



September 11, 2006

VIA HAND DELIVERY AND E-MAIL

Commissioner Michael R. Peevey
Administrative Law Judge Janice L. Grau
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Mass Migration Guidelines R.03-06-020

Dear Commissioner Peevey and ALJ Grau:

The Utility Reform Network (“TURN”) and the Division of Ratepayer Advocates (“DRA”) have reviewed the Draft Decision of Administrative Law Judge Grau and are not filing comments because we believe the Draft Decision represents a fair outcome in this proceeding. We believe that the Draft Decision provides real protections for consumers who find they need to switch local exchange carriers in the event their competitive carrier exits the business. We also believe that the Draft Decision contains no significant legal or factual errors, and therefore urge the Commission to adopt the Draft Decision as it is currently written.

Yours truly,

William R. Nusbaum
Senior Telecommunications Attorney
The Utility Reform Network

Natalie L. Billingsley
Program and Project Supervisor
Division of Ratepayer Advocates
California Public Utilities Commission

cc: Via e-mail only:
Commissioner Geoffrey F. Brown
Commissioner Dian Grueneich
Commissioner John Bohn
Commissioner Rachelle Chong
Service list for R.05-09-006