

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Consumer Programs Branch
and Carrier Oversight Branch**

**RESOLUTION T-17388
February 28, 2013**

RESOLUTION

RESOLUTION T-17388. This Resolution ratifies the Communications Division's approval of Virgin Mobile, USA's, L.P. (U-4327-C), doing business as Assurance Wireless, request to offer new wireless federal Lifeline service plans to eligible customers in California - Advice Letter Nos. 3A and 3B, filed October 2, 2012, and October 26, 2012, respectively.

SUMMARY

By this Resolution, the California Public Utilities Commission (Commission) ratifies the Communications Division's (CD) approval of Virgin Mobile, USA's (Virgin), L.P. (U-4327-C), doing business as (dba) Assurance Wireless (AW) request to offer new wireless federal Lifeline service plans to eligible customers in California. We find that the request is consistent with the applicable law and in the public interest. Therefore, we ratify CD's December 5, 2012 approval of Virgin's Advice Letter Nos. (AL) 3A and 3B.

BACKGROUND

Virgin is a facilities-based wireless service provider. It is a Delaware-based company with principal offices at 10 Independence Blvd., Warren, New Jersey. On April 16, 2002, the Commission issued a wireless registration number U-4327-C and authorized Virgin to operate as a reseller of Commercial Mobile Radio Services (CMRS) to the public in California.

On April 29, 2009, Virgin filed Tier III Advice Letter (AL) 1, requesting a limited Eligible Telecommunications Carrier (ETC) status in order to provide federal Lifeline services to qualifying consumers in California. On May 5, 2011, in Resolution T-17284, the Commission granted Virgin an ETC status and authorized Virgin to provide wireless federal Lifeline services to eligible consumers, excluding the service areas of the Small

Local Exchange carriers. Virgin did not request authority to offer California LifeLine services or to receive a subsidy from the California LifeLine fund.

In AL 1 and the supplements filed thereto (ALs 1A, 1B, 1C and 1D), Virgin proposed several federal Lifeline rate plans. In Resolution T-17284, the Commission approved Virgin's \$20.00 plan, with a modification, and rejected the other proposed Lifeline plans.¹ Virgin's \$20 plan originally included 250 anytime minutes with the purchase of 750 minutes. It also included 1,000 text messages. The Commission rejected the 250-free-minute component of the \$20 plan and ordered that the plan include 1,000 anytime minutes with 1,000 text messages, with no free minutes.

SUBJECT OF ADVICE LETTERS 3A AND 3B

On August 20, 2012, Virgin filed Information Only (AL 3)² notifying the Commission of its plans to offer three new wireless federal Lifeline plans, in addition to the \$20 Plan³ that was approved in Resolution T-17284. The three new plans are as follows:

- Free Plan: 250 voice minutes and 250 domestic messages (text, IM and/or e-mails) each month at no cost to the customer;
- \$5 Plan: 500 voice minutes (250 free plus 250 additional voice minutes) and 500 domestic messages (250 free plus 250 additional messages) each month; and
- \$30 Unlimited Plan: unlimited voice minutes, unlimited domestic messages and unlimited access to Virgin XL downloads (ringtones, wallpaper, etc.) and the mobile Internet.

In Informational Only AL 3, (AW) states that it also plans to provide a "free" wireless handset to eligible customers and that its new Lifeline plans require no service contracts or early termination fees. The new plans also include Caller ID, Call Waiting,

¹ On June 10, 2011, Virgin filed an Application for Rehearing of Resolution T-17284 (A.11-06-012). Virgin seeks rehearing and permission to offer federal Lifeline services in California that include basic 250 free anytime minutes plan and standard 500 minutes for \$5 and 1,000 minutes/1,000 texts for \$20 plans that automatically include 250 free anytime minutes as a component of service. The rehearing application is currently pending and the issuance of this resolution is not intended to dispose of or prejudice the issues in that rehearing application.

² In its Information Only AL 3, Virgin states that "Resolution T-17284 does not require Assurance Wireless to file an advice letter or tariffs when changing its Lifeline rates or introducing new Lifeline plans." However, it also states that "consistent with Resolution T-17284, Assurance Wireless is filing this Information Only Advice Letter to apprise the Commission of its new Lifeline plans described herein"; Virgin's AL3 at fn.9; dated August 17, 2012.

³ The \$20 plan provides customers with 1,000 total voice minutes each month and 1,000 domestic messages.

nationwide (domestic) long distance, and voicemail, in addition to local calling at no additional charges. Customers may also purchase additional voice minutes and domestic messages on an *a la carte* basis for 10 cents each, by using either a Virgin “Top Up” card (available at retail locations), a debit card, credit card, or Pay Pal.

Additionally, customers may upgrade their plan at anytime from the Free Plan to the \$5 Plan, the \$20 Plan or the \$30 Unlimited Plan. Customers may also default to the Free Plan at anytime and that there will be no charge for changing from one service plan to another.

Pursuant to GO 96-B, on September 28, 2012, CD staff informed Virgin that Information Only AL 3 should be re-filed as a Tier II AL. On October 2, 2012, Virgin re-filed the AL.⁴

In its re-filing (AL 3A), Virgin added a new \$20 Plan,⁵ in addition to the three new plans included in AL 3. The new \$20 Plan includes 1000 total voice minutes (250 free plus 750 additional voice minutes and 1,000 total domestic messages each month) with an option to default to the new Free Plan.⁶ Virgin clarifies that the option to default to the new Free Plan also applies to the new \$5 Plan and the new \$30 Unlimited Plan.

On October 26, 2012, Virgin filed a supplement to AL 3A and provided more information about the new rate plans. The supplement (AL 3B) includes the following information:

- Additional purchased minutes expire at the end of the customer’s service month. Customers have the option of purchasing minutes/messages in bulk or to purchase additional minutes/messages on an *a la carte* basis through decrements to their cash balance. Any unused additional minutes/messages expire at the end of the customer’s service month. They do not rollover to the following service month;
- The \$30 Unlimited Plan is offered on a monthly basis and will automatically renew for another month if the customer has at least \$30 in his/her cash account. If the customer’s cash balance at the end of the month is \$0, the customer would default to the new Free Plan and has the option to add the \$5 Plan, \$20 Plan, or \$30 Plan to his/her account at anytime during the service month;

⁴ In Resolution T-17339, the Commission also held that “Telscape wireless and other existing wireless ETC in California shall be required to file a Tier II Advice Letter to obtain approval of any changes to its approved wireless federal Lifeline offerings included in its respective Resolutions that granted its ETC designation”; OP 3; dated October 6, 2011.

⁵ With approval of the New \$20 plan, Assurance Wireless states it will withdraw the old \$20 Plan and its Application for Rehearing of Resolution T-17284; AL 3A at p. 2.

⁶ AL No. 3B at fn. 9.

- There are no activation fees and no non-recurring charges. Minutes/messages above the free minute/message allowances are sold and provided to the customer on a cash basis through funds placed in or credited to the cash balance of the customer's account;
- All Virgin handsets operate with AW's federal Lifeline services except for iPhone, Android and Blackberry handsets and two older model Virgin handsets (Party Animal and Super Model handsets);
- If a customer purchases an AW phone for \$20 and is subsequently found eligible for federal Lifeline service, AW will credit the customer's cash account in the amount of \$20;
- AW will only submit Lifeline eligibility applications to the California LifeLine Administrator if the customer has activated an AW compatible handset on his/her account. AW states it will inform customers accordingly. Customers will be charged the "regular" usage rates (AW's *a la carte* rate of \$0.10 per minute or message) until their Lifeline eligibility application is approved. The regular usage rates will apply after the customer has used up an introductory, complimentary allowance of 10 free minutes that are available after activation of the handset. Customers may select the new Free Plan, the new \$5 Plan, the new \$20 Plan, or the \$30 Unlimited Plan after they are approved for Lifeline eligibility;
- AW will provide information concerning rates, terms, and conditions to customers through the terms of service provided with the handset and on its websites. Customers may also make a free call to AW's customer care for information about rates, terms, and conditions of service and how to use AW's service plans at anytime.
- AW will submit its marketing materials for review and approval by CD prior to publication.

In summary, based on AL 3A and 3B, Virgin proposes the following new wireless federal Lifeline plans:

(1) Free Plan:

- 250 anytime voice minutes/messages for free per month;
- Includes Caller I.D., Call Waiting, nationwide (domestic) long distance, voice mail and local calling at no additional charge;
- No rollover of unused minutes/messages;

- No activation charge or early termination fee;
- Each additional minute/message at \$0.10 per minute/message;
- A free handset to Lifeline eligible customers, and
- Ability to change to \$5 Plan, \$20 Plan, or \$30 Unlimited Plan at anytime.

(2) \$5 Plan:

- 500 anytime voice minutes/messages for \$5.00 per month (250 free plus 250 additional voice minutes and 250 free plus 250 additional messages);
- Includes Caller I.D., Call Waiting, nationwide (domestic) long distance, voice mail and local calling at no additional charge;
- No rollover of unused minutes/messages;
- No activation charge or early termination fee;
- Each additional minute/message at \$0.10 per minute/message;
- A free handset to Lifeline eligible customers; and
- Ability to change to Free Plan, \$20 Plan, or \$30 Unlimited Plan at any time.

(3) \$20 Plan:

- 1,000 anytime voice minutes/messages for \$20.00 per month (250 minutes for free with the purchase of 750 minutes for \$20.00) per month,
- Includes Caller I.D., Call Waiting, nationwide (domestic) long distance, voice mail and local calling at no additional charge;
- No rollover of unused minutes/messages;
- No activation charge or early termination fee;
- Each additional minute/message at \$0.10 per minute/message;
- A free handset to Lifeline eligible customers; and
- Ability to change to Free Plan, \$5 Plan, or \$30 Unlimited Plan at any time.

(4) \$30 Unlimited Plan:

- Unlimited anytime voice minutes/messages for \$30.00 per month;
- Includes Caller I.D., Call Waiting, nationwide (domestic) long distance, voice mail and local calling at no additional charge;
- Includes unlimited access to Virgin XL downloads (ringtones, wallpaper, etc.) and the mobile Internet;
- No rollover of unused minutes/messages;
- No activation charge or early termination fee;
- A free handset to LifeLine eligible customers; and
- Ability to change to Free Plan, \$5 Plan, or \$20 Plan at any time.

On October 29, 2012, CD suspended Virgin's ALs 3A and 3B for further review.

DISCUSSION

I. Virgin's New Rate Plans Comply with the FCC and the Commission's Lifeline Rules.

CD recommends that the Commission find Virgin's four new Lifeline plans to be in compliance with the Federal Communications Commission (FCC) and the Commission's Lifeline rules. In the *Lifeline Reform Order*, the FCC addressed the issue of a minimum consumer charge for federal Lifeline services. It concluded that imposing a minimum charge could impose a significant burden on some classes of Lifeline consumers.⁷ A minimum charge could potentially discourage consumers from enrolling in the program and could result in current Lifeline subscribers leaving the program.⁸ The FCC found that there is insufficient data to establish that requiring a minimum charge would effectively protect the program from waste, fraud, and abuse without thwarting the FCC's goal of making vital communications services available to low-income consumers.⁹ The FCC also concluded that in light of the other significant steps it is taking to reform the Lifeline program and prevent waste, fraud and abuse, it declined to adopt a minimum consumer charge requirement for federal Lifeline service.¹⁰ Therefore, the Free Plan and the free minutes included in Virgin's \$5 plan and \$20 plan are consistent with the federal Lifeline rules.

In D.10-11-033, the Commission adopted price floors for California LifeLine services in order to ensure an orderly phase-in of the Specific Support Amounts (SSA) available to carriers through December, 31, 2012. The Commission set the price floor at \$5.00 and capped the LifeLine rate for Basic Residential service at \$6.84. The LifeLine rate for Measured Rate service was capped at \$3.66 with a price floor of \$2.50. The Commission required carriers to charge California LifeLine customers at least \$5.00 or \$2.50 depending on the type of service, either Flat or Measured.

In Ordering Paragraph (OP) 14 of D.10-11-033, the Commission held that "Beginning January 1, 2013, the Commission will limit California LifeLine Program support paid to carriers to the lesser of the Specific Support Amount or the amount that results in the California LifeLine subscriber having a \$5.00 monthly rate. A similar limitation applies to subscribers of regular Measured Rate service (1MR) such that the support paid to

⁷ *Lifeline Reform Order* at para. 266.

⁸ *Id.*

⁹ *Id.*

¹⁰ The FCC's order does not preclude states from requiring state-designated ETC's to assess and collect a minimum charge from Lifeline subscribers and amended 47 CFR Part 54. 47 CFR 54.416(c) reads "States that mandate Lifeline support may impose additional standards on ETCs operating in their states to ensure compliance with state Lifeline programs."

carriers is the lesser of the Specific Support Amount or the amount that results in the California LifeLine subscriber having a \$2.50 monthly rate.”¹¹

Carriers are no longer required to have minimum price floors for California LifeLine services. Beginning January 1, 2013, the price floors will only apply in calculating SSA reimbursements for carriers that provide California LifeLine services to qualifying customers. In conformance with D.10-11-033, on November 30, 2012, CD issued an administrative letter to carriers reminding them that price floors established in D.10-11-033 on LifeLine services will no longer apply for pricing purposes, and that the \$5.00/\$2.50 price floor amounts will be used only for the purposes of calculating the SSA amounts.

Virgin does not and is not authorized to offer California LifeLine. It offers wireless federal Lifeline services and only receives federal Lifeline support for those services. However, when determining ETC status for wireless carriers’ requests for the purpose of offering Federal Lifeline and Link Up services in California, the Commission applies the pricing rules adopted in D.10-11-0333. Staff evaluates the proposed Lifeline rate plans filed via Advice Letter against the adopted \$2.50 price floor and \$3.66 ceiling for California LifeLine Measured Rate service. In Resolution T-17284, staff concluded that the Free Plan and the free minute component of the \$20 plan were not in compliance with the Commission’s LifeLine pricing policies. The Commission concurred by denying Virgin authorization to offer those plans. However, consistent with our policy to remove the price floors for California LifeLine services beginning January 1, 2013, we will not impose minimum price floors for wireless federal Lifeline service plans.

Virgin’s new \$5, \$20 and \$30 rate plans are reasonable and in the public interest. Virgin’s federal Lifeline plans offer the low income consumer more minutes/messages for less money than Virgin’s retail payLo Talk & Text Plans¹² (payLo). The \$20/month payLo Plan offers customers 400 minutes and charges \$0.15/message whereas the \$5 federal Lifeline plan offers 500 voice minutes and 500 messages with additional minutes/messages at \$0.10 each and the \$20/month federal Lifeline plan provides 1000 minutes and 1000 text messages per month. The \$30/month payLo Plan offers customers 1500 minutes and 1500 messages whereas for \$30 per month the federal Lifeline customer receives unlimited minutes and messages. Virgin’s retail non-Lifeline customers must pay \$40/month to receive unlimited minutes and text messages. In addition to the lower rates, federal Lifeline consumers also receive free phones with no activation charges. Virgin’s new federal LifeLine plans are reasonable and should be approved.

¹¹ D.10-11-033 at OP 14; See also GO 153, sections 8.14. and 8.1.5.

¹² <http://www.virginmobileusa.com/cell-phone-plans/>.

II. Safety Considerations

CD finds that there are two safety considerations inherent with any Lifeline wireless services: 1) The removal of the handset from the home; and 2) poor mobile reception resulting from weather conditions, terrain, or gaps in service coverage. In Resolution T-17284, we noted these concerns and in OP 11 of that Resolution, we required Virgin to “include adequate information about the potential coverage and service quality issues and provide copies of marketing materials, prior to publication, to CD staff for review.” We remind Virgin to continue to address these safety concerns on its websites and in any of its marketing and informational materials that it provides to potential and existing wireless federal Lifeline customers. Virgin should also provide any marketing materials that it intends to use in California for review and approval by CD prior to publication.

III. Cricket’s Protest

On October 22, 2012, Cricket Communications, Inc. (U- 3076 C) (Cricket) filed a Protest to Virgin’s AL 3A asserting that it was improperly filed as a Tier II AL. Cricket states that it has no position on the merits of the AL, but asserts that, at a minimum, the free rate plan proposed by Virgin in AL 3A requires an approval by the full Commission because it was rejected by the Commission in Resolution T-17284.¹³

In addition, Cricket states that the Lifeline plans rejected in Resolution T-17284 are the subject of a pending application for rehearing (Application (A.) 11-06-012). Cricket asserts that the rate plans proposed in AL 3 should not go into effect without a Commission decision modifying its prior decision in Resolution T-17284, or an action addressing AW’s pending application for rehearing.¹⁴ The Commission determined not to allow Virgin to provide the free minute plans in Resolution T-17284 because they did not comply with the Commission’s LifeLine pricing rules. We are no longer bound by those pricing rules because they expired on December 31, 2012 as explained above in Discussion, Section I. We here find Virgin’s new Lifeline plans, which include free minutes, to be in compliance with the Commission’s LifeLine pricing rules. Therefore, Cricket’s Protest is moot.

IV. Summary of CD Recommendations

CD recommends approval of all four of Virgin’s new wireless federal Lifeline plans and authorizing Virgin to offer them to eligible customers in California, excluding the service areas of the Small LECs as follows:

¹³ Cricket Protest at pp.1-3; dated October 22, 2012.

¹⁴ *Id.*

- Free Plan: 250 voice minutes and 250 domestic messages each month at no cost to the customer;
- \$5 Plan: 500 total voice minutes (250 free plus 250 additional minutes) and 500 domestic messages (250 free plus 250 additional messages) each month for \$5.00 a month;
- \$20 Plan: 1,000 voice minutes (250 free plus 750 additional minutes) and 1,000 domestic messages (250 free plus 750 additional messages) each month for \$20.00 a month;
- \$30 Unlimited Plan: unlimited voice minutes, unlimited domestic messages and unlimited access to Virgin XL downloads (ringtones, wallpaper, etc.) and the mobile Internet for \$30;

In addition, Virgin shall continue to comply with GO 153's verification and certification processes and shall not provide federal Lifeline pricing to customers until their Lifeline eligibility is approved by the Commission's LifeLine Administrator.

Virgin shall also continue to clearly label its Lifeline offerings as federal Lifeline to minimize customer confusion between state and federal Lifeline programs. Virgin shall also provide adequate information to its customers about the potential coverage, service quality and safety issues between federal wireless and state wireline Lifeline plans. And, prior to publication, Virgin shall provide to CD staff copies of marketing and informational materials for review and approval.

NOTICE

In compliance with GO 96-B, Virgin's ALs 3A and 3B were posted on the Commission Daily Calendar on October 12, 2012, and November 16, 2012, respectively. The suspension of ALs 3A and 3B was calendared on October 29, 2012.

COMMENTS

Public Utilities Code Section 311(g)(1) requires the Commission to serve copy of draft Resolution on all parties, and make the draft Resolution available for public review and comment for a period of 30 days or more, prior to a vote of the Commission on the Resolution. On January 29, 2013, the Commission served a copy of this Resolution for comments to all persons on the attached Service List.

No opening or reply public comments were submitted on this Resolution.

FINDINGS AND CONCLUSIONS

1. Resolution T-17284 (dated May 5, 2011) designated Virgin as an Eligible Telecommunications Carrier (ETC) and authorized Virgin to provide wireless federal Lifeline services in California excluding the service areas of the Small Local Exchange Carriers.
2. On August 20, 2012, Virgin USA, L.P., dba as Assurance Wireless (U-4327-C), filed Advice Letter (AL) 3 as an Information Only Advice Letter notifying the Commission of its intent to offer new wireless federal Lifeline plans to eligible consumers in California.
3. Pursuant to GO 96-B, the Communications Division requested Virgin to re-file AL 3 as a Tier II AL.
4. On October 2, 2012, Virgin filed AL 3A under Tier II, which is a re-filing of Information Only AL 3.
5. On October 26, 2012, Virgin filed AL 3B, a supplement to AL 3A, adding a new \$20 Plan and providing more information about its new federal Lifeline service offerings.
6. On October 22, 2012, Cricket Communications, Inc. (U 3076 -C) filed a Protest to Virgin's AL 3A.
7. Cricket's Protest asserts that approval of Virgin's new Free Plan and the \$5 Plan require approval of the full Commission because the Commission rejected free plans in Resolution T-17284.
8. Cricket's Protest is moot because we find Virgin's new rate plans to be in compliance with Commission's current LifeLine pricing rules.
9. On October 29, 2012, CD suspended Virgin's ALs 3A for further review.
10. On December 5, 2012, Virgin filed AL 3B, a supplement to AL 3A.
11. Virgin does not receive any subsidy from the California LifeLine Fund.
12. Virgin's Free Plan, \$5 Plan, \$20 Plan and \$30 Unlimited Plan are consistent with the applicable law and in the public interest and.

13. In the FCC's *Lifeline Reform Order*, the FCC declined to impose a minimum consumer charge for federal Lifeline services.
14. The FCC rules do not prohibit states from requiring state-designated ETCs to assess and collect a minimum charge from Lifeline subscribers.
15. Decision 10-11-033 and General Order 153, Sections 8.1.4 and 8.1.5, require price floors of \$5.00 and \$2.50 for Flat and Measured rate services, respectively, for California LifeLine customers through December 31, 2012.
16. In accordance with D.10-11-033, beginning January 1, 2013, the \$5.00 and \$2.50 price floor amounts for Flat and Measured Rate California LifeLine services respectively are applicable only for the purposes of calculating carriers' Specific Support Amount reimbursements for its California LifeLine customers.
17. Consistent with our policy to remove the price floors for California LifeLine service, beginning January 1, 2013, we will not impose minimum price floors for wireless federal Lifeline service plans.
18. Two safety considerations are inherent with any wireless Lifeline service: the removal of the handset from the home, and poor mobile reception resulting from weather conditions, terrain, or gaps in service coverage.
19. Virgin should address wireless safety issues in its customer informational and marketing materials and on its websites.
20. Virgin shall continue to comply with General Order 153's verification and certification processes.
21. Virgin shall not offer federal Lifeline plans to customers until their Lifeline eligibility is approved by the Commission's LifeLine Administrator.
22. Virgin shall continue to clearly label its offerings as federal Lifeline services to minimize customer confusion between state and federal Lifeline programs.
23. Virgin shall provide adequate information about the potential coverage and service quality issues to its customers.
24. Virgin shall provide and obtain approval from CD staff of its marketing and informational materials prior to publication.

25. On January 29, 2013, the Commission served a draft of this Resolution for comments to all persons on the attached Service List.
26. No opening or reply public comments were submitted on this Resolution.

THEREFORE, IT IS ORDERED that:

1. The Commission ratifies the Communications Division's (CD) December 5, 2012, approval of Virgin Mobile USA's, L.P. (U-4327-C), (doing business as Assurance Wireless) request to provide four new wireless federal Lifeline rate plans to eligible customers in California, Advice Letter No. (AL) 3A and 3B, filed October 2, 2012, and October 26, 2012, respectively.
2. Virgin's new rate plans are consistent with D. 10-11-033 and General Order 153 and the Federal Communications Commission's Universals Service Rules.
3. Virgin is authorized to offer its federal Lifeline Free Plan, \$5.00 Plan, new \$20.00 Plan and \$30 Unlimited Plan to eligible consumers in California, excluding the service areas of the Small Local Exchange carriers.
4. Virgin is not authorized to receive any LifeLine subsidy from the California LifeLine Fund for providing federal Lifeline services in California.
5. Virgin shall continue to comply with the requirements of General Order 153 regarding verification and certification processes.
6. Virgin shall not provide federal Lifeline plans to customers until their Lifeline eligibility is approved by the California LifeLine Administrator.
7. Virgin shall continue to clearly label its Lifeline offerings as federal Lifeline to minimize customer confusion between state and federal Lifeline programs.
8. Virgin shall provide adequate information to its customers about the potential coverage, service quality and safety issues a customer may encounter when selecting a wireless federal Lifeline plan versus a state wireline LifeLine plan.
9. Virgin shall provide and obtain approval from CD staff of its marketing and informational materials prior to publication.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on February 28, 2013, the following Commissioners voting favorably thereon:

PAUL CLANON
Executive Director

Attachment A
Resolution T-17388 Service List

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Attachment A
Resolution T-17388 Service List

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