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Attachment A

Declaration of Mark A. Settle

DECLARATION OF MARK A. SETTLE

I, Mark A. Settle, hereby declare and attest as follows.

1. I hold a B.S. in Electrical Engineering from West Virginia Institute of Technology, and a M.S. in Electrical Engineering from George Washington University in Washington, D.C. I am a Licensed Professional Engineer (P.E.) (Virginia). I have over twenty years of experience in electrical engineering, including nine years at the Federal Communications Commission (“FCC”) where my last position was Chief of the Policy and Rules Division of the Office of Engineering and Technology. Before that, I served for seven years in leadership roles in the Spectrum Analysis Branch at the National Telecommunications and Information Administration, U.S. Department of Commerce, including two years leading the Branch. I also spent nine years as an Electronics Engineer at the Naval Surface Warfare Center. During my career (including at the FCC and in my current role at a law firm), I have frequently had the opportunity to review and analyze technical and economic data concerning the performance of communications networks such as the data discussed below.
2. I am Senior Engineering Advisor at the law firm of Wilkinson Barker Knauer LLP in Washington, D.C., counsel to CTIA. In that capacity, I prepared:
 - a. The aggregated cost data that is presented on pages 9, 13, 18, and footnotes 30 and 76 of the Reply Comments of CTIA on Staff Proposal, filed September 15, 2026, and also on page 37 of the Comments of CTIA on Staff Proposal filed September 8, 2026 (the “CTIA Staff Proposal Comments”) (the “Aggregated Cost Data”);
 - b. The aggregated data on the annual time, from 2021-2025, with no reported California Office of Emergency Services (“Cal OES”) Community Isolation Outages on AT&T, T-Mobile, and Verizon’s networks that is displayed graphically in Attachment A to the Second Motion of CTIA to Submit Aggregated Data Relevant to Issues in This Proceeding, filed August 31, 2026; displayed graphically at page 8, Figure 1, in the CTIA Staff Proposal Comments, filed September 8, 2026; and displayed graphically in Attachment C of the Reply Comments of CTIA on Staff Proposal, filed September 15, 2026 (the “Aggregated Uptime Data”);
 - c. The aggregated data on the annual average number of ZIP Codes reported by AT&T, T-Mobile, and Verizon in their 2021-2025 Cal OES Community Isolation Outage Reports that is displayed graphically in Attachment B to the Second Motion of CTIA to Submit Aggregated Data Relevant to Issues in This Proceeding, filed August 31, 2026; displayed graphically at page 10, Figure 3 of the CTIA Staff Proposal Comments; and displayed graphically in Attachment B of the Reply Comments of CTIA on Staff Proposal, filed September 15, 2026 (“Aggregated ZIP Code Data”); and

- d. The aggregated data on the causations of outages derived from AT&T's, T-Mobile's, and Verizon's review of data derived from their 2023-2025 FCC Network Outage Reporting System ("NORS") reports, which is displayed graphically at page 9, Figure 2 of the CTIA Staff Proposal Comments; and displayed graphically in Attachment D of the Reply Comments of CTIA on Staff Proposal, filed September 15, 2026 (the "Aggregated Causation Data").
3. CTIA requested that I prepare the Aggregated Cost Data, the Aggregated Uptime Data, the Aggregated ZIP Code Data, and the Aggregated Causation Data so that CTIA could submit information relevant to the issues in the scope of this proceeding that was not specific to any one provider, and therefore not confidential, in order to provide a more fulsome record for the benefit of all parties and the Commission. To prepare the Aggregated Cost Data, the Aggregated Uptime Data, the Aggregated ZIP Code Data, and the Aggregated Causation Data, I reviewed confidential information that was provided to me individually by each of AT&T, T-Mobile, and Verizon (the "Wireless Providers") on a confidential basis pursuant to a Common Interest Agreement among CTIA and the Wireless Providers consistent with the Wireless Providers' and CTIA's aligned interests in this proceeding. To preserve the confidential and privileged nature of the information and to maintain full compliance with antitrust laws and guidelines, I did not share any information provided to me by any individual Wireless Provider with any other Wireless Provider, with any CTIA employee, or with anyone else.
4. The data I used to prepare the Aggregated Cost Data came from the following sources:
 - a. Confidential declarations by Craig Sherry and John Consalvo of T-Mobile, provided to me in an email from Leon Bloomfield, counsel to T-Mobile. These are the same declarations that T-Mobile attached as, respectively, attachments B and C to T-Mobile West LLC's Opening Comments on Staff Proposal Included as Attachment A to the Administrative Law Judge's Ruling Issuing Staff Proposal (filed Sept. 8, 2026).
 - b. Confidential declarations of Rachel Bilski and Joshua Mathisen of AT&T, provided to me in an email from Joshua Mathisen of AT&T. These are the same declarations that AT&T attached as, respectively, Attachments B and C to its 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) on Staff Proposal and Responses to Data Requests (filed Sept. 8, 2026).
 - c. A spreadsheet of confidential cost estimate data provided to me in an email from Jane Whang of Verizon, which I have confirmed with Ms. Whang is the same spreadsheet identified as "Exhibit 2" in the Opening Comments and Response of Cellco Partnership dba Verizon Wireless to August 19, 2026 Administrative Law Judge Ruling Issuing Staff Proposal (filed Sept. 8, 2026).

5. To prepare the Aggregated Cost Data, I reviewed the information listed immediately above to identify each Wireless Provider's estimate of one-time and annual recurring costs to comply with the Staff Proposal's Cal OES Cal OES Community Isolation Outage Standard, Network Availability by PUMA Standard, and Customer Service Standard, respectively, where provided. I added up each provider's one-time and annual recurring cost estimate to arrive at an aggregated one-time and annual recurring cost estimate for each requirement. I then sent the aggregated figures by email to Benjamin Aron of CTIA without attributing any specific number to an individual Wireless Provider.
6. The data I used to prepare the Aggregated Uptime Data and the Aggregate ZIP Code Data came from the following sources:
 - a. A spreadsheet of confidential T-Mobile Cal OES outage data, provided to me in an email from Leon Bloomfield, counsel to T-Mobile.
 - b. A spreadsheet of confidential AT&T Cal OES outage data, provided to me in an email from Joshua Mathisen of AT&T.
 - c. A spreadsheet of confidential Verizon Cal OES outage data provided to me in an email from Jane Whang of Verizon.
7. To prepare the Aggregated Uptime Data, I reviewed the information listed immediately above to identify information on each Wireless Provider's network uptime, and produced an average (mean) for the three Wireless Providers together for the years 2021, 2022, 2023, 2024, and 2025. To prepare the Aggregate ZIP Code Data, I identified the number of ZIP Codes included in Cal OES Community Isolation Outage Reports for each Wireless Provider, and calculated the combined total for all three Wireless Providers together for the years 2021, 2022, 2023, 2024, and 2025. I then calculated the percentage of the aggregated total outage durations that could be attributed to the specific duration lengths across all five years. I then sent the aggregated figures by email to Benjamin Aron of CTIA without attributing any specific number to an individual Wireless Provider.
8. The data I used to prepare the Aggregated Causation Data came from the following sources:
 - a. A spreadsheet of confidential T-Mobile outage causation data for the years 2023, 2024, and 2025 provided to me in an email from Leon Bloomfield, counsel to T-Mobile.
 - b. A spreadsheet of confidential AT&T outage causation data for the years 2023, 2024, and 2025 provided to me in an email from Joshua Mathisen of AT&T.
 - c. An email containing tables of confidential Verizon outage causation data for the years 2023, 2024, and 2025 provided to me in an email from Jane Whang of Verizon.
9. To prepare the Aggregated Causation Data, I reviewed the information listed immediately above and identified the number of outages in each Wireless Provider's data for each year by cause, and summed all three Wireless Providers' numbers of outages in each cause

category in each year. I then sent the aggregated figures by email to Benjamin Aron of CTIA without attributing any specific number to an individual Wireless Provider.

I certify under penalty of perjury that the foregoing is true and correct based on my personal knowledge, information, and belief.

September 15, 2026

A large black rectangular box redacting the signature of Mark A. Settle.

Mark A. Settle, P.E.