

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



Order Instituting Rulemaking Proceeding to  
Consider Service Quality Rules for Wireless  
Carriers.

R. 26-02-017

**FILED**

07/02/26

04:59 PM

R2602017

**T-MOBILE WEST LLC'S MOTION TO REPLACE CONFIDENTIAL  
ATTACHMENT DIR 1-1 PREVIOUSLY SUBMITTED IN RESPONSE TO  
THE INFORMATION REQUESTS IN THE ORDER INSTITUING  
RULEMAKING**

**PUBLIC VERSION  
[WITH CONFIDENTIAL ATTACHMENT DIR1-1\_050925 - REDACTED]**

Leon M. Bloomfield  
Law Offices of Leon M. Bloomfield  
1970 Broadway, Suite 1100  
Oakland, CA 94612  
Telephone: (510) 282.6240  
Email: [lmb@wblaw.net](mailto:lmb@wblaw.net)

Attorney for T-Mobile West LLC

Dated: July 2, 2026

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

Order Instituting Rulemaking Proceeding to  
Consider Service Quality Rules for Wireless  
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R. 26-02-017

**T-MOBILE WEST LLC'S MOTION TO REPLACE CONFIDENTIAL ATTACHMENT  
DIR 1-1 PREVIOUSLY SUBMITTED IN RESPONSE TO THE INFORMATION  
REQUESTS IN THE ORDER INSTITUING RULEMAKING**

Pursuant to Commission Rule of Practice and Procedure 11.1, T-Mobile West LLC dba T-Mobile (U-3056-C), on behalf of itself and its affiliates (collectively referred to as "T-Mobile"),<sup>1</sup> submits this Motion to Replace Confidential Attachment DIR 1-1 Previously Submitted in its April 1, 2026 Response to the Information Requests in the OIR referenced above.<sup>2</sup>

In particular, T-Mobile recently became aware that in its April 1, 2026 Response to Information Request DIR 1-1,<sup>3</sup> it inadvertently attached a copy of Mr. Consalvo's July 2, 2025

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<sup>1</sup> T-Mobile West's affiliates include Assurance Wireless USA, L.P. dba Assurance Wireless (U-4327-C), MetroPCS California, LLC dba Metro by T-Mobile (U-3079-C), Mint Mobile, LLC dba Mint Mobile (U-4532-C), Sprint Spectrum LLC dba T-Mobile (U-3062-C) and UVNV, LLC dba Ultra Mobile (U-4441-C). All of these entities are separately registered wireless carriers that utilize the same network and are otherwise wholly owned subsidiaries of T-Mobile USA, Inc.

<sup>2</sup> The verification/declaration associated with Confidential Attachment DIR 1-1\_050925 is included as Attachment A.

<sup>3</sup> Declaration Information Request 1-1 provided as follows:

*Declarations filed with the May 12, 2025 Motion to Reopen and Supplement the Record of R.22-03-016:*

- a. Declaration of Sinan Akkaya;*
- b. Declaration of John Consalvo;*
- c. Declaration of Lowell Handy;*
- d. Declaration of Joel Rioux;*
- e. Declaration of Connie Chaffins; and*
- f. Declaration of Brian Williams.*

Declaration (submitted in support of the July 8, 2025 Motion to Reopen and Supplement the Record of in R.22-03-016) instead of a copy of his May 9, 2025 Declaration (submitted in support of the May 12, 2025 Motion to Reopen and Supplement the Record of R.22-03-016) in Appendix B. To be clear, the July 2, 2025 Consalvo Declaration was - appropriately - submitted as Confidential Attachment DIR 2-1 in that April 1, 2026 Response. However, as noted above, it was also erroneously included as Attachment DIR 1-1 instead of the May 9, 2025 Consalvo Declaration.

In order to correct the inadvertent inclusion of the July 2, 2025 Consalvo Declaration in Response to DIR 1-1, a copy of the May 9, 2025 Consalvo Declaration is attached to this Amendment as “Confidential Attachment DIR 1-1\_050925”.<sup>4</sup>

T-Mobile apologizes for any inconvenience caused by the inadvertent inclusion of the July 2, 2025 Consalvo Declaration instead of the May 9, 2025 Declaration as Confidential Attachment DIR 1-1 in its April 1, 2026 Response to the Information Requests.

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<sup>4</sup> A copy of Confidential Attachment DIR 1-1\_050925 is included with this Motion as Attachment B.

T-Mobile notes that the redacted copy of DIR 1-1\_050925 provided with the public version of this Motion has been revised to address the concerns noted with the original redacted copies as set forth in the ALJ’s Ruling Denying the Wireless Parties’ Motions to File Under Seal (August 27, 2025). *See also* T-Mobile Motion to File Under Seal filed concurrently with this Response.



# **ATTACHMENT A**

## **CONSALVO DECLARATION AND VERIFICATION**

## Attachment A

### Consalvo Declaration and Verification of Confidential Attachment DIR 1-1\_050925

I, John Consalvo, declare as follows:

1. I am a Senior Director of Care Planning and Strategy for T-Mobile USA, Inc., the parent company of T-Mobile West LLC dba T-Mobile (U-3056-C); Assurance Wireless USA L.P. dba Assurance (U-4327-C); MetroPCS California, LLC dba Metro by T-Mobile (U-3079-C); Mint Mobile, LLC dba Mint Mobile (U-4532-C); Sprint Spectrum, LLC dba T-Mobile (U-3062-C); and UVNV, LLC dba Ultra Mobile (U-4441-C) (collectively “T-Mobile”).
2. I have reviewed the information provided in Confidential Attachment DIR 1-1\_050925 (both in the redacted and unredacted formats) and verify that the information provided in the Confidential Attachment identified above, is true and accurate based on my own knowledge, except as to matters which are based on information or belief, and as to those matters I believe them to be true.<sup>1</sup>
3. The Confidential Attachment is a copy of the May 9, 2025 Declaration I executed in the context of what I understood to be a proceeding then pending at the California Public Commission.
4. The information marked as confidential in the redacted version of my Declaration to be included with this Motion consists of estimates of the costs associated with attempting to comply with proposed customer care performance metrics, including estimates of the additional full-time equivalent (“FTE”) staffing required to meet such standards.<sup>2</sup>
5. These estimates were developed for the first of two separate – but related - sets of proposed customer service rules (the second set of rules was a modification of the first set as indicated in my July 2, 2025 Declaration) and reflect internal analyses of the potential costs to the Company’s customer care organization of trying to comply with each set of requirements.

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<sup>1</sup> I have been informed that T-Mobile became aware that in its April 1, 2026 Response to Information Request DIR 1-1,<sup>1</sup> it inadvertently attached a copy of my July 2, 2025 Declaration (submitted in support of the July 8, 2025 Motion to Reopen and Supplement the Record of in R.22-03-016) instead of a copy of my May 9, 2025 Declaration (submitted in support of the May 12, 2025 Motion to Reopen and Supplement the Record of R.22-03-016) as Confidential Attachment DIR 1-1 in Appendix B.

<sup>2</sup> I am informed and believe that the redactions in this Attachment has been limited to be more consistent with guidance provided by the Administrative Law Judge in the prior proceeding.

6. The estimates incorporated proprietary inputs, including customer contact volumes, handling times, service channel mix, staffing ratios, productivity assumptions, and operational workflows specific to the Company.
7. The projected FTE count reflected confidential workforce planning models that are not publicly disclosed and are based on Company-specific data and assumptions regarding customer behavior and service demand.
8. The resulting cost estimate reflected internal calculations of labor costs, operational scaling, and resource allocation associated with compliance, and is not publicly available.
9. This information cannot be replicated from publicly available sources because it relies on internal data, proprietary modeling, and Company-specific operational assumptions.
10. The projected FTE count and resulting cost estimate are valuable to the company as they reflect internal data regarding the Company's customer care base. Disclosure of these estimates would reveal sensitive information regarding the Company's cost structure, staffing strategy, and approach to managing customer care operations under regulatory constraints, providing competitors with insight that is not otherwise available.
11. In addition, disclosure would enable knowledgeable third parties to potentially reverse-engineer key aspects of the Company's operations, including cost per contact, staffing efficiency, and service delivery models. Competitors could use this information to refine targeting, pricing, staffing, and marketing strategies, thereby causing competitive harm to the Company.
12. While the Company recognizes the general public interest in transparency in regulatory proceedings, I am not aware of any way in which the specific information at issue here would meaningfully enhance public understanding of the issues beyond what is already publicly available.
13. The Company takes reasonable and fulsome measures to maintain the confidentiality of this information, including restricting access internally to personnel with a need to know or outside regulatory counsel; it is not made publicly available in any forum of which I am aware.
14. I have been authorized by Chuck Lamb, Vice President of Customer Care Planning and Strategy for T-Mobile USA, Inc., to execute this verification/declaration on behalf of T-Mobile West LLC dba T-Mobile (U-3056-C); Assurance Wireless USA L.P. dba Assurance (U-4327-C); MetroPCS California, LLC dba Metro by T-Mobile (U-3079-C); Mint Mobile, LLC dba Mint Mobile (U-4532-C); Sprint Spectrum, LLC dba T-Mobile (U-3062-C); and UVNV, LLC dba Ultra Mobile (U-4441-C).



# **ATTACHMENT B**

**Confidential Attachment DIR 1-1\_050925**

May 12, 2025 Motion to Reopen the Record - Declaration of John Consalvo

## DECLARATION OF JOHN CONSALVO

I, John Consalvo, declare as follows:

1. I am a Senior Director, Care Planning and Strategy for T-Mobile US, Inc. and have been with T-Mobile for over 20 years in various leadership positions regarding key customer care functions including Demand Planning, Forecasting & Analysis, Segmentation Optimization, Contact Insights & Analytics, and Data Enablement.
2. My responsibilities include, but are not limited to leading the customer care team which is focused on planning, analysis, and otherwise for generating enterprise-wide demand forecasts rooted in advanced analytics and multi-source insights.
3. I submit this Declaration in Support of the Comments I understand will be filed by CTIA and T-Mobile, in response to a Proposed Decision issued by the California Public Utilities Commission which would apparently mandate, among other things, various requirements as part of what is referred to as the “Customer Service Standard” on telecommunications companies including wireless companies like T-Mobile.
4. I have reviewed the Proposed Decision and Appendix A (General Order 133-E), and in particular the sections which I understand refer to the Customer Service Standard (i.e., Section 18 of the Proposed Decision and Section 2.5 of Appendix A).
5. Although I am not an attorney, my understanding is that these new Customer Service Standards – if adopted - would require, among other things:
  - 24-hour customer care number with live representatives available to respond to customer inquiries at least during regular business hours (i.e., between 8:00 am – 5:00 pm from Monday to Friday).
  - An obligation to respond to customer inquiries left outside those regular business hours by the next business day.
  - An obligation for customer care representatives to answer 90% of all calls made during regular business hours within 60 seconds.<sup>1</sup>

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<sup>1</sup> This mandated answering time is reflected in the proposed version of General Order 133-E attached to the Proposed Decision (“PD”). See PD, Appendix A (proposed GO 133-E, (§ 2.5(a)(ii)). Perhaps due to an error, the Proposed Decision itself seems to also indicate that the answer time may be 30, rather than 60 seconds. See PD at p. 141. Consistent with the proposed rule in GO 133-E, however, I assume in this declaration that the intended requirement is 60 seconds. If, however, the Commission were to ultimately adopt a requirement to answer

- I assume that means a 60 second average speed of answer “ASA” time as that metric is generally measured by customer care.
  - An obligation to provide a so-called “chat component” on the company webpage; and
  - For those customers who chose to use a chat option (or what is referred to in the Customer Service Standard as other “automated systems”) to resolve their inquiry, the carriers “must provide an option to speak to a trained company representative within the first ten seconds of connecting to customer service.”
6. I recognize that there are other obligations proposed under these Customer Service Standards, as well as other requirements contained in Appendix A to the Proposed Decision, but my focus has been on the items listed above.
7. In particular, I have attempted to provide a preliminary estimate of the additional costs of revamping T-Mobile’s customer care organization to try and meet the particular obligations noted above in Paragraph 5. As described below, the projected compliance burden of the proposed customer service rules is extraordinarily high.

**[BEGIN CONFIDENTIAL]**

8. In sum, my preliminary - and conservative - estimate of the annual costs to revamp T-Mobile’s customer care organization to try and meet the proposed mandates identified above is **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]** per year and the addition of approximately **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]** full-time equivalent (“FTE”) personnel including care representatives and support staff.
9. Even with these expenditures, it is not possible to ensure 100% compliance.
10. I would note the following about the estimate noted above:
- Given that T-Mobile’s current customer care system (which we consider to be the industry leader as recognized by numerous industry awards), is not designed to operate on a state-specific basis, I proceeded on the basis that we would have to retool our entire system nationwide to meet these obligations. To do otherwise would be impractical, inconsistent with the manner in which our customer care organization is built, create inconsistent customer experiences and otherwise be harmful to the consumers in my view.

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calls within just 30 seconds – half that time – the resulting compliance costs would undoubtedly be substantially higher than those projected herein.

- Although T-Mobile’s customer care currently operates, in general, from 4:00 a.m. – 12:00 a.m. seven days a week, I have prepared the estimate assuming customer care would be available 24/7. This avoids the need to create new systems which allow a customer who calls in after hours to somehow leave a message that would need to be responded to the next business days. T-Mobile does not have such a system currently.
- I prepared this estimate assuming that we would continue to focus on providing customer care using U.S. based facilities and personnel. I have not looked at the costs of using off-shore customer care. I also did not take into account director-level positions that would be required to add this type of personnel.
- The estimate includes primarily the costs of additional personnel that we project would be required to meet the proposed ASA of 60 seconds for 90% of calls standard. We calculated this estimate based on the costs associated with our current staffing levels and the resulting ASA’s and what would be required to meet this new standard.<sup>2</sup>
- The estimate is based on meeting this standard for all postpaid and prepaid customers.
- For purposes of preparing this estimate, I assumed that the term “automated system” in the context of the “10 second” mandate would include both our current chat option (which we refer to as “OVA” otherwise known as an Open Virtual Application) and our current interactive voice response (“IVR”) system.
- I also assumed for these purposes that we would do the following in terms of the “10 second” mandate described above:
  - For customers who choose our current automated chat function, we would provide them with a prompt within 10 seconds that would inform them that they could continue with a live representative chat if they preferred.
  - For customers who call into customer care IVR, we would provide them with an audible prompt within 10 seconds that would inform them they could transfer to a live customer service representative.
- The estimate identified in Paragraph 8 does not even include the cost or time associated with building or otherwise acquiring facilities that would

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<sup>2</sup> As noted above, if that requirement were further reduced to just 30 seconds, the cost impact would undoubtedly be substantially higher than the already extraordinary amount identified above.

be needed to provide the additional personnel with workspaces. I suspect these costs could be substantial.

- The estimate also does not take into account any ongoing operating expenses associated with these changes or any cap ex necessary to build out the systems to manage the anticipated increased call volume and the 60 second ASA or otherwise modify our IVR and OVA systems.
11. The estimate we prepared also does not take into account the feasibility of trying to implement the system changes noted above nor does it take into account the amount of time it would take to actually implement such changes.
  12. We design our systems to best meet the needs of our customers and with the hope they will remain loyal T-Mobile customers.
  13. I am not aware of having received any feedback to indicate that our customers are dissatisfied with the time it takes to reach a live service representative or are otherwise demanding that we modify our IVR or OVA to provide them with an option within 10 seconds to communicate with a live representative.
  14. T-Mobile is widely-recognized as an industry leader in customer care as reflected by the many awards it has received on that account. Here is a link to the T-Mobile website which highlights some of those awards: <https://www.t-mobile.com/news/un-carrier/2024jd-power-customer-care> (February 1, 2024)(discussing that T-Mobile received the top spot for customer care among mobile network operators for the 13<sup>th</sup> straight time in six years in the J.D. Power U.S. Wireless Customer Care Study).

I declare under penalty of perjury under the laws of the State of California that the statements above are true and correct based on my personal knowledge or based on upon information and belief.

Dated: May 9, 2025

\_\_\_\_\_/s/  
John Consalvo

# **ATTACHMENT C**

**PROPOSED ORDER**

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

Order Instituting Rulemaking Proceeding to Consider Service Quality Rules for Wireless Carriers.

Rulemaking 26-02-017

**[PROPOSED ALJ RULING]**

**GRANTING T-MOBILE WEST LLC'S MOTION TO REPLACE CONFIDENTIAL ATTACHMENT DIR 1-1 PREVIOUSLY SUBMITTED IN RESPONSE TO THE INFORMATION REQUESTS IN THE ORDER INSTITUING RULEMAKING**

In accordance with the Commission's Rules of Practice and Procedure, Assigned Administrative Law Judge Glegola has reviewed the above-referenced motion submitted by T-Mobile West, LLC on July 2, 2026, and any related submissions.

Good cause appearing, IT IS SO ORDERED:

1. The Motion of T-Mobile West LLC to Replace Confidential Attachment DIR 1-1 Previously Submitted in Response to the Information Requests in the Order Instituting Rulemaking is GRANTED in full.
2. The previously submitted Confidential Attachment DIR 1-1 will be replaced with Confidential Attachment DIR 1-1\_050925 attached to the Motion.

Dated: July \_\_, 2026 at San Francisco, California.

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/s/  
Administrative Law Judge Glegola