

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



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

R. 26-02-017

**T-MOBILE WEST LLC'S REPLY COMMENTS RE OPENING COMMENTS ON
STAFF PROPOSAL**

[PUBLIC VERSION]

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Dated: September 15, 2026

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Pursuant to Ordering Paragraph 2 of the ALJ Glegola’s August 19, 2026 Ruling Issuing Staff Proposal, T-Mobile West LLC dba T-Mobile (U-3056-C), on behalf of itself and its affiliates (collectively referred to as “T-Mobile”),¹ respectfully submits the following Reply Comments on the Staff Proposal included as Attachment A to the ALJ Ruling (the “Staff Proposal”).

I. INTRODUCTION

The Opening Comments submitted on September 8, 2026 confirm several critical points that are central to the underlying purpose of this Proceeding as described by the Commission:

1. The record evidence establishes that wireless networks are dependable virtually 24/7; wireless customer care is “sophisticated” and addresses the concerns of customers with a multitude of ever-evolving tools and the wireless maps; and that there are no uniform standards across carriers or technologies with respect to propagation maps.
2. The Staff did not consider any of the record evidence in putting forth its Staff Proposal.
3. There is no credible record evidence of any problem with respect to outages, customer care or mapping websites.

¹ 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.

4. The estimated costs of compliance with the Staff Proposal Recommendations for T-Mobile and the industry are staggering by any measure and are not offset by any credible suggestion (leave aside competent evidence) of what issue the Staff Proposal recommendations would address (*i.e.*, the proverbial solution in search of a problem), how they would solve – or even ameliorate - that problem or how that solution is cost-justified.

Instead, the California Public Advisors Office (“Cal PA”), The Utility Reform Network (“TURN”), the Rural County Representatives of California/Center for Accessible Technology (“RCRC/CforAT”) and the Small Business Utility Advocates (“SBUA”) (collectively the “Non-Wireless Parties”) create a series of “wish lists” for further obligations without even addressing the fundamental question of whether there is an issue that warrants regulatory intervention and, if so, what is the appropriate mechanism for effectively dealing with that issue.² These suggestions should be disregarded in their entirety.

II. REPLY COMMENTS

A. The Record Confirms that No Outage Repair is Warranted

The Non-Wireless Parties uniformly support the Staff Proposal’s recommendation to impose a 24-hour repair standard on all Cal OES Community Isolation Outages.³ Without any consideration of the actual record before the Commission, or an attempt to build or challenge that

² Indeed, the Staff Proposal itself seems to be primarily an effort to gather additional data about how wireless carriers operate; not an evaluation of their current practices. *See* Staff Proposal at 8 (“Service quality standards and reporting transparency are necessary to determine whether the carriers advertised network performance translates into reliable service for California customers, including measurable data on network availability, outage duration, restoration time, and coverage.”); *id.* at 23 (“The carriers’ customer service claims show that they already operate sophisticated customer service systems, but those internal systems do not provide the Commission with standardized, comparable information about whether customers can reach assistance to get their issues resolved.”); *id.* at 41 (“This [PUMA] reporting structure gives the Commission daily data to identify localized service failures while also providing a weekly, monthly, and quarterly averages to compare performance across carriers and geographic areas.”).

³ *See* Cal PA Opening Comments at 1 (“The Commission should adopt the CAL OES Community Isolation Outage Standard,...”); TURN Opening Comments at 4 (“The proposed requirement that Community Isolation Outages be restored within 24 hours is reasonable, and the Commission should adopt it.”); SBUA Opening Comments at (“SBUA supports the Staff Proposal’s 24-hour restoration standard for community isolation outages,...”); RCRC/CforAT Opening Comments at 4 (same).

record, the Non-Wireless Parties also propose a series of additional requirements including automatic customer credits and identification of ESJ Communities within impacted ZIP Codes.⁴ Those recommendations, as well as the Non-Wireless Parties' support for the Outage Repair Standard, completely disregard the extensive fact-based record that has been built in this Proceeding as directed by the Commission. That record confirms that over the past three years:

- Wireless network uptime is near 100%;⁵
- Total outages account for approximately 0.20% - i.e., 2 tenths of one percent - of available uptime;⁶
- Of the outages that occur, only a small fraction – even according to the Staff Proposal - are over 24 hours and those numbers are decreasing;⁷

⁴ See Cal PA Opening Comments at 2 (“The Commission should add automatic customer credits for the CAL OES Community Isolation Standard, similar to GO 133-E. Wireless community isolation outages affect entire communities.” (footnote omitted)); see also SBUA Opening Comments at 3 (“SBUA recommends the Commission pair each of the three fine structures with an automatic customer credit, applied without requiring the affected customer to request one.”); TURN Opening Comments at 21 (“TURN recommends requiring wireless service providers in their quarterly reports on wireless community isolation outages to report on whether each community isolation outage affected an ESJ community as defined by the Commission.” (footnote omitted)); SBUA Opening Comments at 4-5 (“SBUA recommends the Commission add ESJ community designation...to the required [Cal OES Community Isolation Outage] reporting fields...”).

SBUA's suggestion is particularly striking given its admission that it “.. is not aware of facts, documents, data, or analysis establishing that the disparity [with respect to service in ESJ communities] itself currently exists.” See SBUA Responses to CTIA Data Request 5 (September 8, 2026).

⁵ See generally Declaration of Andy Gormley included as Confidential Attachment A, ¶¶ 3-8 in particular; CTIA Reply Comments at Attachment C (providing updated industry-wide aggregated Cal OES uptime data); see also T-Mobile's Advice Letters Nos. 51, 55 and 63 (Annual Resiliency Plans submitted for 2023, 2024 and 2025 respectively) at Confidential Attachment A, RAN Worksheet, Column O (indicated “% Uptime for sites identified in HFTDs 2 and 3); and T-Mobile West LLC's Response to Information Requests in the Order Instituting Rulemaking (April 1, 2026) (“T-Mobile's Response to OIR Information Requests”) at 18 (Opensignal Network Availability data).

⁶ That percentage is only 0.16% for 2025 (and 2024). See CTIA Reply Comments at Attachment C. For T-Mobile, those percentages are [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL], respectively.

⁷ See Staff Proposal at 20 (Table reflects the aggregated count of final Cal OES outages from all carriers by time over the years 2023, 2024 and 2025. The percentage of all outages over 24 hours is ~7.8% (4.6% + 1.1% + 2.1%). The Staff apparently relied on Final Cal OES Report counts to create its chart. A more precise analysis by ZIP Code reflects the percentage is even smaller.

- Of those outages, the ability to restore is generally not in the control of the carriers.⁸

In addition, the underlying justification for imposing an outage repair standard is built on a demonstrably incorrect premise as it is undisputed that Cal OES outages should not – either by definition or as a practical matter - impact a consumer’s ability to reach 9-1-1.⁹ The FCC’s Must Carry Rules, and the carriers’ implementation of those rules, have long been specifically designed to ensure that consumers can reach 9-1-1 as long as they have a charged device. This is the case regardless of whether their home network is impacted or whether the consumer even has a wireless plan at all.¹⁰

⁸ See, e.g., T-Mobile Opening Comments at 16 (reporting the estimated percentages of outages caused by backhaul issues for NORs outages and Cal OES outages greater than 72 hours; and stating that “...many outages are caused by matters completely outside the provider’s control...”); Gormley Declaration, Attachment A at ¶ 9; see also AT&T’s Opening Comments at 2 (“AT&T has presented data showing that most California Governor’s Office of Emergency Services (“Cal OES”) outages are caused by events outside AT&T’s control or are the result of planned maintenance.”); Verizon Opening Comments at 2 (“Providers share the Commission’s goal of preventing outages, but as explained below, the proposed Cal OES Community Isolation Outage standard will not prevent lengthy outages because many are primarily due to factors beyond a provider’s control.”).

See also T-Mobile West LLC’s Response to the Administrative Law Judge’s Ruling Ordering AT&T, T-Mobile, and Verizon to Produce Previously Ordered Data (“T-Mobile’s Response to Additional Information Requests”) (July 27, 2026) at Appendix B, Attachment RIR 2-02 (T-Mobile Workshop Session 2 PowerPoint) at Slide 6 (“Network outages are generally caused by outside factors such as backhaul cuts, emergency disasters like wildfires and severe weather, and disruptions to commercial power.”). See also T-Mobile’s Opening Comments, Sherry Declaration at ¶ 10 (“I am not aware of any current network design that does or could realistically prevent every cell site outage, especially given the fact that cell sites depend on a number of independent factors to operate without interruption, many of which are outside the provider’s control.”) and, in general, ¶¶ 9-13 (outages section).

⁹ T-Mobile notes that despite the repeated explanations regarding the FCC’s Must Carry Rules (see, e.g., T-Mobile Opening Comments at 12-13), many Non-Wireless Parties still appear confused by this concept. See TURN Opening Comments at 2 (“The California Governor’s Office of Emergency Services (“Cal OES”) already collects Community Isolation Outage data for purposes of immediately identifying locations where 911 is not functioning for a large percentage of customers subscribing to a particular network in a particular location.”); RCRC/CforAT’s Opening Comments at 4 (mischaracterizing Cal OES’s [Community Isolation Dashboard](#) as the “9-1-1 outage dashboard”).

¹⁰ See 47 C.F.R. § 9.10(b); see also T-Mobile Opening Comments at 12-13 (discussing the FCC Must Carry Rules and 911 calling); AT&T Opening Comments at 33-34 (same); and CTIA Opening Comments at 25 (same); Verizon Opening Comments at 15 (“Wireless networks, however, enable a 911 call made on an out-of-service network to be carried by other provider networks operating in the area, and unlike a

In other words, although wireless outages undoubtedly do – and will occur – they are particularly limited in scope and do not warrant any type of regulatory intervention; a fact that should be reassuring to the public, the Commission and the Non-Wireless Parties.

Moreover, neither the Staff Proposal – nor any of the Non-Wireless Parties – credibly suggest how mandating an outage repair standard would provide any meaningful benefit to Californians. As noted above, wireless network uptime is already well above 99% by any measure.¹¹ Their support of this recommendation seems to be based little more than an unrealistic desire for absolutely perfect networks that operate flawlessly all of the time. That wish, however, does not justify regulatory intervention of any sort and certainly not intervention which would require T-Mobile (and the other carriers) to rebuild, reimagine and redesign their networks.¹²

B. The Record Confirms that the PUMA Network Availability Standard is Flawed on Every Level

The Comments on the Staff Proposal’s recommendation to mandate a daily 99% PUMA Availability Standard reveal the multitude of issues it creates. Even those parties who “support” the recommendation, seem to do so conditionally.¹³ In any event, the record confirms that the

fixed service, enable a consumer to stay connected beyond their residential or billing address.”).

¹¹ See, e.g., n. 5, *supra*.

¹² See, e.g., T-Mobile Opening Comments at 38-39 (estimates for one-time and annual recurring incremental compliance costs); *id.* at Attachment C (Consalvo Estimated Cost Compliance Declaration and Workpapers); see also CTIA Opening Comments at 37 (illustrating that the aggregated annual compliance cost for the Cal OES Community Isolation Outage Standard would be “\$6.214 billion, plus \$16.791 billion in one-time costs...” (footnote omitted)).

¹³ See, e.g., Cal PA Opening Comments at (“Though Cal Advocates supports the core framework, the Commission should clarify the definition of “network availability”...”); SUBA Opening Comments at 5 (“SUBA appreciates Staff’s commitment and recommends the Commission require that PUMA-level network availability data be cross-referenced against the Commission’s existing ESJ community designations from the outset.” (footnote omitted)); and RCRC/CforAT Opening Comments at 5 (generally supporting the Staff Proposal’s PUMA Standard but noting concerns with larger PUMAs which include more than one county).

proposal is fatally flawed at every turn and neither the Staff Proposal nor the Comments address those flaws.

As an initial matter, the premise of the PUMA Standard flies in the face of the record. The Staff Proposal asserts that the PUMA concept was designed to address the concern that “[w]ireless carriers monitor key performance indicators, such as statewide network availability on an annual basis” and that this alleged “high-level reporting” is problematic.¹⁴ Those statements, however, are completely inconsistent with the record. First, T-Mobile monitors its network on a 24/7/365 basis, not on an annual basis.¹⁵ Indeed, as it explained in April, T-Mobile data is collected on frequent and regular basis and is aggregated due to the sheer volume of information collected.¹⁶ In addition, the carriers already provide Cal OES with outage reports on the ZIP Code level, a far more granular basis than a PUMA. Finally, the variability of the size and geographic scope of PUMAs is so broad that even parties who generally support the Staff Proposal acknowledge there is an issue.¹⁷

¹⁴ See Staff Proposal at 27-28 (“Wireless carriers monitor key performance indicators, such as statewide network availability on an annual basis. As advocacy panelists noted at the workshop, this high-level reporting structure obscures which communities experience outages, masks chronic failure areas, and leaves emergency responders with insufficient outage information.” (footnote omitted)).

¹⁵ See, e.g., T-Mobile’s Response to Additional Information Requests at 14 (“As discussed most recently at the Workshop, T-Mobile does not wait for outages to happen. It uses 24x7x365 monitoring, advanced analytics and a host of tools/strategies (e.g., overlapping coverage, automated site adjustments, COWs, COLTs, satellite technology, etc.) to try and maintain reliable service to customers and first responders at all times.” (footnote omitted)); see also T-Mobile’s Response to Additional Information Requests at Appendix B, Attachment RIR1-01 (T-Mobile Workshop Session 3 PowerPoint) at Slide 3.

¹⁶ See, e.g., T-Mobile’s Response to OIR Information Requests at 10 (“That said, there are performance metrics for essentially every aspect of the network as well as customer-facing interactions. Data is generally collected on a frequent and regular basis and then aggregated on various levels including but not limited to geographic scope (e.g., cell site, market, region, etc.) and time (e.g., minutes, hours, days, months, quarter, year). Given the volume of data collected, the more granular data is replaced with the more aggregated data with the passage of time. In sum, there are a myriad of metrics used by T-Mobile to measure its performance and the service it provides to subscribers.”).

¹⁷ See e.g., Cal PA Opening Comments at 3 (tacitly supporting the use of PUMAs but acknowledging that data at that level would likely need to be examined at a more granular level); see also TURN Opening Comments at 7 (“...TURN recommends the use of smaller geographic units for the Network

In addition, the Non-Wireless Parties do not justify their support for the PUMA recommendation on the basis that there is some issue or problem that would be solved by its mandating this standard.¹⁸ Instead, they rely on Staff Proposal’s justification addressed above and the assertion that it would allow it to gather information to potentially identify problems on such topics as, according to the Staff, “vegetation management compliance.”¹⁹ In other words, the information might provide the Commission with information about issues that are unrelated to this proceeding or to service quality in any way but that does not – and cannot lawfully - substitute for a record establishing a need for regulatory involvement. None of the Commenters offer any other bases to suggest that daily network availability of 99% measured by PUMA addresses some issue identified in this record.

Essentially all of the Party Comments confirm that the PUMA Network Availability standard is not yet fully developed. As the Staff acknowledged, and as universally recognized, the Staff Proposal does not define “network availability” and the concept is unclear to all the

Availability Standard.”); and RCRC/ CforAT Opening Comments at 5 (“The exception is for those PUMAs that cover very large geographical territories, particularly those that have scattered (and small) population centers.”).

¹⁸ See, e.g., Cal PA Opening Comments at 4 (asserting – without reference to any evidence or analysis, that “[a] 99% availability threshold is a reasonable and enforceable baseline.”).

¹⁹ See, Staff Proposal at 28. See also e.g., TURN Opening Comments at 6 (“As a threshold matter, TURN greatly appreciates the Staff Proposal examining network performance at a more granular level than statewide and for shorter time intervals than performance averaged out over a year.” (footnote omitted)).

stakeholders.²⁰ Indeed, the Staff was unable to explain its own standard in the recent Workshop and none of the Non-Wireless Parties do either.²¹

Instead, as the Wireless Party Comments noted, the Staff seems to have manipulated the data – to suggest there is some PUMA-based issue - by aggregating Cal OES Reports across three years and three carriers in PUMAs with multiple ZIP Codes.²² This “data” should be seen for what it is – meaningless. Indeed, AT&T’s addressed this false narrative fully.²³ In addition, T-Mobile’s analysis of its Cal OES Reports in the ZIP Codes within the Staff’s PUMA selections also indicates that the annual aggregated network uptime for those ZIP Codes – by PUMA –

²⁰ See, e.g., Cal PA Opening Comments at 4 (“The Commission must establish a clear definition of network availability beyond the operational up-time formula provided in the Staff Proposal.”); TURN at 8 (“Staff stated at the Workshop that the Network Availability Standard is the measure of the minutes that a carrier’s wireless network “is available divided by the total minutes in that time period,” but that mathematical formula alone does not confirm what Staff intends the Network Availability Standard to measure—or what a network being “available” means. TURN recommends creating a word-based definition to develop this standard and ensure that the Commission and stakeholders all understand what the Network Availability Standard is intended to measure.” (footnote omitted)).

²¹ See Staff Proposal Workshop Recording at 01:13:38 (Q-AT&T counsel Raymond Bolanos (“Bolanos”): “What has to happen for a network to become unavailable in a PUMA?”), at 01:14:12 (“Say I [have] ten cell sites in a PUMA. How long does one site have to go down for [the network to become unavailable]?”), A – Lai: “...Obviously that calculation would be confined within that polygon of a PUMA to determine what the network availability is. I am not an engineer so I cannot go into specific details...”), and at 01:15:56 (A- Director Osborn “...I think this is something we need to consider in terms of how to further measure that.”). T-Mobile notes that there is no official transcript of the Workshop and that it has attempted to identify these statements based on the recording alone. See link at: <https://www.youtube.com/watch?v=ognzj9jDSV4>

²² See AT&T Opening Comments at 29-32 (section demonstrating that “The Proposal Inflates Outage Numbers in More Remote Areas of California by Aggregating Multiple Zip Codes into PUMAs.”); see also T-Mobile Opening Comments at 22 (“Leaving aside the obvious fact that combining such data in that way over a three year period is arbitrary and otherwise going to increase number counts (and should be dismissed on its face as it is not a legitimate measure of anything),...” (footnotes omitted)).

²³ See AT&T Opening Comments at 29-32 (demonstrating that “[t]he Proposal Inflates Outage Numbers in More Remote Areas of California by Aggregating Multiple Zip Codes into PUMAs.”); see also *id.* at 28 (“Though Staff point to the PUMA that includes Mariposa County as an example where improved Network Availability by PUMA is needed, Mariposa County Supervisor Kiser (at the July 15, 2026 PPH) stated that “[w]e have a wireless system that actually works quite well. . . . Wireless service today is already affordable for small businesses and families like mine, especially in remote quarters of our state, without a single new rule from the Commission.” (footnotes omitted)).

exceeds 99% in each year.²⁴ Perhaps most strikingly, the data to undertake this analysis was readily available to the Staff so it either chose not to do the analysis or otherwise did the analysis and chose not to disclose it in the Staff Proposal.²⁵ In either event, the record confirms that the PUMA Network Availability Standard is another solution in search of a problem.

Finally, neither the Staff Proposal – nor any of the Non-Wireless Parties – credibly suggest how mandating a daily 99% PUMA Network Availability standard (however measured) would provide any meaningful benefit to Californians or how it could justify regulatory intervention of any sort and certainly not intervention which would penalize carriers for non-compliance with an undefined standard and otherwise require T-Mobile (and the other carriers) to rebuild and redesign their networks.²⁶

C. The Record Confirms that Wireless Customer Care is Robust and Responsive to Consumer Demands

The Non-Wireless Parties also uniformly support all of the Staff Proposal's recommendation to impose Customer Care Standards.²⁷ Once again, these parties do so without

²⁴ See Declaration of Andy Gormley (PUMA) at ¶¶ 4- 5 included as Confidential Attachment B.

²⁵ See e.g., Staff Proposal Workshop Recording at 01:16:29 (Q - Bolanos: "Have you analyzed what the average uptime is in each PUMA as a basis for the staff proposal?"; A-Lai: "I don't believe that data was ever provided. All the uptime information that we can find is basically from what you guys presented and it is a lot of it is the public sites...").

²⁶ See T-Mobile Opening Comments at 38-39 (estimates for one-time and annual recurring incremental compliance costs); see also *id.* at Attachment B (Sherry Estimated Compliance Cost Declaration at ¶¶ 26 - 35); CTIA Opening Comments at 37 (illustrating that the aggregated annual compliance cost for the Network Availability by PUMA Standard would be "\$6.1 billion, plus \$16.791 billion in one-time costs...")(footnote omitted)).

²⁷ See Cal PA Opening Comments at 1 (recommending that the Commission "[a]dopt the Customer Service Standard in the Staff Proposal..."); TURN Opening Comments at 11 ("TURN...supports the proposed requirements to maintain a contact line for customers to reach 24/7, the requirement that billing inquiries be resolved within 90 days, and the requirement for a customer representative to answer 80% of customer service calls within 60 seconds."); RCRC/CforAT Opening Comments at 6 ("RCRC and CforAT generally support the Commission's objective of ensuring that wireless consumers receive customer service protections that are reasonably comparable to those provided to customers using other voice technologies, such as wireline options.").

any consideration of the actual record before the Commission, or without making an attempt to build or challenge that record with competent evidence.²⁸ The support seems to be based on little more than (i) the fact that some of these same obligations have been imposed on wireline and VoIP providers and (ii) a desire to gather information about whether there is some issue with wireless customer care operations and generalized speculation about what that information *could* reveal.²⁹ Indeed, none of these parties suggest there is any evidence to undermine the Staff Proposal unambiguous statement that the wireless providers “...already operate sophisticated customer service systems.”³⁰

1. 24/7 Customer Care Line with Answering Machine

The recommendation to require wireless providers to provide a 24/7 customer care that is staffed from 9:00 am – 5:00 pm PST Monday to Friday and to provide an answering machine (or answering service) to handle after hours calls not only ignores the reality of wireless customer

²⁸ SBUA Comments do attach points to a JD Power Wireless Satisfaction Study to suggest that the Commission should consider some type of “problem-resolution metric”. See SUBA Opening Comments at 7-10 (discussion regarding metric) and at Attachment A (J.D. Power 2026 U.S. Wireless Carrier Satisfaction Study – Volume 1). The reference to the JD Powers study is striking in several respects. First, it supports the notion that such metrics already exist. Second, SBUA fails to cite the more recent study which reflects a marked increase in that metric for wireless to record-setting levels. See link at <https://www.jdpower.com/business/press-releases/2026-u-s-wireless-carrier-satisfaction-study-volume-2/>. Third, the JD Power’s study does not reflect the existence of a problem that requires regulatory intervention nor does it explain how such a metric would provide any customer benefits.

²⁹ See, e.g., Staff Proposal at 23 (“However, internal customer service systems do not provide the Commission with comparable information about whether automated systems delay access to live representatives, whether customer service performance varies by carrier or community, or whether outage and service quality complaints are resolved in a timely manner.”); see also n. 27, *supra*.

³⁰ See Staff Proposal Workshop Recording at 02:04:53 (Q – T-Mobile counsel Stephen Kukta (“Kukta”): “Has staff done any research to suggest that California customers are dissatisfied with their wireless carriers customer care?”; A – Lai: “...if you guys have done some research, we welcome you guys to put those in comments.”); see also Staff Proposal at 23 (“The carriers’ customer service claims show that they already operate *sophisticated customer service systems* but those internal systems do not provide the Commission with standardized, comparable information about whether customers can reach assistance to get their issues resolved.” (emphasis added)).

care operations today, it is a throwback to another time altogether. Indeed, such mandates are completely at odds with the record and consumer demands.³¹

For example, the record is clear that an ever-increasing number of customers desire and demand a host of automated options to address their inquiries. When they want to talk to a live representative, they want to talk to the one who has the expertise to actually deal with their inquiry; not just the person they can speak to first. To that end, for example, T-Mobile currently provides customer care, including the option to speak with live representatives, from 4:00 am – 9:00 pm seven days a week, as well as live-chat option from 4:00 am – midnight seven days a week and automated chat 24/7.³² The other providers offer similar hours.³³

Neither the Staff nor any of the Non-Wireless Parties rely on any evidence to suggest that somehow the vintage 9-5, M-F paradigm, with an answering machine for after-hours calls, is

³¹ See AT&T Opening Comments at 55 (“Wireless customer care is nationwide, multi-channel, and dynamic. Customers may use phone, chat, digital self-service, retail stores, apps, callbacks, and other tools.”); Verizon Opening Comments at 10 (“As explained throughout this proceeding, the wireless industry offers a variety of competitive offerings and options for consumers. Unlike traditional wireline customers who generally are confined to speaking with their provider by phone, wireless customers can communicate with their providers in myriad ways, including phone, text, chat, and through messages via their phone apps.” (footnote omitted)).

See also T-Mobile’s Response to Additional Information Requests at 20 (“As discussed at the Workshop, T-Mobile’s customers want various pathways to get information when they have inquiries and that those pathways can vary depending on the nature of the inquiry. Thus, T-Mobile’s Customer Care is built on providing customers with the options that best fit their needs – to meet the customer where they are.” (footnote omitted)).

³² See “Want to Get in Touch?”, T-Mobile at <https://www.t-mobile.com/contact-us>. See also T-Mobile’s Response to Additional Information Requests at Appendix B, Attachment RIR_3-01 (T-Mobile Workshop Session 1 PowerPoint) at Slide 4 (“Extended Hours: 4am–9pm PDT, 7 Days... T-Mobile operates care 17 hours/day (4am–9pm PDT), 7 days/week. During the remaining 7 overnight hours, customers are directed to digital self-service options. This flexible approach serves diverse needs—prescriptive “one-size-fits-all” mandates could undermine it.”).

³³ See “Contact Us”, Verizon at <https://www.verizon.com/digital/nsa/nos/ui/ngd/contactus> (Verizon’s hours); see also “AT&T Wireless support”, AT&T at <https://www.att.com/support/wireless/> (AT&T’s wireless customer care hours).

preferred by customers. Nor is there evidence to suggest that there is any issue with the carrier's unequivocally expansive customer care hours and options today.

Nonetheless, the Staff recommendation – supported by the Non-Wireless Parties - would impose fines on carriers for not adopting this archaic model of customer care or otherwise force them to modify their operations at great expense.³⁴ Such a result directly conflicts with the Commission's explicit directions in this docket.

2. 80/60 ASA

Similarly, the Non-Wireless Parties ignore the uncontroverted evidence that although Average Speed of Answer (“ASA”) is still in use, it is generally recognized as an inadequate proxy for customer experience, especially in today's world where customer care is available through so many channels and, unlike traditional landline, encompasses such a broad range of inquiries from consumers.³⁵ In addition, these commenters disregard that to the extent ASA is used, it is at most used as an average which provides but one metric for evaluating overall performance, not a strict standard to be applied to all calls with penalties.³⁶

As noted above, the Non-Wireless Parties also disregard the fact that the Staff Proposal itself explicitly acknowledges that the carriers operate “sophisticated customer care

³⁴ See, e.g., T-Mobile Opening Comments at Confidential Attachment C (Cost Estimate Declaration of John Consalvo with Summary and Workpapers).

³⁵ See, e.g., T-Mobile's Response to Additional Information at 20 (“...although Average Speed of Answer (“ASA”) is still used as one metric for evaluating customer service, it is generally recognized as an inadequate proxy for customer experience, especially in today's world where customer care is available through so many channels and, unlike traditional landline, encompasses such a broad range of inquiries from consumers.”).

³⁶ *Id.* at 20 (“...ASA's are not meant to set an inflexible or rigid standard; they are meant – by definition – to provide an *average* which provides some insight into one particular element of customer care. Thus, for example, ASAs can account for the benefits of maintaining flexibility in a customer care operation to provide, for instance, priority routing in emergency situations as T-Mobile did for calls from California customers during the Los Angeles wildfires last January as discussed at the Workshop. To that end, ASA is just one factor that T-Mobile considers in evaluating its Customer Care operations.”).

operations.”³⁷ They embrace the Staff’s justification for the adoption of the Customer Service Standards, which generally rests on little more than its apparent desire to gather information about whether there is some issue with those operations and broad speculation about what that information could reveal.³⁸

i. Modification – First Prompt

Again, the Non-Wireless Parties simply and uniformly support the Staff’s recommendation that ASA’s be measured from the time a customer chooses to speak with a live care representative conditioned explicitly on customers being provided an opportunity to speak to a live agent upon a “first prompt.” This dismisses the record on consumer trends. For example, there is no dispute that an ever-increasing number of customers prefer automated options (IVR, chat, web access) to address the simpler matters around billing, activation, and the like. Moreover, for those customers who want to speak to a live representative, customers want first and foremost to get to the most appropriate service representative with the proper expertise to address their concern; not just the one they can get to most quickly.

The Staff Proposal attempts to minimize the potential impact of such a proposal but calling it a “clarification.”³⁹ The Staff, itself, however, could only speculate on what the “clarification” meant or whether current carrier practices were consistent with its

³⁷ Staff Proposal at 23 (“The carriers’ customer service claims show that they already operate *sophisticated customer service systems* but those internal systems do not provide the Commission with standardized, comparable information about whether customers can reach assistance to get their issues resolved.”(emphasis added)).

³⁸ See Staff Proposal at 23 (“However, internal customer service systems do not provide the Commission with comparable information about whether automated systems delay access to live representatives, whether customer service performance varies by carrier or community, or whether outage and service quality complaints are resolved in a timely manner.”).

³⁹ See Staff Proposal at 43 (“Staff recommends that the Commission adopt all five Customer Service Standards criterial for wireless service, with the following two clarifications.” (footnote omitted)).

recommendation. Indeed, the Staff apparently did not conduct a survey of existing carrier practices to determine how current IVR systems operate or make the effort to call the carriers' customer care lines themselves. Instead, the recommendation is apparently built on an antiquated notion of providing consumers with a list of prompt options (e.g., "choose '1' if you want to talk to technical support").⁴⁰ The evidence, however, is clear: modern systems generally direct incoming calls to the appropriate care channel based on a *customer's voice-description* of their inquiry. Moreover, the record confirms that today's technology is beginning to use and refine predictive modelling to anticipate the likely reason for the customer's call and get them to the appropriate care channel even more quickly.⁴¹

Moreover, as T-Mobile Comments make clear, this "clarification" has massive implications for estimated compliance costs⁴² and all to no end or any benefit to consumers.

ii. Modification – 30 Minute Callback

As with the proposed mandate for "first prompt", the Staff Proposal – as well as the Non-Wireless Commenters – attempt to minimize the impact of a mandate for a 30-minute callback for wireless providers.⁴³ Neither the Staff, nor any party, suggest a remotely credible basis for

⁴⁰ The Staff Proposal itself offers no guidance and the Staff's explanation at the Workshop seems to be predicated on an outdated vision of how customer care operates. *See, e.g.*, Staff Proposal Workshop Recording at 01:38:52 (Lai: "We want the 60-second response window to start from the point when a customer opt to speak with a...customer service representative...the last thing we want is to people go through a bunch of prompts...before they could choose to speak with somebody.") and at 01:58:31 (Q - Kukta: "... what does at the first prompt mean to the staff?"; A – Lai: "I think it means when you call you get...multiple options and we just want those options to include the option to speak with a live representative.").

⁴¹ *See, e.g.*, T-Mobile's Response to Additional Information Requests, Appendix B, Attachment RIR_3-01 (T-Mobile PowerPoint for Session 3 Workshop Panel) at Slide 3 ("AI-Powered Predictive Routing...T-Mobile uses AI to route each caller to the right specialist based on their account and history—reducing transfers and getting to a resolution faster.").

⁴² *See, e.g.*, T-Mobile Opening Comments at Confidential Attachment C (Cost Estimate Declaration of John Consalvo with Summary and Workpapers); *see in particular*, *id.* at ¶ 18.

⁴³ *See* Staff Proposal at 44 (referring to the 30 Minute Callback Modification as "Clarification #2").

such an onerous mandate. Indeed, the Staff's and the Non-Wireless Parties' reliance on a solitary comment made by one of the Intervenor's representatives to support this concept turns out to be – by the Intervenor's own clarification – nothing more than the representative talking about a statement posted on a public website made by an unknown person.⁴⁴ In other words, the recommendation is based on a statement which is at best hearsay upon hearsay upon hearsay – not credible evidence by any measure.

Moreover, as discussed both at the Workshop and in Opening Comments, this proposed mandate does not make any sense even on the most practical level.⁴⁵ It is nothing more than a

T-Mobile further notes that Staff's justification of the "feasibility" of the modification rests entirely on Verizon's Workshop Panelist's description of a scheduled call back capability and IVR systems – nothing to do with the strict 30 minute standard. *See* Staff Proposal at 44 ("Connie Chaffins, representing Verizon, testified that scheduled callback functionality is already standard industry practice and that carriers work to ensure their IVR systems route customers to an appropriately trained agent once contacted, supporting the feasibility of a shorter callback window." (footnote omitted)).

⁴⁴ *See* Staff Proposal at 44 ("Regina Costa of TURN provided a specific example describing a call to one of the major carriers where she spent most of a 15-minute call on hold while the representative searched for her account information."). *See also* TURN Opening Comments at 13 ("The Staff Proposal incorrectly attributed the example to Ms. Costa's personal experience. The example Ms. Costa provided was from a June 22, 2026, post from a customer to the Trustpilot website, titled "Worst Service Ever" and was not Ms. Costa's personal experience." (footnote omitted)).

⁴⁵ *See e.g.* AT&T Opening Comments at 11 ("In light of the first-prompt IVR mandate, a 30-minute callback window is operationally impractical and would impose enormous wait times for customers."); *see also* CTIA Opening Comments at 19 ("The Staff Proposal assumes that, because wireless providers testified that scheduled callback functionality is already standard industry practice, and providers "work to ensure their IVR systems route customers to an appropriately trained agent," the shorter window should be feasible." (footnote omitted)).

See e.g., CTIA Opening Comments at 37 (illustrating that the aggregated annual compliance cost for the Customer Service Standard to be "\$669.2 million-\$1.1 billion, plus \$66.75-\$68.25 million in one-time costs... without fully accounting for all costs" (footnote omitted)).

Cal PA's attempt to reinsert a chat mandate with a 10-second window for reaching live customer care has no basis other than the fact that it was part of a proposed recommendation – that was not adopted – in the prior proceeding. *See* Cal PA Opening Comments at 8. The only other "basis" for this proposal is based on the single statement attributed to PPH participant which has no relation to either the callback requirement or chat bots. *See* T-Mobile Opening Comments at 27.

concept created by Staff, and now supported fully by the Non-Wireless Parties without any basis in fact or customer experience at all.⁴⁶

3. Miscellaneous Customer Care Recommendations

The Non-Wireless Parties also uniformly support the other Customer Care recommendations in the Staff Proposal without any consideration for whether there is an issue that needs to be addressed. Such comments should be afforded no weight.

For example, the Non-Wireless Parties support the imposition of the 90-day billing related inquiry resolution (or shorter) despite the fact that the record is devoid of any suggestion that wireless customer inquiries in general – or those related to billing issues – are somehow not being resolved in a timely manner.⁴⁷ The evidence, however, is to the contrary. Wireless carriers seek to resolve inquiries in a single call regardless of the issue.⁴⁸

The Non-Wireless Parties also apparently support the Staff Proposal recommendation to require that “[a]ll outage-related inquiries must be directed towards the appropriate wireless standards”⁴⁹ even though the meaning and implication of this recommendation is unclear.⁵⁰

⁴⁶ See Staff Proposal Workshop Recording at 02:09:25 (Q – Verizon Counsel Melissa Slawson (“Slawson”): “So regarding the 30-minute call back, I just wanted to see what analysis staff has done to determine that ... 30 minutes was the correct standard.” A – Lai: “I mean, if I could put five minutes, I would...”).

⁴⁷ See, e.g., TURN Opening Comments at 11 (stating support for “...the requirement that billing inquiries be resolved within 90 days...”).

Some of the Non-Wireless Parties even suggest shortening the proposed resolution time without offering any evidence that there is an issue with current customer care practices. See e.g., Cal PA Opening Comments at 8 (“Additionally, the Commission should require providers to resolve billing-related inquiries within 45 days of the initial customer inquiry...”); see also SUBA Opening Comments at 6 (“...SUBA recommends the Commission adopt a 30-day resolution window.”).

⁴⁸ See, e.g., AT&T Opening Comments at 3 (“AT&T’s customer experience focuses on resolving the customer’s issue in a single call as opposed to emphasizing simply reaching a live representative within 60 seconds (which does not ensure any actual resolution, in any case).”)

⁴⁹ See, e.g., Cal PA Opening Comments at 1 (recommending that the Commission “[a]dopt the Customer Service Standard in the Staff Proposal, including clarifications [not relevant to this issue]...”).

⁵⁰ See e.g., TURN Opening Comments at 14 (“TURN recommends clarifying the requirement that ‘all

D. STAFF PROPOSAL RECOMMENDATION – PROPAGATION MAPPING

The Non-Wireless Parties support of the Staff Proposal recommendation regarding propagation mapping is similarly uniform and similarly contrary to the record evidence in this proceeding.⁵¹ Although all these Commenters seem to believe that somehow consumers would be better served if the carriers each issued propagation maps using uniform standards across all technologies,⁵² they all ignore the undisputed evidence that establishes, among other things:

- As the FCC has recognized in the context of creating broadband maps, there are no such uniform standards as measured Reference Signal Received Power (“RSRP”) or Received Signal Strength Indicator (“RSSI”) – which can be expressed in dBm - can have different practical implications depending on the “spectrum band, the provider's network design and link budget, and the capabilities of the customer's device.”⁵³
- The idea of promulgating maps for broad consumer consumption based on standardized -dBm levels was considered and rejected.⁵⁴

outage-related inquiries must be directed towards the appropriate wireless standards’ ...”).

⁵¹ See TURN Opening Comments at 14 (“TURN supports the requirement for carriers to provide signal propagation maps on public websites where they advertise or provide wireless coverage maps. This information is important for consumers, who need accurate information about the quality of service at their home, or other locations where they need service to be available.”); Cal PA Opening Comments at 9 (“The Staff Proposal’s inclusion of wireless signal propagation maps using decibelmilliwatts (dBm) and Reference Signal Received Power (RSRP) substantially improves consumer protection in wireless service.”(footnote omitted)); SUBA Opening Comments at 10 (“SUBA supports the Staff Proposal’s requirement that wireless carriers publish signal propagation maps using Reference Signal Received Power (RSRP) thresholds...”); and RCRC and CforAT Opening Comments at 10 (“RCRC and CforAT not only support the use of signal propagation maps...”).

⁵² See, e.g., Cal PA Opening Comments at 10 (“Cal Advocates has proposed the minimum standard that will aid in allowing consumers to make an informed choice when deciding which wireless carrier to subscribe to so that there is a clear expectation of where they are most likely to have wireless service,...”).

⁵³ See, e.g., In re Establishing the Digital Opportunity Data Collection, *Third Report and Order*, FCC 21-20, ¶¶ 37 (2021) (“The Commission has recognized that RSRP or RSSI values may vary based on factors such as the spectrum band, network design, and device operating capabilities.”); see *id.* at ¶ 59, n. 189 (“[S]pectrum band data are essential to understanding and analyzing mobile providers’ on-the-ground submissions, including measurement data and network performance, because signal strength values may vary based on the particular band in use.”).

⁵⁴ The FCC does require carriers to provide information at dB level data in 10 db increments (see *Third Report and Order* at ¶ 37) but its broadband mapping is not based on dBm for the reasons discussed above. Indeed, that dBm-specific information – generally referred to as “heat” maps” - is also publicly

- Propagation maps with -dBm levels are not guarantees of service levels; they are based on engineering modeling and would require the same type of caveats as current maps available on carrier websites.⁵⁵
- Publicly available mapping websites are already available which provide consumers with the ability – at street level – to see FCC Signal Strength Maps, Crowdsourced Maps and Heat-sourced maps *with projected dBm levels clearly disclosed*.⁵⁶ In addition, this site allows consumers to compare across carriers and even to get recommendations for the best plans in the area.⁵⁷
- Real-world experience with a particular carrier is the only means to determine whether a particular service serves a consumer’s unique needs. To that end, there are no more long-term contracts (nor have there been for years) and all the major carriers provide test periods to consumers so they can assure themselves that their service is well-suited to their demands.⁵⁸

In brief, beyond relying on a few unsubstantiated statements made at the PPHs, the Non-Wireless Parties do not suggest there is any consumer demand to warrant the imposition of a different type of mapping or that such mapping would serve a particular purpose that is not already available to the public in more fulsome manner. Instead, they rely on the unsupportable

available as discussed below.

⁵⁵ See, e.g., Verizon Opening Comments at 24 (“Propagation maps are *predictive* models, created by engineers for network design to show the likely coverage of a proposed wireless facility. While they may be used in connection with permitting applications like AT&T’s, these maps are *not designed to measure existing* indoor voice coverage.”); see also T-Mobile Opening Comments at 32 (“...while an exact dBm heat map may appear more precise than an ordinary coverage map, greater numerical precision *does not* necessarily produce greater accuracy about the consumer’s expected experience.”).

⁵⁶ See <https://map.coveragemap.com/> (The map reflects third-party reporting of coverage. The map icon to the right of the search box allows the user to toggle between maps, including the Crowdsourced map – real-time customer data and the FCC Signal Strength map – the FCC National Broadband Map data with dBm value.); see also link at <https://broadbandmap.fcc.gov/home> (includes downloadable “heat maps” for each carrier as well as FCC Broadband Mapping Tool).

⁵⁷ See Coverage Map.com at <https://coveragemap.com/> (can search by region (California) or specific location for a map view and provider comparison).

⁵⁸ See T-Mobile free trial page at <https://www.t-mobile.com/support/coverage/t-mobile-trial> (allows customers to test T-Mobile’s network for free for up to 30 days) and at <https://www.tmobile.com/offers/free-trial> (“This isn’t just a network test drive. Get access to the Best Mobile Network in the U.S., with satellite coverage, member benefits, and the full T-Mobile experience, all free for 30 days. No credit card. No credit check. And no commitment.”).

See also AT&T free trial page at <https://www.att.com/wireless/free-trial/> (30-day free trial), and Verizon free trial page at <https://www.verizon.com/plans/free-trial/> (same).

assertion that consumers need such information to determine whether they have indoor coverage and that such a map would be “superior” to what it currently on the carrier websites.⁵⁹ This is demonstrably untrue. The propagation maps suggested by the Staff Proposal would be misleading and almost certainly confusing and consumers seem to have no problem deciding for themselves whether their coverage meets their needs. Leaving aside the fact that test periods, and the freedom to readily switch carriers (i.e., no long-term contracts and portability), already allow consumers to choose the service that best meets their needs, it seems incredible on its face that the millions of California consumers who choose to utilize wireless service do not know if it works where they need it most.⁶⁰

Indeed, the Non-Wireless Parties suggest a lock-step approach to mapping which would require all carriers to use the same colors and the same metrics regardless of the fact that the dBm levels proposed by Staff do not reflect the carriers’ engineering models or the fact that each carrier is closely associated with – and easily identified by - distinct colors (magenta, red and blue).

⁵⁹ See Staff Proposal Workshop at 02:52:14 (Osborn: “... if you do have information you believe is superior to what we’re proposing here [with respect to standardized propagation maps], we’re definitely open to hearing about it.”; Bloomfield: “...Director, it’s not a matter of superior, it’s different information. So, I think that’s what’s important...it’s different information... There’s lots of ways to do this.”).

⁶⁰ Cal PA’s Opening Comments go as far as to suggest that providing standardized maps is actually a public safety concern because consumers “have the right to know whether they can place a 911 call from inside their home *before* they sign up for a wireless service whether they can place a 911 call from inside their home *before* they sign up for a wireless service...” See Cal PA Opening Comments at 11 (emphasis in original). This statement is not only untethered from the record of what information is provided by propagation maps, how those maps could be used responsibly, how 9-1-1 service works or how consumers choose their service, it also unfairly and inaccurately undermines consumer confidence in wireless services.

In sum, to mandate that T-Mobile, or any other carrier, represent to consumers that certain dBm levels dictated by Staff would equate to a certain level of coverage is not only unnecessary, it would also be misleading and unlawful.⁶¹

III. CONCLUSION

For the reasons set forth above, and based on the record developed in this Proceeding, T-Mobile requests that the Staff Proposal be rejected in its entirety. T-Mobile notes, however, that it fully supports the concept of working more closely with Staff and the Commission on a regular basis to provide additional information about its services and address any concerns that may arise.

Respectfully submitted this 15th day of September, 2026.

/s/
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⁶¹ The proposed requirement for providers to create and publish color-coded "signal propagation" maps raises serious concerns with compelled speech that would violate the First Amendment. *NIFLA*, 585 U.S. at 756; *Bonta*, 113 F.4th at 1120; 47 C.F.R. §§ 22.983, 27.55, 27.57(b), 1.923(f), 90.619; *Nat'l Ass'n of Mfrs. v. SEC*, 800 F.3d 518, 524, 530 (D.C. Cir. 2015); *Central Hudson*, 447 U.S. at 566; *Zauderer*, 471 U.S. at 651.

Confidential Attachment A

[Confidential as Marked per Protective Order]

Declaration of Andy Gormley

I, Andy Gormley, declare as follows:

1. I am a Member of Technical Staff Regulatory Compliance 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 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) (collectively "T-Mobile").
2. I submit this Declaration in Support of the Reply Comments I understand will be filed by T-Mobile and by CTIA as part of an effort to provide industry-aggregated data to the Commission with respect to (i) Cal OES Community Isolation Outage Report data previously submitted by T-Mobile for the years 2020-2025 and (ii) outage causation data previously submitted by T-Mobile for 2023- 2025.

Cal OES Data

3. I have reviewed the information previously provided as Confidential Attachment GIR 7-1 (both in the redacted and unredacted format) and Confidential Attachment GIR 7-1 Supplemental (collectively the "T-Mobile Cal OES Report Data") and verify that the information provided below is true and accurate.
4. The information contained in the T-Mobile Cal OES Report Data consisted of a summary of data contained in Community Isolation Outage Reports submitted by T-Mobile to the California Office of Emergency Services for the period June 26, 2020 through December 31, 2025.
5. The data was collected by a third-party vendor from a set of Reports I personally maintained that included, among other things, what I believe to be copies of submitted Cal OES Reports. In the normal course, copies of those reports are also sent to my attention.
6. The T-Mobile Cal OES Report Data contained detailed information on each impacted ZIP Code that was identified in one of the Initial and Final Cal OES Reports submitted during the time frame noted above and incorporated data fields for each impacted ZIP Code identifying a unique identification number(s),¹ outage start time and date, resolution time, the identity of impacted ZIP Codes associated

¹ As noted in my prior declarations in this Proceeding, T-Mobile had to use different methodologies for identifying the ZIP Codes impacted before and after April 14, 2022 because of a change in reporting format. After April 14, 2022, Initial and Final Reports were identified by a single Identification Number. That was not the case prior to that time. I also note that T-Mobile separately identified a limited number of Cal OES Initial Reports for which it has yet been unable to locate a Final Report (and thus has no outage duration information) as well as a set of unique reports tied to NORS 911 Reports. None of that data is included in the analyses discussed above.

with Cal OES Identification number, and the calculated duration time of the coverage degradation that triggered the reporting.

7. I have reviewed a summary of all of the T-Mobile Cal OES Report Data which I understand was provided on a confidential basis to a law firm representing CTIA for aggregation with data from other wireless providers. That summary, reproduced below, includes, for each complete year: (i) a count of all ZIP Codes impacted by a Cal OES Report,² (ii) the total duration of all those reported outages, (iii) an average duration per impacted ZIP Code calculated by dividing the total outage duration by the number of ZIP Codes, and (iv) an overall uptime percentage calculated by dividing the total outage duration by the total potential available time in a year across all ZIP Codes with T-Mobile coverage (i.e., total hours in a year x the number of ZIP Codes with coverage) and then subtracting that percentage from 100%.

Year	Count of ZIP Codes Affected	Sum of Outage Duration (Hours)	Mean Outage Duration	Uptime %
	[BEGIN CONFIDENTIAL]			
2021	████	████	████	████
2022	████	████	████	████
2023	████	████	████	████
2024	████	████	████	████
2025	████	████	████	████
				[END CONFIDENTIAL]

² A given ZIP code may be included in more than one Cal OES Report. For purposes of our analysis, each time a ZIP Code appears on a Report it is treated as a separate ZIP Code (e.g., if 94610 is included in two Cal OES Reports, it is counted as 2 ZIP Codes for these purposes).

8. I have reviewed a summary of all of the T-Mobile Cal OES Report Data which postdates October 1, 2022 when the reporting threshold was changed from 50% of a ZIP Code to 25%. At the same time, Cal OES also required carriers to provide estimated “coverage degradation” information on its Reports. Using that degradation percentage, the summary identified all those Reports which would have triggered the 50% threshold (i.e., those reported outages with estimated degradations greater than or equal to 50%).³ A summary of that analysis – using the same methodology as discussed above, is provided below in the confidential chart:

Year	Count of ZIP Codes Affected	Sum of Outage Duration (Hours)	Mean Outage Duration	Uptime %
	[BEGIN CONFIDENTIAL]			
2021	████	████	████	████
2022	████	████	████	████
2023	████	████	████	████
2024	████	████	████	████
2025	████	████	████	████
				[END CONFIDENTIAL]

Outage Duration by NORS Reports

9. I have reviewed a summary of all of the NORS Reports T-Mobile submitted to the Commission from 2023 through 2025 in an attempt to identify causation. Although NORS Reports contain, among other things, fields for what are referred to as Root Cause and Direct Cause as defined by the FCC, we have reviewed internal information which further describes the outage type in one of several categories.

³ If the degradation was blank for an identified ZIP Code, but we had duration (final), we assumed that the degradation was greater than 50% and included the associated ZIP Codes in that analysis to *be conservative*.

10. A review of that information is summarized in the confidential chart below:

Year	Power	TMUS Impaired Equipment	TMUS Planned Maintenance	Transport	Total
2023	[BEGIN CONFIDENTIAL] [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2024	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2025	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED] [END CONFIDENTIAL]

The Power category includes what we otherwise categorized as “Weather” as those are all based on disruptions to commercial power. Also, the analysis does not account for the [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] E-911 NORS outages over that same time period as those are based on 911-specific equipment outages (i.e., PSAP-related) and not on the same cell site outage metric in the Standard NORS Reports..

10. As was the case for the table in paragraph 7, I understand that the information in the summary tables in Paragraphs 8 and 9, above, was shared with Mr. Mark Settle at the law firm representing CTIA – on a confidential basis and pursuant to a common interest agreement – to be aggregated with data from other wireless providers.

I declare under penalty of perjury under the laws of California that the above is true and correct 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.

Executed this 15th day of September, 2026 in Frisco, Texas.

/s/
Andy Gormley

Confidential Attachment B

[Confidential as Marked per Protective Order]

Declaration of Andy Gormley

I, Andy Gormley, declare as follows:

1. I am a Member of Technical Staff Regulatory Compliance 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 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) (collectively “T-Mobile”).
2. I submit this Declaration in Support of the Reply Comments I understand will be filed by T-Mobile, in response to an Administrative Law Judge Ruling issued on or about August 19, 2026 regarding proposed recommendations in a Staff Proposal including, among other things, what is referred to as a Network Availability by Public Use Microdata Areas (PUMA) Standard (“PUMA Availability Standard) on the three national wireless companies including T-Mobile.
3. I have reviewed the ALJ Ruling and the Staff Proposal, and in particular the sections which I understand refer to this new PUMA Availability Standard (i.e., pages 40 – 42 of the Staff Proposal).
4. I have also reviewed an analysis of the T-Mobile’s Cal OES Community Isolation Report Data previously submitted in Confidential Attachment GIR 7-1 for the ZIP Codes that I understand are included within (either in whole or in part) in each of the four PUMAs referenced in the Staff Proposal. The analysis was designed to include only those ZIP Codes with geographic scope as those are the only ZIP Codes for which a Cal OES is required.
5. In particular, for each of the four PUMAs, the analysis took into account the total duration of all Cal OES Reported Outages in the year for the ZIP Codes in the PUMA. It then calculated an overall uptime percentage calculated by dividing the total outage duration in the PUMA by the total potential available time in a year across all ZIP Codes within that PUMA (i.e., total hours in a year x the number of ZIP Codes in the PUMA) and then subtracting that percentage from 100%. The results of that analysis is included below:

Year	Lake County – Mendocino Couty PUMA (Uptime %)	Nevada-Sierra Counties PUMA (Uptime %)	Alpine-Amador-Calaveras- Inyo-Mariposa-Mono- Tuolumne Counties PUMA (Uptime %)	South San Francisco – San Bruno – Brisbane PUMA (Uptime %)
Estimated Number of Zip Codes	43	21	77	7
	[BEGIN CONFIDENTIAL]			
2023	██████████	██████████	██████████	██████████
2024				██████████
2025				
				[END CONFIDENTIAL]

I declare under penalty of perjury under the laws of California that the above is true and correct 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.

Executed this 15th day of September, 2026 in Frisco, Texas.

/s/
Andy Gormley