

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 11, 2014

Ryan Dulin
Director of Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Draft Resolution T-17443 Implementation of New Timelines for California Advanced Services Fund Applicants

Dear Mr. Dulin,

Pursuant to Rule 14.5 of the California Public Utilities Commission's Rules of Practice and Procedure, the Office of Ratepayer Advocates (ORA) submits these comments on Draft Resolution T-17443, mailed on May 27, 2014. Draft Resolution T-17443 implements new timelines for applicants to the California Advanced Services Fund (CASF), including how and when local government agencies and non-telephone corporations may apply pursuant to Senate Bill (SB) 740. It also describes how existing providers may exercise their right-of-first-refusal as provided under SB 740. In addition, the Resolution lists areas in California that various CASF-funded regional consortia groups and state agencies have identified as priorities for broadband infrastructure deployment. SB 740 set a goal for the Commission to approve funding for infrastructure projects that will provide broadband access to no less than 98% of California households by no later than December 31, 2015.

As discussed below, the Draft Resolution sets up a process by which existing providers might "game the system" in order to avoid making any firm commitment to upgrade its system and discourage any other potential providers from applying for CASF funds. ORA's comments offer an alternative approach in order to remedy these concerns. ORA makes some additional recommendations in order to improve transparency and information available to the public and potential CASF applicants on areas where existing providers intend to upgrade their broadband networks. Finally, ORA recommends posting updates to the CASF website on the status of any unserved/underserved area in order to facilitate public feedback to demonstrate if in fact the area is unserved/underserved.

A. Existing Providers – the proposed right-of-first-refusal process sets up a potential to "game the system"

ORA requests clarification and modification to the "right-of-first-refusal" period, as the proposed filing dates set up a confusing process. Under the proposed process, the existing provider (EP) has until September 26, 2014, to file a letter of intent (LOI) with Communications Division (CD)

to upgrade its broadband networks in its present service territory with underserved households.¹ If the EP wants California Advanced Services Funds (CASF) in order to perform this upgrade, it must file its CASF application by October 1, 2014. Presumably, other providers may also submit CASF applications during this first application round due date of October 1, 2014.

However, the allowance of only four (4) days between the filing of the LOI and the due date for the first round of applications provides the EP an opportunity to “game the system” and discourage competing grant applications. If the EP issues an LOI to upgrade its broadband network on September 26, 2014, then it is responsible for completing the upgrade by April 1, 2015. If the EP does not finish the project, only then can Staff consider applications received for projects that would serve part of or the entire area.² However, as the Draft Resolution acknowledges:

An application for a CASF grant can be very [sic] a lengthy process and require significant company resources. Thus, most, if not all, companies will wait to see which areas are claimed by existing providers exercising their right of first refusal before expending those resources to apply for a CASF grant.³

Given the time and resources involved in compiling and submitting an application, ORA is concerned that providing only four (4) days’ notice of intent to upgrade essentially guarantees that no other potential provider will submit CASF applications on October 1, 2014, for underserved areas. Therefore, ORA recommends the following approach:

1. On September 26, 2014, the EP submits an LOI stating whether they will use their own money to upgrade the broadband network or seek CASF funding.⁴ If the EP chooses to self-fund the upgrade, then the commitment is binding and the upgrade can be completed by April 1,

¹ An EP exercises its right-of-first-refusal by submitting a letter of intent (LOI).

² Draft Resolution at 7.

³ *Id.*, at 5.

⁴ ORA’s preferred policy approach would be to require that the exercise of an EP’s right-of-first refusal be limited to upgrades that it will fund with its own money and to require that the EP execute the upgrade in six months or be subject to an enforcement action. Under this preferred policy approach, the EP would not be able to exercise the right-of-first refusal if it seeks CASF funding for its proposed upgrade. This is preferred because ORA would rather have an EP compete with any other potential CASF applicant for CASF funds so that the most cost-effective solution can be considered for funding, and this approach would not discourage other applicants from applying for CASF funds in the earlier rounds of submission due dates. Moreover, this approach would minimize delay in upgrading underserved areas in cases where the EP applies for CASF funds but is denied, as the EP would not be able to exercise its right of first refusal before other potential applicants are considered. However, as it is unclear whether this preferred policy approach is consistent with the applicable statute, ORA makes an alternative recommendation in these comments, whereby if an EP chooses to apply for CASF funding to upgrade its existing service, it does not compete with applications from non-CPCN/WIR holders in the same project area.

2014. If the EP chooses to make the upgrade with CASF funds, it should clearly indicate its intent to apply for CASF funds in its LOI.

2. On October 1, 2014, if an EP decides to seek CASF funding, it must file its CASF application. If it fails to do so, then its right-of-first-refusal expires. Any other grant applicant who is also interested in serving the area will submit a letter on October 1, 2014 identifying the area they want to serve and their intent to file a CASF application if the EP's application is denied.
3. On December 1, 2014, if the EP application is not challenged nor has any issues, CD notifies the EP of its determination on the CASF grant application. Since there would be only one application to review in an area, the funding evaluation should consider the following factors, in addition to other factors currently applied by CD in assessing CASF applications: 1) the EP's financial ability to fund the upgrade without CASF funds or with partial CASF funds lower than the amount requested by the EP and 2) whether there are any other potential grant applicants willing to serve the area (as indicated by their October 1, 2014, notices).
4. On December 1, 2014, if CD denies the request in whole or grants only partial CASF funding (i.e., a grant amount lower than that requested by the EP), then the EP has five (5) days to notify CD that it will accept the CASF funding amount determined by CD. If such notification is provided, then CD will prepare a Resolution for the Commission's approval at a later date.
5. In the event CD rejects the EP's funding request, then the EP has the same 5 days to notify CD that it will self-fund the upgrades; this would be a binding commitment on the part of the EP (i.e., it must complete the upgrades by April 1, 2015, or else it would be in violation and be subject to enforcement action). Thus, this five day period gives the EP time to decide what to do and provides other interested parties time to prepare their CASF applications. If the EP does not self-fund or does not accept CD's CASF grant offer or is otherwise silent in this five day period, then its right-of-first-refusal expires and it cannot exercise it again for the life of the CASF program.
6. If the EP decides not to accept CD's determination and/or not to self-fund, then on January 15, 2015, all other grant applicants or interested parties can submit their CASF application.

This approach will prevent the scenario whereby an EP can avoid committing to upgrading its broadband network by deciding not to file a LOI on September 26, 2014, and yet still file a

CASF application on October 1, 2014 (and be the only applicant as other potential applicants would be deterred from filing due to the 4 day window.)

By having other parties file their LOI on the same date, October 1, 2014, this will put CD on notice that there are other grant applicants willing to serve the area. It will also ease ORA's concern about the absence of competing applications, and the lack of any commitment to upgrade an underserved area.

ORA further recommends that there be a binding commitment from an EP issuing an LOI to upgrade its existing service in underserved areas, such as an affidavit stating such. If the EP does not meet its commitment to build out in the specified area, it should constitute a violation and be subject to enforcement action.

B. The April 1, 2015 completion date for EPs exercising their right-of-first-refusal should be binding

ORA further recommends that the April 1, 2015, deadline for an EP to complete its network upgrade be a hard and firm deadline. If an EP files an LOI on September 26, 2014, stating that it will upgrade the existing network, then the April 1, 2015 completion date is reasonable and should be binding.

If the EP uses its own money to fund the upgrade, then it can begin immediately. If it seeks CASF funding, then under the process proposed by ORA above, the EP will know by December 1, 2014, whether it will receive the grant. In any event, it should have sufficient time to complete the project and any commitment to upgrade its broadband network should be binding, and failure to complete the project should constitute a violation and be subject to enforcement penalties.

C. The Commission should post a list of all areas where Existing Providers intend to upgrade their broadband network on the CASF website

According to the Draft Resolution, the existing provider must submit its LOI to the Director of CD and must email a copy to the CASF distribution list.⁵ ORA recommends that CD post on its CASF webpage a list of all the areas EPs have issued letters of intent to upgrade their existing networks so that the public and any other potential CASF applicant who is not part of the CASF distribution list can be made aware of such areas. The list of areas where EPs intend to build out should also clearly identify if the EP is planning to apply for CASF funding to make such upgrade. ORA recommends that the example letter in Appendix 3 of the Draft Resolution be updated to include an indication from the EP as to whether it plans to submit a CASF application.

⁵ Draft Resolution at 5.

D. The Commission should post the priority list spreadsheet to show updates to the status of any underserved area on the CASF website

The Draft Resolution states that CD asked currently existing regional consortia to determine priority areas for broadband projects in each of their regions for the purposes of SB 740.⁶ Appendix 4 to the Draft Resolution lists 180 communities in 46 different counties designated as priority areas. CD Staff performed a high-level validation of the consortia's submitted data by comparing these areas with the California Broadband Availability Map.⁷ The Draft Resolution notes that CD Staff concedes that there may be areas identified as served in the Interactive Broadband Map that have been deemed actually underserved or unserved by mobile speed tests or public feedback.⁸ Staff also acknowledges that there may be areas without any mobile speed tests or public feedback that could actually be underserved or unserved areas. The Draft Resolution states that the list in Appendix 4 and the high level validation performed by Staff is meant to spur information gathering which in turn can facilitate broadband deployment in these priority areas.⁹

In order to facilitate the necessary information gathering and public input, ORA recommends that the Priority List spreadsheet be made available on the CASF homepage and be updated accordingly to show any changes to the status of those areas (i.e. such as when an area now deemed served or underserved shows after further testing that the area is in fact not served).

Respectfully submitted,

/s/ KIMBERLY LIPPI

Kimberly Lippi
Staff Counsel
Office of Ratepayer Advocates
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

KPP:nas

cc: John Baker, Communications Division
Service List: Draft Resolution T-17443

⁶ *Id.*, at 8.

⁷ *Id.*, at 10.

⁸ *Ibid.*

⁹ *Ibid.*

CERTIFICATE OF SERVICE

I hereby certify that I have on this date served a copy of **Draft Resolution T-17443 Implementation of New Timelines for California Advanced Services Fund Applicants** to all known parties by electronic mail to the attached service list Draft Resolution T-17443.

Executed on June 11, 2014, at San Francisco, California.

/s/ NANCY SALYER

NANCY SALYER

**SERVICE LIST
DRAFT RESOLUTION T-17443**

aayala@wwmsolutions.com
abloom@ldxx.com
abriggs@gcioa.com
ac4@cpuc.ca.gov
accounting@321communications.com
accounting@ez-netsys.net
accounting@spicetelecom.com
acopeman@ldcb.com
adam@smarterbroadband.com
adilia@cleartalk.net
admin@calling10.com
admin@empyrewireless.com
admin@hellodial.com
admin@velocityatt.com
AdminCoordinator@MendocinoBroadband.org
adnan.shoib@tierzero.com
aeconomou@mettel.net
agertsburg@infotelecom.us
agnes.ng@att.com
aj1@cpuc.ca.gov
aj1@cpuc.ca.gov
ajc@cpuc.ca.gov
akrebs@csumb.edu
al@sunmicrowave.com
Al_Mayerhoff@nyiqc.com
ALEE@accessoneinc.com
alee@btigroup.com
alex@ldpost.com
Alexander@ethericnetworks.com
amaimon@mediacomcc.com
amb@care-ems.com
amckay@telecompliance.net
AMCKAY@TELECOMPLIANCE.NET
an82778@yahoo.com
andre@broadvox.net
andrieu@TELNA.com
angela.pierce@trillion.net
anita@icommlaw.com
anitataffrice@earthlink.net
ap@allvoi.com
araksiya@connectto.com
ARAM.GABRIELIAN@INTARNET.COM
arasura@tcastcom.com
arlee.holt@mymti.com
artgirl@callcbc.com
ashar@telecircuit.com
ashm@telepacific.com
asj@calcable.org
asolomon@acninc.com
asouder@gettingair.com
atreder@bossys.com
att-regulatory-ca@att.com
ayo@cpuc.ca.gov
azabit@ndw.com
azabit@telekenex.com
bankim@bridgevoice.net
barbee.ponder@globalstar.com
bart@digitaldune.net
bbeaty@impacttelecom.com
bblair@affinitymobile.com
bdorran@dtsofca.com
ben.a@primold.com
ben.hulet@mlode.com
ben.hulet@mlode.com
beth.fujimoto@cingular.com
beth@gsaudits.com
betty.sanders@chartercom.com
bhackett@gtl.net
bhoover@pinttopointinc.com
Bill.Mueller@valleyvision.org
billing@tierzero.com
bnusbaum@turn.org
bobbi@visiology.com
bperna@customteleconnect.com
brad@ucsc.edu
brendan.kasper@vonage.com
brent@sedcorp.biz
brobinson@cambaygroup.com
bruce@cybernetcom.com
buenaluz@ztg.net
bwilde@creatint.com
bwilfert@ccicom.com
byung@telava.com
callplanusa@g.com
camurray@integratelecom.com
candy@tctelephone.com
caogdin@interbahn.net
ca-puc@avcinc.com
carl.billek@corp.idt.net
carl.billek@idt.net
carl@mysimplemobile.com
casf@tsra.org
casie.isaacs@thomsonreuters.com
cat@airespring.com
cc2@cpuc.ca.gov
ccase@atcaa.org
ceo@empyrewireless.com
cerickson@acinet.com
ces54@humboldt.edu
cfilak@calltower.com
cfritz@nextiva.com
cg2@cpuc.ca.gov
cgarrett@broadvox.com
cgiles@cuwireless.com
chabran@cctpg.org
chabran@cctpg.org
chantel.mosby@centurytel.com
charlie.born@frontiercorp.com
Charlie.Born@ftr.com
cheryl@wtild.com
chopfinger@securustech.net
chris@connectionportal.com

**SERVICE LIST
DRAFT RESOLUTION T-17443**

Christine.Burke@FTR.com
Christopher@Newrules.org
cindy.manheim@cingular.com
cityattorney@ci.watsonville.ca.us
ckonrad@ldxx.com
cl@sandiegobusiness.org
cléc@race.com
CLECOPS@alec.net
clenno@csumb.edu
cliff.jackson@mybriighthouse.com
clovell@blueroostertelecom.com
cmailloux@turn.org
cmalone@halowireless.com
cmei722@gmail.com
cmemerson@csuchico.edu
cnutting@csufresno.edu
coats@everycall.com
conniestew@humboldt.edu
contact@nationwideregulatorycompliance.com
contracts@wavecomsolutions.com
controller@wci.com
corp@nextgnetworks.net
corporate@certaincorp.com
corporate@onelinkcomm.com
corporate@teledias.com
corporateoffice@teleunoinc.com
cpuc.notice@empireunified.com
cpuc@caryco.info
cpuc@centralcoastbroadbandconsortium.org
cratty@comcast.net
crawn@bctconsulting.com
cregg@uttservices.com
crs@cpuc.ca.gov
crshrader@west.com
cs@colfaxnet.com
csmith@wsteleport.com
cstewart@ipnetworksinc.com
customercare@pulsetele.com
cvm@cpuc.ca.gov
d.fasano@ntta.com
daguire@telscape.net
dand@ponderosatel.com
dane@sonic.net
danielm@lacuracao.com
DanR@goldenstatecellular.com
darren.mass@masscommgroup.com
dave@cenic.org
dave@dmrcom.net
dave@gttelecomm.com
david.discher@att.com
david.macmillan@hq.speakeasy.net
david.olert@intermetro.net
david.price@coast2coastcellular.com
davidd@budgetprepay.com
davidmoon@posdata.co.kr
dbaker@centraltelecomlongdistance.com

dbaker@ustelecomld.com
dbforslund@gmail.com
dblack@grid4.com
dcarney@hypersurf.com
DCHEN@owtel.com
dclark@sebastiancorp.com
dcukier@gtl.net
ddaigle@freedomdarkfiber.com
debbieepe@stcg.net
debi@caltel.com
del.heintz@chartercom.com
dennis.moffit@duddenlink.com
devcomm@aol.com
deyoung@caltel.org
diallongdistance@aol.com
diane.peters@globalcrossing.com
djiron@flatwireless.com
dmarcus2@sbcglobal.net
dmeldazis@peerlessnetwork.com
dmrcaadd@iwvisp.com
dnelson@cvin.com
dnelson@instantphone.org
don.eachus@verizon.com
donna.mcdaniel@mycallis.com
donna@cookscom.com
douglas.becker@ftr.com
douglas.garrett@cox.com
douglasd@cvin.com
dougsimmons101@sbcglobal.net
drodriguez@ypiusa.org
dsandford@cetfund.org
dscott@globalvad.com
dsmat@inetworkgroup.com
dsmat@inetworksgroup.com
dsong@nexgit.com
dward@tsicorp.net
DWTCPUCDOCKETS@dwt.com
earlb@volcanotel.com
ebender@wilcon.com
ecanicosa@aptele.com
ecutright@karuk.us
eddie.mishan@emsonusa.com
edg@cpuc.ca.gov
edorm@cot.net
edwin@janaslani.com
egwolfe@ducortelco.com
ehiggins@corp.digitalpath.net
Einfo@entelegent.com
eitan@dollarphone.com
elise.brentnall@lcbcom.com
emarzullo@sbrda.org
emre.kosmaz@kosmaz.com
enriqueg@greenlining.org
eric@suttercreek.com
erin@solstice-gis.com
ERNEST@ONESOURCENETWORKS.COM

**SERVICE LIST
DRAFT RESOLUTION T-17443**

esears@xcastlabs.com
esther.northrup@cox.com
ethomas@freedomvoice.com
evw@cpuc.ca.gov
expresstel@sbcglobal.net
ezequiel.vega@cityofwatsonville.org
FILABELLE@SANPHONECISCO.COM
finance@telmate.com
finance@thinkingphones.com
fmeng@vertextelecom.com
ForestJames@EnerTribe.com
fpilot@caminofiber.net
frank@x2telecom.com
fred.burris@gosolutions.com
fred.ramer@peakcomm.com
fred@dystebizdev.com
fredmrd@pacbell.net
FUJISHIMA@DOCOMOUSA.COM
g5admin@c-zone.net
gail.long@tdstelecom.com
gary@medalliontelecom.com
gary@wcvad.com
gblack@cwclaw.com
gcosta@betterworldtelecom.com
George.Connott@DPIEnergy.com
george.thomson@ftr.com
george@totel.com
geri@olscomm.com
gil@ncerc.org
GKarish@millervaneaton.com
Gladys.Palpallatoc@ceffund.org
glenn.richards@pillsburylaw.com
glim@enpointe.com
gpelzer@pelzercom.com
gphone@gphone.com
grant.spellmeyer@uscellular.com
greg.m@wholesaleairtime.com
greg.rogers@level3.com
greg@fogeatersinc.com
gregory.castle@att.com
groberts@800response.com
grs@cpuc.ca.gov
gspriggs@cityofplacerville.org
gvc@cpuc.ca.gov
gwagner@virginmobileusa.com
gwilson@impulse.net
hando@canditech.net
hans@starfone.net
heather.gibbs@deltacom.com
heidi@xyncom.com
hpauillin@tconetwork.com
hyejinl@locus.net
info@clearchoicepcs.com
info@cogentco.com
info@myatel.com
info@norstartelecom.com

info@novatelnetworks.com
info@pointtopointinc.com
info@ztelephony.com
irena@vocalipx.com
iriley@telecompliance.net
isaacs@isg-telecom.com
israel@livetel.com
issa@qlinkwireless.com
it_director@bearrivertribe.com
jack.liu@chtglobal.com
jacque.lopez@verizon.com
jahall@corp.earthlink.com
james.mackenzie@quortechequities.com
james.t.meister@windstream.com
james@northcoastnet.com
Janae.WalkerBronson@americantower.com
janewhang@dwt.com
jarrett@smartchoiceus.com
jason.brown@accesspointinc.com
jason@convergence.com
jbarghouthi@intelepeer.com
jbeausoleil@o1.com
jbeausoleil@vayatelecom.com
bj@cpuc.ca.gov
jborchelt@gmail.com
jbrown@vcomsolutions.com
jcarroll@equinoxcorp.com
jclark@gmsr.com
jcrowe@uscable.com
jcui@corp.earthlink.com
jdaniels@tsigrp.net
JDaniels@ustelestis.us
jdolgonas@cenic.org
jdollenmayer@pngmail.com
jeff.jang@openpop.com
jeff@sdfutures.org
jenni.partridge@stiprepaid.com
jennifer.hinojosa@infonxx.com
jennifer.kashatus@dlapiper.com
jennifer.lautenschleger@tdstelecom.com
jesus.g.roman@verizon.com
jgilliland@cvctermination.com
jh@mymti.com
jharper@broadviewnet.com
jhawley@fh2.com
jhawley@technet.org
JIANHUA.MA@VERIZONWIRELESS.COM
jim.brownfield@radical.com
jim@coremarkinc.com
jj@bigrivertelephone.com
jicraddock@conterra.com
jklapper@dialink.com
jkorn@storesonline.com
jlater@broadvox.com
jlawson@adtech-it.com
jlm@mcn.org

**SERVICE LIST
DRAFT RESOLUTION T-17443**

jmaadi@intouchamerica.com
jmanuso@clearworld.net
jmauldin@adamsbroadwell.com
jmills@utilitytelephone.com
jmulvehill@5linx.com
jn@consumertelcom.com
joan.m.engler@verizon.com
Joe.Chicoine@ftr.com
joe.dunbar@verizonbusiness.com
joe.topel@orange-ftgroup.com
johara@anpolutions.com
john.e.owens@gm.com
JOHN@RELIANTBROADBAND.US
john@Spiralinternet.com
john_gutierrez@cable.comcast.com
johng@unitelgroup.com
Johnj@Rapidlink.com
johnj@telenational.net
johnm@consumercellular.com
jon@LDAccess.com
jon@morenotrenching.com
jon-brinton@mitel.com
jorgeaoki@mcbblue.com
jose.camacho@windstream.com
joyce.tessier@future.ca
jparker@credomobile.com
jparker@wafs.com
jpena@rgts.com
jpenney@wavebroadband.com
jrenneker@nos.com
jrhoden@infostructure.net
jriley@telecompliance.net
jrotman@ciphernetworks.ca
jrtkyu@gmail.com
jslater@broadvox.com
jstaker@ci.watsonville.ca.us
jtlowers@sisqtel.net
judykau@dwt.com
julie.laine@twcable.com
jwakefield@covad.com
jwaters@csufresno.edu
jwest@linesystems.com
kaljar@qnet.com
kar@cpuc.ca.gov
karp@humboldt.edu
katherine.mudge@megapath.com
kathy@isphone.net
kdaniel@horizoncable.com
kdawson@icsolutions.com
KD@abs-cbni.com
kelly@northlandco.com
kelly_c@co.lake.ca.us
Ken.Clements@DodsonGroup.net
ken@fastblue.com
kerry@closecall.com
kevin@socaltelephone.com

KevinM@tcoe.org
kgarnett@cal.net
kgorey@bcntele.com
KHoff@fire2wire.com
Kim.Do@megapath.com
kimm.partridge@ucn.net
Kirby@caltel.com
kjl@cpuc.ca.gov
kkchoi@roadwaycom.com
klepper@nadoctors.net
[KMcDine@cpvcom.com](mailto>KMcDine@cpvcom.com)
kmcha@enjoyandtv.com
kmudge@Covad.com
kperkins@rtcli.net
kperkins@rtcl.com
kpoythress@tspan.net
kris@lokt.net
kristi.jaska@viasat.com
Kristin.L.Jacobson@sprint.com
krustrum@co.tuolumne.ca.us
ksanders@ccomati.com
kscovill@telecomsys.com
kwoods@fh2.com
lah@cpuc.ca.gov
lakishat@budgetprepay.com
larry@northcoast.com
larry@speedypin.com
larrylevine@pacifictelephonecompany.net
latwood@its-omni.com
laura@mayhooklaw.com
lchai@cnsny.net
ldc@ldctele.com
ldellaero@matrixbt.com
lderme@bbcominc.com
ldougherty@snipmail.net
leanne.damiani@us.fujitsu.com
lee@ibsinc.com
legal@amphone.com
legal@ringcentral.com
leog@getatc.com
leon@positivetele.com
Lesla@calcable.org
linda.c.stinar@centurylink.com
Linda.cicco@bt.com
linda.hunt@lightyear.net
linda.parks@americanmessaging.net
Linda.Peng@comnet-telephone.com
lindab@stcg.net
linda-best@comcast.net
lisa@cicom.net
Lisa_moglia@cable.comcast.com
jfreeman@bandwidth.com
lmb@cpuc.ca.gov
lmb@wblaw.net
lorrie.bernstein@mossadams.com
lortega@communityunion.org

**SERVICE LIST
DRAFT RESOLUTION T-17443**

louie.decarlo@mci.com
lrice@psrec.coop
lrice@psrec.coop
LRLEYVAMO@BESTEL.COM.MX
lrogers@Premysis.com
ltillery@sbrda.org
lynnf@stcg.net
m.h.pokorny@ildmail.com
m.haley2@verizon.net
m.pokorny@ildmail.com
mad@dcnwireless.com
maflynn@ibasis.net
magli@comtech21.com
mairac@pcs1.net
malciati@inteltrace.com
manzalone@touchtone.net
marc@ttcmail.com
marcel@turn.org
marcelok@telecomusa.com
Marcie.Evans@cox.com
marg@tobiaslo.com
margo.ormiston@verizon.com
maria@vezatelecom.com
mariana.gatewood@telcentris.com
marianne@worldnet1.net
Marilyn.Shandolow@intelliverse.com
mark.goldsmith@troutmansanders.com
mark@access-intl.com
mark@csilongwood.com
mark@surfnetc.com
mark@surfnetusa.com
markc@morenotrenching.com
markn@tpactel.com
martha@IEBroadband.com
martha@mvrconsulting.com
marva.johnson@mybighthouse.com
mary.buley@onvoy.com
maryannmitchell@valornet.com
maryliz.dejong@att.com
matt@calpop.com
matthew.ford@usamobility.com
max.kipfer@discoverybeyond.com
mbarnett@telecare.net
mberg@vodanetworks.net
mbernal@quasarinc.net
mbp@cpuc.ca.gov
mca@cpuc.ca.gov
mccallister@thecinemanet.com
mcegelski@firstcomm.com
mcnicholls@me.com
MCONNOLLY@YOURTEL.COM
md@sandiegobusiness.org
mdozier@csufresno.edu
mdurkin@rawbw.com
melissaslawnson@dwt.com
mhaberek@ami.net

mhaverkate@championbroadband.com
michael.foreman@att.com
michael.minkus@cpuc.ca.gov
michael.sasser@att.com
michael.zarrilli@Suddenlink.com
michael@broadbandassoc.com
michele@american-telesis.net
michelle.salisbury@crowncastle.com
mike.smith@qwest.com
mike@navtel.com
mike@ruralbroadbandnow.com
mike@willitsonline.com
Mike-cpuc@tiedyenetworks.com
miket@itltd.net
mki@cpuc.ca.gov
mlitten@4dct.com
mismulders@ipnetworksinc.com
mmattes@nossaman.com
mmo@cpuc.ca.gov
mok@alliancegrp.com
mort@praxisfiber.com
mpimentel@ci.watsonville.ca.us
mpowers@egreenfield.com
mrichardson@us-south.net
mschreiber@cwclaw.com
mshames@ucan.org
mstachiw@metropcs.com
mtanner@nts.net
mwidbin@reunioncommunications.com
myra@ats-firstcall.com
myron305@TRITelcom.com
mzayas@callone.com
nand@barevox.com
natalievarette@telequality.com
natalieverette@telequality.com
nb2@cpuc.ca.gov
nbledsoe@x5solutions.com
ngreenberg@mono.ca.gov
nicolas@ecvoice.com
nirupampal@gmail.com
nlubamersky@telepacific.com
noc@grasshopper.com
nxb@cpuc.ca.gov
nyoung@helio.com
oip@sentforme.com
opeggy@cruzio.com
osbill@centrisinfo.com
paul.mcaleese@iwirelesshome.com
paul.sieracki@surewest.net
paul@dacinfo.com
paulw@sdwireless.com
pbradshaw@sunesys.com
pchevalier@zayo.com
pclark@paxio.com
pcusack@voxbeam.com
peter.hayes@att.com

**SERVICE LIST
DRAFT RESOLUTION T-17443**

peter.russo@ymaxcorp.com
peter@freeway.com
PHILILLINI@aol.com
phyllis@kgslawyers.com
pioneertelecom@msn.com
pkirby@scitel.net
PL1@cpuc.ca.gov
Planning@Winters-Broadband.com
plumasco@psln.com
pmasters@ernestgroup.com
pod@cpuc.ca.gov
pod@cpuc.ca.gov
ppieters@newedgenetworks.com
preferred@aol.com
preregulatory@comcast.net
psp@cpuc.ca.gov
pstazzone@aldtelecom.com
puc@ValleyInternet.net
pucservice@dralegal.org
r.fasi@darcommunications.com
Ramiz.Rafeedie@att.com
ramona.totten@cnxntech.com
rand@telequality.com
randy@wildirismedical.com
randylowe@dwt.com
raquel.cinat@cetfund.org
raudino@csufresno.edu
raul@corp.race.com
raymond@gctcorp.com
rcocklin@rockgrp.com
rcosta@turn.org
rdepalma@nexustel.net
RDICHY@METTEL.NET
rdj@att.com
reg.compliance@nobelusa.com
RegMgr@stcg.net
regtss@att.com
regulations@allcompass.com
regulatory.compliance@cbeyond.net
regulatory.reporting@cbeyond.net
regulatory@andiamotelecom.com
regulatory@granitenet.com
regulatory@h3net.com
regulatory@hickorytech.com
regulatory@intrado.com
regulatory@legentcom.com
REGULATORY@NETWORKIP.NET
regulatory@opexld.com
regulatory@paclw.com
regulatory@ponderosatel.com
regulatory@publicwireless.com
regulatory@qtelephone.com
regulatory@surewest.com
regulatory@widevoice.com
regulatoryaffairs@anpolutions.com
regulatoryaffairs@zonetelecom.com
regulatorycompliance@gt-t.net
regulatorytax@8x8.com
rex.knowles@xo.com
rfsnacht@wecare.net
rfranz@telelight.com
rgarner@pivotalgroup.com
rgrason@nitelusa.com
rhaynes@psln.com
rhh@cpuc.ca.gov
richard@tremcom.com
rickm@volcanotel.com
rl@acinetcom.com
rlucaes@admatel-usa.com
rmahfouz@msmcpa.com
rmocas@eastontelecom.com
rmonto@neutraltandem.com
rnichols@mmgholdings.net
rnorton@tminc.com
robert.swayze@laedc.org
robert@rhinobee.com
rodney@ctlcorp.net
ron@ewcommunications.net
ronw@teledynamic.com
rperea@nos.com
rquinto@golegacy.com
rriberal@owtel.com
RRichardson@MomentumTelecom.com
rriife@diversifiedconsulting.net
rsalzman@trafone.com
rsanchez@bluecasa.com
rsheehan@nhcgrp.com
rt@kddia.com
rudy.reyes@verizon.com
ruellm@luckycomm.net
rvolker@inyonetworks.com
rvolker@praxisfiber.com
rw1@cpuc.ca.gov
rwh@cpuc.ca.gov
ryan@excitetelecom.com
rynae.benson@verizonwireless.com
s.zolfonoon@planetteleis.com
samuel.sheagren@viasat.com
sandi.romena@gmail.com
sandrawilliams@netoneint.com
sarapw@ftcpa.net
scannon@quick-tel.com
scott.ringo@cinbell.com
scott@myrep.net
SDabbs@CSUFresno.edu
sdavis@voyss.com
sdize@ovctelecom.com
sean@accesshumboldt.net
selbytelecom@gmail.com
sfenker@earthlink.net
sfetzter@cctonline.net
sflatt@sagetelecom.net

**SERVICE LIST
DRAFT RESOLUTION T-17443**

sgnepp@tncii.com
shala@goldline.net
shance@atcaa.org
shannon.wagner@deltacom.com
sheaton@rcrcnet.org
sherri.wheatley@speakerbus.com
shobbs@megapath.com
shurlbert@shafter.com
sierratec@gmail.com
silvcomm@yahoo.com
SIM@cpuc.ca.gov
SimonKim@KTamerica.com
sirusz@planetonline.com
sjoachim@redwoodtelephone.com
smalllecs@cwclaw.com
smartvoicenetwork@gmail.com
smdaniel@horizoncable.net
sntaylor@cot.net
SPark@ITSCommunications.com
sperrotte@800response.com
srt@cpuc.ca.gov
ssearle@ekit-inc.com
ssinclair@airdis.com
sstricker@tspan.net
sstudebaker@dtslfca.com
stephan.shin@cosmobridge.co.jp
stephanie.jackson@ncic.com
stephen.h.kukta@sprint.com
steve.south@vocalocity.com
steveblum@tellusventure.com
steven.au@newworldtel.com
STEVIN@COMITYCOMMUNICATIONS.COM
stthomas@tminc.com
support@mobilenetus.com
support@snowcrest.net
susan.lipper@t-mobile.com
Susan.Odom@BNSF.com
susie.evans@chartercom.com
suzannetoller@dwt.com
suzannetoller@dwt.com
swindsor@tsra.org
swong@globalcomcorp.com
takis@nettalk.com
tara.jackson@birch.com
tara.thronson@valleyvision.org
tbiddix@telecomgroup.com
tch@cpuc.ca.gov
teana@gtfredeem.com
teri@ShepherdsCrook.us
tgoren@g2sol.net
thecardroominc@aol.com
theradioshop@jimsradioshop.com
thomas.haluskey@ecntel.com
thomas.k.braun@sce.com
thomas.selhorst@att.com
tiffany.doan@sprint.com

tim@digitalwest.net
tim@telequality.com
tim@vidafon.com
tina@x2comm.com
tjg@cpuc.ca.gov
tkeane@lebbsi.com
tkimura@nobelglobe.com
tlmurray@earthlink.net
todd@nationalcomtel.com
todd@nccom.com
todd_west@inter-tel.com
todds3@cox.net
tolson@oacys.com
tom.bardo@nelsonmullins.com
tom@uatnow.com
tonya@siskiyoucounty.org
tonyr@wticomunications.com
traci.romedy@cw.com
travis@tctelephone.net
tray@extenetsystems.com
trevor@RoycroftConsulting.org
trp@cpuc.ca.gov
tsanders@icoe.org
tsungi.ludy@lightyear.net
tswift@ustelestar.com
tff@cpuc.ca.gov
twalsh@oneabinetwork.com
twc.regulatory.complaints@twcable.com
tweiksnar@bullseyetelecom.com
twest@cenic.org
twierimaa@mosaicnetworx.com
unitedtelecomca@yahoo.com
vic@interconnections-services.com
vicent.petrescu@necc.us
victor@bktgroup.com
vtownsend@paytel.com
wac@cpuc.ca.gov
waihun@cot.net
wayne@2talk.com
wes@uia.net
wg1@cpuc.ca.gov
wgandy@ecllc.com
william.c.prentice@gmail.com
william.sanders@sfgov.org
wirawan.krisman@team.telstra.com
woolfson@telswitch.com
wscheppy@above.net
XLeonard@gmail.com
xsh@cpuc.ca.gov
ysmythe@caltel.com
yvonne@mobilite.com
ztc@cpuc.ca.gov