



ALJ/KWZ/abb 2/19/2026

FILED

02/19/26

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

A2505017

Application of THE 20 LLC for
Section 1013 Registration

Application 25-05-017

**ADMINISTRATIVE LAW JUDGE'S SECOND RULING
DIRECTING FILING OF ADDITIONAL INFORMATION
WITHIN 10 DAYS AND SETTING STATUS CONFERENCE**

This ruling directs The 20 LLC to file and serve a response within 10 days of the date of this ruling. Additionally, this ruling sets a status conference for March 4, 2026, at 11 a.m. for The 20 LLC to provide further information on their application and supporting documentation as necessary.

1. Background

The 20 LLC (Applicant) filed Application (A.) 25-05-017 requesting a registration license to provide non-facilities-based interconnected Voice over Internet Protocol (VoIP) service in California pursuant to Public Utilities Codes section 1013 that was subsequently converted to an application a Certificate of Public Convenience and Necessity (CPCN) pursuant to section 1001. On October 28, 2025, the assigned Administrative Law Judge (ALJ) issued a ruling direction the Applicant to file an amended application. On November 20, 2025, a prehearing conference was held during which the Applicant and ALJ discussed the outstanding information and how to make a formal filing at the California Public Utilities Commission (Commission). On November 21, 2025, the Applicant filed an amended application. The assigned Commissioner issued the Scoping Memo and Ruling on February 10, 2026.

2. Discussion

The amended application in the docket of A.25-05-017 is still incomplete. The Commission requires the following information to be formally filed:

1. Appendix A to the amended application, section 1.c.
The Applicant provided a Certificate of Good Standing Status certified by the California Secretary of State for The 20 MSP LLC. The Applicant should provide adequate detail about the relationship between The 20 LLC and The 20 MSP LLC per number 2 below and provide a Certificate of Good Standing Status by the California Secretary of State for The 20 LLC.
2. Regarding The 20 LLC corporate structure, provide:
 - a. a complete list of affiliated companies, including but not limited to The 20 MSP Group LLC and Roland Technology Group;
 - b. a chart depicting the corporate structure including corporate parent companies and holding companies, affiliates, and subsidiaries.
 - c. The relationship of Cobalt IT to the Applicant. At the prehearing conference, Applicant stated The 20 LLC acquired Cobalt IT. On page 16 of The 20 LLC (Attachment 8 to the amended application) there is a statement "The Company acquired substantially all assets used in the business of Cobalt IT Inc., on April 1, 2025." Describe the Cobalt IT Inc. assets acquired by The 20 LLC on April 1, 2025. If Cobalt IT customer contracts were acquired, explain whether and how Cobalt IT notified its customers of the acquisition and the corporate provider name that the customers are receiving service under since April 2025.
 - d. According to Commission records, Cobalt IT, Inc. had been operating in California and held an informal registration as utility type DVS and utility ID number 1334. Pursuant to Commission Decision

24-11-003 and Pub. Util. Code Section 1013, Cobalt IT was migrated to formal operating authority as a non-facilities-based Digital Voice Fixed (DVF) utility type in 2025. As required, Cobalt IT filed a performance bond with the Commission and until recently, continued remitting public purpose program surcharges.

Describe the status of Cobalt IT with the Commission currently and provide supporting details to Mr. Pecot's statement at the prehearing conference regarding compliance with the surcharge reporting and remitting obligations.

- a. Appendix D to Section 8 of the application form did not provide the resume for Tim Conkle, who is listed as the CEO of The 20 LLC. Provide **all resumes** for each personnel identified listing all employment for each officer, director, partner, agent, or owner (directly or indirectly) of more than 10% of Applicant, or any person acting in such capacity whether or not formally appointed.
- b. Appendix E to Section 9 of the application form demonstrating financial liquidity of a minimum of \$25,000 requires bank statements which have not been submitted.

3. Status Conference Access

The status conference will be on Webex, accessible through an internet link. Representatives of The 20 LLC shall participate with audio and visual access enabled.

PHC link:	https://cpuc.webex.com/cpuc/j.php?MTID=m363b3c2706c38f6d574292c00039d5e3
Meeting number (access code):	2482 931 8082
Meeting password:	rK7g2vZMHV7
Audio access only:	+1-855-282-6330 United States Toll Free +1-415-655-0002 United States Toll

If there are clarifications needed regarding the required information, Applicant may contact the assigned proceeding analyst Marianne Divina at Marianne.divina@cpuc.ca.gov with a copy to the service list. Within 10 days of the date of this ruling, the Applicant shall provide the additional information as directed herein. Failure to provide the additional information may result in dismissal of A.25-05-017 for failure to prosecute. Applicant's filing must be titled "Response to Administrative Law Judge's Second Ruling."

IT IS SO RULED.

Dated: February 19, 2026, at San Francisco, California.

/s/ CAMILLE WATTS-ZAGHA
Camille Watts-Zagha
Administrative Law Judge