

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

*Order Instituting Rulemaking Proceeding to
Consider Service Quality Rules for Wireless
Carriers*

Rulemaking 26-02-017
(Filed February 26, 2026)

**REPLY COMMENTS OF THE RURAL COUNTY REPRESENTATIVES OF CALIFORNIA
ON STAFF PROPOSAL**

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I. Introduction

Pursuant to Rule 6.2 of the California Public Utilities Commission (“Commission” or “CPUC”) Rules of Practice and Procedure, the Rural County Representatives of California (“RCRC”) submits timely reply comments to *Administrative Law Judge’s Ruling Issuing Staff Proposal* (“Ruling”), issued by Administrative Law Judge Thomas J. Glegola on August 19, 2026. RCRC is an association of forty rural California counties, and our Board of Directors is comprised of an elected Supervisor from each of our member counties.

II. Discussion

RCRC appreciates the opportunity to respond to opening comments. As discussed below, industry parties’ objections largely rest on aggregate measures of network performance, technical distinctions that do not necessarily reflect the service experienced by end-users, and assertions that additional oversight is unwarranted because existing networks already perform well. Those arguments reinforce, rather than diminish, the need for minimum wireless service quality standards that measure localized outcomes and provide the Commission with consistent information necessary to identify persistent voice service deficiencies.

A. The Record Supports Prompt Adoption of Enforceable Wireless Service Quality Standards

The wireless industry parties generally contend that existing wireless performance is sufficiently reliable and claims the record does not establish an addressable service quality problem warranting

regulation. CTIA, for example, asserts that wireless networks operated without Community Isolation Outages 99.84 percent of the time in each of the prior two years and argues that declining numbers of affected ZIP codes undermine the need for regulatory intervention.¹ CTIA further argues that the Commission must demonstrate not merely that outages occur, but that a defined category of outages can be prevented through regulation and that the benefits of regulation justify its costs.² T-Mobile repeatedly characterizes the Staff Proposal as unsupported by sufficient “evidence,” contending that the Commission must make determinations on a “credible record.”³ AT&T similarly characterizes the workshop record as “mixed and contested.”^{4, 5}

First, those arguments misconstrue the nature and purpose of this proceeding, which is quasi-legislative. The Commission is exercising its rulemaking authority to determine what prospective service quality policies, metrics, reporting requirements, and standards will best protect California consumers, promote reliable access to essential voice communications, and advance the public interest. The Commission is not adjudicating whether a particular carrier committed a past violation; it is developing prospective policy applicable to an industry providing an increasingly essential communications service. The fact that stakeholders disagree regarding the significance of certain data is inherent in the rulemaking process and does not, by itself, establish that the record is deficient or preclude the Commission from adopting prospective service quality standards and consumer protections.

The carriers’ framing also creates a circular problem. T-Mobile, for example, reasons that the Commission must first possess standardized information to assess localized performance before it can require its production.⁶ But one central purpose of standardized reporting is to have consistent information for future Commission oversight to rely on. The Commission, therefore, should not demonstrate the outcome of that measurement before deciding that the measurement itself serves the public interest. Industry parties assert that the information already available demonstrates exceptionally high performance. If standardized reporting and metrics ultimately confirm that at a more granular localized

¹ Page 3, *Comments of CTIA on Staff Proposal*, September 8, 2026.

² CTIA, page 3.

³ Pages 5, 7, *T-Mobile West LLC’s Opening Comments on Staff Proposal Included as Attachment A to the Administrative Law Judge’s Ruling Issuing Staff Proposal*, September 8, 2026.

⁴ Page 59, *Opening Comments of AT&T Mobility LLC (New Cingular Wireless PCS, LLC (U 3060 C); AT&T Mobility Wireless Operations Holdings, Inc. (U 3021 C); and Santa Barbara Cellular Systems, LTD. (U 3015 C)) (Collectively “AT&T”) on Staff Proposal and Responses to Data Requests*, September 8, 2026.

⁵ Even if we take carriers’ aggregate performance statistics at face value, it still does not answer the policy question of whether statewide or network-wide performance measures adequately identify and protect against persistent service deficiencies experienced by particular communities. They do not.

⁶ T-Mobile, page 2-3.

level, then the resulting data would confirm that carriers' are meeting applicable standards. If, however, standardized reporting reveals recurring localized deficiencies that aggregate statistics obscure, the Commission will have the information necessary to identify and address them. Neither outcome supports maintaining the present information gap.

Second, even assuming the high statewide and aggregate performance reported by industry parties, those figures do not establish that enforceable service quality standards are unnecessary. As RCRC and CforAT explained in opening comments, statewide and other aggregated performance measures can obscure persistent problems experienced in particular communities. Consumers experience wireless service locally, and an aggregate measure indicating high statewide availability does not establish that residents of every rural community have reliable access to service where and when it is needed. Indeed, Staff specifically identified the risk that a network could report 99 percent uptime while the remaining one percent of unavailability is concentrated in the same community for an extended period.⁷ RCRC, therefore, supported the Staff Proposal precisely because localized reporting can reveal service failures that statewide averages cannot.

Lastly, as RCRC and CforAT explained in opening comments, carriers have had repeated opportunities during this proceeding to provide operational, technical, and cost information; Communications Division Staff considered available information when developing its policy recommendations. The Commission can refine implementation details where appropriate without abandoning its basic framework or postponing adoption of meaningful, minimum wireless service quality standards.

B. Declining or Infrequent Community Isolation Outages Do Not Eliminate the Need for a 24-Hour Restoration Standard

Industry parties largely emphasize that the number of Cal OES Community Isolation Outages are declining, or that most outages are restored within 24 hours. Industry's own description of existing restoration performance supports, rather than undermines, the reasonableness of a 24-hour benchmark. The fact that the substantial majority of Community Isolation Outages are already restored within 24 hours demonstrates that the proposed standard is consistent with outcomes carriers routinely achieve. Rather than imposing an unrealistic requirement on ordinary network performance, the standard addresses the

⁷ Page 14, *Administrative Law Judge's Ruling Issuing Staff Proposal*, Rulemaking 26-02-017 (August 19, 2026), Attachment A.

comparatively small subset of extended outages that expose affected communities to the most serious risks from longer periods without reliable voice communications.

TURN reaches the same conclusion and notes that existing resiliency requirements, including backup power and emergency-response requirements, support the reasonableness of requiring restoration within that period.⁸ Cal Advocates likewise supports the 24-hour standard, reporting that 1,349 Community Isolation Outages exceeded 24 hours between 2023 and 2025.⁹ RCRC reiterates that an extended outage affecting a geographically isolated community does not become insignificant because statewide service remains available elsewhere. For a rural area with limited carrier choice or communications redundancy, the relevant measure is not whether the carrier’s statewide network remains operational, but whether consumers in that area can call 9-1-1, receive emergency alerts, and generally communicate during an emergency.

C. PUMA-Level Reporting Is an Appropriate Baseline

The Commission should adopt PUMAs as the baseline geographic unit while requiring county-level disaggregation for multi-county PUMAs.¹⁰ The need for additional granularity is particularly acute in rural places where population-based PUMAs can encompass several counties and thousands of square miles.¹¹ A PUMA-wide metric may identify that a reliability problem exists while potentially obscuring the particular county or community experiencing it. County-level reporting within multi-county PUMAs would preserve a standardized statewide framework while providing sufficient geographic resolution to identify recurring localized failures. This approach balances additional granularity while meeting the Staff Proposal’s essential objective of identifying localized service failures that are otherwise obscured by aggregate reporting.

D. Network Congestion and Capacity-Related Service Failures Should Not Be Excluded from Commission Review Merely Because Network Equipment Remains Operational

Various parties’ opening comments also reveal the need for the Commission to better define network availability, network outages, coverage, capacity, and usable service. RCRC agrees that clarification would improve the Staff Proposal. Cal Advocates makes this recommendation, observing that the Staff Proposal provides an uptime formula without fully defining when a network is “available.”¹²

⁸ Pages 4-5, *Opening Comments of The Utility Reform Network on the August 2026 Staff Proposal*, September 8, 2026.

⁹ Page 1-2, *The Public Advocates Office Opening Comments on the Staff Proposal*, September 8, 2026.

¹⁰ Pages 4-5, *Opening Comments of the Rural County Representatives of California and Center for Accessible Technology on Staff Proposal*, September 8, 2026.

¹¹ RCRC/CforAT Opening Comments at 5; TURN Opening Comments at 6–8.

¹² Cal Advocates, page 4.

TURN likewise recommends a word-based definition distinguishing customer connection, network uptime, and functionality.¹³ Clarification would improve the administration of the standard.

However, we caution against defining availability exclusively from the perspective of whether network equipment is technically operational. A distinction between network uptime and usable service may be meaningful for engineering and diagnostic purposes, but it should not create a regulatory blind spot where a carrier's equipment is technically functioning while customers are unable to complete calls. The Commission should define and measure these concepts according to the customer-relevant outcome each standard is intended to capture. The appropriate measurement should be based on whether customers can actually access and use the service the carrier represents as available. Ultimately, the Commission need not dictate how a carrier engineers or expands its network to recognize that recurring inability to complete calls is relevant service-quality information.

The immediate question is whether such failures should be reported so the Commission can identify persistent localized problems. They should. Where recurring congestion leaves customers unable to use voice service in an area a carrier purports to serve, the practical service-quality outcome is the same regardless of whether the carrier classifies the underlying cause as an "outage" or a "capacity constraint." The technical cause remains relevant to the diagnosis and remediation, but it should not determine whether the resulting service failure is visible to the Commission.

The carriers' own comments also demonstrate that wireless performance is measurable. They describe sophisticated systems and processes for monitoring network conditions, analyzing performance, identifying outages, and restoring service.¹⁴ The Commission's task, therefore, is not to determine whether wireless performance can be measured, but to establish which customer-relevant outcomes should be measured consistently for regulatory purposes.

E. The Commission Should Adopt Signal Propagation Mapping Because Existing Coverage Maps Do Not Provide the Public With Equivalent Information

Industry parties characterize the Staff Proposal's signal propagation map requirements as unnecessary in part because carriers already submit similar information to the FCC.¹⁵ But the existence of that reporting does not demonstrate that the Staff Proposal recommendations are unnecessary; it demonstrates that carriers already generate substantial portions of the underlying information. CTIA

¹³ TURN, pages 8-9.

¹⁴ T-Mobile, page 4.

¹⁵ AT&T, page 48.

acknowledges that the FCC’s Broadband Data Collection already requires wireless providers to file in-vehicle coverage maps and RSRP signal-level maps in increments of 10 dB or finer between -50 dBm and -120 dBm, and that those RSRP data are available for download.¹⁶ The existence of those federal reporting requirements undermines any suggestion that carriers would have to develop the underlying signal-propagation information from scratch solely to comply with the Staff Proposal. The appropriate cost inquiry is the incremental burden of adapting, presenting, and updating information that carriers already generate, not the cost of creating an entirely new technical capability. More importantly, the existence of technical data elsewhere does not establish that consumers are receiving equivalent information when choosing a wireless provider. These arguments do not address the core distinction between advertised technology coverage and usable signal strength for voice-based service. Signal propagation provides a quantifiable measure to help consumers assess whether service is likely to be usable where they actually need it, especially indoors. The Staff Proposal recognizes that distinction, explaining that advertised coverage does not necessarily equal usable service conditions.¹⁷

TURN also reinforces this position, supporting public signal propagation maps because consumers need accurate information regarding expected signal quality at their homes and other locations, and recommending standardized presentation to facilitate comparisons among carriers.¹⁸ SBUA similarly supports RSRP-based propagation maps because a business deciding whether wireless service can support its operations needs information concerning actual call reliability rather than merely the generation of wireless technology (e.g. 4G or 5G) advertised in an area.¹⁹ Cal Advocates further explains that propagation maps would provide local governments and residents with information useful for infrastructure planning, including identifying areas where additional wireless infrastructure may be necessary.²⁰

RCRC, therefore, continues to support adoption of the signal propagation mapping requirement. The Commission can address legitimate confidentiality concerns through aggregation and appropriate safeguards without withholding from consumers and local governments the information necessary to understand whether wireless service is likely to function where it is represented as available.

III. Conclusion

¹⁶ CTIA, page 23.

¹⁷ Staff Proposal, page 27.

¹⁸ TURN, pages 14-15.

¹⁹ Page 10, *Comments of the Small Business Utility Advocates on the Administrative Law Judge’s Ruling Issuing Staff Proposal*, September 8, 2026.

²⁰ Cal Advocates, pages 15-16.

Redundant communications options cannot be presumed. Where a community has only one usable wireless provider, limited wireline alternatives, substantial distances between population centers, challenging terrain or heightened wildfire exposure, a localized service failure can carry consequences disproportionate to the number of customers affected. The Commission need not conclude that California's wireless networks perform poorly in the aggregate to recognize the need for minimum service quality standards. A statewide availability percentage of 99 percent—or even 99.84 percent—does not reveal the public safety consequences experienced by a community if the remaining fraction of unavailability is repeatedly concentrated there. The fact that a communications failure may be uncommon does not make reliable access to emergency communications unimportant. The potentially severe consequences of an extended or recurring communications failure are precisely why reasonable minimum standards for reliability, restoration, transparency, and accountability serve the public interest. The Commission should therefore adopt minimum, enforceable wireless service-quality standards focused on the outcomes Californians should reasonably expect from an essential telecommunications service.

We appreciate your consideration of our comments and the recommendations contained herein.

Respectfully submitted,

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