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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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R2602017

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

Rulemaking 26-02-017

ADMINISTRATIVE LAW JUDGE'S RULING DENYING EXTENSION REQUEST OF WIRELESS PARTIES

On August 21, 2026, the following parties served an extension request: CTIA;¹ AT&T Mobility LLC (New Cingular Wireless PCS, LLC (U-3060C)), AT&T Mobility Wireless Operations Holdings, Inc. (U-3021C), and Santa Barbara Cellular Systems, Ltd. (U-3015C) (collectively "AT&T"); T-Mobile West LLC dba T-Mobile (U-3056C), on behalf of itself and its affiliates ("T-Mobile")²; and Cellco Partnership dba Verizon Wireless (U-3001C) ("Verizon") (together, the "Wireless Parties"). This Ruling denies the extension request of Wireless Parties.

1. Wireless Parties' Extension Request³

The ruling issuing the Staff Proposal schedules a workshop for August 27, 2026, a September 8, 2026, deadline for filing opening comments on the Staff

¹ CTIA – The Wireless Association is a trade association whose members include wireless carriers, device manufacturers, and suppliers, as well as apps and content companies. AT&T, T-Mobile and Verizon are members of CTIA.

² 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 (U4441-C).

³ For clarity, Wireless Parties' Extension Request was made in an email from Geoffrey Why, attorney for CTIA and, at times, Wireless Parties. The email was served on August 21, 2026, at 2:08pm (Pacific). In certain instances, this email names Wireless Parties as the movant; in other instances, the email states that the request is from CTIA. For clarity, the assumption is that the

Footnote continued on next page.

Proposal, a September 15, 2026, deadline for reply comments, a September 15, 2026, deadline for when motions for evidentiary hearing must be filed, and a September 15, 2026, record submission date.⁴

Wireless Parties request that the Commission do the following: reschedule the August 27, 2026, Workshop for September 10; extend the deadline for initial comments on the Staff Proposal to October 20; extend the deadline for reply comments to November 3; extend the deadline for motions for an evidentiary hearing to November 13; and extend the record submission date to November 13 if no evidentiary hearing is requested, the date hearing requests – if any – are denied, or, if an evidentiary hearing is requested and granted, the date the evidentiary hearing concludes.⁵

Wireless Parties assert that “Extending the deadlines set in the Ruling will serve the Commission’s goals in this proceeding and advance the public interest.”⁶ Wireless Parties also claim that “This tightly compressed schedule would disserve the Commission’s stated goal to ‘build a robust record’ ... [and] the time available under the current deadlines would compromise parties’ ability to undertake a fulsome consideration of the issues in the Staff Proposal, which contains new proposals.” Further, the Wireless Parties state the following:

The schedule allows only eight days from issuance for parties to prepare substantively and logistically for Workshop #2. This Workshop is scheduled for the last week in August, a complex week for travel as a common week for both planned vacations and the start of the school year.

movant is Wireless Parties. The motion will be called Wireless Parties’ Extension Request or the Extension Request.

⁴ See, Administrative Law Judge’s Ruling Issuing Staff Proposal, issued August 19, 2026.

⁵ Wireless Parties’ Extension Request.

⁶ Ibid.

The schedule also allows only 20 days from issuance for parties to prepare their initial comments on the Staff Proposal, prepare initial comments on the summary and materials from Workshop #1 (which includes over 100 pages of released materials), and develop a response to Workshop #2 (which cannot begin until Workshop #2 is held, leaving 13 days). During that time AT&T, T-Mobile, and Verizon are also required to respond to data requests.

Immediately following that deadline, parties have just seven days to review what is likely to be a significant volume of initial comments encompassing the Staff Proposal and the two Workshops, and to prepare their reply comments.

Simultaneously, parties have this 27-day period to prepare and submit any desired discovery in this docket, respond to any discovery received from other parties, determine whether they should request an evidentiary hearing (a determination that hinges in no small part on review parties' initial and reply comments), and if so, preparing and submitting a motion to request it.

The dates set in the Ruling provide inadequate time for this significant volume of deliverables. The time allotted is markedly less time than was provided in the schedule for the prior service quality proceeding, Rulemaking (R.)22-03-016. In that proceeding, parties were given over nine weeks to review and provide initial comment on the Staff Proposal. That timeline has been shortened in this proceeding to less than three weeks – the last days of which overlap a federal holiday weekend. The previous proceeding allowed fifteen days for reply comments; the schedule here has been curtailed to seven. Similarly, the Ruling provides just eight days for parties to prepare for an in-person-only Workshop in Sacramento where, in the prior proceeding, parties were given seventeen days' notice to prepare for a Workshop with a virtual option. The schedule also does not provide any time for the Wireless Providers to obtain the Staff's workpapers underlying their proposal or to otherwise conduct discovery with respect to Workshop participants who were quoted widely throughout the Proposal. Without such information,

the record before this Commission will be incomplete almost by definition.

Not only are the deadlines in the Ruling extraordinarily short, but the Ruling's schedule makes them even more difficult to meet because they are concurrent with one another, requiring parties to work on multiple work products simultaneously. In contrast, none of the major deadlines in the prior Service Quality docket were concurrent with one another.⁷

Rural County Representatives of California (RCRC), The Utility Reform Network (TURN), the Center for Accessible Technology (CforAT), and the Public Advocates Office oppose granting the extension request.

2. Wireless Parties' Extension Request Denied

Wireless Parties' Extension Request is denied. Wireless Parties provide no statute or Rule⁸ that the Commission must comply with but has not. Further, the Wireless Parties have not met their burden, as their Extension Request lacks specifics, contains mostly unsupported generalities, and includes important omissions. Also noteworthy is the expressed opposition of at least four parties in this proceeding.

First, in regard to their complaint about the timing of the August 27, 2026, Workshop, Wireless Parties fail to specify a party or an individual among the many attorneys and other representatives that have appeared on their behalf that cannot attend the August 27 Workshop or are otherwise in need of accommodation. Verizon and CTIA informally asked to attend remotely, and Verizon's informal request was made prior to when Wireless Parties served their extension request on Friday. On Monday August 24, both Verizon and CTIA were informed that they may participate remotely. This issue is now moot.

⁷ Ibid.

⁸ In this case, Rule means the Commission's Rules of Practice and Procedure.

Second, in characterizing the amount of work they must undertake in the allotted time period, Wireless Parties offer few specifics. Wireless Parties attended and participated in the June 25 Workshop. Thus, they already are aware of the topics discussed. While Attachment C of the Ruling issuing the Staff Proposal contains 143 of the slides used during the June 25 Workshop, 64 of those slides are general; e.g., title slides, transition slides, panelist names, or questions asked of panelists. 46 slides are slides provided by industry panelists.⁹ Few of the slides outside these categories contain potentially new material used in the Staff Proposal.

Third, the Ruling issuing the Staff Proposal orders AT&T, T-Mobile, and Verizon to submit responses to the following requests:

- Provide the estimated total one-time and annual recurring incremental costs the wireless carrier would incur if the recommendations in the Staff Proposal were implemented. Include all assumptions, formulas, calculations, allocation methods, and supporting documents used to develop the estimate.
- Provide a separate cost estimate for each proposed requirement in the Staff Proposal, including Cal OES¹⁰ community isolation outage standard, Customer service standards, Network Availability by Public Use Microdata Areas (PUMA),¹¹ and producing, hosting, and updating signal propagation maps. For each estimate, identify the

⁹ Some of the 46 industry panel slides may be part of the 64 general slides.

¹⁰ California Office of Emergency Services.

¹¹ See, D.20-07-032, Decision Adopting Metrics and Methodologies for Access the Relative Affordability of Utility Service (Rulemaking 18-07-006, Order Instituting Rulemaking to Establish a Framework and Processes for Assessing the Affordability of Utility Service.), at 51. According to the U.S. Census Bureau, PUMAs are “statistical geographic areas defined for the dissemination of Public Use Microdata Sample (PUMS) data.”

cost category, whether the cost is one time or recurring, and the supporting documents used to justify the estimate.

- Provide an estimate for how much the average monthly bill would increase for California customers if the recommendations in the staff proposal were implemented. Include all supporting documents to justify passthrough cost estimates.¹²

Wireless Parties' complaints about the time it would take to answer these questions omit the fact that they were already ordered to respond to the first and third requests. By April 1, 2026, Wireless Parties were to submit cost estimates filed in R.22-03-016, and the following:

The additional or incremental expense, if any, that would be incurred to meet the customer service standards as described in General Order 133-E, criteria i through iv. Quantify the expense categories and amounts for each category individually and include any work products or source documents used to calculate the estimate.

Impact on customer bills. Provide an estimate of the price increase on the monthly bill for an average customer of mobile service for a single line as a result of having to implement the customer service standards as described in General Order 133-E, criteria I through IV.¹³

¹² Administrative Law Judge's Ruling Issuing Staff Proposal, issued August 19, 2026

¹³ Order Instituting Rulemaking (OIR), at 13.

AT&T, T-Mobile and Verizon did not comply in full with the OIR, including the questions about incremental expenses.¹⁴ AT&T, T-Mobile and Verizon also declined to provide estimates regarding the impact on customer bills.¹⁵

AT&T, T-Mobile and Verizon also were ordered to provide additional cost estimates, including to estimate the costs of restoring outage tickets within 1 hour, 2 hours, 4 hours, 6 hours, 12 hours and 24 hours.¹⁶

Wireless Parties offer no additional specifics regarding the “new” material that allegedly will require so much extra work on their part. However, as noted above, the information and data that Wireless Parties do identify is information or data they have already been ordered to provide and have not done so.

Finally, in response to Wireless Parties’ statement that they now may want to propound discovery requests on other parties, it should be noted that Wireless Parties have had months to do so, including two months since the June 25, 2026, Workshop.

The Commission must make decisions based on the record before it. Waiting on the hope that the Wireless Parties will now make a good faith effort

¹⁴ Administrative Law Judge's Ruling Ordering AT&T, T-Mobile, And Verizon to Produce Previously Ordered Data, issuing July 10, 2026, at 2-3.

¹⁵ *See*, Verizon, Response to OIR, filed April 1, 2026, at 13: "It is not possible or analytically sound for Verizon to specifically quantify a price change resulting from the increased cost complying with a new or expanded regulation." *See also*, T-Mobile, Response to OIR, filed April 1, 2026, at 11-12: "T-Mobile is unable to currently estimate what, if any, additional regulatory compliance costs would be passed on to the subscribers, and if so what subscribers." *See also*, AT&T, Response to OIR, filed April 1, 2026, at 35: "AT&T has not evaluated how the additional expense represented by implementation of the 80/60 standard (answering 80 percent of calls within 60 second) would affect AT&T customers bills, if at all..." AT&T did not address total pass-through costs.

¹⁶ Administrative Law Judge's Ruling Ordering AT&T, T-Mobile, And Verizon to Produce Previously Ordered Data, issuing July 10, 2026, at 5.

to provide an informed record is prejudicial to other parties that have already made that good faith effort in this proceeding, and it would not be in the public interest.

For these reasons, the Wireless Parties' Extension Request is denied.

IT IS RULED that:

1. The extension request of CTIA, AT&T Mobility LLC (New Cingular Wireless PCS, LLC (U 3060 C), AT&T Mobility Wireless Operations Holdings, Inc. (U 3021 C), and Santa Barbara Cellular Systems, Ltd. (U 3015 C) (collectively "AT&T"), T-Mobile West LLC dba T-Mobile (U-3056-C), on behalf of itself and its affiliates ("T-Mobile"), and Cellco Partnership dba Verizon Wireless (U-3001-C) ("Verizon") (together, the "Wireless Parties"), served on August 21, 2026, is denied.

Dated September 9, 2026, at San Francisco, California.

/s/ THOMAS J. GLEGOLA

Thomas J. Glegola
Administrative Law Judge