

1 GAIL A. KARISH, Bar No. 244264
gail.karish@bbklaw.com
2 CHERYL A. LEANZA, DC Bar No. 457033
(*pro hac vice forthcoming*)
3 cheryl.leanza@bbklaw.com
GREGORY CAFFAS, DC Bar No. 90018763
4 (*pro hac vice forthcoming*)
gregory.caffas@bbklaw.com
5 DANIEL BERTONI, Bar No. 364994
daniel.bertoni@bbklaw.com
6 BEST BEST & KRIEGER LLP
300 South Grand Avenue, 25th Floor
7 Los Angeles, California 90071
Telephone: (213) 617-8100
8 Facsimile: (213) 617-7480

9 Attorneys for Amici Curiae
Rural County Representatives of California, The
10 Utility Reform Network, Communications Workers
of America, and the California State Association of
11 Counties

12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF CALIFORNIA

14
15 PACIFIC BELL TELEPHONE
COMPANY d/b/a AT&T
16 CALIFORNIA,

17 Plaintiff,

18 v.

19 JOHN REYNOLDS, in his official
capacity as President of the California
Public Utilities Commission; DARCI
20 E. HOUK, KAREN DOUGLAS,
21 MATTHEW BAKER, and CHRISTINE
HARADA, in their official capacities
22 Commissioners of the California Public
Utilities Commission; ROB BONTA,
23 his official capacity as Attorney General
of the State of California,

24 Defendants.
25
26
27
28

Case No. 3:26-cv-03148-LL-JAC

**PROPOSED AMICI'S NOTICE
OF MOTION AND MOTION TO
FILE AMICUS CURIAE BRIEF**

Date: July 31, 2026
Courtroom: 14B
Judge: Hon. Linda Lopez

PER CHAMBERS RULES, NO
ORAL ARGUMENT UNLESS
SEPARATELY ORDERED BY THE
COURT

NOTICE OF MOTION AND MOTION

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on July 31, 2026, or as soon thereafter as the matter may be heard in Courtroom 14B of the above-referenced court, proposed amici curiae Rural County Representatives of California (RCRC), The Utility Reform Network (TURN), Communications Workers of America (CWA), and the California State Association of Counties (CSAC) (collectively, Proposed Amici) will, and hereby do, move this Court for leave to file an amicus curiae brief in support of defendants. Attached as **Exhibit 1** to this Notice is the Proposed Amicus Curiae Brief and attached as **Exhibit 2** to this Notice is the Declaration of Gregory Caffas in support of the Amicus Curiae brief with its accompanying exhibits A-Q.

This motion is made following the conference of counsel that took place on June 17, 2026. Plaintiff represented it would not oppose the relief requested in this motion provided that (i) Plaintiff has a meaningful opportunity to respond to the arguments raised in Proposed Amici's brief in Plaintiff's reply in support of the preliminary injunction, and (ii) amici supporting both sides are considered on an equal basis. Because this motion will not be filed before the deadline for Plaintiff's reply, Plaintiff asked the Proposed Amici to share their proposed amicus brief in advance. Proposed Amici were unable to commit to sharing their proposed amicus brief within the requested timeframe. Defendants consent to the relief requested in this motion.

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1 This motion for leave is based on this notice, the attached memorandum of
2 points and authorities, and all pleadings and papers on file, any oral argument that
3 the Court should request, and any other matters the Court deems appropriate.

4
5 Dated: June 26, 2026

BEST BEST & KRIEGER LLP

6
7 By: /s/ Gail A. Karish

GAIL A. KARISH, CA Bar No. 244264

8 CHERYL A. LEANZA, DC Bar No. 457033

9 *(pro hac vice pending)*

GREGORY CAFFAS, DC Bar No. 90018763

10 *(pro hac vice pending)*

DANIEL BERTONI, Bar No. 364994

11
12 Attorneys for Amici Curiae Rural County
13 Representatives of California, The Utility Reform
14 Network, Communications Workers of America,
15 and California State Association of Counties
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BEST BEST & KRIEGER LLP
ATTORNEYS AT LAW
300 SOUTH GRAND AVE., 25TH FLOOR
LOS ANGELES, CA 90071

EXHIBIT 1

1 GAIL A. KARISH, Bar No. 244264
gail.karish@bbklaw.com
2 CHERYL A. LEANZA, Bar No. 457033
cheryl.leanza@bbklaw.com
3 GREGORY CAFFAS, Bar No. 90018763
gregory.caffas@bbklaw.com
4 DANIEL BERTONI, Bar No. 364994
daniel.bertoni@bbklaw.com
5 BEST BEST & KRIEGER LLP
300 South Grand Avenue
6 25th Floor
Los Angeles, California 90071
7 Telephone: (213) 617-8100
Facsimile: (213) 617-7480
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9 Attorneys for Amici Curiae
Rural County Representatives of California,
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**AMICUS CURIAE BRIEF OF
RURAL COUNTY
REPRESENTATIVES OF
CALIFORNIA, THE UTILITY
REFORM NETWORK,
COMMUNICATIONS WORKERS
OF AMERICA, AND THE
CALIFORNIA STATE
ASSOCIATION OF COUNTIES**

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BEST BEST & KRIEGER LLP
ATTORNEYS AT LAW

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INTRODUCTION

While Plaintiff Pacific Bell Telephone Company d/b/a AT&T California (AT&T) paints a picture of a conflict between federal and state regulation, in fact the California Public Utility Commission (CPUC) is appropriately and lawfully performing its role, explicitly protected by federal law, to further a policy of importance at both the federal and state level: universal service. Universal service is a core public interest mandate that seeks to ensure all people in the U.S. and all California residents, regardless of where they live, have access to reliable and affordable essential communications services. Congress has specifically authorized states to order common carriers to provide every resident with the ability to make intrastate phone calls (47 U.S.C. § 214(e)(3))—and California’s carrier-of-last-resort (COLR) and basic service regulations have long ensured that all California residents across this vast and varied state have access to these essential services. In seeking this preliminary injunction, AT&T gives only passing attention to these substantial public interests, and none at all to the role Congress explicitly envisioned for states in protecting them, offering a few short paragraphs of scant legal argument with no factual support to address the required showing of how its injunction would benefit the public. Instead, AT&T focuses almost exclusively on erroneous federal preemption arguments and the alleged irreparable harm California’s regulations present to its own business interests. Mem. of Points and Auth. in Support of Pl. Mot. for Preliminary Inj. at 4-5, 24-25, Dkt. No. 10-1 (Motion or Mot.).

AT&T’s Motion, which it claims is limited and targeted, will cause significant harm to consumers, particularly those who live in rural areas and are low-income. The alternate technologies, which might be sufficient in some places to meet the CPUC’s technology-neutral requirements, have not yet been shown to work well in all parts of California. And as Defendants explain, AT&T is not seeking to substitute an alternate technology; instead the Motion before the court is only the first step in

1 AT&T's overall goal to stop providing service altogether, service to many California
2 residents who have no other option. Def. Opp. to Mot. for Preliminary Injunction at
3 8:9-10, 9:20-24, Dkt. No. 31 (Opposition or Opp.). Rural County Representatives of
4 California (RCRC), The Utility Reform Network (TURN), Communications
5 Workers of America (CWA), and the California State Association of Counties
6 (CSAC) (collectively, Amici) therefore support Defendants' Opposition to the
7 Motion. Amici respectfully offer additional insight into the equities and public
8 interest to demonstrate that the picture AT&T paints is distorted; in fact, the equities
9 and public interest weigh heavily against granting the requested relief.

10 RCRC is an association of forty rural California counties,¹ governed by its
11 Board of Directors comprised of one elected supervisor from each of those member
12 counties. Incorporated in 1959, RCRC is a nonprofit, mutual benefit corporation that
13 works with its membership to advocate on behalf of rural issues and provide the rural
14 county perspective on a myriad of topics at the state and federal levels through both
15 the legislative and regulatory processes. A core tenant of RCRC is to promote a
16 greater understanding among policy makers about the unique challenges that face
17 California's small population counties.

18 TURN is a California nonprofit organization that champions the highest
19 quality phone service at the lowest prices possible for residential customers, low-
20 income households, and small businesses. TURN promotes racial and economic
21 equity advancement and accessibility through regulatory and legislative work to
22 achieve equitable, safe, reliable, resilient, and affordable communication services.
23 TURN advocates for policies that support the widespread deployment of high-quality
24 and affordable communications services.

25 _____
26 ¹ RCRC members are the Counties of Alpine, Amador, Butte, Calaveras, Colusa, Del
27 Norte, El Dorado, Glenn, Humboldt, Imperial, Inyo, Kings, Lake, Lassen, Madera,
28 Mariposa, Mendocino, Merced, Modoc, Mono, Monterey, Napa, Nevada, Placer,
Plumas, San Benito, San Luis Obispo, Santa Barbara, Shasta, Sierra, Siskiyou,
Solano, Sonoma, Sutter, Tehama, Trinity, Tulare, Tuolumne, Yolo, and Yuba.

1 CWA is a labor union representing workers throughout the country in
2 telecommunications and technology, including approximately 12,000 workers who
3 build, upgrade, and service wireline and wireless telecommunications networks for
4 providers in California. CWA also represents workers in news media, broadcast and
5 cable television, the airline industry, public service, manufacturing, and other fields.

6 Established in 1895, CSAC is a nonprofit corporation governed by elected
7 county supervisors. CSAC serves as a unified voice of all 58 of California's counties.
8 CSAC serves California counties by developing and equipping county leaders to
9 better serve their communities; effectively advocating and partnering with state and
10 federal governments for appropriate policies, laws, and funding; and communicating
11 the value of critical work being accomplished by county government.

12 **LEGAL STANDARD**

13 When considering a request for a preliminary injunction, the Court considers
14 whether Plaintiff has met its burden to show (1) it is likely to succeed on the merits;
15 (2) it will suffer irreparable harm absent relief; (3) the balance of the equities tips in
16 its favor; and (4) the injunction is in the public interest. *Winter v. Nat. Res. Def.*
17 *Council, Inc.*, 555 U.S. 7, 20 (2008). When, as here, a plaintiff seeks to enjoin the
18 government, the two final factors merge in the Court's analysis. *Padilla v. Immigr.*
19 *& Customs Enforcement*, 953 F.3d 1134, 1141 (9th Cir. 2020); *Drakes Bay Oyster*
20 *Co. v. Jewell*, 747 F.3d 1073, 1092 (9th Cir. 2013).

21 The public interest requires more than "cursory" analysis. *Winter*, 555 U.S. at
22 26-27. When a party seeking an injunction presents arguments concerning the public
23 interest, a court should "not grant a preliminary injunction, however, unless those
24 public interests outweigh other public interests that cut in favor of not issuing the
25 injunction." *All. for the Wild Rockies v. Cottrell*, 632 F.3d 1127, 1138 (9th Cir. 2011).
26 A court must be heedful of "some critical public interest that would be injured by the
27
28

1 grant of preliminary relief.” *Cal. Pharmacists Ass’n v. Maxwell-Jolly*, 596 F.3d 1098,
2 1114-15 (9th Cir. 2010) (citation modified).

3 **ARGUMENT**

4 **I. THE EQUITIES AND PUBLIC INTEREST FAVOR DENYING THE**
5 **MOTION**

6 AT&T devotes almost none of its Motion to the equities and the public interest,
7 making only four brief arguments over less than two pages. Mot. at 24-25. AT&T
8 claims urgency and harm if its Motion is not granted, but the opposite is true: grant
9 of AT&T’s Motion will harm the public interest, jeopardizing safety for California
10 residents who may lie in harm’s way, and who would be unable to obtain adequate
11 service during this litigation. Each of AT&T’s arguments misapprehends the
12 significance and consequences of AT&T’s request and ignores the interests of the
13 public itself in favor of AT&T’s business interests. As Amici discuss further below,
14 the public interest favors upholding regulatory standards that ensure all California
15 residents have access to essential communications. AT&T is also unlikely to succeed
16 on the merits because it incorrectly characterizes its California copper wire based
17 service as having inextricably mixed intrastate and interstate components.

18 **A. COLR Rules Implement Universal Service Policies, Ensuring**
19 **Connectivity Across a Vast and Diverse State and Providing**
20 **COLRs With Financial Support.**

21 A commitment to promote universal service is a cornerstone of this nation’s
22 telecommunications policy. The expressed purpose of the Federal Communications
23 Act of 1934 (Communications Act) is “to make available, so far as possible, to all
24 the people of the United States, without discrimination on the basis of race, color,
25 religion, national origin, or sex, a rapid, efficient, Nation-wide, and world-wide wire
26 and radio communication service with adequate facilities at reasonable charges.” 47
27 U.S.C. § 151. Universal service is critical to public safety, economic development,
28

1 education, civic discourse, and a legislatively mandated goal in California. Cal. Pub.
2 Util. Code § 709, 871-884.5 (the Moore Universal Telephone Service Act). Today
3 few modern activities can be imagined without access to a telephone. From 911
4 during a life threatening emergency, to work from home, calls to check on a neighbor
5 in need or to report a road hazard to 311, using specialized equipment provided by
6 California’s Deaf and Disabled Telecommunications Program; communications are
7 part of the fabric of everyday life. When these services are threatened, everything
8 that relies upon that connectivity is threatened.

9 California’s COLR rules guarantee that everyone in the state has access to
10 essential communications services. The public benefit of California residents’ broad
11 access to telecommunications services has been affirmed time and again by the
12 CPUC. *See, e.g.*, Decl. of Gregory Caffas in Support of Amicus Curiae Brief (Caffas
13 Decl.) Ex. A, at 15 (“The principles of universal service extend to all segments of the
14 public, not just the technologically sophisticated whose calling needs may be met by
15 wireless or other alternative technologies.”); Caffas Decl. Ex. B, at 3; *Assurance*
16 *Wireless USA, L.P. v. Reynolds*, No. 23-CV-00483-LB, 2023 WL 2780365, at *10
17 (N.D. Cal. Mar. 31, 2023), *aff’d*, 100 F.4th 1024 (9th Cir. 2024) (“[T]he public
18 interest is advanced by sustaining universal service, as the PUC’s rulemaking process
19 established.”). Basic service guaranteed by these rules ensures the ability to perform
20 fundamental acts of communication, which include making voice calls, accessing
21 911 and enhanced 911 emergency services, and accessing toll-free numbers. Caffas
22 Decl. Ex. A, at App’x A.

23 COLR providers have the obligation to serve all customers within their
24 territory, including extending facilities where necessary to provide service and to
25 obtain approval prior to withdrawing service. Opp. at 8:9-10. A COLR must
26 participate in California LifeLine, a program providing discounts to eligible
27 California residents. Caffas Decl. Ex. A, at App’x A, 4.

1 AT&T emphasizes its COLR obligations but omits any mention that COLR
2 providers, including AT&T, also have access to a variety of financial supports as a
3 result of their status. Indeed, the pairing of COLR obligations with financial
4 subsidies, recognizing the impacts of competitive services, goes back decades. The
5 principles of universal service are expressly envisioned in the Telecommunications
6 Act of 1996 (“1996 Act”) and form part of the framework for establishing COLR
7 regulation by the states.

8 Before 1996, universal service was largely funded through implicit cross-
9 subsidies within regulated monopoly rate structures, under which higher revenues
10 from urban and business customers helped offset the higher cost of serving rural and
11 remote areas. The 1996 Act transformed universal service from a regulatory principle
12 embedded in the monopoly-era telephone system into an explicit federal policy
13 framework designed to preserve affordable telecommunications service while
14 promoting competition. *FCC v. Consumers’ Rsch.*, 606 U.S. 656, 664-66, (2025).
15 Section 254 of the 1996 Act directed the Federal Communications Commission
16 (FCC) and a Federal-State Joint Board to establish “specific, predictable, and
17 sufficient” universal service support mechanisms so that consumers in rural, insular,
18 and other high-cost areas would have access to telecommunications services at rates
19 reasonably comparable to those available in urban areas. 47 U.S.C. § 254(b). The
20 1996 Act also expressly preserved a state role in advancing universal service and
21 designating carriers eligible to receive support. 47 U.S.C. §253(b) (“Nothing in this
22 section shall affect the ability of a State to impose, on a competitively neutral basis
23 and consistent with section 254 of this title, requirements necessary to preserve and
24 advance universal service”); 47 U.S.C. § 214(e)(2) (providing that states, “with
25 respect to intrastate services, shall determine which common carrier or carriers are
26 best able to provide” service to unserved areas and “shall order such carrier or carriers
27 to provide . . . service”); S. Rep. No. 230, 104th Cong., 2d Sess. 131, at 141 (1996)
28

1 (Joint Explanatory Statement) (Section 214(e)(3) “makes explicit the implicit
2 authority of . . . a State, with respect to intrastate services, to order a common carrier
3 to provide . . . service” if “no common carrier will provide universal service”).
4 Similar programs exist in California. Cal. Pub. Util. Code § 276.5(a); 270-285
5 (establishing advisory boards).²

6 Because AT&T and the other incumbent local exchange carriers (ILECs)
7 already operated as franchised monopoly providers throughout their service
8 territories, California designated them as COLRs, responsible for providing service
9 to any customer requesting it. This framework pairs COLR’s duty to serve with
10 universal service funding intended to sustain affordable service in high-cost areas
11 that competitive entrants are less likely to serve. 47 U.S.C. § 214(e).

12 **B. If AT&T’s Motion Is Granted, Customers Who Move or Lose**
13 **Service May Not Be Able to Obtain New Service, with Particular**
14 **Harm to Rural and Vulnerable Customers.**

15 AT&T claims that no existing customer will lose service and surmises that
16 customers who continue on copper landlines do so through inertia. Mot. at 25. But,
17 of course, any customer who moves to California or within California will not be able
18 to initiate new service with AT&T, potentially depriving them of access to 911 and
19 other critical communications.

20 California continues to experience significant residential mobility. Although
21 substantial numbers of people are moving out of the state, more than 400,000 people
22 still move into California from other states each year, and more than seven million
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25 ² See also CPUC, Universal Service (Mar. 2023), https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/communications-telecommunications_and_broadband/service_provider_information/universal-service.pdf. (summarizing six legislatively mandated universal service programs administered by the CPUC).
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1 people have moved into California since 2010.³ Indeed as of 2023, California ranked
2 in the top quartile of states attracting the most movers from different states, with
3 422,000 residents moving there from out-of-state just that year.⁴ These new residents
4 require access to essential communications services wherever they
5 settle. California's population has also significantly increased in areas at wildfire
6 risk; 12.7% of California's population now lives in high-growth wildland-urban
7 interface census tracts, with the largest concentrations of growth occurring in
8 Southern California and the Bay Area, demonstrating that California residents
9 continue moving into communities where reliable communications infrastructure is
10 especially critical during emergencies.⁵ Indeed, in 2020, California was one of the
11 three states with the highest number of people moving into areas affected by fire.⁶

12 As explained below, obtaining service in rural areas is difficult, expensive, or
13 impossible except from a COLR. *See infra* Section I.B.2. Granting relief for AT&T
14 would impact a significant portion of the geography of California. This risk is
15 especially high for California residents in rural and mountainous areas. *See* Caffas
16 Decl. Ex. C (AT&T's service area shown in light orange). Moreover, granting relief

17 _____
18 ³ Hans Johnson and Eric McGhee, *Who's Leaving California—and Who's Moving*
19 *In?*, Public Policy Institute of California (Jan. 21, 2026)
20 <https://www.ppic.org/blog/whos-leaving-california-and-whos-moving-in/>.⁴ Owen
21 G. Denoeux and Mehreen S. Ismail, *States with High Numbers of In-Movers From*
22 *Other States Didn't Necessarily Have High Shares of Recent Arrivals in 2023*, U.S.
23 Census Bureau (April 29, 2025)
24 <https://www.census.gov/library/stories/2025/04/state-newcomers.html>.

25 ⁴ Owen G. Denoeux and Mehreen S. Ismail, *States with High Numbers of In-*
26 *Movers From Other States Didn't Necessarily Have High Shares of Recent Arrivals*
27 *in 2023*, U.S. Census Bureau (April 29, 2025)
28 <https://www.census.gov/library/stories/2025/04/state-newcomers.html>.

⁵ Slade Laszewski et al, 2024 Environ. Res. Commun. 6 031004, *Yearly population*
data at census tract level revealed that more people are now living in highly fire-
prone zones in California, USA, [https://iopscience.iop.org/article/10.1088/2515-](https://iopscience.iop.org/article/10.1088/2515-7620/ad2a93/pdf)
[7620/ad2a93/pdf](https://iopscience.iop.org/article/10.1088/2515-7620/ad2a93/pdf).

⁶ Laura Bliss and Marie Patino, Bloomberg, *More Americans Are Moving Into Fire-*
Risky Areas, Bloomberg (Sept. 24, 2021)
<https://www.bloomberg.com/graphics/2021-moves-into-fire-zones/>.

1 for AT&T could prompt other ILECs in the state to seek similar relief, cumulatively
2 affecting tens of thousands of customers beyond AT&T's COLR footprint.⁷

3 The rural counties represented by RCRC represent about 60% of California's
4 landmass, ranging from rugged coast to forested mountains, deserts to farmlands.
5 These rural counties are home to nearly 5.8 million people whom the natural
6 environment and low population density makes less attractive markets with fewer
7 incentives for robust competition to develop. The lack of competition in these areas
8 means that COLR rules ensure the very existence of affordable basic service for these
9 California residents. And, although these concerns are particularly acute for
10 California residents living in rural counties, every county in California, except San
11 Francisco, has rural or semi-rural areas where broadband internet and cellular service
12 are limited at present, especially when electrical outages occur. *See* Caffas Decl.
13 Ex. E, at 2.

14 Low-income households will also lose service, as AT&T is not proposing to
15 offer service with LifeLine subsidies. Opp. at 10. Once disconnected from AT&T's
16 LifeLine service, affected customers will have to reinitiate service and will not be
17 able to reconnect with AT&T, if AT&T's Motion is granted. Low-income people are
18 more likely to lose service because of their inability to pay.⁸

19 The California LifeLine Program is the State's principal mechanism for
20 ensuring that qualifying low-income households and foster youth can afford essential
21 telecommunications service. Through the program, the CPUC provides a subsidy to
22 eligible participants for wireline, fixed Voice over Internet Protocol (VoIP), or
23 mobile voice and broadband services. *See* Caffas Decl. Ex. F, at 7. As of
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25 ⁷ In 2025, the FCC reported that California had 489,000 non-VoIP telephone service
26 landlines. *See* Caffas Decl. Ex. D. at 12.

27 ⁸ *See* Pew Research Center, *U.S. Smartphone Use in 2015*, ch. 1 (Apr. 1, 2015),
28 <https://www.pewresearch.org/internet/2015/04/01/chapter-one-a-portrait-of-smartphone-ownership/>.

1 December 31, 2025, approximately 1.8 million California households were enrolled
2 in the program, including 80,513 wireline subscribers. *Id.* at 9. As the CPUC
3 explains, a service without the lower, subsidized LifeLine pricing is not really
4 available “merely because a commercial alternative exists within the census block.”
5 Opp. at 10. Once cut off under the proposed Motion, low-income people will not be
6 able to reestablish service.

7 Most recently, AT&T has sought permanent discontinuance for multiple areas
8 around the country, including California, because it will not replace plants damaged
9 by natural disaster or copper theft. Caffas Decl. Ex. G at 1-4. If the FCC grants that
10 request and AT&T’s Motion before this Court is granted, customers who lost service
11 due to these emergencies will also not be able to re-establish service.

12 Finally, because the California residents who rely on COLR services are often
13 those who are older, disabled, or low income, the public interest supports an orderly
14 technology transition that must not leave them behind. Community members who are
15 deaf, blind, or otherwise disabled rely on accessible technology and programs, such
16 as teletypewriter or TTY, California Connect, and the California Relay Service,
17 which may not be compatible with internet-based alternatives. Caffas Decl. Ex. H at
18 9-11.

19 **C. AT&T’s Current Landline Offering Is Needed Because Alternate**
20 **Services Are Not Universally Available.**

21 **1. Wireless and VoIP Services Often Fail, Particularly During**
22 **Emergencies.**

23 AT&T surmises that customers who continue to purchase copper landline
24 service do so through “inertia.” Mot. at 4. In fact, in many cases, the modern
25 technologies that many customers prefer are not available or do not reliably function;
26 therefore it is no surprise customers continue to purchase traditional service. While
27 it is possible that these technologies could meet needed public safety and service
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1 quality standards in some areas, in many places or under certain circumstances, the
2 alternate technologies that AT&T claims consumers could rely on if its Motion were
3 granted are not adequate. Mobile service is particularly vulnerable, and both mobile
4 voice services and AT&T's proposed alternative, Phone-Advanced service, rely on
5 mobile networks to function.

6 Much of AT&T's service territory overlaps with high fire threat districts where
7 wireless service may be undependable. In the event of a natural disaster, the failures
8 of wireless and internet-based communications show that these technologies do not
9 adequately serve California residents, particularly those living in rural areas and
10 especially when electrical outages occur.

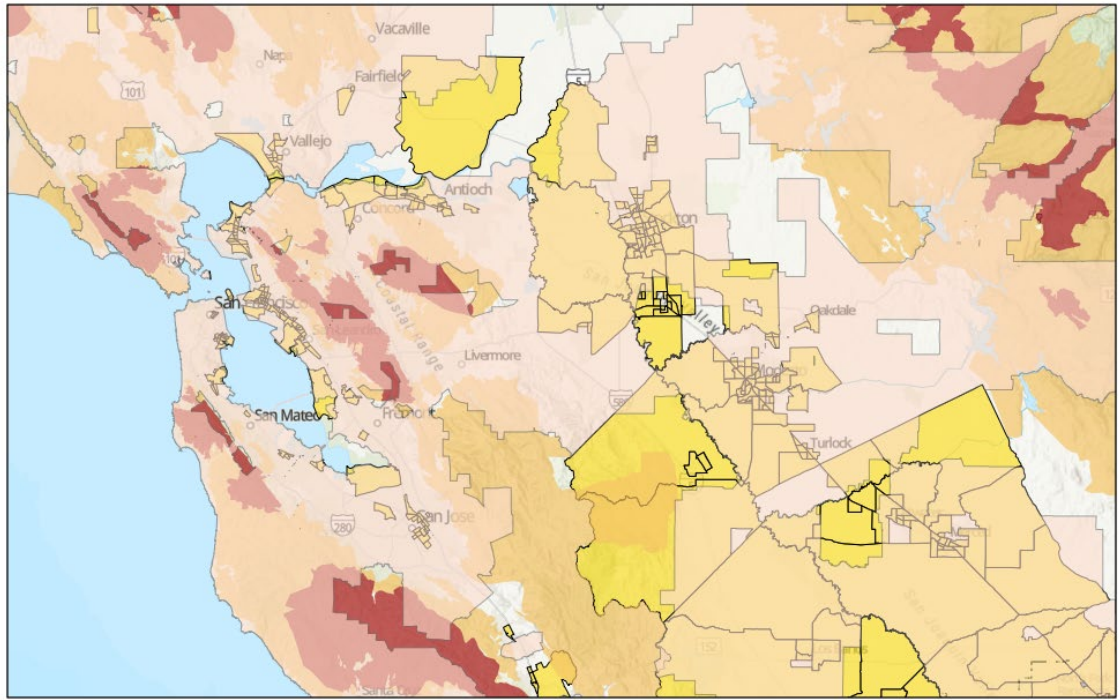
11 California's rural areas are often at high disaster risk, from wildfires to
12 flooding to mudslides. Losing access to emergency communications can be a matter
13 of life or death. Wireless coverage—even if theoretically available as shown on a
14 coverage map—is in practice limited, or dependent on other conditions such as tower
15 height, equipment quality, clear line of site, coverage capacity, capacity demands,
16 terrain, vegetation, end user location, and whether the end user location is fixed or
17 mobile. Such wireless capacity as exists for local residents may be further strained
18 during peak tourist seasons in California's many recreational areas when there is
19 increased demand on the network. In these circumstances, retiring existing
20 infrastructure without a replacement service that meets COLR requirements would
21 disrupt the 911 routing system and emergency alert systems, including reverse 911,
22 inhibiting local governments' ability to provide life-saving emergency services.
23 Caffas Decl. Ex. I, at 22-23. In 2024, over a million 911 calls were placed in
24 California over landlines. Caffas Decl. Ex. J, at 5.

25 Danger lies in the gap between the theoretical availability of coverage and the
26 practical reality experienced by California residents on the ground. As the following
27 maps show, AT&T's service area overlaps with high fire threat districts throughout
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California:

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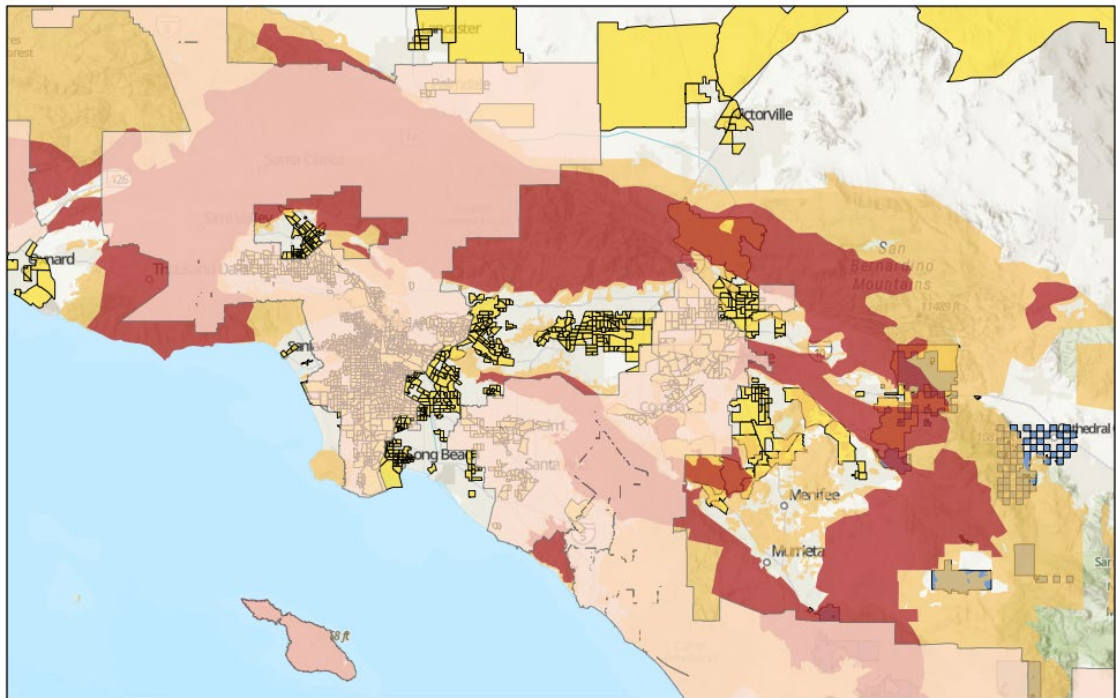
High Fire Threat, DAC, and ATT Service Territory (Bay Area + Central)



5/1/2026
COLR_Territories CPUC High Fire Threat District (Tiers 2 & 3) CA tribal boundaries
PACIFIC BELL Tier 2 DAC (SB535tracts2022)
Tier 3

1:1,278,364
0 5 10 20 mi
0 12.5 25 50 km
Cal FIRE, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, 11

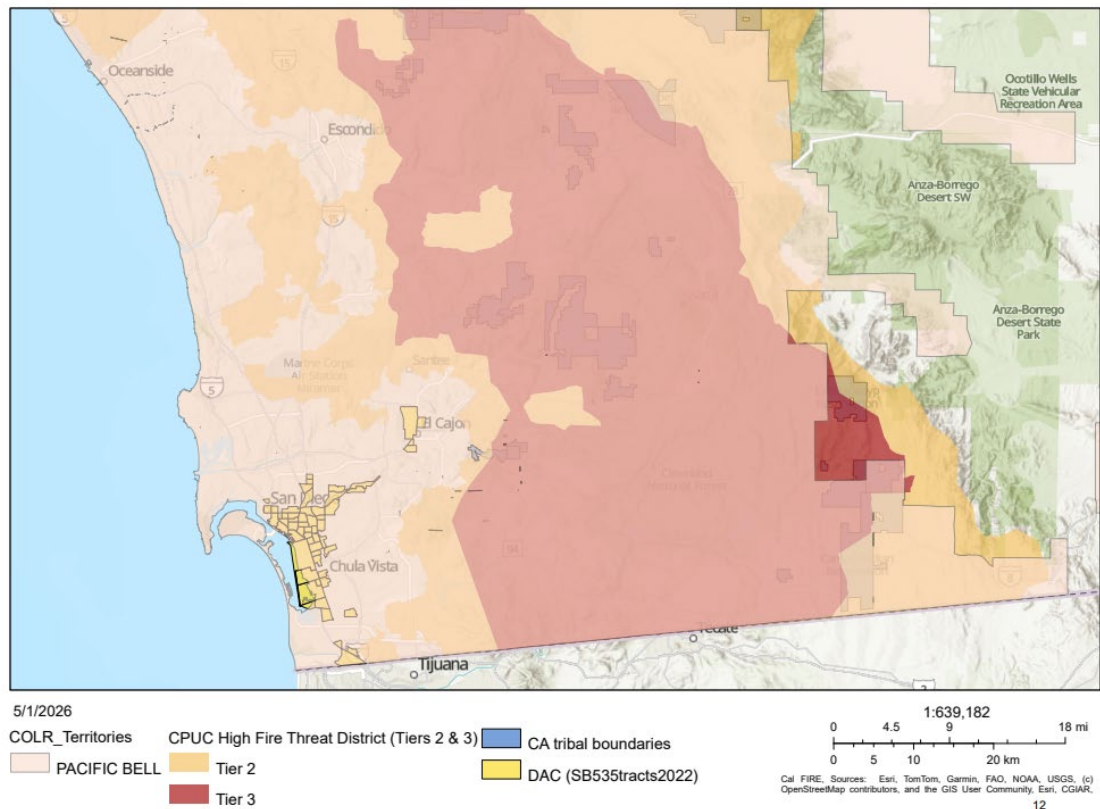
High Fire Threat Districts, DAC, and ATT Service Territory In Southern California



5/1/2026
COLR_Territories CPUC High Fire Threat District (Tiers 2 & 3) CA tribal boundaries
PACIFIC BELL Tier 2 DAC SB535tracts2022
Tier 3

1:1,278,364
0 5 10 20 mi
0 12.5 25 50 km
Cal FIRE, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, 10

High Fire Threat, DAC, and ATT Service Territory (Greater San Diego)



Caffas Decl. Ex. K, at 9-12.

When one cell tower fails or loses power, traffic shifts to neighboring towers, leading to additional congestion, which is especially dangerous for callers during an emergency. Caffas Decl. Ex. L, at 27. These concerns are not theoretical. During wildfires, public safety power shutoffs and fire damage took off-line hundreds of cell sites across the state, with the result that “wireless communications failed at critical times during wildfire and PSPS events which resulted in many wireless customers being unable to make calls during times of emergency or disaster.” Caffas Decl. Ex. M, at 47. As a result of these cell sites being out of service, hundreds of thousands of California residents were left without a wireless service, resulting in millions of blocked calls, including over 2 million blocked calls in Butte County and Paradise during the 2018 Camp Fire and over 4 million blocked calls in Southern California during the 2018 Hill and Woolsey Fires. *Id.* at 49-50.

1 In the fall of 2019, the FCC’s daily Disaster Information Reporting System
2 reports—for which participation by wireless providers is voluntary—showed that
3 2.5% of *all cell sites in California* were out of service on October 27, 2019; 3.3% on
4 October 28, and 1.8% on October 29. Caffas Decl. Ex. N. Marin County was
5 particularly hard hit, losing *over half* of its cell sites on October 28, 2019, due to
6 power outages. *Id.*

7 Attempting to prevent similar outcomes in future emergencies, the CPUC has
8 mandated resiliency standards for wireless and wireline providers, which included
9 maintaining 72 hours of backup power for infrastructure serving Tier 2 and Tier 3
10 high fire threat districts. Caffas Decl. Ex. M, at 145-46; Caffas Decl. Ex. O, at 103.
11 Despite these requirements, site visits revealed that nearly one-third (1,509 of 5,388)
12 of wireless facilities in Tier 2 and Tier 3 high fire threat districts lacked the requisite
13 72 hours of backup power. Caffas Decl. Ex. P, at 36. By comparison, less than
14 2.2 percent (276 of 12,737) of wireline facilities lacked adequate backup power. *Id.*

15 During the January 2025 Eaton and Palisades Fires in Los Angeles County,
16 “[c]ellular service was reduced quickly during the incident due to power outages and
17 eventually became obsolete for hours, delaying critical messages for resource orders,
18 tactical direction, and coordination with other agencies.”⁹ A separate review
19 sponsored by the Los Angeles County Board of Supervisors found that “power
20 interruptions hindered residents’ access to emergency notifications, especially in
21 areas with limited cellular backup or where internet service was compromised. In
22 some neighborhoods, automated call systems failed to operate due to the loss of
23 electricity. . . .”¹⁰

24 _____
25 ⁹ L.A. City Fire Dep’t, Palisades Fire After-Action Review Report at 51 (Jan. 7,
26 2025),
https://ens.lacity.org/lafd/lafdreportarchv/lafdlafdreport1864192431_10212025.pdf.

27 ¹⁰ McChrystal Group, After-Action Review of Alert Notification Systems and
28 Evacuation Policies for the Eaton and Palisades Fires at 51 (Sept. 26, 2025),
<https://file.lacounty.gov/SDSInter/bos/supdocs/207915.pdf>.

1 When the power is out, customers who rely on wireless and VoIP services for
2 telephone service may become unreachable by reverse 911 and other emergency alert
3 systems. Such problems do not occur with the same level of regularity on the legacy
4 copper network, which is less sensitive to power outages as it does not require users
5 to have back up power in their homes. Indeed, lack of reliability in IP-based systems
6 is completely unaddressed in AT&T's repeated conclusory claims that such systems
7 are "more reliable" than legacy copper networks. Mot. at 1:19, 5:17, 22:23-24, 23:12-
8 13, 25:19-20. In practice, customers have noted that supposed alternatives to
9 traditional service, such as VoIP, can interfere with emergency alert systems, and fail
10 during power outages. Caffas Decl. Ex. H, at 11. It is the proper role of state
11 regulation to determine when service is sufficient to meet significant public safety
12 and welfare needs.

13 These failures of possible replacement technologies demonstrate both the
14 importance of the existing technology that COLR providers maintain as well as the
15 need for any replacement technology to meet basic functionality standards. It is little
16 wonder that many customers concerned about emergency communications in high
17 fire threat districts retain their traditional landline service. If AT&T's Motion is
18 granted, no customer moving to a high threat district will be able to obtain service,
19 and, as the Defendants make clear, AT&T's Motion is only the first step toward
20 ending such service altogether. Opp. at 9:18-24.

21 **2. Wireless Services Are Otherwise Limited.**

22 Not only is wireless service unreliable in emergencies, but it also often fails to reach
23 or serve consumers in other ways. For example, in AT&T's Application before the
24 FCC seeking to discontinue its existing copper line service, AT&T relied upon the
25 FCC's National Broadband Map to indicate the widespread availability of wireless
26 service—but reliance on the National Broadband Map cannot demonstrate an
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1 adequate level of service. Caffas Decl. Ex. H, at 4-5. That map is based on provider-
2 provided data, which can be inaccurate. *Id.*

3 More importantly, the standard for the FCC's National Broadband Map is
4 explicitly only **outdoor** coverage, 47 C.F.R. § 1.7004(c)(5), rendering the map
5 unreliable the moment a consumer steps inside. Further, wireless service outages are
6 not uncommon. To provide just a few recent examples:

- 7 • In June of 2024, a software bug reported nationwide outages, with over
8 70,000 AT&T wireless customers reporting service outages, leaving
9 them without access to emergency services.
- 10 • In August of 2025, a fire at an AT&T facility in Gardena, California,
11 disrupted voice services and led to an inability to reach 911 services.
- 12 • In March of 2026 a weeks-long AT&T outage left residents of Shelter
13 Valley unable to communicate with family or emergency services.

14 Caffas Decl. Ex. H, at 4-6.

15 **D. Granting AT&T's Motion Will Harm Workers and Allow AT&T**
16 **to Dismantle or Stop Maintaining the Network.**

17 As highlighted by the CPUC, AT&T does not seek to offer service through a
18 more modern technology, it seeks to end its obligation to offer any service at all. Opp.
19 at 7-9. AT&T explains it seeks to stop maintaining and begin dismantling its network
20 immediately, Mot. at 22. Not only does AT&T state that granting its Motion would
21 enable it to dismantle the network, Mot. at 22 (describing copper recycling), but it
22 would likely result in harm to workers' jobs, thus reducing repair and maintenance
23 to the network they maintain—putting the public in jeopardy if the ultimate
24 complaint on the merits is rejected during the pendency of this litigation.

25 Incumbent providers have significantly reduced their workforces in recent
26 years, with fewer technicians now serving larger geographic territories. The records
27 of CWA, the union representing AT&T workers in California, indicate that the total
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1 CWA-represented wireline employment at AT&T in California has been cut by more
2 than half in less than a decade, from approximately 16,000 workers in October 2017
3 to approximately 7,000 in April 2026. Of the total cuts, 76% were technicians. This
4 dramatic reduction in the technician workforce has already manifested in serious
5 service quality consequences for California customers. As experienced technicians
6 depart through retirement, other attrition, and layoffs, service quality has continued
7 to deteriorate. Moreover, AT&T routinely shuffles technicians across the state during
8 inclement weather and rainy seasons to address demand it can no longer meet with
9 local staff, leaving customers, particularly in rural areas, without service for weeks
10 at a time.

11 The elimination of COLR obligations will mean even if alternate technologies
12 can meet the California regulatory standard, AT&T will nonetheless be permitted to
13 fully abandon rural and mountainous parts of California, even as it has refused to
14 reach agreement on an updated COLR framework for an IP world. Without the legal
15 obligation to serve all customers in a territory, AT&T will have no regulatory
16 incentive to maintain the technician workforce necessary to support repair and
17 replacement of existing infrastructure, as it continues to exit more territory without
18 an adequate replacement.

19 AT&T has previously cited a shortage of technicians as a justification for
20 noncompliance with CPUC service quality standards. Caffas Decl. Ex. Q, at 11.
21 (“AT&T stated . . . that it does not think the [Out of Service Repair Interval (OOS)]
22 metric is a valid indicator of service quality and is unwilling to invest in hiring and
23 training the number of technicians it stated is needed to bring them into compliance
24 with the OOS standard.”). However, that shortage is itself the product of AT&T’s
25 own cost-cutting decisions. AT&T’s failure to employ sufficient technicians to meet
26 service quality requirements is a financial decision, not a technological inevitability.
27 If the Motion is granted, AT&T will begin removing its network from regions it
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1 considers unused, but for which it has not obtained permission to stop acting as the
2 COLR.

3 **E. FCC Determinations as to Public Convenience Are of No Import.**

4 The Court should reject AT&T's claim that the FCC's conclusions regarding
5 the public convenience and necessity constitute proof that "facilitating
6 grandfathering serves the public interest." Mot. at 25:2-10. AT&T offers no support
7 for its claim that one governmental body's regulatory decision can be conclusive of
8 the ultimate public interest—and their argument would give federal administrative
9 agencies a degree of deference beyond even that rejected by the Supreme Court in
10 *Loper Bright Enters. v. Raimondo*, 603 U.S. 369 (2024). Indeed, as explained above,
11 the CPUC, the very "state commission" authorized by Congress to impose universal
12 service mandates with respect to intrastate calling, has repeatedly determined that the
13 public interest demands COLR rules. *Cf. Assurance Wireless*, 2023 WL 2780365 at
14 *10 ("[T]he public interest is advanced by sustaining universal service, as the PUC's
15 rulemaking process established."). Further, the kind of policy arguments that AT&T
16 proffers in justifying its Motion are exactly the kind of decisions that should be made
17 by legislative or regulatory bodies granted that authority by state legislatures.¹¹
18 AT&T's position would effectively eliminate independent judicial consideration of
19 the public interest from any suit seeking to enjoin governmental action that was taken
20 nominally in the public interest.

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25 ¹¹ In fact, the California legislature considered but did not adopt AB 470 last year, a
26 bill that would have adopted a framework and regulatory mandate for the CPUC to
27 adopt a process for telephone corporations to petition the CPUC to amend their
28 status as a carrier of last resort (COLR) in designated areas. *See* Senate
Appropriations Analysis (Aug. 15, 2025),
[https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202520260
AB470](https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202520260AB470).

1 **F. Demonstrating Preemption Does Not Automatically Satisfy the**
2 **Public Interest Prong.**

3 Amici do not agree that AT&T is likely to succeed on the merits for the reasons
4 outlined in the Defendants’ Opposition, but even if it were, that does not dictate the
5 Court’s determination on the public interest prong. AT&T argues that the public
6 interest weighs in its favor on the Supremacy Clause violation that AT&T has
7 identified. Mot. at 24:21-25:1. AT&T errs insofar as it suggests that demonstrating
8 likely preemption automatically satisfies the public interest prong. *See eBay v.*
9 *MercExchange, LLC*, 547 U.S. 388, 391-94 (2006). Even the two cases AT&T cites
10 do not support that proposition. See Mot. at 24:21-25:1 (citing *United States v.*
11 *California*, 921 F.3d 865, 893 (9th Cir. 2019) and *Am. Trucking Ass’ns*, 559 F.3d
12 1046, 1059-60 (9th Cir. 2009)). Instead, in each, the Ninth Circuit recognizes and
13 weighs the harm from a potential constitutional violation against other harms and
14 interests. The Court in *American Trucking Associations, Inc. v. City of Los Angeles*
15 stated clearly that, in determining that the public interest favored injunctive relief, it
16 “d[id] not denigrate the public interest represented by the Ports, that must be balanced
17 against the public interest represented in Congress’ decision to deregulate the motor
18 carrier industry, and the Constitution’s declaration that federal law is to be supreme.”
19 *Am. Trucking Ass’ns*, 559 F.3d at 1059-60. And in *United States v. California*, the
20 Court did not state baldly that a preemption argument renders other public interest
21 considerations irrelevant. Rather, the Court observed that “the United States did not
22 present compelling evidence” of harm “other than relying on general
23 pronouncements that a Supremacy Clause violation alone constitutes sufficient harm
24 to warrant an injunction.” *United States v. California*, 921 F.3d at 894. The Court
25 then remanded to the district court to weigh the public interest considerations raised
26 by the state and its amici. *Id.*

1 **II. AT&T IS UNLIKELY TO SUCCEED ON THE MERITS BECAUSE**
2 **STATES RETAIN AUTHORITY OVER INTRASTATE SERVICE**

3 Amici support the arguments made by Defendants regarding AT&T's
4 unlikelihood of succeeding on the merits. Opp. at 13-22. AT&T's assertion that its
5 current service is jurisdictionally mixed and its interstate component is "inextricable"
6 from its intrastate functionality is also incorrect for the additional following reasons.
7 The basic flaw in this argument is readily apparent. In AT&T's view, *any* telephone
8 network is inherently "indivisible," economically if not technologically. There is thus
9 no such thing as truly intrastate service, *ever*, and no scope for state action that is not
10 subject to preemption by the FCC. This would have the so-called "impossibility
11 exception" swallow the rules *actually enacted by Congress*, and render numerous
12 provisions of the 1996 Act superfluous, including Section 214(e). That plainly goes
13 too far. *See Louisiana Pub. Serv. Comm'n v. FCC*, 476 U.S. 355, 374-75 (1986).

14 Moreover, AT&T's claim is belied by its own service offerings. Mot. at 3:12-
15 14 (citing Fahmy Decl. ¶¶ 10-11); *id.* at 14:18-16:8. AT&T markets traditional local
16 landline service as a standalone offering, with long-distance calling available as an
17 optional feature rather than an inseparable component of the service, demonstrating
18 that local exchange service can be provided independently of interstate
19 telecommunications.¹²

20 In justifying its jurisdictionally mixed claim, AT&T's states that "[m]odern
21 networks are rarely divided into discrete intrastate and interstate systems," Mot. at
22 14. CPUC correctly explains why, factually, these services can be divided into
23 interstate and intrastate services. Opp. at 11-12. However, implying that the modern
24 evolution of communications has uniquely brought all calling into a single company

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26 ¹² See AT&T Home Phone Service, <https://www.att.com/home-phone/landline/> (last
27 visited June 24, 2026); see also AT&T Corp. Service Guide at 40,
28 https://serviceguide.att.com/tariff/consumer/manage/secure/files/CA_SG_RLD_AT_TCORPS_cancelled_b501xn98hlzhou2t.pdf (Section 6.3.3 differentiating AT&T's optional intrastate calling plan from its interstate service).

1 and infrastructure is not accurate. The offering of combined but separable local and
2 long distance service together over common plant by a single company—the original
3 AT&T Bell System—has been the dominant form of service for most of history, and
4 was true when Congress divided telecommunications regulation into a “dual system”
5 in 1934. *Opp.* at 2.¹³ For AT&T to present the combined offering of local and long
6 distance service as a factual distinction justifying federal preemption over intrastate
7 matters turns the history and Congressional policy of the Communications Act on its
8 head.

9 Congress has also expressly preserved state authority over telecommunications
10 services used to advance universal service goals, even where those services may
11 involve interstate communications. Under 47 U.S.C. § 332(c)(3), states may impose
12 requirements necessary to ensure the universal availability of telecommunications
13 service at affordable rates, including on commercial mobile services that substitute
14 for landline telephone exchange service. *See also* 47 U.S.C. §§ 214(e), 254(b). This
15 provision reflects Congress’s recognition that the presence of interstate
16 communications does not preempt state authority over services that fulfill universal
17 service obligations. AT&T’s sweeping theory would improperly nullify this
18 preserved state authority and convert any service capable of carrying interstate traffic
19 into an exclusively federal matter, contrary to the Communications Act’s allocation
20 of federal and state responsibilities. Section 214(e)(3) similarly directly authorizes
21 states to identify and require common carriers to provide service to unserved areas.
22 47 U.S.C. § 214(e)(3). This authorization extends to states’ ability to ensure areas do
23 not become unserved. *See also* 47 U.S.C. § 153(48) (defining “State commission” as
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25 ¹³ *See also*, U.S. Bureau of the Census, Historical Statistics of the United States,
26 Colonial Times to 1957, ch. R, at 471 (1960)
27 https://www2.census.gov/library/publications/1960/compendia/hist_stats_colonial-1957/hist_stats_colonial-1957-chR.pdf (“The Bell System provides the great bulk
28 of local exchange and interexchange or toll telephone facilities and service in the United States.”).

1 the authority which “has regulatory jurisdiction with respect to intrastate operations
2 of carriers”).

3 **CONCLUSION**

4 For these reasons, Amici support denial of AT&T’s Motion for a preliminary
5 injunction.

6 Dated: June 26, 2026

BEST BEST & KRIEGER LLP

7 By: /s/ Gail A. Karish

8 GAIL A. KARISH
9 CHERYL A. LEANZA
GREGORY CAFFAS
DANIEL BERTONI

10 Attorneys for Amici Curiae
11 Rural County Representatives of
12 California, The Utility Reform
13 Network, Communications Workers
14 of America, and the California State
15 Association of Counties

BEST BEST & KRIEGER LLP
ATTORNEYS AT LAW

EXHIBIT 2

1 GAIL A. KARISH, Bar No. 244264
gail.karish@bbklaw.com
2 CHERYL A. LEANZA, DC Bar No. 457033
(*pro hac vice forthcoming*)
3 cheryl.leanza@bbklaw.com
GREGORY CAFFAS, DC Bar No. 90018763
4 (*pro hac vice forthcoming*)
gregory.caffas@bbklaw.com
5 DANIEL BERTONI, Bar No. 364994
daniel.bertoni@bbklaw.com
6 BEST BEST & KRIEGER LLP
300 South Grand Avenue
7 25th Floor
Los Angeles, California 90071
8 Telephone: (213) 617-8100
Facsimile: (213) 617-7480

9 Attorneys for Amici Curiae
10 Rural County Representatives of California, The
11 Utility Reform Network, Communications Workers
of America, and the California State Association of
Counties

12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF CALIFORNIA
14

15 PACIFIC BELL TELEPHONE
16 COMPANY d/b/a AT&T
CALIFORNIA,

17 Plaintiff,

18 v.

19 JOHN REYNOLDS, in his official
20 capacity as President of the California
Public Utilities Commission; DARCIE
21 L. HOUK, KAREN DOUGLAS,
MATTHEW BAKER, and CHRISTINE
22 HARADA, in their official capacities
Commissioners of the California Public
23 Utilities Commission; ROB BONTA,
his official capacity as Attorney General
24 of the State of California,

25 Defendants.
26
27
28

Case No. 3:26-cv-03148-LL-JAC

**DECLARATION OF GREGORY
CAFFAS IN SUPPORT OF BRIEF
OF AMICI CURIAE**

Date: July 31, 2026
Courtroom: 14B
Judge: Hon. Linda Lopez

PER CHAMBERS RULES, NO
ORAL ARGUMENT UNLESS
SEPARATELY ORDERED BY THE
COURT

1 I, Gregory Caffas, declare:

2 1. I am an attorney licensed to practice law in the District of Colombia
3 and the Commonwealth of Virginia, and intend to apply for admission to practice
4 before this Court *pro hac vice*. I am of counsel with Best Best & Krieger LLP,
5 counsel of record for amici curiae Rural County Representatives of California, The
6 Utility Reform Network, Communications Workers of America, and the California
7 State Association of Counties (collectively, “Amici”). Unless otherwise stated, I
8 have personal knowledge of the matters set forth herein and, if called as a witness,
9 could and would competently testify thereto.

10 2. Attached as **Exhibit A** is a true and accurate copy of excerpts from
11 CPUC Decision D.12-12-038, *Decision Adopting Basic Service Revisions*, R.09-06-
12 019 (Dec. 24, 2012). A full version of the document is available at:
13 [https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M039/K603/39603602.PD](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M039/K603/39603602.PDF)
14 [F.](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M039/K603/39603602.PDF)

15 3. Attached as **Exhibit B** is a true and accurate copy of excerpts from
16 CPUC Decision D.24-06-024, *Decision Dismissing With Prejudice the Application*
17 *of AT&T California to Withdraw as a Carrier of Last Resort*, A.23-03-003 (June
18 25, 2024). A full version of the document is available at:
19 [https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M534/K542/534542934.P](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M534/K542/534542934.PDF)
20 [DF.](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M534/K542/534542934.PDF)

21 4. Attached as **Exhibit C** is a true and accurate copy of the CPUC’s map
22 of *Incumbent Local Exchange Carriers (ILECs) in California in 2023*. The map is
23 also available at: [https://www.cpuc.ca.gov/-/media/cpuc-](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/high-cost-support-and-surcharges/chcf-a-1/ilec-territories-2023_230412.pdf)
24 [website/divisions/communications-division/documents/high-cost-support-and-](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/high-cost-support-and-surcharges/chcf-a-1/ilec-territories-2023_230412.pdf)
25 [surcharges/chcf-a-1/ilec-territories-2023_230412.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/communications-division/documents/high-cost-support-and-surcharges/chcf-a-1/ilec-territories-2023_230412.pdf).

26 5. Attached as **Exhibit D** is a true and accurate copy of excerpts from the
27 FCC’s Industry Analysis Division Office of Economics and Analytics, Report on
28

1 *Voice Telephone Services: Status as of June 30, 2025*. A full version of the
2 document is available at: [https://docs.fcc.gov/public/attachments/DOC-](https://docs.fcc.gov/public/attachments/DOC-421558A1.pdf)
3 [421558A1.pdf](https://docs.fcc.gov/public/attachments/DOC-421558A1.pdf).

4 6. Attached as **Exhibit E** is a true and accurate copy of excerpts from
5 *Opening Comments by County of San Mateo on May 10, 2024 Proposed Decision*
6 *Dismissing with Prejudice the Application of AT&T California to Withdraw as a*
7 *Carrier of Last Resort*, CPUC Dkt. A.23-03-003 (May 30, 2024). A full version of
8 the document is available at:
9 <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M532/K694/532694071.PDF>.

10 7. Attached as **Exhibit F** is a true and accurate copy of excerpts from
11 CPUC, *2025 California LifeLine Program Annual Report* (Jan. 2025 – Dec. 2025).
12 A full version of the document is available at: [https://www.cpuc.ca.gov/-](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2026/lifeline-2025-annual-report---final-version.pdf)
13 [/media/cpuc-website/divisions/office-of-governmental-affairs-](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2026/lifeline-2025-annual-report---final-version.pdf)
14 [division/reports/2026/lifeline-2025-annual-report---final-version.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2026/lifeline-2025-annual-report---final-version.pdf).

15 8. Attached as **Exhibit G** is a true and accurate copy of excerpts from
16 FCC, *Section 63.63 Application of AT&T Services, Inc., et al.* (filed June 18, 2026).
17 A full version of the document is available at:
18 <https://www.fcc.gov/ecfs/document/26109835034/1>.

19 9. Attached as **Exhibit H** is a true and accurate copy of excerpts from
20 *Comments of TURN and RCRC*, FCC WC Dkt. Nos. 26-120 & 26-121 (June 15,
21 2026). A full version of the document is available at:
22 <https://www.fcc.gov/ecfs/document/1061550269151/1>.

23 10. Attached as **Exhibit I** is a true and accurate copy of excerpts from
24 *Opening Comments of TURN and Center for Accessible Technology on the*
25 *Administrative Law Judge’s Ruling Regarding Comments on Topics Discussed at*
26 *August 22, 2025, Workshop*, CPUC Dkt. R.24-06-012 (Dec. 4, 2025). A full version
27
28

1 of the document is available at:

2 <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M590/K506/590506485.PDF>.

3 11. Attached as **Exhibit J** is a true and correct copy of excerpts from
4 *California Office of Emergency Services, State 9-1-1 Advisory Board Meeting* (May
5 14, 2025). A full version of the document is available at:

6 [https://www.caloes.ca.gov/wp-content/uploads/PSC/Documents/9-1-1-Advisory-](https://www.caloes.ca.gov/wp-content/uploads/PSC/Documents/9-1-1-Advisory-Board-Slides-May-2025.pdf)
7 [Board-Slides-May-2025.pdf](https://www.caloes.ca.gov/wp-content/uploads/PSC/Documents/9-1-1-Advisory-Board-Slides-May-2025.pdf).

8 12. Attached as **Exhibit K** is a true and correct copy of excerpts from
9 *TURN's Reply Comments in Response to the Administrative Law Judge's Ruling on*
10 *Comments to Joint Proposal of AT&T California and Cal Advocates*, CPUC Dkt.
11 No. R.24-06-012 (May 1, 2026). A full version of the document is available at:

12 <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M605/K875/605875164.PDF>.

13 13. Attached as **Exhibit L** is a true and correct copy of excerpts from
14 *Opening Comments of TURN and the Center for Accessible Technology on the*
15 *Administrative Law Judge's Ruling Regarding Comments on Topics Discussed at*
16 *April Workshops*, CPUC Dkt. R.24-06-012 (June 13, 2025). A full version of the
17 document is available at:

18 <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M569/K656/569656293.PDF>.

19 14. Attached as **Exhibit M** is a true and correct copy of excerpts from
20 CPUC Decision D.20-07-011, *Decision Adopting Wireless Provider Resiliency*
21 *Strategies*, R.18-03-011 (July 20, 2020). A full version of the document is available
22 at

23 [https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M344/K021/344021480.P](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M344/K021/344021480.PDF)
24 [DF](https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M344/K021/344021480.PDF).

25 15. Attached as **Exhibit N** are true and correct copies of FCC
26 *Communication Status Reports for Areas Impacted By California Public Safety*
27 *Power Shutoffs* for Oct. 27, 28, and 29, 2019.

28

16. Attached as **Exhibit O** is a true and correct copy of excerpts from CPUC Decision D.21-02-029, *Decision Adopting Wireline Provider Resiliency Strategies*, R.18-03-011 (Feb. 18, 2021). A full version of the document is available at:

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1-13	CPUC Decision D.12-12-038, <i>Decision Adopting Basic Service Revisions</i> , R.09-06-019 (Dec. 24, 2012)	A
14-18	CPUC Decision D.24-06-024, <i>Decision Dismissing With Prejudice the Application of AT&T California to Withdraw as a Carrier of Last Resort</i> , A.23-03-003 (June 25, 2024)	B
19-20	CPUC's map of <i>Incumbent Local Exchange Carriers (ILECs) in California in 2023</i>	C
21-24	FCC's Industry Analysis Division Office of Economics and Analytics, <i>Report on Voice Telephone Services: Status as of June 30, 2025</i>	D
25-29	<i>Opening Comments by County of San Mateo on May 10, 2024 Proposed Decision Dismissing with Prejudice the Application of AT&T California to Withdraw as a Carrier of Last Resort</i> , CPUC Dkt. A.23-03-003 (May 30, 2024)	E
30-35	CPUC, <i>2025 California LifeLine Program Annual Report (Jan. 2025 – Dec. 2025)</i>	F
36-41	FCC, <i>Section 63.63 Application of AT&T Services, Inc., et al.</i> (filed June 18, 2026)	G
42-51	<i>Comments of TURN and RCRC</i> , FCC WC Dkt. Nos. 26-120 & 26-121 (June 15, 2026)	H
52-57	<i>Opening Comments of TURN and Center for Accessible Technology on the Administrative Law Judge's Ruling Regarding Comments on Topics Discussed at August 22, 2025, Workshop</i> , CPUC Dkt. R.24-06-012 (Dec. 4, 2025)	I
58-60	<i>California Office of Emergency Services, State 9-1-1 Advisory Board Meeting</i> (May 14, 2025)	J
61-67	<i>TURN's Reply Comments in Response to the Administrative Law Judge's Ruling on Comments to Joint Proposal of AT&T California and Cal Advocates</i> , CPUC Dkt. No. R.24-06-012 (May 1, 2026)	K
68-72	<i>Opening Comments of TURN and the Center for Accessible Technology on the Administrative Law Judge's Ruling Regarding Comments on Topics Discussed at April Workshops</i> , CPUC Dkt. R.24-06-012 (June 13, 2025)	L
73-82	CPUC Decision D.20-07-011, <i>Decision Adopting Wireless Provider Resiliency Strategies</i> , R.18-03-011 (July 20, 2020)	M

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83-98	<i>FCC Communication Status Reports for Areas Impacted By California Public Safety Power Shutoffs</i> for Oct. 27, 28, and 29, 2019	N
99-105	CPUC Decision D.21-02-029, <i>Decision Adopting Wireline Provider Resiliency Strategies</i> , R.18-03-011 (Feb. 18, 2021)	O
106-110	CPUC, <i>Site Visits Report, Emergency Disaster Relief Program Years 2021, 2022, and 2023</i> (Oct. 31, 2024)	P
111-114	CPUC, Resolution T-17789 (June 20, 2024)	Q

EXHIBIT A

COM/MP1/gd2/lil

Date of Issuance 12/24/2012

Decision 12-12-038 December 20, 2012

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding
Revisions to the California High Cost
Fund B Program.

Rulemaking 09-06-019
(Filed June 18, 2009)

DECISION ADOPTING BASIC TELEPHONE SERVICE REVISIONS

R.09-06-019 COM/MP1/gd2/lil

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identifying basic service needs is the 95% share of residential market penetration that represents the Commission's universal service goal. By contrast, less than 50% of California consumers have chosen to discontinue wireline service. While a growing number of consumers may be willing to give up some basic service elements in favor of current wireless offerings, this minority does not determine the preferences or needs of customers that continue to rely upon basic service.

The principles of universal service extend to all segments of the public, not just the technologically sophisticated whose calling needs may be met by wireless or other alternative technologies. In particular, many among the elderly, disabled, economically disadvantaged, or non-English-speaking sectors may exhibit different needs compared to younger, technologically sophisticated, or more affluent sectors. As expressed by speakers at the PPHs held during March 2011, more vulnerable sectors of the public are not prepared or equipped to forfeit current protections offered through wireline basic service. Also, consumers in urban settings with multiple telecommunications choices face different constraints compared with those residing in rural or remote regions with fewer or only one choice of provider for basic service.

For many, the choice is not an either-or alternative between wireline versus wireless. Most Californian consumers today own both a wireline and a wireless phone. Wireline and wireless services may be complementary rather than complete substitutes for each other.

As noted in the Federal Communications Commission's (FCC) report on wireless markets for the first half of 2009, 22.7% of households were wireless only, up from 17.5% a year earlier, and 13.6% a year before that. Also, as noted in the CPUC Staff Report on Affordability of Telephone Service, on a statewide basis, of the households subscribing to landline, 24% of the households are

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8. Rulemaking 09-06-019 remains open for remaining issues relating to California High Cost Fund-B reform.

This order is effective today.

Dated December 20, 2012, at San Francisco, California.

MICHAEL R. PEEVEY

President

TIMOTHY ALAN SIMON

MICHEL PETER FLORIO

CATHERINE J.K. SANDOVAL

MARK J. FERRON

Commissioners

APPENDIX A

Basic Telecommunications Service Elements

At a minimum, the following service elements must be offered on a nondiscriminatory basis by any carrier providing Residential Basic Telephone Service (basic service) within California. These revised basic service elements do not impose an obligation to provide basic service upon any carrier where no such obligation exists today. Nor do they prohibit a carrier from electing to provide additional elements as part of its basic service offering. Any carrier may use any technology to satisfy any obligation to provide basic service as detailed below:

I. Basic Service Elements:

1. The provider must offer customers the ability to place and receive voice-grade calls over all distances utilizing the public switched telephone network or successor network.
 - a. Carriers offering basic service must at a minimum enable calls to be sent and received within a local exchange or over an equivalent or larger-sized local calling area.
 - b. A basic service provider must allow equal access to all interexchange carriers within the local calling area in accordance with state and federal law and regulation.
 - c. Carriers offering basic service must provide a voice-grade connection from the customer residence to the public switched telephone network or successor network.
 - d. Carriers offering basic service must disclose to each customer before subscription that they are entitled to a voice-grade connection and the conditions under which the customer may terminate service without penalty if one cannot be provided.
 - e. If at any time, a basic service customer fails to receive a voice-grade connection to the residence and notifies the provider, the basic service provider is required to (1) promptly restore the voice-grade connection, or if not

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possible (2) provide basic service to that customer using a different technology if offered by the provider and if the customer agrees; or (3) allow the customer to discontinue service without incurring early termination fees, if applicable. Nothing in these rules should be inferred as modifying the service obligation of a COLR to ensure continuity of customers' basic service.

2. Free access to 911/Enhanced (E) 911 service.
 - (a) A basic service provider must provide free access to 911/E911 emergency services, in compliance with current state and federal laws and regulations.
 - (b) Any carrier that is not a traditional wireline provider of basic service will be required to make a showing by filing a Tier 3 Advice Letter that demonstrates its ability to provide 911/E911 location accuracy and reliability that is at a minimum at least reasonably comparable, but not necessarily identical to, that traditional wireline service offered by the existing COLR.
 - (c) The basic service provider will further be required to certify in a Tier 3 Advice Letter filing that it is compliant with 911/E911 standards established by state and federal laws and regulations, and will not be deemed to provide basic service if it has obtained a waiver from such state and federal laws and regulations.
 - (d) Each basic service provider must provide its potential and existing customers information regarding its 911/E911 emergency services location accuracy and reliability standards.

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3. Access to directory services.

- (a) Each basic service provider must offer access to directory assistance within the customer's local community that covers an area at least equivalent to the size of the geographic area the existing COLR's directory assistance service provides.
- (b) For basic service provided by other than a traditional wireline carrier, a customer's listing may be excluded from the local directory and directory assistance as a default unless the subscriber affirmatively requests to have the number listed.
- (c) For basic service provided by a traditional wireline carrier, a customer's listing shall be included for free in the local directory and directory assistance as a default unless the customer affirmatively requests to have the number unlisted.
- (d) A basic service provider must provide customers the option to receive a free white pages directory covering the local community in which the customer resides. For purposes of this definition, the local community shall include a geographic region at least equivalent to the area covered by the white pages directory that the existing COLR currently provides.
- (e) Because Verizon California, Inc. (Verizon) and other providers of basic service to customers residing in Verizon's service territory have been authorized to provide electronic delivery pursuant to Resolution T-17302, that authorization is compliant with the white pages directory requirement for basic service in Verizon's territory.

R.09-06-019 COM/MP1/gd2/lil

- (f) The requirement to provide a free published directory can be satisfied using the procedures authorized in Resolution T-17302 in other territories upon the filing of a Tier 2 Advice Letter. Under this authorization, the affected customers will receive delivery of the directory electronically by CD-ROM or by on-line access, unless a customer affirmatively elects to receive a traditional printed paper copy by contacting the basic service provider under the procedures authorized in Resolution T-17302.

4. Billing Provisions

- (a) Providers of basic service must offer customers the option to receive unlimited incoming calls without incurring a per-minute or per-call charge.
- (b) Carriers offering basic service must offer a flat rate option for unlimited outgoing calls that at a minimum mirrors the local exchange or an equivalent or larger sized local calling area in which the basic service customer resides.
- (c) Basic service must be offered on a non-discriminatory basis to all residential households within the provider's service territory. A carrier may satisfy this obligation using different technologies throughout its service territory.
- (d) Basic service providers must offer Lifeline rates on a non-discriminatory basis to any customers meeting Lifeline eligibility requirements residing within the service territory where the provider offers basic service.
- (e) Carriers providing basic service must offer an option with monthly rates and without contract or early termination penalties.
- (f) Carriers may offer added features and/or enhanced service elements without additional charge(s) as part of a basic service offering. For example, carriers must not obligate customers to also subscribe to service bundles that require subscription to data and/or video services as a condition of receiving basic service.
- (g) As of January 1, 2011, the Commission no longer imposes caps on basic rates. A COLR serving in a high-cost area,

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however, will continue to be required to certify that its basic rate in a designated high-cost area does not exceed 150% of the highest basic rate charged by a COLR in California outside of the high-cost area.

5. Access to 800 and 8YY Toll-Free Services.

- (a.) Each provider of basic service must offer at least one basic service option that allows unlimited calls to 800 and 8YY toll-free numbers with no additional usage charges for such calls. A provider may offer alternative billing plans for basic service that may include usage charges for calls to 800 and 8YY toll-free numbers.
- (b) In any event, the carrier must provide full disclosure to the customer concerning how charges for 800 numbers would apply if the customer does not subscribe to an unlimited calling flat rate option.

6. Access to Telephone Relay Service as Provided for in Pub. Util. Code § 2881.

Basic service providers must offer free access to California Relay Service pursuant to § 2881 for deaf or hearing-impaired persons or individuals with speech disabilities.

7. Free Access to Customer Service for Information about Universal Lifeline Telephone Service (ULTS) Service Activation, Service Termination, Service Repair and Bill Inquiries.

The basic service provider shall provide free access to customer service for information about the above-referenced services.

8. One-Time Free Blocking for Information Services, and One-Time Billing Adjustments for Charges Incurred Inadvertently, Mistakenly, or Without Authorization.

Basic service must include the provision of one-time free blocking for 900/976 information services and one-time free billing adjustments for changes inadvertently or mistakenly incurred, or without authorization.

9. Access to operator services

Basic service shall include free access to operator services.

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II. General Requirements

In addition to the basic service elements and related requirements listed above, basic service shall be provided consistent with the following requirements.

- a) A basic service provider must file and maintain tariffs or schedules with the Commission by a Tier 2 Advice Letter for its basic service offerings which must include its basic service rates, charges, terms, and conditions; and must make them publicly available. Requirements for customer notice and/or Commission filings for revisions in basic service rates, charges, terms, and/or conditions must be made in accordance with the applicable requirements for tariff filings set forth in General Order 96-B.
- b) If a carrier chooses to offer basic service in all or part of its service territory using multiple, different technologies, each type of offering must be tariffed or scheduled with the Commission. This requirement does not extend beyond basic service.
- c) Each basic service provider must clearly inform all potential residential subscribers who contact the provider prior to initiating service of their option to purchase basic service and to subscribe to basic service on a month-to-month basis with no termed contracts.
- d) A provider must not represent to customers, or in advertising or by any other means, that any services, service elements, or service conditions, except those authorized by the Commission, constitute basic service in California.
- e) Until the Commission determines the extent to which new service quality standards should be adopted for carriers, a provider that wishes to offer basic service utilizing anything other than traditional exchange-based wireline technology that cannot comply with all the requirements of General Order 133-C must file a Tier 3 advice letter.

R.09-06-019 COM/MP1/gd2/lil

- f) This filing must indicate what General Order 133-C service quality measurements and reporting procedures it can comply with, those it can provide functionally equivalent reporting information for and lastly what measurement and reporting requirements are not applicable to the technology it is using to provide basic service. This filing must further indicate how the new service or new technology maintains essential basic services or standards.

(END OF APPENDIX A)

EXHIBIT B

ALJ/TJG/hma

Date of Issuance: 6/25/2024

Decision 24-06-024 June 20, 2024

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Bell Telephone
Company d/b/a/ AT&T California
(U1001C) for Targeted Relief from its
Carrier of Last Resort Obligation and
Certain Associated Tariff Obligations.

Application 23-03-003

**DECISION DISMISSING WITH PREJUDICE THE APPLICATION OF AT&T
CALIFORNIA TO WITHDRAW AS A CARRIER OF LAST RESORT**

A.23-03-003 ALJ/TJG/hma

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A.23-03-003 ALJ/TJG/hma

DECISION DISMISSING WITH PREJUDICE THE APPLICATION OF AT&T CALIFORNIA TO WITHDRAW AS A CARRIER OF LAST RESORT

Summary

This decision grants the Motion to Dismiss, filed by the California Public Utilities Commission's (Commission) Public Advocates Office on June 30, 2023. Granting this motion dismisses with prejudice the Application of Pacific Bell Telephone Company d/b/a/ AT&T California (AT&T) "for Targeted Relief from its Carrier of Last Resort (COLR) Obligation" filed and served on March 3, 2023 and amended on May 17, 2023.

The Commission's COLR withdrawal rules, adopted in Decision (D.) 96-10-066 and affirmed in D.12-12-038, require either the presence of an existing COLR in the service territory a current COLR wishes to withdraw from, or for a new COLR to volunteer to replace the COLR seeking permission to withdrawal. No other COLR serves AT&T's service territory. No potential COLR applied to replace AT&T.

Given that AT&T's Application, as amended, does not meet the requirements of the Commission's COLR withdrawal rules, and the existing undisputed facts of this case make that clear, AT&T's Application is dismissed with prejudice.

This proceeding is closed.

Finally, the Commission intends to initiate an Order Instituting Rulemaking to consider whether to revise its COLR rules.

A.23-03-003 ALJ/TJG/hma

O R D E R

IT IS ORDERED that:

1. The Application of Pacific Bell Telephone Company d/b/a/ AT&T California (U1001C) for Targeted Relief from its Carrier of Last Resort Obligation and Certain Associated Tariff Obligations is dismissed, with prejudice.

2. Pacific Bell Telephone Company d/b/a/ AT&T California (U1001C) shall not file another application for relief from its Carrier of Last Resort obligations until at least one year after the issuance of a decision closing the new Order Instituting Rulemaking discussed in Section 14.

3. Pacific Bell Telephone Company d/b/a/ AT&T California (U1001C) shall not file a similar application to the dismissed application until at least until one year after the issuance of a decision closing the new Order Instituting Rulemaking discussed in Section 14.

4. Application 23-03-003 is closed.

This order is effective upon issuance.

Dated June 20, 2024, at San Luis Obispo, California.

ALICE REYNOLDS

President

DARCIE L. HOUCK

JOHN REYNOLDS

KAREN DOUGLAS

Commissioners

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

EXHIBIT C

Incumbent Local Exchange Carriers (ILECs) in California 2023

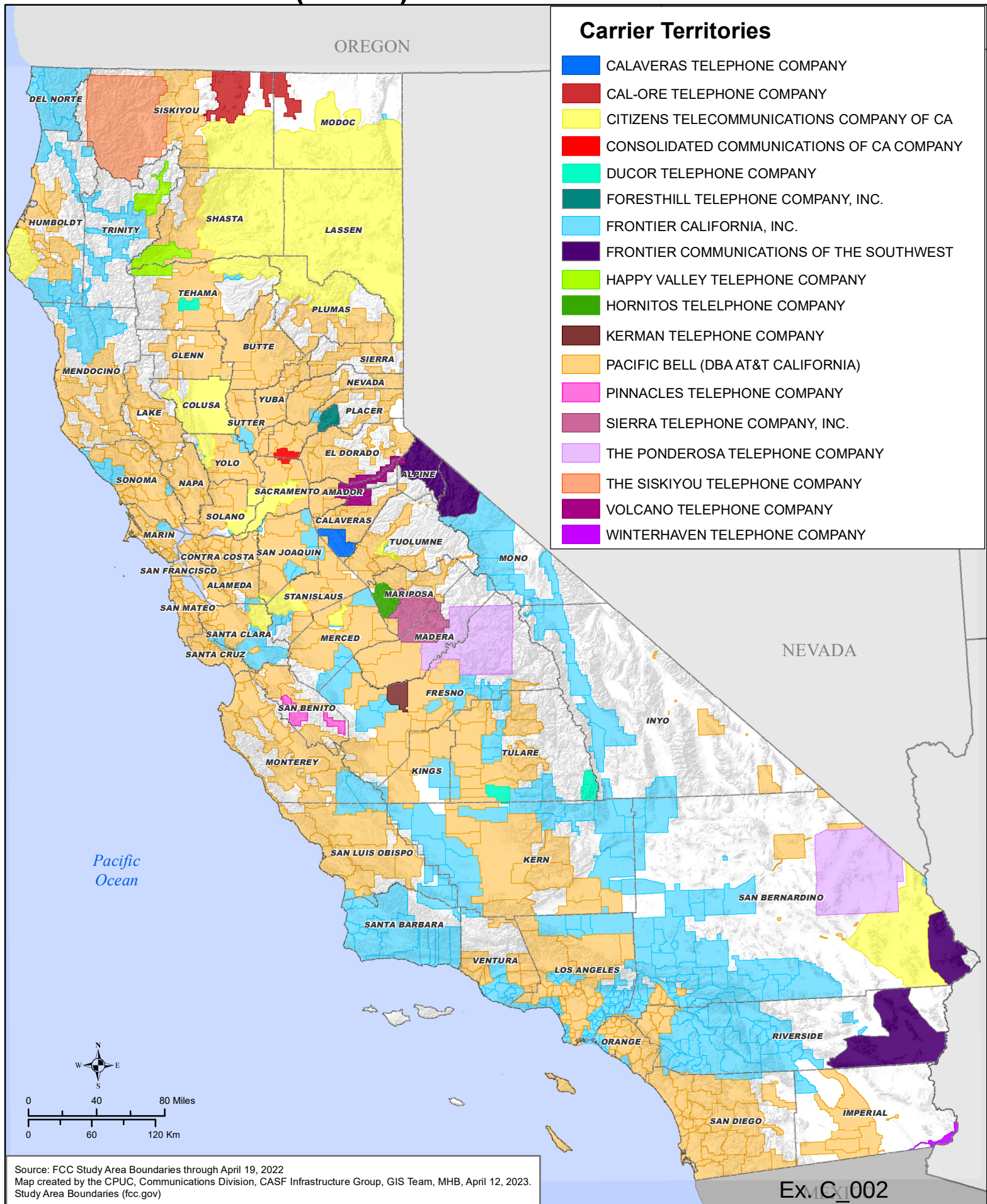


EXHIBIT D

Voice Telephone Services: Status as of June 30, 2025

Industry Analysis Division
Office of Economics and Analytics
May 2026



Inquiries regarding the information in this report may be addressed to OEA-IADreports@fcc.gov.

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**Table 3: Residential Wireline Voice Telephone Service Connections and Households by State
as of June 30, 2025**
(Connections and households, in thousands)

State	Households	Switched Access		Interconnected VoIP		Total	
		Connections	Ratio	Connections	Ratio	Connections	Ratio
Alabama	1,997	83	0.04	227	0.11	310	0.16
Alaska	271	*	*	*	*	47	0.17
American Samoa	10	7	0.72	-	*	7	0.72
Arizona	2,856	103	0.04	259	0.09	362	0.13
Arkansas	1,206	62	0.05	78	0.06	139	0.12
California	13,548	489	0.04	2,199	0.16	2,689	0.20
Colorado	2,374	141	0.06	281	0.12	421	0.18
Connecticut	1,434	55	0.04	394	0.27	448	0.31
Delaware	402	12	0.03	118	0.29	130	0.32
District of Columbia	324	9	0.03	48	0.15	57	0.18
Florida	8,753	177	0.02	1,208	0.14	1,385	0.16
Georgia	4,074	223	0.05	449	0.11	672	0.16
Guam	42	*	*	*	*	12	0.29
Hawaii	492	50	0.10	83	0.17	133	0.27
Idaho	713	55	0.08	28	0.04	82	0.12
Illinois	5,036	171	0.03	589	0.12	761	0.15
Indiana	2,716	115	0.04	261	0.10	375	0.14
Iowa	1,316	148	0.11	80	0.06	228	0.17
Kansas	1,174	52	0.04	98	0.08	150	0.13
Kentucky	1,814	173	0.10	182	0.10	355	0.20
Louisiana	1,805	53	0.03	179	0.10	232	0.13
Maine	597	59	0.10	108	0.18	167	0.28
Maryland	2,363	93	0.04	564	0.24	657	0.28
Massachusetts	2,785	98	0.04	792	0.28	891	0.32
Michigan	4,076	140	0.03	575	0.14	715	0.18
Minnesota	2,308	231	0.10	222	0.10	453	0.20
Mississippi	1,145	38	0.03	91	0.08	128	0.11
Missouri	2,508	106	0.04	264	0.11	370	0.15
Montana	459	51	0.11	56	0.12	107	0.23
Nebraska	798	79	0.10	60	0.08	139	0.17
Nevada	1,203	40	0.03	137	0.11	177	0.15
New Hampshire	556	40	0.07	134	0.24	174	0.31
New Jersey	3,508	97	0.03	1,082	0.31	1,179	0.34
New Mexico	837	82	0.10	80	0.10	162	0.19
New York	7,723	288	0.04	2,199	0.28	2,488	0.32
North Carolina	4,282	220	0.05	620	0.14	839	0.20
North Dakota	331	40	0.12	23	0.07	63	0.19
Northern Mariana Islands	16	5	0.31	*	*	*	*
Ohio	4,863	276	0.06	670	0.14	946	0.19
Oklahoma	1,562	67	0.04	103	0.07	170	0.11
Oregon	1,718	103	0.06	223	0.13	326	0.19
Pennsylvania	5,275	342	0.06	1,134	0.21	1,476	0.28
Puerto Rico	1,291	*	*	*	*	*	*
Rhode Island	442	15	0.03	93	0.21	108	0.24
South Carolina	2,118	136	0.06	248	0.12	384	0.18
South Dakota	366	48	0.13	24	0.07	72	0.20
Tennessee	2,824	156	0.06	277	0.10	433	0.15
Texas	10,993	295	0.03	950	0.09	1,245	0.11
Utah	1,125	48	0.04	89	0.08	137	0.12
Vermont	273	52	0.19	50	0.18	102	0.37
Virgin Islands	30	*	*	*	*	7	0.24
Virginia	3,366	172	0.05	603	0.18	776	0.23
Washington	3,065	171	0.06	407	0.13	578	0.19
West Virginia	729	87	0.12	137	0.19	224	0.31
Wisconsin	2,479	190	0.08	337	0.14	527	0.21
Wyoming	243	24	0.10	21	0.09	45	0.18
United States	130,616	6,413	0.05	19,405	0.15	25,819	0.20

- = Rounds to Zero; * = Data withheld to maintain firm confidentiality.

Notes: Numbers may not sum to totals due to rounding. Total fixed voice connections equal the sum of switched access lines and interconnected VoIP subscriptions.

Source: FCC Form 477; 2020-2024 ACS 5-year estimates; and Census 2010.

EXHIBIT E

**FILED**

05/30/24

04:59 PM

A2303003

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

Application of Pacific Bell Telephone Company
d/b/a/ AT&T California (U1001C) for Targeted
Relief from its Carrier of Last Resort Obligation
and Certain Associated Tariff Obligations.

Application 23-03-003

(Filed March 3, 2023)

**OPENING COMMENTS BY COUNTY OF SAN MATEO ON MAY 10, 2024 PROPOSED
DECISION DISMISSING WITH PREJUDICE THE APPLICATION OF AT&T
CALIFORNIA TO WITHDRAW AS A CARRIER OF LAST RESORT**

JOHN D. NIBBELIN
COUNTY COUNSEL (SBN 184603)
CAITI T. BUSCH
DEPUTY COUNTY COUNSEL (SBN 318534)

Attorneys for
COUNTY OF SAN MATEO
500 County Center, 4th Floor
Redwood City, CA 94063
Telephone: (650) 363-4768
E-mail: jnibbelin@smcgov.org
E-mail: cbusch@smcgov.org

Dated: May 30, 2024

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(Recommended Changes to the Proposed Decision)

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often less reliable than POTS, including because the alternatives often rely on the local power grid or short-term, generator-based back-up power, whereas copper landlines are often powered at a more distant origination source, allowing landlines to remain operable during power outages, including, importantly, during natural hazards when communication with emergency responders is of paramount importance.

These potential impacts would be grave in San Mateo County, where many vulnerable residents living in rural and semi-rural areas must rely on the copper-based landline service provided by AT&T because it is their only reliable access to telephonic communications. Some areas in rural and semi-rural San Mateo County do not have any broadband internet or cellular service, and they may never be able to fully access wireless services. Even for areas that might have alternative technologies available, those alternatives are not sufficiently reliable due to a variety of factors, including power outages during natural hazard events. The power grid in rural and semirural San Mateo County is unreliable during such events, with outages sometimes lasting for several days at times. During these events, many San Mateo County residents rely exclusively on AT&T's POTS to communicate with emergency service providers and loved ones. If AT&T were allowed to terminate POTS services throughout San Mateo County, thousands of residents residing in areas with unreliable alternative coverage could be put at risk.

For these reasons, the Proposed Decision is correct and in the best interests of California's residents. At the same time, however, the Proposed Decision goes further than is required to deny AT&T's application by commenting in Section 11 of the Proposed Decision (at 21–23) on AT&T's ability to modernize its network in light of its COLR obligations. For the reasons discussed below, San Mateo County respectfully requests the Commission omit Section 11 from its Final Decision.

AT&T must still comply with the basic service requirements. Nor does the Proposed Decision acknowledge in Section 11 what it expressly notes elsewhere: that certain alternative technologies AT&T might elect to pursue may *not* be able to meet basic service requirements throughout the State. (See *id.* at 18 [“[T]hese companies [providing alternative voice services] may not even be able to meet [the basic service] requirement.”]; *id.* at 18–19 & fn. 48–49 [explaining potential network and coverage issues presented by alternative technologies].) As discussed above, most alternatives to copper landlines are less reliable than POTS, especially during power outages when stable communication channels are needed most.

Because Section 11 of the Proposed Decision is irrelevant to the ultimate disposition and could be misread as allowing AT&T to skirt its COLR requirements by choosing to offer alternatives to POTS that do not meet the basic service requirements, the County of San Mateo respectfully requests that the Commission omit Section 11 from its Final Decision.

III. CONCLUSION

Based on the foregoing, the County of San Mateo requests that the Commission adopt the Proposed Decision in its entirety, with the exception of Section 11, which is irrelevant and potentially misleading.

Dated: May 30, 2024

Respectfully submitted,

JOHN D. NIBBELIN, COUNTY COUNSEL

By: /s/ Caiti T. Busch

Caiti T. Busch

Deputy County Counsel (SBN 318534)

Hall of Justice and Records

400 County Center, 6th Floor

Redwood City, CA 94063

Telephone: (650) 363-4768

E-mail: cbusch@smcgov.org

EXHIBIT F



2025 Annual Report

California LifeLine Program

Program Year January 2025 – December 2025



**California Public
Utilities Commission**

Ex. F_002

Mission

Providing affordable, accessible and reliable communications services to low-income households in California.

The California Public Utilities Commission's (Commission) California LifeLine Program (The California LifeLine) is committed to ensuring that all qualifying low-income residents have access to essential communications services. By providing discounts on basic landline and wireless phone services, the Program helps individuals stay connected to critical resources including employment, healthcare and education.

Vision

California LifeLine meets the evolving communications needs of Californians by giving discounts on plans and services available in the marketplace and streamlining access for all eligible populations.

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CALIFORNIA LIFELINE PROGRAM
2025 ANNUAL REPORT

Program Overview

The California Legislature enacted the Moore Universal Telephone Service Act (Moore Act) in 1983 to make high-quality basic telephone service accessible and affordable to the greatest number of Californians.² The Commission established the California LifeLine Program to implement the Moore Act. The program provides discounts on home phone (wireline) and cell phone (wireless) services to qualified households. Through California LifeLine, the Commission provides a subsidy, or SSA to qualified low-income participants and foster youth for wireline, fixed Voice over Internet Protocol, or mobile voice and broadband services.³ The Universal LifeLine Telephone Service Trust Administrative Fund funds this subsidy through a surcharge collected on all access lines in California.⁴

Although the Moore Act was originally enacted to offer high quality basic telephone service at affordable rates to the greatest number of California residents, the Commission and the California Legislature have since expanded California LifeLine to include additional communications services. In 2014, the Commission modernized the program rules to incorporate wireless services into the LifeLine program and to update the wireline LifeLine rules. To further enhance the program's reach and to increase participation in the California LifeLine Program to underserved and unserved low-income households, the Commission developed strategies for pilot programs and government partnerships in 2018. This commitment to innovation transitioned to the 2019 iFoster pilot program which evolved into the official launch of the Foster Youth Long-Term Program and Pilot Program in 2024. By 2020, the program refined its impact by setting SSA and MSS to ensure benefits remained aligned with state policy goals and participant needs. These modifications refined the specific eligibility criteria and operational guidelines for the Foster Youth Program within the broader California LifeLine framework. Building upon this foundation of adaptive growth, the Commission took several landmark steps in 2025.

- i. The Commission in D.25-08-050 authorized a three-year, technology-neutral Home Broadband Pilot. This program addresses the urgent need for affordable high-speed internet among low-income Californians.
- ii. In November 26, 2025, the Commission opened a new Rulemaking, R.25-11-005, to update the California LifeLine Program. This proceeding will assess enhancements to the California LifeLine Program including, but not limited to, the development of a new methodology for determining the amount of subsidy provided by the program, enabling independent enrollment, considering strategies to leverage partnerships with social service agencies and community-based organizations,

² Pub. Util. Code §§ 871 et seq.

³ See generally D.24-12-006 (freezing SSA temporarily at \$19.00)

⁴ D.22-10-021 at 52 (defining "Access Line" as "wire or wireless connection that provides a real time two way voice telecommunications service or [Voice Over Internet Protocol] service to or from any device utilized by an end user, regardless of technology, which is associated with a 10- digit NPA-NXX number or other unique identifier and a service address or Place of Primary Use in California.")

EXHIBIT G

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of	)	
	)	
Section 63.63 Application of	)	
	)	
In the matter of Section 63.63 Application of	)	
AT&T Services, Inc., on behalf of its affiliates	)	File No.
BellSouth Telecommunications, LLC, d/b/a	)	
AT&T Alabama, AT&T Florida, AT&T Georgia,	)	
AT&T Kentucky, AT&T Louisiana, AT&T	)	
Mississippi, AT&T North Carolina, AT&T South	)	
Carolina, and AT&T Tennessee; Indiana Bell	)	
Telephone Company, LLC, d/b/a AT&T Indiana;	)	
Southwestern Bell Telephone Company, LLC,	)	
d/b/a AT&T Arkansas, AT&T Kansas, AT&T	)	
Missouri, AT&T Oklahoma, and AT&T Texas;		
Wisconsin Bell, LLC, d/b/a AT&T Wisconsin.		

For Authority Pursuant to Section 214 of
The Communications Act of 1934, As Amended,
To Discontinue the Provision of Service

SECTION 63.63 APPLICATION OF AT&T

In this application, AT&T Services, Inc., on behalf of its above captioned affiliates,¹ seeks emergency authorization under Section 214(a) of the Communications Act, as amended ("the Act"), 47 U.S.C. § 214, and Section 63.63 of the Federal Communications Commission's ("Commission") rules, to suspend AT&T's voice services in various locations impacted by damage to AT&T's legacy copper network. For administrative ease, this application includes multiple incidents occurring at different times and locations.

¹ The FRN associated with this application is 0001857952.

A. As required by Section 63.63(a) of the Commission's rules, AT&T provides the following information:

(1) The effective date of such discontinuance, reduction, or impairment, and the identification of the service area affected;

This application encompasses multiple separate unexpected outages, each of which occurred at different times and in different locations. Exhibit 1 includes a map of where each incident occurred, as well as the date when each one began.

(2) The nature and estimated duration of the conditions causing the discontinuance, reduction, or impairment;

Exhibit 1 contains a description of the cause of each unexpected outage. As discussed below, AT&T does not intend to restore service to the impacted areas, because comparable substitute service is available to all impacted customers.

(3) The facts showing that such conditions could not reasonably have been foreseen by the carrier in sufficient time to prevent such discontinuance, reduction, or impairment;

In each instance, whether the outage was caused by copper theft, equipment failure, or some other unexpected impairment of AT&T's facilities, the discontinuance of service was beyond AT&T's control. Specific descriptions for the outages addressed by this application are included in Exhibit 1.

(4) A description of the services involved;

For each outage, Exhibit 1 lists the services involved, as well as the number of affected circuits. Here are brief descriptions of each service referenced in Exhibit 1:

- "AT&T Residential Local Service" is AT&T's residential, TDM-based voice service, often referred to as POTS.

- "AT&T Business Local Exchange Access Line Service" is AT&T's business POTS product.
- "AT&T Phone Service" is AT&T's residential wireline VoIP service.
- "AT&T Phone for Business" is AT&T's business wireline VoIP service.

(5) The nature of service which will be available or substituted;

As a replacement for these customers' voice services, AT&T offers AT&T Phone – Advanced and AT&T Phone for Business – Advanced (collectively, "AP-A"),² both IP-based, over-the-top voice products that the FCC has previously found to be adequate replacements for the voice services experiencing outages.³ These customers also have many other options available to them for voice service, including mobile service from the major wireless carriers.

Because cost-effective substitute services are available to these customers, and because of the time and cost involved in repairing the damaged facilities, AT&T does not intend to restore service to these customers.

It does not make economic sense or serve the public interest for AT&T to spend its time and money to restore a portion of its legacy network serving relatively few customers in these areas, particularly when AT&T plans to retire the vast majority of its legacy copper network,

² AT&T recently introduced an updated and renamed version of AT&T Phone for Business – Advanced called AT&T Business Voice ("ABV"). ABV launched on June 17, 2025, and is in the process of being introduced to different market segments. Currently, depending on the market segment, the service may be sold to customers as ABV or AT&T Phone for Business – Advanced. For simplicity's sake, in this application references to "AP-A" include ABV as well as AT&T Phone – Advanced and AT&T Phone for Business – Advanced.

³ See Section 63.71 Application of AT&T, WC Dkt No. 24-220 (filed Nov. 1, 2024); *id.*, WC Dkt No. 25-25 (filed Apr. 1, 2025); *id.*, WC Dkt No. 25-228 (filed July 15, 2025); *id.*, WC Dkt No. 25-230 (filed July 15, 2025); *id.* WC Dkt No. 25-335 (filed Dec. 1, 2025).

including the facilities in these areas, within the next few years.⁴ The public interest is better served by allowing AT&T to redeploy its limited resources toward the next-generation networks necessary to compete in today's communications marketplace, especially when replacement services are available.⁵

Prior to filing this application, AT&T sent the customers impacted by these outages a letter notifying them of AT&T's intent not to restore service and advising them of the availability of cost-effective substitute services.

(6) The effect upon rates to any person in the community;

AT&T is unaware of any effect these suspensions may have upon rates to any person in the community.

(7) The efforts made and to be made by applicant to restore the original service or establish comparable service as expeditiously as possible.

As discussed above, because comparable replacement service is available to the impacted customers, AT&T does not intend to restore the original services.

Conclusion:

AT&T respectfully requests that the Commission grant AT&T's Section 63.63 Application to suspend service to customers.

⁴ See Press Release, AT&T, *AT&T Outlines Strategic Plan to Drive Sustainable Growth and Enhanced Shareholder Returns* (Dec. 3, 2024), <https://about.att.com/story/2024/analyst-and-investor-day-2024.html> (“[AT&T] is actively working to exit its legacy copper network operations across the large majority of its legacy wireline footprint by the end of 2029.”).

⁵ See, e.g., *Reducing Barriers to Network Improvements and Service Changes; Accelerating Network Modernization*, Statement of Chairman Brendan Carr, WC Dkt No. 25-209 (rel. July 25, 2025) (“We are looking to unleash the private sector to build the modern networks of the future and ensure that providers are no longer forced to invest billions of dollars in aging technology.”); FCC, *Connecting America: The National Broadband Plan* at 59 (Mar. 16, 2010) (“require[ing] certain carriers to maintain POTS...is not sustainable—and...can have a number of unintended consequences, including siphoning investments away from new networks and services.”).

By: /s/ Brett Farley

Brett Farley

AT&T Services, Inc.
601 New Jersey Ave., N.W.
Washington, D.C. 20001
(202) 457-2253

June 18, 2026

EXHIBIT H

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

AT&T Services, Inc.'s Section 214
Applications to Discontinue Domestic
Legacy Voice Service as Part of a
Technology Transition

)
)
)
)
)
)

WC Docket Nos. 26-120 & 26-121

Comp. Pol. File Nos. 2137 & 2138

**COMMENTS OF THE UTILITY REFORM NETWORK AND RURAL COUNTY
REPRESENTATIVES OF CALIFORNIA**

Ryan Johnston
Telecommunications Regulatory Attorney
The Utility Reform Network
360 Grand Avenue, #150
Oakland, CA 94610
rjohnston@turn.org

Tracy Rhine
Leigh Kammerich
Senior Policy Advocates
Rural County Representatives of California
1215 K Street, Suite 1650
Sacramento, CA 95814
trhine@rcrcnet.org
lkammerich@rcrcnet.org

June 15, 2026

Ex. H_002

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NBM has certainly increased the transparency of service reporting in the U.S., the maps continue to reflect inaccurate, provider reported data that does not reflect consumers' actual experiences.¹⁴ Further, the Commission's own procedures show that the NBM is not an accurate representation of service. The Code of Federal Regulations (CFR) outlines the details of the Commission's data verification process, which includes the authority to audit the accuracy of providers' maps and procedures for consumer challenges to the accuracy of the maps.¹⁵ If the Commission truly believed that its maps developed through provider-reported data were error-free, its complex rules for challenges and audits would be unnecessary. Similarly, the Commission retains the authority to conduct audits when "there may be patterns of filing incorrect, information, as determined by the Office of Economics and Analytics."¹⁶ If the Commission did not anticipate the possibility of inaccurate maps, it would not have felt the need to include authority to conduct audits in its rules. Particularly relevant here, the Commission provides avenues for consumers to challenge the accuracy of the maps using "data based on lack of service or on poor service quality such as slow delivered user speed."¹⁷ With perfectly accurate maps, a consumer challenge process would be unnecessary. Finally, the CFR states that propagation maps submitted by providers must depict *outdoor* coverage, to include both on-street or pedestrian stationary usage, and in-vehicle mobile usage.¹⁸ This requirement shows that the NBM cannot speak to the availability of *any wireless service indoors*. While AT&T claims that the maps show definitive coverage, the quality of that coverage is called into question as soon as a consumer steps from

Utility Reform Network, at 33-35 (filed Sept. 27, 2024),
<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M541/K493/541493792.PDF>.

¹⁴ *Id.* at 33.

¹⁵ *See* 47 C.F.R. § 1.7006 (2026).

¹⁶ *Id.* at § 1.7006(a).

¹⁷ *Id.* at § 1.7006(c).

¹⁸ 47 C.F.R. 1.7004(c)(5) (emphasis added).

the street into their home. As a result, the Commission should find that AT&T has not met the service availability metric of the second prong of the ART.

In addition, when a provider is relying on a single replacement service, whether its own or that of a third party, it must demonstrate that the replacement service reaches the entire geographic footprint of the area served by the legacy voice service.¹⁹ The only showing that AT&T has supplied to support its point that AP-A and APB-A are available throughout its service area are its claims that it does.²⁰ This showing neither satisfies the letter nor the spirit of the Commission's rules.

Access to critical applications and emergency services is also required to satisfy the second prong of the adequate replacement test.²¹ However, there are significant concerns that mobile networks cannot provide the same resistance to outages maintained by legacy networks. For example, in June 2024, over 70,000 AT&T customers reported outages with their wireless service after “a software bug” disrupted AT&T's network.²² This outage lasted the better part of a day and left tens of thousands of consumers without access to basic calling features, including access to emergency services and 911.²³ This outage occurred nationwide, with significant impacts in California. On another occasion, a fire destroyed an AT&T hub in Gardena, California, which led to disrupted voice service and an inability to reach emergency services.²⁴

¹⁹ Tech Transitions Order at para. 124.

²⁰ AT&T 63.71 Application at 3, 6.

²¹ Tech Transitions Order at para. 126-135.

²² Aimee Picchi and Taylor Johnston, Map shows where AT&T outages hit cellphone users across the U.S., CBS News (updated June 24, 2024), <https://www.yahoo.com/news/map-shows-where-t-outages-174050613.html>.

²³ *Id.*

²⁴ International Association of Fire and Rescue Services, Afire in a Telephone Facility Knocked Out 911 Call Centre – Battery Bank Complicated Firefighting Efforts, CTIF (Aug. 12, 2025),

Just this year a weeks-long AT&T service outage left residents of Shelter Valley unable to reach friends, family, or emergency services.²⁵ These examples, in addition to the testimonials found below, show that AT&T has a track record failing to prioritize the reliability and continuity of access to emergency services inside and outside California. If the Commission grants AT&T's requested discontinuances, it will only serve to disconnect even more remote and at-risk households.

Given the myriad concerns raised here, the Commission should find that neither the first prong, nor the second prong of the ART are able to be met. Therefore, the Commission should remove these applications from the streamlined track or deny them altogether.

b. Satellite Service is not an Adequate Replacement.

AT&T also suggests that the Commission's recent push to deploy more satellite services will make satellite an adequate replacement for its legacy network offerings. This assertion, however, is patently false.²⁶ First, AT&T admits that the Commission has not recognized satellite service as an adequate replacement.²⁷ The Commission should not do so here, because AT&T does not request that determination or provide any testing data that would allow the Commission to adequately determine acceptability. Second, AT&T notes that Starlink, Amazon Leo, Globalstar, and AST SpaceMobile are deploying swiftly, and that speed and latency are improving with low earth orbit (LEO) technology.²⁸ However, some satellite providers have had

<https://www.ctif.org/news/fire-telephone-facility-knocked-out-911-call-centre-battery-bank-complicated-firefighting>.

²⁵ Brian White, Weeks-Long AT&T Outage in Shelter Valley, Near Julian, Raises Safety Concerns For Rural Residents, CBS8 (updated Mar. 24, 2026),

<https://www.cbs8.com/article/news/local/weeks-long-att-outage-in-shelter-valley-near-julian-raises-safety-concerns/509-45912510-da7f-4f18-be52-c8e31f0d5f74>.

²⁶ AT&T 63.71 Application at 10.

²⁷ *Id.* at 10.

²⁸ *Id.* at 10-11.

was unlawful and harmed its members.³⁶ The second is *Ohio Telecom Association v. FCC, et al.*, a Sixth Circuit case arguing the same issues as in the fifth circuit case.³⁷ On May 13, 2026, these cases were consolidated, and the Sixth Circuit was chosen as the circuit in which the suits will proceed.³⁸

The nature of these cases and their asks to determine whether the Commission has gone far enough leaves the finality of the FCC's interpretation of the *Network Modernization Order* uncertain. For this reason, the Commission should decline to act on both of AT&T's petitions until such time that the Sixth Circuit has issued a ruling and the Commission can properly apply that ruling to the facts found here. Doing so beforehand places significant liability on the Commission if the Sixth Circuit overturns its interpretation and invites further litigation. Waiting until the consolidated case is settled provides far more certainty that any actions the Commission takes will be rooted in judicial precedent.

IV. Allowing AT&T to Discontinue Service Will Have Significant Negative Impacts on the Communities It Serves.

The record already contains myriad examples of the harm that the proposed discontinuances will have on the residents and businesses of California. Commenters have already shared how cellular signals are unable to reach their homes or fail during power outages, which can cause inability to reach emergency services, the failure of home alarm and medical

³⁶ See *Texas Ass'n of Bus v. Fed. Commc'n Comm'n*, No. 26-60304 (5th Cir. Filed Apr. 29, 2026) at 3 (available at <https://storage.courtlistener.com/recap/gov.uscourts.ca5.229855/gov.uscourts.ca5.229855.1.1.pdf>).

³⁷ See generally, *Ohio Telecomm. Ass'n v. Fed. Commc'n Comm'n*, No. 26-3375 (6th Cir. Filed May 13, 2026) (available at <https://storage.courtlistener.com/recap/gov.uscourts.ca6.158573/gov.uscourts.ca6.158573.1.2.pdf>).

³⁸ See Consolidation Order at 2.

alert technologies, and lack of access to critical public safety information during a natural disaster.³⁹

However, other community members, such as those who are D/deaf, blind, or otherwise disabled, will find AT&T's identified alternatives inaccessible. In many instances, VoIP technologies cannot interface with existing assistive technology.⁴⁰ Similarly, other participants at an August 22, 2025, California Public Utilities Commission (CPUC) workshop shared concerns that California Connect (also known as the Deaf and Disabled Telecommunications Program)

³⁹ See Comments of M. Boyer, WC Docket Nos. 26-120, 26-121, 26-123, 26-125 (June 12, 2026); Comment of M. Anthony, WC Docket Nos. 26-120, 26-121, 26-123, 26-125 (June 12, 2026); Comment of Kathleen Robbiano and Cara Monson, WC Docket Nos. 26-120, 26-121, 26-123, 26-125 (June 12, 2026); Comment of R. Boyer, M.D., WC Docket Nos. 26-120, 26-121, 26-123, 26-125 (June 12, 2026); Comment of E. Boyer, WC Docket Nos. 26-120, 26-121, 26-123, 26-125 (June 11, 2026); Comments of Liz Helenchild, WC Docket Nos. 26-120, 26-121 (June 11, 2026); Comments of Martha Evans, WC Docket No. 26-120 (June 11, 2026); Comments of Cynthia Larson, WC Docket Nos. 26-120, 26-121 (June 11, 2026); Comments of Jennifer Estes, WC Docket Nos. 26-120, 26-121, 26-123 (June 11, 2026); Comments of Lee Boatwright, WC Docket No. 26-120 (June 8, 2026); Comment of Steve Hogle, WC Docket Nos. 26-125, 26-123, 26-120, 26-121 (June 8, 2026); Comment of Jean Arnold and Thomas Digulla, WC Docket No. 26-120 (June 8, 2026); Comment of Gary Bjorklund, WC Docket No. 26-120 (June 7, 2026); Comment of Nina Schneider, WC Docket No. 26-121 (June 8, 2026); Comments of Kim Hrac and Andy Schoenwetter, WC Docket No. 26-120 (June 2, 2026); Comment of Vona Brown, WC Docket No. 26-120 (June 1, 2026); Comment of Austin Martinetti, WC Docket Nos. 26-120, 26-121 (June 1, 2026); Comment of June Seliber-Klein, WC Docket No. 26-120 (June 8, 2026); Comment of Rold Knitter, WC Docket No. 26-121 (June 2, 2026); Comments of George E. McLam, WC Docket No. 26-121 (May 27, 2026); Comment of John Doyle, WC Docket No. 26-121 (May 22, 2026).

⁴⁰ See, e.g., Greg Hilbok, August 22, 2025, Workshop Recording, available at <https://www.youtube.com/watch?v=OW7wNgqPXZ8&t=8809s>, at 1:30:16-1:32:06 ("We have all of these options, but at the same time . . . some have been overlooked . . . People are still relying on TTY, landlines . . . [A] good number of users are depending on TTY and landline . . . and now there's more resources available from TTY all the way to iPhones . . . [C]ompatibility with the IP network really varies based on the individual's needs. It's not a one-size-fits-all in general. We've made great advancements with IP-based for [video relay service], but we don't have Deaf and blind options for that yet, we don't have any . . . tactile. Those people have kind of been left out, and some senior citizens as well who still are not technologically savvy.")

and the California Relay Service are unable to make the switch to an IP-based system given incompatibilities in technologies.⁴¹

Additionally, other panelists raised concerns about fire alarm transmissions, life safety systems, and emergency response.⁴² Panelists also explained that claims made by providers, such as AT&T, that there are alternative services such as VoIP, can interfere with central station systems and fail during power outages.⁴³ Representatives from the California Department of Transportation (Caltrans) District 2 noted how central plain old telephone service (POTS) is for their transportation management system. Caltrans District 2 also explained that it relies on Integrated Services Digital Network provided over legacy copper networks.⁴⁴ In 2024, Caltrans' transportation management system included about one-hundred closed circuit televisions, 24 road weather information systems, 30 to 35 changeable message signs, and a system of highway advisory radio and flashing beacons to provide information to motorists.⁴⁵ The transportation

⁴¹ Katie Wright, August 22, 2025, Workshop Recording, at 1:33:22-1:34:32 (“I just want to be sure that the 200,000 customers that Deaf and Disabled Telecommunications Program, that they have are not going to get left behind, that they’re not going to be left out. As it stands right now, DDTP is not prepared to go to a VoIP-based program . . . Not even our newer telephones, which supposedly are internet-based, I have heard that is not reliable . . . We have to be able to offer equipment that is internet-based.”); Katie Wright, August 22, 2025, Workshop Recording, at 2:19:01-2:19:47 (“I think it’s vital that we don’t discontinue what we already have in place. If there’s free access to relay services or whatever is a free service now, a free basic service now, should be continued in whatever is replacing copper wire. It’s essential . . . The poverty level of the disabled is a reality, and we have to consider that.”).

⁴² See Opening Comment of The Utility Reform Network and Center for Accessible Technology on the Administrative Law Judge’s Ruling Regarding Comments on Topics Discussed at August 22, 2025 Workshop, file in CPUC Docket R.24-06-012 (filed June 20, 2024) at 22-23 (“The network supporting the carrier of last resort services is very vital for life safety systems, alarm monitoring, fire alarm transmissions, emergency response. Specifically, these alarm systems are in homes, businesses, it includes fire, intrusion, panic alarm, temperature supervision, elevator monitoring. All of these systems still rely on legacy POTS lines in order to function, especially, as stated before, in rural areas where there isn’t any other communication option.”).

⁴³ *Id.* at 23.

⁴⁴ *Id.*

⁴⁵ *Id.* at 23-24.

While these comments are not a comprehensive list of the harms caused by VoIP service outages, these outages highlight the likely outcomes if legacy POTS services are retired without a reliable alternative ready to take its place. Joint Commenters support modernizing networks, but the Commission cannot allow residents, business, and communities to bear these risks simply because a company wishes to reduce costs.

V. CONCLUSION

Joint Commenters appreciate the opportunity to provide input on this important issue. As the Commission decides whether to grant the petitions of AT&T, it cannot think only about what is best for the telecommunications industry but also what will happen to those who are left behind. The Commission's mandate is to protect public safety. To agree with AT&T here is directly antithetical to that mandate and will put consumers, businesses, schools, and hospitals at more risk if their communications fail.

EXHIBIT I



BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA

Order Instituting Rulemaking Proceeding to
Consider Changes to the Commission's
Carrier of Last Resort Rules.

Rulemaking 24-06-012
(Filed June 20, 2024)

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**REPLY COMMENTS OF THE UTILITY REFORM NETWORK ON THE
ADMINISTRATIVE LAW JUDGE'S RULING REGARDING COMMENTS ON TOPICS
DISCUSSED AT AUGUST 22, 2025 WORKSHOP**

(PUBLIC VERSION)



Regina Costa
Telecom. Policy Director

Alexandra Green
Telecom. Regulatory Attorney

The Utility Reform Network
360 Grand Ave. #150
Oakland, CA 94610
Phone: (415) 954-8091

rcosta@turn.org

agreen@turn.org

December 4, 2025

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incomplete, particularly for existing installed systems that represent decades of infrastructure investment by both property owners and alarm companies.⁶⁷

USTelecom's claim about the compatibility of ancillary services with next generation technologies is similar to AT&T's argument that ancillary services that connect over other types of legacy TDM lines that "have no relationship to the COLR's status," and that therefore the relationship between COLR withdrawal and impacts on ancillary services are beyond the scope of the proceeding.⁶⁸ While it is true that the COLR obligation applies to basic service for residential and business customers, it is also true that AT&T itself has linked the COLR obligation with the continued provisioning of legacy TDM service. AT&T's top executive informed Wall Street investors that he intends to shut down the copper network, "turn out the lights" and "walk away" from continuing to provide fixed infrastructure that is used to serve customers in geographic areas with low utilization and low profitability.⁶⁹ In layman's terms, it means discontinuing legacy TDM services, regardless of *what* that service is. It is highly unlikely that AT&T would discontinue its TDM service for just POTS customers but continue maintaining the legacy network for other services in areas that it deems unprofitable. AT&T has already started down that path by failing to repair its network, failing to repair lines serving customers, and refusing to provide legacy service to customers who request it.⁷⁰ If AT&T is permitted to withdraw as a COLR and insists that other alternative services are available, the decision to do so will also affect the service options available to all customers in the affected

⁶⁷ AICC FCC Reply Comments pp. 4-5 (internal citations omitted).

⁶⁸ AT&T Opening Comments at p. 13.

⁶⁹ Joint Commenters Opening Comments at p. 21, fn. 67.

⁷⁰ *See, e.g.*, Opening Comments of TURN and CforAT on the Administrative Law Judge's Ruling Regarding Comments on Topics Discussed at the April Workshops, June 13, 2025, at pp. 9-12 (responding to the question: For all parties, should the Commission adopt any additional policies to address customer complaints about being improperly or inadvertently denied access to basic service?).

geographic area who rely on the legacy network, regardless of whether they purchase a single residential, or a single business line, or a copper line that would be phased out. TURN believes that the questions posed by the Commission regarding ancillary services are part of the Commission's effort to perform proper due diligence to fully understand the potential impacts of COLR withdrawal and related technology transition issues.

C. The Commission should be skeptical of AT&T's claims that it will leave no customer behind.

Throughout this proceeding, AT&T California has stated its commitment to not leave any customer behind in the transition to modern high-speed fixed and mobile broadband networks and services: "The staged nature of AT&T California's proposals for COLR modernization, based on the availability of an alternative voice service and with a process for customers who disagree about service availability, will ensure the continuity of communications services."⁷¹ AT&T argues that none of the problems with alternative services or technology transitions are inconsistent with AT&T's proposals because AT&T only wants COLR withdrawal in places where there are no alternatives. This claim is disingenuous. For example, in AT&T's application for large-scale COLR withdrawal, it claimed that the vast majority of its service territory is "well served," despite the fact that this territory includes areas where it is well known that cellular service is spotty or non-existent.

D. SBUA also raises other important ancillary services the Commission should consider.

In its opening comments, Small Business Utility Advocates (SBUA) list a number of ancillary services essential to small business operations, such as older point-of-sale systems,

⁷¹ AT&T Opening Comments at p. 14.

consumers to fully utilize their voice service, and the Commission should reject proposals to remove these elements from basic service.

VII. CONCLUSION

Joint Commenters appreciate the opportunity for further discussion on the important issues raised at the August 22, 2025, workshops and look forward to reviewing other parties' responses.

Dated: December 4, 2025

Respectfully submitted,

By: 

Alexandra Green

Alexandra Green,
Telecom. Regulatory Attorney
THE UTILITY REFORM NETWORK

EXHIBIT J



State 9-1-1 Advisory Board Meeting

May 14, 2025



Item 3-1: Annual Statistics

Total 9-1-1 Calls	2021	2022	2023	2024
Total	27,253,585	26,302,238	26,790,408	25,667,932
Wireless	23,242,971 (85%)	22,514,099 (86%)	23,315,779 (87%)	22,228,557 (87%)
Wireline	1,810,942 (7%)	1,514,134 (6%)	1,293,631 (5%)	1,026,837 (4%)
Voice over IP	1,476,428 (5%)	1,687,529 (6%)	1,579,993 (6%)	1,604,276 (6%)
Other including Telematics	627,705 (2%)	586,476 (2%)	529,657 (2%)	699,423 (2%)
Text to 9-1-1	95,539 (<1%)	90,326 (<1%)	98,065 (<1%)	108,839 (<1%)

May 14, 2025

California State 9-1-1 Advisory Board

5

Ex. J_003

EXHIBIT K



BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA

Order Instituting Rulemaking Proceeding to
Consider Changes to the Commission's
Carrier of Last Resort Rules.

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(Filed June 20, 2024)

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**THE UTILITY REFORM NETWORK'S REPLY COMMENTS IN RESPONSE TO THE
ADMINISTRATIVE LAW JUDGE'S RULING ON COMMENTS TO JOINT
PROPOSAL OF AT&T CALIFORNIA AND CAL ADVOCATES**



Regina Costa
Telecom. Policy Director

Kori Cordero
Telecom. Managing Attorney

The Utility Reform Network
360 Grand Ave. #150
Oakland, CA 94610
Phone: (415) 954-8091

E-mail: rcosta@turn.org

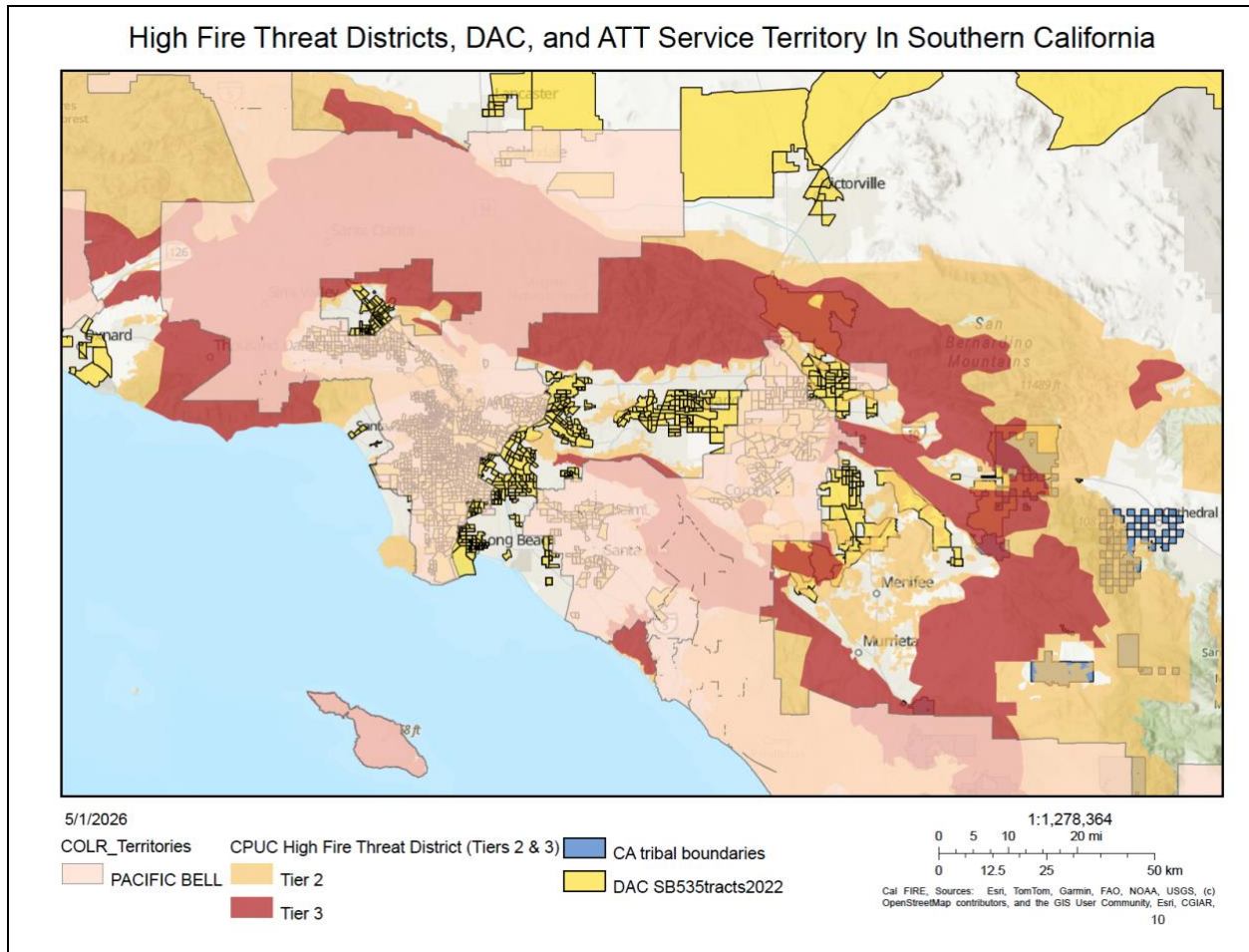
May 1, 2026

Ex. K_002

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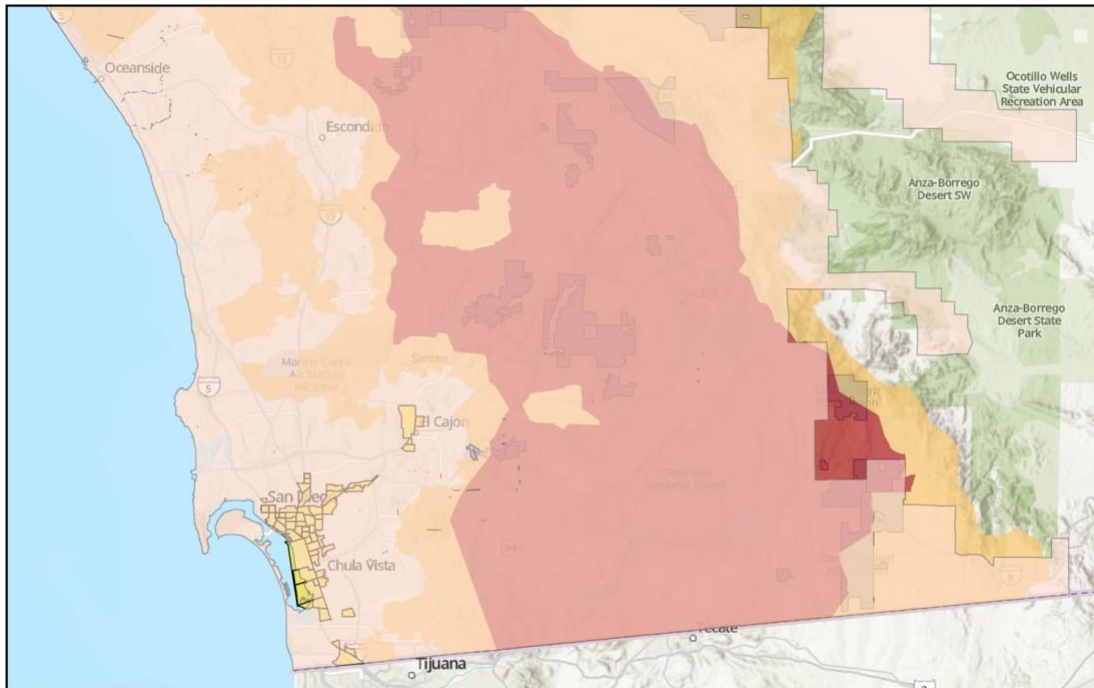
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affordability crisis is enough to dismiss the Joint Proposal entirely.⁴² The maps in this Reply Comment were created with CPUC map layers and AT&T's service territory map as provided in A.23-03-003, and are also attached as "Appendix A."



⁴² Please see Appendix A for larger versions of the maps shown in this section of TURN's Reply Comments.

High Fire Threat, DAC, and ATT Service Territory (Greater San Diego)



5/1/2026

COLR_Territories

PACIFIC BELL

CPUC High Fire Threat District (Tiers 2 & 3)

Tier 2

Tier 3

CA tribal boundaries

DAC (SB535 tracts 2022)

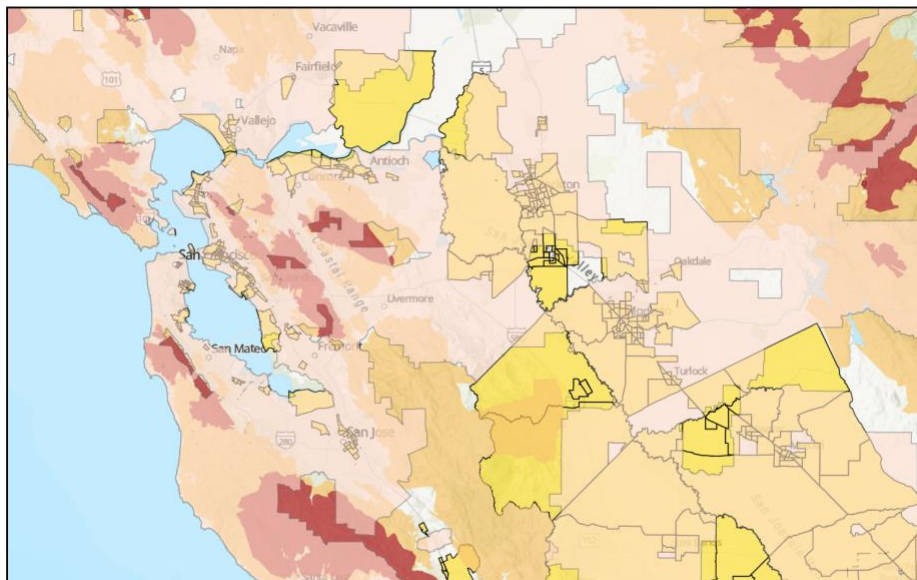
1:639,182

0 4.5 9 18 mi

0 5 10 20 km

Cal FIRE. Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, 12

High Fire Threat, DAC, and ATT Service Territory (Bay Area + Central)



5/1/2026

COLR_Territories

PACIFIC BELL

CPUC High Fire Threat District (Tiers 2 & 3)

Tier 2

Tier 3

CA tribal boundaries

DAC (SB535 tracts 2022)

1:1,278,364

0 5 10 20 mi

0 12.5 25 50 km

Cal FIRE. Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, 11

F. Further TURN Reply to Other Party Comments

In addition to refusing the Large COLRs recommendations designed to water down an already inadequate Joint Proposal, TURN recommends the Commission consider the many concerns identified by other parties to the proceeding. TURN generally agrees with, and echoes, the concerns stated by consumer advocates in their respective Opening Comments opposing adoption of the Joint Proposal.⁴³ Indeed, many of the concerns of consumer advocates were bolstered by Opening Comments of the Large COLRs.

While the Joint Proposal is full of many “loopholes”⁴⁴ and vague language⁴⁵ that TURN and others were concerned would be exploited to the benefit of AT&T and other Large COLRs; the Opening Comments from Large COLRs brought these concerns into sharp relief. For example, Consolidated requests that the Commission adopt the Joint Proposal with modifications that codify loopholes to ensure that providers are not obligated to do anything that might be in the public interest or otherwise realize any purported benefits of the Joint Proposal. Consolidated would like the Commission to guarantee that:

- COLRs will not have to deploy fiber to any locations that already lack 1 Gbps service⁴⁶ (which would ensure that households currently without 1 Gbps service would remain without *and* lose their right to essential communications services);
- COLRs can meet the fiber deployment requirement through completion of already planned builds and build zero new fiber projects;⁴⁷ and,
- COLRs can gerrymander a “Relief Area”⁴⁸

Such bold demands make it clear that AT&T and Large COLRs do not wish to, and cannot be trusted to, expand fiber deployment or meet the needs of all Californians. Instead, as always, large COLRs will maintain the digital divide and only prioritize serving customers in high-profit areas.

⁴³ Including CA Farm Bureau, CforAT, CADE, EMF Safety Network, EQUAL, Media Alliance, and RCRC.

⁴⁴ CforAT at 1, 2, and 9.

⁴⁵ CforAT at 11

⁴⁶ Consolidated at 5.

⁴⁷ Consolidated at 5.

⁴⁸ Consolidated at 6.

III. CONCLUSION

It is no surprise that California's largest COLRs support revisions to the COLR rules that would quickly eliminate their obligation to serve at the expense of Californians. The "alternative path" sketched out in the AT&T/Cal Advocates Joint Proposal provides a fast track for ceasing the provision of essential service, with no backstop if the claimed alternative services are found to be unreliable, incapable of providing all customers with access to 911 and emergency alerts, or are not financially viable. Moreover, as discussed in detail in TURN's opening comments, the carrier's preferred plan would set the stage for discriminatory treatment of customers, with fiber being deployed at the discretion of carriers to only a small fraction of customers while all customers would lose COLR protections. The staff proposal is not perfect and should be refined but is the appropriate path to follow. TURN respectfully request the Commission reject the Joint Proposal and modifications suggested

Dated: May 1, 2026

Respectfully submitted,

By: /s/ Regina Costa

Regina Costa,
Telecom. Policy Director
THE UTILITY REFORM NETWORK

EXHIBIT L



BEFORE THE PUBLIC UTILITIES COMMISSION OF

THE STATE OF CALIFORNIA

Order Instituting Rulemaking Proceeding to
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**OPENING COMMENTS OF THE UTILITY REFORM NETWORK AND CENTER FOR
ACCESSIBLE TECHNOLOGY ON THE ADMINISTRATIVE LAW JUDGE'S RULING
REGARDING COMMENTS ON TOPICS DISCUSSED AT APRIL WORKSHOPS**

Regina Costa
Telecom. Policy Director

Alexandra Green
Telecom. Regulatory Attorney

The Utility Reform Network
360 Grand Ave. #150
Oakland, CA 94610
Phone: (415) 954-8091
rcosta@turn.org
agreen@turn.org

Paul Goodman, Legal Counsel

Center for Accessible Technology
3075 Adeline Street, Suite 220
Berkeley, CA 94703
Phone: (510) 841-3224
Fax: (510) 841-7936
service@cforat.org

June 13, 2025

Ex. L_002

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1.	Is there any legal barrier, or anything about the COLR rules, preventing a COLR from offering basic service using a fiber or wireless network? If such a barrier exists, what can we do to address that?	1
2.	Is there any technological barrier preventing a COLR from offering basic service using a fiber or wireless network? If such a barrier exists, what can the Commission do to address that?3	
3.	If the above statement by AT&T is not correct, please explain why a tariffed service relying on a fiber or wireless network cannot be offered.	4
4.	If adequate infrastructure and coverage are in place today to satisfy customer demand for basic service through technologies other than Plain Old Telephone Service (POTS) over copper lines (implying that COLR obligations are not necessary to ensure access to communications services), why are COLRs not delivering basic service over that non-POTS infrastructure already? Specifically, why are COLRs that offer communications services over fiber or wireless infrastructure not offering basic service over that same infrastructure?	4
B.	Certain COLRs, as well as US Telecom, have argued that COLRs face a competitive disadvantage versus non-regulated carriers, such as cable companies. Is this true? Assuming this is true, is there a justification for continuing the asymmetric treatment of COLRs versus other carriers, meaning COLRs operate with more regulation than competitors such as cable companies or wireless carriers?	4
C.	If the Commission chooses to rely on competition for parts of California with multiple competing communications providers to ensure service instead of COLR obligations, how should the Commission manage the risks of consolidation in the industry reducing that competitive pressure or reducing the availability of critical communications services? If the Commission were to observe increasing market concentration4 in a part of the state where it had removed COLR requirements, would it be feasible to reinstate a COLR to address the reduced competition or reduced availability of critical communications services at a later time? Why or why not? Would there be other regulatory regimes that would protect against the risk of market concentration?.....	6
D.	For COLRs who are parties to this proceeding, please describe the specific steps necessary for a customer to subscribe to basic service, including but not limited to how this service is advertised on your website and what instructions are provided to customer service representatives to assist customers in subscribing to basic service. For all parties, should the Commission adopt any additional policies to address customer complaints about being improperly or inadvertently denied access to basic service?	9
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1. **At the April 4 Workshop, rural county officials asked the Commission to exclude rural areas from COLR withdrawal for now. Additionally, it appears that Nevada permitted provider of last resort (Nevada's equivalent to COLR) withdrawal in urban areas but not rural areas, as Commissioner Brown estimated that 90 percent of Nevada's households no longer had COLR service, while more than half of Nevada's geography still is served by a COLR. Should the Commission continue to require COLR obligations in rural or low-household-density areas? How should the Commission determine what areas are categorized as rural?**

Joint Commenters are reviewing this issue and reserve the right to respond in reply comments.

2. **At the April 11 Workshop, the representative of Consolidated Communications asserted that the relatively flat terrain of Consolidated Communications' service territory may mean concerns about wireless coverage overstatement, or a lack of reliability are not experienced by customers living in the general area. Should the Commission consider terrain when considering wireless availability and reliability? How could it do so? (Dave, Regina to share RCRC email)**

As noted above, topography, terrain, and vegetation all impact propagation of wireless radio signal. Moreover, this impact on radio signal propagation changes over time as vegetation and trees grow and buildings and other structures are built. The Commission should not surmise that wireless service is "good enough because the ground is flat" to allow for the withdrawal or substitution of essential COLR service. This ignores real impacts on wireless propagation caused by terrain, topography, vegetation, and structures.

Moreover, as discussed above, since wireless service relies on sharing radio spectrum among users, whether a consumer actually has wireless service at a particular time depends on how many other consumers are using spectrum capacity and for what use. Shared radio spectrum is subject to congestion during power outages or other emergencies to the point that wireless service is unusable. If a cell tower fails, traffic is rerouted to remaining cell sites, which adds to what is likely already very high congestion due to consumers attempting calls during the emergency.

III. CONCLUSION

Joint Commenters appreciate the opportunity to weigh in on the range of issues presented in the April 2025 workshops and look forward to continuing these discussions in reply comments.

Dated: June 13, 2025

Respectfully submitted,

/s/ Regina Costa

Regina Costa

Telecommunications Policy Director

/s/ Alexandra Green

Alexandra Green

Telecommunications Regulatory Attorney

The Utility Reform Network

360 Grand Ave., # 150

Oakland, CA 94610

(415) 954-8091

agreen@turn.org

rcosta@turn.org

Authorized to sign on behalf of CforAT.

EXHIBIT M

COM/MBL/avs

Date of Issuance 7/20/2020

Decision 20-07-011 July 16, 2020

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking
Regarding Emergency Disaster Relief
Program.

Rulemaking 18-03-011

**DECISION ADOPTING WIRELESS PROVIDER
RESILIENCY STRATEGIES**

R.18-03-011 COM/MBL/avs

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Most critically, wireless communications failed at critical times during wildfire and PSPS events which resulted in many wireless customers being unable to make calls during times of emergency or disaster. Many Californians have no alternative means of communications than their wireless network; without that wireless network they simply cannot communicate.

Importantly, we note that as of December 31, 2018, there were 45,335,804 wireless subscribers in California and 13,418,711 wireline subscribers.¹³¹ The number of wireline customers has steadily decreased as consumers rely more on wireless service.¹³² In 2019, approximately 27.4 million 9-1-1 calls were placed via wireless service as compared to approximately 3.6 million placed via wireline service.¹³³

In 2017, 9,270 wildfires burned 1,548,429 acres, damaging or destroying 10,280 structures, and killing 47 people. The largest fires burned in Northern California during the month of October. One of those fires was the Tubbs Fire, in Napa, Sonoma, and Lake counties, which was one of the most destructive fires in California history burning 36,807 acres, resulting in 22 deaths. The Thomas Fire

¹³¹ Data source: FCC form 477 data. The total wireline subscriber counts include both POTS and VoIP, at 5,117,816 and 8,300,895, respectively.

¹³² See FCC Form 477 data.

¹³³ See <https://www.caloes.ca.gov/>

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Communications Division staff measured the impact of the 2017-2019 wildfires and PSPS events by analyzing the wireless service providers' MSI and DIRS¹³⁵ reports and calculated the number of potentially affected wireless users, macro cell sites, and blocked calls. Their findings are illustrated in the table below:

**Estimated Impact from 2017-2019 Wildfires and PSPS Events
on Wireless Service in California**

Year	Events	Number of Potentially Impacted Wireless Customers ¹³⁶	Approximate Number of Impacted Cell Sites	Approximate Number of Blocked Calls ¹³⁷
2017	Napa and Sonoma County Wildfires ¹³⁸	96,097	248	814,041
2017	Mendocino and Humboldt County Wildfires	104,441	46	8,271,992
2017	Southern California Wildfires ¹³⁹	97,811	457	434,086
2018	Camp Fire Butte County	48,414	51	2,165,308
2018	Hill and Woolsey Fires Southern CA	512,231	492	4,228,585
2019 ¹⁴⁰	Kincade Fire and Statewide PSPS	1,122,645	224	n/a ¹⁴¹

¹³⁵ DIRS is activated by the FCC during large-scale emergencies and is used by providers to submit reports on the status of their network infrastructure. DIRS participation however, is voluntary. <https://www.fcc.gov/general/disaster-support-broadcasters>

¹³⁶ 47 C.F.R. § 4.9(e)(2) - In determining the number of users potentially affected by a failure of a switch, a wireless provider must multiply the number of macro cell sites disabled in the outage by the average number of users served per site, which is calculated as the total number of users for the provider divided by the total number of the provider's macro cell sites.

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The most severe impacts of these fires were in high fire-threat areas, where there were repeated reports of cell site failures, particularly in the 2018 Camp Fire in Butte County (town of Paradise). Then in 2019, substantial numbers of wireless sites in Butte County were inoperative because of the PSPS events. Additionally, the FCC reported that up to 57% of Marin County cell towers went down at the peak of the October PSPS events, where it appeared the only operative factor was the lack of power.¹⁴²

The catastrophic wildfires of 2017, 2018, and 2019 garnered significant public attention. Press coverage detailed numerous firsthand accounts of the wireless provider network failures during the three consecutive wildfire seasons

¹³⁷ The number of blocked calls is an approximation based on a ratio of a provider's number of impacted cell sites compared to the average number of calls handled by those cell sites.

¹³⁸ Napa and Sonoma County wildfires include but are not limited to: Adobe, Atlas Peak, Norborn, Nuns, Oakmont, Partrick, Pocket, Pressley, and Tubbs.

¹³⁹ Southern California wildfires include but are not limited to: Rye (LA County), Creek (LA County), and Thomas (Santa Barbara and Ventura Counties).

¹⁴⁰ DIRS was activated in California from October 24 – November 1 2019. However, multiple providers did not submit MSI reports during this time because the FCC does not require NORS reporting for areas covered by DIRS activations. This led Staff to derive the 2019 Kincade Fire and PSPS impact data primarily from the providers' voluntary DIRS reports. The numbers of potentially impacted wireless customers and cell sites are only approximate and both likely higher due to the information gap caused by having relatively few MSI reports. Going forward, Staff will use the CPUC's state-based authority to require that providers submit MSI reports even when DIRS is active.

¹⁴¹ The approximate number of blocked calls is not available because the wireless providers did not submit NORS reports while DIRS was activated during this event, and the DIRS reports do not require information on the number of blocked calls.

¹⁴² See FCC Communications Status Report for Areas Impacted by California Public Safety Power Shutoffs, dated October 28, 2019, at <https://docs.fcc.gov/public/attachments/DOC-360482A1.pdf>

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- Identify facilities that do not need backup power, are unable to support backup power due to a safety risk, or that are objectively impossible or infeasible to deploy backup power pursuant to Section 6.6.2., and identify the basis for that determination as well as discuss actions being taken by the wireless provider to mitigate service loss resulting from the lack of backup power at those locations; and
- Identify investment plans to improve network resiliency pursuant to Section 6.6.2. (e.g., deployment of redundant backhaul and deployment of fixed generators).

We direct the Communications Division to develop and adopt standardized reporting templates as well as a submittal schedule for the Communications Resiliency Plans within 60 days from the adoption of this decision.

2. Facilities-based wireless providers shall, in their Communications Resiliency Plan pursuant to Section 6.5.2 of this decision, demonstrate their ability to meet the 72-hour backup power requirement, in Tier 2 and Tier 3 High Fire Threat Districts, consistent with Sections 6.4.2, which adopts the 72-hour backup power requirement in Tier 2 and Tier 3 High Fire Threat Districts for the wireless providers operating in California, 6.4.4, which establishes that the 72-hours of backup power can be met with flexible procurement and deployment, and is a reasonable duration of time to fulfill the backup power requirement, and 6.4.6, which requires the wireless providers to ensure customers and first responders have access to minimum service levels and coverage including 9-1-1 service, 2-1-1, ability to receive alerts and notifications, and basic internet browsing during a disaster or commercial power outage of this decision, as well as describe their ability to maintain a minimum level of service

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and their long-term investment plan to comply with the 72-hour backup power requirement of this decision.

3. Facilities-based wireless providers shall file emergency operations plans pursuant to Section 6.8.2 of this decision, on an annual basis, with the first due within 60 days of the effective date of this decision to the Director of the Communications Division, the California Governor's Office of Emergency Services, and local emergency response agencies, as an information only filing that contains the wireless provider's: (1) emergency operations plan; (2) emergency contact information; (3) emergency preparedness exercise attestation; and (4) public communications plans.

4. Upon the effective date of this decision, the wireless providers, when implementing the requirements of this decision, shall comply with the orders of the Governor's Executive Order N-33-20, the California State Public Health Officer, and the Director of the California Department of Public Health shelter-in-place directives, social distancing directives, and/or other measures that may need to be taken in response to the COVID-19 pandemic.

5. Rulemaking 18-03-011 remains open.

This order is effective today.

Dated July 16, 2020, at San Francisco, California

MARYBEL BATJER

President

LIANE M. RANDOLPH

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

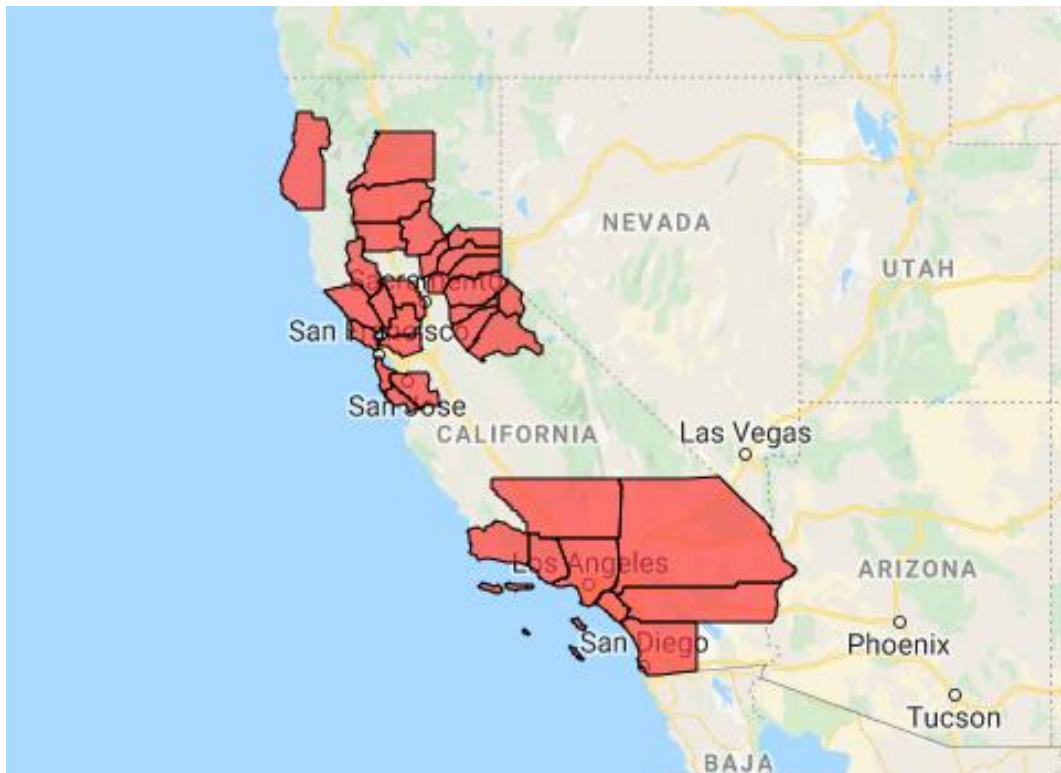
EXHIBIT N

Communications Status Report for Areas Impacted by California Public Safety Power Shutoffs October 27, 2019

The following is a report on the status of communications services in geographic areas impacted by the power shutoffs as of October 27, 2019 at 11:30 a.m. EDT. This report incorporates network outage data submitted by communications providers to the Federal Communications Commission's Disaster Information Reporting System (DIRS). DIRS is currently activated for 32 affected counties in California. Note that the operational status of communications services during the power shutoffs may evolve rapidly, and this report represents a snapshot in time.

The following counties are in the current geographic area that is part of DIRS.

California: Alpine, Amador, Butte, Calaveras, Contra Costa, El Dorado, Glenn, Humboldt, Kern, Lake, Los Angeles, Marin, Napa, Nevada, Orange, Placer, Riverside, San Bernardino, San Diego, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Shasta, Sierra, Solano, Sonoma, Tehama, Tuolumne, Ventura, Yolo, and Yuba.



As prepared by the Federal Communications Commission: October 27, 2019 11:30 a.m. EDT

Ex. N_002

911 Services

The Public Safety and Homeland Security Bureau (PSHSB) learns the status of each Public Safety Answering Point (PSAP) through the filings of 911 Service Providers in DIRS, reporting to the FCC's Public Safety Support Center, coordination with state 911 Administrators and, if necessary, direct contact with individual PSAPs.

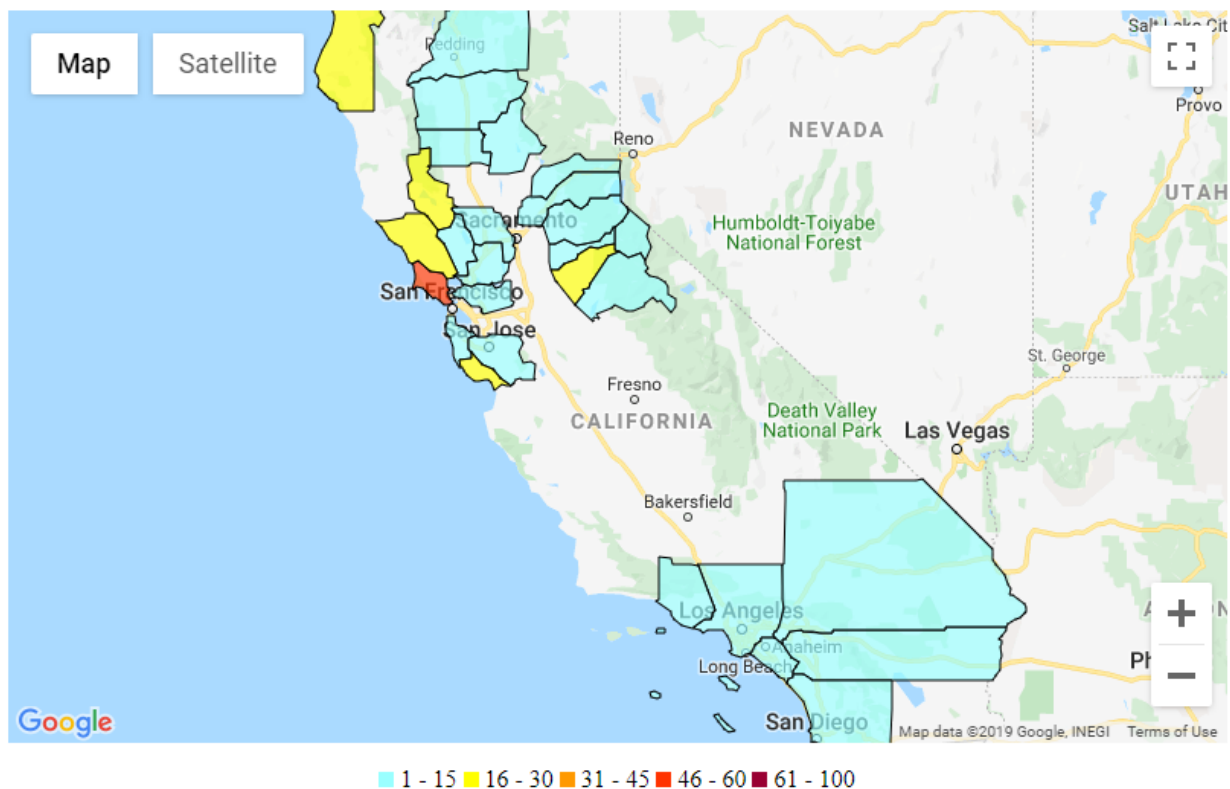
There are no outages affecting PSAPs in the disaster area.

Wireless Services

The following section describes the status of wireless communications services and restoration in the affected area, including the percentage of cell sites out of service for each county.

Percent Cell Sites Out-of-Service By County

10/27/2019 11:09:56 AM



As prepared by the Federal Communications Commission: October 27, 2019 11:30 a.m. EDT

Ex. N_003

The following tables provide cell sites out of service by county. The information shown was provided by the signatories to the Wireless Network Resiliency Framework Cooperative Agreement.

California:

Cell sites out of service due to the power shutoffs: 2.4%

Marin county has 49.6% of its cell sites out of service.

State	Affected Counties	Cell Sites Served	Cell Sites Out	Percent Out	Cell Sites Out Due to Damage	Cell Sites Out Due to Transport ¹	Cell Sites Out Due to Power
CA	ALPINE	8	1	12.5%	0	0	0
CA	AMADOR	40	2	5.0%	0	1	2
CA	BUTTE	174	3	1.7%	0	1	2
CA	CALAVERAS	43	8	18.6%	2	1	4
CA	CONTRA COSTA	928	81	8.7%	6	26	48
CA	EL DORADO	259	16	6.2%	0	1	14
CA	GLENN	33	1	3.0%	0	0	0
CA	HUMBOLDT	299	45	15.1%	10	18	18
CA	KERN	600	0	0.0%	0	0	0
CA	LAKE	57	11	19.3%	0	2	9
CA	LOS ANGELES	7,056	16	0.2%	1	3	5
CA	MARIN	270	134	49.6%	9	10	105
CA	NAPA	129	13	10.1%	0	2	10
CA	NEVADA	123	8	6.5%	0	1	7
CA	ORANGE	2,999	3	0.1%	1	0	2
CA	PLACER	446	16	3.6%	2	6	7
CA	RIVERSIDE	1,770	2	0.1%	1	0	1
CA	SAN BERNARDINO	1,609	2	0.1%	2	0	0
CA	SAN DIEGO	3,969	5	0.1%	3	0	2
CA	SAN MATEO	839	78	9.3%	25	17	31
CA	SANTA BARBARA	339	0	0.0%	0	0	0

¹ These are cell sites that are out due to issues with the (typically wireline) networks that route communications traffic to and from the cell sites.

CA	SANTA CLARA	1,891	30	1.6%	3	10	18
CA	SANTA CRUZ	213	35	16.4%	7	6	21
CA	SHASTA	143	10	7.0%	1	3	5
CA	SIERRA	0	0	0.0%	0	0	0
CA	SOLANO	342	24	7.0%	1	8	14
CA	SONOMA	427	73	17.1%	2	3	67
CA	TEHAMA	63	2	3.2%	0	0	2
CA	TUOLUMNE	36	3	8.3%	1	0	2
CA	VENTURA	580	2	0.3%	0	1	1
CA	YOLO	152	6	3.9%	2	0	4
CA	YUBA	56	0	0.0%	0	0	0
TOTAL		25,893	630	2.4%	79	120	401

The number of cell site outages in a specific area does not necessarily correspond to the availability of wireless service to consumers in that area. See Improving the Resiliency of Mobile Wireless Communications Networks, Order, 31 FCC Rcd 13745, para. 10 (2016) (recognizing the difficulties in accurately depicting the ongoing status of a wireless provider's service during emergencies). Wireless networks are often designed with numerous, overlapping cell sites that provide maximum capacity and continuity of service even when an individual site is inoperable. In addition, wireless providers frequently use temporary facilities such as cells-on-wheels (also known as COWs), increased power at operational sites, roaming agreements, or take other actions to maintain service to affected consumers during emergencies or other events that result in cell site outages.

Cable Systems and Wireline (Combined)

Cable and wireline companies reported 393,735 subscribers out of service due to the power shutoffs; this may include the loss of telephone, television, and/or Internet services.

Broadcast

Television stations status:

12 TV stations reported being operational.
(KCAL-DT, KCBS-DT, KDTV-CD, KFMB-TV, KNSD, KRCA, KSDX-LD, KSWB-TV, KTLA, KUAN-LD, KUSI-TV, KUVS-DT)

No TV stations reported being out of service.

FM Radio stations status:

28 FM radio stations reported being operational.

(K256DA, KAMP-FM, KBBL, KBUA, KBUE, KBZT, KCBS-FM, KEBN, KFBK-FM, KFMB-FM, KHAP, KHYL, KJZY, KPRI, KROQ-FM, KRQB, KRTH, KSON, KTWV, KVMR, KWFN, KWIZ, KWVE-FM, KWVF, KXSN, KYXY, KZFX, KZST)

4 FM radio stations reported being out of service.

(K238AF, KKLJ, KNOB, KSXY)

2 FM radio stations reported being out of service with programming sent to another station.

(KRSH, KXTS)

AM Radio stations status:

4 AM radio station reported being operational.

(KECR, KFMB, KNX, KVNR)

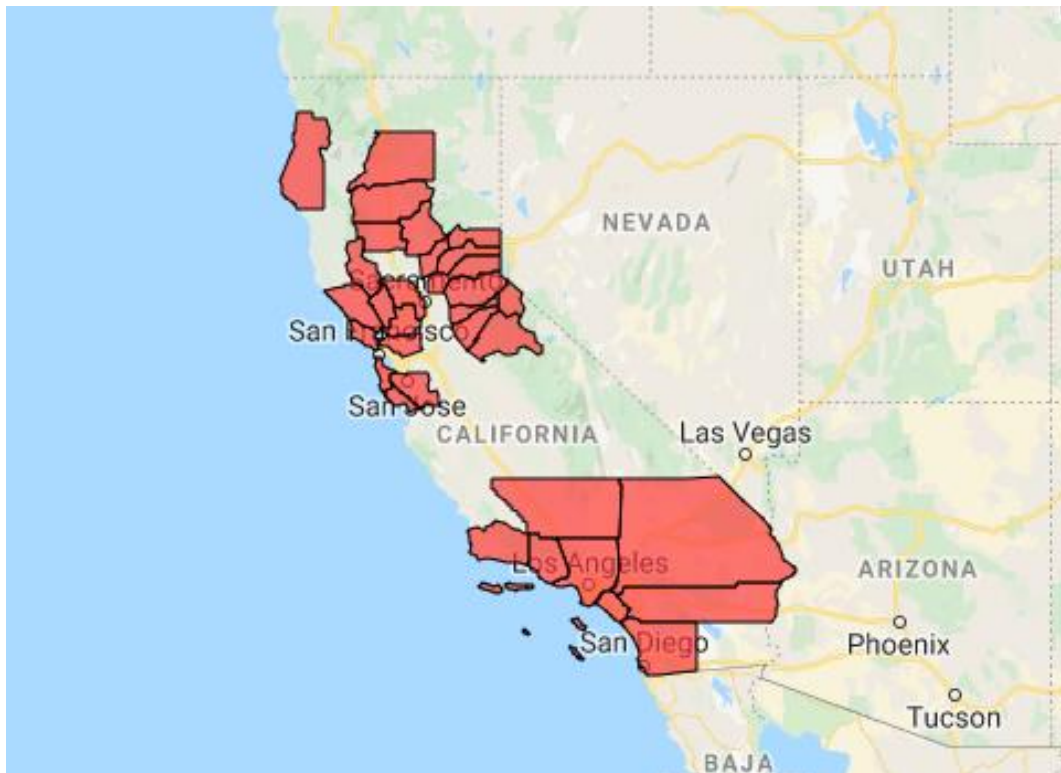
No AM radio stations reported being out of service

Communications Status Report for Areas Impacted by California Public Safety Power Shutoffs October 28, 2019

The following is a report on the status of communications services in geographic areas impacted by the power shutoffs as of October 28, 2019 at 11:30 a.m. EDT. This report incorporates network outage data submitted by communications providers to the Federal Communications Commission's Disaster Information Reporting System (DIRS). DIRS is currently activated for 32 affected counties in California. Note that the operational status of communications services during the power shutoffs may evolve rapidly, and this report represents a snapshot in time.

The following counties are in the current geographic area that is part of DIRS.

California: Alpine, Amador, Butte, Calaveras, Contra Costa, El Dorado, Glenn, Humboldt, Kern, Lake, Los Angeles, Marin, Napa, Nevada, Orange, Placer, Riverside, San Bernardino, San Diego, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Shasta, Sierra, Solano, Sonoma, Tehama, Tuolumne, Ventura, Yolo, and Yuba.



As prepared by the Federal Communications Commission: October 28, 2019 11:30 a.m. EDT

Ex. N_007

911 Services

The Public Safety and Homeland Security Bureau (PSHSB) learns the status of each Public Safety Answering Point (PSAP) through the filings of 911 Service Providers in DIRS, reporting to the FCC's Public Safety Support Center, coordination with state 911 Administrators and, if necessary, direct contact with individual PSAPs.

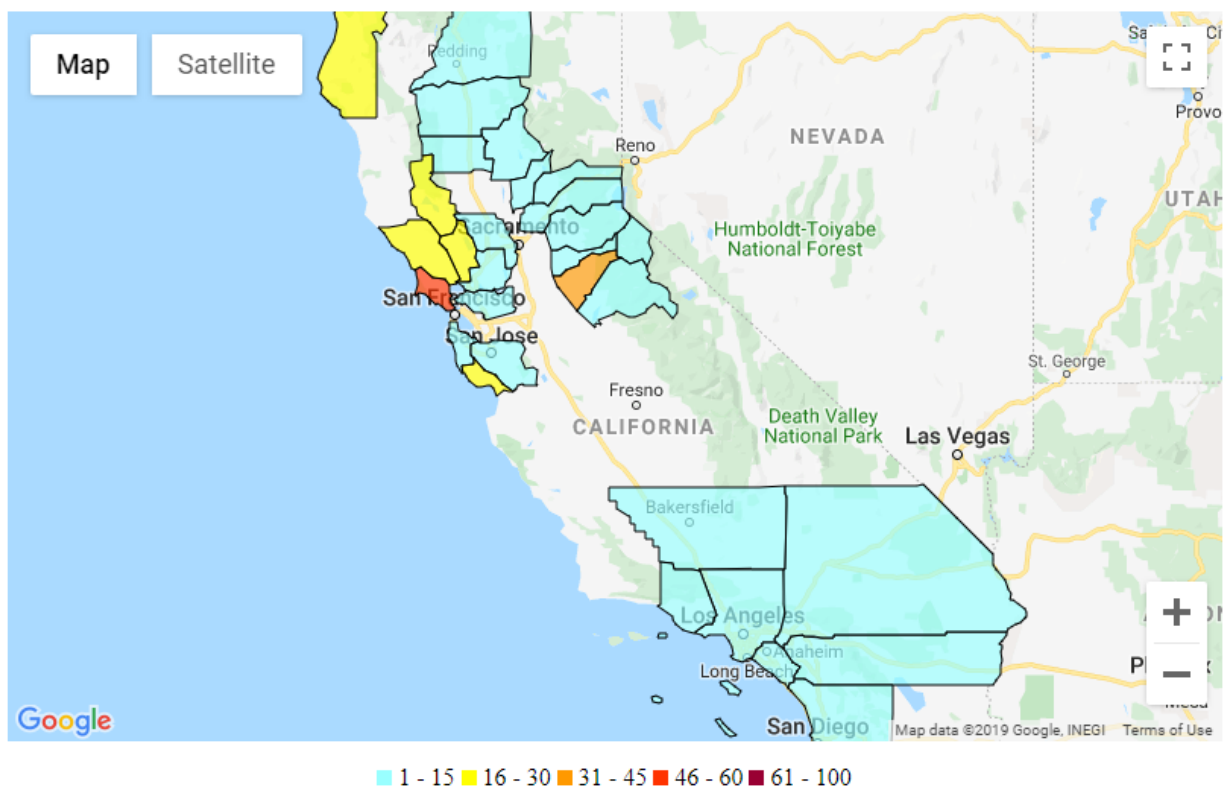
There are no outages affecting PSAPs in the disaster area.

Wireless Services

The following section describes the status of wireless communications services and restoration in the affected area, including the percentage of cell sites out of service for each county.

Percent Cell Sites Out-of-Service By County

10/28/2019 11:09:45 AM



As prepared by the Federal Communications Commission: October 28, 2019 11:30 a.m. EDT

Ex. N_008

The following tables provide cell sites out of service by county. The information shown was provided by the signatories to the Wireless Network Resiliency Framework Cooperative Agreement.

California:

Cell sites out of service due to the power shutoffs: 3.3% (up from 2.4% yesterday)

Marin county has 57.1% (up from 49.6% yesterday) of its cell sites out of service.

State	Affected Counties	Cell Sites Served	Cell Sites Out	Percent Out	Cell Sites Out Due to Damage	Cell Sites Out Due to Transport ¹	Cell Sites Out Due to Power
CA	ALPINE	8	1	12.5%	0	0	0
CA	AMADOR	41	3	7.3%	0	1	3
CA	BUTTE	175	9	5.1%	0	2	8
CA	CALAVERAS	44	17	38.6%	1	3	12
CA	CONTRA COSTA	933	108	11.6%	5	14	88
CA	EL DORADO	258	38	14.7%	0	1	36
CA	GLENN	33	1	3.0%	0	0	0
CA	HUMBOLDT	188	44	23.4%	3	5	37
CA	KERN	600	1	0.2%	0	0	1
CA	LAKE	55	14	25.5%	0	3	11
CA	LOS ANGELES	7,061	16	0.2%	2	4	8
CA	MARIN	280	160	57.1%	9	7	134
CA	NAPA	130	25	19.2%	0	1	23
CA	NEVADA	123	13	10.6%	0	2	11
CA	ORANGE	3,001	3	0.1%	1	0	2
CA	PLACER	446	28	6.3%	2	5	20
CA	RIVERSIDE	1,771	3	0.2%	1	1	1
CA	SAN BERNARDINO	1,896	4	0.2%	3	1	0
CA	SAN DIEGO	3,975	5	0.1%	3	1	1
CA	SAN MATEO	845	96	11.4%	13	14	64
CA	SANTA BARBARA	339	0	0.0%	0	0	0

¹ These are cell sites that are out due to issues with the (typically wireline) networks that route communications traffic to and from the cell sites.

CA	SANTA CLARA	1,893	39	2.1%	3	3	34
CA	SANTA CRUZ	213	48	22.5%	5	6	36
CA	SHASTA	143	15	10.5%	0	4	10
CA	SIERRA	0	0	N/A	0	0	0
CA	SOLANO	342	40	11.7%	0	4	35
CA	SONOMA	436	118	27.1%	5	3	109
CA	TEHAMA	63	8	12.7%	0	1	7
CA	TUOLUMNE	36	5	13.9%	2	0	3
CA	VENTURA	582	4	0.7%	0	2	2
CA	YOLO	193	7	3.6%	2	0	5
CA	YUBA	66	1	1.5%	0	0	1
TOTAL		26,169	874	3.3%	60	88	702

The number of cell site outages in a specific area does not necessarily correspond to the availability of wireless service to consumers in that area. See Improving the Resiliency of Mobile Wireless Communications Networks, Order, 31 FCC Rcd 13745, para. 10 (2016) (recognizing the difficulties in accurately depicting the ongoing status of a wireless provider's service during emergencies). Wireless networks are often designed with numerous, overlapping cell sites that provide maximum capacity and continuity of service even when an individual site is inoperable. In addition, wireless providers frequently use temporary facilities such as cells-on-wheels (also known as COWs), increased power at operational sites, roaming agreements, or take other actions to maintain service to affected consumers during emergencies or other events that result in cell site outages.

Cable Systems and Wireline (Combined)

Cable and wireline companies reported 454,722 (up from 393,735 yesterday) subscribers out of service due to the power shutoffs; this may include the loss of telephone, television, and/or Internet services.

Broadcast

Television stations status:

14 TV stations reported being operational.
(KCAL-DT, KCBS-DT, KDTV-CD, KFMB-TV, KNBC, KNSD, KRCA, KSDX-LD, KSWB-TV, KTLA, KUAN-LD, KUSI-TV, KUVS-DT, KVEA)

No TV stations reported being out of service.

FM Radio stations status:

31 FM radio stations reported being operational.

(K256DA, KAMP-FM, KBBL, KBUA, KBUE, KBZT, KCBS-FM, KDFC, KEBN, KFBK-FM, KFMB-FM, KHAP, KHYL, KISQ, KJZY, KOSC, KPRI, KROQ-FM, KRQB, KRTH, KSON, KTWV, KVMR, KWFN, KWIZ, KWVE-FM, KWVF, KXSN, KYXY, KZFX, KZST)

4 FM radio stations reported being out of service.

(K238AF, KKLJ, KNOB, KSXY)

2 FM radio stations reported being out of service with programming sent to another station.

(KRSH, KXTS)

AM Radio stations status:

4 AM radio station reported being operational.

(KECR, KFMB, KNX, KVNR)

2 AM radio stations reported being out of service.

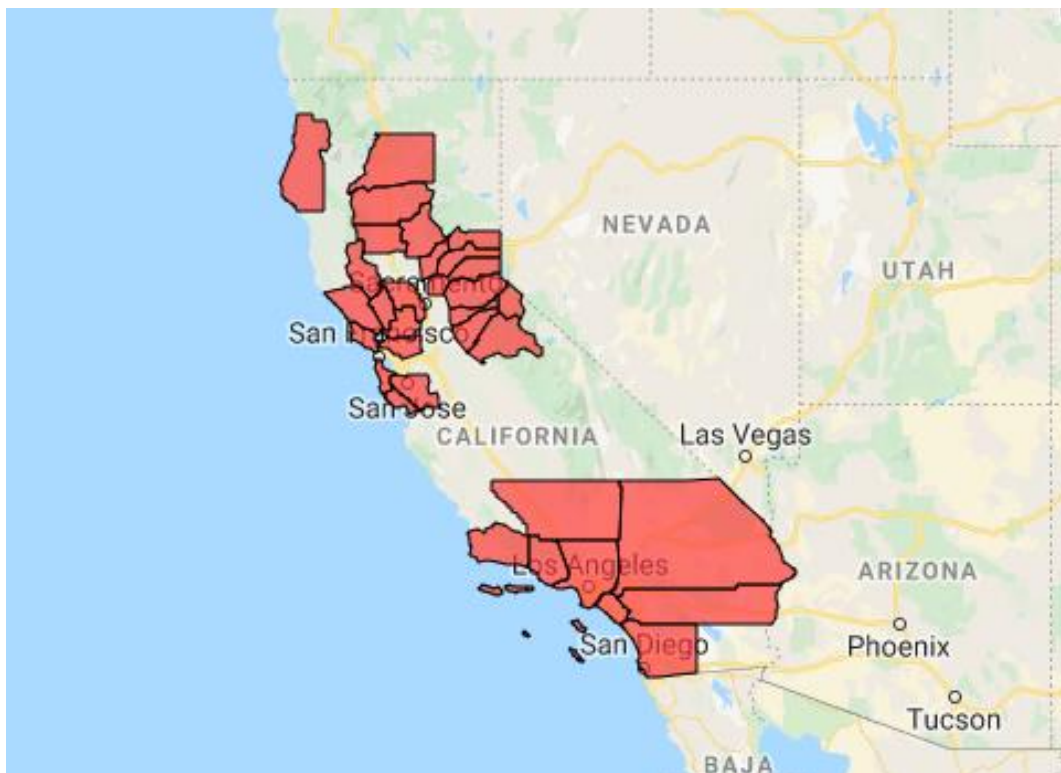
(KIHG, KYAA)

Communications Status Report for Areas Impacted by California Public Safety Power Shutoffs October 29, 2019

The following is a report on the status of communications services in geographic areas impacted by the power shutoffs as of October 29, 2019 at 11:30 a.m. EDT. This report incorporates network outage data submitted by communications providers to the Federal Communications Commission's Disaster Information Reporting System (DIRS). DIRS is currently activated for 32 affected counties in California. Note that the operational status of communications services during the power shutoffs may evolve rapidly, and this report represents a snapshot in time.

The following counties are in the current geographic area that is part of DIRS.

California: Alpine, Amador, Butte, Calaveras, Contra Costa, El Dorado, Glenn, Humboldt, Kern, Lake, Los Angeles, Marin, Napa, Nevada, Orange, Placer, Riverside, San Bernardino, San Diego, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Shasta, Sierra, Solano, Sonoma, Tehama, Tuolumne, Ventura, Yolo, and Yuba.



As prepared by the Federal Communications Commission: October 29, 2019 11:30 a.m. EDT

Ex. N_012

911 Services

The Public Safety and Homeland Security Bureau (PSHSB) learns the status of each Public Safety Answering Point (PSAP) through the filings of 911 Service Providers in DIRS, reporting to the FCC's Public Safety Support Center, coordination with state 911 Administrators and, if necessary, direct contact with individual PSAPs.

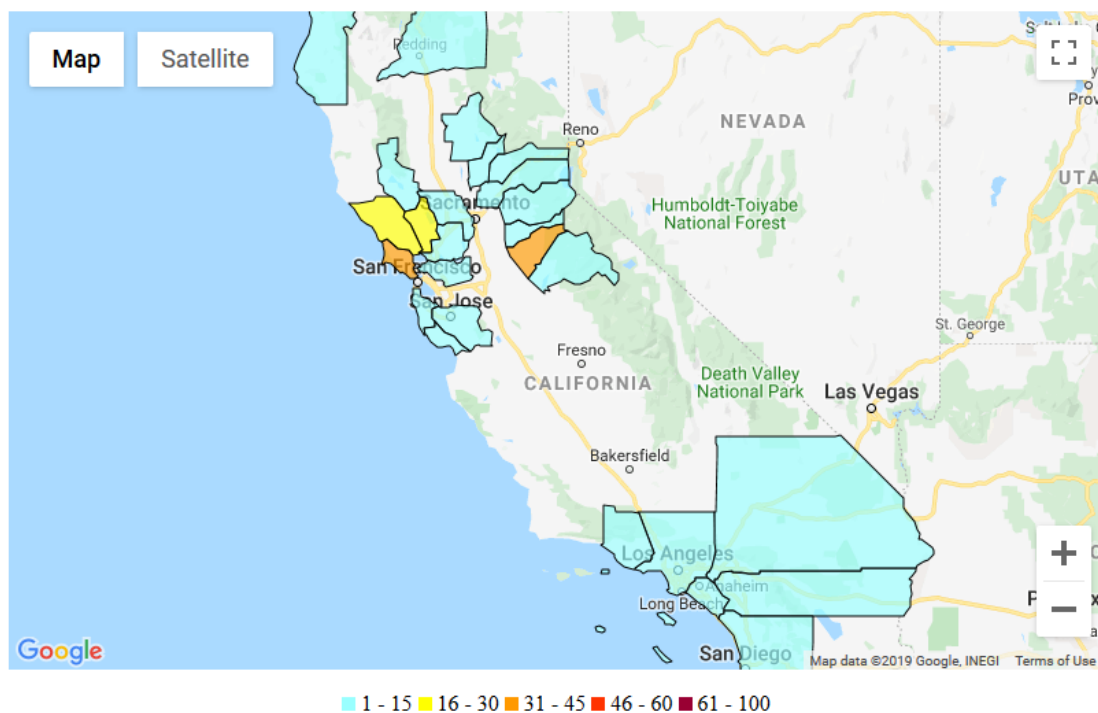
911 calls to Fairfax Police Department, CA have been rerouted to another PSAP with location information.

Wireless Services

The following section describes the status of wireless communications services and restoration in the affected area, including the percentage of cell sites out of service for each county.

Percent Cell Sites Out-of-Service By County

10/29/2019 11:10:33 AM



As prepared by the Federal Communications Commission: October 29, 2019 11:30 a.m. EDT

Ex. N_013

The following tables provide cell sites out of service by county. The information shown was provided by the signatories to the Wireless Network Resiliency Framework Cooperative Agreement.

California:

Cell sites out of service due to the power shutoffs: 1.8% (down from 3.3% yesterday)

Marin county has 35.4% (down from 57.1% yesterday) of its cell sites out of service.

State	Affected Counties	Cell Sites Served	Cell Sites Out	Percent Out	Cell Sites Out Due to Damage	Cell Sites Out Due to Transport ¹	Cell Sites Out Due to Power
CA	ALPINE	8	0	0.0%	0	0	0
CA	AMADOR	40	2	5.0%	0	0	2
CA	BUTTE	174	6	3.4%	0	1	5
CA	CALAVERAS	43	14	32.6%	1	0	11
CA	CONTRA COSTA	924	35	3.8%	1	3	31
CA	EL DORADO	258	17	6.6%	0	0	15
CA	GLENN	33	0	0.0%	0	0	0
CA	HUMBOLDT	188	2	1.1%	0	0	3
CA	KERN	601	0	0.0%	0	0	0
CA	LAKE	54	7	13.0%	0	0	7
CA	LOS ANGELES	7,067	13	0.2%	2	4	6
CA	MARIN	268	95	35.4%	6	1	83
CA	NAPA	128	20	15.6%	0	1	18
CA	NEVADA	123	9	7.3%	1	2	7
CA	ORANGE	3,003	4	0.1%	1	1	2
CA	PLACER	442	22	5.0%	0	4	18
CA	RIVERSIDE	1,772	2	0.1%	0	1	1
CA	SAN BERNARDINO	1,896	5	0.3%	2	1	0
CA	SAN DIEGO	3,978	8	0.2%	5	2	1
CA	SAN MATEO	830	29	3.5%	8	3	17
CA	SANTA BARBARA	340	0	0.0%	0	0	0

¹ These are cell sites that are out due to issues with the (typically wireline) networks that route communications traffic to and from the cell sites.

CA	SANTA CLARA	1,893	15	0.8%	3	1	12
CA	SANTA CRUZ	212	11	5.2%	2	2	8
CA	SHASTA	142	10	7.0%	0	2	8
CA	SIERRA	0	0	N/A	0	0	0
CA	SOLANO	340	29	8.5%	0	3	26
CA	SONOMA	424	95	22.4%	2	0	91
CA	TEHAMA	62	0	0.0%	0	0	0
CA	TUOLUMNE	36	2	5.6%	1	0	1
CA	VENTURA	582	1	0.2%	0	0	1
CA	YOLO	193	9	4.7%	1	5	3
CA	YUBA	66	1	1.5%	0	0	1
TOTAL		26,120	463	1.8%	36	37	378

The number of cell site outages in a specific area does not necessarily correspond to the availability of wireless service to consumers in that area. See Improving the Resiliency of Mobile Wireless Communications Networks, Order, 31 FCC Rcd 13745, para. 10 (2016) (recognizing the difficulties in accurately depicting the ongoing status of a wireless provider's service during emergencies). Wireless networks are often designed with numerous, overlapping cell sites that provide maximum capacity and continuity of service even when an individual site is inoperable. In addition, wireless providers frequently use temporary facilities such as cells-on-wheels (also known as COWs), increased power at operational sites, roaming agreements, or take other actions to maintain service to affected consumers during emergencies or other events that result in cell site outages.

Cable Systems and Wireline (Combined)

Cable and wireline companies reported 223,973 (down from 454,722 yesterday) subscribers out of service due to the power shutoffs; this may include the loss of telephone, television, and/or Internet services.

Broadcast

Television stations status:

17 (up from 14 yesterday) TV stations reported being operational.
(K40JV-D, KCAL-DT, KCBS-DT, KDTV-CD, KFMB-TV, KNBC, KNSD, KRCA, KSDX-LD, KSWB-TV, KTLA, KTXL, KUAN-LD, KUSI-TV, KUVS, KUVS-DT, KVEA)

No TV stations reported being out of service.

FM Radio stations status:

34 (up from 31 yesterday) FM radio stations reported being operational.
(K256DA, KAMP-FM, KBBL, KBUA, KBUE, KBZT, KCBS-FM, KDFC, KEBN, KFBK-FM, KFMB-FM, KFRB, KHYL, KISQ, KJZY, KKLJ, KKRO, KOSC, KPRI, KROQ-FM, KRQB, KRTH, KSON, KTWV, KVIP-FM, KVMR, KWFN, KWIZ, KWVE-FM, KWVF, KXSN, KYXY, KZFX, KZST)

21 (up from 4 yesterday) FM radio stations reported being out of service.
(K205BN, K221DQ, K225AU, K236AW, K238AF, K255CN, K264AL, K265CV, K270BE, K276EK, K290CJ, KAWJ, KCAI, KHAP, KLVY, KMVS, KNOB, KNVE, KPJP, KSXY, KYKL)

2 FM radio stations (same as yesterday) reported being out of service with programming sent to another station.
(KRSH, KXTS)

AM Radio stations status:

5 (up from 4 yesterday) AM radio station reported being operational.
(KECR, KFMB, KFRN, KNX, KVMR)

3 (up from 2 yesterday) AM radio stations reported being out of service.
(KIHG, KVIP, KYAA)

EXHIBIT O

COM/MBL/mph

Date of Issuance 2/18/2021

Decision 21-02-029 February 11, 2021

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking
Regarding Emergency Disaster Relief
Program.

Rulemaking 18-03-011

DECISION ADOPTING WIRELINE PROVIDER RESILIENCY STRATEGIES

R.18-03-011 COM/MBL/mph

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ORDER101

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- Identify network facilities that support critical facilities pursuant to Section 5.4.4 as well as communities without sufficient wireless coverage pursuant to Section 5.6.2.

2. The Commission's Communications Division shall develop reporting templates as well as a submittal schedule for the Communications Resiliency Plans within 60 days from the adoption of this decision.

3. The Commission's Communications Division shall publish a map of areas in the state within Tier 2 and 3 High Fire Threat Districts that do not have sufficient wireless coverage from one or fewer facilities-based wireless providers within 30 days from the adoption of this decision on the Commissions' website. Communications Division will serve this map, as a courtesy, to parties of the service list to Rulemaking 18-03-011

4. Facilities-based wireline providers shall, in their Communications Resiliency Plan pursuant to Section 5.6.2 of this decision, demonstrate their ability to: (a) meet the 72-hour backup power requirement, in Tier 2 and Tier 3 High Fire Threat Districts, consistent with Section 5.4.4, which adopts the 72-hour backup power requirement in Tier 2 and Tier 3 High Fire Threat Districts for the wireline providers operating in California; (b) meet the requirements of Section 5.4.4, which establishes that the 72 hours of backup power can be met with flexible procurement and deployment, and is a reasonable duration of time to fulfill the backup power requirement; and (c) meet the requirements of Section 5.4.6, which requires the wireline providers to ensure customers and first responders have access to minimum service levels and coverage including 9-1-1 service, 2-1-1, ability to receive alerts and notifications, and basic internet browsing during a disaster or commercial power outage, as well as describe their ability to maintain a minimum level of service and their long-term investment plan to comply with the 72-hour backup power requirement of this decision.

R.18-03-011 COM/MBL/mph

5. Facilities-based wireline providers shall file information only emergency operations plans pursuant to Section 5.9.2 of this decision, on an annual basis, with the first due within 60 days of the effective date of this decision to the Director of the Communications Division, this email address- serviceresiliency@cpuc.ca.gov, the California Governor's Office of Emergency Services, and local emergency response agencies, as an information only filing that contains the wireline provider's: (1) emergency operations plan; (2) emergency contact information; (3) emergency preparedness exercise attestation; and (4) public communications plans.

6. Rulemaking 18-03-011 remains open.

This order is effective today.

Dated February 11, 2021, at San Francisco, California.

MARYBEL BATJER

President

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

Commissioners

EXHIBIT P

Site Visits Report

Emergency Disaster Relief Program Years 2021, 2022 and 2023

NETWORK PERFORMANCE AND PUBLIC SAFETY

Communications Service Providers Network Resiliency Requirements in Tier 2 and 3 High Fire Threat Districts pursuant to Decisions (D.) 20-07-011 and (D.) 21-02-029

Prepared by: Communications Division

October 1, 2024



**California Public
Utilities Commission**

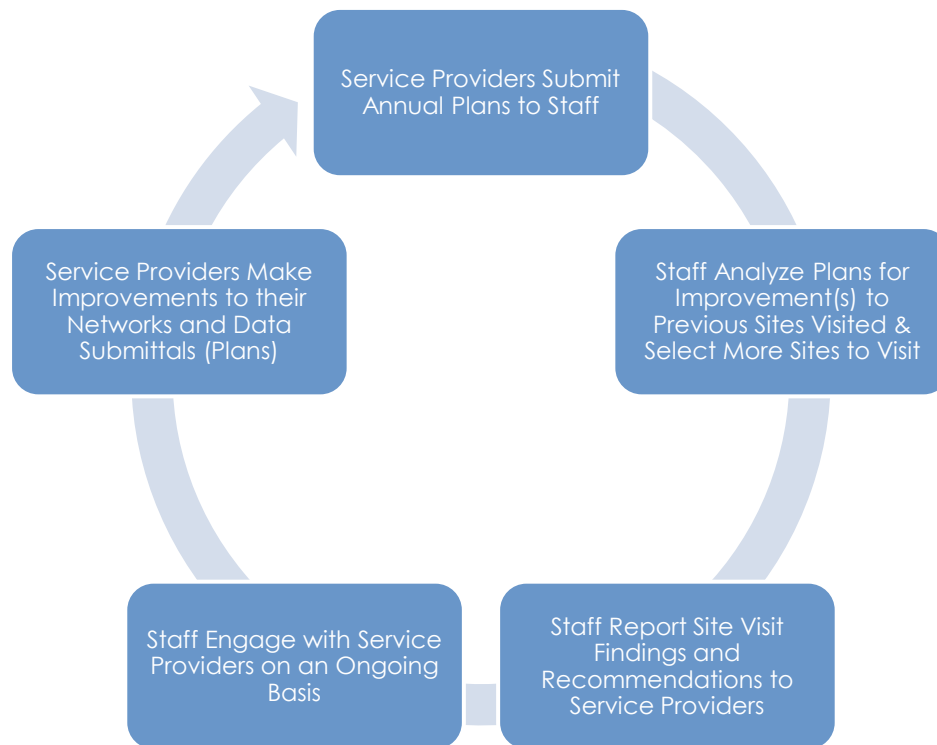
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2021, 2022, 2023 SITE VISITS REPORT

Figure 20: Cyclical Reinforcement Between Site Visits and Communications Resiliency Plans



Key Observations

An Overview of Service Providers Response to Site Visits

Service Providers largely accommodated Staff's requests to conduct virtual and physical site visits. Staff acknowledges the service providers' willingness to coordinate site access and meet Engineers at most of the sites the Engineers selected to visit. Most service providers were willing to review and sign Site Assessment Checklists and continued to work through findings and recommendations with Staff after site visits were conducted.

Nearly one-third of the wireless facilities in Tier 2 and 3 HFTD still lack sufficient backup power.³⁶ Wireless service providers reported in 2023 that 1,509 of their 5,388 facilities lacked 72 hours of backup power as compared to 276 of the 12,737 wireline facilities.³⁷

³⁶ This Report does not include data from 2024 annual Plans.

³⁷ Data from Communications Resiliency Plans submitted by service providers requested confidential treatment pursuant to G.O. 66-D. Summary of facilities can be found at [Communications Network Resiliency](#).

EXHIBIT Q

Resolution T-17789
CD/CJ1

Date of Issuance: June 24, 2024

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division
Carrier Oversight and Programs Branch

RESOLUTION T-17789
June 20, 2024

RESOLUTION

RESOLUTION T-17789 Denies AT&T California's (U-1001-C) Corrective Action Plan as proposed in Advice Letter 49420, Advice Letter 49420A, and Advice Letter 49420B for failing to meet the conditions set forth in Resolution T-17769.

I. SUMMARY

This resolution denies AT&T California's Corrective Action Plan (CAP) proposed in Advice Letters (AL) 49420, 49420A, and 49420B. On February 15, 2022, AT&T California (AT&T) submitted AL 49018, asking to suspend the General Order (GO) 133-D¹ fine of \$3,092,400 for failing to meet the *Out of Service Repair Interval* (OOS) standard in 2021. Instead of the fine, AT&T asked to invest \$6,184,800 in proposed service quality improvement projects pursuant to GO 133-D, Section 9.7. Resolution T-17769² approved the investment plan on the condition that AT&T submit a CAP as a Tier III AL explaining the actions that the company will take to correct the failure and improve the service quality performance to a level that meets adopted measures and standards. This Resolution finds that AT&T's CAP failed to satisfy these requirements. Therefore, the California Public Utilities Commission (Commission) denies the CAP.

II. BACKGROUND

Since 1972, the Commission has required public utility telephone corporations such as AT&T to provide service that meets minimum service quality standards.³ GO 133-C established a minimum set of service quality standards and measures for installation, maintenance, and operator services for local exchange telephone service in California.

¹ [General Order 133-D](#).

² [Resolution T-17769](#).

³ See Pub. Util. Code § 2896 ("The [C]ommission shall require telephone corporations to provide customer service to telecommunication customers that include, but are not limited to...(c) Reasonable statewide service quality standards, including but not limited to, standards regarding network technical quality, customer service, installation, repair, and billing. ..."); see also GO 133-D, § 1.1(a).
534539065

Resolution T-17789
CD/CJ1

6. The goal of the CAP was for AT&T to meet the GO 133-D OOS standard by the end of the two-year period.
7. On March 13, 2023, AT&T filed AL 49420 as a Tier 3 AL as directed in Ordering Paragraph 2 of Resolution T-17769
8. AT&T's OOS targets in the CAP fluctuate between 28% and 73% and do not meet the 90% OOS standard.
9. AT&T failed to submit quarterly update reports that were due on July 30, 2023, and October 30, 2023.
10. AT&T stated in AL 49420A and 49420B that it does not think the OOS metric is a valid indicator of service quality and is unwilling to invest in hiring and training the number of technicians it stated is needed to bring them into compliance with the OOS standard.
11. On January 12, 2024, the Commission emailed a draft of this Resolution to all parties on the general service list for public comments.

CONCLUSIONS OF LAW

1. It is reasonable for the Commission to deny AT&T's CAP submitted in ALs 49420, 49420A, and 49420B for failing to meet the conditions set forth in Resolution T-17769.
2. It is reasonable to refer the matter to the Executive Director.
3. This Resolution does not limit the Commission's ability to impose on AT&T's obligation to comply with other legal requirements, including but not limited to General Order 133-D or its successors, Public Utilities Code § 451 and 2107, Rule 1.1 of the Commission's Rules of Practice and Procedure, an Order Instituting Investigation or other enforcement actions.

Resolution T-17789
CD/CJ1

THEREFORE, IT IS ORDERED that:

1. The California Public Utilities Commission deny AT&T California's (U-1002-C) CAP in AL 49420, AL 49420A, and AL 49420B.
2. The Commission refers the matter to the Executive Director to take appropriate action as discussed herein.

California Public Utilities Commission
Fiscal Office
505 Van Ness Avenue, Room 3000
San Francisco, CA 94102

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the California Public Utilities Commission at its regular meeting on June 20, 2024. The following Commissioners approved it:

/s/RACHEL PETERSON

Rachel Peterson
Executive Director

ALICE REYNOLDS
President
DARCIE HOUCK
JOHN REYNOLDS
KAREN DOUGLAS
Commissioners

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