

ATTACHMENT B: METHODOLOGICAL APPENDIX

A. PROCEDURAL HISTORY

121. On March 3, 2023, AT&T filed the Application to relinquish its ETC designation in all Wire Centers (“WCs”) within its California service territory. On April 6, 2023, Intervenors filed a protest to AT&T’s Application. In response, on April 17, 2023, AT&T filed a reply to Intervenors’ Protest. On May 15, 2023, Intervenors filed a motion to dismiss AT&T’s Application.¹⁴³ In response, on May 23, 2023, AT&T filed a response to Intervenors’ MTD, including materials on fire-threat zones, floodplains, and Disadvantaged Communities.

122. On July 21, 2023, the Administrative Law Judge (“ALJ”) assigned to this case issued a ruling directing AT&T to provide additional information related to its Application.¹⁴⁴ In response, on August 24, 2023, AT&T filed a response to the ALJ’s July Ruling. As required by the ALJ’s July Ruling, this response identified Advice Letters from ETCs that updated or modified some ETCs’ designations. In addition, AT&T’s August Filing relied on the updated coverage maps released by the CPUC since the filing of AT&T’s Application. Finally, AT&T excluded some of the ETCs that it had relied on in its original Application.¹⁴⁵

123. On September 20, 2023, the CPUC issued the Scoping Memo which outlined the issues to be resolved in this proceeding and also set the schedule for testimony from both AT&T and Intervenors. After the release of the Scoping Memo, Intervenors requested that AT&T identify which of the previously submitted materials should be designated its “opening

143. Motion to Dismiss of The Utility Reform Network and Center for Accessible Technology, May 15, 2023, Application 23-03-002 (“Intervenors’ MTD”).

144. The Administrative Law Judge’s Ruling Setting Status Conference and Requiring Additional Information, July 21, 2023 (“ALJ’s July Ruling”). In addition to the ALJ’s July Ruling, the ALJ provided further clarification to his requests to AT&T California during the August 2, 2023, Status Conference (“August Status Conference”).

145. AT&T excluded ETCs that obtained their ETC designation as a result of their successful participation in the Rural Digital Opportunity Fund (“RDOF”) auction. I understand that these ETCs have not yet started offering services in areas where they won the RDOF auction. In addition, AT&T excluded one of the mobile wireless ETCs, Blue Jay Wireless, because the CPUC had revoked its authority to operate in California subsequent to the filing of AT&T’s Application.

testimony.”¹⁴⁶ In response, AT&T designated¹⁴⁷ Attachments 1, 2, 3, 4, 5, and 6, and Sections I.A, I.B, and III of AT&T’s August Filing, and Attachments A and B to AT&T’s May Filing. Attachment A to the AT&T’s May Filing indicates the WC, exchange, Census-defined community, and county for each CB in AT&T’s service territory. Attachment B to the AT&T’s May Filing lists certain characteristics of each CB that do not relate to ETC coverage. Therefore, Attachments A and B to the AT&T’s May Filing, which were previously designated as a part of AT&T’s Opening Testimony, remain unchanged and have not been updated.

124. On November 30, 2023, Ms. Susan M. Baldwin submitted testimony on behalf of TURN. Ms. Baldwin was asked by TURN to “analyze [AT&T’s Application], as well as address the potential consumer impact of granting [AT&T’s Application].”¹⁴⁸ Ms. Baldwin opined that AT&T’s Application should be rejected because “AT&T has failed to demonstrate in its [Application] that AT&T’s customers are served by another ETC that is willing to provide service now or by the time the proposed relinquishment would go into effect.”¹⁴⁹ More specifically, Ms. Baldwin claimed that (i) services provided by mobile wireless ETCs are unreliable and nonexistent in some areas; (ii) wireline facilities-based ETCs do not cover the entirety of AT&T’s service territory; (iii) one ETC (ConnectTo Communications) may not be viable going forward; and (iv) approval of AT&T’s Application would harm AT&T’s customers by potentially jeopardizing their access to public safety.

146. Email from Ashley Salas to Judge Thomas Glegola, September 29, 2023, Application 23-03-002.

147. Email from Nelsonya Causby to Judge Thomas Glegola, October 26, 2023, Application 23-03-002.

148. Baldwin Testimony, p. 2.

149. Baldwin Testimony, p. 3.

125. On December 13, 2023, during a status conference, the ALJ assigned to this proceeding raised questions with respect to ConnectTo Communications.¹⁵⁰ AT&T responded to those questions raised by the ALJ on January 5, 2024.¹⁵¹

126. I and the staff at Compass Lexecon working under my direction have previously analyzed data maintained by AT&T, the CPUC, the FCC, Census, and other sources. The results of this analysis have been included as a part of the submissions made by AT&T to the CPUC in this proceeding.¹⁵²

- Attachment A to AT&T’s Application in this matter, filed on March 3, 2023.¹⁵³
- Attachments A and B to AT&T’s Reply,¹⁵⁴ filed on April 17, 2023, to the Protest from Intervenors Center for Accessible Technology (“CforAT”) and The Utility Reform Network (“TURN”) filed on April 6, 2023.¹⁵⁵
- Attachments A, B, C, and D to AT&T’s Response, filed May 23, 2023,¹⁵⁶ to the Motion to Dismiss filed by Intervenors CforAT and TURN on May 15, 2023.¹⁵⁷
- Attachments 1, 2, 3, 4, 5, and 6 to AT&T’s response, filed August 24, 2023,¹⁵⁸ to the Administrative Law Judge’s (“ALJ”) Ruling from July 21, 2023.¹⁵⁹

150. Status Conference, Application 23-03-002, December 13, 2023, pp. 57-68. Ms. Baldwin raised a different issue with ConnectTo. *See*, Baldwin Testimony, pp. 47-48.

151. Pacific Bell Telephone Company d/b/a AT&T California’s (U 1001 C) Response to Questions of the Administrative Law Judge, Application 23-03-002, filed January 5, 2024 (“AT&T’s January 5, 2024 Filing”).

152. I understand that my workpapers have been available to all parties upon request.

153. AT&T’s Application.

154. AT&T’s Reply.

155. Intervenors’ Protest.

156. AT&T’s May Filing.

157. Intervenors’ MTD.

158. AT&T’s August Filing.

159. ALJ’s July Ruling.

B. ETCs DESIGNATED IN CALIFORNIA

127. On its website, the CPUC lists 50 ETCs designated in California, including AT&T.¹⁶⁰ Counsel for AT&T reviewed the list and identified 25 non-ILEC ETCs for further review and analysis. The excluded providers are ILECs with non-overlapping service territories with AT&T, which is an ILEC itself. I further narrow the list of ETCs for the purposes of my analysis by removing certain ETCs which do not appear to be currently offering residential voice services in California. Finally, I exclude ETCs that obtained their ETC designation as a result of their successful participation in the Rural Digital Opportunity Fund (“RDOF”) auction. I understand that these ETCs have not yet started offering services in areas where they won the RDOF auction.

128. The ETCs which I include in my analysis may be classified into the following categories (Table 22 below shows the full list of currently included ETCs):

- Facilities-based wireline providers, including cable companies, a CLEC.
- Entities that were designated as ETCs as a result of their participation in the CAF II auction.
- Facilities-based mobile wireless providers.
- Mobile wireless resellers.
- AT&T wireline reseller.

160. <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/service-quality-and-etc/eligible-telecommunications-carrier>.

Table 22: Selected ETCs Designated in California

ETC Category	ETC Name
Cable compnay	Cox California Telecom, LLC dba Cox Communications and Cox Business Services
Cable compnay	Time Warner Cable Information Services dba Time Warner Cable
CAF II	Cal.net, Inc.
CAF II	California Internet, L.P. dba GeoLinks
CLEC	Consolidated Communications Enterprise Services, Inc. fka SureWest TeleVideo dba SureWest Broadband
Facilities-based wireless provider	Assurance Wireless USA, L.P. dba Assurance Wireless; fka Virgin Mobile USA, L.P.
Facilities-based wireless provider	TracFone Wireless, Inc. dba SafeLink; Total Wireless; Straight Talk Wireless; Net10 Wireless; Page Plus; Simple Mobile; Go Smart
Wireless reseller	Air Voice Wireless, LLC dba AirTalk Wireless
Wireless reseller	IM Telecom, LLC dba Infiniti Mobile
Wireless reseller	Telrite Corp. dba Life Wireless
Wireless reseller	American Broadband and Telecommunication Company LLC dba Your Call Wireless
Wireless reseller	AmeriMex Communications Corp dba SafetyNet Wireless
Wireless reseller	Boomerang Wireless, LLC dba EnTouch Wireless
Wireless reseller	Global Connection Inc. of America dba Stand Up Wireless
Wireless reseller	i-wireless, LLC dba Access Wireless
Wireless reseller	TAG Mobile, LLC
Wireless reseller	TruConnect Communications, Inc. dba Surelink Mobile; fka Telscape Communications, Inc.
AT&T California reseller	ConnectTo Communications, Inc.

Source: CPUC.

C. MAPPING DETAILS

129. To define AT&T's designated ETC area, I rely on the FCC Study Area Maps, which depict the service territories of all ILECs throughout the United States.¹⁶¹ As I describe above, AT&T is designated as an ETC in its entire ILEC service territory. I overlay AT&T's service territory, as defined by the GIS shapefiles, with the boundaries of the CBs from the 2020 Census. I then consider CBs with any overlap with the AT&T ILEC service territory map to be a part of its ETC designated area, even if less than the entire CB area is covered by the AT&T ILEC service territory.¹⁶² That is, if any portion of a CB is located within the FCC Study Area Maps for AT&T, I treat that entire CB as part of AT&T's ETC designated area.

161. Available at <https://www.fcc.gov/file/18873/download>.

162. More specifically, I calculate the percentage of the total area of each CB covered by AT&T's ILEC service territory. Because some of the shapes (polygons) are cut imprecisely in the underlying data, and, additionally, because calculations of the areas of complex shapes involve approximations, the resulting calculated percentage overlap

130. Below I describe the specific steps I take to identify the ETC designated areas of each ETC and to overlay them with AT&T's ETC designated area.

1. Facilities-based wireline providers

131. Cox California Telcom and TWC are two cable companies with ETC designations in California.¹⁶³ For both cable companies, the ETC designation applied to their entire footprints at the time of ETC designation and extended the ETC designation to any additional non-rural territories the cable company would expand to in the future.

132. For Cox's designated ETC area, I rely on the CPUC Fixed Broadband Map. As I describe above, the CPUC Fixed Broadband Map reports the fixed broadband providers and technologies deployed to each CB as of December 31, 2021.

133. Even though TWC is now a part of Charter (Spectrum), its ETC designation predates the merger. Therefore, I assume that the ETC designation only applies to the legacy footprint of TWC. However, because TWC is no longer tracked by the CPUC as a stand-alone entity, I rely on the latest available FCC Form 477 that reports Time Warner Cable's footprint separately from Charter (Spectrum)—the FCC Form 477 data as of June 2016. I overlay the underlying map, which is based on CB boundaries as of the 2010 Census, with the CB boundaries as of the 2020 Census. And I consider any 2020 CB to be a part of TWC's designated ETC area if at least 50 percent of that CB's area is covered by TWC's footprint.

134. Two carriers obtained their ETC designations as a result of their successful participation in the CAF II auction: Cal.net, Inc. and California Internet, L.P. dba GeoLinks.¹⁶⁴ CAF II winning entities and their corresponding areas are identified using public FCC CAF II

between AT&T's service territory and the CB boundaries sometimes includes a small amount of rounding error. To minimize the effect that the rounding error has on my analysis, I assume that any CB that does not have at least 0.1 percent of the area overlapping is not a part of AT&T's ILEC service territory. Imposing this condition excludes only 0.2 percent of the total number of CBs.

163. CPUC Decision 13-10-002, October 7, 2013, and CPUC Decision 14-03-038, April 3, 2014.

164. CPUC Resolution T-17640, February 5, 2019, and CPUC Resolution T-17646, February 22, 2019.

Map data. CAF II maps are based on CB boundaries as of the 2010 Census. For each ETC that obtained its ETC designation as a result of participation in the CAF II auction, I classify each CB as of the 2020 Census to be a part of the designated ETC area if at least 50 percent of that CB's area is covered by the carrier's footprint in the CAF II Map data. Neither of the two carriers that obtained its ETC designation as a result of its successful participation in the CAF II auction accounts for 50 percent or more of the population of any AT&T WCs. Therefore, these entities do not appear in the previously filed WC-level attachments.

135. For the ETC SureWest, which is a CLEC, I rely on the CPUC Fixed Broadband Map described above. More specifically, I use the fixed broadband footprint of "Consolidated Communications," which acquired SureWest in 2012.¹⁶⁵ The CPUC Fixed Broadband Map data contain information on broadband deployment at the CB level (based on CB boundaries as of the 2020 Census).

2. Facilities-based mobile wireless providers

136. Assurance Wireless is a subsidiary of T-Mobile USA. While its predecessor entity, Virgin Wireless, obtained its ETC designation in 2011,¹⁶⁶ its current ETC designation is governed by the CPUC's Decision related to the merger between Sprint and T-Mobile.¹⁶⁷ Its ETC designated area corresponds to the current T-Mobile mobile wireless footprint. I rely on the CPUC Mobile Broadband Map for the information on the current footprint of T-Mobile. I overlay the CPUC Mobile Broadband Map with CB boundaries (as of the 2020 Census) and classify Assurance Wireless as designated in each CB if at least 50 percent of that CB's area is covered by T-Mobile's mobile wireless footprint.

137. TracFone is a subsidiary of Verizon Wireless. While it originally obtained its ETC designation in 2015,¹⁶⁸ its current ETC designation is governed by the CPUC's Decision

165. <https://www.consolidated.com/about-us/news/article-detail/id/433/consolidated-communications-completes-purchase-of-surewest-communications>.

166. CPUC Resolution T-17284, May 5, 2011.

167. CPUC Decision 20-04-008, April 16, 2020.

168. CPUC Resolution T-17467, August 13, 2015.

related to the purchase of TracFone by Verizon.¹⁶⁹ Its ETC designated area corresponds to the current Verizon Wireless mobile wireless coverage footprint with the exception of Tribal Lands. I rely on the CPUC Mobile Broadband Map for the information on the current footprint of Verizon Wireless. I overlay the CPUC Mobile Broadband Map with CB boundaries (as of the 2020 Census) and classify TracFone as designated in each CB if at least 50 percent of that CB's area is covered by Verizon Wireless' footprint unless that CB is classified to be a part of Tribal Lands.

138. In order to identify Tribal Lands, I rely on Census TIGER Tribal Block Group national shapefiles.¹⁷⁰ I overlay Census Tribal Lands data with CB boundaries (as of the 2020 Census). I classify each CB as a part of Tribal Lands if at least 50 percent of the CB's area is covered by the Tribal Lands footprint.

3. Mobile wireless resellers

139. There are 10 mobile wireless resellers currently designated as ETCs in California. Table 23 below lists those ETCs along with the details of the CPUC Resolutions that granted their ETC status. The Resolutions granting the ETC designation identify the designated ETC area for each mobile wireless reseller listed in the table below. Among other things, the Resolutions indicate which facilities-based wireless providers are the underlying carriers and also specify any restrictions on the ETC-designated service area relative to the total wireless footprint of the underlying carriers. For instance, some of the mobile wireless ETCs did not seek ETC designation in Tribal Lands. The last column of Table 23 below lists this information.

169. CPUC 21-11-030, November 18, 2021.

170. www2.census.gov/geo/pdfs/maps-data/data/tiger/tgrshp2020/TGRSHP2020_TechDoc.pdf.

Table 23: Mobile Wireless Reseller ETCs

ETC Name	Resolution	Resolution Date	Underlying Carrier(s) Maps
Air Voice Wireless, LLC dba AirTalk Wireless	T-17481	July 23, 2015	AT&T and T-Mobile mobile wireless maps
IM Telecom, LLC dba Infiniti Mobile	T-17729	June 3, 2021	AT&T, T-Mobile, and Verizon mobile wireless maps, excluding Tribal Lands
Telrite Corp. dba Life Wireless	T-17462	November 20, 2014	AT&T wireless mobile map
American Broadband and Telecommunication Company LLC dba Your Call Wireless	T-17516	September 14, 2017	T-Mobile mobile wireless map, excluding Tribal Lands
AmeriMex Communications Corp dba SafetyNet Wireless	T-17543	December 1, 2016	T-Mobile and Verizon mobile wireless maps
Boomerang Wireless, LLC dba EnTouch Wireless	T-17436	May 15, 2014	T-Mobile, Verizon, and AT&T mobile wireless maps
Global Connection Inc. of America dba Stand Up Wireless	T-17466	December 14, 2014	T-Mobile wireless map
i-wireless, LLC dba Access Wireless	T-17449	September 11, 2014	T-Mobile wireless map
TAG Mobile, LLC	T-17437	May 15, 2014	T-Mobile and Verizon mobile wireless maps
TruConnect Communications, Inc. dba Surelink Mobile; fka Telscape Communications, Inc.	T-17587	March 1, 2018	T-Mobile wireless map, excluding Tribal Lands

Source: CPUC.

140. I rely on the CPUC Mobile Broadband Map for the information on the current footprints of the facilities-based wireless carriers. I overlay the CPUC Mobile Broadband Map with CB boundaries (as of the 2020 Census) and classify each of the underlying carriers (AT&T Mobility, Verizon Wireless, and T-Mobile) as offering service in each CB if at least 50 percent of that CB's area is covered by the footprint of the carrier. I then classify a mobile wireless reseller as designated as an ETC in a CB if that CB is served by at least one underlying carrier.

141. Similar to the procedure I use for TracFone, I set aside CBs within Tribal Lands for mobile wireless reseller ETCs that have this carve out. As described above, I rely on Census Tribal Lands Map data and classify a CB as being within Tribal Lands if at least 50 percent of the CB's area is covered by the Tribal Lands footprint.

4. AT&T Reseller

142. ConnectTo Communications is an AT&T (wireline) reseller. It holds an ETC designation throughout AT&T's service territory.¹⁷¹ Therefore, it has full overlap with AT&T's service territory.

143. As I explain above, it is economically appropriate to include ConnectTo, and I have applied the same methodology to ConnectTo as I have to other resellers. ConnectTo has an agreement that allows it to resell AT&T's service throughout AT&T's service territory. ConnectTo's tariff states that it provides service throughout AT&T's service territory.¹⁷² Its ETC designation specifies the entirety of AT&T's service footprint.¹⁷³ It also has limited facilities of its own,¹⁷⁴ which are tracked in the CPUC Broadband Map data.¹⁷⁵ The fact that ConnectTo does not have its own facilities throughout AT&T's service area does not mean that it is not obligated to serve customers in its designated ETC area or that it is not capable of doing so. Indeed, ConnectTo's website states simply that it "provides California Lifeline services for

171. CPUC Resolution T-17152, December 18, 2008.

172. Under the section "Service Area Maps," ConnectTo's Tariff notes that it "provides competitive local exchange service in California within the service territories of Pacific Bell Telephone Company, Verizon California, Inc., Roseville Telephone Company, and Citizens Telephone Company." ConnectTo Tariff, p.8. *See*, https://www.connectto.com/wp-content/uploads/2023/10/ConnectToCommunications_AdviceFiling23A_Tariff_06012023_CALPUC.pdf. The tariff also describe the Lifeline service provided by ConnectTo.

173. Resolution T-17152, CPUC, December 18, 2008, p. 5 ("We adopt CD's recommendation and grant ConnectTo's request to become designated as an ETC with the authority to only be eligible to receive federal Lifeline and Link-Up program subsidies serving the entire study areas of AT&T/Pacific Bell and Verizon California in California."). The designation also describes ConnectTo's service obligations.

174. <https://www.connectto.com/> ("ConnectTo is a facilities-based competitive local exchange carrier with copper and fiber infrastructure. We provide conventional and digital HD quality phone service for your home and business.").

175. The CPUC Broadband Map submission guidelines explicitly state that only facilities-based providers need to submit data. And partial resellers "should submit data on broadband they provide from facilities they own." *See*, <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/broadband-mapping-program/broadband-data-submission-guidelines-and-templates>.

customers in California” without drawing any geographic limitations. It further states that “[w]e will submit your request to receive Lifeline services and will help with the approval process. Contact us and we will set you up with our free and discounted Lifeline services.”¹⁷⁶

D. CHANGES RELATIVE TO AT&T’S AUGUST FILING

144. For ease of reference, in this subsection I highlight the differences of the analysis presented in this testimony relative to the analysis encompassed in AT&T’s August Filing.

145. Another previously identified ETC, Blue Casa LLC dba Blue Casa Telephone and Telscape Communications, which is a reseller of AT&T wireline service designated an ETC in entire AT&T service territory, appears to be going out of business.¹⁷⁷ Therefore, I exclude Blue Casa from my analysis. I also update my analysis based on the most recent AT&T POTS and Lifeline customer data as of December 2023.

176. <https://www.connectto.com/lifeline-service/>.

177. <http://www.bluecasa.com/>.