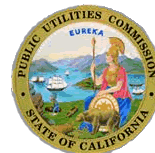


**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



FILED

05/13/19
04:59 PM

Order Instituting Rulemaking to Establish a
Framework and Processes for Assessing the
Affordability of Utility Service.

Rulemaking 18-07-006
(Filed July 12, 2018)

**AT&T COMMENTS ON ALJ'S RULING
ADDING WORKSHOP PRESENTATIONS
INTO THE RECORD AND INVITING
POST-WORKSHOP COMMENTS**

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May 13, 2019

Pursuant to the Administrative Law Judge’s Ruling Adding Workshop Presentations into the Record and Inviting Post-Workshop Comments, AT&T¹ hereby submits its comments.

The days of only one option for Californians to meet communications needs are long gone. Today, Californians communicate through voice service using wireline, wireless or VoIP and communicating by email, Twitter®, Instagram®, SnapChat®, text messaging, FaceBook®, and FaceTime®. Calls can be made using smart speakers connected to the internet such as Amazon Alexa®. Not only are these methods to communicate new, many are free. In 2016, the Commission found that wireless and VoIP have “displaced traditional landline phone as the primary modes of voice communications,”² and “Voice communications itself is a diminishing segment of the broader telecommunications market.”³

Californians find and choose the service(s) they need and can afford from this huge field of communications options. This panoply of services makes measuring affordability of communications services available for Californians a fruitless task.

Moreover, the “Report of the Communications Division Pursuant to Ordering Paragraph 3 of Decision 16-12-025 Analyzing the California Telecommunications Market” further evidences the point that the effort to quantify affordability of communications is not fruitful. In that report, the Staff found that only 0.2% of California households have the choice

¹ Pacific Bell Telephone Company d/b/a AT&T California (U 1001 C) and its affiliates AT&T Corp. (U 5002 C); Teleport Communications America, LLC (U 5454 C); and AT&T Mobility LLC (New Cingular Wireless PCS, LLC (U 3060 C); AT&T Mobility Wireless Operations Holdings, Inc. (U 3021 C); and Santa Barbara Cellular Systems, Ltd. (U 3015 C)) are collectively referred to hereinafter as “AT&T.”

² *Re Order Instituting Rulemaking on the Commission’s Own Motion to Assess and Revise the Regulation of Telecommunications Utilities*, Decision No. 06-08-030, *Opinion* 2006 WL 2527822 (Cal.P.U.C. Aug. 24, 2006), *mimeo*, pp. 262, 267-68 (Findings of Fact 17, 19, 67, 76).

³ *Id.* at 263 (Finding of Fact 24).

