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 (Filed February 26, 2026)

MOTION OF

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")

TO FILE UNDER SEAL THE CONFIDENTIAL VERSION OF THE OPENING COMMENTS OF AT&T ON STAFF PROPOSAL AND RESPONSES TO DATA REQUESTS

Raymond P. Bolaños
Andy Umaña
AT&T Services, Inc.
430 Bush Street, 6th Floor
San Francisco, CA 94108
Tel: (415) 694-0640
E-mail: raymond.bolanos@att.com

Attorney for AT&T

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I. INTRODUCTION

Pursuant to General Order 66-D, Section 3.3, and California Public Utilities Commission ("Commission") Rule 11.4, AT&T respectfully submits this motion to file under seal certain materials and information submitted in response to the August 19, 2026 *Administrative Law Judge's Ruling Issuing Staff Proposal* (the "ALJ Ruling") in this matter.

As set out herein, AT&T has met the requirements for protection for the information marked confidential in response to the ALJ Ruling. The information meets the elements of a trade secret, and protecting its confidentiality would not tend to conceal fraud or otherwise work an injustice. Moreover, AT&T has confirmed the efforts it undergoes to keep the information secret and has articulated how it derives economic value – actual or potential – from that confidentiality.

The information AT&T seeks to protect in this motion includes: (a) the estimated total one-time and annual recurring incremental costs that AT&T would incur if the Staff Proposal recommendations were implemented, including the assumptions, formulas, calculations, allocation methods, and supporting documents underlying those estimates; (b) a separate cost estimate for each proposed requirement, including the California Governor's Office of Emergency Services ("Cal OES") Community Isolation Outage, Network Availability by Public Use Microdata Area ("PUMA"), and Customer Service standards; and (c) an estimate of the average monthly bill increase for AT&T California customers. As set forth herein, the secrecy of this information has economic value to AT&T, since, if disclosed, it could enable a competitor to, among other things, determine AT&T's spending priorities, and understand and mimic AT&T's customer service strategies. The information AT&T seeks to protect is appropriately marked confidential. The motion to file under seal should be granted.

II. LEGAL STANDARD

Under California Public Utilities Code Section 583, information provided to the Commission by a public utility shall *not* be made public, except on order of the Commission in the course of a hearing or proceeding.[1] Violation of Section 583 amounts to a misdemeanor.[2] Information submitted to the Commission may also be withheld from disclosure against a California Public Records Act ("PRA") request, when "the disclosure . . . is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege."[3] Information properly designated as a trade secret is exempt from disclosure under the PRA.[4] The "owner of a trade secret has a privilege to refuse to disclose the secret, and to prevent another from disclosing it, if the allowance of the privilege will not tend to conceal fraud or otherwise work injustice."[5] The PRA "does not require disclosure of records, the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege."[6] Under California law, a "trade secret" is defined as information that (1) derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.[7]

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[1] Cal. Pub. Util. Code § 583(a).

[2] *Id*.

[3] Cal. Gov. Code § 7927.705.

[4] Cal. Gov. Code § 7930.205; Civ. Code § 3426.7.

[5] Cal. Evid. Code § 1060.

[6] Cal. Gov. Code § 7927.705*;accord* General Order ("GO") 66-D, § 4.4 (information in possession of Commission may be withheld from PRA requests pursuant to exemptions in the PRA).

[7] Cal. Civ. Code § 3426.1(d)(1)-(2).

The Commission's treatment of information that a party asserts should remain confidential in a formal proceeding is governed by General Order ("GO") 66-D, Section 3.3. To obtain confidential treatment of filed information, a party must file a motion pursuant to Commission Rule 11.4 or comply with a process established by the Administrative Law Judge ("ALJ"). The ALJ has set a procedure in this proceeding for treatment of confidential information.[8] Confidential Information obtained by the Commission from Cal OES shall be treated "consistent" with the Commission's "processes, including GO 66-D, and statutory requirements for maintaining confidential information otherwise received from telecommunications service providers."[9] The Commission has apparently determined, in GO 133-E, that NORS and Cal-OES reports submitted to the Commission shall be treated as confidential in accordance with California Public Utilities Code Section 583 and GO 66-D.[10]

AT&T has submitted confidential information in support of its Opening Comments. By this motion, AT&T seeks protection for that confidential information, as a trade secret under California law. AT&T separately asserts the information should be protected from disclosure under the PRA's public interest balancing test. As set forth herein, the motion should be granted.

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[8] *See generally Order Instituting Rulemaking* ("OIR"), Rulemaking (R.) 26-02-017, at 11-15 (Mar. 2, 2026). The OIR also states that, in considering a party's request for confidential treatment of information, the ALJ will also apply the "public interest balancing test" under Gov. Code Section 6255(a). OIR at 16, n.35. AT&T asserts that the public interest balancing test is a separate catchall confidentiality analysis under the PRA, that is independent of the determination of trade secret protection. Though AT&T believes the public interest weighs in favor of confidentiality for the subject information, because the information it seeks to protect are trade secrets, AT&T need not satisfy the public interest balancing test. *See* discussion, *infra.*

[9] Cal. Gov. Code § 53122(c)(4).

[10] GO 133-E, § 5(e).

III. DISCUSSION

The confidential information AT&T seeks to protect (and the legal bases for that protection) is discussed below.

A. AT&T's Customer Service Cost Information Is a Protected Trade Secret.

In its Opening Comments, AT&T has provided information regarding its customer service resolution rate and the cost estimates to meet the proposed Customer Service Standard, which includes discussions of call volumes and subscriber numbers. This information is a protected trade secret under California law. In *Coast Hematology-Oncology Associates Medical Group, Inc. v. Long Beach Memorial Medical Center*, a medical group sought to protect as a trade secret its internal records about its staff physicians' productivity, including information regarding how that productivity was measured. The court ruled that such information "can be confidential and can qualify for trade secret protection," because the medical group could "[derive] independent economic value, actual or potential, from [the productivity information] not being generally known to the public or to other persons who can obtain economic value from its disclosure or use."[11]

The internal customer service costs, staffing models, and productivity information submitted by AT&T with its Opening Comments include the number of calls AT&T receives from customers, staffing models for additional customer service representatives and

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[11] *Coast Hematology-Oncology Assocs. Med. Grp, Inc. v. Long Beach Mem'l Med. Ctr*, 58 Cal. App. 5th 748, 762-763 (2020) (internal quotations omitted)*;see also Matter of Verizon N.Y. Inc. v N.Y. State Pub. Serv. Commn.*,46 Misc. 3d 858, 863 (N.Y. Sup. Ct. 2014) ("scripts for call center representatives; training materials; and similar documents, all of which are intended to inform, instruct, and advise Verizon's employees on various aspects of how they should interact with current and prospective VVL customers" (internal quotations omitted)); *see also HCTec Partners, LLC v. Crawford*, 676 S.W.2d 619, 628, 638 (2022) (information technology firm established its "data about performance results from implementation of [its] key operating objectives," its "performance management processes," and its "designs for [its] key performance indicators," were all protected trade secrets. The information was related to business operations and involved "direct competitors in the highly competitive [technology] industry").

mail-processing employees, loaded labor rates and per-employee overhead costs, California-specific subscriber counts and California's share of AT&T's national wireless customer base, and the methodology for attributing national call volumes to California, including the percentage of callers AT&T can identify as California wireless customers before the first-prompt live-agent option, as described in the Bilski September 8 Declaration.[12]

The Commission should grant the motion to file this information under seal.[13] The costs AT&T incurs in fielding customer service calls, and its total volume of calls are protected trade secrets that require protection from publication. AT&T has taken the requisite steps to keep that information confidential. The motion to seal should be granted as to such information.

AT&T derives independent economic value from the above customer service-related information not being generally known to competitors who could utilize the information to design their own customer service processes and more effectively compete with AT&T. AT&T also makes reasonable efforts to maintain its secrecy. The information consists of internal business assessments and projections compiled from AT&T's confidential data sources, including call volumes, workforce hours, loaded labor rates, and customer service center costs. As the court recognized in *Whyte*, such strategic business information is protected as a trade

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[12] *See generally Opening Comments of 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") to Administrative Law Judge's Ruling Issuing Staff Proposal* ("AT&T's Opening Comments"), R.26-02-017, Attachment A, *Declaration of Rachel Bilski* ("Bilski September 8 Declaration"), (Sept. 8, 2026).

[13] The importance of secrecy regarding key performance indicators ("KPIs") for competitive entities is reflected in SEC regulation 17 CFR § 229.402, which governs executive compensation disclosures. In SEC filings under 229.402, "registrants are not required to disclose target levels with respect to specific quantitative or qualitative performance-related factors, . . . or any other factors or criteria involving confidential trade secrets or confidential commercial or financial information, the disclosure of which would result in competitive harm for the registrant." *Id.*

secret.[14] Public disclosure of this information would disadvantage AT&T by revealing its confidential cost structures and operational strategies, thereby enabling competitors to recalibrate their own labor models or leverage AT&T's proprietary compliance analyses for competitive gain. AT&T maintains strict confidentiality by restricting access to personnel with a demonstrated business need and disclosing this information only in secure, confidential environments.[15] The motion should be granted.

B. AT&T's Network Operations Information and Costs Associated Therewith Are a Protected Trade Secret.

In its Opening Comments, AT&T has provided its estimated costs associated with operating its wireless network in California and information regarding AT&T's mean time to repair site outages in California.[16] This confidential trade secret information should be protected from public disclosure.

A trade secret is information, including a formula, pattern, compilation, program, device, method, technique, or process that: (1) "[d]erives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use"; and (2) "[i]s the subject of efforts that are reasonable under the circumstances to maintain its secrecy."[17] "The value of information claimed as a trade

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[14] *Whyte v. Schlage Lock Co.*,101 Cal. App.4th 1443, 1456 (2002) (internal strategic planning documents protected as trade secrets).

[15] *See generally* Vigil July 27 Declaration.

[16] *Comments of 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") on Order Instituting Rulemaking and Responses to Information Requests* ("AT&T's April 1 Comments"), Attachment 3, Declaration of Michael Zimmerman ("Zimmerman March 31 Declaration") and Exhibit A thereto, (Apr. 1, 2026); AT&T's April 1 Comments , Attachment 7, Declaration of Lance Hastings ("Hastings March 31 Declaration").

[17] Cal. Civ. Code § 3426.1(d).

secret may be established by direct or circumstantial evidence."[18] "Cases have recognized that information related to cost and pricing can be a trade secret."[19]

In its Opening Comments, AT&T has marked as confidential certain information regarding outages on the AT&T wireless network in the years 2020-2026. This information, contained in declarations,[20] includes a listing and/or a discussion of, among other things: total community isolation outages and average outage duration; the respective percentages for the main known types of outages; the number of AT&T macro cell sites in each PUMA; and the total "uptime" of the AT&T wireless network in certain PUMAs; and the estimated costs of building and operating new, redundant AT&T network infrastructure do avoid the recommended penalties in the Staff Proposal.[21]

The Commission has already ruled, in GO 133-E, that "Cal OES reports submitted to the Commission pursuant to these rules shall be treated as confidential in accordance with Pub. Util. Code § 583 and General Order 66-D."[22] This language in 133-E protects the outage-related information listed above that AT&T has submitted in its Opening Comments.

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[18] *Altavion, Inc. v. Konica Minolta Sys. Lab., Inc.* 226 Cal.App.4th 26, 62 (2014).

[19] *Whyte v. Schlage Lock Co.*, 101 Cal.App.4th 1443, 1455 (2002); s*ee also Matter of Verizon N.Y. Inc. v New York State Pub. Serv. Commn.*, 46 Misc.3d 858, 878-880 (2014) ("costs a company incurs in operating its business may [also] be trade secrets" under a state's public records or freedom of information law (citations omitted). "Pricing and budgetary information may also be shielded from disclosure." *See, e.g., generally, Matter of Catapult Learning, LLC v New York City Dept. of Educ*., 109 A.D.3d 731, 732. *See also Matter of New York State Elec. & Gas Corp. v New York State Energy Planning Bd.,* 221 A.D.2d 121, 125 (operational data that could result in competitors "inferring essential aspects of [power producer's] production costs" were properly withheld).

[20] *See generally* sections of the Declaration of Michelle Leingang (filed April 1, 2026) marked as confidential, regarding various outage-related information, which AT&T seeks to protect as confidential.

[21] *See generally* Declaration of Joshua Mathisen (filed September 8, 2026).

[22] GO 133-E, § 5(e) at 13.

This protection also is mandated by California statutory law. Under Government Code Section 53122, Cal-OES itself must keep all outage notifications confidential, may only aggregate individual carriers' outage data in any public dissemination, and the aggregated data cannot name individual telecommunications service providers.[23] The same California statute requires the Commission to "treat any confidential information obtained from the office pursuant to this section consistent with its processes, including General Order 66-D, and statutory requirements for maintaining confidential information otherwise received from telecommunications service providers."[24]

The rationale behind California's policy that network outage data remain confidential is clear and consistent with similar federal law.[25] The protections afforded by Public Utilities Code Section 583 and Government Code Section 53122 are designed to encourage carriers to provide the Commission with the information it needs to fulfill its functions without fear the data will be disseminated. In this instance, AT&T seeks to protect specific data and information regarding its network outages and the manner in which those outages are measured and managed.

This information should be protected as confidential. The motion to seal should be granted as to such information.[26]

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[23] *See generally,* Govt. Code § 53122.

[24] *Id.*

[25] For example, "[i]nformation stored in NORS is treated as confidential because of potential national security and **commercial proprietary concerns.**" CRS Report R48776 (12/22/25) (emphasis added). Industry observers have commented that providing certain outage data (frequency, duration, root causes, geographic scope) constitutes competitively sensitive information that, if publicly disclosed, could be used by rivals to target marketing, poach customers in underperforming areas, or reverse-engineer a competitor's network architecture and investment priorities. *Id.,* n.75 (citations omitted).

[26] AT&T and other carriers are obligated to post outage information on their public website during the period of the outage. *See* Leingang Decl. (April 1, 2026), ¶ 7. This information is not stored, however, nor does AT&T distribute anything like the specific and comprehensive information it is now providing to the Commission, which it seeks to protect via this motion.

In *Matter of Verizon N.Y. Inc. v. New York State Public Service Commission,* Verizon compiled cost information and revenue estimates arising from construction of its communication network. The data included, inter alia, "figures related to the specific costs of installation" of its DAS system, including costs of individual components like labor and trenching.[27] In an action brought by Verizon to protect the information from a public records act request, the court ruled that Verizon employee declarations satisfactorily addressed how the cost information was used in Verizon's business, how it gave Verizon an advantage over its competitors, and how disclosure of the information could assist those competitors "seeking to cut into petitioner's market share."[28] Those same declarations demonstrated that the information was not information that petitioner would publicly disclose. *Id.* The court in *Matter of Verizon* found that Verizon had made a "valid case" for trade secret protection and ruled that the cost information was exempt from production under New York's state equivalent of the PRA.[29]

In a matter involving Verizon on similar issues, *Matter of Verizon N.Y. Inc. v. New York State Pub. Serv. Commission*,[30] the reviewing court observed, first, that "[t]here is no dispute here that petitioners face actual competition in the telecommunications industry. The issue [regarding potential protection for confidential corporate information] accordingly distills to whether petitioners demonstrated the existence of substantial competitive injury from disclosure

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[27] *Matter of Verizon,* 46 Misc. 3d at 879.

[28] *Id*. at 880.

[29] *See generally Matter of Verizon,* 46 Misc. 3d at 881-882. *See also Ruckelshaus v. Monsanto Co.,* 467 U.S. 986, 1003-04 (1984) ("[T]o the extent that Monsanto has an interest in its . . . data cognizable as a trade-secret property right under [state] law, that property right is protected by the [Constitution]"); *DVD Copy Control Assn., Inc. v. Bunner* (2003) 31 Cal.4th 864, 880 (2003) ("trade secret law creates a property right"); *ITT Telecom Prod. Corp. v. Dooley* (1989) 214 Cal.App.3d 307, 318 ("[T]rade secrets have been recognized as a constitutionally protected intangible property interest").

[30] *Matter of Verizon N.Y. Inc. v N.Y. State Pub. Serv. Commn.*, 239 A.D.3d 1110 (N.Y. Sup. Ct. 2025).

of confidential information, which depends upon an assessment of the commercial value of the requested information to competitors."[31] This is the appropriate inquiry here, as well, and the conclusion should be the same: in a competitive industry, the public disclosure of confidential corporate cost information threatens to inflict substantial competitive injury, and thus that information should be properly protected.[32]

Disclosure of AT&T's nonpublic network-related information would enable AT&T's competitors to anticipate and potentially undercut AT&T's business strategies, to AT&T's detriment. Were this information available to AT&T's competitors, they could, among other things, educate themselves regarding the choices AT&T makes regarding resource allocation, and the emphasis AT&T places on certain business functions in the planning and operation of its Mobility business. The information could be used by competitors to guide their own strategic planning efforts, and aid them in competing against AT&T in certain locations in California. Disclosure of this information could also negatively harm consumers, by distorting competition and reducing incentives for investment and innovation.[33] AT&T thus derives an economic benefit from keeping the information confidential and takes operational steps to ensure that it remains confidential.[34] The information should be protected. The motion should be granted.

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[31] *Id.* at 1113. This language is similar to the California standard for establishment of a trade secret, which requires that the party seeking protection for the commercial information derive "independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use." Civ. Code § 3426.1(d).

[32] *See, e.g., Apple Inc. v. Samsung Elecs. Co.,* 727 F.3d 1214, 1225-26 (Fed. Cir. 2013) (district court abused its discretion in ordering detailed product-specific financial information likely constituting trade secrets to be unsealed).

[33] *See generally* Abrecht July 27 Declaration, Hastings July 27 Declaration, Zimmerman July 27 Declaration, Vigil July 27 Declaration.

[34] *Id.*

C. Disclosure of AT&T's Confidential Information Would Not Benefit the Public Interest.

Even if the confidential AT&T information discussed herein was not a protected trade secret (though it is), exempt from public disclosure, the information submitted by AT&T should also be deemed protected from disclosure under the public interest balancing test of the CPRA. The public interest balancing test is a "catchall" provision that provides appropriate protections for confidential information that does not qualify for protection under any of the express provisions of the CPRA. Gov. Code § 7922.000. This provision allows for confidentiality of otherwise not protected information by balancing the public's right to access information, the government's need, or lack of need, to preserve confidentiality, and an individual's right to privacy.[35]

AT&T has submitted adequate declaratory evidence to establish a sufficient basis to independently grant confidential treatment for the information under the public balancing test. No public interest will be satisfied by making AT&T's customer service costs public and offering that information to AT&T's competitors. Nor will the public interest be served by publication of AT&T's information regarding its network, including outage incident information.

Not only is there no clear public interest in favor of disclosure, the public will be harmed if this confidential and proprietary information is disclosed, especially if its disclosed to AT&T's competitors.[36] The public benefits when industry members engage in fair competition.

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[35] *Iloh v. Regents of University of California*, 87 Cal.App.5th 513, 523-524; *Castañares v. Superior Court*, 98 Cal.App.5th 295, 304; *Copley Press, Inc. v. Superior Court* (2006) 39 Cal.4th 1272, 1282.

[36] Disclosure of AT&T's proprietary information in this case would also run afoul of the policies behind the antitrust laws, the main principle of which is that competitors must set prices and other competitive terms independently, without coordinating with rivals. The sharing of confidential and proprietary information among competitors — including pricing data, cost structures, compensation information, and strategic plans — can form the basis for or facilitate unlawful agreements such as price-fixing or market allocation. *See National Soc. of Professional Engineers v. United States* (1978) 435 U.S. 679, 695 ("Sherman Act reflects a legislative judgment that ultimately competition will produce not only lower

"A business has potentially everything to lose from disclosure of its trade secrets, but the public has little legitimate interest in judicial documents related to trade secret disputes."[37] Failing to grant AT&T's motion to file under seal could actually impair competition to the detriment of the public. The motion should be granted.[38]

IV. CONCLUSION

Based on the foregoing, the Motion should be granted. The information identified in AT&T's Opening Comments should be deemed appropriately redacted and the confidential version of AT&T's Response should be filed under seal under Rule 11.4.

Date: September 8, 2026

Respectfully submitted,

/s/ Raymond P. Bolaños

Raymond P. Bolaños
Andy Umaña
AT&T Services, Inc.
430 Bush Street, 6th Floor
San Francisco, CA 94108
Tel: (415) 694-0640
Email: raymond.bolanos@att.com

Attorneys for AT&T

prices, but also better goods and services. 'The heart of our national economic policy long has been faith in the value of competition.' The assumption that competition is the best method of allocating resources in a free market recognizes that all elements of a bargain -- quality, service, safety, and durability -- and not just the immediate cost, are favorably affected by the free opportunity to select among alternative offers") (internal quotations and citations omitted).

[37] Kyle J. Mendenhall, Note, *Can You Keep a Secret? The Court's Role in Protecting Trade Secrets and Other Confidential Business Information from Disclosure in Litigation*, 62 Drake L. Rev. 885 (2014) (citing *Nixon v. Warner Commc'ns, Inc.,* 435 U.S. 589, 598 (1978) ("Nixon Court held the public does not have a common law interest in access to court records for use "as sources of business information that might harm a litigant's competitive standing").

[38] As set out above, AT&T has met the standard for trade secret protection of the subject material, and thus no public interest balancing test analysis is necessary. That said, no public interest under Govt. Code Section 7922.000 will be satisfied by failing to grant the instant motion to file under seal.

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 (Filed February 26, 2026)

[PROPOSED] ORDER GRANTING MOTION OF 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") TO FILE UNDER SEAL THE CONFIDENTIAL VERSION OF THE OPENING COMMENTS OF AT&T ON STAFF PROPOSAL AND RESPONSES TO DATA REQUESTS

On September 8, 2026, 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") filed a Motion to file under seal the confidential version of the *Opening Comments of AT&T on Staff Proposal and Responses to Data Requests*, along with accompanying Declarations containing additional information marked confidential by AT&T.

The information contained within the confidential version of the Comments and the Declarations of AT&T contain confidential, proprietary, and trade secret information comprising details regarding the following: (1) information regarding AT&T's network operations; (2) the number of AT&T community isolation outages and average outage duration for 2023-2025; (3) the percentage reduction in the number of AT&T community isolation outages from 2025 to 2026; (4) the rank of community isolation outage and average duration numbers for specific PUMAs in 2023-2025; (5) respective percentages of known AT&T community isolation outage causes in 2023-2025; (6) number of AT&T macro cell sites in California, and number of sites in respective PUMAs; (7) network availability percentages for AT&T network in years 2023-2025, including in respective PUMAs; (8) AT&T's projected costs of complying with the proposed 24-hour outage and Network Availability standards in the Staff Proposal; (9) customer service call resolution rates; (10) cost estimates to meet the proposed Customer Service Standard; and (11) call volumes and subscriber numbers.

The evidence and argument submitted in AT&T's Motion support the conclusion that (1) AT&T derives independent economic value, actual or potential, from the information not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and (2) the same information is the subject of reasonable efforts by AT&T under the circumstances to maintain the information's secrecy. It is further determined that granting the Motion will not tend to conceal fraud or otherwise work injustice.

There has been no opposition to this Motion and the time for submission of such opposition has expired. No hearing on the Motion is necessary.

Good cause having been shown, and no opposition to the Motion having been submitted,

IT IS HEREBY RULED that:

1. AT&T's Motion to File Under Seal the Confidential Version of the *Opening Comments of AT&T on Staff Proposal and Responses to Data Requests* is GRANTED.

2. The identified information shall be received under seal, shall remain under seal, and shall not be made accessible to the public or disclosed to anyone other than Commission staff, except upon further order or ruling of the Commission.

[*Signature on next page*]

Dated __________________, 2026 at San Francisco, California

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Thomas J. Glegola
Administrative Law Judge