

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the  
Commission's Own Motion to Comply with the  
Mandates of Senate Bill 1563 regarding  
deployment of Advanced Telecommunications  
Technologies.

R. 03-04-003

REPLY COMMENTS OF  
CITIZENS TELECOMMUNICATIONS COMPANY  
OF CALIFORNIA, INC. (U-1024-C) d/b/a  
FRONTIER COMMUNICATIONS COMPANY OF CALIFORNIA  
CITIZENS TELECOMMUNICATIONS COMPANY  
OF THE GOLDEN STATE (U- 1025-C) d/b/a  
FRONTIER COMMUNICATIONS COMPANY OF THE GOLDEN STATE  
CITIZENS TELECOMMUNICATIONS COMPANY  
OF TUOLUMNE (U-1023-C) d/b/a  
FRONTIER COMMUNICATIONS COMPANY OF TUOLUMNE

PURSUANT TO ORDER INSTITUTING RULEMAKING

E. Garth Black  
Mark P. Schreiber  
Sean P. Beatty  
Patrick M. Rosvall  
Cooper, White & Cooper LLP  
201 California Street, 17th Floor  
San Francisco, CA 94111  
(415) 433-1900  
(415) 433-5530 - Facsimile

Attorneys for the Frontier Companies

June 30, 2003

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking on the  
Commission's Own Motion to Comply with the  
Mandates of Senate Bill 1563 regarding  
deployment of Advanced Telecommunications  
Technologies.

R. 03-04-003

**REPLY COMMENTS OF**  
**CITIZENS TELECOMMUNICATIONS COMPANY**  
**OF CALIFORNIA, INC. (U-1024-C) d/b/a**  
**FRONTIER COMMUNICATIONS COMPANY OF CALIFORNIA**  
**CITIZENS TELECOMMUNICATIONS COMPANY**  
**OF THE GOLDEN STATE (U-1025-C) d/b/a**  
**FRONTIER COMMUNICATIONS COMPANY OF THE GOLDEN STATE**  
**CITIZENS TELECOMMUNICATIONS COMPANY**  
**OF TUOLUMNE (U-1023-C) d/b/a**  
**FRONTIER COMMUNICATIONS COMPANY OF TUOLUMNE**  
**PURSUANT TO ORDER INSTITUTING RULEMAKING**

Citizens Telecommunications Company of California, Inc. (U-1024-C) d/b/a  
Frontier Communications Company of California, Citizens Telecommunications Company of the  
Golden State (U-1025-C) d/b/a Frontier Communications Company of the Golden State, and  
Citizens Telecommunications Company of Tuolumne (U-1023-C) d/b/a Frontier Communications  
Company of Tuolumne (collectively, the "Frontier Companies") hereby file their reply comments in  
the above-referenced Order Instituting Rulemaking ("OIR") adopted on April 3, 2003. The Frontier  
Companies file these reply comments to address select issues raised by parties in their opening  
comments. In particular, the Frontier Companies note: 1) that many of the commenting parties fail  
to take into account the limited jurisdiction the Commission possesses over providers of advanced  
telecommunications technologies; 2) creation of a "Blue Ribbon Task Force" is not necessary; 3)  
the Commission should decline to address issues that are currently under consideration in other

1 open dockets; 4) notwithstanding inflammatory rhetoric regarding the alleged potential for abuse of  
2 the Universal Lifeline Telephone Service ("ULTS") fund, the Commission should acknowledge that  
3 policy decisions regarding who must pay how much for access to advanced technologies must be  
4 considered before issuing mandates; 5) that technology neutral policies should be adopted by the  
5 Commission; 6) that The Utility Reform Network is correct to observe that mere deployment of  
6 advanced telecommunications technology does not ensure access to such technology; and 7) that the  
7 Commission should consider expanding eligibility to participate in the California Teleconnect Fund  
8 ("CTF") to as many community-based organizations as possible.

9  
10 **II. THE COMMISSION'S SHOULD ACCOUNT FOR ITS LIMITED JURISDICTION**  
11 **WHEN CONSIDERING ITS ROLE IN ENCOURAGING ACCESS TO ADVANCED**  
12 **TECHNOLOGIES.**

13 Several parties embrace the principle that the Commission should proactively participate in  
14 ensuring access to advanced telecommunications technologies. For example, Latino Issues  
15 Forum/Greenling Institute ("LIF/GI") encourage the Commission to extract ". . . settlements or  
16 agreements with telecommunications companies appearing before it in which companies pledge to  
17 provide free or substantially reduced advanced telecommunications technologies to low-income  
18 customers . . ." *See* LIF/GI Opening Comments, p. 5. However, such an approach creates  
19 competitive imbalances because the Commission is in no position to extract such concessions from  
20 other potential providers of advanced telecommunications technologies such as cable television  
21 operators, wireless carriers, or satellite video distributors. Similarly, the California Community  
22 Technology Policy Group ("CCTPG") suggests that the Commission should adopt policies that  
23 account for participation by cable and satellite providers. *See* CCTPG Opening Comments, p. 7.  
24 The CCTPG comments suggest that mandates imposed by the Commission on entities within its  
25 jurisdiction could be imposed by local and federal jurisdictions on those entities outside its  
26 jurisdiction. The Frontier Companies are skeptical that such regulatory symmetry will be obtained  
27 any time soon and urge the Commission to refrain from issuing mandates that cannot be evenly  
28 applied to all potential providers of advanced telecommunications technologies.

1 **III. THE FRONTIER COMPANIES OPPOSE CREATION OF A "BLUE RIBBON**  
2 **TASK FORCE."**

3 The Frontier Companies oppose the suggestion of several parties that the Commission  
4 should establish a "Blue Ribbon Task Force" to consider issues related to the potential barriers  
5 related to the availability of advanced telecommunications technologies. This OIR was opened to  
6 generate a record on the very topics that the proposed task force would address. Any potential  
7 members of the task force have the opportunity to submit their views into the record. If additional  
8 time is needed to allow such individuals the opportunity to air their views in the record of this  
9 proceeding, the Frontier Companies are not opposed. However, the Frontier Companies are  
10 opposed to the creation of a group that would likely be highly political and subject to open meeting  
11 laws. The creation of such a "Blue Ribbon Task Force" would be an expensive proposition for  
12 interested parties, particularly if the proposal to ". . . hold a series of workshops throughout the state  
13 to solicit and incorporate community comments . . .," were adopted. In truth, the Commission is the  
14 "Blue Ribbon Task Force" that must digest the comments of interested parties and generate a policy  
15 decision as directed by the Legislature. Creating a secondary panel would unnecessarily add an  
16 additional layer of decision-making with little added benefit to the Commission's administrative  
17 process.

18  
19 **IV. THE COMMISSION SHOULD NOT EXPAND THE SCOPE OF THIS**  
20 **PROCEEDING TO CONSIDER ISSUES CURRENTLY ADDRESSED IN OTHER**  
21 **ACTIVE PROCEEDINGS.**

22 Opening comments filed by MCI/Covad provide voluminous, intricate discussion regarding  
23 why the Commission must issue an order requiring carriers to unbundle their networks to encourage  
24 the availability of advanced telecommunications technologies. LIF/GI contend that the Commission  
25 must issue linguistic mandates to carriers and modify complaint resolution processes to encourage  
26 deployment of and access to advanced telecommunications technologies. See LIF/GI Opening  
27 Comments, p. 10. The similarity shared by these parties' comments is that they address issues that  
28 are squarely addressed by other open Commission proceedings. Unbundled network elements

1 ("UNEs") are the primary focus of the Commission's OANAD proceeding. Furthermore, the  
2 Commission will likely find itself grappling with UNEs as a result of the Federal Communications  
3 Commission's recent decision in its triennial review, the text of which will be released any day now.  
4 Carrier language requirements are a controversial issue that are before the Commission in the  
5 consumer protection rulemaking. The Commission has a substantial record before it on language  
6 requirements in that proceeding. For these reasons, the Commission should not take up these issues  
7 in this proceeding.

8  
9 **V. CONCERNS ABOUT THE ULTS PROGRAM SUGGEST THAT ISSUES TO BE**  
10 **ADDRESSED IN THIS PROCEEDING ARE MORE APPROPRIATELY HANDLED**  
11 **BY THE LEGISLATURE.**

12 LIF/GI warns the Commission that the ULTS program should be managed prudently so as  
13 not to become a "cash cow" as a result of a Commission decision to include ULTS in its plan to  
14 encourage access to advanced telecommunications technologies. While the Frontier Companies  
15 agree that the ULTS program should only apply to basic service, the use of inflammatory rhetoric  
16 such as "cash cow" casts the ULTS program and the carriers who participate in it in a negative light,  
17 distracting attention from the legitimate issues surrounding any proposal for a ULTS-like program  
18 for encouraging access to advanced telecommunications technology. Fundamental to LIF/GI's  
19 concerns regarding the ULTS program are issues of who should pay for Commission endeavors to  
20 increase access to advanced telecommunications technology. At bottom, this is a substantial social  
21 issue that is likely more appropriately addressed by the legislature. Accordingly, to the extent the  
22 Commission develops proposals that require significant funding obligations, the Frontier  
23 Companies recommend that the Commission obtain approval from the legislature before embarking  
24 on a program that will have significant social impacts.

25  
26 **VI. THE COMMISSION MUST ADOPT TECHNOLOGY NEUTRAL POLICIES.**

27 The Frontier Companies agree with the Office of Ratepayer Advocates that the Commission  
28 should be technology neutral in any of its undertakings to encourage access to advanced

1 telecommunications technology. For example, not long ago it appeared that ISDN would become a  
2 primary technology for providing broadband access to residential subscribers. However,  
3 technological developments overtook ISDN, making DSL the currently preferred technology for  
4 residential broadband access offered by telephone companies and cable modem service a forceful  
5 competitor in the residential broadband market. Accordingly, the Commission should not commit  
6 to a particular technology in any of the policy decisions it may issue in this proceeding.

7  
8 **VII. MERE DEPLOYMENT OF ADVANCED TECHNOLOGY DOES NOT ENSURE**  
9 **ACCESS TO SUCH TECHNOLOGY.**

10 The Frontier Companies agree with a premise relied upon by TURN, specifically, that  
11 deployment of advanced technology is only part of the problem of bridging the "digital divide."  
12 While deployment of broadband facilities has occurred throughout much of California, including in  
13 the Frontier Companies' service areas, such deployment has not necessarily resulted in a similar  
14 level of subscription by end-users. The market for broadband access is relatively young, and it is  
15 not absolutely clear what will drive the demand for such services. Accordingly, the Commission  
16 must understand the underpinnings of both current and future demand for advanced  
17 telecommunications technology before it can devise a plan to ensure that such demand is met.

18  
19 **VIII. THE COMMISSION SHOULD CONSIDER EXPANDING ELIGIBILITY FOR THE**  
20 **CTF TO ENCOURAGE ACCESS TO ADVANCED TECHNOLOGIES.**

21 The Frontier Companies reiterate their position that the Commission should closely examine  
22 the possibility of expanding the CTF to include a larger group of non-profit organizations capable of  
23 providing access to advanced technologies to individuals who may not have access to such services  
24 at their homes. Possible non-profits that could provide such access are churches, local boys and  
25 girls clubs, and similar neighborhood organizations that might not satisfy the technical requirements  
26 applied under the CTF's current eligibility standards.

1 **IX. CONCLUSION.**

2 The Frontier Companies remain opposed to any Commission mandate that endorses a  
3 particular technology or substitutes the Commission's judgment for that of company executives  
4 tasked with making deployment decisions. As mentioned in their opening comments, the Frontier  
5 Companies remain concerned that the Commission address the issue of cost recovery associated  
6 with any mandate it may originate in this proceeding, including who will pay for such mandates.  
7 With respect to opening comments of interested parties, the Frontier Companies oppose the creation  
8 of a "Blue Ribbon Task Force" and expanding this proceeding to include topics that are currently  
9 addressed in other Commission proceedings. Finally, the Frontier Companies support expanding  
10 the CTF to include the broadest scope of non-profit organizations that could potentially encourage  
11 access to advanced telecommunications technologies.

12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Executed at San Francisco, California this 30th day of June 2003.

E. Garth Black  
Mark P. Schreiber  
Sean P. Beatty  
Patrick M. Rosvall  
COOPER, WHITE & COOPER LLP  
201 California Street  
Seventeenth Floor  
San Francisco, CA 94111  
Telephone: (415) 433-1900  
Telecopier: (415) 433-5530

By:   
Sean P. Beatty

Attorneys for the Frontier Companies

473257.1

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE BY MAIL**

I, Janet Doherty, declare:

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is COOPER, WHITE & COOPER LLP, 201 California Street, Seventeenth Floor, San Francisco, CA 94111.

On June 30, 2003, I served the foregoing

**REPLY COMMENTS OF**

**CITIZENS TELECOMMUNICATIONS COMPANY  
OF CALIFORNIA, INC. (U-1024-C) d/b/a  
FRONTIER COMMUNICATIONS COMPANY OF CALIFORNIA**

**CITIZENS TELECOMMUNICATIONS COMPANY  
OF THE GOLDEN STATE (U- 1025-C) d/b/a  
FRONTIER COMMUNICATIONS COMPANY OF THE GOLDEN STATE**

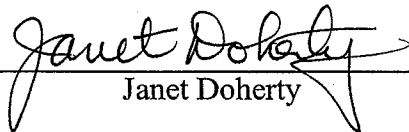
**CITIZENS TELECOMMUNICATIONS COMPANY  
OF TUOLUMNE (U-1023-C) d/b/a  
FRONTIER COMMUNICATIONS COMPANY OF TUOLUMNE**

**PURSUANT TO ORDER INSTITUTING RULEMAKING**

by placing a true and correct copy thereof with the firm's mailing room personnel for mailing in accordance with the firm's ordinary practices to the parties on the CPUC's service list in this proceeding. An Adobe Acrobat PDF version of this document was also served via e-mail on those parties on this service list who provided an e-mail address.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 30, 2003, at San Francisco, California.

  
\_\_\_\_\_  
Janet Doherty



**Service List  
R. 03-04-003  
(CPUC 6/20/03)**

MARIANNE ROACH CASSERLY  
ALSTON & BIRD LLP  
601 PENNSYLVANIA AVE., NW  
NORTH BLDG., 10/F  
WASHINGTON, DC 20004

RICHARD B. LEE  
SNAVELY KING & MAJORS  
O'CONNOR & LEE, INC.  
1220 L STREET, N.W.  
SUITE 410  
WASHINGTON, D.C. 20005

TERRANCE SPANN  
REGULATORY LAW OFFICE  
US ARMY LEGAL SERVICES AGENCY  
DEPT. OF THE ARMY  
JALS-RL 901 N. STUART STREET, SUITE 700  
ARLINGTON, VA 22203-1837

WILLIAM J. COBB III, ATTORNEY AT LAW  
COVAD COMMUNICATIONS COMPANY  
100 CONGRESS AVENUE, SUITE 2000  
AUSTIN, TX 78701

EUGENE M. ENG  
VERIZON CALIFORNIA, INC.  
CA501LS  
112 LAKEVIEW CANYON ROAD  
THOUSAND OAKS, CA 91362

LEE BURDICK, ATTORNEY AT LAW  
FERRIS & BRITTON  
401 WEST A STREET, SUITE 1600  
SAN DIEGO, CA 92101

CAMILLE A. ESTES  
BOWEN LAW GROUP  
235 MONTGOMERY STREET, SUITE 202  
SAN FRANCISCO, CA 94102

JESUS G. ROMAN  
VERIZON  
711 VAN NESS AVENUE, SUITE 300  
SAN FRANCISCO, CA 94102

WILLIAM R. NUSBAUM, ATTORNEY AT LAW  
THE UTILITY REFORM NETWORK  
711 VAN NESS AVENUE, ROOM 350  
SAN FRANCISCO, CA 94102

ITZEL BERRIO, ATTORNEY AT LAW  
THE GREENLINING INSTITUTE  
785 MARKET STREET, 3RD FLOOR  
SAN FRANCISCO, CA 94103-2003

SUSAN E. BROWN  
ATTORNEY AT LAW  
LATINO ISSUES FORUM  
785 MARKET STREET, 3<sup>RD</sup> FLOOR  
SAN FRANCISCO, CA 94103-2003

RANDOLPH W. DEUTSCH  
SIDLEY AUSTIN BROWN & WOOD LLP  
555 CALIFORNIA STREET, SUITE 5000  
SAN FRANCISCO, CA 94104

STEPHEN P. BOWEN, ATTORNEY AT LAW  
BOWEN LAW GROUP  
235 MONTGOMERY STREET, SUITE 920  
SAN FRANCISCO, CA 94104

GARRETT L. WONG, ATTORNEY AT LAW  
SBC PACIFIC BELL TELEPHONE COMPANY  
140 NEW MONTGOMERY ST., ROOM 1619  
SAN FRANCISCO, CA 94105

ROBERT MUNOZ  
MCI WORLDCOM, INC.  
201 SPEAR STREET 9TH FLOOR  
SAN FRANCISCO, CA 94105

WILLIAM C. HARRELSON  
ATTORNEY AT LAW  
MCIMETRO ACCESS TRANSMISSION  
SERVICES, LLC  
201 SPEAR STREET  
SAN FRANCISCO, CA 94105

KATY M. LINDSAY  
AT&T  
795 FOLSOM STREET, SUITE 2155  
SAN FRANCISCO, CA 94107-1243

J. KENDRICK KRESSE  
CALIFORNIA CENTER FOR LAW  
AND THE DEAF  
14895 EAST 14TH STREET, SUITE 220  
SAN LEANDRO, CA 94578

JOHN GUTIERREZ  
DIRECTOR, GOVERNMENT AFFAIRS  
COMCAST PHONE OF CALIFORNIA, LLC  
12647 ALCOSTA BLVD., SUITE 200  
SAN RAMON, CA 94583

WILLIAM H. BOOTH  
ATTORNEY AT LAW  
LAW OFFICES OF WILLIAM H. BOOTH  
1500 NEWELL AVENUE, 5<sup>TH</sup> FLOOR  
WALNUT CREEK, CA 94596

LATANYA LINZIE  
COX CALIFORNIA TELCOM, L.L.C.  
2200 POWELL STREET, SUITE 1035  
EMERYVILLE, CA 94608

GLENN SEMOW  
CALIFORNIA CABLE & TELECOMM. ASSOC.  
4341 PIEDMONT AVENUE  
OAKLAND, CA 94611

LESLA LEHTONEN  
ATTORNEY AT LAW  
CALIFORNIA CABLE & TELECOMM. ASSOC.  
4341 PIEDMONT AVENUE  
OAKLAND, CA 94611

SHELLEY BERGUM  
DEAF & DISABLED  
TELECOMMUNICATIONS PROGRAM  
505 14TH STREET, SUITE 400  
OAKLAND, CA 94612-3532

CHARLES E. BORN, MANAGER  
STATE GOVERNMENT AFFAIRS  
FRONTIER, A CITIZENS  
TELECOMMUNICATIONS COMPANY  
PO BOX 340  
ELK GROVE, CA 95759

STEPHEN GOODMAN  
PREPAID TEL.COM INC.  
409 CENTER STREET  
YUBA CITY, CA 95991

PENNY H. BEWICK  
NEW EDGE NETWORKS, INC.  
3000 COLUMBIA HOUSE BLVD., 106  
VANCOUVER, WA 98661

FREDERICK M. JOYCE  
ALSTON & BIRD LLP  
601 PENNSYLVANIA AVENUE N.W.  
NORTH BLDG., 10/F  
WASHINGTON, DC 20004

JOHN M. FELZ  
SPRINT  
KSOPHN0204-2B603  
6450 SPRINT PARKWAY  
OVERLAND PARK, KS 66251-6100

SCOTT FREIERMUTH  
SPRINT PCS  
KSOPHN0212-2A409  
6450 SPRINT PARKWAY  
OVERLAND PARK, KS 66251-6100

RICHARD CHABRAN  
CALIFORNIA COMMUNITY  
TECHNOLOGY POLICY  
606 SOUTH OLIVE STREET, SUITE 2400  
LOS ANGELES, CA 90014

JAMES LAU  
TECHNOLOGY PROGRAM MANAGER  
THE CHILDREN'S PARTNERSHIP  
1351 THIRD ST. PROMENADE, STE 206  
SANTA MONICA, CA 90401-1321

ESTHER NORTHRUP  
ATTORNEY AT LAW  
XO CALIFORNIA, INC.  
5771 COPELY DRIVE  
SAN DIEGO, CA 92111

KAREN M. POTKUL, VICE PRESIDENT  
LEGAL & REGULATORY AFFAIRS  
XO CALIFORNIA INC.  
1924 DEERE AVENUE  
SANTA ANA, CA 92705

LINDA J.K. ROLLER  
REGULATORY MANAGER  
THE PONDEROSA TELEPHONE CO.  
PO BOX 21  
O'NEALS, CA 93645

EDWIN D. JONES, PRESIDENT  
TESCO  
1263 ALICANTE DR.  
PACIFICA, CA 94044-4306

ENRIQUE GALLARDO  
SENIOR PROGRAM MANAGER  
LATINO ISSUES FORUM  
785 MARKET STREET, 3<sup>RD</sup> FLOOR  
SAN FRANCISCO, CA 94103-2003

COMMUNITY TECHNOLOGY  
FOUNDATION OF CALIFORNIA  
101 SPEAR STREET, SUITE 218  
SAN FRANCISCO, CA 94105

JAMIE MALONE  
SBC PACIFIC BELL TELEPHONE COMPANY  
140 NEW MONTGOMERY, ROOM 708  
SAN FRANCISCO, CA 94105

JULIAN C.L. CHANG  
AT&T COMMUNICATIONS OF  
CALIFORNIA, INC.  
795 FOLSOM STREET, ROOM 2164  
SAN FRANCISCO, CA 94107

MARGARET L. TOBIAS  
SIMPSON PARTNERS LLP  
460 PENNSYLVANIA AVENUE  
SAN FRANCISCO, CA 94107

DAVID A. SIMPSON  
ATTORNEY AT LAW  
SIMPSON PARTNERS LLP  
900 FRONT STREET  
SAN FRANCISCO, CA 94111

DAVID MARCHANT  
ATTORNEY AT LAW  
DAVIS WRIGHT TREMAINE LLP  
ONE EMBARCADERO CENTER, STE 600  
SAN FRANCISCO, CA 94111-3834

STEVE KUKTA  
SPRINT COMMUNICATIONS COMPANY L.P.  
1850 GATEWAY DRIVE, 7TH FLOOR  
SAN MATEO, CA 94404-2467

THERESA CABRAL, ATTORNEY AT LAW  
MORRISON & FOERSTER, LLP  
101 YGNACIO VALLEY ROAD, SUITE 450  
WALNUT CREEK, CA 94596

PHIL CEGUERA  
COVAD COMMUNICATIONS COMPANY  
3420 CENTRAL EXPRESSWAY  
SANTA CLARA, CA 95051

NANCY GRIFFIN  
REGULATORY COMPLIANCE  
PAC-WEST TELECOMM. INC.  
1776 W. MARCH LANE, SUITE 250  
STOCKTON, CA 95207

MARIA E. STEVENS  
CALIF PUBLIC UTILITIES COMMISSION  
EXECUTIVE DIVISION  
320 WEST 4TH STREET SUITE 500  
LOS ANGELES, CA 90013

PETER Y. CHANG  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE BRANCH  
320 WEST 4<sup>TH</sup> STREET, SUITE 500  
LOS ANGELES, CA 90013

CYNTHIA WALKER  
CALIF PUBLIC UTILITIES COMMISSION  
MARKET STRUCTURE BRANCH  
505 VAN NESS AVENUE, ROOM 4102  
SAN FRANCISCO, CA 94102-3214

KIM MALCOLM  
CALIF PUBLIC UTILITIES COMMISSION  
DIVISION OF ADMINISTRATIVE LAW JUDGES  
505 VAN NESS AVENUE, ROOM 5005  
SAN FRANCISCO, CA 94102-3214

NATALIE WALES  
CALIF PUBLIC UTILITIES COMMISSION  
LEGAL DIVISION  
505 VAN NESS AVENUE, ROOM 4107  
SAN FRANCISCO, CA 94102-3214

PAUL S. PHILLIPS  
CALIF PUBLIC UTILITIES COMMISSION  
TELECOMMUNICATIONS BRANCH  
505 VAN NESS AVENUE, ROOM 4101  
SAN FRANCISCO, CA 94102-3214

ROBERT LEHMAN  
CALIF PUBLIC UTILITIES COMMISSION  
CONSUMER ISSUES BRANCH  
505 VAN NESS AVENUE, ROOM 4102  
SAN FRANCISCO, CA 94102-3214