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Decision 96-10-076 October 25, 1996

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ORIGINAL

Order Instituting Rulemaking on the Commission's Own Motion into Competition for Local Exchange Service (Filed April 26, 1995)

Order Instituting Investigation on the Commission's Own Motion into Competition for Local Exchange Service (Filed April 26, 1995)

OPINION

By this decision, I will grant the pending Petition to Modify Decision (D.95-07-054 and D.96-02-072) filed by the California Telecommunications Coalition (Coalition) on April 3, 1996.

I. Background

In D.95-07-054, the Commission adopted initial interim rules for the provision of local exchange service by competitive local carriers (CLCs). Among other things, D.95-07-054 required CLCs to provide the requisite confirmation letter "in a language other than English if the sale was made in another language."

(Appendix B, Rule 2.) In D.96-02-072, the Commission expanded the

The Commission first adopted the expanded requirement in Appendix C, Initial Rules for Local Exchange Service Competition in California, Entry, Certification and Regulation of 1. The members of the Coalition that joined in the petition to Modify are AT&T Communications of California (AT&T), California Association of Long Distance Telephone Companies (ICG Access Services) (ICG), MCI Telecommunications Corp. (MCI), Sprint Communications Co., L.P. (Sprint), Teleport Communications Group (TCG), and Time Warner Axes of California (TW). Toward Ulfly Rate Normalization (TURN) did not join the Coalition in that pleading.

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multilingual requirements for CLCs.² Specifically, CLCs were required to provide a confirmation letter to the customer in the language in which the sale was made, explaining the services ordered and the resulting charges. CLCs were also obligated to provide, on an ongoing basis, all billing and notices in the language in which the customer's order was initially taken.

(D.96-02-072, mimeo Appendix E, p. 10, Rule 4(F)(16)) The discussion of this requirement at p. 80 of D.95-12-056, mimeo, states that billing and future notices must be in the language in which the service was sold for as long as the person remains a customer.

The decision states:

"CLCs shall inform each new customer, in writing and in the language in which the sale was made, of the availability, terms, and statewide rates of Universal Lifeline Telephone Service and basic service. CLCs shall also provide bills, notices, and access to bilingual customer service representatives in the languages in which prior sales were made."

On April 3, 1996, the Coalition filed a Petition to Modify D.95-07-054 and D.96-02-072.

The Coalition requested that the Commission remove the requirement that CLCs maintain all customer contacts within a specific language once a CLC takes a service order in a language other than English if the sale was made in another language.

2 The Commission first adopted the expanded requirement in D.95-12-056, Appendix C, Initial Rules for Local Exchange Service Competition in California, Entry, Certification and Regulation of CLCs, 4(F)(16) at p. 12. However, D.96-02-072, Appendix E, Initial Rules for Local Exchange Service Competition in California, amended and replaced the earlier rules adopted in Appendix C of D.95-12-056. For this reason, the Petition only seeks modification of D.95-07-054 and D.96-02-072, not D.95-12-056. D.95-12-056 does not need to be modified in order for the requested modification to be implemented.

other than English. The Coalition claims that this requirement is counterproductive to the Commission's intent because it will have unintended negative consequences for California's non-English speaking population. Moreover, the Coalition claims the provisions are literally impossible to follow, burdensome and unfair to the extent that they are not applied equally to incumbent local exchange carriers (LECs) existing territories. On May 13, 1996, Public Advocates, Inc. (PA) filed an opposition in the Coalition's Petition to Modify, claiming that neither the petition nor the record give evidence of any reason to modify these provisions. PA notes that the Coalition's Phase I comments filed in October 1995, did not raise any of the objections

The Coalition further proposed that the Commission

3. Public Advocates, Inc. filed the opposition on behalf of the following intervenors:

- Southern Christian Leadership Conference
- National Council of La Raza
- Korean Youth and Community Center
- Filipinos for Affirmative Action
- Filipino Civil Rights Advocates
- Association of Mexican-American Educators
- California Association for Asian-Pacific Bilingual Education
- California Association for Bilingual Education
- California Rural Indian Health Board
- Chicano Federation of San Diego County
- Council for the Spanish Speaking
- El Proyecto Del Barrio
- Escuela De La Raza Unida
- Foundation Center for Phenomenological Research
- Hermandad Mexicana Nacional
- Korean Community Center of the East Bay
- Lawyers' Committee for Civil Rights of the San Francisco Bay Area
- Motivating Adolescents to Succeed
- Mountain View Community Health Center
- Multicultural Area Health Education Center
- Spanish Speaking Citizen's Foundation
- Spanish Speaking Unity Council

they now cite as problems. PA states that the Coalition's members have already informed the Commission pursuant to the requirements of D.95-12-057 that they could and would comply with the very provisions they now seek to modify. (D.95-12-057 at 23-24, ¶¶ 1-2) page

On May 21, the Coalition filed a third-round response to PA's opposition. The Coalition revised its prior position to propose that the Commission adopt an industry-standardized notice to explain the rates, terms and conditions of the ULTS or Lifeline program, to be prepared in the same non-English languages used by Pacific Bell (Pacific) in its 1996 annual Lifeline notice. Both CLCs and LECs would be required to include this notice with the required fulfillment package or confirmation letter that is sent to all residential customers.

The Coalition further proposed that the Commission convene a workshop to address the issue of multilingual outreach. The workshop would explore what the proper outreach goals are, whether there are areas of agreement between the parties on this issue, and if so, what the areas of agreement and disagreement are. The Coalition envisioned that the workshop might also be used to clarify exactly how CLCs can meet the requirements of Rule 2 of D.95-07-054 and Rule 4 (F) (16) of D.96-02-072.

We issued interim D.96-08-027 on August 2, 1996 concluding that the Coalition's Petition to Modify raised legitimate questions concerning whether our adopted rules will have the unintended effect of creating disincentives for CLCs to market their services to non-English speaking customers, thereby frustrating our goal of competitive choice for all Californians. Yet we deferred a final decision on the petition to modify pending a workshop to develop a further record on the issues raised by the parties. Accordingly, the assigned ALJ scheduled a workshop to provide input on the following four issues:

to clarify the operational and economic constraints on both LECs and CLCs, ability to comply with the multilingual billing and notice requirements under existing rules and to identify reasons, if any, for having different rules for LECs as opposed to CLCs

b. to clarify possible alternative means for both CLCs and LECs to meet the intent of the requirements of Rule 2 of D.95-07-054 and Rule 4 (F) (16) of D.96-02-072.

c. to identify areas of agreement, if any, among the parties as to bilingual customer communication requirements applicable to all carriers.

d. to develop a standardized industry document to inform non-English-speaking customers about lifeline services.

II. Positions of the Parties Prior to the Workshop Agreement

Coalition and CLCs
The Coalition petitioned for modification of the referenced decisions claiming that compliance with existing multilingual rules will be impossible for CLCs who cannot bill their customers in non-English languages. The Coalition argues that any such capability would take a substantial amount of time and effort to develop and would impose significant and unnecessary costs on the CLCs. For the same reasons, the Coalition denies that the CLCs can meet the requirement that the confirmation letter be in the language in which the sale was made. This rule would require a unique translation for each service order that is taken in a language other than English. The Coalition claims it would be

4 The Coalition states there are over 100 languages spoken in the Los Angeles school district alone, and that it is unreasonable to expect that CLCs can send bills in over 100 languages.

incredibly burdensome and expensive to perform unique translations in numerous non-English languages.⁴ Further, the existing Rule requires that all future notices be in the language in which the sale was made. This would require the CLC to track for each customer the language in which the service was ordered to ensure that all future correspondence with that particular customer will be in that language. The Coalition claims CLCs will not be able to sell their services in many different languages because their databases are not capable of tracking the language in which each customer service order was taken, nor could such a system be developed without incurring significant costs.

Public Advocates

PA disputed the claim that CLCs cannot provide a confirmation letter simply setting forth a brief description of the services ordered and itemizing all charges which will appear on the customer's bill. While the Coalition draws this conclusion from the claim that its members cannot bill their customers in non-English languages, PA questions what relevance a billing system has to the ability to write a confirmation letter. Such a confirmation letter, petitioner further suggests, requires a "unique translation for each service order." (Id. at 4.) Yet, PA claims that the charges for each service are generic, established by tariff, and the description of any particular service is generic. Only the combination of services ordered might be "unique" to subsets of customers, but this in no way requires a unique translation for each service order according to PA.

requires a unique translation for each service order that is taken in a language other than English. The Coalition claims it would be

⁴ The Coalition states there are over 100 languages spoken in the Los Angeles school district alone, and that it is unreasonable to expect that CLCs can send bills in over 100 languages.

PA disputes the Coalition's claim that CLCs are incapable of tracking the language in which each customer service was taken (Id. at 4.) Since the CLC is capable of tracking each customer's name, telephone number, billing address, and other information, PA questions why the CLC should be incapable of tracking the language in which the order was placed.

PA attached certain documentation to its opposition in support of its claim that at least certain major CLCs can provide bills in other languages, can track customers' languages, and can provide confirmation letters in different languages.

PA conducted discovery on the bilingual services issues, and informed the Commission that several major companies have no plans at all for providing bilingual services under local competition, and the rest had very few documents relating to the company's ability to provide bilingual services, bills and other notices and information about lifeline rates to limited English-speaking communities. PA cited past decisions of the Commission and statutes of the Legislature which require multilingual service, and presented evidence that providing such services has worked successfully in other areas such as education, voting, and health care. PA argues that this information formed the basis for the Commission's rules on the multilingual requirements at issue.

III. Results of the Workshop and Terms of the Multi-Party Agreement

The workshop ordered in D796-08-027 was held on August 27, 1996. A workshop report was issued for comments pursuant to ALJ ruling on September 13, 1996. Comments on the workshop report were received on September 27, 1996.

Workshop participants reached general consensus on CLCs and LECs inability to satisfy existing requirements for multilingual marketing. Parties agreed that there is a clear-cut difference between providing multilingual bills and providing multilingual information to customers about services, service

orders and terms and conditions of those services. While parties agreed that preparing customer notices in certain languages may be feasible, customer billing presented much more difficult constraints. Because of hardware capability limitations, even Pacific and GTEC are currently unable to print bills in non-English languages other than Spanish.

The workshop discussions were instrumental in leading to an agreement between PA and the Coalition regarding compromise measures to address multilingual requirements. In a letter to the assigned ALJ dated September 9, 1996, counsels for PA and MCI conveyed the terms of the agreement which was supported by AT&T, MCI, CCTA, ICG, TCG, Time Warner, and the 23 intervenors represented by PA. The proposed agreement is set forth in Appendix A of this decision.

IV. Positions of the Parties as a Result of the Agreement

Coalition and Public Advocates

The sponsoring members of the Coalition and Public Advocates support adoption of the Appendix A agreement. They argue this proposal addresses the Commission's concern that companies be able to provide outreach to non-English speaking and limited-English speaking Californians, while not constraining a CLC's ability to do so with unduly burdensome regulation. The proposal is also one that CLCs (at least those who commented) can implement immediately. Moreover, the proposed rule allows CLCs with differing marketing plans to apply the multilingual requirements to fit their individual market entry plans.

The Coalition states that the LECs do not have the same multilingual obligations and requirements as the Commission imposed on CLCs. While some LECs offer multilingual outreach in varying capacities, the LECs' multilingual outreach is not nearly as extensive as what is required of CLCs. In addition, with the exception of some limited Commission required notices, the LECs' multilingual

programs are not the result of a specific set of rules or services requirements. Consequently, the Coalition contends that the LECs can discontinue any aspect of their program at any time. The CLCs, on the other hand, cannot disregard the Commission's multilingual rules.

The Coalition believes there should be no difference between the Commission's multilingual rules for LECs and CLCs and that unequal multilingual requirements could create competitive advantages for the LECs by imposing higher costs on CLCs or by effectively preventing CLCs sales in languages other than English.

If, however, procedural or other considerations would prevent the Commission from acting expeditiously to modify the current rules in place for LECs, the Coalition proposes that the Commission consider the appropriate multilingual rules of incumbent LECs in a separate proceeding. The CLCs place higher priority on immediate relief from the multilingual rules currently in place than on the need for parity. Consequently, even though the Coalition believes that parity is appropriate, they believe that it is more important to relieve CLCs of requirements that they cannot meet. In short, they support the granting the requested relief as soon as possible and to oppose delay for any reason, including parity.

Incumbent Local Exchange Carriers

Pacific

Pacific believes that a Commission mandate may not be in alignment with the laudable intent to provide California's diverse ethnic community with more choices for their telecommunications needs. Pacific is not currently capable of immediate compliance with all of the requirements for the notifications and billing directed in D.95-07-054, D.96-02-072, or the proposed Bilingual Customer Notification and Billing Rule in Appendix A of the workshop report. Pacific feels that even though it is not capable of providing all notices and billings in the languages of customers

it serves, multilingual customers are better served than if Pacific served them solely in English. While Pacific is already in compliance with many of the proposed requirements in Appendix A, some provisions would require additional time and resources to achieve compliance. As an example, Pacific does not currently have the capability to comply with provision 1C of the proposed Notification and Billing Rule in Appendix A.

UPON INITIATION OF LOCAL SERVICE, SEND THE CONFIRMATION LETTER TO THE CUSTOMER IN THE PREFERRED LANGUAGE, SETTING FORTH A BRIEF EXPLANATION OF THE SERVICES ORDERED AND ITEMIZING ALL CHARGES WHICH WILL APPEAR ON THE CUSTOMER'S BILL.

The technology and equipment used to provide bills and the confirmation letter are the same. Consequently, as with its billing capability, Pacific can presently only generate a mechanized confirmation letter in English and Spanish. Pacific urges, therefore, that this rule not be adopted.

Pacific suggests a minor change in the wording of 1D: UPON INITIATION OF LOCAL SERVICE, AND ANNUALLY THEREAFTER, PROVIDE A BILL INSERT OR A SEPARATELY MAILED BROCHURE TO THE CUSTOMER IN THE PREFERRED LANGUAGE THAT EXPLAINS THE CUSTOMER'S BILL.

Pacific believes this change in the wording would permit essential flexibility in the utility's capability to provide the information using various distribution media, while still informing the consumer of how to read the bill.

GTEC favors some, but not all, of the provisions in the proposed agreement. GTEC objects to its being immediately required to fully comply with all of the rule's provisions. GTEC supports the requirement to identify and store customers' language preference in a data base, provided no further

requirements other than identification and storage are imposed upon it. GTEC's current database can merely identify whether a given customer is English-speaking or not, and database information is accessible only by on-line customer service representatives. While GTEC believes that its database system can be modified to identify specific non-English-speaking customer preferences without extreme expense, it claims further integration of the data base into its other networking systems remains improbable. Given the logistical difficulties involved, GTEC foresees only two ways it could comply with the proposed requirement for in-language production of Commission-mandated notices: (1) direct mail or (2) in-language paragraph summaries. GTEC could enhance its current printing facilities or outsource the materials to be included in a direct mailing to its affected non-English-speaking customers. GTEC believes, however, that direct mail would be costly. GTEC supports a provision for the inclusion of a short paragraph summary of the notice (in language) and a toll-free number for the affected customers to request additional information. Upon contacting the call-in number, the customer would be assisted by an in-language representative. GTEC believes this approach would be a more efficient alternative. GTEC opposes being required to prepare in-language confirmation letters to non-English-speaking customers describing the services ordered and related charges. GTEC claims great time and expense would be required to develop a text and/or graphic interface to align the various services and charges. Asian languages require a more complicated graphic image rather than simple text entry. GTEC does not object, however, to providing a general explanation of the customer's bill in any of the seven designated languages, provided that it may use either a bill insert or direct mail to notify customers. GTEC agrees to expand its existing multilingual customer service center capabilities to

include all seven of the designated languages. GTEC also supports the provision for Universal Lifeline Telephone Service notices patterned after Pacific's insert for each of the seven designated languages.

Citizens Utilities Company (Citizens)⁵ While Citizens expresses support for the goal of ensuring that LECs and CLCs take steps to communicate with their customers so they can understand the nature and cost of telephone service, Citizens believes, however, that the Commission should consider multilingual outreach efforts currently in place before imposing new, burdensome obligations which will increase costs on carriers and their customers.

Less than 2% of the customer base in the territories served by Citizen's various carrier entities are non-English speaking. Citizens describes the various procedures it already has in place to serve non-English-speaking customers. Citizens is not currently equipped, however, to track customers by various language preferences, as proposed in the parties' agreement. Citizens argues that the costs to develop the capabilities to comply with all aspects of the proposed rule would be prohibitively expensive. Citizens supports Commission encouragement of CLCs and LECs offering additional bilingual services, but believes market forces - rather than regulatory mandates - should be relied upon to achieve this goal.

the services ordered and related charges. GTEC claims that the and expense would be required to develop a text and/or graphic interface to align the various services and charges. Asian languages require a more complicated graphic image rather than simple text entry. GTEC does not object, however, to providing a general explanation of the customer's bill in any of the seven

⁵ Citizens files its comments on behalf of each of its telecommunications companies in California which include a mid-sized LEC, CLCs, and long distance carriers.

apply to 411, 611, 911 and (California Relay Service) (CRS) services. ORA opposes any additional subsidy funding for multilingual outreach programs. Pacific does not currently receive any subsidy for their extensive outreach, customer service, and marketing programs in non-English languages, and noted that it would intend to seek some form of subsidy for such costs if the Commission orders multi-language outreach, rather than depending on the marketplace to drive such efforts. ORA believes that the marketplace will drive multi-language customer outreach as is the case today, and that additional funding is not needed.

ORA does not oppose adoption of the terms of Appendix A, subject to certain concerns raised upon a clear statement that no subsidies will be provided to LECs, to CLCs or to any other party.

We conclude that the rules adopted in D.95-07-054 and D.96-02-072 for multilingual customer billing and notice have the unintended consequence of creating some disincentives for CLCs to market their services to non-English-speaking customers, thereby frustrating our goal of competitive choice for all Californians. The rules impose compliance burdens on the CLCs which essentially make it commercially infeasible for them to market telecommunications services to non-English-speaking customers. The rules are also more burdensome than the corresponding requirements on incumbent LECs and thus tend to impede the goal of a level competitive playing field.

As discussed in the workshop, there are practical constraints making it presently infeasible for both CLCs and LECs to prepare monthly bills in multiple languages. Moreover, there are differences in capabilities among individual CLCs and LECs. Large CLCs such as MCI and AT&T have greater resources with which to develop multilingual capabilities than do smaller CLCs.

Likewise, Pacific and GTEC have greater resources than do smaller LECs to offer multilingual services. The service territories of Pacific and the Volcano Telephone Company, the Siskiyou Telephone Company, and the West Coast Telephone Company, the West Coast Telephone Company, the Siskiyou Telephone Company, and the Volcano Telephone Company.

Pacific and GTEC are likewise more linguistically diverse than are the territories of the smaller LECs. It is not in the public interest to deprive non-English-speaking customers of competitive service alternatives merely because of carriers' inability to comply with overly restrictive rules. We believe that the multi-party agreement set forth in Appendix A constitutes an acceptable compromise which provides for certain designated information to be provided to non-English-speaking customers who are sold services in any of the seven most common non-English speaking languages in California. Under the proposal, languages spoken by approximately 94% of California's population would be actively covered.

Under the modified rules, a customer who is sold services in any of seven designated languages would receive a confirmation letter in the language of the initial sale which describes the services ordered and itemizes all charges which will appear on the bill. Annually thereafter, a bill insert will be provided in the preferred language explaining the customer's bill. The customer would also receive all Commission mandated notices, including the Universal Service Lifeline Notice in the designated language. The full terms of the adopted rules are set forth in Appendix A.

We agree in principle that Pacific and GTEC should be subject to the same multilingual requirements as are the CLCs in order to promote a level competitive playing field. As disclosed at the workshop, Pacific and GTEC already are providing or could readily provide many of the services in the proposed Appendix A agreement. We intend to consider in a subsequent phase of this rulemaking proceeding whether or to what extent Pacific and GTEC should be required to conform to the same multilingual rules as those imposed on the CLCs. As a practical matter, however, the existing capabilities of Pacific and GTEC appear to be constrained in their ability to immediately offer all of the services provided for in the Appendix A agreement. Accordingly, in the interests of

is sold basic dial tone service. It is at this initial stage of contact when the pertinent language of the customer is determined. While any subsequent change in the terms or conditions of the customer's service may generically involve an additional "sale," we do not include such subsequent "sales" within the context of our multilingual rules. If there is any question about which language the customer prefers for purposes of receiving subsequent notices, the carrier can simply ask the customer to indicate which language they prefer to be used. It is reasonable to assume that the language preferences of the customer will not change merely as a result of periodic changes in the terms of service. Findings of Fact

4. A Petition to Modify Decision (D) 95-07-054 and D.96-02-072 was filed by the California Telecommunications Coalition (Coalition) on April 3, 1996.

On May 3, 1996, Public Advocates filed an opposition to the Coalition's Petition for Modifications.

3. D.96-08-027, issued on August 2, 1996, concluded that the Coalition's Petition to Modify raised legitimate questions concerning whether our adopted rules create some disincentives for CLCs to market their services to non-English-speaking customers, thereby frustrating the goal of competitive choice for all Californians.

4. D.96-08-027 ordered that a workshop be held to identify constraints on carriers' ability to comply with multilingual requirements and alternative means of satisfying the intent of the Commission's multilingual rules.

5. Shortly following the end of the workshop, certain parties reached agreement on a proposed rule that resolved the dispute between Public Advocates and the Coalition.

6. The rules impose compliance burdens on the CLCs which essentially make it commercially infeasible for them to market telecommunications services to non-English speaking customers.

7. The rules adopted for CLCs are more burdensome than the corresponding requirements on incumbent LECs and thus tend to impede the goal of a level competitive playing field.

8. There are practical constraints making it infeasible for both CLCs and LECs to prepare monthly bills in multiple languages.

9. The service territories of Pacific and GTEC are more linguistically diverse than are the territories of the smaller LECs.

Conclusions of Law

1. The Petition to Modify D:95-07-054 and D:96-02-072 regarding pertinent multilingual customer requirements should be granted to the extent provided in the order below.

2. It is not in the public interest to deprive non-English-speaking customers of competitive service alternatives merely because of carriers' inability to comply with certain features of the Commission's rules, so long as acceptable alternatives will promote the Commission's consumer protection goals.

3. The multi-party agreement set forth in Appendix A constitutes a reasonable compromise of the dispute between Public Advocates and the Coalition by providing certain prescribed language information to non-English-speaking customers who are sold services in any of the seven most common non-English speaking languages in California.

4. In the interests of expedited adoption of revised rules, we shall limit the applicability of Appendix A to CLCs as provided in the order below.

5. The multilingual programs of Pacific and GTEC should continue to be monitored as a basis to consider bringing them into parity with the multilingual notice rules applicable to CLCs adopted in this order at a future date.

6. The rules adopted regarding multilingual customer requirements should not apply to incumbent LECs at this time or other non-CLC telecommunications carriers.

The Commission shall ORDER that the Commission shall consider whether or to what

extent to require compliance by Pacific and GTEC with our

IT IS ORDERED that the Commission shall consider whether or to what

The Petition to Modify Decision (D.) 195-07-054 and Decision D.96-02-072 regarding pertinent multilingual customer billing and notification requirements is hereby granted to the extent provided in the order below.

2. D.95-07-054 is hereby modified to delete Rule 2 of Appendix B which requires CLCs to provide a confirmation letter in a language other than English if the sale is made in another language.

3. D.96-02-072 is hereby modified to delete existing Rule 4(F)(16) of Appendix E which required CLCs to provide all billing and future customer notices in the language in which the service was sold.

4. The rule provisions set forth in Appendix A (the proposed rule agreed to by several parties pursuant to the multilingual workshop) shall be substituted for Rule 4(F)(16), Appendix E of D.96-02-072.

5. The revised multilingual rule shall not apply to 411 directory assistance, 611 repair calls, CRS, or to 911 emergency calls.

6. For purposes of applying the rules adopted herein, the sale for purposes of triggering the multilingual requirements shall refer only to the initial contact from which basic dial tone service is sold.

7. No subsidies shall be provided to CLCs or any other carrier to comply with the adopted modified rules.

8. Pacific and GTEC shall file a status report with the Commission by February 14, 1997, as to the costs, technical implementation impacts, and time schedule which would be needed to achieve full parity with the CLC with respect to multilingual requirements, as set forth in Appendix A.

9. The Commission shall further consider whether or to what extent to require compliance by Pacific and GTEC with our multilingual customer notice rules set forth in Appendix A following receipt of the status reports and opportunity for comment thereon. **This order is effective today.**

Dated October 25, 1996, at Sacramento, California

Appendix B which requires CDS to provide a confirmation letter in a language of the customer if the sale is made in another language.

GREGORY CONLON
President

JESSIE J. KNIGHT, JR.

HENRY M. DUQUE

JOSIAH L. NEEPER

Commissioner Daniel W. Fessler, being necessarily absent, did not participate.

rule agreed to by several parties pursuant to the multilingual workshop) shall be substituted for Rule 4(f)(6), Appendix B of

5. The revised multilingual rule shall not apply to all directory assistance, 911 repair calls, CDS, or to 911 emergency calls.

6. For purposes of applying the rules adopted herein, the sale for purposes of triggering the multilingual requirements shall refer only to the initial contract from which basic dial tone service is sold.

7. No subsidies shall be provided to CDS or any other carrier to comply with the adopted modified rules.

8. Pacific and GTEC shall file a status report with the Commission by February 14, 1997, as to the costs, technical implementation impacts, and time schedule which would be needed to achieve full parity with the CDS with respect to multilingual requirements, as set forth in Appendix A.

PROPOSED BILINGUAL CUSTOMER NOTIFICATION AND BILLING RULE

1. INCUMBENT LECS AND CLCS THAT SELL THEIR SERVICES IN ANY OF THE FOLLOWING SEVEN LANGUAGES - SPANISH, MANDARIN, CANTONESE, VIETNAMESE, KOREAN, JAPANESE OR TAGALOG - SHALL BE REQUIRED TO DO THE FOLLOWING IN THOSE LANGUAGES IN WHICH THEY SELL THEIR SERVICES:
 - A. IDENTIFY AND STORE IN A DATABASE THE LANGUAGE PREFERENCE ("LANGUAGE PREFERENCE DATABASE") SPECIFIED BY THEIR CUSTOMERS.
 - B. SEND COMMISSION-MANDATED NOTICES, INCLUDING THE UNIVERSAL LIFELINE SERVICE NOTICE WITH THE RATES, TERMS AND CONDITIONS, IN LANGUAGE.
 - C. UPON INITIATION OF LOCAL SERVICE, SEND THE CONFIRMATION LETTER TO THE CUSTOMER IN THE PREFERRED LANGUAGE, SETTING FORTH A BRIEF DESCRIPTION OF THE SERVICES ORDERED AND ITEMIZING ALL CHARGES WHICH WILL APPEAR ON THE CUSTOMER'S BILL.
 - D. UPON INITIATION OF LOCAL SERVICE AND ANNUALLY THEREAFTER, PROVIDE A BILL INSERT TO THE CUSTOMER IN THE PREFERRED LANGUAGE THAT EXPLAINS THE CUSTOMER'S BILL.
 - E. PROVIDE A TOLL-FREE NUMBER FOR ACCESS TO BILINGUAL SERVICE REPRESENTATIVES IN THE PREFERRED LANGUAGES IN WHICH THE CLC SELLS ITS SERVICES.
2. PROVIDE ALL RESIDENTIAL CUSTOMERS WITH THE COMMISSION-MANDATED UNIVERSAL LIFELINE TELEPHONE SERVICE NOTICE IN THE SEVEN LANGUAGES IDENTIFIED ABOVE AND INCLUDE WITH THE NOTICE TOLL FREE TELEPHONE NUMBERS FOR ACCESS TO BILINGUAL CUSTOMER SERVICE REPRESENTATIVES IN THE LANGUAGES IN WHICH THE CLC SELLS ITS SERVICES FROM THOSE LISTED ABOVE.
3. ALL LECS AND CLCS ARE ENCOURAGED TO PROVIDE ADDITIONAL BILINGUAL OR IN-LANGUAGE SERVICES TO THEIR CUSTOMERS.

The required notice would be a bill insert like the attached Pacific Bell 1996 Universal Lifeline Telephone Service notice.

PACIFIC BELL CALLING



CUSTOMER INFORMATION
Telephone with information

1998 ANNUAL NOTICE

You Can Lower Your Bill if You Qualify For Universal Lifeline Telephone Service

Universal Lifeline Telephone Service is basic local service at half price. (LANGUAGE PREFERENCE DATABASE) SPECIFIED BY THEIR IDENTIFY AND STORE IN A DATABASE THE LANGUAGE PREFERENCE

CHECK IT OUT

Universal Lifeline Telephone Service (LifeLine) is for you if you have a low income.

You qualify for Lifeline if you can answer "yes" to all three requirements on Page 2 of this month's bill.

To sign up for Lifeline, you must fill out the form on Page 2 of this month's bill and mail it with your bill payment.

You can order Lifeline through your Pacific Bell Business Office. The number appears on the first page of your bill under "where to call."



UPON RECEPTION OF LOCAL SERVICE, SEND LETTER TO THE CUSTOMER IN THE PREFERRED LANGUAGE. GETTING TOGETHER A BRIEF DESCRIPTION OF THE SERVICES ORDERED.

PACIFIC BELL



UPON RECEPTION OF LOCAL SERVICE, SEND LETTER TO THE CUSTOMER IN THE PREFERRED LANGUAGE. GETTING TOGETHER A BRIEF DESCRIPTION OF THE SERVICES ORDERED.



You Can Lower Your Bill if You Qualify For Universal Lifeline Telephone Service

To find out if you qualify for lower monthly rates, see Page 2 of this month's bill or call 1-800-446-5651.

가까이서 할 가격 전화요금! 확인하세요!
확인되는지 알기 원하시면
1-800-882-0522번으로 전화 주십시오

Si vous souhaitez savoir si vous êtes éligible à un tarif réduit, voir la page 2 de votre facture ou appelez le 1-800-882-0522.

이 서비스는 저소득층 고객에게만 제공됩니다.
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或 1-800-962-8250 國語服務

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a lower monthly rates, or you can call
1-800-956-8084.



PACIFIC BELL

A Pacific Telephone Company