

FEB. 7 1992

Decision 92-02-032 February 5, 1992

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In the Matter of Alternative
Regulatory Framework for
Local Exchange Carriers.

ORIGINAL
I.87-11-033

(Filed November 25, 1987)

And Related Matters.

Application 85-01-034

Application 87-01-002

I.85-03-078

OII 84

Case 86-11-028

I.87-02-025

Case 87-07-024

(See Appendix A for list of appearances.)

**OPINION ON TURN'S REQUEST FOR
COMPENSATION ON PHASE III POLICY ISSUES**

I. Summary of Decision

Toward Utility Rate Normalization (TURN) requests compensation of \$57,313 for its contribution to Decision (D.) 91-07-044, which addressed the Policy Issues part of Phase III of this proceeding. In this decision, we find that TURN made a substantial contribution to D.91-07-044 regarding public notice, education, and due process, and we award compensation in the amount of \$48,230 plus interest for TURN's contribution.

II. Background

TURN filed its request for a finding of eligibility for compensation in this proceeding on February 26, 1988. In D.88-07-035, the Commission determined that TURN was eligible

under Article 18.7 of the Rules of Practice and Procedure (Rules) to claim compensation for its participation in this proceeding.

In D.91-11-070 the Commission awarded TURN compensation in the amount of \$55,527.17 for its substantial contribution to D.90-04-031, which modified D.89-10-031 (Phase II of this proceeding). TURN now seeks compensation for its work in Phase III of this proceeding.

III. TURN's Request for Compensation Was Filed Late

TURN tendered its current request for compensation on August 30, 1991, four days late, based on the 30-day window from the mailing date of D.91-07-044 on July 26, 1991 afforded by Rule 76.56. Accordingly, TURN attached a motion to accept its late-filed request to its request for compensation.

TURN's counsel states that he inadvertently miscalendared the filing deadline as August 30, 1991. He then points out that TURN's instant request deals with efforts leading to an interim decision, and asserts that under Rule 76.56 TURN could have awaited the issuance of the final order or decision at the conclusion of Phase III of this proceeding to request compensation.¹

Although the Commission will permit deviations from its rules for good cause (Rule 87), the time limits of Rule 76.56 are taken directly from Public Utilities Code § 1804(c), and the code contains no provision to allow waiver of the 30-day limit. Despite the lack of express legislative authorization, in this instance we feel justified in invoking the broad powers granted us in § 701, to

¹ TURN's motion does not address Rule 76.52(h), which defines "final order or decision" to mean "an order or decision that resolves the issue(s) for which compensation is sought." Although D.91-07-044 was designated as an interim opinion, it resolved the issues for which TURN seeks compensation.

do all things necessary and convenient in the exercise of our jurisdiction to supervise and regulate public utilities. We also note that no party in this proceeding was prejudiced by TURN's late filing of four days from the deadline. Accordingly, under the specific circumstances stated in TURN's motion, we will use our authority under § 701 to extend the 30-day limit of Rule 76.56 for four days to permit filing of TURN's request.

We do not wish to convey the impression that a party may disregard the deadlines established in our rules and in the statutes with impunity. In these circumstances, it is appropriate to reduce the compensation we would otherwise award TURN for preparation of its request for compensation by 20% (three hours) to approximate the time devoted by TURN's attorney to the preparation of the motion, which would have been avoided if TURN had timely filed its request. TURN's tardiness also caused additional staff time to be expended in reviewing the filing and for our consideration of its motion.

IV. TURN's Claim for Compensation

TURN argues that it contributed substantially² to the Commission's interim decision (D.91-07-044) regarding Phase III.

² "Substantial contribution" is defined in Rule 76.52(g) as follows:

"(g) Substantial contribution means that, in the judgment of the Commission, the customer's presentation has substantially assisted the Commission in the making of its order or decision because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer."

Policy Issues and a subsequent Assigned Commissioners' Ruling establishing the schedule for the remainder of Phase III.

Specifically, TURN described its contribution to D.91-07-044 as follows:

"1. Notice and Education

"Each of the decision's requirements regarding notice and education were proposed by TURN. Moreover, almost all of TURN's notice and education proposals were adopted by the Commission.

"First, the decision concurs with TURN regarding the need for public participation hearings. It further finds that TURN's list of 14 recommended locations for the PPH's should be used for reference to determine the actual PPH locations. (Mimeo. at p. 37).

"Second, the decision substantially follows TURN's recommendation regarding bill inserts, except that it finds that the fourth and fifth bill inserts advocated by TURN can be combined into one. (Mimeo. at p. 39). The required content of the bill inserts is consistent with the content recommended by TURN.

"Third, the decision completely adopts TURN's proposal regarding the information that the Les should be required to publish in their white pages directories. Contrary to the position urged by GTEC the decision agrees with TURN that the LECs should be required to publish the intraLATA carriers' access codes and additional information on how to use 10XXX dialing and how to contact alternative carriers. (Conclusion of Law 38). In addition, the decision rejects the position of all other parties and adopts TURN's proposal that all intraLATA carriers have an opportunity to list their intraLATA MTS rates alongside the LECs' rate listings. (Mimeo. at p. 42).

"Fourth, the decision finds as a fact:

*76. TURN's recommendation for PSAs [public service announcements] and customer outreach, including printed materials in foreign languages, where there is a significant population and demand for such information in a particular foreign language, is reasonable. (Mimeo. at pp. 65-66).

"The decision quotes extensively from the testimony of TURN's witness, Karen Miller, in adopting TURN's recommendations. (Mimeo. at pp. 43-44).

"Finally, the decision adopts TURN's recommendation for funding the notice and education program. As TURN advocated, the LECs are required to pay for the cost of the bill inserts they mail and their customer outreach activities. The IECs are required to pay for the cost of space they use in LECs' white pages directories." (TURN's Request for Compensation, pp. 2-4, footnote omitted.)

TURN also claims that it prevailed a "due process" issue. TURN asserts that, since the inception of Phase III, it has consistently argued that due process and Public Utilities Code § 1708 require the Commission to hold evidentiary hearings before making a final decision to authorize intraLATA competition. TURN contends that: "D.91-07-044 adopts the position advocated by TURN and commits the Commission to holding evidentiary hearings before reaching any conclusions regarding whether intraLATA competition is in the public interest."

In support of its assertions, TURN explained that:

"At several stages in the Phase III proceedings, there was considerable doubt as to whether such hearings were going to be held. For example, D.90-08-066 appeared to make those hearings contingent on parties making verified showings that specific material factual disputes needed to be resolved before intraLATA competition should be allowed. TURN responded that it was legally improper to make parties justify the need for hearings required by statute and by

due process. TURN also showed, by declaration of Karen Miller, that there was a substantial factual issue as to the effect of intraLATA competition on basic exchange rates, which was a primary reason for the Commission's rejection of expanded competition in D.84-06-113." (Footnote omitted.)

TURN also took issue with a November 28, 1990 Assigned Commissioner's Ruling which suggested that the Commission intended to open the LATAs to competition on or about January 1, 1992. At prehearing conferences in December 1990 and January 1991, TURN argued against opening the LATAs to competition prematurely. TURN then cited pages 52 and 53 (mimeo.) of D.91-07-044, which addressed one of TURN's often argued points, that opening the LATAs to competition would likely be an irreversible action.

TURN asserts that it repeatedly urged the Commission not to follow the path to competition through the incorporated findings in the proposed decision (D.90-08-066) since there existed no evidentiary record to support such an order. Thus, TURN claims substantial credit for the interim order, D.91-07-044, which commits the Commission to hold evidentiary hearings before any conclusion is reached as to whether intraLATA competition is in the public interest. TURN also claims credit for persuading the Commission to maintain a unified, rather than bifurcated, schedule for the balance of Phase III of this proceeding, and maintains that its effort led the Commission to conclude that a unified proceeding would best protect the parties' due process rights.

V. Duplication

TURN contends that it met the requirement of Rule 76.53(c)³ and in seeking compensation as an intervenor it did not materially duplicate the presentation and contribution of any other party.

As to its proposals for public notice and education, TURN concedes that there were some points on which its proposals and those of the Division of Ratepayer Advocates (DRA) overlapped. There were also significant points of disagreement between TURN and DRA. On these points TURN claims that the Commission adopted TURN's recommendation. The most notable differences were on issues of rate comparisons to be published in the local exchange companies' directories, and funding of public notice and education. DRA opposed the inclusion of rate comparisons in directories and proposed a new surcharge to cover the costs of notice and education.

TURN correctly points out that the Commission opted for TURN's recommendation on rate comparisons and adopted a simple approach on cost recovery of expenses for public notice and education, which did not entail the adoption of another new local exchange telephone company surcharge to be used exclusively for public notice and education.

3 Rule 76.53(c) states:

- "(c) The customer's presentation does not materially duplicate the contribution or presentation of any other party to the proceeding. If in the Commission's opinion there is such duplication, any compensation to which the customer would otherwise be entitled may be reduced in proportion to the amount of duplication of effort. Customers are encouraged to file requests as soon as possible in the progress of the proceeding."

On due process issues TURN claims that its position was unique and important because it focused on basic service rate increases as the major underlying issue. This is the same issue which led the Commission to decide not to open the LATAs to competition in the past (1984). Thus, TURN argues, "While other parties also raised the due process issue, no other party, including the DRA, did so from the perspective of the potential impact on basic exchange rates."

VI. Discussion of TURN's Contribution

D.91-07-044 basically adopted DRA's "Four-Element Program" involving Public Participation Hearings, Bill Inserts, White Pages Directory Information, and Customer Outreach to provide public notice and information on the new regulatory framework (NRP). TURN's witness, Miller, focused her testimony on these same areas and assisted the Commission in its consideration and adoption of variations from DRA's proposal which effectively kept costs down for the local exchange carriers (LECs). In addition, the Commission clearly adopted TURN's recommendation for White Pages Directory Information on rate comparisons for interexchange carriers (IECs) and LEC toll rates, which DRA had opposed.

While a careful review of D.91-07-044's discussion of noticing methods and information to customers will reveal significant variations from both DRA's and TURN's proposals, it is clear that TURN's recommendations were important underpinnings of the Commission's determinations discussed at pages 35 through 46 (mimeo.) of D.91-07-044.

The issue of due process is another matter entirely. Many of the parties voiced opposition to a bifurcated proceeding. Conversely, support for interim rate realignment coupled with an earlier date for introduction of intralATA competition was almost exclusively advanced by the IECs who would then compete with the

LECs for the intraLATA services. Accordingly, TURN was one of numerous parties advancing the due process issues.

Nonetheless, TURN effectively focused the issue on potential increases in rates for basic residential customers, and especially low-income residential customers and small users of intraLATA message toll services.

Since these groups in aggregate may well represent about one-half of all residential ratepayers, TURN's contribution is worthy of some compensation even though its contributions to the argument on this issue were duplicative of other parties who were equally vocal in their opposition to interim decisions and any bifurcated proceedings leading to those decisions. Accordingly, we will adjust the time spent by TURN on the due process issue by 50%.

VII. TURN's Itemized Services and Expenditures

A. Claimed Amount

TURN's August 30, 1991 request for compensation aggregates 229.25 hours of attorney time at \$175 per hour, 127.5 hours of expert witness time at \$110 per hour, and photocopy, postage, and phone expenses of \$1,310, for a total of \$55,454.

Since the Commission by D.91-07-001 had disallowed compensation for time spent in preparing requests for compensation, TURN in its August 30, 1991 request did not include approximately 14.75 hours of attorney time expended in preparing its claim. However, by D.91-11-030, the Commission modified D.91-07-001 to state that, "notwithstanding our belief that the award of 'fees on fees' may be unnecessary and inappropriate as a matter of policy, we will continue to consider reasonable fee requests for services relating to the preparation of eligibility and compensation filings." In response to D.91-11-030, TURN, on November 22, 1991, amended its August 30, 1991 request to include an additional 14.75

hours for preparation of its request for compensation plus 1.25 hours for preparation of the amendment.

In its amendment, TURN also reduced the rate for work performed during 1990 by its attorney, Thomas J. Long, from \$175 to \$160 per hour, consistent with amounts awarded for similar work of that attorney for other calendar year 1990 work. By these changes, TURN revised upward its claimed amount by \$1,859 for a new total of \$57,313.

B. Hourly Rates

1. TURN seeks an hourly rate of \$160 for its attorney, Thomas J. Long, for work performed during the 1990 calendar year and a \$175 hourly rate for work performed during 1991.

In support of the \$160 hourly rate for 1990, TURN asserts the Commission has already found the \$160 hourly rate to be reasonable for Long's work performed in 1990. According to TURN, D.91-07-048 awarded an \$160 hourly rate for Long's "work performed in the Fall of 1990."

TURN seeks a \$15 hourly rate increase to \$175 in 1991 to set Long's hourly rate at a level closer to the market rate for an attorney with comparable training and experience. In support of the hourly rate increase, TURN attached a declaration from Long summarizing his training and experience, a declaration from the law firm Long previously worked for, and a survey of attorney billing rates from the June 4, 1990 edition of Of Counsel magazine.

Long graduated from the New York University School of Law in 1985. Upon graduation, he served a one-year clerkship with a United States District Court judge and became a member of the California Bar in 1986. In October 1986, he joined the litigation department of Morrison & Foerster as an associate. In 1987 and 1988, he devoted a substantial portion of his time to "pro bono" work. Long assumed his present position with TURN in October 1990.

According to the declaration of Richard G. Seeborg, a partner in the law firm of Morrison & Foerster, had Long continued

to work for Morrison & Foerster in the fall of 1990, the firm would have billed clients for his services at a rate in excess of \$175 per hour.

TURN also attached a survey from the June 4, 1990 edition of Of Counsel magazine to demonstrate that the hourly billing rates for the "High Associate" category of the San Francisco law firms surveyed range from a low of \$175 to a high of \$215. Therefore, TURN asserts that the \$175 hourly rate for work performed by Long in 1991 is at the low end of the range of market rates for attorneys of Long's training and experience and should be approved.

As stated by TURN, we have resolved Long's 1990 hourly rate in D.91-07-048. Therefore, it should not be necessary to revisit it in this proceeding. However, a review of D.91-07-048 and TURN's related compensation request discloses an inconsistency between TURN's showing leading to D.91-07-048 and its showing in this proceeding.

In the showing leading to D.91-07-048, TURN provided an almost identical declaration from Long, and exact copies of a declaration from Seeborg and survey of billing rates from the June 4, 1990 edition of Of Counsel magazine to support the \$160 hourly rate requested by TURN for Long.

In its current showing, TURN did not provide any new evidence to substantiate that Long should be awarded a \$15 hourly wage increase for his 1991 work. Long began his second year with TURN in October 1991. If we were to authorize a pay increase, we would be inclined to do so after the first full year of service. More importantly, TURN failed to disclose in its current compensation request that D.91-07-048 continued an \$160 hourly rate for work performed by Long in 1991. Consistent with D.91-07-048, we will apply a \$160 hourly rate to Long's 1990 and 1991 hours associated with TURN's substantial contribution to this proceeding. We will re-examine a \$175 rate for work Long performs in calendar year 1992. We are persuaded that the \$160 rate adopted herein

approximates the market value for attorneys of comparable training and experience.

Therefore, TURN's request for an award enhancement is without merit and should be denied. From Long's detailed time accounting set forth on these pages of Appendix A, we determined that Long devoted about 63 hours to the due process and bifurcation issues, of which we will approve 31.5 hours (50%), thus reducing the total of 245.25 claimed hours for Long to 210.75, after deducting three hours for the expended by Long on the motion to accept TURN's late-filed compensation request.

2. TURN requests a rate of \$110 per hour for 127.5 hours of work of its expert witness, Karen Miller, in this proceeding. TURN again provided a detailed breakdown⁴ of these hours. TURN correctly states that the Commission has recently approved the \$110 per hour rate for Miller's work as a witness and telecommunications analyst in D.91-07-048.

On September 27, 1991 GTE California Incorporated (GTEC) filed a timely response to TURN's August 30, 1991 request for compensation. GTEC specifically singles out the work of Miller, which it contends is billed at a rate in excess of any amount Miller is likely to earn as an employee of TURN. Specifically, GTEC argues:

"At \$110 an hour, assuming a 40 hour work week over the course of 52 weeks, Ms. Miller's annual compensation would near \$230,000. It is doubtful that Ms. Miller earns anywhere near that amount as an analyst with TURN, which is a public interest organization. One would expect some correlation between the amount TURN requests from the Commission for compensation of Ms. Miller on an ongoing basis for her services rendered to TURN. Unfortunately, there appears to be no such correlation.

⁴ See Appendix B to TURN's Request for Compensation, August 30, 1991.

"TURN also has failed to provide any meaningful substantiation for Ms. Miller's requested hourly rate of \$110. As far as we know, Ms. Miller is not an attorney, she holds no advanced degrees in telephony-related subject areas, and has never served as a private consultant whose services would be available in the marketplace. In sum, TURN wants the Commission to compensate TURN for Ms. Miller's time as if Ms. Miller were a renowned telecommunications consultant engaged in a highly successful private practice. TURN has failed entirely to meet its burden of establishing the legitimacy of Ms. Miller's hourly rate." (GTEC's response, p. 2.)

In response to TURN's statement that the Commission previously approved the \$110 per hour rate for Miller's work in D.91-07-048, GTEC argues that: "AT&T's failure to challenge Ms. Miller's excessive hourly rate should not preclude the parties from challenging Ms. Miller's hourly rate in the instant proceeding."

Lastly, GTEC contends that: "It is inconceivable that it would take 59 hours to draft 25 pages of testimony. A reasonable amount of time required..." should be closer to 20 hours.

On October 15, 1991, TURN replied to GTEC's protest of its claim for compensation stating that:

"Public Utilities Code Section 1806 and Commission Rule of Practice and Procedure 76.60 are clear that compensation rates are to be set by reference to the 'market value of services paid by the Commission or the public utility, whichever is greater.' Intervenor compensation rates are not, as GTEC has unsuccessfully argued for some time, based on employee salaries. TURN particularly objects to GTEC's suggestion that services of TURN employees should be worth less because TURN is a public interest organization that does not have the same resources as the utilities."

TURN also takes issue with GTEC's contention that Miller spent too much time preparing her testimony. TURN asserts that:

"Much more is involved in preparing testimony than just drafting the document." Preparation of the testimony involved research on the various points, organizing the points, and preparing the attachments to the testimony, and the revisions to improve the early drafts.

TURN then appended excerpts from its April 22, 1991 compensation request in Application 90-02-060 and accompanying declarations to its reply to GTEC. These appendices included a declaration of Miller and Terry L. Murray addressing the educational background and the professional expertise of Miller. Murray opines that given Miller's knowledge and experience, \$110 is a reasonable billing rate for her services.

We conclude that Miller's work as an expert witness in this proceeding was of excellent quality and effectively and professionally delivered. However, her work on the due process issue, we believe, was duplicative of other work. Accordingly, we will disallow 7.50 hours (50% of 15 hours) devoted by Miller to the due process issue. For the balance of the 120 hours devoted by Miller to this proceeding, we will approve the requested \$110 per hour consistent with the rate previously authorized in D.91-07-048.

C. Other Costs

Rule 76.52(c) defines "other reasonable costs" as "reasonable out-of-pocket expenses incurred by a customer not exceeding 25% of the total reasonable advocate's fees and expert witness fees awarded." TURN seeks \$1,310 for copying, postage, and telephone expenses it incurred directly. This cost is reasonable and will be adopted.

VIII. Recomputation of Reasonable Compensation

The resulting adjusted compensation for TURN in the Policy Issues part of Phase III of I.87-11-033 is as follows:

<u>Work Activity or Expense</u>	<u>Amount</u>
Thomas J. Long, 210.75 hours (representing 245.25 claimed - 34.5 disallowed) for the period of 10/1/90 through 7/10/91 @ \$160	= \$33,720
Karen L. Miller, 120 hours (representing 127.5 claimed - 7.5 disallowed) for the period of 10/1/90 through 7/10/91 @ \$110	= 13,200
Copying	= 964
Postage	= 329
Telephone	= 17
Total	\$48,230

Consistent with our treatment of TURN's earlier compensation request in Phase II of this proceeding, we apportion the responsibility for paying this award equally between Pacific Bell and GTEC.

IX. Conclusion

We conclude that TURN's "Request for Compensation" on Policy Issues in Phase III of I.87-11-033, as modified and recomputed above, is reasonable.

TURN is, therefore, entitled to supplementary compensation in I.87-11-033 in the amount of \$48,230.

Consistent with prior decisions, this order will also provide for interest computed at the three-month commercial paper rate to accrue commencing on November 13, 1991, on this award of \$48,230, continuing until full payment of the award is made. This date represents the 75th day after the filing of TURN for compensation for its contributions to D.91-07-044.

This order should be made effective today to assure prompt receipt of this compensation award.

TURN is placed on notice it may be subject to audit or review by the Commission Advisory and Compliance Division. Therefore, adequate accounting records and other necessary documentation must be maintained and retained by the organization in support of all claims for intervenor compensation. Such recordkeeping systems should identify specific issues for which compensation is being requested, such as the actual time spent by each employee, the hourly rate paid, fees paid to consultants, and other costs for which compensation may be claimed.

Findings of Fact

1. TURN has requested compensation totaling \$57,313 plus interest for its contribution to D.91-07-044.

2. TURN was found eligible for compensation in D.88-07-035 for its participation in these proceedings.

3. TURN filed its request for compensation four days late due to an inadvertent calendaring error by its attorney.

4. No party will be prejudiced by our allowing TURN an extension of four days of the period in which to file its request for compensation.

5. TURN's tardiness nonetheless necessitated a motion to accept its late-filed request for compensation.

6. TURN made a substantial contribution to D.91-07-044 on the major issues involving public notice, education, and due process.

7. TURN's request for an increase of 9.4%, or an hourly fee of \$175 for its attorney's work in this proceeding during 1991 is not reasonable based on his short tenure at TURN at the time the work was performed.

8. An hourly rate of \$160 for TURN's attorney's work in this proceeding, based on a similar rate heretofore approved by this Commission in D.91-07-048, is and continues to be reasonable.

9. TURN's requested hourly rate of \$110 for its expert witness is consistent with a similar rate for her services previously approved by this Commission in D.91-07-048.

10. TURN's presentation and recommendations in the areas of public notice and education did not materially duplicate the presentations of other parties to this proceeding.

11. TURN's presentation and recommendations in the areas of due process and bifurcation were consistent with and partially duplicative of those of numerous other parties to this proceeding.

12. GTEC's challenge of the hourly rate and time spent on exhibits and testimony by TURN's expert witness is not convincing based on the professional quality of the expert's work.

Conclusions of Law

1. TURN's motion to accept its late-filed request for compensation should be granted.

2. TURN should not be compensated for any effort expended by its attorney to cure the late filing of the request for compensation.

3. TURN's presentation and recommendations in the areas of public notice and education did not materially duplicate the presentations of other parties.

4. TURN's presentation and recommendations in the area of due process were sufficiently duplicative of those of other parties to this proceeding to warrant a 50% reduction in time spent on those issues as provided pursuant to Rule 76.53(c).

5. An hourly rate of \$160 for TURN's attorney's participation in this proceeding is reasonable and should be approved.

6. The requested hourly rate of \$110 for TURN's expert witness' participation in this proceeding is reasonable and should be approved.

7. TURN's request for \$1,310 to cover photocopying, postage, and telephone expenses for this proceeding is reasonable and should be granted.

8. TURN is entitled to compensation of \$48,230 for its substantial contribution to D.91-07-044.

9. Pacific Bell and GTEC should each contribute \$24,115 plus interest computed at the three-month commercial paper rate from November 13, 1991 until full payment is made to TURN pursuant to this order.

10. This order should be made effective today to assure prompt receipt of TURN's compensation award.

O R D E R

IT IS ORDERED that:

1. Toward Utility Rate Normalization's (TURN) request for leave to file its request for intervenor compensation four days late is granted, and TURN's request for compensation is accepted for filing.

2. TURN's request for compensation for its contribution to D.91-07-044 is granted in the amount of \$48,230.

3. Pacific Bell and GTE California Incorporated shall, within 30 days of the effective date of this order, each remit to TURN \$24,115 plus interest calculated at the three-month commercial paper rate from November 13, 1991 until full payment is made.

This order is effective today.

Dated February 5, 1992, at San Francisco, California.

DANIEL Wm. FESSLER
President
JOHN B. OHANIAN
PATRICIA M. ECKERT
NORMAN D. SHUMWAY
Commissioners

I CERTIFY THAT THIS DECISION
WAS APPROVED BY THE ABOVE
COMMISSIONERS TODAY


NEAL J. SHULMAN, Executive Director

LIST OF APPEARANCES

APPENDIX A

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MASTER LIST (ALJ AMAROLI)

I.87-11-033 - (PHASE III)
85-01-034/A.87-01-002/
85-03-078/OII.84/C.86-11-028
I.87-02-025/C.87-07-024

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