

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



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Order Instituting Rulemaking Proceeding to  
Consider Changes to Licensing Status and  
Obligations of Interconnected Voice over Internet  
Protocol Carriers.

Rulemaking 22-08-008  
(Filed August 25, 2022)

**REPLY COMMENTS OF PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T  
CALIFORNIA (U 1001 C) AND AT&T ENTERPRISES, LLC (U 5002 C) ON THE PROPOSED  
DECISION UPDATING REGULATORY FRAMEWORK FOR TELEPHONE  
CORPORATIONS PROVIDING INTERCONNECTED VOICE OVER INTERNET  
PROTOCOL SERVICE AND CLOSING PROCEEDING**

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Dated: June 2, 2026

Pursuant to Rule 14.3 of the California Public Utilities Commission’s (Commission) Rules of Practice and Procedure, Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) and AT&T Enterprises, LLC (U 5002 C) (collectively, AT&T) respectfully submit these reply comments on the Proposed Decision Updating Regulatory Framework for Telephone Corporations Providing Interconnected Voice Over Internet Protocol Service and Closing Proceeding (Proposed Decision), issued May 8, 2026.<sup>1</sup>

## **I. INTRODUCTION**

AT&T appreciates this opportunity to reply to comments filed in response to the Proposed Decision. AT&T files these reply comments to: (1) urge the Commission to modify the Proposed Decision to conclude it is unnecessary for providers with general operating authority to file a Tier 1 advice letter; and (2) request that the Commission either eliminate the new TUFFS reporting requirement or delay its implementation.

## **II. THE PROPOSED DECISION SHOULD BE REVISED TO REFLECT THAT PROVIDERS WITH GENERAL OPERATING AUTHORITY ARE NOT REQUIRED TO FILE A TIER 1 ADVICE LETTER TO ADD THE DVF UTILITY TYPE.**

Frontier/Verizon<sup>2</sup> and Consolidated Communications<sup>3</sup> state in their opening comments that it is unnecessary for providers with general operating authority to file a Tier 1 advice letter

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<sup>1</sup> *Proposed Decision Updating Regulatory Framework for Telephone Corporations Providing Interconnected Voice Over Internet Protocol Service and Closing Proceeding (Proposed Decision), Rulemaking (R.) 22-08-008 (May 8, 2026).*

<sup>2</sup> *Opening Comments of Frontier California Inc. (U 1002 C), Citizens Telecommunications Company of California Inc. (U 1024 C), Frontier Communications of the Southwest Inc. (U 1026 C) [ ] and MCIMetro Access Transmission Services, LLC (U 5253 C) [ ] on Proposed Decision Updating Regulatory Framework for Telephone Corporations Providing Interconnected Voice Over Internet Protocol Service and Closing Proceeding (Frontier/Verizon Comments), R.22-08-008 at 1-3 (May 28, 2026).*

<sup>3</sup> *Comments of Consolidated Communications of California Company, LLC (U 1015 C) Fidium Enterprise Services, LLC (U 7261 C) on Proposed Decision of Commissioner Harada (Consolidated Comments), R.22-08-008 at 1 (May 28, 2026).*

to add the DVF utility type. AT&T agrees the Tier 1 advice letter requirement is unnecessary. But despite its position on this issue, Consolidated Communications raises no objection to the Tier 1 advice letter requirement believing it “is efficient and straightforward, so it can be implemented without unreasonable burden.”<sup>4</sup> Consolidated Communications fails to recognize the legal implications. Through the Tier 1 advice letter process or a subsequent CPCN application process, the vested franchise rights of providers could be limited or modified and for that reason, such a requirement should be rejected.<sup>5</sup>

Frontier/Verizon offers other compelling arguments as to why the Tier 1 advice letter filing requirement is unnecessary. For example, in response to the Proposed Decision’s claim that the requirement supports the Commission’s competitive neutrality policy objective,<sup>6</sup> Frontier/Verizon argues the DVF designation is unnecessary to achieve that objective because it does not change “the providers’ regulatory authority or the Commission’s asserted regulatory jurisdiction.”<sup>7</sup> Frontier/Verizon also points out that providers with general operating authority offering fixed iVoIP service “are subject to the same ‘mandates regarding universal service, E911, and market competition[.]’”<sup>8</sup> Additionally, Frontier/Verizon observes that the Proposed Decision fails to establish that customers lack information on the services providers offer<sup>9</sup> in

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<sup>4</sup> Consolidated Comments at 1.

<sup>5</sup> See *Comments of Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) and AT&T Enterprises, LLC (U 5002 C) on the Proposed Decision Updating Regulatory Framework for Telephone Corporations Providing Interconnected Voice Over Internet Protocol Service and Closing Proceeding* (AT&T Comments), R.22-08-008 (May 28, 2026).

<sup>6</sup> Proposed Decision at 12.

<sup>7</sup> Frontier/Verizon Comments at 2.

<sup>8</sup> *Id.* (quoting Proposed Decision at 12-13, 40); see also D.24-11-003, *Decision Establishing Regulatory Framework for Telephone Corporations Providing Interconnected Voice Over Internet Protocol Service*, R.22-08-008 at 5 (Nov. 12, 2024).

<sup>9</sup> Frontier/Verizon Comments at 3.

response to the Proposed Decision’s claim that the DVF designation will help protect consumers by providing more transparency on service offerings.<sup>10</sup> For these reasons, and for the legal reasons raised in AT&T’s opening comments,<sup>11</sup> the Proposed Decision should conclude that providers holding general operating authority pursuant to a statutory franchise are not required to file a Tier 1 advice letter to add the DVF utility type.

### **III. THE PROPOSED DECISION SHOULD BE MODIFIED TO ELIMINATE THE NEW TUFFS REPORTING REQUIREMENT.**

The Proposed Decision states, “[e]ffective upon issuance of this decision, all wireline telephone corporations must separately report on a monthly basis the total access lines for offering fixed interconnected VoIP services and wireline services under the corresponding utility ID for the carrier.”<sup>12</sup> Regarding this new TUFFS reporting requirement, the Proposed Decision only includes one finding of fact, which provides “[t]he benefits of identifying the pace of transition from legacy voice provision to IP-enabled voice services outweigh any technical burdens.”<sup>13</sup> The Proposed Decision, however, fails to explain how this narrow slice of data would meaningfully inform the Commission's understanding of the broader technology transition.

As Frontier/Verizon points out, there are other alternatives to legacy voice services aside from fixed iVoIP services;<sup>14</sup> therefore, tracking iVoIP access line data is not a true measure of the transition from legacy voice services to other voice services. It is also not a true measure of the

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<sup>10</sup> Proposed Decision at 13.

<sup>11</sup> AT&T Comments at 2-9.

<sup>12</sup> Proposed Decision at 16.

<sup>13</sup> *Id.* at 40.

<sup>14</sup> Frontier/Verizon Comments at 3.

transition from legacy voice services to IP-enabled voice services because fixed iVoIP service is only one type of IP-enabled voice service providing an incomplete and inaccurate picture of the transition to IP-enabled voice services. Moreover, as Frontier/Verizon notes, the Commission can obtain iVoIP access line data through other means such as through targeted data requests.<sup>15</sup> The TUFFS reporting requirement is therefore unnecessary and unjustified, and the Commission should eliminate the separate TUFFS reporting requirement from the Proposed Decision.

**IV. ALTERNATIVELY, THE COMMISSION SHOULD DELAY THE EFFECTIVE DATE FOR THE NEW TUFFS REPORTING REQUIREMENT.**

If the Commission nevertheless adopts the TUFFS reporting requirement, AT&T supports Frontier/Verizon's request for a delay in the implementation of this new reporting requirement.<sup>16</sup> The Proposed Decision currently provides that the requirement is "[e]ffective upon issuance of this decision,"<sup>17</sup> which would give wireline providers no lead time to implement the necessary changes. The Proposed Decision has no analysis of the time providers would need to modify their reporting systems or any findings that immediate implementation is reasonable. This is legal error. To address this, AT&T agrees with Frontier/Verizon that "the Commission should clarify this new requirement will apply no sooner than the March 15, 2027 TUFFS reporting[.]"<sup>18</sup>

**V. CONCLUSION**

For the foregoing reasons, AT&T respectfully urges the Commission to modify the Proposed Decision to: (1) conclude that providers holding general operating authority pursuant to

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<sup>15</sup> *Id.* at 3-4.

<sup>16</sup> *Id.* at 4.

<sup>17</sup> Proposed Decision at 16.

<sup>18</sup> Frontier/Verizon Comments at 4.

a statutory franchise are not required to file a Tier 1 advice letter to add the DVF utility type or file a CPCN application to expand their authority to include fixed iVoIP service; and (2) eliminate the requirement that all wireline providers separately report their fixed iVoIP access lines in TUFFS on a monthly basis. Alternatively, the Proposed Decision should delay the effective date for the new TUFFS reporting requirement to no sooner than March 15, 2027 to allow wireline providers time to implement the necessary changes.

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