

Decision 25-11-026

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

Application of Pilot Services, LLC for
Registration as a Telephone Corporation
pursuant to Public Utilities Code Section 1013.

Application 25-08-014

**DECISION GRANTING PILOT SERVICES, LLC
A REGISTRATION LICENSE AS A TELEPHONE CORPORATION
PURSUANT TO PUBLIC UTILITIES CODE SECTION 1013**

On August 18, 2025, Pilot Services, LLC (Pilot), an Illinois Limited Liability Company, filed an application for registration as a telephone corporation pursuant to Public Utilities (Pub. Util.) Code Section 1013 (registration license) to provide non-facilities-based fixed interconnected Voice over Internet Protocol (VoIP) services throughout California. This application was filed pursuant to the simplified registration (also known as 1013 registration) process adopted in Decision (D.) 97-06-107, as modified by D.10-09-017, D.11-09-026, and D.24-11-003. Pilot was qualified to use the 1013 registration process, and demonstrated compliance with the filing requirements, namely:

1. Pilot provided a Certificate of Registration as a Domestic Limited Liability Company from the California Secretary of State.
2. Pilot attested “true” to Questions 7 and 8a of the Application for Registration as a Telephone Corporation pursuant to Pub. Util. Code Section 1013 regarding fitness requirements of each officer, director, partner, and/or

owner and demonstrated having the required expertise to operate as a provider of non-facilities-based fixed interconnected VoIP services.

3. Pilot demonstrated a minimum of \$25,000 in assets reasonably liquid and available to meet the firm's first year expenses, including an additional \$25,000 for deposits which may be required by local exchange carriers or interexchange carriers as a provider of non-facilities-based fixed interconnected VoIP services.
4. Pilot attested that it would obtain a performance bond in the amount of \$25,000 for the first year and that the performance bond will be executed within 30 days after the effective date of the issuance of a registration license and submitted to the California Public Utilities Commission's Communications Division as a Tier 1 advice letter.¹
5. Pilot, as a provider of non-facilities-based fixed interconnected VoIP services will not be constructing any new facilities to provide services for which it seeks authority. Thus, granting this application will have no adverse impact on the environment that requires the filing of a Certificate of Public Convenience and Necessity (CPCN). Before it constructs new facilities, Pilot must file for additional authority via the CPCN application process pursuant to Pub. Util. Code Section 1001 and submit to any necessary California Environmental Quality Act (CEQA) review.
6. Pilot requested an exemption from tariff requirements and agreed to observe the consumer protection rules adopted in D.98-08-031 and D.24-11-003.

No protests to the application were filed. Therefore, pursuant to the authority granted to the Executive Director by D.97-08-050, Pilot should be granted a registration license to provide this service.

¹ D.24-11-003, Ordering Paragraph 5

This is an uncontested matter in which the decision grants the relief requested. Accordingly, pursuant to Pub. Util. Code Section 311(g)(2) and Rule 14.6(c)(2) of the Commission's Rules of Practice and Procedure, we are waiving the otherwise applicable 30-day period for public review and comment.

Findings of Fact

1. Pilot filed its application on August 18, 2025, and appeared on the Commission's Daily Calendar on September 02, 2025.
2. Pilot complied with the requirements of the registration process adopted in D.97-06-017, as modified by D.10-19-017, D.11-09-026, and D.24-11-003.
3. No timely protests to the application were filed.
4. Pilot will not be constructing new facilities; therefore, granting this application will have no adverse environmental impact that would require the filing of a CPCN application. Before it can construct new facilities, Pilot must file for additional authority via the CPCN application process pursuant to Pub. Util. Code Section 1001 and submit to any necessary CEQA review.
5. Pilot requested an exemption from tariffing requirements and agreed to observe the consumer protection rules adopted in D.98-08-031 and D.24-11-003.

Conclusions of Law

1. The Executive Director is authorized to sign, on behalf of the Commission, a decision granting a registration as a Telephone Corporation pursuant to Public Utilities Code Section 1013 (registration license) to providers of resold and non-facilities-based competitive local exchange services, interexchange services, and fixed interconnected VoIP services qualified to use the

registration process adopted in D.97-06-107, as modified by D.10-09-017, D.11-09-026, and D.24-11-003, and which successfully complete the process.

2. Pilot has the financial ability to provide the proposed service.
3. Pilot demonstrated the required expertise to operate as a provider of non-facilities-based fixed interconnected Voice over Internet Protocol (VoIP) services in California.
4. Pilot, once granted a registration license, should be subject to the applicable Commission rules, decisions, General Orders, and statutes that pertain to California public utilities.
5. Pilot should be granted an exemption from the requirement to file tariffs pursuant to D.98-08-031 and D.24-11-003.

O R D E R

IT IS ORDERED that:

1. A registration license is granted to Pilot Services, LLC to provide non-facilities-based fixed interconnected VoIP service throughout California, to the extent authorized by Decision (D.) 97-06-107, as modified by D.10-09-017, D.11-09-026, and D.24-11-003, subject to the conditions set forth in the appendices of these decisions.
2. The registration license granted, and the authority for Pilot Services, LLC to render service to customers under the rates, charges, and rules authorized, will expire if not exercised, by offering or actively providing service within 12 months of the effective date of this decision. Pilot Services, LLC is responsible for seeking approval for an extension of time to comply with this decision pursuant to Rules of Practice and Procedure Rule 16.6.

3. Pilot Services, LLC is assigned utility identification number U-7509-C and is responsible for using this as its corporation identification number in the caption of all original filings with this Commission, in the title of other pleadings filed in existing cases, and informal submissions to the Commission.
4. Pilot Services, LLC must submit a written acceptance of the registration license granted to the California Public Utilities Commission's Director of the Communications Division, in writing with reference to this decision number, by email to cdcompliance@cpuc.ca.gov, within 30 days of the effective date of this decision.
5. Pilot Services, LLC is subject to California public purpose program surcharges (surcharges) and user fees; and is responsible for timely reporting and remittance of surcharges and user fees using the California Public Utilities Commission's proprietary Telecommunications and User Fee Filing System (TUFFS). Pursuant to D.24-11-003, Interconnected VoIP service providers operating in California are subject to User Fees, starting on July 1, 2025. Refer to Attachment A for additional information on surcharges and user fees requirements.
6. Pilot Services, LLC must submit a Tier 1 advice letter containing a copy of the registration license holder's executed performance bond in accordance with Decision (D.) 10-09-017 and D.11-09-026, as modified by D.24-11-003, to the California Public Utilities Commission (CPUC) Communications Division within thirty (30) days of the effective date of this decision. Pilot Services, LLC is responsible for seeking written approval for additional time to submit a copy of the initial performance bond from the Communications Division within 30 days of the effective date of this decision.

7. Pilot Services, LLC is responsible for ensuring that the performance bond is active for all periods of its operation and complies with the annual performance bond filing on or before March 31 of each year in accordance with Ordering Paragraph 6 of Decision 10-09-017, as modified by D.24-11-003. Refer to Attachment A for additional information on the performance bond requirements.
8. Pilot Services, LLC must provide the name, address, e-mail address, and telephone number of its designated primary regulatory/official contact person to the California Public Utilities Commission's Communications Division within five (5) days of written acceptance of its registration license. Refer to Attachment A for additional information related to updating contact information.
9. Pilot Services, LLC must provide the name, address, e-mail address, and telephone number of its designated contact person for purposes of resolving consumer complaints to the California Public Utilities Commission's Consumer Affairs Branch within five (5) days of written acceptance of its registration license. Refer to Attachment A for additional information related to updating contact information.
10. Pilot Services, LLC must submit its compliance with Pub. Util. Code Section 708, Employee Identification Cards, to the California Public Utilities Commission's Director of the Communications Division, in writing, by emailing to cdcompliance@cpuc.ca.gov within 60 days of the effective date of this decision.
11. Pilot Services, LLC is responsible for submitting an annual report in accordance with General Order 104-A to the California Public Utilities

Commission's Director of the Communications Division, by e-mail to cdcompliance@cpuc.ca.gov, no later than March 31 of the year following the calendar year for which the annual report is submitted. Refer to Attachment B for additional information on annual report requirements.

12. Pilot Services, LLC is responsible for submitting its annual affiliate transaction report in accordance with Decision (D.) 93-02-019 and D.24-11-003, to the California Public Utilities Commission's Director of the Communications Division, by e-mail to cdcompliance@cpuc.ca.gov, no later than May 1 of the year following the calendar year for which the annual affiliate transaction report is submitted. Refer to Attachment C for additional information on annual affiliate transaction report requirements.
13. Pilot Services, LLC is subject to all the current requirements applicable to telephone corporations included in Attachments A, B, and C to this decision; all Consumer Protection Rules contained in General Order 168; and all applicable California Public Utilities Commission rules, decisions, General Orders, and statutes that pertain to California public utilities on an ongoing basis.
14. Pilot Services, LLC is exempt from the requirement to file tariffs pursuant to Decision 98-08-031 and D.24-11-003.
15. Application A.25-08-014 is closed.

This order is effective today.

Dated November 21, 2025, at San Francisco, California.

CD/RO1/SHB

/s/ RACHEL PETERSON

RACHEL PETERSON

Executive Director

ATTACHMENT A

**TELEPHONE CORPORATION (CARRIER) REQUIREMENTS APPLICABLE
TO PROVIDERS OF RESOLD COMPETITIVE LOCAL EXCHANGE
SERVICES, RESOLD INTEREXCHANGE SERVICES, AND NON-
FACILITIES-BASED FIXED INTERCONNECTED VOICE OVER INTERNET
PROTOCOL (VOIP) SERVICES**

1. Carrier is subject to all the current applicable California Public Utilities Commission (CPUC or Commission) rules, decisions, General Orders, and statutes that pertain to California public utilities and telephone corporations on an ongoing basis.

2. Carrier is responsible for rendering services to customers under the rates, charges and rules authorized by the Commission within 12 months from the date of the order. Rendering services may include but are not limited to offering and/or actively providing services to its customers on a wholesale and/or resale basis.

3. Carrier is responsible for keeping all contact information up to date with the Commission. Changes to its primary regulatory and/or complaint contact information must be updated in the Commission's TUFFS portal within 30 days of any change or at least annually by June 1 of each calendar year. Additionally, information on accessing TUFFS is available from the CPUC website:

<https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/telecommunications-surcharges-and-user-fees>

4. Carrier is subject to California public purpose program surcharges and user fees. Pursuant to Decision (D.) 22-10-021, as modified by D.24-11-003, all telephone corporations operating in California must assess, collect, report and

remit public purpose program surcharges based on the number of active access lines. For definition of access line, see Section 5.2.2 of D.22-10-021. The surcharge funds the following California public purpose programs:

- a. The Universal Lifeline Telephone Service Trust
Administrative Committee Fund (Pub. Util. Code § 277);
- b. The California Relay Service and Communications Devices
Fund (Pub. Util. Code § 2881; D.98-12-073);
- c. The California High Cost Fund-A (Pub. Util. Code § 275.6);
D.96-10-066, at 3-4, App. B, Rule 1.C);
- d. The California High Cost Fund-B (Pub. Util. Code § 276.5),
D.96-10-066, at 191, App. B, Rule 6.F.; D.07-12-054);
- e. The California Advanced Services Fund (Pub. Util. Code
§ 281; D.07-12-054); and
- f. The California Teleconnect Fund (Pub. Util. Code § 280;
D.96-10-066, at 88, App. B, Rule 8.G).

User Fees must be assessed based on intrastate telecommunications revenues. The User Fee funds the CPUC's annual operating budget for regulating the telecommunications corporations under its jurisdiction (Pub. Util. Code §§ 431-435). Pursuant to D.24-11-003, interconnected VoIP service providers operating in California are subject to User Fees, starting on July 1, 2025.

5. Carrier is responsible for obtaining guidance and directive from the Commission's Communications Division for timely reporting and remitting of public purpose program surcharges and the user fees through the Commission's proprietary Telecommunications and User Fee Filing System (TUFFS). Additional information about telecommunications surcharges and user fees is

available from the CPUC website: <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/telecommunications-surcharges-and-user-fees>.

6. Carrier is responsible for timely and accurately reporting its number of access lines and remitting the resulting public purpose program surcharges through TUFFS even if there is zero (0) access line to report and zero (0) resulting surcharges to remit. Carriers that report and/or remit surcharge funds after the due date will be charged interest equal to an annual rate of ten percent (10%). Send an email to Telcosurcharge@cpuc.ca.gov for questions related to surcharges and access to TUFFS. Current and historical surcharge rates is available from the CPUC website: <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/telecommunications-surcharges-and-user-fees/surcharge-rates>.

7. Carrier is responsible for timely and accurately reporting and remitting the user fees based on a standard user fee remittance rate applied to the gross intrastate revenue or an annual minimum user fee of \$100, whichever is greater. The user fee remittance rate is determined annually by the Commission and posted on the Commission's webpage. The reporting and remittance of user fees must be submitted through TUFFS within 15 days after the end of each calendar quarter (March 31, June 30 and September 30, and December 31) or the January 15 due date for those paying the annual minimum user fee of \$100. TUFFS will automatically adjust the minimum user fee amount due to \$100 when the annual gross intrastate revenue is zero (\$0) or less than the annual minimum user fee of \$100. Under Pub. Util. Code Section 405, carriers that are in default of reporting and submitting user fees more than 30 days after the quarterly user fee payment due dates of April 15, July 15, October 15, and January 15, or more than 30 days after the January 15 due date for those utilities paying the annual minimum user

fee of \$100, will be subject to automatic penalties including suspension or revocation of their authority to operate in California. Pursuant to D.24-11-003, Interconnected VoIP service providers operating in California are subject to User Fees, starting on July 1, 2025. Send an email to userfees@cpuc.ca.gov for questions related to user fees. Current and historical user fee rates is available from the CPUC website: <https://www.cpus.ca.gov/industries-and-topics/internet-and-phone/telecommunications-surcharges-and-user-fees/user-fee-rates>.

8. In compliance with Resolution T-16901, December 2, 2004, Carrier is responsible for checking the joint tariff, if applicable, for public purpose program surcharges and user fees filed by Pacific Bell (dba AT&T California) and apply the current public purpose program surcharges and user fees amounts in that joint tariff on end-user bills until further revised.

9. Carrier is responsible for ensuring that its tariff filings reflect all surcharges and fees to which it is subject to, as identified above.

10. If Carrier is a provider of interexchange services, competitive local exchange services, and/or fixed interconnected VoIP services, the effectiveness of its future nondominant carrier tariffs, if applicable, is subject to the requirement of General Order 96-B and the Telecommunications Industry Rules (D.07-09-019).

11. Carrier is responsible for submitting a copy of its complete tariff in use to the California Public Utilities Commission's Director of the Communications Division, by email to cdcompliance@cpuc.ca.gov, in compliance with Pub. Util. Code § 489(a), no later than February 15 of each year. Additional information is available from the CPUC website: <https://www.cpus.ca.gov/industries-and-topics/internet-and-phone/carrier-reporting-requirements/tariff-filing-requirements>.

12. Carrier is responsible for obtaining a performance bond equal to \$25,000. The performance bond must be a continuous bond (i.e., there is no termination date on the bond) issued by a corporate surety company authorized to transact surety business in California, and the Commission must be listed as the obligee on the bond. Carrier must submit a Tier 1 advice letter containing a copy of the registration license holder's executed performance bond in accordance with D. 10-09-017, D.11-09-026, and as modified by D.24-11-003 to the California Public Utilities Commission's Communications Division within thirty (30) days of the effective date of this decision. Requests for an extension of time to submit the initial performance bond must be submitted to the Director of the Communications Division via email at cdcompliance@cpuc.ca.gov within 30 days of the effective date of this decision using the performance bond filing extension form is available from the CPUC website: <https://www.cpus.ca.gov/industries-and-topics/internet-and-phone/carrier-reporting-requirements/performance-bond-requirements>.

13. Carrier is responsible for submitting a Tier 1 advice letter to the Director of the Communications Division containing a copy of the registration license holder's executed performance bond at least annually and not later than March 31 in accordance with Ordering Paragraph 6 of D. 10-09-017, as modified by D.24-11-003. Carrier must not allow the performance bond to lapse during any period of its operation. Pursuant to Ordering Paragraph 9 of D. 10-09-017, the Communications Division must prepare for Commission consideration a resolution revoking the registration license of any registration license holder that is more than 120 days late in providing the Director of the Communications Division with a copy of its executed performance bond and that has not been

granted an extension of time by the Communications Division. Additional information is available from the CPUC website:

<https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/carrier-reporting-requirements/performance-bond-requirements>.

14. Carrier is responsible for ensuring that its employees comply with the provisions of Pub. Util. Code § 2889.5 regarding solicitation of customers.

15. Carrier is exempt from Rule 3.1(b) of the Commission's Rules of Practice and Procedure.

16. Carrier is exempt from Pub. Util. Code §§ 816-830.

17. Carrier is exempt from Pub. Util. Code § 851 when the transfer or encumbrance serves to secure debt.

18. Carrier is responsible for keeping its books and records in accordance with the Generally Accepted Accounting Principles. In the event the registration license holder's books and records are required for inspection by the Commission or its staff, it must either produce such records at the Commission's offices or reimburse the Commission for the reasonable costs incurred in having Commission staff travel to its office.

19. If Carrier is 90 days or more late in complying with its reporting obligations to the Commission including but not limited to filing its annual reports (e.g., Operations and Financials, and Affiliated Transaction Reports), submitting performance bond, reporting and remitting surcharges and user fees; and has not received written permission from the Commission or Communications Division to file or remit late, the Communications Division shall issue a citation pursuant to Resolution T-17601. Failure to comply with the issued citation or timely appeal the citation may result in a revocation of the

carrier's operating authority and/or a referral to the Commission's Consumer Protection and Enforcement Division (CPED) for enforcement action, which could result in additional fines, penalties, or other sanctions.

20. If Carrier is planning to discontinue service or to file for bankruptcy, it must contact the Director of the Communications Division immediately at cdcompliance@cpuc.ca.gov. Carrier should ask for instructions in its particular circumstances. The Commission's rules are designed to ensure that telecommunications customers receive adequate notice and are minimally inconvenienced. Carrier's compliance is necessary so that it is not penalized for failure to follow Commission rules.

21. If Carrier requested and granted confidential treatment of the financial portions of its application, those materials will remain under seal for one year from the date of this decision. If it wishes to continue the seal on those materials beyond the one-year period, it must make a formal request no later than thirty days prior to the expiration of the year explaining the reasons why it believes such an extension is necessary.

(END OF ATTACHMENT A)

ATTACHMENT B

ANNUAL REPORT

In addition to the annual reports requirement pursuant to General Order 104-A, Telephone Corporations must submit the following information electronically to the Commission's Communications Division using the Annual Operational and Financial Information Report Form² via email to cdcompliance@cpuc.ca.gov no later than March 31st of the year following the calendar year for which the annual report is submitted.

Failure to submit this information on time may result in a penalty as provided for in Pub. Util. Code §§ 2107 and 2108.

Required information:

1. Exact legal name and Utility ID number of the reporting utility.
2. Utility Address.
3. Name, title, address, and telephone number of the person to be contacted concerning the reported information.
4. Name and title of the officer having custody of the general books of account and the address of the office where such books are kept.
5. Type of organization (*e.g.*, corporation, partnership, sole proprietorship, etc.).

If incorporated, specify:

- a. Date of filing articles of incorporation with the Secretary of State.
- b. State in which incorporated.
6. Number and date of the Commission decision granting the Certificate of Public Convenience and Necessity.
7. Date operations began.

² An Annual Operations and Financial Information Report form (in PDF format) has been developed to help facilitate the submission of this reporting obligation and available from the CPUC website: <https://www.cpsc.ca.gov/-/media/cpsc-website/divisions/communications-division/documents/licensing-compliance/annual-reporting-requirements/aropfi.pdf>

8. Description of other business activities in which the utility is engaged.
9. List of all affiliated companies and their relationship to the utility. State if affiliate is a:
 - a. Regulated public utility.
 - b. Publicly held corporation.
10. Balance sheet as of December 31st of the year for which information is submitted.
11. Income statement for California operations for the calendar year for which information is submitted.

Additional information about the reporting requirements is available from the CPUC website: <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/carrier-reporting-requirements/annual-report-forms>. For any questions concerning this report, please send an email to cdcompliance@cpuc.ca.gov with a subject line that includes: "CD Annual Reports."

(END OF ATTACHMENT B)

ATTACHMENT C

CALENDAR YEAR AFFILIATE TRANSACTION REPORT

Telephone Corporations must submit the following information electronically to the Commission's Communications Division using the Annual Affiliate Transaction Report Form³ via email to cdcompliance@cpuc.ca.gov no later than May 1st of the year following the calendar year for which the annual affiliate transaction report is submitted.

Failure to submit this information on time may result in a penalty as provided for in Pub. Util. Code §§ 2107 and 2108.

1. Each utility shall list and provide the following information for each affiliated entity and regulated subsidiary that the utility had during the period covered by the annual Affiliate Transaction report.
 - Form of organization (e.g., corporation, partnership, joint venture, strategic alliance, etc.);
 - Brief description of business activities engaged in;
 - Relationship to the utility (e.g., controlling corporation, subsidiary, regulated subsidiary, affiliate);
 - Ownership of the utility (including type and percent ownership);
 - Corporate officers.
2. The utility shall prepare and submit a corporate organizational chart showing any and all corporate relationships between the utility and its affiliated entities and regulated subsidiaries listed in item 1 above. The chart should have the controlling corporation (if any) at the top of the chart; the utility and any subsidiaries and/or affiliates of the controlling corporation in the middle levels of the chart and all secondary subsidiaries and affiliates (e.g., a

³ An Annual Affiliate Report form (in PDF format) has been developed to help facilitate the submission of this reporting obligation and available from the CPUC website: https://www.cpus.ca.gov/-/media/cpus-website/divisions/communications-division/documents/licensing-compliance/annual-reporting-requirements/annual-affiliate-transaction-report-form_.pdf.

subsidiary that in turn is owned by another subsidiary and/or affiliate) in the lower levels. Any regulated subsidiary should be clearly noted.

3. For a utility that has entities that are classified as “controlling corporations” of the competitive utility, the utility must only report under the requirements of item 1 and item 2 above for any affiliated entity that either (a) is a public utility or (b) transacts any business with the utility filing the annual report excluding the provision of tariffed services.
4. Each annual report must be signed by a corporate officer of the utility stating under penalty of perjury under the laws of the State of California (CCP 2015.5) that the annual report is complete and accurate with no material omissions.
5. Any required information, documents, or other materials that a utility is unable to provide must be reasonably described and the reasons they cannot be obtained, as well as the efforts expended to obtain them, must be set forth in the utility’s annual Affiliate Transaction Report and verified in accordance with Section 1-F of Decision 93-02-019.
6. Utilities that do not have affiliated entities must file, in lieu of the annual affiliate transaction report, an annual statement to the Commission stating the utility had no affiliated entities during the report period. This statement must be signed by a corporate officer of the utility stating under penalty of perjury under the laws of the State of California (CCP 2015.5) that the annual report is complete and accurate with no material omissions.

Additional information about the reporting requirements is available from the CPUC website: <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/carrier-reporting-requirements/annual-report-forms>. For any questions concerning this report, please send an e-mail to cdcompliance@cpuc.ca.gov with the subject line that includes: “CD Annual Reports.”

(END OF ATTACHMENT C)