ALJ/SL5/smt **Date of Issuance 8/14/2026**

Decision 26-08-020 August 13, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of the Joint Application of TracFone Wireless, Inc. (U4321C), América Móvil, S.A.B. de C.V. and Verizon Communications, Inc. for Approval of Transfer of Control over Tracfone Wireless, Inc.	Application 20-11-001 (Filed November 5, 2020)

DECISION GRANTING COMPENSATION TO CENTER FOR ACCESSIBLE TECHNOLOGY FOR CONTRIBUTIONS TO RESOLUTION T-17849 AND DECISION 25-07-015

Intervenor: Center For Accessible Technology	**For contribution to** Decision (D.) 23-09-016, Resolution T-17849, D.25-07-015
Claimed: $45,844.00	**Awarded:** $36,433.00
Assigned Commissioner: John Reynolds[1]	**Assigned ALJ:** Sasha Goldberg

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	Decision (D.) 23-09-016 granted intervenor compensation to CforAT for substantial contributions to this proceeding. Resolution T-17849 waived the penalties associated with Ordering Paragraph 8 in D.21-11-030 requiring Verizon Communications Inc. to migrate all TracFone Wireless, Inc. (U4231C) California customers to the Verizon network within two years as a condition of approving the merger D.25-07-015 granted the June 14, 2024 Joint Motion of Center for Accessible Technology and Verizon Communications Inc. for Adoption of Settlement Agreement. The Settlement Agreement, signed by Center for Accessible Technology, Verizon Wireless Communications, and The Utility Reform Network, is uncontested. The Commission closed the proceeding.

[1] This proceeding was reassigned to Commissioner John Reynolds on April 28, 2026.

B. Intervenor must satisfy intervenor compensation requirements set forth in Public Utilities (Pub. Util.) Code §§ 1801-1812[2]:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of prehearing conference:	January 26, 2021	Verified
2. Other specified date for NOI:	N/A	
3. Date NOI filed:	February 25, 2021	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b)) or eligible local government entity status (§§ 1802(d), 1802.4):		
5. Based on Administrative Law Judge (ALJ) ruling issued in proceeding number:	Rulemaking (R.) 20-01-007 (Gas Planning)	Verified
6. Date of ALJ ruling:	May 29, 2020	Verified
7. Based on another CPUC determination (specify):	Rule 17.2 of the Commission's Rules of Practice and Procedure states that "[a] party found eligible for an award of compensation in one phase of a proceeding remains eligible in later phases, including any rehearing, in the same proceeding." The Commission found CforAT eligible customer for compensation and awarded compensation in this proceeding in D.23-09-016.	Verified
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of "significant financial hardship" (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	R.20-01-007 (Gas Planning)	Verified

[2] All statutory references are to California Public Utilities Code unless indicated otherwise.

	Intervenor	CPUC Verification
10. Date of ALJ ruling:	May 29, 2020	Verified
11. Based on another CPUC determination (specify):	The Commission previously found CforAT to be eligible for compensation and awarded compensation in this proceeding in D.23-09-016.	Verified
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.25-07-015	Verified
14. Date of issuance of Final Order or Decision:	July 29, 2025	Verified
15. File date of compensation request:	September 23, 2025	Verified
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I:

#	Intervenor's Comment(s)	CPUC Discussion
1	In this proceeding, the Commission previously awarded intervenor compensation to CforAT for substantial contribution to D.21-11-030, approving the Verizon-TracFone merger subject to conditions. D.23-09-016, issued September 28, 2023. Commission Rules of Practice and Procedure, Rule 17.2.	Noted

PART II: SUBSTANTIAL CONTRIBUTION

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. Overview: In D.21-11-030, the Commission approved Verizon's acquisition of TracFone subject to a number of mitigation measures. One of those mitigation measures is		Noted

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Ordering Paragraph 8 (OP 8), which requires that Verizon migrate all TracFone customers to the Verizon network within two years of the merger's close. In these comments, CforAT refers to this group of customers as "pre-acquisition TracFone customers." In approximately August of 2023, CforAT discovered that TracFone was continuing to provide handsets that were incompatible with the Verizon network to some new customers. In these comments, CforAT refers to those customers as "post-acquisition TracFone customers."		
This request seeks compensation for work related to: • Monitoring Verizon's compliance with OP 8 and responding to multiple Verizon requests to be relieved of its obligations under OP 8; and • Addressing post-acquisition TracFone customers who purchased service after the merger closed and received handsets that are not compatible with the Verizon network.		Noted
CforAT is also requesting compensation for a small amount of time spent replying to Verizon's objections to CforAT's previous compensation claim, which were rejected by the Commission.		CforAT was already compensated for their work in D.23-09-016[3]. *See* Part III.D CPUC Comments, Disallowances, and Adjustments.
Following the issuance of D.21-11-030 approving Verizon's		Noted

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
acquisition of TracFone subject to conditions, CforAT has continued to work within this proceeding to ensure that TracFone customers on non-Verizon networks do not lose service. This participation has included the following filings: • TURN and CforAT Joint Response to Verizon and TracFone Motion to Stay OP 8 of D.21-11-030, filed August 28, 2023 • CforAT Petition for Modification of D.21-11-030, filed October 6, 2023 • CforAT and TURN Comments on Proposed Resolution T-17849, filed October 23, 2024. • CforAT Motion to Withdraw Petition for Modification of D.21-11-030, filed February 22, 2024 • Joint Motion of CforAT and Verizon for Adoption of Settlement Agreement, filed June 14, 2024 • CforAT Response to Verizon and TracFone Motion to Withdraw Petition for Modification, filed July 16, 2025		
Additionally, CforAT has submitted the following response to Verizon Advice Letters: • June 9, 2023 letter to Rachel Peterson, Executive Director, re: Verizon Request for Extension of Time, Ordering Paragraph 8 (Migration Deadline), D.21-11-030 (Application 20-11-001, Verizon/TracFone Merger).		Noted

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
2. Pre-Acquisition TracFone Customers: As noted above, Verizon was required by OP 8 in the decision authorizing its acquisition of TracFone to migrate customers to its network at no cost to the customer. Beginning in 2023, Verizon began seeking relief from the migration requirements in OP 8. Verizon used several parallel strategies to accomplish this goal: • Verizon requested that the Executive Director grant an extension of time to comply with OP 8; • Verizon sought a stay of OP 8; and • Verizon filed a Petition to Modify D.21-11-030 requesting that the Commission eliminate OP 8. CforAT acted in response to each of these efforts opposing Verizon's efforts to avoid compliance with OP 8. The Commission ultimately addressed the issue of Verizon's obligations to the pre-acquisition TracFone customers in Resolution T-17849.		CforAT does not provide any citations of their claimed contribution that it "acted in response to each of these efforts opposing Verizon's efforts to avoid compliance with OP 8." *See* Part III.D CPUC Comments, Disallowances, and Adjustments.
CforAT repeatedly argued that the Commission should not grant Verizon's request to be relieved from its obligations under OP 8. CforAT June 9, 2023 letter to ED Rachel Peterson; Motion to Stay Ordering Paragraph 8 of D.21-11-030 at pp. 4-5 (Response to MTS); Response to the Petition of Verizon Communications, Inc.	Resolution T-17849 waives the penalties associated with OP 8, but does not eliminate D.21-11-030's requirement that Verizon migrate all TracFone customers to Verizon's network. *See* Resolution T-17849 at p. 6 ("This Resolution waives the penalty in D.21-11-030 associated with OP 8 customer migration based on staff recommendation and pursuant to D.21-11-030 Appendix A, Section 1.3	We verify that CforAT argued against "Verizon's request to be relieved from its obligations under [Ordering Paragraph] OP 8." We also note that CforAT held the same position as TURN by filing joint

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
and Tracfone Wireless, Inc. for Modification of D.21-11-030 at p.	Modification of Scheduled Fines by Resolution. Considering Verizon and Tracfone's efforts to implement the intent of the Decision, including the migration of more than 80 percent of the total affected customers, CD staff finds it reasonable to waive the fines from D.21-11-030, which would amount to $60,000 per day.")	comments together. Despite CforAT's arguments, Resolution T-17849 waived the penalties in OP 8.
CforAT argued that Verizon failed to engage in sufficient customer outreach, and that Verizon's outreach was simply repetition of efforts which had not been successful (e.g., repeated texts, emails, or physical mail). CforAT June 9, 2023 letter to ED Rachel Peterson at pp. 3-4; Response to MTS at pp. 3-4, 6-7; Response to Petition for Modification at pp. 14-15.	Resolution T-17849 notes that the Commission initially denied Verizon's request for an extension, and that the Commission "also recommended that strategies for a successful customer migration should be included in any future request submitted by Verizon." Resolution T-17849 at p. 4. The Commission issued Resolution T-17849 only after Verizon implemented a number of additional outreach efforts. *See* Resolution T-17849 at pp. 4-5.	We verify that CforAT argued that Verizon and TracFone's outreach efforts were repetitive and lackluster.
CforAT argued that Verizon was required to provide replacement handsets or SIM cards to pre-acquisision TracFone customers, and that those handsets or SIM cards could not be characterized as a "customer incentive."	"[S]taff acknowledges the characterization of a free SIM card or handset as a 'customer incentive' and replaces the word 'incentives' with 'offerings.'" Resolution T-17849 at p. 9.	We cannot verify CforAT's claimed contribution because there is not "a citation to the specific portions of documents filed in the proceeding or reporter's transcript reflecting the intervenor's testimony/arguments" as required by the Intervenor Compensation Program Guide (IComp Guide) at 20. *See* Part III.D CPUC Comments, Disallowances, and Adjustments.
CforAT argued that the Commission's waiver of the migration requirements would allow Verizon to terminate service to non-migrated customers when wholesale agreements with other providers expire.	The Commission disagreed with CforAT, stating that "Staff disagrees with CforAT and TURN that by modifying the schedule of fines; the Draft Resolution would also authorize Verizon to terminate TracFone customers' service when Verizon's wholesale contracts with AT&T and T-	CforAT did not provide "a citation to the specific portions of documents filed in the proceeding or reporter's transcript reflecting the

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
	Mobile expire. OP 8(d) states that wholesale contracts have expiration dates and contemplates the ending of service with 60 days, 30 days, and 7 days' notice." Resolution T-17849 at p. 9. While the Commission disagreed with CforAT, the above language in Resolution T-17849 indicates that the Commission did consider CforAT's arguments and the importance of ensuring that Verizon would not unreasonably terminate service to non-migrated customers. Accordingly, it is fair to conclude that CforAT's arguments assisted the Commission in making an order or decision. *See* D.25-07-031 at p. 29; D.05-04-049 at p. 7 ("[e]ven where the Commission does not adopt any of the customer's recommendations, compensation may be awarded if, in the judgment of the Commission, the customer's participation substantially contributed to the decision or order.")	intervenor's testimony/arguments" as required by the IComp Guide. However, CforAT does provide a citation stating that the Commission did review CforAT's shared position with TURN, but ultimately disagreed.
3. Post-Acquisition TracFone Customers: On October 6, 2023, CforAT filed a Petition for Modification (PFM) of D.21-11-030 addressing concerns about post-acquisition TracFone customers. Between October 2023 and February 2024, CforAT and Verizon engaged in settlement negotiations regarding those customers to ensure that they would retain service despite initially receiving handsets that were not compatible with Verizon's network. On February 22, 2024, CforAT filed a motion to withdraw its PFM, which included a Settlement Agreement between CforAT, TURN, and Verizon as Attachment A. The Commission directed CforAT to refile Attachment A as a	The Commission approved the Settlement Agreement without modification in D.25-07-015.	Verified

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
Motion for Settlement under Rule 12 of the Commission's Rules of Practice and Procedure. On June 14, 2024, CforAT and Verizon filed a Joint Motion for Adoption of Settlement Agreement.		
CforAT argued that the settlement agreement protected the public interest because it provided consumer protections that would not otherwise be available to post-acquisition TracFone customers. Motion to Withdraw Settlement at p. 2; Motion for Approval of Settlement at pp. 4-5.	"The Settlement Agreement protects the public interest, because it provides for customer protections that would not otherwise be available to post-acquisition customers." D.25-07-015 at p. 7 "[T]the Settlement Agreement is reasonable in light of the whole record because TURN, CforAT, Verizon, have agreed to extend protections adopted in OP 8 of D.21-11-030 to post-acquisition customers. D.25-07-015 at p. 8.	Verified, however CforAT's first citation to D.25-07-015 is in the decision, but on page six, not seven, and its second citation to the decision is on page seven, not eight.
CforAT argued that the Commission should adopt the settlement agreement because CforAT has a long history of representing customers and their interests.	"Moreover, TURN and CforAT have a long history of representing the interests of utility customers before the Commission and have carefully reviewed the Settlement Agreement and how it will affect post-acquisition customers." D.25-07-015 at p. 6	CforAT did not provide "a citation to the specific portions of documents filed in the proceeding or reporter's transcript reflecting the intervenor's testimony/arguments" as required by the IComp Guide. However, CforAT does provide a citation stating that the Commission did consider its argument.
5. Intervenor Compensation: CforAT appropriately sought compensation for its work in this proceeding contributing to the decision authorizing the merger with mitigating conditions. Verizon filed comments on the initial compensation request objecting to CforAT's requested	The Commission rejected Verizon's opposition to CforAT's requested rates. "The rates awarded take into consideration practical and relevant experience and we note that the added granularity of the Market Rate Study, including an additional level of experience and specificity to categories and roles, aid in our determination of rates." D.23-09-016 at p.20.	CforAT was already compensated for their work in D.23-09-016. Intervenors also cannot receive Intervenor Compensation Claim Preparation hours for time spent on comments on Intervenor

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
compensation rates. CforAT responded to the comments and argued that its requested rates were based on the framework and methodology established in ALJ-393. CforAT Reply Comments to the February 14, 2022 Response of Verizon Communications Inc. and TracFone Wireless, Inc. (U4321C) to Center for Accessible Technology's Claim for Intervenor Compensation at pp. 1-2. It is not common for parties to comment on intervenor compensation requests, and CforAT did not previously seek compensation for the time spent responding to these comments. However, compensation for work on intervenor compensation requests is appropriate (sought at ½ standard rates).	"We find CforAT's request for Intervenor Compensation to be consistent with the practice established in Resolution ALJ-393 and we remind all parties, as found in the Resolution at p. 4, 'new 2021 rates are unrelated to 2020 and prior Commission approved rates…[ensuring] fair application of the implemented Market Rate Study…starting with IComp work completed in 2021.'" D.23-09-016 at p. 20.	Compensation proposed decisions.[4] *See* Part III.D CPUC Comments, Disallowances, and Adjustments.

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor's Assertion	CPUC Discussion
a. Was the Public Advocate's Office of the Public Utilities Commission (Cal Advocates) a party to the proceeding?	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: TURN. CforAT and TURN worked closely together on issues addressed in this compensation request, consistent with our close coordination in the initial stages of this proceeding. As noted in CforAT's previous request for intervenor compensation, CforAT at times shared positions with other active parties, including The Greenlining Institute, Public Knowledge, The California Center for Rural Policy, Access Humboldt, Next Century Cities, The Benton Institute for Broadband and Society,		Noted

[4] *See* D.24-12-067 at 12 and D.15-09-021 at 5-7.

	Intervenor's Assertion	CPUC Discussion
Communication Workers of America, Tribal Digital Networks, The Open Technology Institute. These parties were generally not active following the authorization of the merger with conditions.		
d. Intervenor's claim of non-duplication: CforAT represents the interests of telecommunications customers with disabilities, who are dependent on reliable and affordable access to telecommunications to support their ability to live independently and to participate in activities of daily living. Because of the unique interests of this customer group, it is important for their perspective to be directly represented. To the extent that CforAT took similar positions to other parties on issues, this reflects the substantial shared concerns of impacted stakeholders. In these areas of shared concern, CforAT worked to represent the perspective of our constituency of persons with disabilities. In order to effectively address these important issues on behalf of our constituency and California consumers more generally, CforAT worked diligently to act effectively to prepare material that often required intensive and expedited effort. This was facilitated by the coordination among the consumer advocates. To the extent that there was any modest duplication of effort in the various filings that took place during a notably short proceeding schedule, it does not reach the level where CforAT's compensation should be reduced.		Noted

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

	CPUC Discussion
a. Intervenor's claim of cost reasonableness: CforAT's post-merger advocacy in this proceeding continued our efforts to protect impacted customers, including both those who previously were served by TracFone and those who purchased service after the merger. These customers were supposed to be protected by the conditions imposed by the Commission meant to counter competitive harms and protect low-income consumers and LifeLine subscribers and MVNOs and CforAT worked to ensure that those protections were implemented. It may be difficult to quantify exactly what financial benefits consumers might receive from the Commission's determination of this matter. However, it is safe to assume that the "savings" experienced by customers who were successfully migrated to Verizon's network (rather than losing service) as a result of this proceeding will greatly exceed CforAT's claim. As such, CforAT submits that its overall costs are reasonable.	Noted
b. Reasonableness of hours claimed:	After the adjustments

	CPUC Discussion
CforAT's hours were reasonable given the highly technical and legally complex issues being considered in this proceeding, including the need to migrate both pre-transaction and post-transaction TracFone customers to Verizon's network. Additionally, CforAT coordinated closely with TURN, throughout this proceeding. It should be noted that Rachel Sweetnam, CforAT's Staff Attorney, took the lead on drafting CforAT's Petition for Modification, under the supervision of senior attorney Paul Goodman. As a junior attorney, Ms. Sweetnam took longer to draft the PFM than a more senior at CforAT might have taken. However, Ms. Sweetnam's lower hourly rate more than compensates for any extra drafting time, even with the additional time spent by Mr. Goodman in reviewing and editing her work.	made to this claim, the remainder of the claimed hours are reasonable. *See* Part III.D CPUC Comments, Disallowances, and Adjustments.
c. Allocation of hours by issue: **Hours of Paul Goodman, Legal Counsel, 2022:** **OP 8 (0.9 hours, 100%)** The Category "OP 8" includes time spent on monitoring Verizon's compliance with Ordering Paragraph 8 of D.21-11-030 prior to Verizon's filing of its Petition for Modification, including reviewing Verizon's compliance reports and responding to Verizon's requests to the ED. **Hours of Paul Goodman, Legal Counsel, 2023:** **OP 8 (5.8 hours, 12.9%)** The Category "OP 8" includes time spent on monitoring Verizon's compliance with Ordering Paragraph 8 of D.21-11-030 prior to Verizon's filing of its Petition for Modification, including reviewing Verizon's compliance reports and responding to Verizon's requests to the ED. **PFM (25.9 hours, 57.7%)** The category "PFM" includes time spent on Verizon's July 27, 2023 Petition for Modification and August 11, 2023 Motion to Stay. CforAT notes that on August 28, 2023, we filed a Response to Verizon's PFM and served it on the proceeding's service list, but that Response is not currently included on the docket for this proceeding. CforAT is reaching out to the docket office to correct this oversight. **PFM-2 (9.1 hours, 20.3%)** The category "PFM-2" includes time spent on CforAT's October 6, 2023 Petition for Modification. **Settlement (4.2 hours, 9.3%)**	Noted

	CPUC Discussion
The category "Settlement" includes time spent on settlement negotiations and the drafting of the Motion to Withdraw and Motion for Adoption of Settlement Agreement. **Hours of Paul Goodman, Legal Counsel, 2024:** **Settlement (10.6 hours, 100%)** **Hours of Melissa Kasnitz, Legal Director, 2022:** **OP 8 (0.4 hours, 100%)** **Hours of Melissa Kasnitz, Legal Director, 2023:** **OP 8 (0.4 hours, 7.6%)** **PFM (3.7 hours, 69.9%)** **PFM-2 (1.2 hours, 22.64%)** **Settlement (4.2 hours, 9.3%)** **Hours of Melissa Kasnitz, Legal Director, 2024:** **Settlement (0.8 hours, 100%)** **Hours of Rachel Sweetnam, Staff Attorney, 2023:** **PFM-2 (17.8 hours, 100%)** **Hours of Rachel Sweetnam, Staff Attorney, 2023:** **Settlement (3 hours, 100%)**	

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Paul Goodman	2022	0.9	$ 550	D.23-03-030	$ 495	0.90	$550.00	$495.00
Paul Goodman	2023	44.92	$ 575	D.24-03-025	$ 25,829	38.72 [2, 3]	$575.00	$22,264.00
Paul Goodman	2024	10.6	$ 625	D.25-04-018	$ 6,625	10.00 [2]	$625.00	$6,250.00

CLAIMED						CPUC AWARD		
Rachel Sweetnam	2023	17.8	$ 220	D.24-06-022	$ 3,916	17.80	$220.00	$3,916.00
Rachel Sweetnam	2024	3	$ 240	D.25-04-041	$ 720	3.00	$240.00	$720.00
Melissa W. Kasnitz	2022	0.8[5]	$ 690	D.23-03-030	$276	0.00 [4]	N/A [5]	$0.00
Melissa W. Kasnitz	2023	5.3	$ 715	D.24-06-018	$ 3,789.50	0.00 [3, 4]	N/A [5]	$0.00
Melissa W. Kasnitz	2024	0.8	$ 735	D.24-10-028	$ 588	0.00 [4]	N/A [5]	$0.00
					Subtotal: $42,238.50			***Subtotal: $33,645.00***
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	**Year**	**Hours**	**Rate $**	**Basis for Rate***	**Total $**	**Hours**	**Rate $**	**Total $**
Paul Goodman	2022	0.5	$275	D.23-03-030	$137.50	0.00 [6]	N/A [5]	$0.00
Paul Goodman	2023[6]	10.2	$340	Comment 1	$2,468.00[7]	8.20 [6]	$340.00 [1]	$2,788.00
					Subtotal: $3,605.50			***Subtotal: $2,788.00***
					TOTAL REQUEST: $45,844.00			***TOTAL AWARD: $36,433.00***

*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

**Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer's normal hourly rate

ATTORNEY INFORMATION			
Attorney	**Date Admitted to CA BAR[8]**	**Member Number**	**Actions Affecting Eligibility (Yes/No?) If "Yes", attach explanation**
Paul Goodman	2002	219086	No

[5] CforAT's submitted timesheets show Kasnitz only worked 0.40 hours in 2022. This is reflected in the total requested for Kasnitz's 2022 work (0.40 x $690.00 = $276.00).

[6] CforAT's submitted timesheets and Comment 2 in Part III.C show that the correct year Goodman worked on this request for compensation was 2025.

[7] The correct total for Goodman's 2025 Intervenor Compensation Claim Preparation is $3,468.00.

[8] This information may be obtained through the State Bar of California's website at https://apps.calbar.ca.gov/attorney/LicenseeSearch/QuickSearch.

CLAIMED			CPUC AWARD
Melissa W. Kasnitz	1992	162679	No
Rachel Sweetnam	2023	350075	No

C. Attachments Documenting Specific Claim and Comments on Part III:[9]

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	The Commission has not yet established a 2025 rate for Mr. Goodman. Mr. Goodman's rate for 2024 (set in D.25-04-018) was $625. Applying the 2024 COLA increase of 3.46% to Mr. Goodman's 2023 rate results in a rate of $646.25. Additionally, per Resolution ALJ-393 at p. 5 (Dec. 22, 2020) CforAT requests a 5 percent step increase for Mr. Goodman. Mr. Goodman is currently in Tier V and has only received one step increase in that tier. Applying the step increase to the adjusted rate results in the requested rate of $678.96 per hour. Accordingly, a rate increase to $680.00 is appropriate.

D. CPUC Comments, Disallowances, and Adjustments

Item	Reason
[1] Goodman's 2025 Hourly Rate and Intervenor Compensation Claim Preparation Rate	CforAT requests a 2025 hourly rate of $680.00 for Goodman, which includes a second, and final, step increase for the Legal – Attorney – Level V classification. D.25-04-018 approved a 2024 hourly rate of $625.00 for Goodman. Per Resolution ALJ-393 we apply the 2025 escalation factor of 3.46% and the 5% step increase requested by CforAT to Goodman's 2024 hourly rate of $625.00 to adopt a 2025 hourly rate of $680.00 for Goodman after rounding to the nearest $5 increment. We apply one-half of Goodman's 2025 hourly rate of $680.00 for a 2025 Intervenor Compensation Claim Preparation rate of $340.00.
[2] Administrative and Clerical Tasks	The Commission does not compensate attorneys for time spent on clerical or administrative tasks, as such work is considered subsumed within professional fees. Administrative tasks typically include scheduling, communications with the Commission's Docket Office regarding filing procedures, overseeing administrative staff, photocopying, scanning, and other similar clerical activities.[10] In line with this policy, we reduce 1.50 hours for time associated with the following entries: *Goodman 2023 (0.90 hours reduced)* August 1, 2023: "Email exchange w/ TURN, Cal Advocates re: scheduling call" (0.20 hours)

[9] Attachments are not included with the final decision.

[10] *See* D.11-07-024 at 18.

Item	Reason
	August 10, 2023: "Email exchange w/A. Salas (TURN) re: possible call w/ VZW" (0.20 hours) September 12, 2023: "Email exchange with R. Sweetnam re: scheduling meeting re: PFM-2" (0.20 hours) October 30, 2023: "Email exchange with Verizon re: scheduling call." (0.20 hours) December 1, 2023: "Email exchange w/ G. Why re: schedule" (0.10 hours) *Goodman 2024 (0.60 hours reduced)* February 6, 2024: "Coordinating call w/TURN." (0.30 hours) June 5, 2024: "Draft email to parties noticing settlement conference" (0.30 hours)
[3] Excessiveness	Excessive is when the Commission determines that the time claimed is disproportionate to the reasonable amount of effort required for that contribution. Furthermore, the burden of proof is on the intervenor to show that each of the hours claimed was spent productively to make a substantial contribution to the decision. CforAT requested 28.10 hours for their work on PFM-2, which included internal communications, drafting the petition, reviewing filings from the proceeding, editing the petition, reviewing the petition, and time after the petition was filed regarding communications with other parties to the proceeding. We find that the 28.10 hours were excessive given the 11.25 pages of substantive work product produced. The length of a document does not always indicate its depth, substance, and impact. The reductions made here are not based on the length of the document, but due to inefficiencies and the excessive time spent producing it. In Part III.A.b, CforAT states that Sweetnam took the lead drafting PFM-2 and Goodman supervised Sweetnam's work by reviewing and editing the draft. We find the 17.80 hours CforAT claimed for Sweetnam's work as the lead author to be reasonable. However, we find the 9.10 hours Goodman worked on the document to be excessive as a supervisor. We also find all of Kasnitz's time working on the document excessive due to her role being duplicative of Goodman's. This results in the following reductions: 2023 Goodman: 5.30 hours reduced 2023 Kasnitz: 1.20 hours reduced
[4] Duplication	The Commission compensates intervenors for reasonable and efficient participation that contributes to the development of the record and aids in decision-making. However, we find that CforAT's claimed hours reflect a significant duplication of effort. Specifically, multiple representatives—whether attorneys or experts—worked on the same issues, attended the same meetings, hearings, or workshops, and participated in activities where only one representative would have been sufficient, given the relative simplicity or limited scope of the issues involved. CforAT claims hours for three attorneys in this proceeding. CforAT provides justification for Goodman's and Sweetnam's role in Part III.A: "Reasonableness of hours claimed" but does not for Kasnitz. CforAT classified Kasnitz as its Legal Director, which Resolution ALJ-393 defines someone who:

<table>
<tr><th>Item</th><th>Reason</th></tr>
<tr><td></td><td><blockquote>Oversees the legal work of the organization, including providing strategic direction. Alternate title may be General Counsel. Responsible for coordinating and supervising a legal team. Participates in the most complex legal actions. Oversees all legal operations including case assignment, hiring, supervision and professional development of the legal staff, as well as budgeting.</blockquote>
In Part III.A, CforAT stated that Goodman’s role in this proceeding was to supervise Sweetnam’s work. We find that this description for Goodman’s work overlaps with the work for Kasnitz’s classification as a Legal Director. Further, we find that Kasnitz’s participation in this proceeding was unnecessary as CforAT had two attorneys in Goodman and Sweetnam already working in this proceeding.

CforAT’s level of staffing resulted in unnecessary, redundant, and inefficient participation that did not provide added value to the proceeding. Accordingly, we find that the involvement of multiple representatives in these instances was not justified and resulted in excessive hours. As a result, we reduce Kasnitz’s remaining 4.50 hours to ensure that only reasonable and non-duplicative efforts are compensated.

2022 Kasnitz: 0.40 hours reduced
2023 Kasnitz: 4.10 hours reduced
2024 Kasnitz: 0.80 hours reduced</td></tr>
<tr><td>[5] Kasnitz’s Hourly Rates</td><td>Because we disallow all hours claimed for Kasnitz, we do not reach the issue of the reasonableness of the requested hourly rates.</td></tr>
<tr><td>[6] Intervenor Compensation Claim Preparation Disallowance</td><td>We reduce 2.50 hours from CforAT’s Intervenor Compensation Claim Preparation time as follows:

<u>Work on D.23-09-016 (0.50 hours reduced)</u>
CforAT requested 0.50 hours for their work commenting on the Proposed Decision that awarded it Intervenor Compensation, which ultimately became D.23-09-016. As we stated in Part II.A, CforAT is not eligible to receive compensation for this work. We therefore reduce Goodman’s 2023 Intervenor Compensation Claim Preparation time by 0.50 hours.

<u>Failure to Comply with Intervenor Compensation Program Guidelines (2.00 hours reduced)</u>
The Intervenor Compensation Program Guide requires intervenors to provide “a citation to the specific portions of documents filed in the proceeding or reporter’s transcript reflecting the intervenor’s testimony/arguments”. In Part II.A we found multiple instances where CforAT failed to meet this requirement. Given the experience of CforAT, and its representative Goodman, as intervenors, we find it reasonable to reduce Goodman’s 2025 Intervenor Compensation Claim Preparation time by 2.00 hours.</td></tr>
</table>

PART IV: OPPOSITIONS AND COMMENTS
Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c))

A. Opposition: Did any party oppose the Claim?	Yes

If so:

Party	Reason for Opposition	CPUC Discussion
Verizon/ Tracfone	Monitoring compliance with OP 8 is not reimbursable.	The Commission reduced time for activities that did not materially assist in resolving the proceeding or where compensation was not justified under the statute.
Verizon/ Tracfone	CforAT did not substantially contribute to any decision on Verizon's Petition for Modification or Resolution T-17849.	The Commission reduced time for activities that did not materially assist in resolving the proceeding or where compensation was not justified under the statute.
Verizon/ Tracfone	The Commission should disallow CforAT's excessive hours for administrative, clerical, and duplicative tasks.	The Commission reduced time for activities that did not materially assist in resolving the proceeding or where compensation was not justified under the statute.
Verizon/ Tracfone	The Commission should disallow CforAT's hours for preparation of its claim and its requested 2025 rate.	The Commission reduced time for activities that did not materially assist in resolving the proceeding or where compensation was not justified under the statute.

B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(c)(6))?	No

If not:

Party	Comment	CPUC Discussion
CforAT	The claim that the settlement somehow modified D.21-11-030's Ordering Paragraph 8 requirements regarding the migration of pre-merger customers is erroneous, and should not be the basis of any reductions in compensation.	The Commission reviewed CforAT's comments and removed language from Part II.A to reflect that the settlement agreement that was approved by D.25-07-015.
CforAT	The Proposed Decision's (PD) determination that comments on a proposed decision on an Intervenor Compensation claim cannot be compensated is without legal foundation and constitutes error.	As clarified above, we note that these hours were reduced because CforAT's work related to defending the amount of compensation proposed in an Intervenor Compensation claim is not related to any underlying issue of

		A.20-11-001. We also note that CforAT was already compensated for its work related to that Intervenor Compensation claim in D.23-09-016.
CforAT	The PD's disallowance of compensation for a minimal amount of time spent on strategic participation by CforAT leadership is error.	The Commission reviewed CforAT's comments and found that no changes to the PD are necessary.
CforAT	The PD's analysis of introductory language in the compensation claim constitutes error.	The Commission reviewed CforAT's comments and found that no changes to the PD are necessary.
CforAT	The Commission should consider CforAT's work on the petition for modification (PFM-2) in the proper context. First, Sweetnam joined CforAT in 2023, and did not previously work on the Verizon/TracFone proceeding which required that Goodman devote a larger than usual number of hours providing Sweetnam with the background of the proceeding and the arguments in PFM-2. Second, CforAT first became aware of the issues giving rise to its filing when reviewing TracFone's August 22, 2023 AL 101, almost two years after D.21-11-030 approved the transaction. Accordingly, it was necessary for Goodman to spend time refamiliarizing himself with the underlying proceeding in order to provide accurate information to Sweetnam and Kasnitz.	The Commission reviewed CforAT's comments and found that no changes to the PD are necessary. We are unconvinced that it is reasonable for an attorney with the experience of Goodman to need 9.1 hours, costing ratepayers over $5,000, to refamiliarize himself and another attorney with the background that led to D.21-11-030. The reductions in the PD to Goodman's and Kasnitz's claimed time better reflects a reasonable amount of time to produce PFM-2.
Verizon/ Tracfone	The Commission should affirm that time spent litigating the amount of an intervenor compensation award is not compensable.	The Commission reviewed the Verizon and Tracfone joint comments and made changes to the PD to include a reference to D.15-09-021 in Part II.A.
Verizon/ Tracfone	CforAT's remaining objections ask the Commission to reweigh reasonableness determinations that are adequately supported.	The Commission reviewed the Verizon and Tracfone joint comments and found that no changes to the PD are necessary.

FINDINGS OF FACT

1. Center for Accessible Technology has made a substantial contribution to Resolution T-17849 and D.25-07-015.

2. Center for Accessible Technology has not made a substantial contribution to D.23-09-016.

3. The requested hourly rates for Center for Accessible Technology's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.

4. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.

5. The total of reasonable compensation is $36,433.00.

CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Center for Accessible Technology is awarded $36,433.00.

2. Within 30 days of the effective date of this decision, Verizon Communications, Inc. shall pay Center for Accessible Technology the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning December 7, 2025, the 75th day after the filing of Center for Accessible Technology's request, and continuing until full payment is made.

3. The comment period for today's decision is not waived.

4. Application 20-11-001 is closed.

This decision is effective today.

Dated August 13, 2026, at San Francisco, California.

JOHN REYNOLDS
President
DARCIE L. HOUCK
KAREN DOUGLAS
CHRISTINE HARADA
Commissioners

Commissioner Matthew Baker recused himself from this agenda item and was not part of the quorum in its consideration.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:	D2608020	**Modifies Decision?**	No
Contribution Decision(s):	Resolution T-17849, D2507015		
Proceeding(s):	A2011001		
Author:	ALJ Sasha Goldberg		
Payer(s):	Verizon Communications, Inc.		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Center for Accessible Technology	September 23, 2025	$45,844.00	$36,433.00	N/A	*See* Part III.D CPUC Comments, Disallowances and Adjustments

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Paul	Goodman	Attorney	$ 550	2022	$550.00
Paul	Goodman	Attorney	$ 575	2023	$575.00
Paul	Goodman	Attorney	$ 625	2024	$625.00
Paul[11]	Goodman	Attorney	$ 680	2025	$680.00
Melissa	Kasnitz	Attorney	$ 220	2022	N/A
Melissa	Kasnitz	Attorney	$ 240	2023	N/A
Melissa	Kasnitz	Attorney	$ 690	2024	N/A
Rachel	Sweetnam	Attorney	$ 715	2023	$715.00
Rachel	Sweetnam	Attorney	$ 735	2024	$735.00

(END OF APPENDIX)

[11] The Commission added in this line for Goodman's hourly fee information in 2025.