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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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R2406012

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 ON COMMENTS TO JOINT
PROPOSAL OF AT&T CALIFORNIA AND CAL ADVOCATES**

This Ruling sets aside submission for the purpose of allowing parties to comment on a joint proposal offered by AT&T California and the California Public Utilities Commission's (Commission) Office of Public Advocates (Cal Advocates).¹

By April 10, 2026, AT&T California and Cal Advocates are ordered to respond to the questions and issues raised in Section 3 of this Ruling. After a more complete Joint Proposal is filed and served, interested parties may file and serve Opening Comments by April 24, 2026. The deadline for Reply Comments is April 31, 2026.

1. Joint Proposal

The Joint Proposal appears in Appendix A of AT&T California's Reply Comments and in Appendix A of Cal Advocates' Reply Comments, both filed and served on February 13, 2026. The Joint Proposal was not filed as a settlement, consistent with Article 12 of the Commission's Rules of Practice and Procedure.

¹ On February 13, 2026, AT&T California and Cal Advocates offered a "Joint Proposal for Fiber Deployment Commitment for Carrier of Last Resort (COLR) Relief and Basic Service Discontinuance" (Joint Proposal).

Nonetheless, the Joint Proposal introduces potentially new information or recommendations that all parties may not yet have been able to comment on. Thus, the record appears to be incomplete, and AT&T California and Cal Advocates are asked to expand upon their Joint Proposal.

2. Revised Schedule

The Assigned Commissioner's Scoping Memo and Ruling determined that this proceeding would stand submitted after the filing and serving of reply comments to a Staff Proposal, unless the Assigned Commissioner or Assigned Administrative Law Judge (ALJ) determine additional information is needed to complete the record.² February 13, 2026 was the deadline for parties to file and serve comments and the submission date for this proceeding.

The Assigned Commissioner's Scoping Memo and Ruling allows for modifications to the schedule, "as required to promote the efficient and fair resolution of the rulemaking."³ Relying on that authority, this Ruling sets aside submission to allow AT&T California and Cal Advocates to offer additional details regarding their Joint Proposal, and to then allow parties the opportunity to comment on the more detailed Joint Proposal.

3. Questions for AT&T California and Cal Advocates

By April 10, 2026, AT&T California and Cal Advocates are asked to answer the questions listed below. The preference is a joint response. However, in the event a joint answer to a specific question is not possible, but an individual party has a position on the question, the position should still be included in the joint response.

² Assigned Commissioner's Scoping Memo and Ruling, issued February 4, 2025, at 9.

³ *Id.*, at 8.

1. The Joint Proposal uses the term “eligible relief zone.” Please define that term, including the size of the relief zone and number of locations expected to be in a relief zone.
2. The Joint Proposal requires that 20 percent of locations of an “eligible relief zone” will have the existing COLR commit to building out new fiber connections to the locations. Please explain how the remaining 80 percent of locations in the “eligible relief zone” will be treated.
3. In total, how many housing units in California qualify as being in an “eligible relief zone?”
4. Do the 20 percent of locations where the COLR commits to deploying fiber include locations in California that the COLR has already started to build to, or to which the COLR already plans to build fiber? For example, in Resolution T-17880, AT&T is required to invest \$71 million to deploy fiber-optic infrastructure in Priority Investment Areas as part of service quality Corrective Action Plan. Will existing AT&T commitments count towards the Joint Proposal’s 20 percent commitment or is the 20 percent fiber commitment above and beyond any current AT&T deployment plans and commitments?
5. Do the 20 percent of locations include locations where the COLR currently has fiber deployed?
6. What other criteria will be used to determine the list of locations that comprise the 20 percent of locations?
7. Does the fiber commitment include 20 percent of locations not currently receiving 1 gigabit per second in the relief area, or 20 percent of all locations?
8. Cal Advocates is asked to explain the following statement on page 4 of its Reply Comments: “...a COLR relief zone could expand depending on the progress made towards expanding fiber networks in the Broadband, Equity, Access, and Deployment (BEAD) and California Advance

Services Fund (CASF) programs.”⁴ Please explain what “expand” means in the context of the sentence.

9. Cal Advocates is asked to explain the following statement on page 4 of its Reply Comments: “Households already connected to fiber by the COLR would also be considered eligible for relief, and the COLR would be required to offer LifeLine in the post-transition environment.”⁵ Does this mean that any areas that have fiber already deployed by the COLR, regardless of the number of wireline providers separate from COLR, should be relieved from COLR obligations?
10. Cal Advocates is asked to provide all calculations that support the statement that the Joint Proposal will result in “.. more than 1 million fiber lines to be deployed throughout the state over ten years.”⁶
11. In the event 20 percent of all locations in an eligible relief zones adds up to more than 1 million locations, how do AT&T California and Cal Advocates propose the Commission address this circumstance in a manner that is consistent with the Joint Proposal?
12. Does the Joint Proposal include interim milestones across 10 years to track progress on the commitment of 1 million new fiber connections in California?
13. Please explain the Joint Proposal’s commitment to LifeLine participation. Please include information on the specifics of the Joint Proposal such as whether AT&T participation in the California LifeLine program will include the offering of broadband service. Please also specify if the offering of California LifeLine will be provided to 100 percent of all locations in a “relief zone” or just 20 percent of the locations. Please also specify how long the COLR will be

⁴ Cal Advocates, Reply Comments on Staff Proposal, filed February 13, 2026, at 4.

⁵ *Ibid.*

⁶ *Id.*, at 5.

required to offer California LifeLine and when the timing starts.

14. What enforcement mechanisms or penalties apply if deployment targets are not met?
15. Please provide analysis showing where relief zones overlap with Environmental and Social Justice (ESJ) communities.⁷
16. Footnote 20 of Cal Advocates' Reply Comments cites to a report on deployment costs prepared by the Fiber Broadband Association. The Joint Proposal states, "Based on industry cost modeling data, \$2,000 per household would exceed the expected average cost per household of connecting fiber to homes within an eligible relief zone." Please provide documentation and underlying data that informs the \$2,000 metric.
17. The Joint Proposal proposes a 5 household relief for 1 household fiber connection. Please explain how the joint proposers conclude this exchange of obligation for deployment benefits all Californians. What protections are in place to ensure the new connections will prioritize ESJ, low-income, and or historically disadvantaged communities?
18. Both AT&T and Cal Advocates are directed to provide a detailed overview of the legal authorities the Commission has to mandate the requirements contained in the Joint Proposal.

4. Questions for Parties

Parties may comment on any portion of the Joint Proposal. However, parties are asked to address specifically the questions listed below.

1. Should the Commission adopt the Joint Proposal? Please explain your answer.

⁷ The Commission's ESJ Action Plan can be found via this URL: <https://www.cpuc.ca.gov/news-and-updates/newsroom/environmental-and-social-justice-action-plan>.

2. If the Commission were to adopt this Joint Proposal, what would that mean for the other COLRs and their basic service customers?
3. What are the potential effects of this proposal on affordability of modernized essential service in areas outside the relief zones?

After a more complete Joint Proposal is filed and served, interested parties may file and serve Opening Comments by April 24, 2026. The deadline for Reply Comments is April 31, 2026.

IT IS RULED that:

1. The record of this proceeding is re-opened to allow parties to comment on a joint proposal offered by AT&T California and the California Public Utilities Commission's Office of Public Advocates.
2. By April 10, 2026, AT&T California and Cal Advocates are ordered to respond to the questions and issues raised in Section 3 of this Ruling.
3. After a more complete Joint Proposal is filed and served, interested parties may file and serve Opening Comments by April 24, 2026.
4. The deadline for Reply Comments is April 31, 2026.

Dated March 25, 2026, at San Francisco, California.

/s/ THOMAS J. GLEGOLA

Thomas J. Glegola
Administrative Law Judge