



STATE OF CALIFORNIA

GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED

10/30/26

11:11 AM

R2602017

October 30, 2026

Agenda ID #24615
Quasi-legislative

TO PARTIES OF RECORD IN RULEMAKING 26-02-017:

This is the proposed decision of Commissioner Darcie L Houck. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's December 3, 2026 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties to the proceeding may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

/s/ MICHELLE COOKE
Michelle Cooke
Chief Administrative Law Judge

MLC:nd3
Attachment

Decision **PROPOSED DECISION OF COMMISSIONER HOUCK**
(Mailed 10/30/2026)

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

**DECISION ADOPTING SERVICE QUALITY RULES
FOR WIRELESS CARRIERS**

TABLE OF CONTENTS

Title	Page
DECISION ADOPTING SERVICE QUALITY RULES FOR WIRELESS CARRIERS	1
Summary	2
1. Background	2
1.1. Findings in Decision 25-09-031	4
1.2. Procedural Background.....	6
1.3. Submission Date	8
2. Jurisdiction	8
2.1. Positions of Parties	14
2.1.1. Industry Assertion of Preemption under 47 U.S.C. Section 332(c)(3)(A)	14
2.1.2. Industry Assertion of Field Preemption.....	17
2.1.3. Industry Assertion of Conflict Preemption.....	19
2.1.4. Response of Consumer Parties to Industry Assertions	19
2.2. Discussion.....	21
3. Issues Before the Commission.....	25
4. Community Isolation Service Standard	26
4.1. Positions of Parties	28
4.2. Discussion.....	32
5. Network Availability by Public Use Microdata Area Standard	33
5.1. Positions of Parties	36
5.2. Discussion.....	39
6. Community Isolation Outage and Network Availability Reporting and Monitoring Requirements	41
7. Signal Propagation Mapping Requirement.....	43
7.1. Positions of Parties	46
7.2. Discussion.....	53
8. Customer Service Requirements	57
8.1. Positions of Parties	60
8.1.1. Answer Time Requirement	62
8.1.2. Call Back Time	65
8.1.3. Billing Dispute Resolution Timeframe	66
8.1.4. Penalty Mechanism.....	66
8.1.5. Reporting.....	68
8.1.6. Other	68
8.1.7. First Amendment Arguments	69
8.2. Discussion.....	71

9. Economic Impacts	77
9.1. Costs to the Carriers	77
9.2. Costs to Ratepayers	79
10. Industry Legal Claims	81
10.1. Evidentiary Support	81
10.2. Economic Impact	82
11. Conclusion	83
12. Summary of Public Comment	83
13. Procedural Matters	84
14. Comments on Proposed Decision	84
15. Assignment of Proceeding	84
Findings of Fact	85
Conclusions of Law	88
ORDER	92

Appendix A – General Order 133-F

DECISION ADOPTING SERVICE QUALITY RULES FOR WIRELESS CARRIERS

Summary

This decision adopts service quality rules for wireless providers. In particular, the California Public Utilities Commission (Commission) revises General Order (GO) 133-E, which sets minimum service quality standards for wireline telecommunications services, to apply both customer service rules, as well as outage and network availability reporting. Finally, this decision requires the three facilities-based wireless carriers to include indoor voice coverage on their websites. General Order 133-F, which this Commission adopts, is contained in Appendix A.

This proceeding is closed.

1. Background

The California Public Utilities Commission (Commission) opened this rulemaking to consider proposed amendments to the Commission's General Order (GO) 133, in particular whether to apply GO 133, or similar standards to wireless voice service. In response to Petition 21-10-003, on March 17, 2022, the Commission adopted Order Instituting Rulemaking (R.) 22-03-016 to consider proposed amendments to the Commission's GO 133. GO 133 sets minimum service quality standards for telecommunications services and includes an enforcement mechanism. As part of R.22-03-016, the Commission considered revisions to GO 133-D, and in approving D.25-09-031, ultimately adopted GO 133-E.

D.25-09-031 revised service restoration requirements for plain old telephone service (POTS) and adopted new rules for fixed interconnected Voice over Internet Protocol (VoIP) service. Additionally, D.25-09-031 adopted new or

revised rules for several customer service standards for POTS and fixed interconnected VoIP service, including installation standard and customer service standard.

D.25-09-031 found that service restoration has declined for wireless voice services, as the number of outages increased over time, as has outage duration, to such a degree that consumers now experience outages of well over 24, 48, 72, and 96 hours.¹ This finding relied on two data sources, the FCC's Network Outage Reporting System (NORS)² metrics and the California Governor's Office of Emergency Services (Cal OES) outage data.³

This data trend led the Commission to find that "market forces, such as they exist, have not disciplined the service quality of... wireless carriers."⁴

In its analysis of the record, the Commission concluded that it was necessary to obtain more information to determine the appropriate enforcement

¹ D.25-09-031, at Finding of Fact 3.

² The FCC requires wireline, cable, satellite, wireless, and Signaling System 7 voice providers to report network outages to NORS. These providers also must submit this data concurrently to the Commission.

³ Title 19 California Code of Regulations, Division 2, Chapter 1.5 defines a community isolation outage is an outage that meets the below threshold criteria for each service type: TDM (wireline) voice service — for telecommunications service provided by facilities-based carriers, other than mobile telephony service or VoIP service, herein referred to as wireline, an outage that lasts at least 30 minutes and potentially affects (A) at least 100 end users in a single zip code, or (B) at least 50% of end users in a ZIP code with fewer than 100 end users.

- Voice over Internet Protocol (VoIP) service — for telecommunications service provided by VoIP or Internet Protocol enabled service, an outage that lasts at least 30 minutes and potentially affects (A) at least 100 end users in a single zip code, or (B) at least 50 percent of end users in a zip code with fewer than 100 end users.

- Wireless voice service — for telecommunications service provided by mobile telephony service, an outage that lasts at least 30 minutes and affects at least 25 percent of a carrier's coverage area in a single zip code.

⁴ D.25-09-031, at Finding of Fact 19.

process for wireless outages and customer service issues, prior to adopting new rules for wireless carriers. This effort includes obtaining more data from AT&T, T-Mobile, Verizon,⁵ and CTIA.^{6,7}

1.1. Findings in Decision 25-09-031

In adopting D.25-09-031, the Commission made numerous findings regarding wireless service, including the following:

- Service restoration has declined for wireless voice services, as the number of outages increased over time, as has outage duration, to such a degree that consumers now experience outages of well over 24, 48, 72 and 96 hours.⁸
- The number of wireless outages in excess of 96 hours increased from 31 in 2018 to 254 in 2021.⁹
- In 2021, wireless carriers reported to Cal OES 3,315 community isolation events.¹⁰ In 2022, wireless carriers reported 3,319 community isolation events. In 2023, wireless carriers reported 5,865 community isolation events.¹¹

⁵ Cellco Partnership dba Verizon Wireless.

⁶ CTIA is a trade association whose membership includes the following parties in this proceeding: AT&T Mobility, T-Mobile, and Verizon.

⁷ D.25-09-031, at 180, Finding of Fact 26.

⁸ *Id.*, at Finding of Fact 3.

⁹ *Id.*, at Finding of Fact 6.

¹⁰ As discussed in Section 4 of this decision, a community isolation outage limits an end user's ability to make 911 calls or receive emergency notifications. Cal OES requires carriers that offer access to 911 service to report on community isolation outages notifications via email to Cal OES. Wireless carriers are required to report community isolation outages that last longer than 30 minutes and affect at least 25 percent of a carrier's coverage area in a single ZIP Code.

¹¹ D.25-09-031, at Finding of Fact 9.

- Californians rely on their wireless devices to receive emergency notifications, contact family and friends, and reach first responders during emergencies.¹²
- Overall, the experiences of Californians, customers of the various carriers, corroborate the hard data and other information in the record.¹³
- With respect to wireless service, market forces, such as they exist, have not disciplined the service quality of wireless carriers.¹⁴
- Voice service customers of all telephone corporations should receive a functionally equivalent standard of service.¹⁵
- Wireless providers have identified deficiencies with relying on Cal OES community isolation outage data and NORS data but did not identify substitute data.¹⁶

Additionally, the Commission also made the following Conclusions of Law, among others:

- The Commission has jurisdiction over facilities-based wireless providers, and authority to ensure the reliability of communications networks.¹⁷
- The Federal Communications Act does not preempt the Commission from exercising public safety regulation of wireless facilities.¹⁸

¹² *Id.*, at Finding of Fact 10.

¹³ *Id.*, at Finding of Fact 15.

¹⁴ *Id.*, at Finding of Fact 19.

¹⁵ *Id.*, at Finding of Fact 24.

¹⁶ *Id.*, at Finding of Fact 26.

¹⁷ *Id.*, at Conclusion of Law 3.

¹⁸ *Id.*, at Conclusion of Law 15.

While CTIA, AT&T, T-Mobile, and Verizon have asserted the Commission did not make these findings and conclusions, or did so in error, the Commission rejected their application for rehearing.¹⁹ Thus, these findings and conclusions stand. They also are made in this decision, or, in some instances, are updated to reflect more recent data. For example, as noted in the Commission's Communications Division Staff Proposal (Staff Proposal), issued August 19, 2026, from 2023 through 2025, AT&T, T-Mobile, and Verizon reported to Cal OES more than 17,000 wireless community outages. In 2023, there were 5,902 outages. In 2024, there were 5,615 outages. In 2025, there were 5,956 outages.²⁰ Roughly half of the Cal OES outages during this time were four hours or less.²¹ One of the three wireless carriers was responsible for a majority of outages.²²

1.2. Procedural Background

The Commission opened this rulemaking on February 26, 2026.

A prehearing conference was held on April 8, 2026, to address the issues of law and fact, determine the need for hearing, set the schedule for resolving the matter, and address other items as necessary.

The Assigned Commissioner issued a Scoping Memo and Ruling on June 3, 2026.

On June 25, 2026, the first workshop in this proceeding was held.

On August 27, 2026, the second workshop in this proceeding was held.

¹⁹ See, D.26-07-033, which denied the application for rehearing of D.25-09-031 filed by USTelecom-the Broadband Association and Pacific Bell Telephone Company D/B/A AT&T California, AT&T Enterprises, LLC, and Teleport Communications America, LLC (collectively, the VoIP Providers) and the application for rehearing of the Decision filed by CTIA and T-Mobile West LLC (collectively, the Wireless Parties).

²⁰ Staff Proposal, at 19.

²¹ *Id.*, at 20.

²² Company specific Cal OES outages are confidential.

The Commission held remote public participation hearings on July 15, 2026, and July 23, 2026.

On August 19, 2026, the assigned Administrative Law Judge (ALJ) issued a proposal from the Commission's Communications Division (Staff Proposal).

On September 8, 2026, the Assigned Commissioner hosted a Tribal Consultation.²³

On September 8, 2026, the following parties filed and served Opening Comments on the Staff Proposal:

- Small Business Utility Advocates (SBUA);
- T-Mobile West LLC dba T-Mobile (U-3056-C) and affiliates (T-Mobile);
- Center for Accessible Technology (CforAT) and Rural County Representatives of California (RCRC), jointly;
- The Public Advocates Office at the California Public Utilities Commission (Cal Advocates);
- The Utility Reform Network (TURN);
- CTIA;²⁴
- AT&T Mobility LLC (New Cingular Wireless (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"); and
- Cellco Partnership dba Verizon Wireless (U 3001 C) (Verizon).

²³ The Assigner Commissioner's Scoping Memo indicated that the Tribal Consultation would occur prior to issuance of a proposed decision. On September 8, 2026, the assigned ALJ notified parties of the meeting. The Commission treats Tribal consultations as government-to-government meetings, meaning the meetings are not noticed on the Commission's Daily Calendar.

²⁴ CTIA — The Wireless Association (CTIA) is a trade association whose members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. Specific members include AT&T, T-Mobile, and Verizon.

On September 15, 2026, the following parties filed and served Reply Comments on the Staff Proposal:

- Verizon;
- RCRC;
- T-Mobile;
- Cal Advocates;
- CTIA;
- CforAT;
- TURN;
- SBUA; and
- AT&T.

1.3. Submission Date

This matter was submitted on September 15, 2026, upon the filing and serving of reply comments.

2. Jurisdiction

Pursuant to Public (Pub.) Utilities (Util.) Code²⁵ Section 2896(c), the Commission requires telephone corporations to provide customer service to telecommunication customers that includes, but is not limited to, reasonable statewide service quality standards, including, but not limited to, standards regarding network technical quality, customer service, installation, repair, and billing.

The Commission has jurisdiction over public utilities, including public utility services and facilities for telephone corporations.²⁶ Under Pub. Util. Code

²⁵ All subsequent references are to the Public Utilities Code unless otherwise specified.

²⁶ See, Cal. Const., Art. XII, Sections 1-6; Pub. Util. Code Section 701.

Section 216, a “public utility” includes every “telephone corporation”²⁷ where service is performed, or a commodity is delivered to the public or any portion thereof. The definition of a “telephone corporation” includes “every corporation or person owning, controlling, operating, or managing any telephone line for compensation in this state.”²⁸ A “telephone line” includes “all conduits, ducts, poles, wires, cables, instruments, and appliances, and all other real estate, fixtures, and personal property owned, or controlled, operated, or managed in connection with or to facilitate communication by telephone, whether such communication is had with or without the use of transmission wires.”²⁹

California’s Constitution specifically extends the Commission’s jurisdiction to companies engaged in “the transmission of telephone and telegraph messages.”³⁰ This includes services delivered over any technology, including but not limited to, traditional copper lines, coaxial cable, fiber optic cable, and mobile or fixed wireless radios.

The Commission’s authority over public utilities includes oversight over both public utility services and facilities.³¹ The Commission is required to ensure that utilities, including telephone corporations, “furnish and maintain such adequate, efficient, just and reasonable service, instrumentalities, equipment, and facilities ... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”³² The Commission also

²⁷ Pub. Util. Code Section 234.

²⁸ *Ibid.*

²⁹ Pub. Util. Code Section 233.

³⁰ Cal. Const., Art. XII, Section 3.

³¹ *See*, Cal. Const., Art. XII, Sections 1-6; Pub. Util. Code Section 701.

³² Pub. Util. Code Section 451.

has an ongoing responsibility to ensure the reasonableness and sufficiency of utility facilities³³ and may order “additions, extensions, repairs, or improvements to, or changes in” utility facilities that the Commission finds “ought reasonably to be made.”³⁴

Under California law, the means by which service is provided, whether it be traditional landline, wireless technology, or IP-enabled, does not affect whether the provider meets the definition of a public utility telephone corporation.

Wireless carriers are “telephone corporations” and therefore public utilities under Pub. Util. Code Sections 216, 233, and 234.

In 1993, Congress passed the Omnibus Budget Reconciliation Act of 1993 (Budget Act), which amended 47 United States Code (U.S.C.) Section 332(c)(3)(A) as follows:

...no State or local government shall have any authority to regulate the entries of or the rates charged by any commercial mobile service or any private mobile service, except this paragraph shall not prohibit a State from regulating the other terms and conditions of commercial mobile service.³⁵

On its face, 47 U.S.C. Section 332(c)(A)(3) preempts only state attempts to prevent new mobile service carriers from entering the market or to regulate rates

³³ *Id.*, at Section 761.

³⁴ *Id.*, at Section 762.

³⁵ Codified at 47 U.S.C. Section 332(c)(3)(A) (emphasis added). The Budget Act was part of a national redistribution of regulatory authority which continued with the 1996 Telecommunications Act and resulted in what has been referred to as a system of “cooperative federalism.” See, e.g., *Core Communications, Inc. v. Verizon Pennsylvania, Inc.* 493 F.3d 333, 335 (3d Cir. 2007) (“[T]he Act provides that various responsibilities are to be divided between the state and federal governments, making it ‘an exercise in what has been termed cooperative federalism.’ (Internal citation omitted) . . . The ‘intended effect’ of such regime was to ‘leave[e] state commissions free, where warranted, to reflect the policy choices made by their states’”).

charged for wireless services; any other state regulation of mobile services providers remain unaffected.³⁶ Whether a particular regulation falls under the meaning of “market entry,” “rates,” or “other terms and conditions” is fact-specific, requiring a case-by-case determination.³⁷ Although states may not regulate the entry of or rates charged by wireless providers, not all matters that may indirectly affect wireless providers’ rates constitute rate regulation contemplated by 47 U.S.C. Section 332. The scope of 47 U.S.C. Section 332’s preemptive language is limited to regulations that directly and explicitly control rates, prevent market entry, or require a determination of the reasonableness of rates.³⁸ The Commission still retains the clear authority to regulate “other terms and conditions of service.” Thus, pursuant to 47 U.S.C. Section 332(c)(3), states may regulate wireless service quality.

As we stated in D.21-10-015, D.20-07-011, and D.25-09-031, the legislative history of 47 U.S.C. Section 332(c)(3)(A) indicates what Congress meant by the language “other terms and conditions” (also referred to as the “savings clause”), and reemphasizes the role Congress saw for the States:

It is the intent of the Committee that the State still will be able to regulate the terms and conditions of... [CMRS]³⁹... services.

³⁶ *Centennial P.R. License Corp. v. Telecomms. Regulatory Bd.*, 634 F.3d 17 (1st Cir.), cert. denied 565 U.S. 826 132 S.Ct. 119, 181 Ed. 2d 42 (2011). See also Joint Consumers Response to App. for Rehearing at 7.

³⁷ *Telesaurus VPC, LLC v. Power* (9th Cir., 2010) 623 F.3d 998, 1007 (“the FCC rejected this per se approach, adopting instead a case-by-case analysis for preemption of state tort actions”); *Shroyer v. AT&T* (“the FCC rejected this per se [preemption] argument in *In re Wireless Consumers Alliance*, and so do we.”)

³⁸ *Spielholz v. Superior Court* (2001) 86 Cal. App. 4th 1366; *Fedor v. Cingular Wireless* (7th Cir. 2004) 355 F.3d 1069, 1074. (*Phillips*, 2004 U.S. Dist. LEXIS 14544 at *24-25; see also, *Brown v. Washington/Baltimore Cellular, Inc.* (D. Md. 2000) 109 F. Supp. 2d 421, 423; *Iowa v. US Cellular Corp.* (S.D. Iowa 2000) 2000 U.S. Dist. LEXIS 21656, *5 (*US Cellular*).)

³⁹ Commercial mobile radio service.

By “terms and conditions” the Committee intends to include such matters as customer billing information and packaging and billing disputes and other such consumer protection matters; facility siting issues (e.g. zoning); transfers of control; bundling of services and equipment; and the requirement that carriers make capacity available on a wholesale basis and such other matters as fall within the State’s lawful authority. This list is intended to be illustrative only and not meant to preclude other matters generally understood to fall under “terms and conditions.”⁴⁰

The FCC confirmed our jurisdiction over “other terms and conditions” when it stated that it anticipated the Commission would continue to conduct appropriate complaint proceedings and to monitor the structure, conduct, and performance of wireless providers.⁴¹

We have successfully exercised jurisdiction over “other terms and conditions” of wireless service.⁴² In *Pacific Bell Wireless (Cingular) v. CPUC*, the

⁴⁰ H.R. Report No. 103-111, 103d Con. 1st Sess. (1993), at 251, reprinted in 1993 U.S.C.A.N. 378, 588 (emphasis added).

⁴¹ The FCC stated that the “CPUC retains whatever authority it possesses under state law to monitor the structure, conduct, and performance of CMRS providers in that state.” See May 19, 1995 Report and Order *In re Petition of the People of the State of California ... to Retain Regulatory Authority over Intrastate Cellular Service Rates*, 10 FCC Record 7486. Moreover, the Federal Communications Act contains “savings clauses” (described by the Court in *Farina v. Nokia, infra*) and discussed further below, which are “fundamentally incompatible with complete field preemption; if Congress intended to preempt the entire field . . . there would be nothing . . . to ‘save,’ and the provision would be mere surplusage.” (*Farina v. Nokia Inc* (3d Cir. 2010) 625 F.3d 97, 117 (3d Cir. 2010) 121-22).

⁴² For example, we have reviewed merger agreements between wireless carriers pursuant to Public Utilities Code Sections 851-857 (T-Mobile/AT&T proposed merger, I.11-06-009; T-Mobile/Sprint proposed merger, A.18-07-011, A.18-07-012); enforced consumer protection measures against wireless carriers in the Consumer Protection Initiative Decision (D.06-08-030) and Cramming Reporting Decision (D.10-10-034), and applied outage reporting requirements to wireless carriers (D.16-08-021).

California Court of Appeal upheld the Commission's assertion of jurisdiction in a case relying on the "other terms and conditions" language of 47 U.S.C.

Section 332(c)(3)(A), where we penalized a wireless carrier for providing "unjust and unreasonable service."⁴³

Under Pub. Util. Code Section 2107, the Commission has authority to impose penalties for violations of its decisions, rules, or requirements of not less than \$500 nor more than \$100,000 per offence.⁴⁴ Under Pub. Util. Code Section 2108, every violation is a separate and distinct offence, with continuing violations calculated as a separate and distinct offence for each additional day the violation continues.⁴⁵

⁴³ We issued D.04-09-062, concluding an investigation into the sale of cellular telephone equipment and Early Termination Fee (ETF) practices of Cingular Wireless (Cingular). There, the CPUC determined that Cingular's ETF policy "constituted an unjust and unreasonable rule and resulted in inadequate, unjust, and unreasonable service in violation of both Pub. Util. Code Section 451" and a prior Commission decision, D.95-04-028 and ordered Cingular to pay customer reparations and a penalty. (D.04-12-058 at 1.) In 2006, the Court of Appeal upheld our assertion of jurisdiction over Cingular Wireless and denied Cingular's Petition for Writ of Review. (*Pacific Bell Wireless (Cingular) v. CPUC*, 140 CA4th 718 (2005). The California Supreme Court and U.S. Supreme Court summarily denied Cingular's ensuing petitions for review.

⁴⁴ Pub. Util. Code Section 2107 states:

Any public utility that violates or fails to comply with any provision of the Constitution of this state or of this part, or that fails or neglects to comply with any part or provision of any order, decision, decree, rule, direction, demand, or requirement of the commission, in a case in which a penalty has not otherwise been provided, is subject to a penalty of not less than five hundred dollars (\$500), nor more than one hundred thousand dollars (\$100,000) for each offense.

⁴⁵ Pub. Util. Code Section 2108 states:

Every violation of the provisions of this part or of any part of any order, decision, decree, rule, direction, demand, or requirement of the commission, by any corporation or person is a separate and distinct offense, and in case of a continuing violation each day's continuance thereof shall be a separate and distinct offense.

2.1. Positions of Parties

Parties disagree over the Commission's jurisdiction, with industry parties recycling legal and factual arguments that the Commission has previously rejected and in which they have already lost on rehearing and appeal, and parties representing consumers noting that fact.

2.1.1. Industry Assertion of Preemption under 47 U.S.C. Section 332(c)(3)(A)

AT&T, Verizon⁴⁶ and CTIA claim the proposed rules are preempted by the prohibition in 47 U.S.C. Section 332(c)(3)(A) against states regulating the rates for wireless service, as well as market entry.^{47,48} CTIA offers the most extensive explanation of this position:

Federal law preempts a state from regulating the way wireless providers design, construct, operate, and/or deploy their wireless network infrastructure — infrastructure that utilizes radiofrequency spectrum exclusively licensed by the FCC — including by prescribing the quality of wireless service or mandating wireless network performance levels. Yet the staff's proposed outage repair standard and network availability standard — as well as the related enforcement mechanisms (including penalties) — do exactly that in violation of Section 332(c)(3)(A) of the federal Communications Act.

⁴⁶ See, Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 31. Verizon states that it "joins in" CTIA's comments.

⁴⁷ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 26-27. CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 38-40.

⁴⁸ 47 U.S.C. Section 332(c)(3) (A) reads, in part:

Notwithstanding sections 152(b) and 221(b) of this title, no State or local government shall have any authority to regulate the entry of or the rates charged by any commercial mobile service or any private mobile service, except that this paragraph shall not prohibit a State from regulating the other terms and conditions of commercial mobile services.

Section 332(c)(3)(A) expressly and broadly preempts state regulation of “the entry of or the rates charged by any commercial mobile service.” Any decision by the Commission attempting to apply service quality mandates (such as outage repair requirements and/or network availability requirements) to wireless providers therefore would be preempted under Section 332(c)(3)(A).

Courts have interpreted Section 332(c)(3) as preempting states from determining whether a wireless provider’s “service is above or below the proper standard for cell phone service” or whether a wireless provider’s network facilities are adequate.⁴⁹ Accordingly, courts (including courts in California) and the FCC have recognized that state inquiries into “the level of cell phone service” that a consumer has received, or whether a wireless provider has “the infrastructure necessary to provide” a given level of service, inherently “relate to entry of or rates charged by a [wireless] provider” and are preempted by Section 332(c)(3)(A).⁵⁰ Network service quality requirements — including the staff’s proposals to prohibit and penalize community isolation outages exceeding 24 hours and to require wireless providers to meet a “network availability” standard set by the

⁴⁹ CTIA cites *Shroyer v. New Cingular Wireless Servs., Inc.*, 622 F.3d 1035, 1039-40 (9th Cir. 2010) (internal citations omitted); *id.* at 1040-41, 1044 (explaining that “[t]he plaintiff in *Bastien* was asking the court to decide the requisite number of cellular towers needed to support service” and that the claim — which was preempted by Section 332(c)(3)(A) — focused on whether “New Cingular’s service is above or below the proper standard for cell phone service”) (discussing *Bastien v. AT&T Wireless Servs.*, 205 F.3d 983 (7th Cir. 2000) (“*Bastien*”).

⁵⁰ CTIA cites *Apple iPhone 3G Prods. Liab. Litig.*, 728 F. Supp. 2d 1065, 1074 (N.D. Cal. 2010) (following *Bastien*); see also *McKinney v. Google, Inc.*, 2010 WL 11489027, at *8-9 (N.D. Cal. Nov. 16, 2010); *Wireless Consumers Alliance, Inc.*, 15 FCC Rcd 17021, 17036-37, ¶ 28 & nn.90, 91 (2000); *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, 33 FCC Rcd 9088, 9103 n.84 (2018) (“*Small Cells Order*”), *pets. for review denied in part and granted in part sub nom. City of Portland v. United States*, 969 F.3d 1020, 1032 (9th Cir. 2020). Courts also recognize that “a complaint that service quality is poor is really an attack on the rates charged” and therefore is preempted. *Bastien*, 205 F.3d at 988 (citing *Am. Tel. & Tel. Co. v. Cent. Off. Tel., Inc.*, 524 U.S. 214, 223 (1998) (“[A]ny claim for excessive rates can be couched as a claim for inadequate services and vice versa.”)); see also *McKinney*, 2010 WL 11489027, at *8.

Commission or face penalties — run headlong into Section 332(c)(3)(A)’s express prohibitions.

Such requirements dictate wireless providers’ network design and therefore would regulate both market entry and rates in violation of Section 332(c)(3)(A). In particular, any rules that prohibit and/or penalize wireless network outages or failures to meet a 99% (or any other) network availability standard would directly affect how wireless providers design, construct, and operate their wireless networks using FCC-licensed spectrum.⁵¹

CTIA adds that:

Preemption equally applies to outage prohibitions, repair standards, and network availability standards (such as the proposed PUMA-based “network availability” standard of 99% (see Staff Proposal at 40-42)), as all such proposals effectively require substantially uninterrupted service for a specified period of time. For the same reasons, preemption applies to mechanisms (including penalties and corrective action plans) to enforce those substantive requirements. To be clear, these rules would be preempted under Section 332(c)(3)(A) — as well as other preemption grounds discussed below — even if the Commission applied the exemptions applicable to POTS and VoIP providers under G.O. 133-E (such as a Governor-declared “state of emergency ... related to disasters or electric grid outages,” see *id.*, § 2.3(c)); if the Commission did not apply those exemptions, the burdens imposed by the proposed rules would be even more significant and legally indefensible.⁵²

CTIA also claims that:

The Commission’s proposal to require wireless carriers to “submit a corrective action plan for repeated noncompliance of service quality standards in a specific geographic area” further underscores that the proposed rules would

⁵¹ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 38-39.

⁵² *Id.*, at footnote 121.

impermissibly dictate network design and operations in direct contravention of Section 332(c)(3)(A).

Finally, while states are permitted to regulate the “other terms and conditions” of commercial mobile services, that narrow exception is inapplicable here.⁵³

2.1.2. Industry Assertion of Field Preemption

CTIA claims the proposed outage repair and network availability standards, as well as the proposed mapping requirement, and all enforcement mechanisms related to those three proposals, would be subject to “field preemption” because CTIA alleges “they (the proposed rules) intrude into areas of exclusive federal regulation relating to wireless spectrum use and network operation.”⁵⁴

CTIA further opines that:

The FCC has long exercised exclusive authority over technical matters relating to radiofrequency spectrum and wireless network construction and operations, including spectrum licensing, network deployment requirements, service obligations, and other technical aspects of wireless communications systems.⁵⁵ For instance, a non-exhaustive list of the FCC’s exclusive regulatory authority includes “[p]rescrib[ing] the nature of the service[s] to be rendered” by the licensees; “determin[ing] the power” level that each licensee “shall use” and “the time during which it may

⁵³ *Id.*, at 39-40.

⁵⁴ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 40. *See*, Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 31. Verizon states that it “joins in” CTIA’s comments.

⁵⁵ CTIA cites *N.Y. SMSA Ltd. P’ship v. Town of Clarkstown*, 612 F.3d 97, 105 (2d Cir. 2010) (citing *Freeman v. Burlington Broadcasters*, 204 F.3d 311 (2d Cir. 2000)); *Sw. Bell Wireless, Inc. v. Johnson Cnty. Bd. of Cnty. Comm’rs*, 199 F.3d 1185, 1193 (10th Cir. 1999); *Head v. N.M. Bd. of Examiners in Optometry*, 374 U.S. 424, 430 n.6 (1963).

operate”; “establish[ing]” the “areas or zones to be served”; and “regulat[ing] the kind of apparatus to be used.”^{56,57}

CTIA declares that given what it characterizes as a “pervasive federal regulatory framework” governing wireless communications, “any state-imposed network service quality requirements (including the proposed outage repair and network availability standards here) would be field-preempted because they would regulate the technical performance of wireless networks — an area reserved exclusively to the FCC.” CTIA also argues that the proposed outage rules would dictate how wireless providers design, construct, and operate their networks in order to achieve prescribed performance outcomes, thereby imposing technical obligations on providers’ radiofrequency networks and

⁵⁶ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 40-41.

⁵⁷ At footnote 126, CTIA states:

47 U.S.C. §§ 303(b), 303(c), 303(e), and 303(h). The FCC has exercised its exclusive jurisdiction over wireless services in exhaustive fashion through comprehensive regulations. *See, e.g., Bastien*, 205 F.3d at 988. These detailed regulations address such technical matters as: (i) service areas to be covered and construction requirements (47 C.F.R. §§ 22.911, 24.203, 27.14); (ii) signal strength requirements (*id.*, §§ 22.911, 24.236, 27.55); (iii) maximum power and antenna height limits for operating cellular and fixed transmitters (*id.*, §§ 22.913, 24.232, 27.50); (iv) maximum emissions limits (*id.*, §§ 24.238, 27.53); (v) signal interference restrictions (*id.*, §§ 22.970-22.972, 27.57); (vi) mandates to discontinue service in certain situations (*id.*, §§ 22.352, 27.64); (vii) mandates to transmit 911 calls, which the FCC has applied to penalize a subset of network outages based on unreasonable action by the service provider (*id.*, §§ 9.4, 9.10(b); *Lumen Techs., Inc.*, 38 FCC Rcd 9750, 9752, 9762, 9764, ¶¶ 6, 38, 41 (2023)); and (viii) obligations to report certain wireless network facilities outages to the FCC (47 C.F.R. § 4.9(e)).

regulate matters committed exclusively to the FCC, which retains “exclusive authority over technical matters” relating to use of radiofrequency spectrum.^{58,59}

In a similar manner, CTIA contends that the Staff’s Proposal mapping requirement, discussed in Section 7 of this decision, would be subject to field preemption given the FCC’s comprehensive regulation in this area — including specifying, based on a balancing of relevant considerations, the types of maps that wireless providers should make available to the public.⁶⁰

2.1.3. Industry Assertion of Conflict Preemption

CTIA also asserts that the proposed rules are subject to conflict preemption due to what it calls “an explicit policy decision by the FCC, pursuant to its exclusive Title III authority, not to regulate wireless network service quality.”⁶¹ CTIA expresses this opinion about the proposed network availability and outage standards, as well as the proposed mapping requirement.⁶²

2.1.4. Response of Consumer Parties to Industry Assertions

Parties representing consumers disagree with the arguments made by industry parties.

⁵⁸ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 41.

⁵⁹ CTIA cites *Clarkstown*, 612 F.3d at 105 (citation and internal quotations omitted), and *Small Cells Order*, 33 FCC Rcd at 9103 n.84.

⁶⁰ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 42.

⁶¹ *Ibid.*

⁶² *Id.*, at 42-44.

CforAT and Cal Advocates both note that the Commission has previously made clear that these arguments are misstatements of law and that the Commission should continue to reject these arguments.⁶³

In response to industry arguments that 47 U.S.C. Section 332(c)(3)(A) preempts this Commission, TURN asserts that even if one reads in isolation the sentence that “no state or local government shall have any authority to regulate the entry of or the rates charged by any commercial mobile service or any private mobile service...” industry parties still are incorrect because nothing in the Staff Proposal amounts to a barrier to entry nor a dictation on rates carriers must charge.⁶⁴ Cal Advocates agrees, asserting that regulating network design is not regulating market entry nor regulating rates.⁶⁵

TURN and Cal Advocates raise the next sentence in the statute, which states:

Nothing in this subparagraph shall exempt providers of commercial mobile services (where such services are a substitute for land line telephone exchange service for a substantial portion of the communications within such State) from requirements imposed by a State commission on all providers of telecommunications services necessary to ensure the universal availability of telecommunications service at affordable rates.⁶⁶

TURN argues that since the service quality metrics in the Staff Proposal have an analogue found in already existing regulations of wireline voice services,

⁶³ CforAT, Reply Comments on Staff Proposal, filed September 15, 2026, at 2. Cal Advocates, Reply Comments on Staff Proposal, filed September 15, 2026, at 30-31.

⁶⁴ TURN, Reply Comments on Staff Proposal, filed September 15, 2026, at 39.

⁶⁵ Cal Advocates, Reply Comments on Staff Proposal, filed September 15, 2026, at 31.

⁶⁶ TURN, Reply Comments on Staff Proposal, filed September 15, 2026, at 39. Cal Advocates, Reply Comments on Staff Proposal, filed September 15, 2026, at 31.

and this Commission is responsible for ensuring that essential communications services, including wireless, are safe and reliable for all residents of California, this exception to 47 U.S.C. Section 332(c)(3)(A) is met, and federal preemption does not apply in this instance.⁶⁷

Cal Advocates also contends that California's police power includes the authority to protect the health and safety of its citizens, and this power is "unquestionably an area of traditional State control" given that the California Constitution and California statutory law designates this Commission as "the principal body through which the State exercises its police power in the case of essential utility network services."⁶⁸

Regarding conflict preemption, TURN asserts that no provider has alleged what specific FCC objective the new wireless service quality rules would impinge, or how they would negate the FCC's authority, and in fact there are no FCC orders that preempt service quality rules for wireless service, fixed, or otherwise.⁶⁹

2.2. Discussion

CTIA, AT&T, T-Mobile, and Verizon have made the same arguments in this proceeding – that the Commission is preempted from adopting or otherwise prohibited from adopting by statute or caselaw – in nearly every proceeding where the Commission has attempted to adopt and implement

⁶⁷ TURN, Reply Comments on Staff Proposal, filed September 15, 2026, at 39.

⁶⁸ Cal Advocates, Reply Comments on Staff Proposal, filed September 15, 2026, at 31. Cal Advocates cites to D.21-10-015 at 7.

⁶⁹ TURN, Reply Comments on Staff Proposal, filed September 15, 2026, at 42-44. TURN cites to Order Granting Motion to Dismiss at 10-11m, *USTelecom – The Broadband Ass'n v. Alice Busching Reynolds, et al.*, 2026 U.S. Dist. LEXIS 38104 (No. 25-cv-08959-LB) (N.D. Cal. 2026).

consumer protection measures for wireless service.⁷⁰ As in every other case, the arguments regarding preemption are without merit. The Commission dismissed these claims in D.21-10-015, when it denied an application for rehearing of D.20-07-011, which adopted the Commission's wireless resiliency rules, including the requirement carriers in Tier 2 and 3 High Fire Threat Districts (HFTDs) are required to provide 72 hours of backup power even when there is no declared state of emergency. The Commission also dismissed these claims in D.25-09-031.

To begin, industry parties are incorrect in stating that the Commission's proposed rules would regulate infrastructure, such as spectrum. The proposed rules focus on the service that is provided to the customers, not how the carriers provide it. While the industry parties have asserted that the service quality rules proposed here necessarily dictate the manner in which they design and operate their networks, requiring a particular outcome is not the same thing as regulating the means by which the carriers must reach it.

CTIA's analysis ignores the many cases that recognize that consumer protection interests are reserved to the States pursuant to 47 U.S.C. Section 332(c)(3)(A).⁷¹ The Commission has successfully exercised jurisdiction

⁷⁰ See, e.g., I.11-06-009 (T-Mobile/AT&T proposed merger); A.18-07-011, A.18-07-012 (T-Mobile/Sprint proposed merger); D.04-09-062, D.04-12-058, *Pacific Bell Wireless (Cingular) v. CPUC*, 140 CA4th 718 (2005) (jurisdiction over AT&T Wireless' corporate predecessor, Cingular); D.12-02-032 (jurisdiction over a mobile reseller, TracFone); D.10-10-034 (Cramming Reporting Decision); D.20-09-012, Modifying and Denying Rehearing of D.19-08-025 (adopting an emergency disaster relief program for customers of communications service providers in this proceeding, R.18-03-011).

⁷¹ See, e.g., *Ting v. AT&T Corp.* (9th Cir. 2003) 319 F.3d 1126, *cert. denied*, *AT&T Corp. v. Ting* (2003) 124 S.Ct. 53.; *Spielholz v. Superior Court* (2001) 86 Cal.App.4th 1366; *Fedor v. Cingular Wireless* (7th Cir. 2004) 35 F.3d 1069; *Phillips v. AT&T Wireless* (S.D. Iowa July 29, 2004) 2004 U.S. Dist. LEXIS 14544; *Brown v. Washington/Baltimore Cellular, Inc.* (D. Md. 2004).

Footnote continued on next page.

over “other terms and conditions” of wireless service.⁷² CTIA, AT&T, T-Mobile, and Verizon also disregard *Pacific Bell Wireless (Cingular) v. CPUC*. In *Cingular*, the California Court of Appeal upheld the Commission’s exercise of jurisdiction in a case relying on the “other terms and conditions” language of 47 U.S.C. Section 332(c)(3)(A), where we penalized a wireless carrier for providing “unjust and unreasonable service.”⁷³ CTIA, AT&T, T-Mobile, and Verizon ignore the clear legislative intent of what falls under the rubric of “other terms and conditions” and decades of caselaw supporting this legislative intent. Instead, by relying on the *Bastien* case, CTIA, AT&T, T-Mobile, and Verizon erroneously contend that our interpretation of 47 U.S.C. Section 332(c)(3)(A) is too narrow.

2000) 109 F. Supp. 2d 421, 423; *Iowa v. US Cellular Corp.* (S.D. Iowa 2000) 2000 U.S. Dist. LEXIS 21656; *Communications Telesystems Int’l v. Calif. Pub. Util. Comm’n* (9th Cir. 1999) 196 F.3d 1011.

⁷² For example, we have reviewed merger agreements between wireless carriers pursuant to Pub. Util. Code Sections 851-857 (T-Mobile/ AT&T proposed merger, I.11-06-009; T-Mobile/Sprint proposed merger, A.18-07-011, A.18-07-012); enforced consumer protection measures against wireless carriers in the Consumer Protection Initiative Decision (D.06-08-030) and Cramming Reporting Decision (D.10-10-034), and applied outage reporting requirements to wireless carriers (D.16-08-021).

⁷³ We issued D.04-09-062, concluding an investigation into the sale of cellular telephone equipment and Early Termination Fee (ETF) practices of Cingular Wireless (Cingular). There, the Commission determined that Cingular’s ETF policy “constituted an unjust and unreasonable rule and resulted in inadequate, unjust, and unreasonable service in violation of both Pub. Util. Code Section 451” and a prior Commission decision, D.95-04-028 and ordered Cingular to pay customer reparations and a penalty. (D.04-12-058 at 1.) In 2006, the Court of Appeal upheld our assertion of jurisdiction over Cingular Wireless and denied Cingular’s Petition for Writ of Review. (*Pacific Bell Wireless (Cingular) v. CPUC*, 140 CA4th 718 (2005). The California Supreme Court and U.S. Supreme Court summarily denied Cingular’s ensuing petitions for review.

In *Bastien*, the plaintiff filed a lawsuit challenging AT&T's rates and an FCC-mandated radio tower build-out plan.⁷⁴ The Seventh Circuit rejected plaintiff's consumer class action because the plaintiff explicitly requested that AT&T build out more cell towers, which conflicted with a specific FCC market buildout plan for that area.⁷⁵ Furthermore, while the Seventh Circuit stated in *Bastien* that states are preempted from regulating rates and market entry for wireless service, the Court also found that "the savings clause continues to allow claims that do not touch upon the areas of rates and market entry."⁷⁶ Indeed, the rules we adopt here, General Order 133-F, impose no market-entry condition. The rules establish post-entry standards measuring whether a provider timely installs and restores functioning wireless service and responds to customers receiving that service.

The rules adopted in this decision also are not preempted on the grounds that they conflict with federal policy.⁷⁷ The FCC's presence in regulation alone does not imply conflict.⁷⁸ Further, the fact that the FCC has not adopted rules does not create a conflict. Moreover, conflict preemption analysis must be conducted on a case-by-case basis and is dependent on the specific facts of the

⁷⁴ *Bastien*, 205 F.3d at 989.

⁷⁵ *Ibid.*

⁷⁶ *Id.*, at 987. *See also*, Joint Consumers Response to Application for Rehearing at 8.

⁷⁷ With regard to field or conflict preemption, there remains "a strong presumption against preemption when the federal government regulates in areas traditionally left to the states." (*Pinney v. Nokia, Inc.* (4th Cir. 2005), 402 F3d 430, 457).

⁷⁸ *USTelecom – The Broadband Association v. Alice Busching Reynolds, et. al.*, US District Court for Northern California, Case No. 25-cv-08959-LB, Order Granting Motion to Dismiss. Here, the Court dismissed the Motion of USTelecom because it did not identify a specific FCC rule conflicting with the Commission's service quality rules for VoIP service.

case.⁷⁹ CTIA did not perform a fact-specific analysis of their conflict preemption claims.

The Commission dismisses all preemption claims. We address non-jurisdictional legal arguments in other sections of this decision.

3. Issues Before the Commission

The Assigned Commissioner's Scoping Memo determined that this proceeding will consider the following issues:

1. Should the Commission apply the service quality requirements in General Order 133-E to wireless voice services?
2. Should the Commission modify any of the existing service quality metrics, standards and reporting requirements applicable to wireless voice services? Are there reporting requirements or metrics that the Commission should not mandate?
3. Should the Commission apply the GO 133-E customer service metrics and standards to wireless voice, or develop new customer service standards and reporting requirements? Are there reporting requirements or metrics that the Commission should not mandate?
4. Are there impacts on environmental and social justice communities, including the extent to which wireless outages and other service quality challenges impact the achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan?
5. Are there impacts on Tribal communities, including the extent to which wireless outages and other service quality challenges specifically impact Tribal governments, Tribal communities, and Tribal businesses?⁸⁰

⁷⁹ *Telesaurus VPC, LLC v. Power* (9th Cir., 2010) 623 F.3d 998, 1007.

⁸⁰ Scoping Memo, at 2.

4. Community Isolation Service Standard

Cal OES requires carriers that offer access to 911 service to submit electronically community isolation outages notifications via email to Cal OES.⁸¹ A community isolation outage limits the end user's ability to make 911 calls or receive emergency notifications.⁸² By law, wireless carriers are required to notify Cal OES of community isolation outages that last at least 30 minutes and affect at least 25 percent of a carrier's coverage area in a single ZIP Code.⁸³

From 2023 through 2025, there were more than 17,000 wireless community outages reported to Cal OES, with annual outage totals between 5,600 and 6,000 occurrences.⁸⁴ In 2023, 576 outages exceeded 24 hours. In 2024, 401 outages exceeded 24 hours. In 2025, 372 outages exceeded 24 hours.

General Order 133-E requires that POTS and fixed interconnected VoIP service providers restore outages within 24 hours.⁸⁵ For consistency, the Staff Proposal recommends the Commission applies this standard to wireless voice service. Instead of using customer trouble tickets to track outages,⁸⁶ the Staff

⁸¹ California Government Code Section 53122

⁸² Cal. Code Regs. Title 19, Section 2480.2 – Community Isolation Outage Reporting Thresholds

⁸³ Ibid.

⁸⁴ Staff Proposal, at 19.

⁸⁵ GO 133-E, at 7-8. GO 133-E requires telephone corporations to restore outage tickets within 24 hours. The outage duration is expressed in hours and minutes, between the time a customer reports loss of service and when service is restored. GO 133-E allows nine different exemptions.

⁸⁶ See, T-Mobile, Response to July 10, 2026 Ruling, filed July 27, 2026, at 14:

In brief, T-Mobile does not generate “outage tickets” or otherwise manage its repair processes based on outages, but on detected network element issues. 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.

Proposal recommends using community isolation outages at the service restoration data point, with all community isolation outages being restored within 24 hours.⁸⁷

Under the Staff Proposal, carriers would be required to submit quarterly reports to the Commission at the end of each calendar quarter. Consistent with the wireless community isolation outage data the carriers already provide to Cal OES, these reports would need to include the following metadata fields: incident identification (ID), carrier name, year, month, date, outage start time, actual outage restoral time, outage duration in minutes, outage duration in hours, county, city, zip code, and outage cause.⁸⁸

The Staff Proposal recommends the Commission assess penalties on carriers for outages in excess of 24 hours and for not submitting accurate reports in a timely manner.

The proposed penalty for not restoring service after 24 hours is \$5,000 per outage occurrence (identified by incident ID) per day, multiplied by up to four times based on the outage duration. For example, an outage occurrence that lasts six days would be assessed a penalty for this single outage occurrence is as follows: \$5,000 (first day of noncompliance) plus \$10,000 (second day of noncompliance) plus \$15,000 (third day of noncompliance) plus \$20,000 (fourth day of noncompliance) plus \$20,000 (fifth day of noncompliance), for a total fine of \$70,000.⁸⁹ Staff analyzed the Cal OES outage data, and assert that this penalty structure would sanction less than 10 percent of wireless outages in California

⁸⁷ Staff Proposal, at 38.

⁸⁸ *Id.*, at 39. Staff ask the Commission to delegate to Staff the authority to specify the reporting template, file format, submission method, and filing deadline.

⁸⁹ *Ibid.*

and, using data for 2025, would result in \$17,310,000 split among the three carriers.⁹⁰

Staff also propose that the Commission sanction carriers submitting erroneous data, incomplete data, and late reporting, with a penalty of at least \$500 for each offence.⁹¹

4.1. Positions of Parties

Parties disagree on whether the Commission should adopt the proposed rules, with industry parties opposing adoption and parties representing consumers and local government supporting adoption. Several parties propose revisions.

AT&T, T-Mobile, Verizon and CTIA argue that the number of wireless outages in excess of 24 hours is limited and does not warrant regulatory intervention in the form of an outage repair mandate.⁹² T-Mobile and Verizon further claim that the Staff Proposal is inaccurate because it treats all outages as the same, despite the fact that T-Mobile and Verizon often include more than one ZIP Code in any given report, even if the same outage impacts many ZIP Codes. T-Mobile opines that when Cal OES outages are counted by ZIP Code instead of

⁹⁰ *Id.*, at 39-40. In 2025, there were 372 community isolation outages exceeding 24 hours in duration. Of the 372 outages, 222 lasted over 24 hours but less than 48 hours, incurring a fine amount of \$1,110,000. 44 outages lasted over 48 hours but less than 72 hours, incurring a fine amount of \$660,000. 106 outages lasted longer than 72 hours, incurring a fine amount of \$15,540,000. Of those 106 outages, 17 outages exceeded one week, 19 outages exceeded two weeks, and nine outages exceeded three weeks in duration.

⁹¹ *Id.*, at 39.

⁹² T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 13. CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 29. Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 15. AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 23-24.

by the number of reports, the trend over the past three years is clearly downward.⁹³ CTIA also maintains that outages have decreased.⁹⁴

AT&T states that its reported Cal OES outages are decreasing, as are average outage durations.⁹⁵ T-Mobile further contends that the Cal OES data provided by the carriers confirms that the aggregated uptime rate for wireless providers is approximately 99.8 percent overall and therefore outages account for only 0.20 percent of the potential network uptime.⁹⁶ T-Mobile states that almost all of the ZIP Codes in its service territory experienced a network uptime of 99 percent.⁹⁷

Moreover, T-Mobile and AT&T argue that a Cal OES outage is not necessarily an indication that customers are left without access to 911 service.⁹⁸ From a definitional standard, T-Mobile notes that a Cal OES outage is one that limits access to 911 service, not one that eliminates access.⁹⁹ From a more

⁹³ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 14. Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 14.

T-Mobile does not explain its calculation and instead makes the following citation at footnote 43: “CTIA’s Second Motion to Submit Aggregated Data at Attachment B (average aggregated impacted ZIP Codes per year from Cal OES data).”

⁹⁴ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 10-12.

⁹⁵ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 27-29.

⁹⁶ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 14-15. T-Mobile does not explain its calculation and instead cites to CTIA’s Second Motion to Submit Aggregated Data at Attachment A).

⁹⁷ *Id.*, at 14

⁹⁸ *Id.*, at 13. T-Mobile cites 19 CCR § 2480.2 (a): “A community isolation outage that limits a telecommunications service provider’s end users’ ability to make 911 calls or receive emergency notifications shall be deemed to exist, and must be reported to the office, when any of the following conditions exist...” AT&T Opening Comments on Staff Proposal, filed September 8, 2026, at 13. AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 33-34.

⁹⁹ *Ibid.*

practical standpoint, T-Mobile states that the FCC's "Must Carry" rules mean that if T-Mobile's network is down, AT&T or Verizon will carry the call.¹⁰⁰

Because of that, T-Mobile contends that Cal OES Reports do not provide any meaningful information about access to 911 service.¹⁰¹ Verizon states that the comments the Staff Proposal cites are indications of a lack of coverage, not of a service outage.¹⁰²

T-Mobile also opines that "the Staff Proposal's insinuation that there are numerous communities with only one carrier available is unsupported and contrary to all record evidence. Wireless service covers virtually all 'pops' throughout the state."¹⁰³

AT&T recommends standardized outage reporting before adopting an enforceable standard and asks the Commission to delay the enforcement portion of the rules for two or three years to allow for the reporting standardization.¹⁰⁴

AT&T, T-Mobile, and Verizon all ask the Commission to apply the exemptions already in GO 133-E to wireless service, asserting that many outages are outside the carrier's control.¹⁰⁵ Verizon asserts that without exemptions, the proposed standard is impossible to meet, adding that in ZIP Codes in which Verizon had four or more Cal OES outages exceeding 24 hours in 2023 through

¹⁰⁰ 47 C.F.R. § 9.10.

¹⁰¹ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 13. AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 33-34.

¹⁰² Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 14.

¹⁰³ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 13.

¹⁰⁴ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 50-54.

¹⁰⁵ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 16. AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 34-37. Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 15-17.

2025, none of these lengthy outage incidents could have been restored within 24 hours due to issues such as backhaul and restricted access.¹⁰⁶ TURN, RCRC and CforAT agree with industry and recommend the Commission align any outage related exemptions with the requirements for facilities-based providers in current General Order 133-E, including existing Commission decisions regarding emergency preparedness and backup power requirements.¹⁰⁷

SBUA supports the proposed 24-hour restoration standard for community isolation outages, asserting that it appropriately accounts for the reality that some areas are more difficult for carriers to reach than others.¹⁰⁸ RCRC and CforAT support the proposal to require wireless carriers to restore wireless community isolation outages within 24 hours, asserting that while outages are an issue throughout the state, it is particularly important in rural areas where residents may have access to only one facilities-based carrier or limited functional communications alternatives, where outages may limit access to emergency alerts, evacuation information, 911 access and emergency services altogether.¹⁰⁹ Cal Advocates supports adopting the proposed outage standards, noting that roughly 7.7 percent of Cal OES outages from 2023-2025, 1,349 outages exceeded 24 hours. TURN asserts that the Commission has a statutory obligation under Pub. Util. Code Section 2896(c) to ensure reliable telecommunications service, including wireless¹¹⁰ and argues the 24-hour restoration requirement is

¹⁰⁶ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 15-16.

¹⁰⁷ CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 7. TURN, Opening Comments on Staff Proposal, filed September 8, 2026, at 5-6.

¹⁰⁸ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 4.

¹⁰⁹ RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 4.

¹¹⁰ TURN, Opening Comments on Staff Proposal, filed September 8, 2026, at 1-2.

reasonable given carriers' existing wireless resiliency obligations (72-hour backup power, emergency operations plans) in Tier 2 and Tier 3 High Fire Threat Districts under D.20-07-011, and in light of the data.¹¹¹

SBUA, RCRC and CforAT support penalizing wireless carriers for noncompliance with the proposed rules but recommend the Commission also include a customer credit, asserting that a General Fund fine does not compensate customers for the direct impact of carrier noncompliance on these customers.¹¹²

In addition to the proposed required metadata that carriers must include in reports, SBUA recommends two more fields: an ESJ designation and the number or proportion of affected business accounts.¹¹³ SBUA also asks the Commission to require a "low-friction way" for an affected business to self-report the impact of a given outage.¹¹⁴ RCRC and CforAT also encourage the Commission to develop a public-facing tool that displays historical outage trends, not just current or recent outages.¹¹⁵

4.2. Discussion

The Commission does not adopt the proposed performance penalty at this time but instead will adopt a reporting requirement. As discussed more in Section 6 of this decision, the reporting requirement will combine both Cal OES outages and network availability statistics.

¹¹¹ *Id.*, at 4.

¹¹² SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 3. RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 7. Cal Advocates, Opening Comments on Staff Proposal, filed September 8, 2026, at 2.

¹¹³ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 4-5.

¹¹⁴ *Id.*, at 5.

¹¹⁵ RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 4.

Regarding CTIA's opinion on competition, the Commission previously found that market forces, such as they exist, have not disciplined the service quality of wireless carriers.¹¹⁶ As it relates to outages, the record in this proceeding illustrates the Commission's previous finding that outages are a significant service quality problem for California consumers. Outages remain high, with one of the three wireless carriers consistently reporting higher Cal OES outages than the other two.¹¹⁷

5. Network Availability by Public Use Microdata Area Standard

During the June 25 Workshop, carriers highlighted their performance measured using the network uptime metric¹¹⁸ while parties representing consumers and county supervisors provided a more granular perspective. Staff proposes measuring network availability by U.S. Census Public Use Microdata Area (PUMA).¹¹⁹ Staff asserts that utilizing PUMAs to evaluate wireless network availability and outage patterns directly addresses many of the reporting issues raised by parties, including SBUA stressing the need for disaggregated, timely service quality data to reveal disparities affecting emergency communication, Cal Advocates' recommendation to improve customer access to outage information and how wireless networks are functioning reliably throughout each

¹¹⁶ D.25-09-031, at Finding of Fact 19.

¹¹⁷ Cal OES outages are filed confidentially, consistent with statute.

¹¹⁸ It is not clear whether the geographic span used by carriers to measure this metric is statewide or nationwide.

¹¹⁹ PUMAs are non-overlapping standardized census areas designed for demographic analysis and contain no fewer than 100,000 residents each. PUMAs are used to tabulate and disseminate decennial census and American Community Survey (ACS) and Public Use Microdata Sample (PUMS) data. California currently contains 281 PUMAs based on decennial 2020 data with an average population of 140,705.

carrier's service territory, and CforAT's emphasis on the need for more granular wireless coverage data, explaining that high-level averages hide repeated outages for the same communities.¹²⁰

The Staff Proposal discusses that, unlike other geographic spans, such as statewide or ZIP Code, PUMA-based analysis has the capability to enhance the Commission's ability to assess service reliability, improve public safety, support ESJ communities, and design effective regulatory measures.¹²¹

To provide a more localized depiction of wireless network availability, Staff proposes the Commission adopt a network availability standard of 99 percent by day, by PUMA, where wireless carriers provide cellular service.¹²² Carriers would be required to submit quarterly reports to the Commission at the end of each calendar quarter.¹²³ Each quarterly report would include the network availability percentage for each PUMA for each day in the quarter, and the average network availability percentage for each PUMA by week, by month, and by quarter.¹²⁴ The Staff Proposal discusses how this reporting structure would give the Commission daily data to identify localized service failures while also

¹²⁰ Staff Proposal, at 37.

¹²¹ *Ibid.*

¹²² *Id.*, at 40. The Network Availability by PUMA Standard measures the percentage of time during a calendar day that the carrier's wireless network is available within that PUMA. Network Availability by PUMA should be calculated as: total minutes during the calendar day that the carrier's wireless network is available within the PUMA divided by total minutes in the calendar day, as a percentage.

¹²³ *Ibid.*

¹²⁴ Staff ask the Commission to delegate to Staff the authority to specify the reporting template, file format, submission method, and filing deadline.

providing weekly, monthly, and quarterly averages to compare performance across carriers and geographic areas.¹²⁵

Staff proposes that the Commission assess penalties on wireless carriers for not meeting the proposed network availability standard and for not submitting accurate reports in a timely manner, with failure to meet the proposed Network Availability by PUMA Standard resulting in a General Fund fine. The fine should be assessed per carrier, per PUMA, per day when daily network availability by PUMA falls below 99 percent, taking into consideration the severity of each noncompliant occurrence:

- If the Network Availability by PUMA is 90 percent or higher but below the 99 percent standard for a given day, then the fine is \$5,000 for each noncompliant PUMA;
- If the Network Availability by PUMA is 80 percent or higher but below 90 percent for a given day, then the fine is \$10,000 for each noncompliant PUMA;
- If the Network Availability by PUMA is 70 percent or higher but below 80 percent for a given day, then the fine is \$15,000 for each noncompliant PUMA; and
- If Network Availability by PUMA is below 70 percent for a given day, then the fine is \$20,000 for each noncompliant PUMA.¹²⁶

Staff also proposes that the Commission sanction carriers submitting erroneous data, incomplete data, and late reporting, with a penalty of at least \$500 for each offence.¹²⁷

¹²⁵ *Id.*, at 41.

¹²⁶ *Ibid.*

¹²⁷ *Id.*, at 41.

5.1. Positions of Parties

Parties disagree over whether the Commission should adopt this proposal and disagree over revisions.

SBUA, RCRC and CforAT in general support the proposal, asserting that reporting at more granular geographic spans, such as PUMA-level reporting, reveals disparities that statewide averages (or larger geographic spans) can conceal, as a carrier may report generally acceptable statewide performance while specific communities experience repeated outages, chronic dead zones, or persistent service degradation.¹²⁸

Noting the geographic size of some PUMAs, RCRC and CforAT ask the Commission to require county-level reporting for PUMAs that include more than one county.¹²⁹ Given that some PUMAs are large enough in size to include both an ESJ community and a non-ESJ community, SBUA asks the Commission to require that PUMA-level network availability data be cross-referenced against the Commission's existing ESJ community designations.¹³⁰ Noting that some PUMAs are as large as 19,000 square miles, T-Mobile questions whether a PUMA can be fairly characterized as a sound measure of "localized" concerns under any conditions or how any comparison across PUMAs would be relevant to any service quality issue due to their vast geographical and demographic scope.¹³¹

RCRC and CforAT recommend that the Commission include service failures due to network congestion as part of the reporting structure, asserting

¹²⁸ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 5. RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 4-5.

¹²⁹ RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 5.

¹³⁰ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 5-6.

¹³¹ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 19.

that carriers can prepare for predictable periods of localized congestion elsewhere, and how they choose to do so is within their business discretion. To the extent that localized performance reporting reveals recurring service quality issues such as network congestion, call completion failures, or other reliability issues in underserved PUMAs, RCRC and CforAT contend that this information should inform carriers' evaluation of existing network capacity and future infrastructure investment needs.¹³²

SBUA supports penalizing wireless carriers for noncompliance with the proposed rules but recommends the Commission also include a customer credit, asserting that a General Fund fine does not compensate customers for the direct impact of carrier noncompliance on them.¹³³

T-Mobile contends that this proposal has no record of support, solves no identifiable problem, has no demonstrated benefits, would require significant compliance costs and is otherwise unjustified.¹³⁴ T-Mobile adds that PUMAs bear no relation to wireless networks, cell site locations, Cal OES Outage Reporting, or to ZIP Codes.¹³⁵ AT&T and CTIA claim that Cal OES outage data does not support the proposed network availability mandate.¹³⁶ Verizon and AT&T contend that the proposed standard exceeds the scope of this proceeding and also strongly oppose this metric, asserting that it: 1) is too vague and ill-defined for meaningful comment; 2) is unsupported by the record and would impose

¹³² RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 5-6.

¹³³ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 3.

¹³⁴ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 18.

¹³⁵ *Id.*, at 21.

¹³⁶ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 19. AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 34-41.

double penalties for network outages; and 3) fails to consider that many factors cause network downtime beyond planned maintenance.¹³⁷ Verizon also argues that the proposed standard is technically infeasible to meet and would result in extreme penalties, asserting that a single site outage of 14.4 minutes could violate the 99 percent requirement, and in a PUMA with 53 sites, the outage of just one site for 24 hours drops availability to 98.13 percent, triggering penalties, and if theft or vandalism eliminated 10 sites, a 50-site PUMA would have availability of 80 percent, prompting a \$10,000 per day fine.¹³⁸ AT&T agrees, adding that the problem the Staff Proposal is hoping to fix is not caused by outages, but instead by coverage gaps, meaning a specific area lacks wireless coverage.¹³⁹

Additionally, CTIA states that Staff's analysis of PUMA-level network availability data is flawed, claiming that it does not establish whether any past outages would have run afoul of the new PUMA-based network availability metric,¹⁴⁰ nor does it discuss whether outages are outside the control of the carrier.¹⁴¹ CTIA also opines that it has demonstrated that competition among wireless providers already creates powerful incentives to maintain reliable networks, minimize outages, and deliver high-quality service at competitive prices, and wireless providers "compete vigorously on network performance, coverage, reliability, speed, and in efforts to deliver superior customer experience."¹⁴²

¹³⁷ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 18. AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 34-41.

¹³⁸ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 21.

¹³⁹ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 24-26.

¹⁴⁰ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 30.

¹⁴¹ *Id.*, at 31.

¹⁴² *Id.*, at 30.

AT&T asserts that using PUMAs artificially inflates rural outages.¹⁴³ AT&T also states that outage duration data “does not support a conclusion that ‘poorer’ or more remote communities experience longer outage durations than other areas.”¹⁴⁴ Cal Advocates counters that argument by cross-referencing the top ten PUMAs AT&T provides in its analysis¹⁴⁵ with 2024 American Community Survey median household income and poverty data. Cal Advocates asserts that “this concentration demonstrates a systemic geographic cluster of network degradation across low-income urban communities rather than isolated, random anomalies.”¹⁴⁶ Cal Advocates further contends that:

These ten worst-performing PUMAs also share key demographic traits, including high proportions of Hispanic, Asian, and immigrant residents, as well as Spanish-speaking households. This socioeconomic vulnerability also overlaps with significant environmental hardship. CalEnviroScreen from the California Office of Environmental Health Hazard Assessment of the California Environmental Protection Agency shows these areas... ranks among the high in California for pollution, poverty and linguistic isolation.¹⁴⁷

5.2. Discussion

The Commission does not adopt the proposed performance penalty at this time but instead will adopt a reporting requirement. As discussed more in Section 6, of this decision, the reporting requirement will combine both Cal OES outages and network availability. We discuss our determinations below.

¹⁴³ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 29-32.

¹⁴⁴ *Id.*, at 31.

¹⁴⁵ This data was filed under seal.

¹⁴⁶ Cal Advocates, Reply Comments on Staff Proposal, filed September 15, 2026, at 25-26.

¹⁴⁷ *Id.*, at 26.

To begin, using network availability was in response to the uptime metric introduced by the carriers. Industry panelists presented this data at the June 25, 2026 Workshop, including two charts prepared by CTIA, which CTIA and the carriers twice attempted to submit as “evidence.”¹⁴⁸ Further, the 99 percent figure used by Staff also comes from the carriers.

A significant flaw in using the dataset that industry parties present is that the large geographic span carriers use masks outages, which frequently occur on a smaller scale, not statewide or nationwide. In essence, their argument is that a long outage impacting service in Ukiah or a community in Lake County is a nonissue because there was no outage in Los Angeles and San Diego. Staff proposed PUMAs as a more granular geographic span. Therefore, the Commission dismisses carrier’s claims that this proposal is out of the scope of this proceeding.

Carriers and CTIA also claim to be unfamiliar with PUMA, but it was adopted in the Commission’s Affordability Proceeding (R.18-07-006). AT&T, CTIA, T-Mobile, and Verizon all were parties in that proceeding.¹⁴⁹

Regardless of the claims made above, we note that using both datasets in the manner proposed by Staff would be a new enforcement mechanism for the

¹⁴⁸ AT&T, CTIA, T-Mobile, and Verizon jointly filed two Motions to “Submit Aggregated Data Relevant to Issues in This Proceeding.” The first motion was filed on June 22, 2026. On August 4, 2026, CITA withdrew this Motion due to discovering “an error in the underlying data. The second Motion was filed on August 31, 2026. Both Motions include an Attachment A and Attachment B, which are two graphs that these four parties requested to be taken into evidence. On September 11, 2026, the assigned ALJ issued a ruling denying the August 31, 2026 Motion. At a minimum, evidence requires an attestation to the truth of the matter from an independent expert witness. AT&T, CTIA, T-Mobile, and Verizon did not make that attestation. Still, parties are permitted to use this information as argument.

¹⁴⁹ See, D.20-07-032, *Decision Adopting Metrics and Methodologies For Assessing The Relative Affordability of Utility Service*.

Commission, one where it is not yet understood exactly how the proposed penalty structure would function. In particular, it is not clear how often there would be an event triggering a penalty using the proposed Network Availability by PUMA standard, nor a way to determine ahead of time whether the proposed penalties are reasonable. Thus, the Commission does not adopt a penalty for a lack of performance.

6. Community Isolation Outage and Network Availability Reporting and Monitoring Requirements

As discussed in Sections 4 and 5 above, the Commission revises both the proposed community isolation outage and network availability standards to remove the penalties focused on performance. Instead, the Commission will adopt the reporting requirement standard, as discussed in this section.¹⁵⁰

We agree with the perspectives raised by industry parties that the causes of service outages and other network connectivity issues, such as those described by Lake County Supervisor Jessica Pyska at the June 25, 2026 Workshop are more complicated than just relying on Cal OES outage data and imposing penalties based on a carrier not being able to meet a standard relying on that data. At the same time, it is clear that the uptime statistics provided by industry do not adequately capture the experiences consumers face in the field.

¹⁵⁰ While the Commission does not adopt the penalty amounts contained in the Staff Proposal, we remind carriers of the following mandate in Pub. Util. Code Section 702:

Every public utility shall obey and comply with every order, decision, direction, or rule made or prescribed by the commission in the matters specified in this part, or any other matter in any way relating to or affecting its business as a public utility, and shall do everything necessary or proper to secure compliance therewith by all of its officers, agents, and employees.

We adopt a reporting and monitoring requirement where, on a quarterly basis, wireless carriers shall submit to the Commission reports that include the data discussed below. For the Cal OES Community Isolation Outage Standard, carriers' reporting must include: an incident ID, the location, time and duration of the outage, the cause, and whether the incident would meet one of the exemptions in General Order 133 and the appropriate justification. For the Network Availability by PUMA reporting requirement, reporting must include the network availability percentage for PUMA for each day in the quarter, average network availability percentage for each PUMA by week, month, and quarter, and planned maintenance duration and details and whether any incident affecting network performance would meet one of the exemptions in General Order 133 and the appropriate justification.

In most cases, the PUMA geographic span contains useful socioeconomic data, as it allows a comparison of different communities that are within the same counties. PUMA is the most granular unit identifiable in Public Use Microdata Sample datasets, which provide household level data that contains a sample of actual responses to the American Community Survey. The U.S. Census Bureau does not track that same data in the same manner on a countywide basis. Generally, PUMAs are designed to contain a similar population regardless of location. In practice, this means that PUMAs in rural areas can be much larger in terms of area than PUMAs in urban areas. Parties are correct that six PUMAs in California span over a large geographical area and contain more than one county, and it may be challenging to use PUMAs to assess network performance in these more rural areas. Thus, the Commission will collect additional county-wide information for the following counties: Alpine, Amador, Calaveras,

Inyo, Mariposa, Mono, Tuolumne,¹⁵¹ Colusa, Glenn, Tehama, Trinity,¹⁵² Del Norte, Lassen, Modoc, Plumas, Siskiyou,¹⁵³ Lake, Mendocino,¹⁵⁴ Nevada, Sierra,¹⁵⁵ Sutter, and Yuba.¹⁵⁶

The Commission delegates authority to Staff to prepare and update reporting templates that carriers must use.

7. Signal Propagation Mapping Requirement

GO 133-D required wireless telephone corporations to provide coverage maps on their websites and at retail locations and disclose equipment limitations so a customer understands what they “generally may expect” to receive adequate signal strength to place and receive calls when outdoors.¹⁵⁷ In adopting D.25-09-031, the Commission chose to remove this requirement and to not adopt a proposal from Staff to require wireless carriers to provide maps showing address level coverage. The Commission took this action because wireless carriers said they could not meet the proposed granularity requirements of providing maps due to technological limitations. The Commission essentially would be in the position of adopting a requirement wireless carriers could not meet.¹⁵⁸

¹⁵¹ Alpine, Amador, Calaveras, Inyo, Mariposa, Mono, and Tuolumne counties are in a single PUMA.

¹⁵² Colusa, Glenn, Tehama, and Trinity counties are in a single PUMA.

¹⁵³ Del Norte, Lassen, Modoc, Plumas, and Siskiyou counties are in a single PUMA.

¹⁵⁴ Lake and Mendocino counties are in a single PUMA.

¹⁵⁵ Nevada and Sierra counties are in a single PUMA.

¹⁵⁶ Sutter and Yuba counties are in a single PUMA.

¹⁵⁷ Staff Proposal, at 31.

¹⁵⁸ D.25-09-031, at 163-164.

Statements from Cal Advocates, in comments on the OIR and at the June 25, 2026 Workshop, show that carriers do have the ability to display improved maps on their websites for consumers to have more transparent information on their wireless coverage.

Cal Advocates asserts the following:

Current maps on carrier websites use 4G and 5G technology availability as a false proxy for available voice and data service. By showing technology types instead of actual performance metrics such as signal strength, these maps show only the category of network availability in an area — not whether the network is reliable enough to transmit voice calls. Even if availability of technology type was a reliable measure of data transmission, it is still problematic because 4G and 5G availability, the metric of the FCC National Broadband Map, is not a reliable proxy for wireless voice services. The ability to transmit data via a mobile device does not always equate to the ability to make a phone call. In addition, these maps are not granular enough to accurately predict available coverage in a given area, much less a specific address. Most importantly, these maps do not distinguish between indoor and outdoor coverage, as carriers are only required to report outdoor availability. This requirement provides little practical utility to consumers, who require reliable information to make critical safety-related choices and service quality choices regarding service at their primary residence.¹⁵⁹

Cal Advocates further argues that “AT&T and other providers already possess the sophisticated modeling capabilities required to produce accurate, high-granularity maps...” and the carriers “currently use topographically accurate engineering data to determine tower locations and validate signal strength.”¹⁶⁰ To support its position, Cal Advocates included a cell site

¹⁵⁹ Cal Advocates, Opening Comments on OIR, filed April 1, 2026, at 6.

¹⁶⁰ Ibid.

permitting application AT&T submitted to the City of Santa Cruz, which among other items, displays what AT&T's model expects to be reliable indoor coverage.¹⁶¹

Cal Advocates also notes that other international carriers utilize and provide this type of mapping to regulators such as the United Kingdom's Office of Communications (Ofcom) and France's Arcep.¹⁶²

Based on this information, Staff proposes that the Commission require wireless carriers to post interactive mobile voice signal propagation maps on their public websites so customers may check coverage by entering a specific street address, city, or ZIP code into the search bar. These interactive maps should distinguish expected service conditions using clear color categories based on signal strength thresholds. Following Cal Advocates' proposal, the maps must display the following thresholds: -84 dBm, -100 dBm, and -113 dBm. At a minimum, the maps shall be updated annually by January 31.¹⁶³ In addition, we require the carriers to submit the same shapefiles used to create the interactive display on their website to Communications Division on the same day the maps are annually updated.

Staff asserts that carrier coverage maps on their websites or submitted to the FCC are not rigorous enough to show whether customers can place and

¹⁶¹ Hammett & Edison, Inc., Consulting Engineers, AT&T Mobility Radio Frequency Statement, Santa Cruz County Planning Commission Agenda Materials, March 27, 2024, Exhibit 7, "Patrick Road CL @ 140' LTE 700 Coverage," at 37. Available (as of September 29, 2026) at: <https://www2.santacruzcountyca.gov/planning/plnmeetings/PLNSupMaterial/PC/agendas/2024/20240327/007a.pdf>.

¹⁶² Cal Advocates, Opening Comments on OIR, filed April 1, 2026, at 6-7. Cal Advocates cites Arcep (France) Decision No. 2024-1220, March 2020; Ofcom (UK), "Map Your Mobile coverage checker: methodology," August 2025; Ofcom (UK), "Connected Nations 2025: Methodology Annex," November 2025, at 11.

¹⁶³ Staff Proposal, at 45-47.

maintain calls indoors, in a vehicle, or outdoors. Wireless service depends on signal strength based on certain minimum thresholds, not merely whether a map shows a covered area using only in-vehicle mobile and outdoor stationary signal strength thresholds. A more rigorous signal strength threshold of -84 dBm RSRP is a 6 dBm increase over what AT&T designates as acceptable indoor coverage in their Santa Cruz application.¹⁶⁴ The 6 dBm increase accounts for signal loss expected when the signal to penetrates an exterior wall.¹⁶⁵ The Staff Proposal adopts this reasoning and the -84 dBm threshold, consistent with international regulators who similarly require wireless carriers to subtract a fixed signal margin to represent indoor coverage.¹⁶⁶

7.1. Positions of Parties

Parties disagree whether the Commission should adopt the proposal, with consumer and local government representatives supporting the proposal and industry parties opposing it.

RCRC and CforAT support the Staff Proposal, and argue that consumers should have access to “meaningful and measurable information regarding the service they are purchasing...” and that existing maps “... often convey an overly optimistic indication of network availability and do not necessarily reflect real-world service conditions experienced by consumers, particularly in mountainous, forested, or otherwise challenging rural terrain, but also in some locations that are part of urban areas where full coverage is expected by customers.”¹⁶⁷ While geographical factors remain relevant to the availability of

¹⁶⁴ *Supra*, at footnote 161.

¹⁶⁵ Cal Advocates, Opening Comments on the Staff Proposal filed September 8, 2026, at 15.

¹⁶⁶ Cal Advocates, Opening Comments on OIR, filed April 1, 2026, at 9.

¹⁶⁷ RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 8.

coverage regardless of the form of mapping provided, RCRC and CfoAT assert that measurable signal strength allows a more realistic way for customers to assess the likelihood of coverage.¹⁶⁸ Signal propagation maps are also useful to help identify areas where there are likely to be gaps in even outdoor coverage within areas that are identified as “served” by wireless technology.¹⁶⁹

SBUA supports the proposed requirement that wireless carriers publish signal propagation maps using Reference Signal Received Power (RSRP)¹⁷⁰ thresholds, rather than relying on generational labels like “4G” or “5G” that do not reflect actual call reliability, as well as the Staff Proposal’s differentiation between indoor, in-vehicle, and outdoor coverage using the RSRP thresholds. SBUA asserts that a business owner deciding whether wireless service can support its operations needs to know actual call reliability at the location where the business operates — not the generation of network technology available in the area.¹⁷¹

Cal Advocates asserts that consumers should be able to clearly understand where they are most likely to have available voice service, and consumers should not be solely reliant on the bars on their phones that are subject to no standard whatsoever.¹⁷² Cal Advocates adds that “If the carriers are the owners of the most up-to-date and accurate information regarding signal strength metrics, and

¹⁶⁸ Ibid.

¹⁶⁹ Ibid.

¹⁷⁰ RSRP is the average power of cellular reference signals received from a cell tower, measured in decibel-milliwatts (dBm). The greater the RSRP value, the stronger the cellular signal. RSRP is usually a negative number, so -84 dBm RSRP is stronger than -100 dBm. Because received cellular power at a handset is far below 1 mW, the numbers are usually negative.

¹⁷¹ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 5.

¹⁷² Cal Advocates, Reply Comments on Staff Proposal, filed September 15, 2026, at 7.

the customers have a contractual business relationship with these carriers, then customers should be able to get that information without needing to use third-party information that may be less accurate.”¹⁷³

RCRC and CforAT recommend that the Commission validate these maps or allow for public validation and make them publicly accessible not only on the carriers’ websites but also on the Commission’s website and, where feasible, integrate the maps with other publicly available datasets, including Cal OES Community Isolation Outage information and other public safety data layers.¹⁷⁴

RCRC and CforAT both state that requiring wireless carriers to display signal propagation and reliable indoor coverage is particularly important in the context of considering Carrier of Last Resort (COLR) implications, where wireless service is frequently presented by COLRs as a viable substitute for traditional wireline voice service. If wireless service is to be considered as a suitable alternative communications platform to meet universal, essential service, RCRC and CforAT assert that “consumers and regulators must have confidence that service can reasonably be expected to be functionally available where it is most likely to be used, including inside homes and businesses...” and that signal propagation mapping that “reflects likely indoor service availability provides one of the most practical and objective methods for evaluating whether wireless service can reliably fulfill that role.”¹⁷⁵

¹⁷³ *Id.*, at 16.

¹⁷⁴ RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 11-12.

¹⁷⁵ *Id.*, at 8.

SBUA recommends the Commission include a mechanism for a business to report when a posted signal propagation map does not match its real-world experience.¹⁷⁶

RCRC and CforAT note that some industry participants asserted security concerns and competition concerns based on disclosure of network infrastructure locations. Both parties assert that it is difficult to understand how signal propagation maps would provide a competitor with new knowledge regarding the existence or general location of wireless facilities. Further, these parties contend that many wireless facilities are deployed on leased infrastructure, co-located with other providers, attached to utility structures, or otherwise located within public rights-of-way where their presence is already readily observable. These parties also note that, to the extent that a signal propagation map shows that a carrier's service in an area is insufficient to serve customers effectively and that another carrier advertises that their service is superior to persuade customers to switch, that would be the exact function of competition that carriers assert exists to protect customers. RCRC and CforAT contend that this form of competitive pressure should be encouraged, not suppressed.¹⁷⁷

In general, AT&T, T-Mobile, and Verizon claim that there is no credible suggestion anywhere in the record that the current maps provided by carriers present any issue with consumers or that somehow this proposal would provide meaningful benefits to consumers.¹⁷⁸ AT&T and Verizon add that the proposed

¹⁷⁶ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 10-11.

¹⁷⁷ RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 12.

¹⁷⁸ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 36. Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 2. AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 36

rule seeks to resolve a non-existent problem, noting that customers generally do not have long-term service contracts, and that Verizon wireless customers have 30 days to test their service, while AT&T allows 14 days.¹⁷⁹

T-Mobile also states that the propagation mapping recommendation is misguided, unwarranted, potentially misleading and unlawful.¹⁸⁰

T-Mobile opines that propagation maps displaying indoor coverage are not “objectively better” than the maps that carriers currently use on their websites because they also would not be a guarantee of service because both are based on engineering modeling.¹⁸¹ T-Mobile also makes the following claims:

...publicly available mapping websites are already available. At least one of these websites (<http://map.coveragemap.com>) provides 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*. In addition, this site allows consumers to compare across carriers and even to get recommendations for the best plans in the area. In other words, the propagation map in the Staff Proposal already exists in an even more robust form than envisioned.¹⁸²

...there is no credible suggestion anywhere in the record that the current maps provided by carriers present any type of issue with consumers or that somehow this proposal would provide meaningful benefits to consumers.¹⁸³

¹⁷⁹ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 23-24.

¹⁸⁰ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 36.

¹⁸¹ *Id.*, at 34.

¹⁸² *Id.*, at 34-35.

¹⁸³ *Id.*, at 35.

In addition to the map on coveragemap.com, Verizon asserts there are two other public maps, the FCC Signal Strength Map and a Crowdsourced Map.¹⁸⁴

Verizon also asserts that coverage maps based on a single Commission-set RSRP value is flawed, especially since the specific thresholds lack an adequate evidentiary basis. In contrast to the Staff Proposal, Verizon opines that the FCC “has recognized that RSRP or RSSI values may vary based on factors such as the spectrum and, network design, and device operating capabilities...” and that the FCC rejected proposals to prescribe a minimum RSRP threshold, concluding: “We agree with the majority of commenters that, given the variety of factors that may affect signal strength, we should not adopt a standardized minimum signal strength parameter value.” Verizon also claims that the FCC specifically noted Verizon’s comments that “[b]ecause there is no single RSRP value that is always the ‘correct’ RSRP for a given speed target, the Commission cannot standardize a minimum RSRP value.”¹⁸⁵

In response to industry security concerns, RCRC and CforAT contend the following:

The issue of whether more precise signal information raises security concerns is also a distraction from the primary policy objective of this proceeding: ensuring consumers, regulators, and policymakers have accurate information regarding actual service availability and indoor coverage performance. Achieving that objective does not require public disclosure of sensitive infrastructure details or the precise location of individual facilities; rather, it aggregates data that is already available. Clear maps based on a uniform standard of signal strength, which can be independently validated, are more

¹⁸⁴ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 25-26. Verizon does not provide additional explanation regarding the referenced Crowdsourced Map.

¹⁸⁵ *Id.*, at 24-25.

helpful than ad hoc consumer reliance on various websites and services that already exist, but the carriers noted at the recent workshop such various sources of information do already exist. Here, what the Commission is considering is a requirement that rests on independently validated coverage information that more accurately depicts whether consumers are likely to be able to obtain reliable indoor wireless service from a given provider. Consumers need accurate information about service availability, not engineering specifications regarding the underlying network. Accordingly, infrastructure confidentiality concerns can be reasonably accommodated but should not be used as a basis to limit the transparency, accessibility, or usefulness of signal propagation maps intended to inform consumer choice and regulatory oversight.¹⁸⁶

AT&T argues that the proposed mapping requirements would impose an unnecessary burden on carriers, would not be based on any demonstrated need, would provide no corresponding benefit and would likely confuse consumers, rather than provide additional useful information to allow decisions between providers, and should be rejected. Instead, AT&T recommends the Commission adopt a customer education and transparency resource on the Commission's website explaining how existing wireless coverage maps should be understood, why indoor and outdoor experiences may differ, and where customers can find existing federal and carrier coverage resources. AT&T asserts this approach would advance transparency without imposing unsupported signal-strength thresholds or requiring maps that may mislead rather than assist customers.¹⁸⁷

¹⁸⁶ RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 12.

¹⁸⁷ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 49-54.

Cal Advocates counters that wireless carriers already must submit broadband propagation maps to the FCC.¹⁸⁸

7.2. Discussion

As noted above, the Commission previously required wireless telephone corporations to provide coverage maps on their websites. The Commission eliminated that requirement when it found those specific maps were no longer useful. This new mapping requirement is a significantly more useful tool than what the Commission once required.

Additionally, complaints about the accuracy of the mapping of wireless coverage are well-known and often repeated, including numerous findings by this Commission, which are grounded both in the facts about wireless signal propagation in specific cases, as well as public feedback.¹⁸⁹ Some carriers and

¹⁸⁸ Cal Advocates, Reply Comments on Staff Proposal, filed September 15, 2026, at 8.

¹⁸⁹ See, e.g., D.25-12-004, *Decision Denying In Part Pacific Bell Telephone Company D/B/A AT&T California's Application To Relinquish Eligible Telecommunications Carrier Designation* (A.23-03-002), issued December 5, 2025, at 57-62. See also, Resolution T-17437, which conditionally approved the ETC application of TAG Mobile, LLC at 15, Resolution T-17436, which conditionally approved the ETC application of Boomerang Wireless, LLC, at 15, Resolution T-17466, which conditionally approved the ETC application of Global Connection, Inc. of America, doing business as "Stand Up Wireless," at 14 and Resolution T-17448, which conditionally granted the ETC application of Air Voice Wireless, LLC at 17:

Although wireless phone service offers great mobility for consumers, there are safety concerns related to wireless mobile phone service and E-911 and/or 911 connection limitations. Where there is a lack of coverage, poor signal strength, or atmospheric or terrain conditions that affect connections, emergency calls may not be completed. In rural areas, for example, with spotty connectivity or interference (e.g. due to geographic or structural obstacles), wireless mobile resellers of wholesale facilities service cannot guarantee full, accessible emergency connections for their own direct customers.

See also, Order Instituting Investigation into the State of Competition in the California Communications Market (I. 15-11-007), Decision (D.)16-12-025, at 53.

Footnote continued on next page.

CTIA continue to dispute these facts. However, industry's concerns that more granular maps will give competitors a better insight into where they offer service¹⁹⁰ raised a question as to the accuracy of the current maps on the carrier websites. The same arguments apply to the so-called national security concerns certain parties raise.¹⁹¹

The mapping requirements combined with the reporting requirements adopted in this decision, are intended to improve the information collected as to where mobile voice coverage actually exists and provide additional context to why outages, call drops and other events perceived as outages occur and where.

See also, Resolution T- 17480, Approval of Funding for the Grant Application of Race Telecommunications Inc. (U-7060-C), from the California Advanced Services Fund (CASF) in the Amount of \$2,239,991 for the Gigafy Backus Unserved Broadband Project, issued August 19, 2015, at 5-6: "[T]he Commission's broadband availability map indicates that the project areas... and surrounding areas are "served" by mobile providers... Verizon Wireless and AT&T Mobility. Subsequently, CD required tests be conducted in the project area by Race. Tests were conducted for Verizon Wireless on March 5, 2015, and for AT&T Mobility on May 6, 2015. These test results showed the project is actually unserved by mobile despite that indicated on the published availability map." See also, Resolutions T-17503 at 4-5 and T-17524 at 5, for similar discussions.

¹⁹⁰ *See*, Cal Advocates, Opening Comments on Staff Proposal, filed September 8, 2026, at 16:

During the second workshop discussion of propagation maps, AT&T Assistant Vice President and Senior Legal Counsel, Raymond Bolaños, stated that the maps, if required, "invites some concerns competitively because now we're telling our competitors 'Hey, this is where we are and this is our signal strength.'" The concern seems to be that allowing competitors to find out where others carriers' coverages are weak would lead to competitors' targeting of those weaker areas for competition.

¹⁹¹ *Id.*, at 10-11:

During the second workshop, as part of the discussion regarding propagation maps, AT&T representative Raymond Bolaños raised concerns about carriers being required to publish propagation maps online. He suggested that doing so means "jeopardiz[ing] critical infrastructure."31 Mr. Bolaños went on to suggest that demonstrating the strength of coverage presents "very real national security and local security issues.

In other words, determining whether a perceived outage is actually the result of a lack of coverage should start with a more realistic understanding of where there is network coverage. This is both a public transparency initiative and part of a broader reporting and monitoring effort.

Moreover, this requirement will provide important data for other Commission proceedings. As noted by RCRC and CforAT, AT&T and other COLRs are attempting to be relieved of their COLR responsibilities on the grounds that wireless carriers can replace their service. Mapping that depicts indoor coverage is essential to evaluating those claims.

We dismiss several claims made by CTIA, AT&T, T-Mobile, and Verizon.

AT&T's claims that the mapping in its City of Santa Cruz application display mobile broadband coverage and not voice coverage are not accurate.¹⁹² As noted by Cal Advocates, AT&T engineer James Temple provided the following explanation of the same map in an AT&T permitting application to the City of Santa Cruz:

The green shaded areas of the map depict acceptable in building coverage. In-building coverage means customers are able to place or receive a call on the ground floor of a building. The yellow shaded areas depict areas within a signal strength range that provide acceptable in-vehicle service coverage. In these areas, an AT&T customer should be able to successfully place or receive a call within a vehicle. The blue and white shading depicts areas within a signal strength range in which a customer might have difficulty receiving a consistently acceptable level of service.¹⁹³

¹⁹² Verizon also cites this statement as fact. See, Verizon Opening Comments on Staff Proposal, filed September 8, 2026, at 24.

¹⁹³ Cal Advocates, Reply Comments on Staff Proposal, filed September 15, 2026, at 2.

Additionally, T-Mobile's claim that the map at <http://map.coveragemap.com> already displays what Staff proposes is inaccurate. This map attempts to depict mobile broadband coverage, not voice. This proceeding is focused on voice service. Moreover, coverage on this map is indicated with large squares or hexagons, which is not an accurate display of radio frequency propagation.

We also note that Verizon conflates broadband and voice mapping when describing the FCC's Form 477 Modernization proceeding.¹⁹⁴ As Cal Advocates notes, the FCC declined to set a threshold signal level that carriers had to meet in order to consider an area properly served by broadband data services, not voice.¹⁹⁵ Further, in the comment Verizon cites, the FCC refers to a given speed target and its association with signal strength.¹⁹⁶ However, as Cal Advocates also notes, the FCC does require wireless broadband propagation maps.

Additionally, as noted by Cal Advocates, the proposal for Commission consideration is not setting a minimum threshold that must be met by the carriers.

We also disagree with the framing by carriers that the proposed rule requires carriers to post inaccurate information on their websites or somehow restricts their free speech. The three wireless carriers are required to post maps on their websites that display interactive maps with the following

¹⁹⁴ *In the Matter of Establishing the Digital Opportunity Data Collection Modernizing the FCC Form 477 Data Program*, WC Docket Nos. 19-195, 11-10, Third Report and Order, FCC 21-20 (FCC 21-20) (Rel. Jan. 19, 2021).

¹⁹⁵ Cal Advocates, Reply Comments on Staff Proposal, filed September 15, 2026, at 7.

¹⁹⁶ *Ibid.*

thresholds: -84 dBm, -100 dBm, and -113 dBm, and update those maps annually by January 31 of each year. If carriers wish to provide additional context, the Commission's rules do not restrict that activity. In addition, we require the carriers to submit the same shapefiles used to create the interactive display on their website to the Communications Division on the same day the maps are annually updated.

Finally, we note that the record in this proceeding demonstrates that the cost for carriers to implement this rule is minimal. AT&T estimates that "producing, hosting, and updating the proposed signal propagation maps would require additional staffing time" but AT&T "does not presently estimate a material incremental cost beyond that staffing effort."¹⁹⁷ T-Mobile did not provide a cost estimate amount, stating that propagation maps in general already exist.¹⁹⁸ Verizon's estimate is *de minimis*.¹⁹⁹ Verizon also states that it would incur "significant, recurring labor costs" to respond to customer questions or complaints or to customers from other states questioning why a similar coverage map is not available to them, or if Verizon would need to respond to complaints compiled by the Commission's Consumer Affairs Branch relating to the maps.²⁰⁰

8. Customer Service Requirements

General Order 133-E contains the following customer service requirements for telephone corporations with 5,000 or more access lines providing POTS and fixed interconnected VoIP service:

¹⁹⁷ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at Attachment A-2.

¹⁹⁸ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 39.

¹⁹⁹ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at Exhibit 5. Exhibit 5 was filed under seal.

²⁰⁰ *Id.*, at 41. Verizon does not estimate these costs.

1. Maintain a local, toll-free or collect call telephone access line which will be available to its subscribers 24 hours a day, seven days a week: At minimum, trained company representatives will be available to respond to customer telephone inquiries during normal business hours (Monday to Friday between 8 a.m. and 5 p.m. Pacific Standard Time). After normal business hours, a call may be answered by a service or an automated response system, including an answering machine. Inquiries received after normal business hours must be responded to by a trained company representative on the next business day.
2. A customer representative must answer 80 percent of the customer service calls within 60 seconds. Telephone corporations may offer a callback service. If customers choose to use this callback service, and a customer service representative responds to the customer service call within 24 hours, then this call will not count against meeting this criterion.
3. Provide a postal mail component for customer service inquiries. The postal mail contact must be provided on the company's website, via the customer service telephone line, and bill inserts.
4. Resolve billing-related inquiries within 90 days from the initial customer inquiry.
5. All outage-related inquiries must be directed towards the appropriate wireless standards.²⁰¹

Staff proposed that the Commission apply all five standards to wireless service, with two clarifications.

For purposes of this proceeding only, the first clarification is that the 60-second response time begins from the point when a customer requests to speak with a representative or agent, rather than at the start of the call, and that the option to speak with a representative or agent is the first prompt presented to

²⁰¹ General Order 133-E, at 8-9.

the customer.²⁰² The Staff Proposal states that these changes ensure that the 60-second standard measures a carrier's actual response time once a customer has clearly requested live assistance. Staff proposes this requirement to reduce customer hold times, but also balance carrier costs, asserting that this will allow carriers to continue using interactive voice response (IVR) systems for initial call routing while still ensuring customers are not made to wait unreasonably long once they have asked for live assistance.²⁰³

The second revision that Staff proposes for wireless service is to reduce the callback window from 24 hours to 30 minutes. The Staff Proposal states that a 24-hour window does not reflect the practical reality that customers experiencing a service issue are unlikely to remain available or continue waiting for a resolution for a full day. Staff cites the unreasonableness of requiring customers to remain on standby for several hours for a callback, with the fact that callback functionality is 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.²⁰⁴

The Staff Proposal recommends that the Commission require carriers to file reports quarterly to indicate compliance with each of the five requirements. Staff proposes a penalty of \$20,000 per day for each day of noncompliance and a \$500 per offense penalty for erroneous data, incomplete entries, and late submissions.²⁰⁵

²⁰² Staff Proposal, at 43.

²⁰³ *Id.*, at 43-44.

²⁰⁴ Staff Proposal, at 44.

²⁰⁵ *Id.*, at 45.

Staff asks the Commission to delegate to it the authority for preparing the reporting template.²⁰⁶

8.1. Positions of Parties

Parties in general disagree over whether the Commission should adopt the Staff Proposal.

As wireless service increasingly replaces legacy landline service, RCRC and CforAT assert that consumers should have consistent expectations regarding access to customer support and problem resolution regardless of the underlying technology used to provide voice communications.²⁰⁷

SBUA, RCRC and CforAT support penalizing wireless carriers for noncompliance with the proposed rules but recommend the Commission also include a customer credit, asserting that a General Fund fine does not compensate customers for the direct impact of carrier noncompliance on them.²⁰⁸ RCRC and CforAT state that “A refund requirement makes the customer whole by returning payment for service that the carrier failed to provide, while a penalty mechanism is an administrative fine meant to encourage compliance with laws and regulations and deter future violations.”²⁰⁹

In general, T-Mobile argues that the Staff Proposal does not recognize the nationwide (not state-specific) nature of customer care operations, demonstrate any potential benefits of its proposed customer care standards, and does not identify a credible problem it is intended to address. T-Mobile asserts that, if

²⁰⁶ Ibid.

²⁰⁷ RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 6-7.

²⁰⁸ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 3. RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 7.

²⁰⁹ RCRC and CforAT, Opening Comments on Staff Proposal, filed September 8, 2026, at 7.

adopted, the proposed standards would force providers to incur significant compliance costs to alter their customer care operations to no end other than regulatory compliance.²¹⁰

In general, CTIA asserts that the customer service rules proposed by Staff are more burdensome than the requirements already in GO 133-E, and the Staff Proposal fails to identify any non-hearsay evidence demonstrating a problem that would justify the proposed rules. Instead, CTIA opines that the Staff Proposal relies on selected anecdotal statements offered at PPHs and workshops to purportedly support what CTIA considers to be significantly more onerous customer service obligations.²¹¹

Verizon contends that the proposed Customer Service rules would “thwart innovation, harm customers, and impose costs that will redirect resources that could improve network quality to implement an evidence-free mandate on how Verizon communicates with its customers” adding that they “are derived from monopoly regulation-era metrics and incompatible with providers’ flexible, efficient, and customer-focused customer service operations.”²¹² Verizon also asserts the proposed rules would impose a higher and conflicting call-back standard on wireless companies than is currently imposed on wireline providers and would compel flexible, low-cost, digital-only business models to overhaul their low-cost business offerings and/or exit California. Verizon contends this result harms competition and consumers.²¹³ In particular, Verizon notes that its affiliate, Visible Service LLC (Visible), does not have call-center customer service

²¹⁰ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 31.

²¹¹ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 32-33.

²¹² Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 2.

²¹³ Ibid.

agents answering phone inquiries. Instead, Visible advertises its digital-only platform to customers who value its low prices and do not require phone calls with their provider. Customers who enroll with Visible can reach Visible over chat, the app, or social media channels. Verizon argues that customers appreciate this flexibility and voluntarily opt into this platform, and that the proposed answer time standard and requirement for a live agent may require Visible to completely revise its low-cost business platform and ultimately raise prices or exit California.²¹⁴

8.1.1. Answer Time Requirement

SBUA clarifies that its support for beginning the answer time shot clock upon request, rather than at call initiation, was conditioned on customers being able to clearly and immediately ask for a live agent, rather than being routed through an ambiguous or extended menu first.²¹⁵

In general, T-Mobile argues that the Staff Proposal:

ignores the uncontested record evidence that, among other attributes of current customer practices: (i) an ever-increasing number of customers prefer automated options (IVR, chat, web access) to address the simpler matters around billing, activation, and the like and (ii) for more complex issues (or for those customers that prefer to speak with a live representative), it is critical that the customer 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.²¹⁶

²¹⁴ *Id.*, at 10.

²¹⁵ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 6-7.

²¹⁶ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 25.

T-Mobile asserts that the record establishes that although Average Speed of Answer is still used, it is generally recognized as an inadequate proxy for customer experience, given the availability of other options to customers.²¹⁷

AT&T argues the proposed rule requiring 80 percent of calls to be answered in 60 seconds would worsen customer service, asserting that a wireless call-center environment is fundamentally different from a wireline environment, in terms of handling exponentially higher call volumes and managing more complex service plans that may include a broad range of available wireless devices, device financing, device insurance, international roaming, personal hotspots, and multi-line family plans. AT&T also contends that the application of a wireline-derived metric to the materially different wireless context, without any adjustment, is further evidence of the arbitrary nature of the Staff Proposal²¹⁸

AT&T also asserts that “It is patently arbitrary and capricious to apply one industry’s metric to an entirely different technology and market structure without any analysis of its applicability.”²¹⁹

AT&T and T-Mobile argue that the concept of a “first prompt” as proposed, is unclear and that practice is outdated, as modern systems generally direct calls based on a customer’s description for the reason they are calling customer service.²²⁰ Verizon also states that the proposal is unclear regarding when call answer time tracking begins. Moreover, despite acknowledging

²¹⁷ *Id.*, at 26-27.

²¹⁸ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 5.

²¹⁹ *Ibid.*

²²⁰ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 29-30. AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 6-10.

Verizon's concerns,²²¹ Verizon asserts that the Staff Proposal's "first prompt" clarification compounds them, arguing that:

...if a prompt for the option to speak to a live agent is required as soon as the IVR connected, customers would be denied the benefit of Verizon's efficient and personalized IVR process designed to route customers to the representative best suited to meet the individual's specific issues. Instead customers would be transferred to what would essentially be a human switch board where they would likely be asked all of the same questions as the IVR would ask before being transferred again. Not only would this add time to the customer service process, without the benefit of a streamlined IVR process, but the customer could experience multiple transfers to get them to the appropriate representative, which would ultimately lead to a longer and more frustrating process for the customer.²²²

AT&T also contends that "natural-language IVR system routes customers to specialized teams," meaning a customer calling about an international roaming issue, for example, is currently routed to an agent with international-plan expertise. AT&T asserts that under the first-prompt requirement, that customer would instead reach a general-purpose agent who may lack the specialized knowledge to resolve the issue, necessitating a transfer and further delay, the very outcome the Staff Proposal purports to prevent.²²³

²²¹ The Staff Proposal cites Verizon's claim that costs would "increase[] significantly if an IVR cannot be used to respond to calls initially," and summarizes Verizon's suggestion during the June 25 Workshop that the "60-second window only begins when the customer has affirmatively requested a representative or agent" because it would "allow carriers to continue using IVR systems for initial call routing while still ensuring customers are not made to wait unreasonably long once they have asked for live assistance."

²²² Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 5.

²²³ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 10.

All three carriers state that complying with proposed one prompt requirement will result in them incurring excessive costs,²²⁴ with some carriers stating that the reason for the costs would be the need to build a new IVR system.

8.1.2. Call Back Time

Verizon, T-Mobile and CTIA argue that the proposed 30 minute call back time requirement, which is different than the 24 hour requirement applied to POTS and VoIP service, lacks any basis in the record, is more burdensome and costly to implement than the 24-hour callback standard.²²⁵ Verizon asserts that if required, this standard would prevent Verizon from offering customers a scheduled callback option and may hinder Verizon's ability to offer any callback option because it is too difficult to meet.²²⁶ AT&T adds that:

During a major natural disaster (in which overwhelming numbers of customers may simultaneously seek service-restoration information), a carrier may receive tens of thousands of callback requests within a single hour. In such a scenario, a 30-minute callback window would prove logistical impossibility, absent the creation of a permanent workforce sized for catastrophic-event peaks. The 30-minute callback requirement would thus effectively eliminate the callback option as a viable alternative for managing call volume, since the staffing required to guarantee 30-minute callbacks would approach or exceed the staffing required to answer all calls live, negating any efficiency benefit of offering a callback option in the first place.²²⁷

²²⁴ *Id.*, at 11-13.

²²⁵ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 2. T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 28-29. CITA, Opening Comments on Staff Proposal, filed September 8, 2026, at 34.

²²⁶ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 12.

²²⁷ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 15.

8.1.3. Billing Dispute Resolution Timeframe

SBUA states the proposed 90-day timeframe to resolve billing disputes is a hardship for a small business because a small business owner typically handles a billing dispute personally rather than through dedicated staff, and that every day the dispute remains open is a day diverted from running the business. SBUA recommends the Commission adopt a 30-day resolution window.²²⁸

AT&T contends that there is no evidentiary demonstration that 90 days is a reasonable or necessary timeframe, no data showing that carriers fail to resolve billing disputes within a reasonable period, in any case, and no showing that this 90-day mandate is necessary or appropriate.²²⁹ However, AT&T proposes to keep the 90-day requirement in General Order 133-E, coupled with reporting over a two-to-three-year period to allow the Commission to assess whether wireless customers are experiencing systemic billing inquiry resolution problems before considering any modification to existing standards.²³⁰

8.1.4. Penalty Mechanism

Verizon complains that the Staff Proposal does not explain the determination regarding the \$20,000 daily fine being appropriate or reasonable, or whether it will ensure compliance with all components of the proposed Customer Service Standard. The Staff Proposal also does not include an explanation over why wireless providers should be subject to a different and far higher fine amount than wireline or VoIP providers). Additionally, Staff has not explained why a daily fine calculation is necessary for the Wireless Provider

²²⁸ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 3.

²²⁹ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 16.

²³⁰ *Id.*, at 54-55.

when the fine mechanism in G.O. 133-E is based on monthly compliance.²³¹

AT&T agrees, adding that the proposed penalty does not consider the number of customers affected, the severity of the noncompliance, nor whether the provider was at fault. For example, AT&T argues that a carrier not complying with the postal requirement would be treated that same as a carrier that fails to answer 80 percent of calls within 60 seconds.²³²

Regarding the proposed penalty for not submitting reporting data in a complete or timely manner, Verizon argues that the terms “erroneous data” and “incomplete entry” are so vague that any data that Staff thinks is not “complete” or “correct,” even if the submitting provider disagrees, would be subject to this automatic fine. Verizon states “This strict liability penalty would not provide fair notice to providers and could be impossible for providers to meet, depending on Staff’s subjective interpretation.”²³³ Additionally, Verizon asserts that the Staff Proposal does not explain why a \$500 fine is appropriate, reasonable, or will help to deter mistakes or errors in submitted data. Providers should be afforded the reasonable opportunity to cure any alleged incomplete or incorrect data before any penalties are issued.

AT&T argues that the proposed penalty is excessive and in violation of the Eighth Amendment’s Excessive Fines Clause, incorporated against the states through the Fourteenth Amendment.²³⁴

²³¹ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 13.

²³² AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 17.

²³³ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 12.

²³⁴ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 20-21.

8.1.5. Reporting

SBUA asserts that requiring carriers to report compliance with the Customer Service Standard “at the company level” means the Commission would have no way to determine whether small businesses, or businesses in ESJ communities, experience worse customer service outcomes than the statewide average. SBUA recommends the Commission require disaggregation by ESJ community designation and that small business accounts be separately identifiable and separately tracked where feasible.²³⁵

8.1.6. Other

SBUA notes two findings in a J.D. Power Study regarding mobile carrier customer service:

- Ease of resolving a problem is strongly correlated with overall satisfaction: customers who agreed that resolving a problem required minimal effort recorded an ease-of-doing-business score of 786, compared to 554 for customers who disagreed — a gap of more than 200 points; and
- The speed of digital resolution matters independently of speed of telephone pickup: customers who resolved issues in ten minutes or less through a carrier’s website or app reported meaningfully higher satisfaction than those whose digital resolution took longer.²³⁶

SBUA contends that the Staff Proposal addresses speed with which a call is answered, but recommends the Commission also adopt a metric regarding the ease of resolving a problem.²³⁷

²³⁵ SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 7.

²³⁶ *Id.*, at 9.

²³⁷ *Id.*, at 10.

AT&T opposes the proposal to apply the postal mail component for customer service inquiries in General Order 133-E to wireless carriers.²³⁸

8.1.7. First Amendment Arguments

AT&T and Verizon claim that the new Customer Service Standard would force wireless carriers to change their own speech and result in “compelled speech,” arguing that would trigger First Amendment scrutiny. In particular, Verizon asserts that the proposal would require wireless carriers to reconfigure IVR systems to provide customers with the option to speak with a live agent, also called the “first prompt” requirement, and would force the wireless carriers to change their own speech — by restructuring their tailored IVR processes to announce an option to speak with a live agent at the first prompt.²³⁹ Verizon contends this proposed requirement would “interfere with Verizon’s customer service processes and communications to ensure that the customer is routed to the best available customer service representative trained to meet the specific customer’s issue.”²⁴⁰

TURN disagrees with the interpretation offered by various industry parties. While TURN acknowledges that corporations do have some First Amendment rights, TURN asserts that the applicable standard in this instance comes from *Zauderer v. Office of Disciplinary Counsel*. In *Zauderer*, TURN contends the Court held that disclosure requirements do not implicate a company’s First Amendment rights “as long as disclosure requirements are reasonably related to

²³⁸ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 15-16.

²³⁹ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at 11. AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 21-22.

²⁴⁰ Ibid.

the state's interest in preventing deception of consumers."²⁴¹ TURN argues that the right of a commercial speaker to not divulge accurate information regarding their services (*i.e.*, to not speak) is not a fundamental right. TURN further asserts that *Ohralik v. Ohio State Bar Association* holds that:

...it has never been deemed an abridgment of freedom of speech or press to make a course of conduct illegal merely because the conduct was in part initiated, evidenced, or carried out by means of language, either spoken, written, or printed. In essence, the state does not lose its power to regulate commercial activity deemed harmful to the public whenever speech is a component of that activity.²⁴²

TURN also contends that:

Under Planned Parenthood of Southeastern Pennsylvania v. Casey, the Court held that requiring doctors to explain to patients about the nature and health risks involved with certain procedures did not violate free speech, as the law was 'part of practicing medicine' and only an incidental regulation of speech.²⁴³

TURN argues that the analysis used in *Casey* is the same, in that the proposed Customer Service Standard would require carriers to promptly share factual information about services they offer (*i.e.*, through assistance from a human representative) to reduce potential misrepresentations or confusion about their services. As such, the strict scrutiny CTIA and Verizon argue is necessary to adjudicate these Customer Service Standard is inapplicable.²⁴⁴ Moreover, TURN argues that the proposal leaves in place existing IVR structures for consumers to use if they are unsure which path would most effectively address their issue but

²⁴¹ TURN, Reply Comments, filed September 15, 2026, at 44. Citation omitted.

²⁴² *Id.*, at 44-45. Citation omitted.

²⁴³ *Id.*, at 45. Citation omitted.

²⁴⁴ *Ibid.*

also provides fast tracks for consumers who would like to connect to a human agent as quickly as possible.²⁴⁵

8.2. Discussion

The Commission revises several portions of this proposed rule for wireless service and then adopts it.

It is reasonable to conclude that customers of POTS, VoIP and wireless services expect the same level of customer service, especially regarding the amount of time it takes to answer their phone calls or to speak with a live agent. This is not a situation where those services should be treated differently due to the inherent differences in wireless and wireline service.

The record contradicts industry parties' assertions that there is no record of a problem. For example, CTIA states that the Staff Proposal:

...cites no statistical evidence or studies regarding average customer service wait times for wireless providers, no statistically valid survey or analysis of consumer experiences, and no admissible evidence showing that existing wait times are unreasonable or otherwise warrant regulatory intervention.²⁴⁶

Absent from CTIA's commentary is the delays of AT&T, T-Mobile, and Verizon, all CTIA members, in submitting this data, despite the Commission ordering it on multiple occasions. The carriers did not provide complete responses until July 27, 2026, or even later, in some cases, given the data carriers included in their opening comments.

When adopting the OIR for this proceeding, the Commission ordered AT&T, T-Mobile, and Verizon to submit data and information by April 1, 2026,

²⁴⁵ Ibid.

²⁴⁶ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 33.

including “Existing company customer service standards and internal service quality standards or key performance indicators that each company tracks and strives to achieve.”²⁴⁷ The carriers’ submissions were incomplete.²⁴⁸ At the June 25, 2026, Workshop, the three wireless carriers were expected to present those details.²⁴⁹ Panelists representing the three wireless carriers did not present that information. At the June 25, 2026 Workshop, the assigned ALJ asked for customer satisfaction metrics, including average call wait time, and the panelists

²⁴⁷ OIR, at 12.

²⁴⁸ Administrative Law Judge’s Ruling Ordering AT&T, T-Mobile, And Verizon to Produce Previously Ordered Data, issued July 10, 2026, at 2. AT&T, T-Mobile, and Verizon filed and served their responses on April 1, 2026. AT&T filed and served an amended response on April 17, 2026. T-Mobile filed and served two amended responses, respectively on June 1, 2026, and July 2, 2026. Verizon filed an amended response on June 11, 2026. All three carriers have not complied in full with Section 5 of the OIR.

²⁴⁹ *See*, Ruling of Assigned ALJ Noticing Workshop, issued June 5, 2026, at 1-2: “The focus of this workshop is to give parties a chance to present on the issues within the scope of this proceeding... Carriers shall make available subject matter experts to present, either the individuals that made the declarations submitted in response to the Order Instituting Rulemaking,¹ or another individual sufficiently familiar with the material.”

See also, procedural email from the assigned ALJ, dated June 5, 2026, in which the assigned ALJ served the Agenda for the June 25, 2026 Workshop on the Service List. Page 3 of the Agenda includes the following instructions to carrier panelists participating in the Customer Service Metrics session:

Please include an overview of the performance standards your company currently measures and tracks as they relate to customer service, what tools or systems you use to monitor, and what are your company’s customer service standards.

General Order 133-E has a Customer Service Standard that incorporates the following performance metrics: ... require(ment that) customer representative(s)... answer 80% of... customer calls within 60 seconds...

Carrier panelists also were asked the following questions:

Does your company already track these performance standards or something similar? Please provide details on standard and implementation details. Please indicate how much incremental costs, if any, are required to track and meet these performance standards.

did not provide that information.²⁵⁰ The carriers did not provide the Commission with their average call wait time (or average answer time, as some carriers may refer to it) until July 28, 2026, did not respond in full to the Commission's data requests until their September 8, 2026 opening comments, and, as discussed later, some responses in the September 8, 2026 opening comments contradict previous responses or raise credibility concerns.

Staff recommendations are based on the information and data provided. The Commission can only make findings based on the record it has. While the carriers and CTIA are entitled to advocate their positions in a zealous manner, they cannot fail to provide information that they have control over and then argue that there is a lack of information in the record to support a premise. The Commission also is not required to postpone a proceeding when a party fails to provide information or intentionally delays.

The data provided by the carriers support the Commission adopting the Customer Service Standard set out in GO 133-E with some additional distinctions. AT&T, T-Mobile, and Verizon submitted their answer time data in slightly different formats, with Verizon submitting the data as it would be reported if the provision in General Order 133-E were adopted for wireless service, while AT&T and T-Mobile submitted their average answer time. AT&T and T-Mobile's data is national. The three wireless carriers filed that information

²⁵⁰ Administrative Law Judge's Ruling Issuing Staff Proposal, issued August 19, 2026, Attachment B, Summary of the June 25, 2026 Workshop Discussing Service Quality Rules for Wireless Carriers, at 15. The assigned ALJ "asked for customer satisfaction metrics, including average call wait time, average time to resolution, and other data regarding KPIs. AT&T said most of that information is confidential, but the average handle time is 14 minutes and 37 seconds. T-Mobile said the data are confidential, but it can send the data confidentially. Verizon said the information is confidential, but it was covered in Verizon's latest filing."

confidentially. A review of the carriers' average answer times supports the need for firm requirements.

The record contains additional information.

SBUA includes in its comments data from the J.D. Power 2026 U.S. Wireless Carrier Satisfaction Study – Volume 1²⁵¹ which measured overall customer satisfaction on a 1,000-point scale. T-Mobile scored 631. Verizon scored 593. AT&T scored 587.²⁵² Those scores indicate customer dissatisfaction.

Additionally, CTIA includes the 2026 American Customer Satisfaction Survey, in which wireless phone service scored 77 out of 100, stating that it indicates that consumers of wireless services “experience high levels of customer satisfaction.”²⁵³ Despite CTIA's claim, a score of 77 out of 100 does not indicate “high” customer satisfaction.

Thus, the record supports establishing customer service standards. The record also supports the Commission making revisions or clarifications.

In response to Verizon's comments that this rule may impact customers who agree to use digital-only platforms, such as customers of affiliate, Visible, which does not have call-center customer service agents answering phone inquiries, we clarify that the call answer time standard applies to calls, not chats or discussions through any other digital platform.

²⁵¹ The J.D. Power Study is based on feedback from 59,097 customers nationwide, fielded from June through November 2025. It combines J.D. Power's former Wireless Customer Care and Wireless Retail Experience studies and scores carriers across eight dimensions, including value for price paid, ease of doing business, and problem resolution.

²⁵² SBUA, Opening Comments on Staff Proposal, filed September 8, 2026, at 9.

²⁵³ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 34-35.

Additionally, we revise the 30-minute call back requirement to make it consistent with the 24-hour requirement for POTS and fixed interconnected VoIP services established in General Order 133-E.

The Commission also declines to adopt the first prompt requirement. The intent in the Staff Proposal — that the 60-second response time begins from the point when a customer requests to speak with a representative or agent, rather than at the start of the call, and that option to speak with a representative or agent is the first prompt presented to the customer — is to reduce the customer wait times, not force the wireless carriers to spend hundreds of millions of dollars (combined) to rebuild their customers service systems. With this revision, the cost to comply with these rules dramatically decreases, based on estimates provided by Verizon in R.22-03-016.²⁵⁴ We find it reasonable to conclude that the costs to AT&T and T-Mobile, while potentially more, will be similar and within a reasonable range.

Regarding the fine mechanism for failing to meet the customer service standard, in response to comments from AT&T and Verizon, the Commission does not adopt Staff's proposed \$20,000 per day fine. Instead, the Commission adopts for wireless service providers the same fine mechanism that applies to wireline service providers. In doing so, the Commission sets a consistent customer service standard across wired and wireless service, ensuring that wireline and wireless service providers compete from the same baseline of customer service requirements. Consistent with the fine mechanism adopted by GO 133-E, the fine shall be calculated as follows: number of access lines

²⁵⁴ Verizon, Opening Comments on OIR, filed April 1, 2026, Exhibit 2, Declaration of Connie Chaffins. A portion of this cost estimate was filed under seal.

multiplied by ten percent of \$5 and by the number of days noncompliance divided by 365.

Regarding AT&T's commentary on the costs of implementing this proposal, we note the dramatic difference between AT&T's two cost estimates related to complying with the requirement to answer 80 percent of customer calls in 60 seconds. The estimate in AT&T's Opening Comments, filed and served on September 8, 2026, contains a range that is several hundred times more²⁵⁵ than the cost estimate included in the Declaration of Brian Williams,²⁵⁶ despite the earlier declaration being in response to a more onerous standard, answering 80 percent of customer calls within 60 seconds, where the shot clock begins immediately, instead of after the customer requests a live agent.²⁵⁷ Moreover, the cost estimate AT&T provided in its Opening Comments is higher than the estimate T-Mobile provided in its Opening Comments by several orders of magnitude, meaning the two carriers provided dramatically different cost estimates of what it would take to comply with the same standard. AT&T's cost estimate is an extreme outlier and, as such, the Commission treat this estimate as credible and should afford it no weight.

A review of the cost estimates submitted by T-Mobile shows similar credibility issues, as the staffing-related estimate submitted in 2026²⁵⁸ is more than 15 times the cost estimate submitted in 2025 in R.22-03-016 and almost 20

²⁵⁵ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 12. Cites Declaration of Rachel Bilski at 18, 20.

²⁵⁶ AT&T, Opening Comments on OIR, filed April 1, 2026, Attachment 1. The cost estimate was filed under seal.

²⁵⁷ Note to Declaration of Connie Chaffins.

²⁵⁸ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at Attachment C, Declaration of John Consalvo. A portion of this cost estimate was filed under seal.

times more full-time employees.²⁵⁹ Given this large inflation, the Commission deems this estimate as not credible and affords it no weight.

9. Economic Impacts

As part of this proceeding, the Commission also considered compliance costs, both the cost to the carriers, and the potential impact on customer bills.

9.1. Costs to the Carriers

In total, CTIA claims that the annual compliance costs resulting from the proposed rules would be as follows:

- The proposed Cal OES Community Isolation Outage Standard would require \$6.214 billion in annual costs, plus \$16.791 billion in one-time costs;
- The proposed Network Availability by PUMA Standard would require \$6.1 billion in annual costs plus \$16.791 billion in one-time costs; and
- The proposed Customer Service Standard would require \$669.2 million-\$1.1 billion in annual costs, plus \$66.75-\$68.25 million in one-time costs, without fully accounting for all costs.²⁶⁰

This information comes from estimates prepared by AT&T, T-Mobile, and Verizon. Verizon consistently supported its estimates with substantive source documents and workpapers that include explanations of its methodology and calculations. T-Mobile provided some support information, but not nearly to the extent and thoroughness of Verizon's showing. AT&T provided significantly less support for its estimates than T-Mobile.

TURN expresses concern that the estimates provided by the three carriers may be inflated. In particular, TURN notes that the three carriers state that they

²⁵⁹ T-Mobile, Opening Comments on OIR, filed April 1, 2026, Confidential Attachment DIR 1-1, Declaration of John Consalvo. A portion of this cost estimate was filed under seal.

²⁶⁰ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 36-37.

will need to make “drastic network overhauls” (TURN’s words) but do not explain whether other approaches were considered nor why complete or significant overhauls were the chosen options.²⁶¹ TURN also expresses concern that carrier estimates related to complying with the proposed customer service standard are inflated. For example, TURN notes that while AT&T and Verizon would consider using a California-specific queue for customers, T-Mobile’s estimate assumes the company would need to retool its system nationwide to comply.²⁶²

The cost estimates submitted by the carriers and totaled by CTIA are driven by AT&T’s significantly exaggerated cost estimates, as AT&T’s costs greatly exceed the combined cost estimates of the other two carriers. As noted in Section 8.3 of this decision, the cost estimates to comply with the customer service standard are not consistent with previous estimates. To comply with the outage standard, AT&T claims it would need to build a redundant network.²⁶³ AT&T’s claim is hyperbolic and unreasonable. As a result, we do not need to address the credibility of AT&T’s estimate to build a redundant network. As noted in Section 8.2, above, the cost estimates of T-Mobile to comply with the proposed customer service standard also have credibility issues.

In addition to submitting the best documented estimates, Verizon’s estimates are far lower than the other two carriers, and much more consistent with the cost estimates submitted in 2025.

²⁶¹ TURN, Reply Comments on Staff Proposal, filed September 15, 2026, at 37.

²⁶² *Id.*, at 37-38.

²⁶³ AT&T, Opening Comments on Staff Proposal, filed September 8, 2026, at 46.

9.2. Costs to Ratepayers

Among other items, the OIR ordered AT&T, T-Mobile, and Verizon to submit by April 1, 2026, cost estimates regarding the impact of applying General Order 133-E to wireless service on customer bills. Specifically, AT&T, T-Mobile, and Verizon were to provide an estimate of “the price increase on the monthly bill for an average customer of mobile service for a single line as a result of having to implement the customer service standards as described in General Order 133-E, criteria i through iv.”²⁶⁴

AT&T, T-Mobile, and Verizon previously stated that they could not estimate the impact on customer bills.²⁶⁵

When the Staff Proposal was issued, carriers received one final opportunity to estimate ratepayer costs.²⁶⁶

T-Mobile continues to maintain that it cannot estimate the monthly bill impact of complying with the proposed rules.²⁶⁷ T-Mobile adds the following:

...the Staff Proposal asserts that unless compliance costs are passed on directly to customers, any such costs are reasonable. This is not only an economically unsound principle, it does not reflect the reality of a competitive marketplace...

... Staff also seems to confuse the potential ability to incur incremental compliance costs with the reasonableness of the

²⁶⁴ Order Instituting Rulemaking (OIR), at 13.

²⁶⁵ Verizon, Response to OIR, filed April 1, 2026, at 13: “It is not possible or analytically sound for Verizon to specifically quantify a price change resulting from the increased cost complying with a new or expanded regulation.” T-Mobile, Response to OIR, filed April 1, 2026, at 11-12: “T-Mobile is unable to currently estimate what, if any, additional regulatory compliance costs would be passed on to the subscribers, and if so what subscribers.” AT&T, Response to OIR, filed April 1, 2026, at 35: “AT&T has not evaluated how the additional expense represented by implementation of the 80/60 standard (answering 80 percent of calls within 60 second) would affect AT&T customers bills, if at all...” AT&T did not address total pass-through costs.

²⁶⁶ Administrative Law Judge Ruling Issuing Staff Proposal, issued August 19, 2026, at 2.

²⁶⁷ T-Mobile, Opening Comments on Staff Proposal, filed September 8, 2026, at 40.

proposed regulation. Such a standard, however, has no limiting principle especially when dealing with the type of nationwide providers in this docket. Again, it is just another way to assert that any regulation is reasonable. That is not, and cannot, be the appropriate standard.²⁶⁸

AT&T submitted a customer bill impact estimate, but that estimate is based on the exaggerated cost estimates AT&T submitted, discussed above, and therefore, is not credible.

In its opening comments, Verizon provided an estimate of customer bill impact that totaled the costs of complying with all proposed rules, divided by its California customers.²⁶⁹ That estimate includes costs that will not be incurred because the Commission either is not adopting certain proposals, such as the proposed outage repair standard, or instead is revising those proposed rules. For example, Verizon's estimate to comply with the outage repair standard is a substantial percentage of its total cost estimate. That standard is not adopted by this decision. Moreover, the other two largest expenses are for proposed rules the Commission is not adopting here: the first prompt rule and the 30-minute call back requirement.

Finally, as noted by TURN, it appears that carriers did not deduct projected customer fees — such as the \$5 “convenience fee” that AT&T charges wireless customers who make payments with the assistance of a customer service

²⁶⁸ *Id.*, at 36-37.

²⁶⁹ Verizon, Opening Comments on Staff Proposal, filed September 8, 2026, at Exhibit 2. Exhibit 2 was filed under seal.

representative — from their estimates of “average monthly bill” increases for California customers.²⁷⁰

10. Industry Legal Claims

CTIA and other industry parties raised several issues discussed below.

10.1. Evidentiary Support

CTIA claims that the Staff Proposal violates California law because it lacks evidentiary support, which CTIA opines is impermissible under Pub. Util. Code Section 1757.1. CTIA also states that the Staff Proposal relies on uncorroborated hearsay.²⁷¹

The fact that some carriers did not provide certain information in the time they were ordered to provide that information is documented elsewhere in this decision.

This decision contains the necessary record support for the provisions adopted, which includes significant modifications to what Staff proposed.

²⁷⁰ TURN, Reply Comments on Staff Proposal, filed September 15, 2026, at 38-39. TURN cites to AT&T Opening Comments, Attachment A, at 3; T-Mobile Opening Comments at 40-41; Verizon Opening Comments at 42.

²⁷¹ CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 28. At footnote 76, CTIA also includes the following citation: *Applied Med. Res. Corp. v. Pub. Utils. Comm’n*, 2026 WL 2240646, at *10 (Cal. Ct. App. Aug. 4, 2026). AT footnote 77, CTIA cites to:

Util. Reform Network v. Pub. Utils. Comm’n, 223 Cal.App.4th 945, 949, 962 (2014) (“[U]nder California statutory and decisional law, as well as the Commission’s own decisions, uncorroborated hearsay cannot constitute substantial evidence to support an agency’s decision absent specific statutory authorization.”) (citing, *inter alia*, *Daniels v. Dep’t of Motor Vehicles*, 33 Cal.3d 532, 536–37 (1983)); *see also id.* at 962 n.10 (“[T]he Commission’s own rulings preclude reliance on uncorroborated hearsay to support a finding of fact.”); *see also People v. Yates*, 25 Cal.App.5th 474, 482 (2018) (“Hearsay, defined as an out-of-court statement by someone other than the testifying witness offered to prove the truth of the matter stated, is generally inadmissible unless it falls under an exception.”) (citing Cal. Evid. Code § 1200(a), (b)); *see also In re Clear World Commc’ns Corp.*, D.05-06-033 (“While such hearsay testimony is admissible in our administrative hearings, it cannot without corroboration be the basis of a finding that slamming occurred.”) (citing *Cleancraft v. San Diego Gas & Elec.*, D.83-06-092).

10.2. Economic Impact

CTIA claims that the Staff Proposal's "proposed rules (both network- and customer service-related) independently violate California law because they fail to adequately assess the significant economic consequences they would have for wireless providers and customers" ignore both that a Staff Proposal is not a Commission decision, as well as carrier delays in providing complete cost data and other data until much later in the proceeding. Despite that, the Commission, in Section 9 of this decision and elsewhere, considers both the cost on carriers and the potential impact on customer bills.

CTIA also complains that Staff acknowledge that the carriers submitted some cost data yet dismissed it "based on the unfounded assertion that the evidence was 'vague and unverifiable.'" CTIA disputes Staff's categorization. Further, CTIA writes that Staff:

...errs in discounting substantial compliance costs based on the flawed theory that such costs are cognizable — and should be given weight — only to the extent they are passed on to customers. The Staff Proposal cites no authority for this proposition, and CTIA is aware of none. Regulatory compliance costs that are borne by companies subject to Commission regulation must be considered as part of any 'economic effects' analysis under Section 321.1(b) just as pass-through costs borne by consumers must be considered.²⁷²

As a preliminary matter, the Commission has consistently rejected arguments that Section 321.1(b) requires "a cost-benefit analysis or consideration of utility-specific economic impacts."²⁷³ Rather, the statute requires *the Commission* — not Staff — to "take all necessary and appropriate actions to assess

²⁷² CTIA, Opening Comments on Staff Proposal, filed September 8, 2026, at 28.

²⁷³ D.05-05-016, at 6.

the economic effects of its decisions.” The Commission has done so in this Decision. Moreover, CTIA’s argument here contradicts CTIA’s statement that the Staff Proposal did not consider economic impact. CTIA may not agree with the Staff Proposal’s discussion on economic impact, but that does mean Staff did not conduct the analysis. Further, CTIA’s insistence that all information submitted by the three wireless carriers is credible itself lacks credibility. As noted in Section 9 of this decision, CTIA simply totaled the cost data submitted by the three carriers. There is no indication that CTIA performed any additional review or analysis; CTIA did not compare costs nor did it discuss carriers’ inflated costs.

Finally, as noted above, this decision adopts customer service standards consistent with General Order 133-E with some modifications, rather than the customer service standards set out in the Staff Proposal, in part due to the cost estimates provided by Verizon.

A more detailed discussion on economic impact is contained in Section 9 of this decision.

11. Conclusion

The Commission adopts General Order 133-F, as contained in Appendix A. The portions of General Order 133-F that apply to wireless service shall be implemented on January 1, 2028. The implementation date for the portions of the General Order that apply to wireline (POTS and VoIP) is unchanged.

12. Summary of Public Comment

Rule 1.18 of the Commission’s Rules of Practice and Procedure (Rules) allows any member of the public to submit written comment in any Commission proceeding using the “Public Comment” tab of the online Docket Card for that proceeding on the Commission’s website. Rule 1.18(a) requires that all written public comment submitted prior to the submission of the proceeding are part of

the administrative record of the proceeding. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding.

The Commission received 1,485 public comments on the Docket Card. Over 80 percent of comments were complaints about the service of a particular wireless carrier (AT&T, T-Mobile or Verizon), or otherwise supportive of the Commission adopting service quality rules for wireless carriers. Less than twenty percent of the comments asked the Commission to consider rate impacts when choosing to adopt service quality rules for wireless carriers.

13. Procedural Matters

This decision affirms all rulings made by the Administrative Law Judge and assigned Commissioner in this proceeding. All motions not ruled on are deemed denied.

We note that parties filed several motions to file under seal. On September 2, 2026, the assigned ALJ issued a protective order for all confidential material filed in this proceeding. The issuance of the protective order renders the motions to file under seal moot.

14. Comments on Proposed Decision

The proposed decision of Commissioner Darcie L Houck in this matter was mailed to the parties in accordance with Pub. Util. Code Section 311 and comments were allowed under Rule 14.3. Comments were filed on _____, by _____ and reply comments were filed on _____, by _____.

15. Assignment of Proceeding

Darcie L. Houck is the assigned Commissioner and Thomas J. Glegola is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. The Commission opened this proceeding to consider revisions to GO 133-E applicable to wireless carriers that operate in California.
2. The Commission's Communications Division issued a Staff Proposal delineating proposed changes to GO 133-E.
3. General Order 133-E requires that POTS and interconnected VoIP service providers restore outages within 24 hours.
4. Californians rely on their wireless devices to receive emergency notifications, contact family and friends, and reach first responders during emergencies.
5. The number of wireless voice service outages is excessively high, as are the service restoration periods.
6. In 2021, wireless carriers reported to Cal OES 3,315 community isolation events. In 2022, wireless carriers reported 3,319 community isolation events. From 2023 through 2025, there were more than 17,000 wireless community outages reported to Cal OES, with annual outage totals between 5,600 and 6,000 occurrences.²⁷⁴ In 2023, 576 outages exceeded 24 hours. In 2024, 401 outages exceeded 24 hours. In 2025, 372 outages exceeded 24 hours.
7. One of the three facilities-based wireless carriers consistently reports dramatically more Cal OES outages than the other two.
8. Overall, the experiences of Californians, customers of the various carriers, corroborate the hard data and other information in the record.
9. At least some of the reported outages are the result of circumstances beyond a carrier's control.

²⁷⁴ Staff Proposal, at 19.

10. Certain perceived outages may be the result of a lack of adequate coverage or network congestion, not a complete loss of service.

11. Carriers presented their performance using the network uptime on a statewide basis.

12. Statewide geographic spans mask more localized outages.

13. PUMAs are non-overlapping standardized census areas designed for demographic analysis and contain no fewer than 100,000 residents each PUMAs are used to tabulate and disseminate decennial census and American Community Survey (ACS) and Public Use Microdata Sample (PUMS) data. California currently contains 281 PUMAs based on decennial 2020 data with an average population of 140,705.

14. The Commission adopted PUMA analysis as part of its Affordability Proceeding (R.18-07-006).

15. Wireless coverage maps on the websites of AT&T, T-Mobile, and Verizon, as well as those on the FCC's website depict outdoor coverage.

16. The three facilities-based wireless carriers possess the modeling capabilities required to produce accurate, high-granularity maps that depict indoor coverage.

17. Complaints about the accuracy of the mapping of wireless coverage are well-known and often repeated, including numerous findings by this Commission.

18. The cost for carriers to implement the indoor mapping requirement is, if anything, minimal.

19. General Order 133-E contains the following customer service requirements for telephone corporations with 5,000 or more access lines providing POTS and fixed interconnected VoIP service providers:

- (a) Maintain a local, toll-free or collect call telephone access line which will be available to its subscribers 24 hours a day, seven days a week: At minimum, trained company representatives will be available to respond to customer telephone inquiries during normal business hours (Monday to Friday between 8am and 5pm Pacific Standard Time). After normal business hours, a call may be answered by a service or an automated response system, including an answering machine. Inquiries received after normal business hours must be responded to by a trained company representative on the next business day.
- (b) A customer representative must answer 80 percent of the customer service calls within 60 seconds. Telephone corporations may offer a callback service. If customers choose to use this callback service, and a customer service representative responds to the customer service call within 24 hours, then this call will not count against meeting this criterion.
- (c) Provide a postal mail component for customer service inquiries. The postal mail contact must be provided on the company's website, via customer service telephone line, and bill inserts.
- (d) Resolve billing-related inquiries within 90 days from the initial customer inquiry.
- (e) All outage-related inquiries must be directed towards the appropriate wireless standards.

20. A review of the average answer times for AT&T, T-Mobile, and Verizon supports the need for firm requirements.

21. The record contains two wireless customer satisfaction surveys, one that indicates poor performance and one that indicates average performance.

22. The estimate of compliance costs for the proposed customer service standard submitted by AT&T is inflated and not credible.

23. The estimate of compliance costs for the proposed customer service standard submitted by T-Mobile is inflated and not credible.

24. The estimate of compliance costs for the proposed customer service standard submitted by Verizon is supported.

25. The cost to comply with the revised and adopted customer service standard is reasonable.

Conclusions of Law

1. The public interest requires that telephone corporations furnish safe and reliable service.

2. The public interest requires that telephone corporations adhere to the service quality standards in GO 133-E, and that the Commission adopt the penalty mechanism to ensure that the telephone corporations comply.

3. The Commission has jurisdiction over facilities-based wireless providers, and authority to ensure the reliability of communications networks.

4. The Commission has jurisdiction over wireless telephone corporations and other communications utilities.

5. Pub. Util. Code Section 216 gives the Commission broad jurisdiction over public utilities, including telephone corporations as defined by Pub. Util. Code Section 234.

6. The Commission's "broad regulatory power over public utilities" derives from Article XII of the State Constitution, which establishes the Commission, and gives it wide-ranging regulatory authority, including but not limited to "the power to ... establish rules, hold various types of hearings, award reparation, and establish its own procedures."

7. Pub. Util. Code Section 216 definition of a “public utility” includes every “telephone corporation” where service is performed, or a commodity is delivered to the public or any portion thereof.

8. Pub. Util. Code Section 234 definition of a “telephone corporation” includes “every corporation or person owning, controlling, operating, or managing any telephone line for compensation in this state.”

9. Pub. Util. Code Section 233 definition of a “telephone line” includes “all conduits, ducts, poles, wires, cables, instruments, and appliances, and all other real estate, fixtures, and personal property owned, or controlled, operated, or managed in connection with or to facilitate communication by telephone, whether such communication is had with or without the use of transmission wires.”

10. California’s Constitution, Art. XII, Section 3, specifically extends the Commission’s jurisdiction to companies engaged in “the transmission of telephone and telegraph messages.”

11. The Commission’s authority over public utilities includes oversight over both public utility services and facilities pursuant to California Constitution, Art. XII Sections 1-6 and Pub. Util. Code Section 701.

12. Pub. Util. Code Section 451 requires the Commission to ensure that utilities, including telephone corporations, “furnish and maintain such adequate, efficient, just and reasonable service, instrumentalities, equipment, and *facilities* ... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.” [emphasis added]

13. Pub. Util. Code Section 761 requires the Commission to ensure the reasonableness and sufficiency of *utility facilities*²⁷⁵ and may order “additions, extensions, repairs, or improvements to, or changes in” utility facilities that the Commission finds “ought reasonably to be made.” [emphasis added]

14. Pub. Util. Code Sections 233, 224.4 extends the Commission’s jurisdiction to the facilities wireless carriers rely upon to provision service.

15. The Federal Communications Act does not preempt the Commission from exercising public safety regulation of wireless facilities.

16. The 1993 amendments to the Federal Communications Act ushered in an era of shared jurisdiction.

17. In 1993, Congress passed the Omnibus Budget Reconciliation Act of 1993 (Budget Act), which amended Section 332(c)(3)(A) of the Communications Act as follows: no State or local government shall have any authority to regulate the entries of or the rates charged by any commercial mobile service or any private mobile service, except this paragraph *shall not prohibit a State from regulating the other terms and conditions of commercial mobile service*. [emphasis added]

18. After Congress enacted the revised 47 U.S. Code Section 332, the Commission issued multiple decisions implementing the change in federal law and harmonizing those changes with existing Commission oversight of wireless telephony.

19. The Commission continues to exercise broad authority over wireless service.

20. In providing a role for states, Congress explicitly declined to occupy the field.

²⁷⁵ Pub. Util. Code § 761.

21. Congress did not expressly or otherwise preempt state health and safety rules.

22. The scope of 47 U.S. Code Section 332's preemptive language is limited to regulations that *directly and explicitly* control rates, prevent market entry, or require a determination of the reasonableness of rates.

23. The Commission retains the unequivocal authority to regulate "other terms and conditions of service."

24. The proposed penalty mechanism in GO 133-E is consistent with statute and the Commission's standards for imposing penalties set forth in D.98-12-075 because it is based on the size of the carrier and duration of the violations.

25. The Commission should adopt reporting and monitoring requirements to track wireless outages and network availability, instead of imposing performance penalties.

26. The Commission is not abusing its discretion by applying any or all rules concerning customer service contained in General Order 133-E to wireless carriers.

27. The Commission should adopt the Customer Service Standard for facilities-based wireless carriers in General Order 133-F.

28. General Order 133-D required wireless telephone corporations to provide coverage maps on their websites and at retail locations and disclose equipment limitations so a customer understands what they "generally may expect" to receive adequate signal strength to place and receive calls when outdoors.

29. In adopting D.25-09-031, the Commission chose to remove the wireless mapping requirement in General Order 133-D, and to not adopt a proposal from Staff to require wireless carriers to provide maps showing address level coverage. The Commission took this action because wireless carriers said that

could not meet the proposed granularity requirements of providing maps due to technological limitations.

30. The Commission should require the facilities-based wireless carriers to post maps on their websites depicting indoor coverage.

31. The Communications Division Staff should continue to review and analyze carriers' service quality results and performance for the benefit of California consumers and to bring forward recommendations and proposals to this Commission.

32. General Order 133 already provides Staff authority to prepare and update reporting templates that carriers must use.

O R D E R

IT IS ORDERED that:

1. General Order 133-F, as contained in Appendix A of this decision, is adopted and effective January 1, 2028.

2. Starting in 2028, on January 31 of each year, each facilities-based wireless service provider shall submit to the California Public Utilities Commission's Communications Division the underlying shapefiles used to display the propagation maps each carrier maintains on its website.

3. Rulemaking 26-02-017 is closed.

This order is effective today.

Dated _____, at Sacramento, California.

APPENDIX A