</p> <p>While CforAT generally supported proposed changes to expand eligibility for the Line Extension Program, CforAT also raised concerns that the proposal to expand eligibility to applicants who do not meet low-income thresholds could create skewed incentives resulting in applicants pursuing projects for high-income areas over low-income households for whom the Commission aims to expand access. Accordingly, CforAT recommended that the Commission revise the proposed rule to require that at least 50 percent of a project's customers meet the income-</p>	<p><b>D.25-11-003 (The Broadband Decision):</b></p> <p>Consistent with CforAT's general support for expanded eligibility and emphasis on ensuring focus on expanding access for low-income households, the Broadband Decision adopts the staff proposal with modifications recommended by parties. Broadband Decision at pp. 6-7.</p> <p>The Broadband Decision articulates the Commission's goal of "prioritizing households with the greatest need for financial assistance." Broadband Decision at pp. 6-7. The Broadband Decision also "adopt[s] CforAT's recommended requirement that at least 50 percent of a project's customers meet the income-based criteria in order to receive 100 percent funding, to preserve funds for households with the greatest need for financial assistance." Broadband Decision at p. 7.</p>	
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<p>based criteria in order to receive 100 percent funding. Comments on LEP/BAA/BCA Proposals at pp. 2-4, cited in Broadband Decision at pp. 4-5.</p> <p>CforAT generally supported raising the threshold for ministerial review in the Line Extension Program. Comments on LEP/BAA/BCA Proposals at p. 2, cited in Broadband Decision at p. 7.</p> <p>CforAT recommended that the Commission require that providers' line extensions provide identical service to every location served to ensure that buildout is equitable and low-income communities in California have access to the same speeds as wealthier communities. Comments on LEP/BAA/BCA Proposals at p. 4, cited in Broadband Decision at p. 10.</p> <p>While CforAT did not object generally to the fiscal sponsor or fund request caps, CforAT stated that overly restrictive eligibility requirements might prevent the best-positioned organizations from serving communities and urged the Commission to allow applicants to request that fiscal sponsor or fund request requirements be waived when justified. Comments on LEP/BAA/BCA Proposals at p. 5, cited in Broadband Decision at pp. 11-12. CforAT also argued that the provision that would allow staff to reject an</p>	<p>Consistent with CforAT's support for the staff proposal's revised ministerial review criteria, the Broadband Decision adopts the proposed changes set forth in the staff proposal. Broadband Decision at pp. 7-8.</p> <p>The Broadband Decision "generally agree[s] with CforAT's recommended requirement, and . . . require[s] that providers' line extensions provide equivalent service to every location served." Broadband Decision at pp. 9-11.</p> <p>The Broadband Decision states that "[it] generally agrees with CforAT and TURN regarding the proposed financial conditions for applicant eligibility and ministerial review." Broadband Decision. at p. 12. Consistent with CforAT's recommendation to allow applicants to waive the fiscal sponsor requirement under certain circumstances, the Broadband Decision allows applicants with less than \$50,000 in gross receipts to apply without a fiscal sponsor by demonstrating successful implementation and completion of an at least \$10,000 digital inclusion grant. Broadband Decision at p. 12. Consistent with CforAT's</p>	
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<p>application based on a facial review of the applicant’s liabilities and assets was unnecessary and would raise equity concerns as the Commission has allowed utilities to operate while in bankruptcy. Comments on LEP/BAA/BCA Proposals at pp. 5-6, cited in Broadband Decision at p. 12.</p>	<p>recommendation to allow applicants to waive the fund request cap under certain circumstances, the Broadband Decision allows applicants to request funding above 50 percent of their revenue in applicants that will be considered for approval via the resolution process. <i>Id.</i> at p. 12. Consistent with CforAT’s arguments that a rejection of an application based on facial review of liabilities and assets is unnecessary and raises equity concerns, the Broadband Decision allows applications for applicants whose current liabilities exceed their current assets to receive consideration via the resolution process. <i>Id.</i> at p. 12.</p>	
<p>CforAT recommended that the Commission modify the proposed definitions for “digital literacy” and “broadband access” and supported the proposed definition for “call center.” Comments on LEP/BAA/BCA Proposals at pp. 6-11. Specifically, CforAT detailed the complexity of digital literacy, stating that it encompasses more than possessing specific digital skills and involves understanding the underlying systems and devices and adapting existing skills to new scenarios; CforAT proposed a modified definition that acknowledges the ability to learn new skills and adapt existing skills. Comments on LEP/BAA/BCA Proposals at pp. 8-10, cited in Broadband Decision at p. 13.</p>	<p>While the Broadband Decision did not adopt CforAT’s recommended definition for “digital literacy,” CforAT’s input nevertheless informed the Commission’s deliberation. <i>Broadband Decision at p. 13.</i> Consistent with CforAT’s support for the definition of “call center,” the Broadband Decision adopted the proposed definition. <i>Final Decision at p. 34, Appendix B at p. 4.</i></p>	

<p>While generally supporting the definition for “broadband access,” CforAT recommended that the Commission use the more specific term “Adoption Account broadband access” to reduce confusion with the different definition of broadband access that the Commission uses elsewhere and that the Commission incorporate assistive equipment and technology in the definition because some individuals with disabilities require specialized equipment to access broadband.</p> <p>Comments on LEP/BAA/BCA Proposals at pp. 9-10, cited in Broadband Decision at p. 13.</p> <p>CforAT supported the Staff Proposal’s recommendation for ramp-up reports to be optional in order to reduce the administrative burdens for grantees. CforAT described that small organizations that receive Commission funding for digital literacy have reported more burdensome reporting requirement to justify requests for overhead expenses, reducing time and resources for digital literacy work and other services.</p> <p>CforAT stated that it was informed that the State Controller’s Office directed the implementation of these reporting requirement, though does not have independent verification. CforAT generally raised concerns about increased compliance burdens for grantees that could come at</p>	<p>Consistent with CforAT’s recommendations to modify the proposed definition of “broadband access,” the Broadband Decision clarifies the definition for the purposes of the Adoption Account and acknowledges adaptive equipment and technology. Broadband Decision at pp. 12-13 (“This decision generally agrees with CforAT’s suggestion to limit the risk of confusion for the proposed definition for Broadband Access, and to incorporate assistive equipment and technology to ensure access for people with disabilities. We modify the staff proposal accordingly”); Appendix B at p. 3.</p> <p>Consistent with CforAT’s input in favor of optional ramp-up reports, the Broadband Decision “finds it reasonable to make ramp-up reports optional.” Consistent with CforAT’s discussion of concerns about compliance burdens for grantees, the Broadband Decision allows flexibility for extensions to be authorized to grantees if the grantee communicates an extraordinary need. Broadband Decision at p. 15.</p>	
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<p>the expense of critical digital adoption work by small organizations with limited resources. Comments on LEP/BAA/BCA Proposals at pp. 11-12, cited in Broadband Decision at pp. 14-15.</p>		
<p>CforAT supported the expansion of Consortia eligibility to California Tribes and supported comments filed by Joint RBCs. Comments on LEP/BAA/BCA Proposals at p. 12, cited in Broadband Decision at p. 16.</p>	<p>Consistent with CforAT's recommendation of expanding eligibility, the Broadband Decision adopts the staff proposal's expanded eligibility with clarifications. Broadband Decision at p. 18. Consistent with CforAT's support for comments by the Joint RBCs, the Broadband Decision "acknowledge[s] and agree[s] with Joint RBCs' comments" and states that cultural humility and associated training will support Commission engagement with tribes. Broadband Decision at p. 18.</p>	
<p>CforAT stated that it regularly engages with Joint RBCs and has familiarity with the comments filed by Joint RBCs. Regarding the Consortia Account, CforAT supported the comments of the Joint RBCs, which supported the proposal to expand reimbursable work to BEAD activities including technical assistance to prospective applicants, community engagement, and data collection and mapping. Comments on LEP/BAA/BCA Proposals at p. 12, Broadband Decision at p. 19. <i>See also</i> Joint RBCs' Comments at pp. 3-5.</p>	<p>Consistent with CforAT's support for reimbursement for BEAD activities, the Broadband Decision extended the scope of reimbursable work to include BEAD activities. Broadband Decision at p. 20.</p>	

<p>CforAT stated that it regularly engages with Joint RBCs and has familiarity with the comments filed by Joint RBCs. Regarding the Consortia Account, CforAT supported the comments of the Joint RBCs, which supported making administrative and overhead indirect costs eligible for reimbursement. Comments on LEP/BAA/BCA Proposals at p. 12, cited in Broadband Decision at p. 21. <i>See also</i> Joint RBCs' Comments at pp. 5-6.</p>	<p>Consistent with CforAT's support for permitting reimbursement of administrative and overhead indirect costs, the Broadband Decision authorizes reimbursement of these costs as proposed in the staff proposal. Broadband Decision at p. 21.</p>	
<p>CforAT raised concerns that regional broadband consortia may not be able to obtain approval letters for future broadband deployment activities from Commission staff in the needed time frame to plan and implement these activities and suggested that the Communications Division Director or designee be required to respond to a request for approval within 90 days or 30 days before the next application deadline, whichever is sooner. Comments on Broadband PD at pp. 3-4, cited in Broadband Decision at p. 29.</p>	<p>While the Broadband Decision declines to impose a strict deadline on Commission staff as suggested by CforAT, it demonstrates consideration of CforAT's recommendations and responds to CforAT's concerns about timing by directing staff to be responsive to these requests and to provide updates when requested at the bimonthly meetings between Consortia and Commission staff. Broadband Decision at pp. 29-30.</p>	
<p>CforAT's Comments on the PD supported the PD's changes to the Line Extension Program, Adoption Account, and Consortia Account. Comments on Broadband PD at pp. 1-4. CforAT requested that the</p>	<p>Consistent with CforAT's support for changes to the PD, the Broadband Decision adopts the modifications recommended in comments. Consistent with CforAT's recommendation that the Commission stay any decision on TURN's PFM in this proceeding, the</p>	

Commission stay any decision on TURN's PFM in this proceeding unless, or until, the Commission resolves the issue in the R.20-02-008 proceeding. Comments on Broadband PD at p. 4.	Broadband Decision declines to consider the PFM in this proceeding. Broadband Decision at p. 27. While the Broadband Decision does not cite CforAT's Comments on the PD on these issues, CforAT's input enhanced the record and assisted the Commission's deliberation on these issues, reaching a final result consistent with CforAT's positions.	
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**B. Duplication of Effort (§ 1801.3(f) and § 1802.5):**

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding? <sup>2</sup>	Yes	
b. Were there other parties to the proceeding with positions similar to yours?	Yes	
c. If so, provide name of other parties:	CforAT coordinated with TURN and Joint RBCs. At times, CforAT's positions on specific issues also overlapped with those taken by other parties, including CCSF, CETF, Comcast, and Cox.	
d. Intervenor's claim of non-duplication:	CforAT represents the interests of telecommunications customers with disabilities, who are dependent on reliable and affordable access to telecommunications to support their ability to live independently and to participate in activities of daily living. Because of the unique interests of this customer group, it is important for their perspective to be directly represented.  To the extent that CforAT took similar positions to other parties on issues, this reflects the substantial shared concerns of impacted stakeholders. In these areas of shared concern, CforAT worked to represent the perspective of our constituency of people with disabilities. CforAT has maintained our standard practice of working regularly with other consumer advocates, including coordinating on positions regarding key issues and focusing our priorities to	

<sup>2</sup> The Office of Ratepayer Advocates was renamed the Public Advocate's Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which the Governor approved on June 27, 2018.

Intervenor's Assertion	CPUC Discussion
<p><b>a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?<sup>2</sup></b></p>	Yes
<p>avoid duplication of effort. For example, CforAT engaged with Joint RBCs and supported their comments on issues regarding the Consortia Account, while limiting our separate input on these issues.</p>	

**C. Additional Comments on Part II: *(use line reference # or letter as appropriate)***

#	Intervenor's Comment	CPUC Discussion

**PART III: REASONABLENESS OF REQUESTED COMPENSATION**  
*(to be completed by Intervenor except where indicated)*

**A. General Claim of Reasonableness (§ 1801 and § 1806):**

Intervenor's Assertion	CPUC Discussion
<p><b>a. Intervenor's claim of cost reasonableness:</b></p> <p>The expeditious deployment of fast, reliable, and affordable broadband is a vital mechanism to ensure that underserved and unserved residents of the state have access to the communications services that are necessary for success in today's economy and community. Broadband access is particularly important for CforAT's constituency of people with disabilities and medical vulnerabilities, who tend to be disproportionately low-income and need access to many services and economic activities, particularly as many important functions have primarily moved online, particularly since the shutdowns associated with the Covid-19 pandemic. Our constituency is also generally at heightened risk of severe impacts from Covid and other transmissible illnesses, making it even more important to be able to access goods and services online.</p> <p>In working to address the multitude of issues in this proceeding, CforAT has continued to support broadband deployment goals and ensure access to vital services for all low-income customers. In doing so, CforAT has provided significant consumer benefits. While it is difficult to assign a dollar value to the benefits supported by CforAT, the Commission should</p>	

CPUC Discussion	
<p>consider the importance of high-speed broadband to CforAT's constituency of Californians with disabilities specifically, and low-income and vulnerable customers more generally, as well as the benefits they collectively obtain through the decisions issued in this proceeding. On this basis, the Commission should find that the costs of participation by CforAT are reasonable.</p>	
<p><b>b. Reasonableness of hours claimed:</b></p> <p>As noted above with regard to duplication of effort, CforAT has participated effectively in this portion of the proceeding while maintaining a reasonable commitment of resources and coordinating appropriately with other consumer advocates. CforAT's work in this proceeding was led by Legal Counsel Paul Goodman, who has substantial experience addressing telecommunications issues before the CPUC (first since 2011 with his prior organization, The Greenlining Institute, and with CforAT since 2021). Mr. Goodman took the lead on this proceeding, efficiently continuing his consumer advocacy on behalf of CforAT. Melissa Kasnitz, CforAT's Legal Director, provided limited strategic support and oversight of this work. Mr. Goodman also appropriately delegated specific tasks to CforAT's then Legal Fellow (now Staff Attorney), Rachel Sweetnam, who bills at a substantially lower rate. Work performed by Ms. Sweetnam was appropriately supervised and reviewed by Mr. Goodman to ensure appropriate delegation and overall efficiency of CforAT's efforts.</p>	
<p><b>c. Allocation of hours by issue:</b></p> <p><b>Hours of Paul Goodman, Legal Counsel, 2023:</b></p> <p><b>BPFA:</b> 8.7 hours (100%) The issue area "BPFA" includes time spent related to the Broadband Public Housing Account, including reviewing the staff proposals, drafting comments and reply comments, and conferring with colleagues and other consumer advocates on these issues.</p> <p><b>Hours of Paul Goodman, Legal Counsel, 2024:</b></p> <p><b>Procedural:</b> 0.4 hours (8%) The issue area "Procedural" includes limited time necessary to address important procedural matters in accordance with the Commission's Rules of Practice and Procedure, such as requesting an extension for comment deadlines to facilitate effective participation on substantive matters.</p> <p><b>Coordination:</b> 1.8 hours (36%)</p>	

	CPUC Discussion
<p>The issue area “Coordination” includes time spent coordinating with other consumer advocates to advance shared issues in this proceeding, including meetings, reviewing drafts and providing feedback, and other communications.</p> <p><b>BPHA:</b> 1.5 hours (30%)</p> <p><b>LEP/BAA/BCA:</b> 1.3 hours (26%)</p> <p>The issue area “LEP/BAA/BCA” includes time spent related to the Line Extension Program, Broadband Adoption Account, and Broadband Consortia Account, including reviewing staff proposals, researching issues, and drafting comments.</p> <p><b>Hours of Paul Goodman, Legal Counsel, 2025:</b></p> <p><b>Coordination:</b> 0.4 hours (3.6%)</p> <p><b>LEP/BAA/BCA:</b> 10.6 hours (96.4%)</p> <p><b>Hours of Melissa Kasnitz, Legal Director, 2023:</b></p> <p><b>BPHA:</b> 0.4 (100%)</p> <p><b>Hours of Melissa Kasnitz, Legal Director, 2024:</b></p> <p><b>Coordination:</b> 0.2 hours (100%)</p> <p><b>Hours of Melissa Kasnitz, Legal Director, 2025:</b></p> <p><b>LEP/BAA/BCA:</b> 2 hours (100%)</p> <p><b>Hours of Rachel Sweetnam, Legal Fellow, 2023:</b></p> <p><b>BPHA:</b> 5.2 hours (100%)</p>	

**B. Specific Claim:\***

CLAIMED						CPUC AWARD					
ATTORNEY, EXPERT, AND ADVOCATE FEES											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
Paul Goodman	2023	8.7	\$575	D.24-03-025	\$5,002.50						
Paul Goodman	2024	5	\$625	D.25-04-018	\$3,125.00						
Paul Goodman	2025	11	\$680	Calculated based on escalation of 2024 rate	\$7,480.00						
Melissa Kasnitz	2023	0.4	\$715	D.24-06-018	\$286.00						
Melissa Kasnitz	2024	0.2	\$735	D.24-10-028	\$147.00						
Melissa Kasnitz	2025	2	\$755	D.25-10-060	\$1,510.00						
Rachel Sweetnam	2023	5.2	\$220	D.24-06-022	\$1,144.00						
<i><b>Subtotal: \$ 18,694.50</b></i>						<i><b>Subtotal: \$</b></i>					
OTHER FEES											
Describe here what OTHER HOURLY FEES you are Claiming (paralegal, travel **, etc.):											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
<i><b>Subtotal: \$</b></i>						<i><b>Subtotal: \$</b></i>					
INTERVENOR COMPENSATION CLAIM PREPARATION **											
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$			
Paul Goodman	2026	2	\$340	½ 2025 requested rate	\$ 680.00						
Rachel Sweetnam	2026	12.3	\$137.5	½ 2025 approved rate	\$ 1,691.25						
<i><b>Subtotal: \$ 2,371.25</b></i>						<i><b>Subtotal: \$</b></i>					

CLAIMED			CPUC AWARD	
COSTS				
#	Item	Detail	Amount	Amount
1.				
2.				
<i>Subtotal: \$</i>			<i>Subtotal: \$</i>	
<b><i>TOTAL REQUEST: \$ 21,065.75</i></b>			<b><i>TOTAL AWARD: \$</i></b>	

\*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

\*\*Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

#### ATTORNEY INFORMATION

Attorney	Date Admitted to CA BAR <sup>3</sup>	Member Number	Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation
Melissa W. Kasnitz	1992	162679	No
Paul Goodman	2002	219086	No
Rachel Sweetnam	2023	350075	No

#### C. Attachments Documenting Specific Claim and Comments on Part III: (Intervenor completes; attachments not attached to final Decision)

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	<b>Detailed Time Records (including Merits and work on compensation)</b>

#### D. CPUC Comments, Disallowances, and Adjustments (CPUC completes)

Item	Reason

<sup>3</sup> This information may be obtained through the State Bar of California's website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch>.

Item	Reason

**PART IV: OPPOSITIONS AND COMMENTS**  
**Within 30 days after service of this Claim, Commission Staff**  
**or any other party may file a response to the Claim (see § 1804(c))**

<b>A. Opposition: Did any party oppose the Claim?</b>	
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If so:

Party	Reason for Opposition	CPUC Discussion

<b>B. Comment Period: Was the 30-day comment period waived</b> <b>(see Rule 14.6(c)(6))?</b>	
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If not:

Party	Comment	CPUC Discussion

***(Green items to be completed by Intervenor)***

**FINDINGS OF FACT**

1. **CENTER FOR ACCESSIBLE TECHNOLOGY** [has/has not] made a substantial contribution to D.24-03-041, D.25-11-003.
2. The requested hourly rates for **CENTER FOR ACCESSIBLE TECHNOLOGY's** representatives [, as adjusted herein,] are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses [, as adjusted herein,] are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$\_\_\_\_\_.

## **CONCLUSION OF LAW**

1. The Claim, with any adjustment set forth above, [satisfies/fails to satisfy] all requirements of Pub. Util. Code §§ 1801-1812.

## **ORDER**

1. **CENTER FOR ACCESSIBLE TECHNOLOGY** is awarded \$\_\_\_\_\_.
2. Within 30 days of the effective date of this decision, \_\_\_\_\_ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** the total award. [for multiple utilities: “Within 30 days of the effective date of this decision, ^, ^, and ^ shall pay **CENTER FOR ACCESSIBLE TECHNOLOGY** their respective shares of the award, based on their California-jurisdictional [industry type, for example, electric] revenues for the ^ calendar year, to reflect the year in which the proceeding was primarily litigated. If such data are unavailable, the most recent [industry type, for example, electric] revenue data shall be used.”] Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning [date], the 75<sup>th</sup> day after the filing of **CENTER FOR ACCESSIBLE TECHNOLOGY**’s request, and continuing until full payment is made.
3. The comment period for today’s decision [is/is not] waived.

This decision is effective today.

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

**APPENDIX**  
**Compensation Decision Summary Information**

<b>Compensation Decision:</b>		<b>Modifies Decision?</b>	
<b>Contribution Decision(s):</b>	D.24-03-041, D.25-11-003		
<b>Proceeding(s):</b>	R.20-08-021		
<b>Author:</b>			
<b>Payer(s):</b>			

**Intervenor Information**

<b>Intervenor</b>	<b>Date Claim Filed</b>	<b>Amount Requested</b>	<b>Amount Awarded</b>	<b>Multiplier?</b>	<b>Reason Change/Disallowance</b>
CENTER FOR ACCESSIBLE TECHNOLOGY	January 23, 2026	\$ 21,065.75		N/A	

**Hourly Fee Information**

<b>First Name</b>	<b>Last Name</b>	<b>Attorney, Expert, or Advocate</b>	<b>Hourly Fee Requested</b>	<b>Year Hourly Fee Requested</b>	<b>Hourly Fee Adopted</b>
Paul	Goodman	Attorney	\$575	2023	
Paul	Goodman	Attorney	\$625	2024	
Paul	Goodman	Attorney	\$680	2025	
Melissa	Kasnitz	Attorney	\$715	2023	
Melissa	Kasnitz	Attorney	\$735	2024	
Melissa	Kasnitz	Attorney	\$755	2025	
Rachel	Sweetnam	Attorney	\$220	2023	
Rachel	Sweetnam	Attorney	\$275	2025	

**(END OF APPENDIX)**