PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division **RESOLUTION T-17655**
Carrier Oversight and Program Branch **May 30, 2019**

R E S O L U T I O N

Resolution T-17655. Approval of AT&T California's (U-1001-C) Advice Letter setting forth its annual fine and alternative proposal for mandatory corrective action for failing to meet required service quality performance standards in Year 2018 pursuant to General Order 133-D.

SUMMARY

This Resolution approves AT&T California's (U-1001-C) Advice Letter setting forth its annual fine and alternative proposal for mandatory corrective action for failing to meet required service quality performance standards in Year 2018, pursuant to General Order 133-D § 9.6. AT&T California calculated its annual fines totaling $3,702,600 by applying the prescribed method for each month it failed to meet specific minimum standards for the *Out of Service Repair Interval* measure under GO 133-D §§ 3.4[1]. In lieu of paying a fine, AT&T California requests approval to implement the alternative proposal for mandatory corrective action under § 9.7, which permits a carrier to invest no less than twice the amount of its annual fine in a project(s) that improves service quality in a measurable way within two years.

BACKGROUND

In General Order (GO) 133-D, *Rules Governing Telecommunications Services*, the California Public Utilities Commission (Commission) established uniform minimum standards of service for facilities-based wireline telephone carriers to achieve in their operations as public utility telephone corporations serving California customers. These minimum standards of service include quarterly reporting by some wireline carriers of five measures and near real-time reporting by all carriers of major outages.[2]

1. Procedural History of the General Order

[1] All sections (§) references are to GO 133-D unless otherwise noted.
[2] See the annual data in *Quarterly Service Quality Reports* posted at http://www.cpuc.ca.gov/General.aspx?id=1107 on the Communications Division *Telecommunications Carriers' Service Quality Reports* webpage. (Site last visited June 19, 2018.).

In March 2011, Staff issued a report detailing substandard levels of service quality reported by carriers for 2010. In response, the Commission opened Rulemaking (R.)11-12-001 to review carriers' performance, to assess the relevancy and effectiveness of GO 133-C[3] measures, and to determine the need for penalties for substandard performance.

On August 29, 2016, the Commission issued Decision (D.)16-08-021 which adopted GO 133-D. GO 133-D revised and replaced portions of GO 133-C by modifying and expanding on a number of its provisions and prescribing monetary penalties for violating the five service quality standards.[4] Carrier performance determines fines, which apply only to traditional voice telephone service.[5] GO 133-D became effective on August 18, 2016, with the exception of Section (§) 9 (*Fines*), which became effective January 1, 2017.

2. Service Quality Reporting and Standards of Performance

General Order 133-D stipulates five telephone service quality measures with minimum standards that operators of public utility telephone corporations must meet: *Installation Interval*, *Installation Commitments*, *Customer Trouble Report*, *Out of Service Repair Interval*, and *Answer Time*. Each measure has an assigned Minimum Standard Reporting Level. When a carrier's performance falls below any of the minimum standards, the carrier is out of compliance and must report this information to the Commission.[6]

Under GO 133-D § 9.3, a carrier is subject to fines upon reaching "chronic failure status," which is defined as a failure to meet a Minimum Standard Reporting Level for three (3) consecutive months. Fines begin to accrue in the third month. A carrier exits "chronic failure status" when it meets the standard for two consecutive months. Until then, the carrier incurs fines for the succeeding months it fails to meet the standard.

General Order 133-D, § 9.6 directs any telephone corporation whose performance does not meet the minimum standards to submit annually, by February 15 of the following year, a Tier II Advice Letter (AL). The AL must show by month each service quality measurement for which the carrier did not meet the minimum standard and the applicable fine. The Communications Division will then prepare a resolution that, if adopted by the Commission, instructs a telephone corporation to pay the fine to the Commission for deposit into the California General Fund.

GO 133 § 9.7 allows carriers to file an alternative proposal for mandatory corrective action to suspend fine payments and instead invest no less than twice the fine amount in projects that will improve service quality in a measurable way within two years. Such investment(s) must demonstrate that 1) twice the amount of the fine is spent, 2) the project(s) is an incremental

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[3] The Commission approved GO 133-C in Decision 09-07-019 (July 9, 2009).
[4] Fines apply to facilities-based telephone corporations regulated under the Uniform Regulatory Framework that possess a franchise or a Certificate of Public Convenience and Necessity.
[5] GO 133-D defines time division multiplexing (TDM)-based voice service as "traditional telephone service."
[6] See *Appendix A* for a list of all carriers' annualized service quality data, 2014-2017.

expenditure, 3) the project(s) design addresses service quality deficiencies. In addition, upon completion, the carrier will demonstrate the project results for the approved proposal.

ADVICE LETTER

AT&T California submitted Advice Letter (AL) 47735 on February 15, 2019, summarizing its total year 2018 service quality reporting targets and including fine calculations for the standards not met. In AL 47735, AT&T California calculated a total fine amount of $3,702,600. Rather than paying this fine into the state General Fund, AT&T California requested approval of its alternative proposal for mandatory corrective action under § 9.7 to invest no less than twice the amount of its calculated fine in projects to improve its customers' service quality in a measurable way.

In AL 47735, AT&T California proposed investing $7,405,200 to improve the communications infrastructure that is used to provide traditional telephone service. However, rather than include information regarding specific projects, AT&T California stated their investment would focus primarily on areas that need rehabilitation of existing copper plant. AT&T California stated that any remaining funds would be directed towards constructing new fiber facilities in areas where the company has a higher number of reported trouble tickets and higher maintenance costs.[7]

On April 9, 2019, Staff issued a data request to AT&T California to determine the cause of the chronic failure to meet the OOS repair interval metric, requesting a response to the following: 1) What factor(s) are responsible for the chronic failure of AT&T California to meet the OOS repair interval metric; and 2) when AT&T California will be in compliance with the OOS repair interval metric.

On April 12, 2019, AT&T California responded to Staff's data request. The response stated that "AT&T's [inability] to meet the out of service (OOS) metric reflects a faulty metric, not a deficiency in service quality."[8]

Resolution T-17625 directed AT&T California to file a Tier II advice letter demonstrating the results of their projects to measurably improve service quality in its network two years from the date of the Resolution approving AT&T California's alternative proposal for mandatory corrective action.[9] Since we have not reached the two year mark from the date the 2018 resolution was approved, it is too early to determine the effectiveness of AT&T California's prior investment commitments.[10]

NOTICE/PROTESTS

[7] AL 47735, p. 2.
[8] AT&T Response to AL 47734 Data Request-01.
[9] See Resolution T-17625, p. 9.
[10] Resolution T-16725 was approved on November 8, 2018.

AT&T California served its AL 47735 filing via email to all parties on the general service list and the AL appeared in the Commission's Daily Calendar on February 22, 2019.

On March 7, 2019, The Utility Reform Network (TURN) and the Public Advocates Office filed a joint protest. The protest stated that 1) the GO 133-D penalty mechanism is insufficient to ensure carriers meet the Commission's service quality standards and thus GO 133-D should be revised, 2) AL 47735 does not explain why AT&T California is in chronic failure status for this metric, 3) stakeholders are unable to determine the effectiveness of AT&T California's prior investment commitments, 4) the Commission should consider requiring a larger investment from AT&T California to ensure compliance with GO 133-D service quality standards.

On March 14, 2019, AT&T California responded to the joint protest by TURN and the Public Advocates Office. AT&T California's response stated that Rule 7.4.2 of General Order 96-B specifies the grounds on which an advice letter may be protested, and that the joint protest fails to identify any of the valid grounds specified by General Order 96-B.

Upon review of the joint protest, Staff has determined that TURN and the Public Advocates Office did not identify appropriate grounds for protest according to General Order 96-B.

DISCUSSION

Throughout 2018, AT&T California submitted its quarterly service quality reports for *Customer Trouble Reports*, *Out of Service Repair Intervals*, and *Answer Time* standards in accordance with GO 133-D, § 3.[11] The monthly reported service quality data, compared to the Minimum Standard Reporting Levels, determines whether AT&T California is subject to fines.

Those monthly performance results and AT&T California's unique scaling factor determine the amount of the fine, which is described as follows:

1. 2018 Scaling Factor

GO 133-D assigns fine amounts using base values specified in §§ 9.3, 9.4, and 9.5, adjusted through a formula expressing the relative size of the carrier within the California market.[12] The scaling factor formula is as follows:

(Carrier's GO 133-D Access Lines / Total CA Access Lines) = **Carrier's Scaling Factor**

[11] GRC ILECs are the only carriers that must report *Installation Interval* and *Installation Commitment*, §§ 3.1 and 3.2, respectively.

[12] Annually, the Communications Division prepares a list of the total number of working telephone access lines in California from carriers' subject to GO 133-D requirements. Based on carrier size relative to the number of access lines it serves at the end of June in the reporting year, a carrier receives its unique Scaling Factor, the percentage of its customers relative to all California telephone customers. The table of carriers, working lines, and the percentage of working lines served by each carrier appears as a PDF document titled *Total Number of Access Lines in California for June 2017 from Carriers Reporting Under G.O. 133-D* found under *Reference Information* at http://www.cpuc.ca.gov/General.aspx?id=1107. (Site last visited May 31, 2018.)

(Carrier's Scaling Factor) x (Monthly Base Fine per Measure) x (Number of Months in Chronic Failure) = **Fine**

AT&T California reported 2,428,862 working lines according to GO 133-D, so its 2018 Scaling Factor is 41.14%.

2. GO-133-D Standards

A. Installation Interval

The standard for *Installation Interval*, as defined in § 3.1, applies only to the GRC ILECs. AT&T California is an URF ILEC and thus this standard is not applicable.

B. Installation Commitments

The standard for *Installation Commitments*, as defined in § 3.2, applies only to the GRC ILECs. AT&T California is an URF ILEC and thus the standard is not applicable.

C. Customer Trouble Reports

The *Customer Trouble Reports* standard, as defined in § 3.3, measures the number of reports a carrier receives from its customers regarding their dissatisfaction with telephone company services. The Minimum Standard Reporting Level for the *Customer Trouble Reports* standard varies based on the number of working lines per reporting unit.[13]

AT&T California met the *Customer Trouble Reports* standard in all twelve months of 2018.

	2018 Reporting for *Customer Trouble Reports*, GO 133-D, § 3.3 – Reports per 100 Working Lines											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
AT&T California	2.3%	1.3``%	1.9%	1.4%	1.3%	1.1%	1.2%	1.3%	1.1%	1.4%	1.3%	2.2%

D. Out of Service Repair Interval

The *Out of Service Repair Interval*, as defined in § 3.4, measures the average interval between the time a carrier responds to an out of service trouble report and the restoration of the customer's service. A carrier measures its average interval by taking the sum of the total number of out of service repair tickets restored within 24 hours and dividing by the total number of

[13] According to GO 133-D § 3.3(c), the Minimum Standard Reporting Levels for the *Customer Trouble Reports* standard are as follows: Six trouble reports per 100 working lines (6%) for reporting units with 3,000 or more working lines, eight reports per 100 working lines (8%) for reporting units with 1,001-2,999 working lines, and 10 reports per 100 working lines (10%) for reporting units with 1,000 or fewer working lines.

reports received. The Minimum Standard Reporting Level for the *Out of Service Repair Interval* is 90% of outages restored within 24 hours or less.

The fine structure is as follows:

Base *Out of Service Repair Interval* Fine, GO 133-D, Section 9.3		
	1 or 2 Consecutive Months Standard Not Met	3 or more Consecutive Months Standard Not Met
Fine Per Day	$0 per day	$25,000 per day
Days in a Month (for all months)	30 days	30 days
Base Fine per Month	$0	$750,000 per month

AT&T California failed to meet the *Out of Service Repair Interval* standard for the following months in 2018:

	2018 Reporting for *Out of Service Repair Interval*, GO 133-D, Section 3.4 – 90% minimum											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
AT&T California	43.1%	68.0%	60.8%	69.0%	68.0%	55.8%	53.9%	59.3%	59.9%	59.4%	55.1%	35.3%

AT&T California did not meet the minimum standard of restoring 90% of tickets within 24 hours or less for any month or quarter in 2018. In addition, since the adoption of GO 133-D, AT&T California has never met the minimum *Out of Service Repair Interval* standard and has been in "chronic failure status" since June 2017. Consequently, AT&T California calculated its fine based on the 12 months it was in "chronic failure status" for failure to meet the *Out of Service Repair Interval* standard from January through December in 2018. Staff agrees with AT&T California's fine calculation for its substandard performance, which is as follows:

(Scaling Factor 41.14%) X (Monthly Base Fine per Measure $750,000)

X (12 Months in Chronic Failure in 2018) = Fine of $3,702,600[14]

E. Answer Time for Trouble Reports and Billing and Non-Billing Inquiries

The *Answer Time* standard, as defined in § 3.5, measures the amount of time it takes for an operator to answer the phone when customers call a business office for billing and non-billing inquiries or a repair office for trouble reports. The value is calculated as an average answer time

[14] In AL 47735, AT&T makes reference of the fine amount as $3.7 million and the investment amount as $7.4 million, but these figures are rounded and do not reflect the actual amount, shown above.

of a sample of the answering interval of calls to business and repair offices that is representative of the reported period.

The Minimum Standard Reporting Level for *Answer Time* is 80% of calls answered by an operator within 60 seconds when speaking to a live agent, or 80% of calls answered within 60 seconds when speaking to a live agent after completing an interactive voice response or automatic response unit system.

Base *Answer Time* Fine, GO 133-D, Section 9.5					
	1 or 2 Consecutive Months	3 to 5 Consecutive Months	6 to 8 Consecutive Months	9 to 11 Consecutive Months	12 or More Consecutive Months
Fine Per Day	$0 per day	$500 per day	$1,000 per day	$1,500 per day	$2,000 per day
Days in a Month (for all months)	30 days	30 days	30 days	30 days	30 days
Base Fine per Month	$0	$15,000	$30,000	$45,000	$60,000

AT&T California's Answer Time results in 2018 are as follows:

	2018 Reporting for *Answer Time,* GO 133-D Section 3.4 – 80% minimum											
	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sept	Oct	Nov	Dec
AT&T California	73.1%	85.8%	85.8%	87.1%	87.3%	81.2%	80.0%	92.1%	88.0%	92.9%	90.2%	86.9%

AT&T California failed to meet the *Answer Time* standard for January in 2018. However, AT&T California met the *Answer Time* standard for the rest of 2018 and thus no fine is applicable. Staff agrees with AT&T California's calculation for the *Answer Time* standard.

3. Staff Concerns with AT&T California's Initial Proposal

In AL 47735, AT&T California filed an alternative proposal for mandatory corrective action to avoid paying a fine for substandard service quality.[15] AT&T California states in AL 47735 that

[15] See Section 9.7 of GO 133-D for more information on alternative proposals allowed for mandatory corrective action.

its investments would be "focused on projects that will improve the communications infrastructure over which traditional telephone service is provided."[16] However, rather than identify specific project areas that would address substandard service quality, AT&T California proposed to prioritize their investments by focusing on the top 20% of distribution areas with the highest maintenance costs resulting from trouble reports.[17]

AT&T California's initial proposal failed to include a list of specific projects in the Advice Letter to address poor service quality in central offices that have experienced lengthy and/or repeated outages. Staff provided AT&T California with analysis that highlighted the "worst" performing central offices based on the number of outages lasting more than 24 hours for every access line served by each central office. Of the 50 worst central offices provided to AT&T California, 28 were not part of the company's 2017 GO 133-D alternate investment proposal.

On March 12, 2019, Staff sent a letter to AT&T California requesting a prioritization of these 28 central offices areas in their 2018 investment proposal. The letter directed AT&T to file a supplement identifying these specific central office locations as part of the 2018 alternate investment plan. In its supplemental filing, AT&T California selected the suggested 28 locations from a list Staff provided of the 50 worst central office locations for 2018.[18]

4. AT&T California's Supplemental Filing for Revised Alternative Proposal for Mandatory Corrective Action

On April 3, 2019, AT&T California filed AL Supplement 47335A and committed to performing construction and engineering projects in each of the 28 central office areas[19] previously identified by Staff.[20] In its revised proposal, AT&T California stated it will identify specific projects using existing business practices previously mentioned and improve service quality by reducing the frequency of initial and repeat repair tickets. AT&T California did not propose to spend the entire investment amount in the "worst" central offices identified by Staff. Staff believes the proposed $7,405,200 investment is significant and has the potential to improve AT&T California's service quality in a measurable way.

AT&T California states in AL 47735A that the $7,405,200 investment will be an incremental expenditure "focused on projects that will improve the communications infrastructure over which traditional telephone service is provided."[21] Staff accepts AT&T California's explanation

[16] Advice Letter 47735, p. 2.
[17] Advice Letter 47735, p. 2.
[18] See AL 47735A.
[19] These 28 locations are different from and in addition to the 32 locations approved in Resolution T-17625, AT&T's Alternative Proposal for Mandatory Corrective Action for its substandard service quality in 2017.
[20] Under D.16-08-024, GO 66-D, and P.U. Code § 583, regarding the treatment of confidential information, AT&T California properly filed an Attestation to the sensitive nature of the Supplement's project information related to the network facilities, the specific investment improvements, and the financial information for the construction. Staff therefore excluded specific project information from this Resolution. *Appendix A-2* shows AT&T California's service area within which the company has planned its investment projects.
[21] AL 47735, p. 2.

regarding these future projects being incremental expenditures based on AT&T California's assertion, as the Commission does not rate-regulate AT&T California.
Staff also accepts AT&T California's commitments in AL 47735A to complete all service quality improvement projects within the two years specified by GO 133-D, as well as to hold quarterly meetings with Staff to review the progress of all the projects.[22]

AT&T California shall demonstrate improved results from the project areas to the Commission through its quarterly GO 133-D service quality reports. In two years, AT&T California shall file a Tier II advice letter demonstrating the results of their proposed projects to measurably improve service quality in its network.

If any of the project areas approved by the Commission are not addressed, or otherwise fail to improve AT&T California's service quality in a measurable way, the Commission may consider further penalties and other enforcement actions. The Commission may also choose to reject a future proposal for suspension of the fine using the § 9.7 Alternative Proposal for Mandatory Corrective Action.

SAFETY CONSIDERATIONS

Failure to meet the GO 133-D service quality standards limits customers' ability to contact 9-1-1 and emergency services and restricts public safety personnel from communicating with each other in the event of emergencies or major disasters. This proposal may improve safety by increasing network reliability.

CONCLUSIONS

Staff recommends Commission approval of AT&T California's AL 47735 for Year 2018 GO 133-D fines according to its submitted plan of an alternative proposal for mandatory correction action. AT&T California will commence projects worth $7,405,200 to be completed within 2 years.

[22] We strongly encourage—and may take future steps to require—AT&T California to ensure that it has an adequately-sized workforce of experienced employees with the appropriate training and skills to provide uninterrupted telecommunications service. The California Legislature recently required as much of electric and gas utilities (see Sen. Bill No. 901 (2017-2018 Reg. Sess.) § 34), and we see no reason why the conclusions reached there would not hold for communications utilities too. Thus, we encourage AT&T California to limit its use of outside contractors to situations where AT&T California technicians are unavailable, or where they lack the necessary skills or equipment to do the work.

We also encourage AT&T California to report its use of outside contractors to Communications Division staff. It would be most useful if those reports contained information such as (1) which projects used outside contractors; (2) the name of the contracting companies; (3) the type of work performed; (4) the dollar amount spent by AT&T California on contracted work; (5) the number of contracted employees performing the work; (6) the total contracted work hours performed; (7) the wages paid to contracted employees; and (8) the cost and terms of employee benefit plans (e.g. medical, savings, pension) offered to contracted employees. Communications Division staff may issue data requests if these reports are not forthcoming, or to supplement the information these reports contain.

COMMENTS

In compliance with Public Utility Code § 311(g), the Commission emailed a notice letter on April 30, 2019, informing all parties on the carrier service list of the availability of this Resolution for public comments at the Commission's website www.cpuc.ca.gov. The notice letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at this same website.

On May 20, 2019, the Public Advocates Office and TURN filed comments on Draft Resolution T-17655.

The Public Advocates Office recommends AT&T should be required to file additional supplemental information on the projects comprising their proposal within 45 days of the adoption of this Resolution. This information is to include the expected construction timeline, the budget for each project, and the estimates of customers impacted by each project.[23] Furthermore, the Public Advocates Office recommends the Commission require AT&T to provide the construction timeline, budget for each project, and estimates of customers impacted by each project in all future proposals for mandatory corrective action.[24]

TURN recommends the Commission consider additional fines if these investments do not bring AT&T into compliance within two years.[25] TURN further recommends that the Commission ensure AT&T's investments are incremental in nature and that the Commission seek additional information on the investment projects, including locations and amounts allocated.

Staff notes that pursuant to G.O. 133-D, § 9.7, providers have up to two years to complete the proposed reinvestment projects. In response to the comments of the Public Advocates Office and TURN, Staff does not request further information at this time, but may request further information regarding reinvestment projects. If AT&T California's service quality in the twenty-eight project areas approved by the Commission does not improve in a measurable way within two years, the Commission may consider proposing further penalties or other enforcement actions. Staff accepts AT&T California's explanation regarding these future projects being incremental expenditures based on AT&T California's assertion, as the Commission does not rate-regulate AT&T California.

FINDINGS

1. General Order 133-D, § 9.6 directs any telephone corporation whose performance does not meet the minimum standards to submit annually by February 15 of the following year a Tier II Advice Letter that shows by month each service quality measurement for which it did not meet the minimum standard and the applicable fine.

[23] Public Advocates Office Comments on Draft Resolution T-17655, p. 2.
[24] Public Advocates Office Comments on Draft Resolution T-17655, p. 2.
[25] TURN Comments on Draft Resolution T-17655, p. 3.

2. On February 15, 2019, AT&T California (U-1001-C) filed Advice Letter 47735, which calculated a total fine amount of $7,405,200 and included its alternative proposal for mandatory corrective action under General Order 133-D § 9.7.

3. The total calculated fines for each of the service quality standards are as follows:

Service Quality Standard	AT&T California (U-1001-C)
Installation Interval	$0
Installation Commitments	$0
Customer Trouble Reports	$0
Out of Service Repair Interval	$3,702,600
Answer Time	$0
TOTAL	$3,702,600

4. In Advice Letter 47735, AT&T California proposed to invest $7,405,200 on projects that would improve the communications infrastructure used to provide traditional telephone service.

5. On March 7, 2019, The Utility Reform Network (TURN) and the Public Advocates Office filed a joint protest stating the GO 133-D penalty mechanism is insufficient, that a larger investment requirement should be considered, it is unclear how effective the alternate investment proposals are, and AL 47735 does not explain why AT&T California continues to be in a chronic failure state for the out of service repair interval metric.

6. On March 7, 2019, AT&T California replied to the joint protest from TURN and the Public Advocates by stating the grounds on which the protest was made are not valid according to Rule 7.4.2 of General Order 96-B.

7. AT&T California's investment priority for selecting projects will be determined by focusing on their top 20% of distribution areas with the highest maintenance costs resulting from trouble reports.

8. AT&T California did not include a list of current or planned projects for 2019 and 2020 and stated they do not budget for specific projects because they are identified and reprioritized based on greater effects and returns.

9. On March 12, 2019, Staff advised AT&T California to file a supplemental advice letter specifying that investments will be made in twenty-eight of the 50 Central Offices with the highest number of outages exceeding 24 hours that are not already being targeted by investments from the preceding year's alternate investment proposal.

10. On April 3, 2019, AT&T California filed Advice Letter Supplement 47735A, in which it committed to performing service quality improvement projects in each of the twenty-eight Central Office areas previously identified by Staff. However, AT&T California is not required to spend the entire $7,405,200 investment solely within these twenty-eight areas.

11. Staff determined that even though AT&T California did not include specific projects in Advice Letter Supplement 47735A, the $7,405,200 investment is significant and has the potential to improve the company's service quality in a measurable way.

12. AT&T California stated their projects could be completed within two years, are incremental compared to the company's normal level of funding, and would not otherwise be addressed.

13. AT&T California agreed to hold regular quarterly meetings with Staff in order to review the progress of all projects and ensure they remain on schedule.

14. AT&T California is required to file a Tier II Advice Letter showing improved service quality, upon completion of the approved projects.

15. If AT&T California's service quality in the twenty-eight project areas approved by the Commission does not improve in a measurable way within two years, the Commission may consider proposing further penalties or other enforcement actions.

16. On April 30, 2019, the Commission emailed a draft of this Resolution to all parties in the carrier service list for public comments.

THERFORE, IT IS ORDERED that:

1. The California Public Utilities Commission approves AT&T California's (U-1001-C) Advice Letter 47735, which calculates its total fine amount of $3,702,600 and includes its 2018 alternative proposal for mandatory corrective action. AT&T California shall invest no less than twice the amount of its calculated $3,702,600 fine ($7,405,200) on projects that will improve service quality in a measurable way within its service territory.

2. All service quality improvement projects shall be completed within two years of the adoption of this Resolution.

3. AT&T California shall, at minimum, perform service quality improvement projects in each of the twenty-eight central office areas identified in Advice Letter 47735A.

4. AT&T California shall hold quarterly meetings with Staff to review the progress of all projects and ensure they remain on schedule.

5. AT&T California shall file a Tier II Advice Letter upon completion of all projects to demonstrate improved service quality results.

This Resolution is effective today.

I hereby certify that the California Public Utilities Commission adopted this Resolution at its regular meeting on May 30, 2019. The following Commissioners approved it:

______/s/ALICE STEBBINS____
ALICE STEBBINS
Executive Director

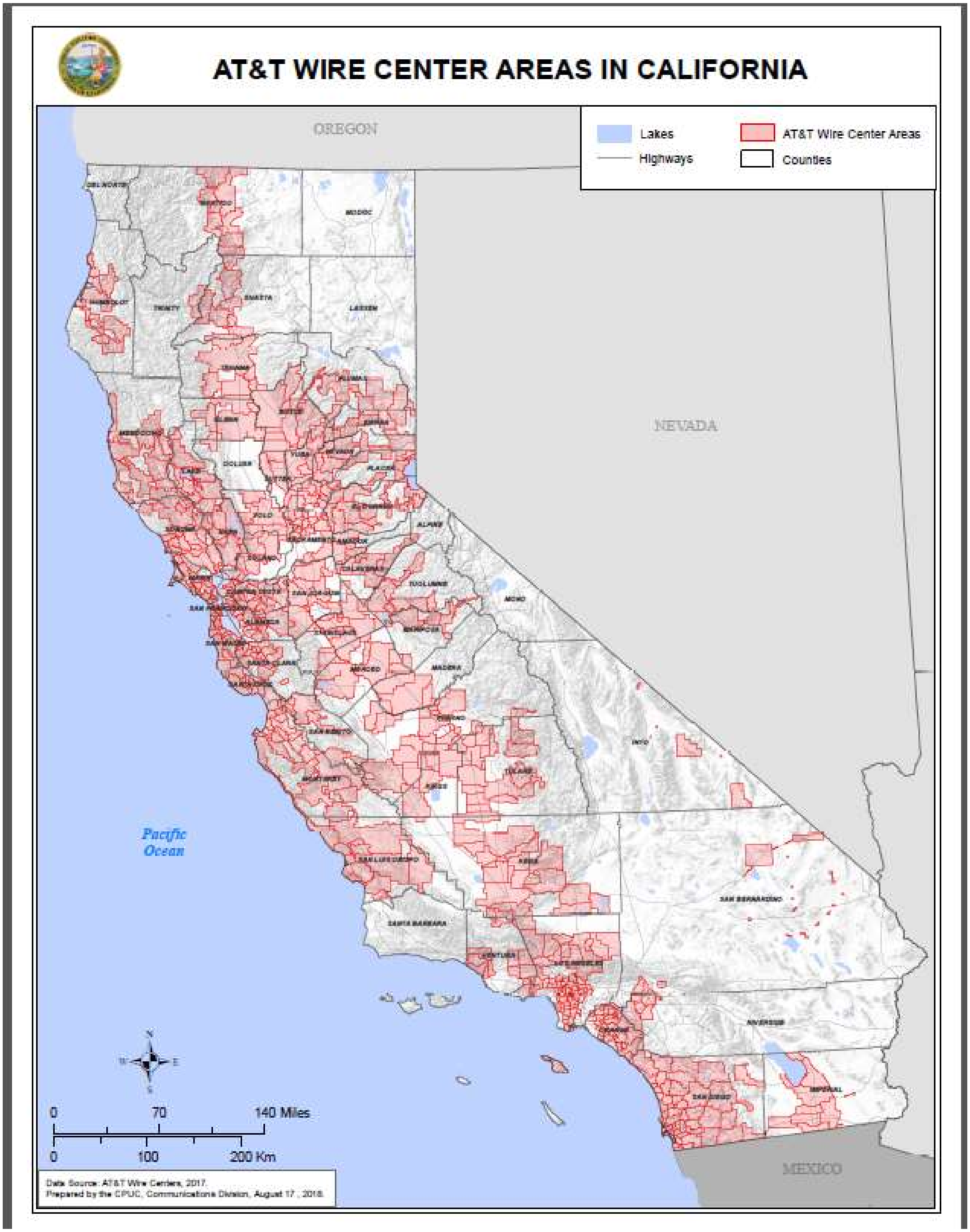
MICHAEL PICKER
President
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
Commissioners

APPENDIX

Carrier Average Annual GO 133-C and GO 133-D Reported Service Quality Results, 2015 - 2018

Type	Company Name	Utility Number	2015 Installation Interval (days)	2015 Installation Commitment	2015 Customer Trouble Reports	2015 Out of Service Repair Interval	2015 Answer Time	2016 Installation Interval (days)	2016 Installation Commitment	2016 Customer Trouble Reports	2016 Out of Service Repair Interval	2016 Answer Time
URF ILEC	AT&T California	U-1001-C	Exempt		1.39%	65%	88%	Exempt		1.50%	56%	82%
URF ILEC	Frontier Citizens	U-1024-C	Exempt		0.86%	77%	71%	Exempt		0.78%	83%	70%
URF ILEC	Frontier Southwest	U-1026-C	Exempt		0.97%	88%	71%	Exempt		1%	84%	70%
URF ILEC	SureWest	U-1015-C	Exempt		0.77%	86%	53%	Exempt		0.85%	87%	71%
URF ILEC	Verizon/Frontier California	U-1002-C	Exempt		0.90%	73%	72%	Exempt		0.77%	57%	56%
URF CLEC	ACN Communications	U-6342-C	Exempt		0.72%	3%	60%	Exempt		1.12%	5%	64%
URF CLEC	AT&T Corporation	U-5002-C	Exempt		1.60%	72%	71%	Exempt		2.45%	75%	--
URF CLEC	Time Warner Cable	U-6874-C	Exempt		--	--	--	Exempt		0.51%	91%	94%
URF CLEC	Charter Fiberlink	U-6878-C	Exempt		--	--	--	Exempt		--	--	--
URF CLEC	Bright House	U-6995-C	Exempt		--	--	--	Exempt		--	--	--
URF CLEC	Cox California	U-5684-C	Exempt		1.70%	89%	86%	Exempt		1.70%	88%	--
URF CLEC	Paetec Communications	U-6097-C	Exempt		0.96%	95%	56%	Exempt		0.98%	94%	--
URF CLEC	Sonic Telecom	U-7002-C	Exempt		0.13%	43%	78%	Exempt		0.34%	56%	82%
GRC ILEC	Calaveras Tel.	U-1004-C	2.21	100%	0.29%	100%	--	1.46	100%	0.19%	100%	--
GRC ILEC	Cal-Ore Telephone	U-1006-C	2.15	99%	1.94%	95%	--	1.96	98%	1.82%	98%	--
GRC ILEC	Ducor Telephone	U-1007-C	0.22	100%	0.80%	98%	--	2.4	100%	0.13%	99%	--
GRC ILEC	Foresthill Tel.	U-1009-C	1.5	100%	1.06%	99%	--	1.54	100%	1.14%	95%	98%
GRC ILEC	Happy Valley Tel.	U-1010-C	2.74	100%	3.05%	95%	85%	2.8	100%	1.11%	92%	--
GRC ILEC	Hornitos Telephone	U-1011-C	2.00	99%	4.82%	94%	85%	2.72	100%	3.39%	92%	--
GRC ILEC	Kerman Telephone	U-1012-C	2.86	100%	0.76%	97%	--	1.95	98%	1.54%	97%	99%
GRC ILEC	Pinnacles Tel.	U-1013-C	0.71	100%	0.50%	100%	--	0.45	100%	0.24%	100%	--
GRC ILEC	Ponderosa Tel.	U-1014-C	2.51	100%	0.68%	97%	--	2.27	100%	1.28%	91%	--
GRC ILEC	Sierra Telephone	U-1016-C	1	100%	0.65%	98%	--	0.96	99%	0.82%	98%	88%
GRC ILEC	Siskiyou Telephone	U-1017-C	0.91	100%	0.26%	100%	--	0.74	100%	0.25%	100%	--
GRC ILEC	Volcano Telephone	U-1019-C	1.3	100%	0.30%	89%	90%	1.44	100%	0.29%	76%	83%
GRC ILEC	Winterhaven	U-1021-C	2.18	100%	1.09%	98%	89%	3.17	100%	1.82%	98%	--

Type	Company Name	Utility Number	2017 Installation Interval (days)	2017 Installation Commitment	2017 Customer Trouble Reports	2017 Out of Service Repair Interval	2017 Answer Time	2018 Installation Interval (days)	2018 Installation Commitment	2018 Customer Trouble Reports	2018 Out of Service Repair Interval	2018 Answer Time
URF ILEC	AT&T California	U-1001-C	Exempt		1.72%	48%	81.5%	Exempt		1.48%	56%	86%
URF ILEC	Frontier Citizens	U-1024-C	Exempt		0.82%	65%	71%	Exempt		.65%	83%	62%
URF ILEC	Frontier Southwest	U-1026-C	Exempt		1.1%	75%	71%	Exempt		.78%	88%	62%
URF ILEC	SureWest	U-1015-C	Exempt		0.79%	93%	77%	Exempt		.85%	91%	66%
URF ILEC	Verizon/Frontier California	U-1002-C	Exempt		0.82%	63%	71%	Exempt		.72%	77%	62%
URF CLEC	ACN Communications	U-6342-C	Exempt		1.17%	5%	58%	Exempt		--	--	--
URF CLEC	AT&T Corporation	U-5002-C	Exempt		1.65%	52%	91%	Exempt		1.58%	60%	93%
URF CLEC	Time Warner Cable	U-6874-C	8.10	99%	.70%	85%	93%	4.41	98%	.51%	91%	75%
URF CLEC	Charter Fiberlink	U-6878-C	5.58	98%	4.19%	72%	73%	4.23	98%	.99%	91%	76%
URF CLEC	Bright House	U-6995-C	2.73	95%	.25%	64%	80%	3.50	98%	.72%	88%	77%
URF CLEC	Cox California	U-5684-C	Exempt		1.46%	95%	93%	Exempt		1.39%	87%	95%
URF CLEC	Paetec Communications	U-6097-C	Exempt		.04%	94%	62%	Exempt		.82%	71%	58%
URF CLEC	Sonic Telecom	U-7002-C	Exempt		.42%	48%	94%	Exempt		.36%	33%	98%
GRC ILEC	Calaveras Tel.	U-1004-C	1.37	100%	.12%	98%	--	1.15	100%	.13%	100%	--
GRC ILEC	Cal-Ore Telephone	U-1006-C	2.11	97%	1.33%	100%	--	2.20	98%	1.24%	95%	--
GRC ILEC	Ducor Telephone	U-1007-C	0.14	100%	.92%	99%	--	.23	100%	.96%	100%	--
GRC ILEC	Foresthill Tel.	U-1009-C	1.83	97%	1.44%	93%	--	1.43	100%	1.50%	100%	--
GRC ILEC	Happy Valley Tel.	U-1010-C	3.0	100%	1.60%	94%	--	4.73	99%	.85%	75%	--
GRC ILEC	Hornitos Telephone	U-1011-C	3.32	100%	2.7%	94%	--	4.04	91%	3.65%	60%	--
GRC ILEC	Kerman Telephone	U-1012-C	1.60	98%	1.03%	93%	--	1.39	100%	1.14%	98%	--
GRC ILEC	Pinnacles Tel.	U-1013-C	1.14	100%	.80%	100%	95%	1.08	100%	.71%	100%	96%
GRC ILEC	Ponderosa Tel.	U-1014-C	2.32	99%	1.47%	98%	--	1.82	100%	1.37%	98%	--
GRC ILEC	Sierra Telephone	U-1016-C	2.16	99%	.99%	99%	93%	1.51	100%	.70%	100%	96%
GRC ILEC	Siskiyou Telephone	U-1017-C	0.70	100%	.004%	98%	--	1.23	100%	.33%	99%	--
GRC ILEC	Volcano Telephone	U-1019-C	1.20	100%	.88%	71%	85%	1.15	100%	1.19%	89%	--
GRC ILEC	Winterhaven	U-1021-C	3.29	98%	2.52%	98%	--	4.95	100%	1.96%	80%	75%



(End of Appendices)