

Decision 09-04-030 April 16, 2009

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Into
Implementation of Federal Communications
Commission Report and Order 04-87, As It
Affects The Universal Lifeline Telephone
Service Program.

Rulemaking 04-12-001
(Filed December 6, 2004)

**DECISION GRANTING INTERVENOR COMPENSATION TO DISABILITY RIGHTS
ADVOCATES FOR ITS SUBSTANTIAL CONTRIBUTIONS TO DECISION
(D.) 07-05-030 AND D.08-08-029**

Claimant: Disability Rights Advocates	For contribution to D.07-05-030, D.08-08-029
Claimed (\$): \$63,538.81	Awarded (\$): \$55,575.56 (13% reduction)
Assigned Commissioner: Dian M. Grueneich	Assigned ALJ: Karen Jones

PART I: PROCEDURAL ISSUES

A. Brief Description of Decision: Decision Adopting Strategies to Improve the California LifeLine Certification and Verification Processes, and Reinstating Portions of General Order 153; and

Decision Adopting a Pre-Qualification Requirement for the California LifeLine Telephone Program and Resolving Remaining Phase 2 Issues.

B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:

	Claimant	CPUC Verified
Timely filing of notice of intent to claim compensation (§ 1804(a)):		
1. Date of Prehearing Conference:	No prehearing conference was held in this matter.	Yes
2. Other Specified Date for NOI:	February 14, 2005	Yes
3. Date NOI Filed:	February 14, 2005	Yes

4. Was the notice of intent timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b))		
5. Based on ALJ ruling issued in proceeding number:	R.04-12-001 et. al.	Yes
6. Date of ALJ ruling:	March 8, 2005	Yes
7. Based on another CPUC determination (specify):		
8. Has the claimant demonstrated customer or customer-related status?		Yes
Showing of “significant financial hardship” (§ 1802(g))		
9. Based on ALJ ruling issued in proceeding number:	R.04-12-001 et. al.	Yes
10. Date of ALJ ruling:	March 8, 2005	Yes
11. Based on another CPUC determination (specify):		
12. Has the claimant demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision	D.07-05-030: Adopting Strategies to Improve the California Lifeline Certification and Verification Process, and Reinstating Portions of General Order 153; and D.08-08-029: Adopting a Pre-Qualification Requirement for the California LifeLine Telephone Program and Resolving Remaining Phase 2 Issues	Yes
14. Date of Issuance of Final Decision:	May 7, 2007 and August 25, 2008	Yes
15. File date of compensation request:	October 24, 2008	Yes
16. Was the request for compensation timely?		Yes

C. Additional Comments on Part I (use line reference # as appropriate):

#	Claimant	CPUC	Comment
3	DisabRA		<p>DisabRA filed a timely Notice of Intent to Claim Compensation (NOI) in early 2005, and submitted a prior request for compensation based on this NOI on 1/30/06. Compensation was awarded to DisabRA for the initial work on this proceeding on 4/13/06. Neither the parties nor the Commission anticipated the subsequent phases of this proceeding, which developed based on difficulties in making the changes to the LifeLine program ordered in the initial decision issued on 04/08/05.</p> <p>No subsequent NOI was filed, however, the time spent by DisabRA on the subsequent phases of this proceeding have been reasonable and should be compensated in full. Thus, DisabRA is now seeking compensation for its substantial contribution to Phase II and the two relevant decisions issued by the Commission (D.07-05-030 and D.08-08-029).</p>

PART II: SUBSTANTIAL CONTRIBUTION

A. In the fields below, describe in a concise manner Claimant's contribution to the final decision (*see* § 1802(i), § 1803(a) & D.98-04-059) (For each contribution, support with specific reference to final or record.)

Contribution	Citation to Decision or Record	Showing Accepted by CPUC
1. In conjunction with the other Joint Consumers, DisabRA made substantial contributions to D.07-05-030 regarding improvements to the LifeLine Certification and Verification processes, as detailed in subsequent fields. See also Part II.B, below, discussing how DisabRA worked efficiently with the other intervenors who collectively participated and filed documents as "Joint Consumers."		Yes
2. In D.07-05-03, as part of the short term strategies for addressing LifeLine problems, the Commission noted concerns about backbilling and the way in which these concerns are aggravated by long delays in eligibility determinations. In response to Joint	Final Decision at p. 12; <i>see also</i> Ordering Paragraph No. 13.	Yes

<p>Consumers' suggestion, the Commission agreed to address these concerns about backbilling in Phase II and resolved to gather data and to address expanded timeline issues to evaluate the extent of the issue.</p> <ul style="list-style-type: none"> • In conjunction with the decision to address backbilling generally in Phase II, the Commission specifically noted Joint Consumers' concern regarding large backbilled amounts and encouraged carriers to work with consumers on special payment arrangements. 	<ul style="list-style-type: none"> • Final Decision at 13. 	
<p>3. In D.07-05-03, Joint Consumers raised concerns regarding the use of the resolution process for making changes to GO 153, and noted that stakeholders would have an interest in commenting on any changes. The Commission expressly noted that it saw "value in providing the same timeline as for a proposed decision so stakeholders have an adequate opportunity to review the draft resolution," and also agreed to circulate any draft resolutions to the service list in this proceeding to address due process concerns.</p>	<p>Final Decision at 15-16, Ordering Paragraph No. 2.</p>	<p>Yes</p>
<p>4. A second short-term strategy for program improvements discussed in D.07-05-03, concerned Contract Amendment Initiatives. Joint Consumers addressed these issues in detail, including through comments and through the working groups. The Commission agreed to amend its contract with Solix to implement multiple procedural changes to improve communication with customers.</p> <ul style="list-style-type: none"> • Changes to be implemented include distinctive envelopes, phone reminders, revisions to 	<p>Final Decision at 18-20, Ordering Paragraphs No. 1, 3, 5-6.</p>	<p>Yes</p>

<p>certification forms, “soft” denials; an IVR system; creation of a “true up” for data reconciliation; and a switch from standard to first-class mail in order to speed up time-sensitive mailings.</p> <ul style="list-style-type: none"> • Joint Consumers’ strongly advocated the need to use first class mail and supported other improvements. 		
<p>5. The third short-term strategy adopted in D.07-05-03 addressed short-term outreach efforts, including educating consumers and CBOs, expanding carrier communications with customers, and improving LifeLine outreach material. Each of these strategies were informed by the work of the Marketing Working Group, including consumer groups, strategizing on more effective means to communicate with LifeLine customers regarding program changes.</p> <ul style="list-style-type: none"> • The Commission also recognized concerns with the application forms, as noted by the Marketing Working Group. While the Commission declined to make major changes to the form due to expense, it directed staff to make some modifications, and sought further changes in the next contract cycle. 	Final Decision at pp. 22-26.	Yes
<p>6. In addition to the short-term strategies enacted through D.07-05-03, the Commission also noted the need for various long-term strategies for improving the LifeLine Program. In order to advance these long-term goals, in conjunction with staff and the working groups, the Commission determined that it should keep this</p>	Final Decision at pp. 32-35, Ordering Paragraph No. 13.	Yes

<p>proceeding open and follow up on appropriate strategies, and officially commenced the second phase on this docket. The Commission also specifically directed ongoing meetings by the Working Groups to address issues relating to the certification and verification process, and explicitly noted that consumer groups should be represented on the working groups “so that staff has the benefit of their viewpoints and expertise.”</p> <ul style="list-style-type: none"> As part of the discussion of long term strategies, the Commission also expressly reiterated its support for development of a web-based system as a way to expedite the certification and verification process. 	<ul style="list-style-type: none"> Final Decision at 33-34, Ordering Paragraph No. 15. 	
<p>7. In conjunction with the other Joint Consumers, DisabRA made substantial contributions to D.08-08-029 regarding prequalification and other Phase 2 issues as detailed in subsequent fields. See Additional Comments on Part II for a discussion of ways in which a contribution can be substantial even if the Commission does not adopt the position advanced by a party.</p>		<p>Yes</p>
<p>8. In D.08-08-029, the Commission adopted a prequalification requirement for LifeLine over the opposition of Joint Consumers. While the Commission did not accept Joint Consumers argument against prequalification, it made substantial modifications to its prequalification plan based on the input of Joint Consumers:</p> <ul style="list-style-type: none"> In response to Joint Consumers’ questioning of the data put forth in the proposed decision on prequalification, the Commission sought 	<ul style="list-style-type: none"> See discussion on data; Final Decision at pp. 11-18; <i>id.</i> at p. 22 (noting that data is problematic). 	<p>Yes</p>

<p>additional information from the carriers and acknowledged that “the data provided to CD appears to be problematic.”</p> <ul style="list-style-type: none"> • The Final Decision requires “all carriers to inform LifeLine applicants of the payment plans available to them for non-recurring charges,” and rejects AT&T’s argument that this would constitute “rate regulation.” More definitively, the Final Decision “require[s] carriers to offer payment plans to LifeLine applicants. • In response to concerns from Joint Consumers, the Commission clarified language in the PD to definitively state that customers should be credited the difference between Lifeline rates and standard rates back to the date when the customer first requested to be added to LifeLine, not the date that the customer is deemed eligible. The Commission also clarified definitions of “application date” versus “certification date” for consumers to ensure these credits are calculated correctly. • While the Commission did not accept Joint Consumers’ position that customers should be issued a refund check as a default option, with the option to request a credit to their account, the Commission did require carriers to take more substantial steps to inform consumers of their right to a refund rather than a credit, at the consumer’s option. 	<ul style="list-style-type: none"> • Final Decision at p. 23; <i>id.</i> at 27-28. <i>See also id.</i> at 29 (requiring carriers to offer payment plans). • Final Decision at pp. 30-31; <i>See also id.</i> at 32-33 (reflecting relevant amendments to GO 153, including definitions of “application date” and certification date). • Final Decision at pp. 30-32. 	
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9. In D.08-08-029, the Commission incorporated Joint Consumers' concerns in developing a process for the implementation of prequalification. In agreement with virtually all parties, the Commission substantially expanded its initial timeline for implementation, and expressly set an objective of ensuring that consumers receive sufficient education about LifeLine and the new prequalification requirement.	<i>See</i> Discussion on outreach and education, including coordination with CBOs, using targeted media, and engaging in extensive training. Final Decision at 41-42.	Yes
10. D.08-08-029 affirms that the working groups have been of substantial value and that they will continue to be helpful in monitoring the implementation of prequalification and other issues; the Final Decision thus orders the working group meetings to continue.	Final Decision at 43.	Yes
11. As requested by Joint Consumers and DRA, the Commission will keep the proceeding open until prequalification is implemented in order to have a forum to address any issues that may arise.	Final Decision at p. 43.	Yes
12. The Final Decision notes with approval the early success of the interactive website, which was strongly supported by Joint Consumers.	Final Decision at 44 [find cites in the record re: joint consumer support]	Yes
13. The Final Decision cites with approval the information provided by Joint Consumers regarding the experiences of other states with coordinated websites for various low income programs. While the Commission indicates that it does not currently have the resources to commit to an extensive effort to redesign its website, it does make more extensive findings on ways to promote synergies between various programs, discussed in more detail below.	<i>See</i> Final Decision at pp. 44-46; discussion of synergies at pp. 53-56.	Yes

<p>14. As recommended by the Joint Consumers and other parties, the Commission retains income-based eligibility for LifeLine, noting Joint Consumers' citation to the universal service directive in Pub. Util. Code § 871.5(c), and holding that "there is no evidence that program-based eligibility alone could capture those 20% of applicants who apply through income-based processes." In this section, the Commission also relied on data provided by Joint Consumers regarding consumer eligibility for other qualifying programs, and noting that "until data from the CertA shows us that the number of customers applying based on income is <i>de minimus</i>, we are unwilling to eliminate income-based eligibility."</p>	<p>Final Decision at pp. 46-50.</p>	<p>Yes</p>
<p>15. In response to the recommendation of Joint Consumers, the Commission will have non-response data analyzed by language group to help determine whether there are differences in responses.</p>	<p>Final Decision at pp. 52-53; Finding of Fact No. 19.</p>	<p>Yes</p>
<p>16. The Final Decision takes multiple actions to enhance synergies between LifeLine and other low income programs.</p> <ul style="list-style-type: none"> • The Commission adopts Joint Consumers' suggestion to develop a brochure describing all relevant state low income programs (including LIHEAP) to be used as part of outreach materials by the Commission, utilities, and other agencies. • The Commission notes the utility of including similar information on its website, and 	<p><i>See generally</i> the discussion of synergies, Final Decision at 53-56.</p> <ul style="list-style-type: none"> • Final Decision at 55-56; Ordering Paragraph No. 11. • Final Decision at p. 56; Ordering Paragraph No. 11 	<p>Yes</p>

<p>asks the Commission's Executive Director to coordinate an effort to move forward on such changes.</p> <ul style="list-style-type: none"> • The Commission notes that it sees merit in using application forms to make customers aware of other low income programs. Because of the expense of making changes to application forms, it directs CD to work with CertA to include information about other programs on the forms at the next time there are revisions. • The Commission directs the Executive Director to develop a new proceeding specifically to coordinate subscribership in all of the Commission's low income programs. • The Commission indicates that it will be working with its new LifeLine marketing contractor to enhance participation by CBOs in the outreach effort. 	<ul style="list-style-type: none"> • Final Decision at p. 56. • Final Decision at p. 56; Ordering Paragraph No. 12. • Final Decision at p. 56; Conclusion of Law No. 14. 	
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B. Duplication of Effort (§§ 1801.3(f) & 1802.5):

	Claimant	CPUC Verified
a. Was DRA a party to the proceeding? (Y/N)	Y	Yes
b. Were there other parties to the proceeding? (Y/N)	Y	Yes
c. If so, provide name of other parties: Solix, Inc.; Fones4All; National Consumer Law Center; Talk America, Inc.; Citizens/Frontier Communications; Sage Telecom, Inc.; Verizon Services Organization, Inc.; Verizon California, Inc.; Time Warner Connect; MediaOne/AT&T Broadband; Telscape Communications, Inc.; Vycera Communications, Inc.; San Diego Gas & Electric Company, Inc.; Utility Consumers' Action Network; Semptra Utilities; Ducor Telephone Company; Kerman Telephone Company; The Ponderosa Telephone Co.; The Utility Reform Network; AT&T Communications of California; MCI Metro Access Transition Services; Cox Communications; Latino Issues Forum; Blue Casa Communications; the small LEC's and Surewest Telephone and Televideo; Adir International Export Ltd.; Comcast Cable Communications, Inc.; Apex Telecom, Inc.; the Greenlining Institute; Pac-West Telecomm, Inc.; Pinnacles Telephone Company; Foresthill Telephone Co., Inc.; Calaveras Telephone Co.; Cal-Ore		Yes

Telephone Co.; the Siskiyou Telephone Co.; Happy Valley/Hornitos/Winterhaven Telephone Co.	
<p>d. Describe how you coordinated with DRA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:</p> <p>Disability Rights Advocates (DisabRA) closely coordinated its efforts with the other consumers groups for all submissions in this phase of the proceeding, working in conjunction with TURN, the National Consumer Law Center and Latino Issues Forum collectively as “Joint Consumers.” In working together, the Joint Consumers sought to maximize effectiveness by ensuring that each organization took the lead in its unique area of expertise, while sharing responsibility for issues that jointly affected consumers. DisabRA, as the only party in this proceeding that represented the unique interests of persons with disabilities, took the lead in addressing the distinct difficulties and barriers experienced by this community in ULTS program participation. Similarly, LIF took the lead on issues affecting language minorities, and the other consumer groups took the lead on other issues.</p> <p>People with disabilities are also disproportionately low income and share overlapping concerns with other low income and/or underrepresented communities, making it appropriate and efficient for DisabRA to work with the other consumer groups on all issues affecting low income consumers. Thus DisabRA worked to maximize its efficiency, while seeking the greatest impact in its areas of expertise. In light of the foregoing, DRA’s compensation should not be reduced based on unnecessary duplication. See additional comments below.</p>	Yes

C. Additional Comments on Part II (use line reference # or letter as appropriate):

#	Claimant	CPUC	Comment
II.A.7	DisabRA		<p>In general, compensation for qualified intervenors is appropriate if the Commission adopts one or more of the factual or legal contentions, or specific policy or procedural recommendations put forward by the customer. California P.U. Code § 1802(i). This assessment requires the exercise of judgment. Even if none of a customer’s recommendations are adopted, compensation may still be awarded if, in the judgment of the Commission, the customer’s participation substantially contributed to the decision or order, for example by providing a unique perspective that enriched the Commission’s deliberations and the record. In this instance, the Commission rejected Joint Consumer’s specific proposal to reject a move to prequalification; however there can be no doubt that Joint Consumers’ participation on the question of prequalification enriched the record and the discussion. In addition, as noted elsewhere, the Commission did adopt other recommendations and mitigating measures supported by Joint Consumers.</p>

II.B.d	DisabRA		In D.07-10-002, the Commission awarded compensation to National Consumer Law Center for its substantial contribution to D.07-05-030, in which it participated as one of the Joint Consumers. In that decision, the Commission found that NCLC, acting as one of the Joint Consumers, made a substantial contribution and that it collaborated closely with other consumer groups to avoid duplication of effort, particularly by filing jointly.
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PART III: REASONABLENESS OF REQUESTED COMPENSATION

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

Concise explanation as to how the cost of claimant's participation bears a reasonable relationship with benefits realized through participation (include references to record, where appropriate)	CPUC Verified
<p>It is not possible to directly quantify the benefits to the significant number of low-income disabled persons who participate in (or are eligible for) the LifeLine program, but it is clear that the participation of DisabRA resulted in substantial benefits to low-income disabled consumers and to low-income consumers generally.</p> <p>The Commission specifically noted the value of the contribution of consumer groups in D.07-05-030 where it stated: "The synergies of having working groups comprised of staff, carriers, Solix and consumer groups were an invaluable tool in developing the creative proposals found in the Staff Report. Consumer groups should be represented...so that staff has the benefit of their view points and expertise." D.07-05-030 at 35.</p> <p>DisabRA's collaboration and efficient division of labor with other consumer groups resulted in the vigorous advocacy of the interests of low-income California consumers who would have been underrepresented if not for the availability of intervenor compensation. Thus, the benefits of DisabRA's participation outweighed the costs. See also D.07-10-002 awarding intervenor compensation to NCLC for work on D.07-05-030 at pp. 16-17 (finding NCLC to have been productive despite difficulty in quantifying social benefits, because of the impact of the LifeLine program on millions of participating Californians).</p>	Yes

B. Specific Claim:

CLAIMED						CPUC AWARD			
ATTORNEY AND ADVOCATE FEES									
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$
M. Kasnitz	2006	37.3	\$360	D.06-04-021	13,428	2006	33.6	\$360	12,042
M. Kasnitz	2007	29.4	\$390	D.07-06-040	11,466	2007	25.3	\$390	9,867
M. Kasnitz	2008	47.4	\$420	Attachment 4	19,908	2008	42.1	\$420	17,682

K. Weed	2007	7	\$270	Attachment 4	1,890	2007	7	\$270	1,890				
K. Weed	2008	31.6	\$290	Attachment 4	9,164	2008	31.6	\$290	9,164				
Karla Gilbride	2008	14.9	\$180	Attachment 4	2,682	2008	11	\$150	1,650				
Subtotal:					\$58,538	Subtotal:				\$52,295			
OTHER FEES													
Describe here what OTHER HOURLY FEES you are claiming (paralegal, travel, etc.):													
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$				
Paralegal	2006	.6	\$ 90	D.06-04-021	54	2006	.6	\$90	54				
Paralegal	2007	4.4	\$100	D.07-06-040	440	2007	3.4	\$100	340				
Paralegal	2008	5.8	\$110	Attachment 4	638	2008	5.8	\$110	638				
Subtotal:					\$1,132	Subtotal:				\$1,032			
INTERVENOR COMPENSATION CLAIM PREPARATION **													
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Year	Hours	Rate \$	Total \$				
M. Kasnitz	2008	7.4	\$210	Attachment 4	1,554	2008	5.4	\$210	1,134				
K. Weed	2008	10.2	\$145	Attachment 4	1,479	2008	5.8	\$145	841				
Paralegal	2008	1.8	\$ 55	Attachment 4	99	2008	1.8	\$ 55	99				
Subtotal:					\$3,132	Subtotal:				\$2,074			
COSTS													
Subtotal:					\$736.81	Subtotal:				\$174.56			
TOTAL REQUEST \$:					\$63,538.81	TOTAL AWARD \$:				\$55,575.56			
When entering items, type over bracketed text; add additional rows as necessary.													
* If hourly rate based on CPUC decision, provide decision number; otherwise, attach rationale.													
** Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.													

C. Attachments or Comments Documenting Specific Claim:

Attachment or Comment #	Description/Comment
1	Certificate of Service
2	General Comment and Request Regarding Standardized Intervenor Compensation Form
3	Reasonableness of Staffing and Number of Hours
4	Justification of Rates for Attorneys and Paralegals
5	Reasonableness of Costs
6	Detailed Records for Work on the Merits in 2006

7	Detailed Records for Work on the Merits in 2007
8	Detailed Records for Work on the Merits in 2008
9	Detailed Records for Work on Fees in 2008
10	Detailed Expense Records

D. CPUC Disallowances & Adjustments (CPUC completes):

#	Reason
2006-Kasnitz	Excessive hours based on the scope of the work and the allocation of tasks between Joint Consumers. (reduced 3.85)
2007-Kasnitz	Excessive hours based on the scope of the work and the allocation of tasks between Joint Consumers. (reduced 4.10)
2007-Law Clerk	Administrative task (reduced 1.00) "locate proposed decision for Melissa Kasnitz"
2008-Karla Gilbride	Double entry error on timesheet for work on 9-30-08 (reduced 3.9 hrs)
Costs	Excessive request for photocopying considering the electronic filing of documents in this proceeding. (reduced \$562.25)

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 (Y/N)?

No

B. Comment Period: Was the 30-day comment period waived (see Rule 14.6(c)(6)) (Y/N)?

Yes

FINDINGS OF FACT

1. Claimant has made a substantial contribution to Decisions (D.) 07-05-030 and D.08-08-029.
2. The claimed fees and costs, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The total of reasonable contribution is \$55,575.56.

CONCLUSION OF LAW

1. The claim, with any adjustment set forth above, satisfies all requirements of Public Utilities Code §§ 1801-1812.

ORDER

1. Claimant is awarded \$55,575.56.
2. Within 30 days of the effective date of this decision, the intervenor compensation fund shall pay claimant the total award. Payment of the award shall include interest at the rate earned on prime, three-month commercial paper as reported in Federal Reserve Statistical Release H.15, beginning January 7, 2009, the 75th day after the filing of claimant's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.
4. This proceeding remains open to address the implementation of pre-qualification.
5. This decision is effective today.

Dated April 16, 2009, at San Francisco, California.

MICHAEL R. PEEVEY
President

DIAN M. GRUENEICH
JOHN A. BOHN
RACHELLE B. CHONG
TIMOTHY ALAN SIMON
Commissioners

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:	D0904030	Modifies Decision? No
Contribution Decision(s):	D0705030 and D0808029	
Proceeding(s):	R0412001	
Author:	ALJ Karen Jones	
Payer(s):	Intervenor Compensation Fund	

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Disability Rights Advocates	10-24-08	\$63,538.81	\$55,575.56	No	Excessive hours, administrative task, double entry on timesheet, unreasonable photocopying expense, adjusted hourly rate.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Melissa	Kasnitz	Attorney	Disability Rights Advocates	\$360	2006	\$360
Melissa	Kasnitz	Attorney	Disability Rights Advocates	\$390	2007	\$390
Melissa	Kasnitz	Attorney	Disability Rights Advocates	\$420	2008	\$420
Katherine	Weed	Attorney	Disability Rights Advocates	\$270	2007	\$270
Katherine	Weed	Attorney	Disability Rights Advocates	\$290	2008	\$290
Karla	Gilbride	Attorney	Disability Rights Advocates	\$180	2008	\$180
Paralegal			Disability Rights Advocates	\$ 90	2006	\$ 90
Paralegal			Disability Rights Advocates	\$100	2007	\$100
Paralegal			Disability Rights Advocates	\$110	2008	\$110

(END OF APPENDIX)