

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Update
Surcharge Mechanisms to ensure Equity
and Transparency of Fees, Taxes and
Surcharges Assessed on Customers of
Telecommunications Services in California

R. _____

**ORDER INSTITUTING RULEMAKING TO UPDATE THE SURCHARGE
MECHANISM FOR PUBLIC PURPOSE PROGRAMS****Summary**

The California Public Utilities Commission (Commission) initiates this Order Instituting Rulemaking (OIR) to address the need for a sustainable and cost-effective method to fund the state's Universal Service Public Purpose Programs (PPPs). The current funding mechanism for PPPs, based on a percentage surcharge applied to intrastate telecommunications services revenue, is not sustainable due to the continuing decline of intrastate revenue billing base being reported by service providers. This Rulemaking seeks to implement a straightforward and flexible structure for providers to collect and remit surcharges to support the PPPs, while also collecting user fees.

This OIR will do the following:

- A. Phase 1 - Consider reforming the surcharge mechanism for the state PPPs and user fee from the existing revenue-based approach to a per access-line flat-rate end-user mechanism by January 1, 2022; and

- B. Phase 2 - Review the reasonableness of the PPP surcharges and user fees that telecommunications service providers impose on end users, as well as additional taxes, fees and surcharges assessed by federal, state, and local governments.

During this OIR, the Commission will focus on actions to improve the transparency and equitability of these charges in customer billings as well as review the impact that any proposed changes to surcharges and the user fees have on telecommunications service end users that support the programs.

1. Authority and Jurisdiction

Federal law provides that a “State may adopt regulations not inconsistent with the [Federal Communications] Commission’s rules to preserve and advance universal service. Every telecommunications carrier that provides intrastate telecommunications services shall contribute, on an equitable and nondiscriminatory basis, in a manner determined by the State to the preservation and advancement of universal service in that State.”

The California Constitution and Public Utilities (Pub. Util.) Code vest in the California Public Utilities Commission (Commission) regulatory authority over public utilities, including telephone corporations.¹ The Public Utilities Code defines “telephone corporations” as “every corporation or person owning, controlling, operating, or managing any telephone line for compensation within this state”² The California Legislature, pursuant to Pub. Util. Code §§ 709 and the Moore Universal Telephone Service Act (§ 871), contemplated a significant

¹ Cal. Const., art. XII, §§ 3, 6; *see also* Pub. Util. Code, § 216, subd. (b) (“Whenever any . . . telephone corporation . . . performs a service for, or delivers a commodity to, the public or any portion thereof for which any compensation or payment whatsoever is received, that . . . telephone corporation . . . is a public utility subject to the jurisdiction, control, and regulation of the commission and the provisions of this part.”).

² Pub. Util. Code, § 234, subd. (a).

role for the Commission in closing the digital divide in California and bringing advanced communications services to all Californians. The Commission has a statutory mandate to ensure that a public utility's rates, terms, and services are just and reasonable,³ and has plenary authority to carry out this mandate.⁴ Pub. Util. Code §§ 270-285 and 431 authorize the Commission to administer and fund the PPPs and collect user fees.

2. Background

The Commission is responsible for administering the state's six PPPs, including the collection of surcharges and the Commission's user fee⁵, which supports operational costs. Today, the PPP surcharges and the user fee are assessed on intrastate telecommunications services sold in California.⁶ These surcharges are assessed and collected by carriers as a percentage of an end user's telecommunications bill. Carriers report and remit the surcharges monthly to the Commission. The PPPs, set forth in Public Utilities Code Sections 270 to 281, are:

- Universal Lifeline Telephone Service (ULTS): provides discounted home phone and cellular phone services to qualifying households.
- Deaf and Disabled Telecommunications Program (DDTP): provides telecommunications devices to deaf or hearing-impaired consumers.
- California High Cost Fund-A (CHCF-A): provides subsidy to 13 small local exchange carriers (LECs) for providing

³ Pub. Util. Code, § 451.

⁴ Pub. Util. Code, § 701. The Commission may not, of course, exercise its authority where pre-empted by federal law, *see* U.S. Const., art. VI, cl. 2, or where to do so would expressly contradict state law, *see Assembly v. Pub. Util. Com.* (1995) 12 Cal. 4th 90, 103.

⁵ *See* P.U. Code §§ 401-405, 431-435.

⁶ This OIR intends to transition to a bundled surcharge format for all PPPs plus the Commission's user fee into one line-item, per access line, on end-user bills, identified as the "California Universal Service Surcharge".

telephone service to residential customers in rural high-cost areas.

- California High Cost Fund-B (CHCF-B): provides subsidy to carriers of last resort (COLRs) for providing telephone service to residential customers in rural high-cost areas.
- California Teleconnect Fund (CTF): provides a discount on select communications services to schools, libraries, hospitals, and other non-profit organizations.
- California Advanced Services Fund (CASF): supports the deployment of broadband facilities and broadband services adoption in unserved and underserved areas through project-specific grant funding.

Existing law requires that all telephone corporations and Voice over Internet Protocol (VoIP) providers assess and collect PPP surcharges from their end users and remit those revenues to the Commission.⁷ The Commission adopted a revenue-based end-user surcharge mechanism in Decision (D.) 94-09-065⁸ and D. 96-10-066,⁹ which formed the foundation of the Commission's surcharge mechanism to support PPPs. Revisions to these processes are necessary to address the reduction in intrastate revenue billing base that funds PPPs.

⁷ See, e.g., D. 96-10-066, in R.95-01-020, Rulemaking on the Commission's Own Motion into Universal Service and to Comply with the Mandates of Assembly Bill 3643; Investigation on the Commission's Own Motion into Universal Service and to Comply with the Mandates of Assembly Bill 3643. In this decision, the Commission exempted the following services from the PPP surcharges: ULTS billing; coin-sent paid calling; debit card messages; one-way radio paging; usage charges to Coin operated paid telephones; customers receiving services under existing contracts that were executed on or before September 15, 1994; and directory advertising.; See also General Order 153.

⁸ D.94-09-065, in I.87-11-033, In the Matter of Alternative Regulatory Frameworks for Local Exchange Carriers and Related Matters.

⁹ See D.96-10-066.

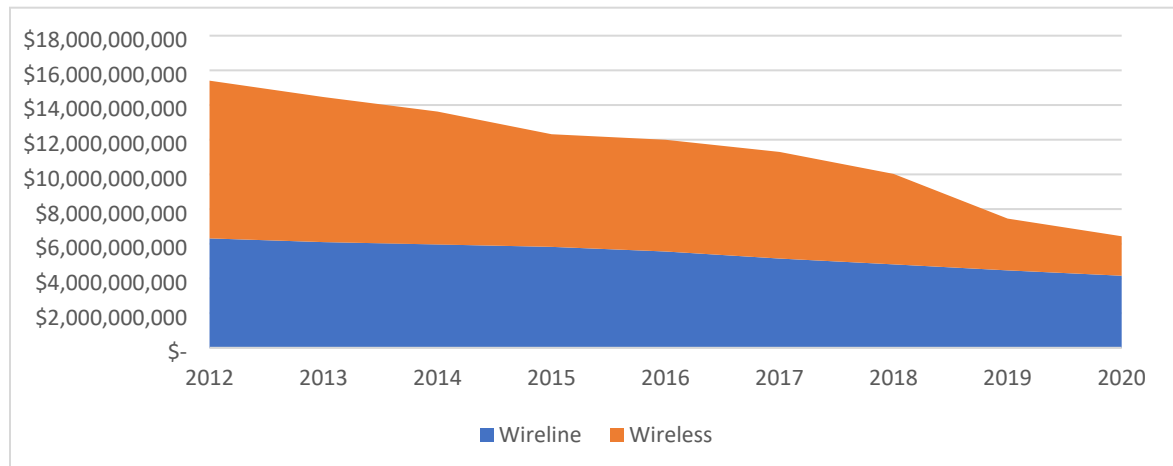
To forecast annual program budget needs for the six PPPs, Commission staff calculates the historical aggregate annual intrastate billing base,¹⁰ then multiplies that number by a remittance rate that achieves collection of the budgeted amount during the next fiscal year.¹¹ When a program's remittance rate requires an increase or decrease to reflect the program's funding needs, Commission staff adopts updated changes via a resolution (while maintaining a reasonable reserve). The same process is used to establish the user fee remittance rate for the Commission's user fee.

2.1. The Decline in Intrastate Billing Base and Program Revenue Collection

The intrastate revenue billing base declined by more than 58 percent between 2012 and 2020 (*See* Chart 1). In 2012, the total reported intrastate revenue subject to surcharge was \$15.406 billion. By 2018 it declined to \$10.027 billion, and in 2019, it decreased by another \$2.657 billion to \$7.370 billion (26 percent), then by \$937 million to \$6.433 billion in 2020.

¹⁰ E.g. Billing base is the total of intrastate revenue reported by all authorized carriers, the data of which is collected and maintained through the Commission's proprietary Telecommunications User Fee Filing System (TUFFS).

¹¹ For instance, if a program budget is forecasted at \$50 million, and the aggregate annual intrastate billing base for all carriers is forecasted at \$10 billion, then a remittance rate of 0.50% of intrastate revenue is required to support the program (\$10,000,000,000 multiplied by 0.50%, equaling \$50,000,000).

Chart 1: Intrastate “Surchargeable” Revenue by Year

Continuing to base surcharges on a declining intrastate billing base will make it necessary for the aggregate surcharge rate — currently at 7.749 percent of an end-user’s intrastate billing — to increase.¹² While some PPPs have maintained financial reserves because of other market factors, some programs have required substantial surcharge rate increases and other programs will need a surcharge increase in the coming year to remain sustainable. California telecommunication services’ end users bear the burden of surcharge rate increases.

The Commission has recently implemented program rate increases. Effective December 1, 2020, the Commission doubled the CHCF-A Program surcharge rate from 0.35 percent to 0.70 percent of intrastate revenue and nearly doubled the CASF surcharge rate from 0.56 percent to 1.019 percent.¹³ These increases became necessary not because program expenses doubled, but because

¹² <https://www.cpuc.ca.gov/general.aspx?id=1124>.

¹³ Resolution T-17705, available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M349/K648/349648474.PDF>; and Resolution T-17709, available at <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M349/K351/349351554.PDF>.

of the ongoing year-over-year decline in the intrastate billing base subject to surcharge. Persistent declines in the sources that contribute to surcharges has resulted in lower surcharge revenue collected for all PPPs, compared to the amount forecasted.

Many factors have contributed to the precipitous decline in intra-state surcharge revenues that support PPPs.

1. The FCC classified text messaging services as information services¹⁴ and thus text messaging services are not subject to Commission surcharges. This contributed to an immediate and sizable decline in wireless intrastate revenue reporting.
2. Competition among wireless providers has caused a decline in the average cost of retail monthly service plans for end users, resulting in decreased intrastate revenue reporting.
3. The FCC has classified broadband Internet access service (data) and voicemail services as information services, eliminating those services as sources of intrastate revenue for surcharge purposes, affecting both wireless and wireline revenues.¹⁵
4. A statewide decline in traditional wireline voice subscriptions resulting in decreased intrastate revenue reporting. In 2010, there were 16.831 million (wireline) access lines. By the end of 2017, the count dropped to 5.805 million access lines.

This combination of factors places a program funding burden on wireline end users, as most of their monthly bills are “intrastate” and therefore subject to surcharges. In contrast, wireless end users whose bills are predominantly

¹⁴ In the Matter of Petitions for Declaratory Ruling on Regulatory Status of Wireless Messaging Service; WT Docket No. 08-7; 33bFCC Rcd 12075 (December 13, 2018) (FCC Declaratory Ruling).

¹⁵ *Id.*

“interstate” due to the data and texting component of their total bill being are exempt from intrastate surcharges.

2.2. The Commission’s Public Purpose Program Collection Mechanism

The Commission requires all service providers to report surcharges online monthly, through the Telecommunications & User Fees Filing System (TUFFS). Once a carrier has determined its aggregate intrastate revenues subject to surcharge for that month, the carrier enters that amount into the TUFFS system. The system then calculates the resulting surcharge amount due for each program (fund). The carrier makes payment to each fund and the User Fee by Automated Clearing House (ACH) debit through the Electronic Funds Transfer (EFT) system.

This OIR would require programming changes to the Commission’s TUFFS in coordination with the Commission’s Information Technology (IT) and Fiscal Services groups. The IT group is currently reviewing logistics and programming needs to estimate cost, scope, resources, and timeline information to facilitate a new surcharge mechanism.

2.3. What Other State and Federal Jurisdictions Have Done to Address Declining Surcharge Revenues

The OIR will examine moving California away from a revenue-based surcharges and consider mechanisms employed in other states. For example, the State of Utah implemented a per access line charge to facilitate Utah Universal Service Funding in R746-8-301,¹⁶. The State of New Mexico has implemented a per access line charge in 2018. In a decision issued by the New Mexico Public

¹⁶ Date of enactment or last substantial Amendment: April 30, 2019.

Regulation Commission, a per-(access) line communications connection surcharge of \$1.17 per month became effective October 1, 2018.¹⁷

The National Regulatory Research Institute publication, on State Universal Service Funds, reports that 20 of the 42 states (plus the District of Columbia) provide support beyond what is provided on the federal level currently administer a per-access line surcharge.¹⁸ The report states: “as consumers have increasingly moved away from traditional wireline landlines, to VoIP, wireless, and other intermodal communications services, the funding available for state universal programs (historically based on a percentage of intrastate revenues) has changed as well, leading to a number of states refocusing their contribution methodologies from revenue to connections in an attempt to stabilize the funds without overburdening consumers.”

According to the National Emergency Number Association (NENA), 45 states impose flat 9-1-1 surcharges on a per-line basis.¹⁹ The California Governor’s Office of Emergency Services (CalOES), which manages California’s 9-1-1 system and surcharge mechanism, transitioned the 9-1-1 charge to a per- access line connection basis pursuant to legislation adopted in 2019.²⁰

Finally, the state members of the Federal-State Joint Board on Universal Service have issued a recommendation to the Federal Communications Commission to revise the existing contribution mechanism for federal universal

¹⁷ Case No. 17-00202-UT, August 16, 2018.

¹⁸ This includes Arizona, Idaho, Illinois, Iowa, Kentucky, Maine, Maryland, Minnesota, Mississippi, Montana, Nebraska, New Hampshire, New Mexico, North Carolina, North Dakota, Ohio, Oregon, Rhode Island, South Dakota, West Virginia, and the District of Columbia. Source: State Universal Service Funds 2018: Updating the Numbers, April 2019.

¹⁹ NENA, the 9-1-1 Association, 9-1-1 Surcharge - User Fees by State (as of September 2020), <https://www.nena.org/page/911RateByState>.

²⁰ See SB 96 (Chapter 54, Statutes of 2019)

service program. This recommendation advocates for adoption of a connections-based assessment on residential services.²¹ These aggregated factors suggest it is time for California to revisit its surcharge mechanism.

2.4. Initial Questions

The primary issue to be addressed in this proceeding is how should the Commission update the existing revenue-based end-user mechanism to collect telecommunications surcharges to ensure it is just, reasonable and transparent as well as sufficient to support the Commission's PPPs. Within 30 days of Commission adoption of this OIR, we direct the respondents named in Section 4 below, as well as any other interested party, to respond in comments to the following questions:

1. Does this proposed OIR simplify or make more complicated the surcharge collection process?
2. Does the proposed OIR benefit providers' billing process?
3. Would a single per-line access charge approach provide stability to Fund balances?
4. Would a single per-line access charge approach better align the Commission's efforts with those at the federal level and the state's Office of Emergency Services?
5. Does a single per-line access charge approach serve as an overall TUFFS system benefit, reducing error frequency by reporting carriers and less time spent by Communications Division and Fiscal Services Staff responding to and correcting carrier entry errors?

²¹ In the matter of Federal State Joint Board on Universal Service, Universal Service Contribution Methodology, A National Broadband Plan for our Future; WC Docket No. 96-45; WC Docket No. 06-122; WC Docket No. 09-51 released October 15, 2019. This is a "hybrid" proposal, as the letter also advocates for the revenue-based mechanism be maintained for business services, and for the contribution base be expanded to include a broader class of services, including Broadband Internet Access Service, suggesting that the FCC could use its permissive authority under Section 254(d) to expand the contribution base.

6. Would implementing a per-access line charge be regressive?
7. What is effect of the end user customer not knowing exactly how much is being charged to support each program and the user fee?
8. What other considerations, not set out in prior questions, should be considered? Why?

The precise issues to be addressed and the process for addressing those issues will be set forth in an Assigned Commissioner's Scoping Memo.

3. Preliminary Scoping Memo

This OIR will be conducted in accordance with Article 6 of the Commission's Rules of Practice and Procedure, "Rulemaking."²² As required by Rule 7.1(d), this OIR will include a preliminary scoping memo. The preliminarily determined category of this proceeding as well as the need for hearing are discussed below. The preliminary scope of issues in the proceeding will be determined by the scoping memo and may be changed by the Assigned Commissioner or ALJ. (*See* Commission's Rules of Practice and Procedure Rule 7.3.)

3.1. Categorization; *Ex Parte* Communications; Need for Hearing

The proceeding category is preliminarily determined to be ratesetting.

Accordingly, *ex parte* communications with the Assigned Commissioner, other Commissioners, their advisors and the Assigned Administrative Law Judge (ALJ) are permitted only as described at Public Utilities Code § 1701.3(h) and Article 8 of the Rules.

²² All references to "Rules" are to the Commission's Rules of Practice and Procedure unless otherwise indicated.

We are also required to preliminarily determine if hearings are necessary.
We preliminarily determine that hearings may be necessary.

3.2. Preliminary Schedule

The schedule is:

SCHEDULE

EVENT	DATE
Comments on OIR filed and served	30 days from OIR adoption
Reply comments on OIR filed and served	April 2021
Prehearing Conference Statement	TBD
Prehearing conference	TBD
Scoping memo	TBD
Opening Comments filed and served	TBD
Reply comments filed and served	TBD
Proposed Decision	No later than 90 days from reply comments
Commission Decision	No sooner than 30 days after the Proposed Decision TBD

The prehearing conference (PHC) will be held for the purposes of (1) taking appearances, (2) discussing schedule and process, and (3) informing the scoping memo.

The Assigned Commissioner or the assigned ALJ may change the schedule to promote efficient and fair administration of this proceeding. The schedule for the remainder of the proceeding will be adopted in the Assigned Commissioner's Scoping Memo.

It is the Commission's intent to complete this proceeding within 18 months of the date this OIR decision is adopted. This deadline may be extended by order of the Commission. (Public Utilities Code § 1701.5(a).)

If there are any workshops in this proceeding, notice of such workshops will be posted on the Commission's Daily Calendar to inform the public that a decision-maker or an advisor may be present at those meetings or workshops. Parties shall check the Daily Calendar regularly for such notices.

4. Respondents

Carriers listed in Attachment A are named as respondents to this proceeding.

5. Service of OIR

This OIR shall be served on all respondents.

In addition, in the interest of broad notice, this OIR will be served on the following:

- A. All communications companies listed in the Commission's Utility Contact Information System that report revenue and remit surcharges to TUFFS.
- B. The official service lists for the following proceedings:
 - Order Instituting Rulemaking to Establish A Framework and Processes for Assessing the Affordability of Utility Service, R.18-07-006.
 - Order Instituting Rulemaking to Update the California Universal Telephone Service (California LifeLine) Program, R.20-02-008.
 - Order Instituting Rulemaking Regarding Revisions to the California Advanced Services Fund, R.20-08-021.
 - Order Instituting Rulemaking into the Review of the California High Cost Fund-A Program, R.11-11-007.
- C. State and local agencies:
 - League of California Cities
 - California State Association of Counties
 - Rural County Representatives of California

D. Advocacy organizations:

- Consumer Reports
- National Consumer Law Center
- The Utility Reform Network
- The Greenlining Institute
- The Center for Accessible Technology

Service of the OIR does not confer party status or place any person who has received such service on the Official Service List for this proceeding. Instructions for obtaining party status or being placed on the official service list are given below.

6. Filing and Service of Comments and Other Documents

Filing and service of comments and other documents in the proceeding are governed by the Commission's Rules of Practice and Procedure.

Parties are directed to submit their prepared testimony, and any exhibits that are offered in evidence, as "supporting documents" using the Electronic Filing System on the Commission's website at <http://www.cpuc.ca.gov/PUC/efiling>. All other exhibits that have been marked for identification shall be submitted by no later than three business days from the conclusion of evidentiary hearings, if applicable.

7. Addition to Official Service List

Addition to the official service list is governed by Rule 1.9(f) of the Commission's Rules of Practice and Procedure.

Any person will be added to the "Information Only" category of the official service list upon request, for electronic service of all documents in the proceeding, and should do so promptly in order to ensure timely service of comments and other documents and correspondence in the proceeding. (See Rule 1.9(f).) The request must be sent to the Process Office by e-mail

(process_office@cpuc.ca.gov) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California 94102). Please include the Docket Number of this rulemaking in the request.

Persons who file responsive comments thereby become parties to the proceeding (*see* Rule 1.4(a)(2)) and will be added to the “Parties” category of the official service list upon such filing. *In order to assure service of comments and other documents and correspondence in advance of obtaining party status, persons should promptly request addition to the “Information Only” category as described above; they will be removed from that category upon obtaining party status.*

8. Subscription Service

Persons may monitor the proceeding by subscribing to receive electronic copies of documents in this proceeding that are published on the Commission’s website. There is no need to be on the official service list in order to use the subscription service. Instructions for enrolling in the subscription service are available on the Commission’s website at <http://subscribecpuc.cpuc.ca.gov/>.

9. Intervenor Compensation

Intervenor Compensation is permitted in this proceeding.

Pursuant to Pub. Util. Code § 1804(a)(1), a customer who intends to seek an award of compensation must file and serve a notice of intent to claim compensation within 30 days after the prehearing conference. Parties new to participating in Commission proceedings may contact the Commission’s Public Advisor.

10. Public Advisor

Any person or entity interested in participating in this rulemaking who is unfamiliar with the Commission’s procedures should contact the Commission’s Public Advisor in San Francisco at (415) 703-2074 or (866) 849-8390 or e-mail public.advisor@cpuc.ca.gov. The TTY number is (866) 836-7825.

11. Public Outreach

Public Utilities Code § 1711(a) states:

Where feasible and appropriate, except for adjudication cases, before determining the scope of the proceeding, the commission shall seek the participation of those who are likely to be affected, including those who are likely to benefit from, and those who are potentially subject to, a decision in that proceeding. The commission shall demonstrate its efforts to comply with this section in the text of the initial scoping memo of the proceeding.

Public Outreach will be described in the Scoping Memo

O R D E R

IT IS ORDERED that:

1. This Order Instituting Rulemaking is adopted pursuant to Rule 6.1 of the Commission's Rules of Practice and Procedure.
2. The preliminary categorization is ratesetting rulemaking.
3. The Respondents listed in Attachment A shall be parties to this proceeding.
4. Respondents shall, and any other person may, file comments responding to this Order Instituting Rulemaking not later than 30 days after it is adopted.
5. The preliminary determination is that hearings may be needed.
6. The preliminary scope of issues is as stated above in Section 2.
7. A telephonic prehearing conference will be set by ruling.
8. The proceeding schedule will be adopted in the Assigned Commissioner's Scoping Memo.
9. The Executive Director will cause this Order Instituting Rulemaking to be served on all communications companies listed in the Commission's

Utility Contact Information System that report revenue and remit surcharges to the Telecommunications & User Fees Filing System and Respondents listed in Attachment A.

10. The Executive Director will also cause this Order Instituting Rulemaking to be served on Parties to existing Rulemakings and the following agencies and organizations:

- Order Instituting Rulemaking to Establish A Framework and Processes for Assessing the Affordability of Utility Service, R.18-07-006.
- Order Instituting Rulemaking to Update the California Universal Telephone Service (California LifeLine) Program, R. 20-02-008.
- Order Instituting Rulemaking Regarding Revisions to the California Advanced Services Fund, R.20-08-021.
- Order Instituting Rulemaking into the Review of the California High Cost Fund-A Program, R.11-11-007.
- League of California Cities
- California State Association of Counties
- Rural County Representatives of California
- Consumer Reports
- National Consumer Law Center
- The Utility Reform Network
- The Greenlining Institute
- The Center for Accessible Technology

11. Any party that expects to claim intervenor compensation for its participation in this Rulemaking must file its notice of intent to claim intervenor compensation in accordance with Rule 17.1(a)(2).).

This order is effective today.

Dated _____, at San Francisco, California.

Attachment A

List of Respondents

AT&T California
Frontier Telecommunications Company of California Inc.
Citizens Telecommunications Co. of Ca.
Frontier Communications of the SW Inc.
Time Warner Cable Information Services (California) LLC
Charter Fiberlink CA-CCO, LLC
Charter Fiberlink CA-CCO, LLC and Time Warner Cable Information
Services (California), LLC
Sonic Telecom, LLC
Independent Small Local Exchange Carriers
Calaveras Telephone Company
Cal-Ore Telephone Company
Ducor Telephone Company
Foresthill Telephone Company
Happy Valley Telephone Company
Hornitos Telephone Company
Kerman Telephone Company
Pinnacles Telephone Company
The Ponderosa Telephone Company
Sierra Telephone Company
Siskiyou Telephone Company
Volcano Telephone Company
Winterhaven Telephone Company
Cox California Telecom LLC
Cox Communications
Consolidated Communications of California Company
Comcast Phone of California, LLC
Crown Castle Fiber LLC
Velocity Communications, Inc.
ExteNet Systems, Inc. & ExteNet Systems (California), LLC
SureWest Telephone
Nexus Communications, Inc.
Global Connection Inc. of America dba: Stand Up Wireless

Boomerang Wireless, LLC and AmeriMex Communications Corp.dba
TruConnect Communications, Inc.
Tracfone Wireless, Inc.
i-Wireless LLC
American Broadband and Telecommunications Company
Q Link Wireless LLC
Blue Jay Wireless, LLC
MCImetro Access Transmission Services dba VERIZON California
Pacific Bell Telephone Company
Nexus Communications, Inc. d/b/a ReachOut Wireless
Telrite Corporation dba Life Wireless
Sprint Spectrum L.P. and Assurance Wireless USA, L.P.
TC Telephone LLC
T-Mobile West LLC dba T-Mobile
Sprint/Nextel
New Cingular Wireless PCS, LLC
Los Angeles Smsa Limited Partnership
Wirelessco, LP
GTE Mobilnet of CA., Ltd. Partnership
U.S. Telepacific Corp
Cellco Partnership
Granite Telecommunications, LLC
Sacramento Valley Ltd. Partnership
TWC Digital Phone, LLC
Consumer Cellular, Incorporated
RingCentral, Inc.
MCI Communications Services
Freedom Telecommunications, LLC
Fresno MSA Ltd. Partnership