

ALJ/SMW/cg7

Date of Issuance 03/25/2026

Decision 26-03-025 March 19, 2026

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

Application of COMBINED PUBLIC  
COMMUNICATIONS, LLC for  
Registration as a Telephone Corporation  
pursuant to Public Utilities code Section  
1013.

Application 25-02-008

**DECISION GRANTING COMBINED PUBLIC COMMUNICATIONS LLC A  
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO PROVIDE  
RESOLD NON-FACILITIES-BASED INTEREXCHANGE SERVICES**

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**DECISION GRANTING COMBINED PUBLIC COMMUNICATIONS LLC A  
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO PROVIDE  
RESOLD NON-FACILITIES-BASED INTEREXCHANGE SERVICES**

**Summary**

Pursuant to Public Utilities Code Section 1001, the Commission grants Combined Public Communications, LLC a Certificate of Public Convenience and Necessity to provide resold non-facilities-based interexchange services subject to the terms and conditions set forth in the Ordering Paragraphs. Although this application was filed pursuant to Public Utilities Code Section 1013, an expedited, ministerial registration process, the Commission determined that it did not qualify for registration, and the resulting assignment to an Administrative Law Judge removed it from the registration track. The Commission, therefore, evaluated it as a Certificate of Public Convenience and Necessity under Public Utilities Code Section 1001.

Application 25-02-008 is closed.

**1. Background**

On February 19, 2025, Combined Public Communications, LLC (Combined), a Delaware limited liability company authorized to do business in California, filed Application (A.) 25-02-008 for registration pursuant to Public Utilities (Pub. Util.) Code Section 1013 to provide resold non-facilities based interexchange service in California.

On April 25, 2025, after reviewing the current proceeding, the California Public Utilities Commission (Commission) converted this registration to a request for Certificate of Public Convenience and Necessity (CPCN) pursuant to Pub. Util. Code Section 1001 because Combined did not meet the requirements to

register with the Commission pursuant to Pub. Util. Code Section 1013.<sup>1</sup>

Specifically, Combined failed to note in A.25-02-008 that it had entered into a Consent Decree with the Federal Communications Commission (FCC), which terminated an FCC investigation into whether Combined violated the FCC's rules.

The Commission has not received any responses or protests to the application.

On June 19, 2025, the assigned Administrative Law Judge (ALJ) held a Preliminary Hearing Conference (PHC) to determine the scope and schedule of A.25-02-008. Combined failed to appear at the PHC. Accordingly, the ALJ posed questions requiring Combined's response. Specifically, the ALJ issued three Rulings Requiring Response to Inquiries on June 19, June 27, and July 25, 2025, to which Combined responded on June 24, July 7, and July 31, 2025, respectively.

The assigned Commissioner's Scoping Memo and Ruling (Scoping Memo) was filed and served on August 19, 2025.

On November 10, 2025, the ALJ held a status conference and provided options for Combined to resolve its failure to declare an exception to the certification requirements, pursuant to D.13-05-035, Ordering Paragraph 14 and D.24-11-003, including an option for Combined to file a motion stipulating to its violation of D.13-05-035, D.24-11-003, and Rule 1.1, and proposing a penalty amount.

On December 22, 2025, Combined filed a *Motion to Stipulate Regarding Rule 1.1 Disclosure Issue* (Motion to Stipulate).

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<sup>1</sup> While this application was filed pursuant to Pub. Util. Code Section 1013, an expedited and ministerial registration process, the determination didn't qualify for the registration process resulting in assignment to an Administrative Law Judge and removal from the registration track. It has therefore been evaluated as a CPCN under Pub. Util. Code Section 1001.

Combined's principal place of business is 100 Aqua Drive, Cold Spring, Kentucky 41076.

**2. Submission Date**

This matter was submitted on January 13, 2026, upon the issuance of the status conference transcript.

**3. Issues Before the Commission**

The issues in this proceeding are as follows:

1. Whether Combined meets all the Commission requirements for granting CPCN.

**4. Jurisdiction**

The Commission has broad jurisdiction over "public utilities," as defined in Pub. Util. Code Section 216.<sup>2</sup> California's Constitution extends the Commission's jurisdiction to companies engaged in "the transmission of telephone and telegraph messages," which includes both public utility services and facilities.<sup>3</sup> The Commission classifies entities providing two-way voice communications service for compensation within California as "telephone corporations" and regulates them as public utilities.<sup>4</sup>

As part of its regulatory authority over "telephone corporations," the Commission authorizes certificates of public convenience and necessity to "telephone corporations" seeking to construct a "line, plant, or system, or any

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<sup>2</sup> Pub. Util. Code §§ 216, 234.

<sup>3</sup> See D.20-07-011 at 14-15; Cal. Const., art. XII, §§ 1-6; Pub. Util. Code § 701.

<sup>4</sup> Pub. Util. Code §§ 216, 233, 234; D.22-10-021 at 68. Telephone corporations are required to file annual affiliate transaction reports, and pay surcharges and user fees

extension thereof” in California.<sup>5</sup> Pub. Util. Code Section 233 defines a “telephone line” to include “all conduits, ducts, poles, wires, cables, instruments, and appliances, and other real estate, fixtures, and personal property owned or controlled, operated, or managed in connection with or to facilitate communication by telephone, whether such communication is had with or without the use of transmission wires.” This includes services delivered over any technology, including, but not limited to, traditional copper lines, coaxial cable, fiber optic cable, and mobile or fixed wireless radios.

Providers of voice services, including local exchange carriers, interexchange carriers, and interconnected Voice over Internet Protocol (VoIP) service providers, are telephone corporations subject to the Commission’s jurisdiction.<sup>6</sup> Providers of local exchange, interexchange, and fixed interconnected VoIP services must obtain a CPCN or 1013 registration license to operate in California. Providers of only nomadic interconnected VoIP are subject to the Commission’s jurisdiction for rules of general applicability and preempted from licensing requirements that act as barriers to market entry. These providers must obtain a nomadic registration to operate in California.<sup>7</sup>

Combined proposes to provide resold non-facilities-based interexchange service. Specifically, Combined proposes 1) installing phones in jails and correctional facilities throughout California so that incarcerated individuals can

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<sup>5</sup> Pub. Util. Code § 1001.

<sup>6</sup> Pub. Util. Code §§ 216, 233, 234; D.22-10-021 at 68; D.24-11-003 at 18-19.

<sup>7</sup> D.24-11-003 at 40-42.

place calls; and 2) providing voice service to these incarcerated individuals.<sup>8</sup>

Combined is a telephone corporation and a public utility subject to the Commission's jurisdiction.<sup>9</sup>

## **5. Proposed Construction and California Environmental Quality Act (CEQA) Compliance**

Combined proposes to provide resold non-facilities-based service.

Pursuant to CEQA and Rule 2.4 of the Commission's Rules of Practice and Procedure (Rules), the Commission is the lead agency to consider the environmental consequences of projects subject to the Commission's approval.<sup>10</sup>

As the lead agency, the Commission must identify any potential environmental impacts and reduce and avoid them to the extent feasible. Because Combined states that it does not intend to construct any facilities, it can be seen with certainty that there is no possibility that granting this application will have an adverse impact upon the environment.<sup>11</sup> Should Combined decide to construct facilities, Combined must file for additional authority and submit to any necessary CEQA review.

Granting this CPCN will benefit the public interest by expanding the availability of technologically advanced telecommunications services within the state.

## **6. Financial Qualifications**

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<sup>8</sup> Combined June 24, 2025 Response at no. 3. 3, p. 2

<sup>9</sup> Combined June 24, 2025 Response at no. 3. 3, p. 2

<sup>10</sup> Public Resources Code §§ 21000, *et seq.*

<sup>11</sup> D.24-11-003 at 56-58.

To receive a CPCN for authority to provide resold non-facilities-based services, a new applicant must demonstrate that it has a minimum of \$25,000 cash or cash equivalent, reasonably liquid and readily available to meet the firm's start-up expenses.<sup>12</sup>

In the application, Combined provided an unaudited Statement of Income, Balance Sheet, and Cash Flow Statement, as well as a checking account statement, demonstrating that it had at least \$25,000.<sup>13</sup> This documentation demonstrates that Combined has sufficient funds to meet its start-up expenses and, thereby, fulfills this requirement. The Commission will verify and review Combined's financial documentation for one year to ensure that such funds are available. Accordingly, Combined must demonstrate that it maintained at least \$25,000 that was reasonably liquid and available for its first year of operations. Combined shall provide the Commission's Communications Division with a confidential copy of its updated financial documentation at both six and 12 months from the issuance date of this decision by email to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov).

In addition to demonstrating financial fitness, Combined must also demonstrate that it has an additional \$25,000 available for deposits to interconnect with local exchange carriers. The unaudited Statement of Income, Balance Sheet, and Cash Flow Statement also demonstrate compliance with this

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<sup>12</sup> The financial requirement for CLECs, NDIECs, and fixed interconnected VoIP providers is contained in D.24-11-003 at Appendix F.

<sup>13</sup> In response to the ALJ June 19, 2025 Ruling, Combined indicates that the financial statements submitted are Combined's financial statements and not of its parent or affiliates (Combined June 24 Response at no 1, p. 1).

deposit requirement. Because Combined provided documentation of its ability to pay deposits, it has satisfied this financial requirement.

## **7. Technical Qualifications**

To receive a CPCN for authority to provide interexchange service, an applicant must make a reasonable showing of managerial and technical expertise in telecommunications or a related business.<sup>14</sup> Combined supplied biographical information on its management in Appendix G to its application that demonstrates it has sufficient expertise and training to operate as a telecommunications provider.

## **8. Certification Requirements**

Combined's application indicated that no one associated with or employed by Combined as an affiliate, officer, director, partner, or owner of more than 10 percent of Combined, or anyone acting in a management capacity for Combined

(a) held one of these positions with a company that filed for bankruptcy; (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (c) been convicted of a felony; (d) been (to his/her knowledge) the subject of a criminal referral by judge or public agency; (e) had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction; (f) personally entered into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations

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<sup>14</sup> D.95-12-056 at Appendix C, Rule 4.A, *as modified by* D.13-05-035 and D.24-11-003.

of [Sections] 17000 *et seq.*, [Sections] 17200 *et seq.*, or [Sections] 17500 *et seq.* of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; or (g) been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries; or (h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.<sup>15</sup>

In its application, Combined also attested that to the best of Combined's knowledge, neither Combined, nor any affiliate, officer, director, partner, nor owner of more than 10 percent of Combined, or any person acting in such capacity whether or not formally appointed, is being, or has been investigated by the FCC or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.<sup>16</sup>

However, in a previous application, A.19-11-024 at Exhibit H, Combined disclosed an exception regarding a Consent Decree it had entered into with the FCC. In its July 7, 2025 response to the ALJ ruling, Combined verified that the exceptions provided in A.19-11-024 still apply and declared such exceptions as part of this application. Combined's failure to disclose the exceptions in its original application for A.25-02-008 is a failure to comply with certification requirements Ordering Paragraph (OP) 14(h).

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<sup>15</sup> D.13-05-035 at Ordering Paragraph (OP) 14 (requiring certifications); D.24-11-003 at 46 (extending and updating existing processes).

<sup>16</sup> D.13-05-035 at OP 14.

On November 10, 2025, the ALJ held a Status Conference and provided options for Combined to resolve its failure to declare an exception to the certification requirements, pursuant to D.13-05-035, OP 14 and D.24-11-003, including an option for Combined to file a motion stipulating to its violation and proposing a penalty amount. On December 22, 2025, Combined filed a Motion to Stipulate. This issue is further discussed in Section 14 of this decision.

Despite its inability to meet the certification requirements, we find that Combined has demonstrated transparency in its July 7, 2025 response and Motion to Stipulate. For this reason, we find that although Combined cannot meet the certification requirements of D.13-05-035 and D.24-11-003, it is in the public interest to grant the requested interexchange service authority.

## **9. Tariffs**

CLECs, IECs, and fixed interconnected VoIP providers requesting detariffed status and may be exempt from the requirement to file tariffs, provided they do not provide basic service as defined by D.12-12-038 and comply with the consumer protection rules identified in D.98-08-031. Combined indicated it will not offer services that require a tariff or schedule. Therefore, detariffed status is granted.

In the future, if Combined decides to offer services that require a tariff or schedule, such as basic service, Combined must submit proposed tariffs and/or user guides to the Commission's Communications Division by Tier 2 Advice Letter using the General Order (GO) 96-B advice letter process at least 30 days before initiation of service.

## **10. Request for Treatment as a Non-dominant Interexchange Carrier**

Based on Combined's June 24, 2025 response to the ALJ Ruling,<sup>17</sup> Combined requests treatment as a non-dominant interexchange carrier (NDIEC).<sup>18</sup> The Commission streamlined and updated the requirements for CLECs and NDIECs, and established a regulatory framework for VoIP providers in D.24-11-003.<sup>19</sup> Therefore, Combined is accorded all exemptions traditionally granted to NDIECs without the need for an individual grant for such treatment in this decision. Accordingly, Combined's request for NDIEC treatment is moot. Combined must follow the requirements as summarized and provided for by D.24-11-003, and as indicated in Appendices B through D.<sup>20</sup>

## **11. Safety Considerations**

With the adoption of the *Safety Policy Statement of the California Pub. Util. Commission* on July 10, 2014, the Commission has, among other things, heightened its focus on the potential safety implications of every proceeding. The Commission considered the potential safety implications here and is satisfied that Combined will meet the Commission's minimum safety goals and expectations of interexchange carriers because: (1) Combined has taken steps to meet the financial requirements as set forth in this decision for a non-facilities-based interexchange carriers, and (2) Combined is a public utility that is required pursuant to Pub. Util. Code Section 451 to "... furnish and maintain such adequate, efficient, just and reasonable service, instrumentalities, equipment, and

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<sup>17</sup> Combined June 24, 2025 Response at 2.

<sup>18</sup> D.85-07-08, 18 Cal. P.U.C.2d 381, 1985 Cal PUC LEXIS 595 \*6, as modified by D.85-11-044.

<sup>19</sup> See D.24-11-003 at Findings of Fact 7 and 38, Conclusions of Law 27 and 28.

<sup>20</sup> See D.24-11-003 at Appendices B-D.

facilities, including telephone facilities ... as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public.”

## **12. Conclusion**

Combined’s application conforms with the Commission’s rules for certification as a non-facilities-based interexchange reseller carrier. Accordingly, the Commission grants Combined a CPCN to provide resold non-facilities-based interexchange services; specifically installation of phones in jails and correctional facilities throughout California and provision of voice service to these incarcerated individuals, subject to compliance with the terms and conditions set forth in the OPs.

The CPCN granted by this decision provides benefits to Combined and corresponding obligations. Combined receives authority to operate in the prescribed service territory, and this authority enables Combined, pursuant to Section 251 of the 1934 Communications Act, as amended by the 1996 Telecommunications Act (47 U.S.C. Section 251), to interconnect with telecommunications carriers.<sup>21</sup>

In return, Combined is obligated to comply with all Pub. Util. Code provisions, Commission rules, GOs, and decisions applicable to telephone corporations providing approved services. The applicable statutes, rules, GOs, and decisions include, but are not limited to consumer protection rules, tariffing, and reporting requirements. Moreover, Combined is obligated to pay all Commission-prescribed user fees and public purpose program surcharges as set

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<sup>21</sup> The Pub. Util. Code uses the term “telephone corporation.” Its counterpart in federal law is a “telecommunications carrier.”

forth in Appendix B of this decision, to comply with CEQA, and to adhere to Pub. Util. Code Section 451 which states that every public utility "...shall furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, including telephone facilities, as defined in Section 54.1 of the Civil Code, as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public." Granting this application will benefit the public interest by expanding the availability of technologically advanced telecommunications services within the state.

**13. Additional Requirements for Applicants Following Commission's Grant of CPCN**

The CPCN granted in this decision is contingent upon Combined's compliance with several requirements: (1) rendering service to customers within 12 months from the effective date of this decision; (2) using its assigned corporate identification number in the caption of all original filings with the Commission; (3) filing in this docket a written acceptance of the certificate granted in this proceeding within 30 days of the effective date of this decision; (4) providing the name, address, e-mail address, and telephone number of its designated primary regulatory/official contact person to the Commission's Communications Division within five days of written acceptance of its certificate; (5) providing the name, address, e-mail address, and telephone number of its designated contact person for purposes of resolving consumer complaints to the Commission's Consumer

Affairs Branch within five days of written acceptance of its certificate; (6) submitting a Tier 1 Advice Letter containing a copy of the license holder's executed performance bond within 30 days of the effective date of this decision; (7) submitting its compliance with Pub. Util. Code Section 708, Employee Identification Cards, to the Commission's Director of the Communications Division, in writing, by email to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov), within 60 days of the effective date of this decision; (8) providing the date that competitive local exchange service is first rendered to the public to the Commission's Director of the Communications Division by email to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov), no later than five days after service first begins. These requirements are in addition to Combined's ongoing obligation to be subject to all the current requirements applicable to competitive local exchange carriers, interexchange carriers, and VoIP providers included in Attachments B, C, and D to this decision (including annual affiliate transaction reports, ongoing performance bond requirements, and payment of surcharges and user fees); all Consumer Protection Rules contained in GO 168; and all applicable Commission rules, decisions, GO, and statutes that pertain to California public utilities on an ongoing basis.

#### **14. Confidential Treatment of Documents and Rule 1.1 Violation**

##### **14.1 Confidentiality**

In Appendix I to A.25-02-008, Combined provided financial documents as listed in D.24-11-003 Appendix F. These documents are granted confidential treatment for a period of three years without the need to file a motion for

confidential treatment of the aforementioned documents.<sup>22</sup> During these three years, this information shall not be publicly disclosed except upon further Commission order or ALJ ruling. If Combined believes that it is necessary for this information to remain under seal for longer than three years, Combined may file a motion showing good cause for extending this order by no later than 30 days before the expiration of the grant of confidentiality.

#### **14.2 Rule 1.1 Violation**

Rule 1.1 of the Commission's Rules requires those doing business with the Commission to, in part, comply with California law and not make false statements.<sup>23</sup>

As discussed in Section 8 above, Combined failed to declare an exception (a Consent Decree it entered into with the FCC) in A.25-02-008 that had previously been declared in A.19-11-024. Combined subsequently declared this exception in its July 7, 2025 response to a June 27, 2025 assigned ALJ ruling.

Combined's failure to declare this exception in its application filed on February 24, 2025, is a violation of Rule 1.1, because in Section 7 of A.25-02-008, it stated that it had complied with the Certification Requirements pursuant to D.95-12-056 at Appendix C, Rule 4.A as modified by D.13-05-035 and D.24-11-003.

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<sup>22</sup> D.24-11-003 at 48-54; GO 66-D.

<sup>23</sup> Any person who signs a pleading or brief, enters an appearance, offers testimony at a hearing, or transacts business with the Commission, but such act represents that he or she is authorized to do so and agrees to comply with the laws of this State; to maintain the respect due to the Commission, members of the Commission and its Administrative Law Judges; and never to mislead the Commission or its staff by an artifice or false statement of fact or law.

At a Status Conference held on November 10, 2025, the assigned ALJ provided two alternatives for Combined to resolve its violation of Rule 1.1: 1) Combined would file and serve a motion stipulating to its violation of Rule 1.1 and proposing a fine/penalty; or 2) the Commission may open an Order to Show cause to investigate this Rule 1.1 violation.

On December 22, 2025, Combined filed its Motion to Stipulate. In its Motion to Stipulate, Combined stipulates to: (1) its violation of Rule 1.1 regarding its failure to disclose a Consent Decree it had previously entered into with the FCC on October 7, 2019; and (2) proposed a penalty amount of \$5,000.

Combined's stipulation regarding its violations of Rule 1.1 and the disclosure requirements referenced above is accepted by the Commission. We remind Combined that it must comply with all Commission requirements in any future acquisitions of entities regulated by this Commission.

In support of its proposed penalty, Combined states that: 1) the FCC Consent Decree was fully disclosed in Combined's prior application (A.19-11-024) and reviewed by the Commission; 2) its failure to disclose this exception in the current application had no impact on customers' service quality and rates, and did not affect Combined's operational fitness or compliance obligations; 3) once the lack of disclosure was identified, Combined immediately acknowledged the oversight, supplied all supporting documentation, and cooperated fully with the Commission; and 4) Combined has strengthened its internal compliance review procedures in order to avoid omissions such as the one at issue herein.

Pub. Util. Code Section 2107 provides that "any public utility that violates or fails to comply with any ... rule, direction, demand, or requirement of the

commission, in a case in which a penalty has not otherwise been provided, is subject to a penalty of not less than five hundred dollars (\$500), nor more than fifty thousand dollars (\$50,000) for each offense.” Accordingly, the penalty for Combined’s one office could range from \$1,000 to \$50,000.

In assessing the reasonableness of the penalty range, we apply to the criteria set forth in D.98-12-075 for guidance, and evaluate: (1) the severity of the economic or physical harm resulting from the violation; (2) the utility’s conduct to prevent, detect, disclose, and rectify the violation; (3) the utility’s financial resources; (4) the public interest involved; (5) the totality of the circumstances; and (6) Commission precedents.

Based on the above criteria, the Commission evaluates the penalty amount based on the criteria identified in D.98-12-075. Specifically: 1) the exception was disclosed and reviewed in a prior application; 2) lack of disclosure did not adversely affect customer service; 3) Combined complied with the disclosure requirement promptly once informed of it by the Commission; and 4) Combined has strengthened its internal controls in order to avoid similar failures to comply with Commission requirements

In consideration of Combined’s the public interest involved, Combined’s disclosure of the exception regarding the FCC Consent Decree, and the record of this proceeding, the Commission grants Combined’s Motion and Stipulation, and assesses a penalty amount of \$5,000. This penalty serves as an effective deterrent without affecting Combined’s ability to provide safe and reliable service to its customers. Payment shall be made by check or money order payable to the California Public Utilities Commission and mailed or delivered to the

Commission's Fiscal Office at 505 Van Ness Avenue, Room 3000, San Francisco, CA 94102. Combined must include a written identification stating the decision number and the application number, such as the following: "Per Decision [enter decision number here] of A.25-02-008."

#### **15. Summary of Public Comments**

Rule 1.18 allows any member of the public to submit written comments in any Commission proceeding using the "Public Comment" tab of the online Docket Card for that proceeding on the Commission's website. Rule 1.18(b) requires that relevant written comments submitted in a proceeding be summarized in the final decision issued in that proceeding.

There are no public comments submitted on the Docket Card.

#### **16. Comments on Draft Decision**

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

#### **17. Assignment of Proceeding**

Darcie L. Houck is the assigned Commissioner and Seaneen McCarthy Wilson is the assigned ALJ in this proceeding.

#### **Findings of Fact**

1. Combined is a Delaware limited liability company authorized to do business in California.

2. Combined's principal place of business is 100 Aqua Drive, Cold Spring, KY 41076.

3. Combined proposes to provide resold non-facilities-based interexchange services.

4. Combined will not construct any facilities.

5. Combined is a telephone corporation and a public utility as defined in Pub. Util. Code Sections 234(a) and 216(a).

6. Granting this CPCN is in the public interest because it will expand the availability of technologically advanced telecommunications services within the state.

7. Combined has a minimum of \$25,000 of cash or cash equivalent that is reasonably liquid and readily available to meet its start-up expenses.

8. Combined has an additional \$25,000 to cover deposits that may be required by other telephone corporations in order to provide the proposed service.

9. Combined's management possesses sufficient experience, knowledge, and technical expertise to provide *interexchange* services to the public.

10. Combined stated in its application that no one associated with or employed by Combined as an affiliate, officer, director, partner, agent, or owner (directly or indirectly) of more than 10 percent of Combined, or anyone acting in a management capacity for Combined: (a) held one of these positions with a company that filed for bankruptcy; (b) been personally found liable, or held one of these positions with a company that has been found liable, for fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (c) been convicted of a felony; (d) been the subject of a criminal referral by judge or public agency; (e) had a telecommunications license or operating authority denied, suspended, revoked, or limited in any jurisdiction; (f) personally entered

into a settlement, or held one of these positions with a company that has entered into settlement of criminal or civil claims involving violations of Section 17000 *et seq.*, Section 17200 *et seq.*, or Section 17500 *et seq.* of the California Business & Professions Code, or of any other statute, regulation, or decisional law relating to fraud, dishonesty, failure to disclose, or misrepresentations to consumers or others; (g) been found to have violated any statute, law, or rule pertaining to public utilities or other regulated industries; or (h) entered into any settlement agreements or made any voluntary payments or agreed to any other type of monetary forfeitures in resolution of any action by any regulatory body, agency, or attorney general.

11. Combined stated in its application that neither Combined, or any affiliate, officer, director, partner, nor owner of more than 10 percent of Combined, or any person acting in such capacity whether or not formally appointed, is being, or has been investigated by the FCC or any law enforcement or regulatory agency for failure to comply with any law, rule or order.

12. On December 22, 2025, Combined stipulated that it violated Rule 1.1 by failing to declare an exception to the certification requirements.

13. Combined did not meet the certification requirements in its application for a CPCN pursuant to D.13-05-013 and D.24-11-003.

14. Combined demonstrated transparency in its July 7, 2025 response and Motion to Stipulate.

15. Combined requested and is eligible for exemption from tariffing requirements and must observe the consumer protection rules adopted in D.98-08-031 and D.24-11-003.

16. Combined is eligible for all exemptions traditionally accorded NDIECs through D.24-11-003, without need for an individual grant of such treatment in this decision.

17. Combined will meet the Commission's minimum safety goals.

18. Combined filed documents which have a presumption of confidentiality pursuant to D.24-11-003 and GO 66-D in Appendix I to A.25-02-008.

### **Conclusions of Law**

1. Combined should be granted a CPCN to provide resold non-facilities-based interexchange services throughout California, subject to the terms and conditions set forth in this decision.

2. Combined should be granted resold interexchange authority and may not construct any facilities, including equipment in existing buildings or structures.

3. The Commission should grant Combined's Motion to Stipulate and assess a penalty amount of \$5,000 for Combined's violation of Rule 1.1.

4. Combined should demonstrate that it maintained at least \$25,000 that was reasonably liquid and available for its first year of operations by providing the California Public Utilities Commission's Communications Division with a confidential copy of its updated financial documentation at both six and 12 months from the issuance date of this decision by providing updated bank statements within eight and 14 months, respectively, as an information-only submittal by email to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov).

5. Combined should be exempt from tariffing. In the future, if Combined decides to offer services that require a tariff or schedule, such as basic service, Combined should submit proposed tariffs and/or user guides to the

Commission's Communications Division via Tier 2 Advice Letters using the General Order 96-B advice letter process at least 30 days before initiation of service.

6. Combined's request for NDIEC treatment should be denied as moot.

7. The authority for Combined to render service to customers under the rates, charges, and rules authorized, should expire if not exercised, by offering or actively providing service on a wholesale and/or resale basis, after 12 months from the effective date of this decision. Combined should be responsible for seeking approval for an extension of time to comply with this decision pursuant to Rule 16.6.

8. Combined should be assigned utility identification number U7532C and should be responsible for using this as its corporate identification number in the caption of all original filings with this Commission, in the titles of other pleadings filed in existing cases, and informal submissions to the Commission.

9. Combined should file in this docket a written acceptance of the certificate granted in this proceeding within 30 days of the effective date of this decision. The written acceptance filed in this docket should not reopen the proceeding.

10. Combined should provide the name, address, email address, and telephone number of its designated primary regulatory/official contact person to the Commission's Communications Division within five days of written acceptance of its certificate.

11. Combined should provide the name, address, email address, and telephone number of its designated contact person for purposes of resolving

consumer complaints to the Commission's Consumer Affairs Branch within five days of written acceptance of its certificate.

12. Combined should submit a Tier 1 Advice Letter containing a copy of the license holder's executed performance bond in accordance with the process established in D.10-09-017/D.11-09-026 and modified by D.13-05-035 and D.24-11-003 to the Commission's Communications Division within 30 days of the effective date of this decision.

13. Combined should submit its compliance with Pub. Util. Code Section 708, Employee Identification Cards, to the Commission's Director of the Communications Division, in writing, by email to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov), within 60 days of the effective date of this decision.

14. Combined should be subject to all the current requirements applicable to competitive local exchange carriers, interexchange carriers, and fixed interconnected VoIP included in Attachments B, C, and D to this decision (including annual affiliate transaction reports, ongoing performance bond requirements, and payment of surcharges and user fees); all Consumer Protection Rules contained in GO 168; and all applicable Commission rules, decisions, GO, and statutes that pertain to California public utilities on an ongoing basis.

15. Combined's financial documents should be kept under seal for a period of three years from the issuance date of this decision pursuant to D.24-11-003.

16. All rulings by the assigned Commissioner and the assigned ALJ should be affirmed.

17. All pending motions should be deemed denied.

18. This proceeding should be closed.

**O R D E R**

**IT IS ORDERED** that:

1. A Certificate of Public Convenience and Necessity is granted to Combined Public Communications, LLC to provide in the territories of resold non-facilities interexchange services throughout California, subject to the terms and conditions set forth in this decision.

2. Combined Public Communications, LLC may not construct any facilities, including equipment in existing buildings or structures.

3. Combined Public Communications, LLC must demonstrate that it maintained at least \$25,000 that was reasonably liquid and available for its first year of operations by providing the California Public Utilities Commission's Communications Division with a confidential copy of its updated financial documentation at both six and 12 months from the issuance date of this decision by providing updated bank statements within eight and 14 months, respectively, as an information-only submittal by email to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov).

4. Combined Public Communications, LLC (Combined) may operate on a detariffed basis. In the future, if Combined decides to offer services that require a tariff or schedule, such as basic service, Combined must submit proposed tariffs and/or user guides to the California Public Utilities Commission's Communications Division via a Tier 2 Advice Letter using the General Order 96-B process at least 30 days before initiation of service.

5. The certificate granted, and the authority for Combined Public Communications, LLC (Combined) to render service to customers under the

rates, charges, and rules authorized, will expire if not exercised, by offering or actively providing service on a wholesale and/or resale basis, after 12 months from the effective date of this decision. Combined is responsible for seeking approval for an extension of time to comply with this decision pursuant to the Rules of Practice and Procedure, Rule 16.6.

6. Combined Public Communications, LLC is assigned utility identification number U7532C and is responsible for using this as its corporate identification number in the caption of all original filings with the California Public Utilities Commission (Commission), in the titles of other pleadings filed in existing cases, and informal submissions to the Commission.

7. Combined Public Communications, LLC's (Combined) shall be assessed a penalty of \$5,000 for Combined's failure to disclose an exception to certification requirements in its application. Payment shall be made by check or money order payable to the California Public Utilities Commission and mailed or delivered to the Commission's Fiscal Office at 505 Van Ness Avenue, Room 3000, San Francisco, CA 94102. Combined must include a written identification stating the decision number and the application number, such as the following: "Per Decision [enter decision number here] of A.25-02-008."

8. Combined Public Communications, LLC must file in this docket a written acceptance of the certificate granted in this proceeding within 30 days of the effective date of this decision. The written acceptance filed in this docket does not reopen the proceeding.

9. Combined Public Communications, LLC must provide the name, address, email address, and telephone number of its designated primary

regulatory/official contact person to the California Public Utilities Commission's Communications Division within five days of written acceptance of its certificate. Refer to Attachment B for additional information related to updating contact information.

10. Combined Public Communications, LLC must provide the name, address, email 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 days of written acceptance of its certificate. Refer to Attachment B for additional information related to updating contact information.

11. Combined Public Communications, LLC must submit a Tier 1 Advice Letter containing a copy of the license holder's executed performance bond in accordance with the process established in Decision (D.) 10-09-017/D.11-09-026 and modified by D.13-05-035 and D.24-11-003 to the California Public Utilities Commission's Communications Division within 30 days of the effective date of this decision. Refer to Attachment B for additional information on annual performance bond requirements.

12. Combined Public Communications, LLC must submit its compliance with Public Utilities Code Section 708, Employee Identification Cards, to the California Public Utilities Commission's Director of the Communications Division, in writing, by email to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov), within 60 days of the effective date of this decision.

13. Combined Public Communications, LLC is subject to all the current requirements applicable to competitive local exchange carriers, interexchange

carriers, and fixed interconnected Voice over Internet Providers included in Attachments B, C, and D to this decision (including annual affiliate transaction reports, ongoing performance bond requirements, and payment of surcharges and user fees); 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. Confidential Treatment of Combined Public Communications, LLC's (Combined) Appendix I is granted for a period of three years after the date of this decision pursuant to Decision 24-11-003. During this three-year period, this information shall not be publicly disclosed except upon further Commission order or Administrative Law Judge ruling. If Combined believes that it is necessary for this information to remain under seal for longer than three years, Combined may file a motion showing good cause for extending this order by no later than 30 days before the expiration of this order.

15. All rulings by the assigned Commissioner and the assigned Administrative Law Judge are affirmed.

16. All pending motions are deemed denied.

17. Application 25-02-008 is closed.

This decision is effective today.

Dated March 19, 2026, at Sacramento, California.

JOHN REYNOLDS  
President  
DARCIE L. HOUCK

KAREN DOUGLAS  
MATTHEW BAKER  
CHRISTINE HARADA  
Commissioners

# **ATTACHMENT A**

**ATTACHMENT A**  
**TARIFF DEFICIENCIES**

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**(END OF ATTACHMENT A)**

## **ATTACHMENT B**

**ATTACHMENT B**  
**REQUIREMENTS APPLICABLE TO COMPETITIVE LOCAL EXCHANGE  
CARRIERS, INTEREXCHANGE CARRIERS AND FIXED  
INTERCONNECTED VOIP CARRIERS (Carrier)**

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 decision. 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 provided electronically, using the “Contact Information Request Update” form at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone> under Service Provider Requirements and Programs. Carrier is responsible for updating this information within 30 days of the change, or at least annually by June 1 of each calendar year.
4. Carrier is subject to California public purpose program surcharges and user fees. Pursuant to Decision (D.) 22-10-021, 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 and collected 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).

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 C 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 access lines to report and zero resulting surcharges to remit. Carriers that report and/or remit surcharge funds after the due date will be charged a penalty equal to an annual rate of 10 percent. Send an email to [Telcosurcharge@cpuc.ca.gov](mailto:Telcosurcharge@cpuc.ca.gov) for questions related to surcharges and access to TUFFS. Current and historical surcharge rates can be found at <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 through TUFFS within 15 days after the end of each calendar quarter (March 31, June 30, and September 30, and December 31) or 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 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. Send an email to [userfees@cpuc.ca.gov](mailto:userfees@cpuc.ca.gov) for questions related to user fees. Current and historical user fee rates can be found at <https://www.cpuc.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 for public purpose program surcharges and user fees filed by Pacific Bell Telephone Company dba AT&T California and applying 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 competitive local exchange carrier, the effectiveness of its future competitive local exchange carrier tariffs is subject to the requirements of General Order 96-B and the Telecommunications Industry Rules (D.07-09-019).

11. If Carrier is a non-dominant interexchange carrier, the effectiveness of its future non-dominant interexchange carrier tariffs is subject to the requirement of General Order 96-B and the Telecommunications Industry Rules (D.07-09-019).

12. Carrier providing competitive local exchange service is responsible for submitting a service area map as part of its initial tariff filed via Advice Letter to the Communications Division.

13. 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](mailto:cdcompliance@cpuc.ca.gov), in compliance with Public Utilities Codes Section 489(a), no later than February 15 of each year. If Carrier is

de-tariffed, it is responsible for providing an annual certification that it is granted exemption from tariff filing or is a de-tariffed carrier and identify the authorization granting such status.

14. Carrier is responsible for obtaining a performance bond of at least \$25,000 in accordance with Decision .13-05-035 and D.24-11-003. Within 30 calendar days after the effective date of CPCN authority, carrier is required to submit a Tier-1 advice letter to the Director of the Communications Division with a copy of the license holder's executed bond. 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. Pursuant to Decision .13-05-035, the Commission must revoke a certificate of public convenience and necessity if a carrier is more than 120 days late in providing the Communications Division a copy of its executed performance bond and the carrier has not been granted an extension of time by the Communications Division.

15. Carrier is required to submit a Tier 1 Advice Letter on an annual basis, no later than March 31 of each year, with a copy of the executed performance bond. Carrier is responsible for ensuring that its performance bond does not lapse during any period of its operation. Additional information regarding performance bond requirement is available at <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/carrier-reporting-requirements/performance-bond-requirements>.

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

17. 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 Bonds, 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 may 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 company's operating authority and/or a referral to the Commission's Consumer Protection and Enforcement Division for enforcement action, which could result in additional fines, penalties, or other sanctions.

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

19. Carrier is exempt from Pub. Util. Code Sections 816-830.

20. If Carrier decides to discontinue service or file for bankruptcy, it must immediately notify the California Public Utilities Commission's Director of the Communications Division by email to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov).

**(END OF ATTACHMENT B)**

## **ATTACHMENT C**

**ATTACHMENT C**  
**ANNUAL REPORT**

In addition to the annual reports requirement pursuant to General Order 104-A, submit the following information electronically via email to [cdcompliance@cpuc.ca.gov](mailto:cdcompliance@cpuc.ca.gov) no later than March 31 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 Sections 2107 and 2108.

Required information:

1. Exact legal name and Utility ID number of the reporting utility.
2. Address of the reporting utility.
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 begun.
  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.
12. Cash Flow statement as of December 31 of the calendar year for which information is submitted, for California operations only.

Additional information about the reporting requirements is available at <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@cpuca.ca.gov](mailto:cdcompliance@cpuca.ca.gov) with a subject line that includes: "CD Annual Reports."

**(END OF ATTACHMENT C)**

## **ATTACHMENT D**

## ATTACHMENT D

### CALENDAR YEAR AFFILIATE TRANSACTION REPORT

Submit the following information electronically using the Annual Affiliate Transaction Report Form<sup>24</sup> via e-mail to [cdcompliance@cpuc.ca.gov](mailto: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.

1. Each utility must 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;
  - Relationship to the utility (*e.g.*, controlling corporation, subsidiary, regulated subsidiary, affiliate);
  - Ownership of the utility (including type and percent ownership)
  - Voting rights held by the utility and percent; and
  - Corporate officers.
2. The utility must prepare and submit a corporate organization chart showing any and all corporate relationships between the utility and its affiliated entities and regulated subsidiaries in item 1 above. The chart must 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 subsidiary that in turn is owned by another subsidiary and/or affiliate) in the lower levels. Any regulated subsidiary must be clearly noted.
3. For a utility that has individuals who are classified as “controlling corporations” of the competitive utility, the utility must only report under the

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<sup>24</sup> An Annual Affiliate Report form (in PDF format) has been developed to help facilitate the submission of this reporting obligation and it is available at: [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/licensing-compliance/annual-reporting-requirements/annual-affiliate-transaction-report-form\\_.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/licensing-compliance/annual-reporting-requirements/annual-affiliate-transaction-report-form_.pdf).

requirements of item 1 and item 2 above 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 tariff 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 material 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 I-F of Decision 93-02-019.
6. Utilities that do not have affiliated entities must submit, in lieu of the annual transaction report, an annual statement to the Commission stating that 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 at <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@cpuca.ca.gov](mailto:cdcompliance@cpuca.ca.gov) with a subject line that includes: "CD Annual Reports."

**(END OF ATTACHMENT D)**